



NPDES Compliance Inspection Report

Atkore Plastic Pipe Corporation Eugene, Oregon

Permit #: ORR231302

Inspection Date: March 23, 2021

Prepared by:

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U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
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Signature/Date:

Supervisor Signature/Date:

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ATTACHMENT A – Aerial Images of Site Provided by the Facility

ATTACHMENT B – Inspection Photographs and Photograph Log

(All details in this report were obtained through conversations with Mr. Keith Dinkheller or from observations made during the inspection.)

I. Facility Information

Facility Name: Atkore Plastic Pipe Corporation

Facility Owner/Operator: Atkore International

Physical Address: 2220 Nugget Way
Eugene, Oregon 97403

Lat/Long: 44.03650, -123.03003

Mailing Address: 2220 Nugget Way
Eugene, Oregon 97403

NAICS Code: 326122 (Plastics Pipe and Pipe Fitting Manufacturing)
SIC Code: 3084 (Plastics Pipe & Pipe Fitting mfg (pt))

Facility Contacts: Keith Dinkheller
Plant Manager
Office Phone: 541-746-6066
Cell Phone: 435-531-9793
Email: kdinkheller@atkore.com

Permit Number: ORR231302

Receiving Water: MS4 → Willamette River

II. Inspection Information

Inspection Date: March 23, 2021

Inspector: Raymond Andrews, Inspector
EPA Region 10, ECAD /FDDWES
Phone: 206-553-4252

Arrival Time: 10:00 AM

Departure Time: 2:00 PM

Weather: Sunny, 41°F

Purpose: To determine facility compliance with the Oregon 1200-Z General National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act.

III. Permit Information

Atkore Plastic Pipe Corporation (“Facility”) is permitted under the Oregon 1200-Z General National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit (“Permit”). The Facility’s permit, NPDES permit # ORR231302, became effective on August 1, 2017, and will expire on July 31, 2022. The facility is permitted under Sector Y (Rubber, Miscellaneous Plastic Products, and Miscellaneous Manufacturing Industry) of the permit and has had permit coverage since 2017.

IV. Background

Atkore International, Inc. owns and operates Atkore Plastic Pipe Corporation located at 2220 Nugget Way in Eugene, Oregon.

The facility was previously inspected by the Environmental Protection Agency (EPA) for compliance with the Oregon 1200-Z Stormwater Discharge permit on September 16, 2019. At the time of the inspection, no areas of concern were identified.

V. Inspection Chronology

This was an announced inspection. On March 22, 2021, I called Mr. Keith Dinkheller, Plant Manager, and stated that I wanted to conduct a NPDES compliance inspection of the Atkore Plastic Pipe Corporation facility in Eugene, Oregon. We agreed to meet at the facility on March 23, 2021, at 10:00 am.

I conducted an Opening Conference, which included an interview of Mr. Dinkheller, followed by a records review, a site inspection, and a Closing Conference.

Inspector’s Note: All directional references used in this report are approximations.

VI. Opening Conference

I arrived at the facility at 10:00 am, as agreed. I presented my credentials to Mr. Dinkheller and provided him a copy of the EPA Small Business Resource Sheet.

I explained the purpose of the inspection was to determine compliance with the Oregon Department of Environmental Quality’s (ODEQ) 1200-Z permit and the Clean Water Act (CWA).

The following information was obtained through conversation with Mr. Dinkheller.

The facility has been in operation at its current location since 2017. The facility operates 24-hours a day, seven days a week, and has 106 full time employees. Mr. Dinkheller started working at the facility in August 2019.

Atkore Plastic Pipe Corporation is part of a larger corporation, Atkore International, Inc. The parent corporation has multiple locations engaged in a wide range of activities.

This facility makes PVC electrical conduit as well as PVC water and irrigation pipe so it can serve both the electrical and plumbing markets. The facility receives pre-made plastic pipe which it cuts, bends, and flares to customer specifications. “Flaring” is the process of enlarging one end of a pipe so another pipe can connect to it.

The facility conducts activities indoors and outdoors.

Indoor Activities

Indoor activities include manufacturing and packaging of products, maintenance of production equipment, and maintenance of one of the forklifts by a contractor since the forklift is leased. Some forklifts are parked inside.

Outdoor Activities

Outdoor activities are loading and unloading of raw materials and finished products, and storage of packaged product awaiting ship out. No cleaning of equipment or material is performed outside. Some forklifts are parked outside when not in use. The forklifts I observed outside had drip pans in place.

Per the permit, the facility is required to conduct routine monthly inspections, and quarterly visual inspections. Both the monthly and quarterly inspections are conducted by Terry Engleheart, the Quality Assurance (QA) Inspector.

According to Mr. Dinkheller, the site is generally flat, however, the property has a highpoint running the length of the property along the northwest – southeast axis. The slight downward slope from the center of the property facilitates drainage and control of stormwater.

VII. Laboratory Inspection

On August 7, 2018, ODEQ waived the facility’s sampling requirements for oil & grease (O&G), pH, total suspended solids (TSS), total copper (Cu), and total lead (Pb), in accordance with Schedule B.4 of the permit. Additionally, on January 9, 2019, ODEQ waived the sampling requirement for total zinc (Zn). The waiver extends through the end of the permitting cycle, which ends on July 31, 2022. Schedule B.4 allows a facility to request a monitoring waiver after four consecutive qualifying samples show the facility is below permit benchmarks. The facility continues to monitor for the impairment parameters of mercury (Hg), dissolved lead (Pb), total iron (Fe), and biochemical oxygen demand (BOD).

The facility does not maintain an in-house laboratory. All monitored parameters are analyzed by:

Analytic Laboratory Group
361 West 5th Avenue
Eugene, Oregon 97401
(541) 485-5401

Analytic laboratory prepares the facility's Discharge Monitoring Reports (DMRs) for the facility. After receiving the completed DMRs from the laboratory, Mr. Dinkheller reviews and signs them then submits them to ODEQ.

VIII. File Review

The permit requires that documentation be retained for a minimum of three years.

I reviewed the following records and documents:

- Permit Reissuance Letter – October 24, 2018
- Stormwater Pollution Control Plan (SWPCP) – revised January 18, 2021
- Monthly Facility Inspection Reports – March 2018 through February 2021
- Chain-of-Custody Documents – March 2018 through February 2021
- Discharge Monitoring Reports (DMRs) – February 2018 through February 2021
- Annual Employee Training Records – 2018 through 2020
- Monitoring Waiver Letter – January 9, 2019

All requested documents were available and reviewed.

IX. Site Inspection

An aerial image, provided by the facility, appears in **Attachment A**. The photographs used in this inspection report and a complete photo log appears in **Attachment B**.

Following the records review, Mr. Dinkheller and I walked outside so I could conduct the site inspection. The facility's site covers approximately 11.25 acres with almost the entirety of the footprint impervious to penetrative rainfall. About 62% of the site is exposed to precipitation with the remaining 38% covered by structures.

Once the Opening Conference concluded, I asked to be shown to the center of the property so that I could try to discern the slope. Upon exiting the office building, I saw several stacks of plastic pipe which were banded to pallets (**Photo 1**). Mr. Dinkheller said those stacks of pipe were waiting to be loaded up and shipped to storage. The site had several locations where plastic pipe were either waiting to be shipped to storage or waiting to be taken into the production building to be cut and shaped (**Photo 2**). I also observed a covered, three-sided structure, which was used to store tanks and barrels containing oil and glycerin (**Photo 3**). The tanks were double-walled, and the floor of the structure was raised and grated to act as secondary containment.

When we reached the approximate center of the property, I surveyed the area. From my position, I could discern a slight downward slope to the east and west. On the east side, it appeared stormwater would sheet flow in an easterly direction to the street, Nugget Way, and would enter the City of Eugene's ("City") MS4 system. Mr. Dinkheller guided me to the City's storm drain, which lay just outside the eastern perimeter fence. As we approached the fence, I observed straw waddle (**Photo 4**) lining the facility side of the fence. Mr. Dinkheller said the straw waddle prevents particulate matter from entering the City's Municipal Separate Storm Sewer System (MS4) through the storm drain (**Photo 5**), which catches some of the site's stormwater. From the MS4, the water eventually enters the Willamette River.

The facility maintains a bioswale (**Photo 6**) on the eastern edge of the site just inside the perimeter fence, it catches stormwater that sheet flows from the southeastern section of the site. Mr. Dinkheller said the bioswale allows some stormwater to infiltrate.

We continued the inspection by walking the perimeter of the facility in a northerly direction to the end of the property. In the northeastern corner of the property, the facility maintains an “Infiltration Strip”. The infiltration strip serves the same purpose as the bioswale by catching stormwater from the northeastern section of the site.

The site has two sampling points. The first sampling point is in the northeastern section of the site. A representative of Analytic Laboratory Group (ALG) takes a grab sample from a manhole (**Photo 7**) on the site.

We turned west and walked to the northwestern corner of the site. The northwestern corner of the property is the terminus of the stormwater collection system for the west side of the site. Stormwater sheet flows from the west side of the site into an old gravel-covered railroad track spur. The stormwater “typically” follows the railroad tracks (**Photo 8**). Any stormwater that does not infiltrate enters a storm drain (**Photo 9**). The drain is protected from excessive particulate matter by a filter sock on the upstream side.

The second sampling point is on the southwestern edge of the site. Mr. Dinkheller said the sample is collected at this location using a procedure that ponds stormwater as it sheet flows. The sample is collected by a facility employee under the supervision of an ALG representative. Once the sample is collected, it is handed to the representative.

The Willamette River is approximately 450 yards east of the facility.

X. Areas of Concern

At the time of inspection, I found the following areas of concern:

- A. Schedule A.6.b of the Permit states, “The SWPCP must be signed and certified in accordance with 40 CFR §122.22.”

40 CFR §122.22 requires a responsible officer of the company to sign the statement, “I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining information, I believe that the submitted information is true, accurate, and complete.”

During the inspection, I reviewed the Stormwater Pollution Control Plan (SWPCP). The SWPCP was signed and included the correct certification language as required by 40 CFR §122.2; however, the information in the SWPCP was not accurate. In section 3.5.1 of the SWPCP, the plan stated the Stormwater Pollution Control Team (SPCT) was identified in Table 7; however, Table 7 identifies the location of spill kits. The SPCT table is labeled as Table 9.

- B. Schedule A.7.b. of the Permit indicates requirements for the site map, which includes “loading/unloading areas”, “processing and storage areas”, and “transfer areas for substances in bulk.”

At the time of the inspection, the site map did not include the locations of “loading/unloading areas”, “processing and storage areas”, and “transfer areas for substances in bulk.”

- C. Schedule A.7.c.i of the Permit states that the SWPCP must “...indicate who is responsible for on-site management of significant materials and include their contact information.”

At the time of the inspection, the SWPCP did not indicate, by name, who was responsible for on-site management. The SWPCP listed those responsible by position title only.

- D. Schedule A.7.c.iii of the Permit states the SWPCP must contain an Operations and Maintenance (O&M) Plan for “...passive treatment and low impact development control measures...” which includes “...routine maintenance standards.”

At the time of the inspection, the facility was using a passive treatment system but the SWPCP did not contain an O&M Plan.

XI. Closing Conference

On March 23, 2021, I held a closing conference with Mr. Dinkheller. We discussed my observations and I gave a brief overview of the post-inspection process. I thanked him for his time and assistance.

ATTACHMENT A

Aerial Images of Site Provided by the Facility



ATTACHMENT B

Inspection Photographs and Photograph Log

(Photographs taken by Ray Andrews on March 23, 2021 with a Panasonic DMC-FH25 camera)



Photo 1 / P1000793 – Plastic Pipe, awaiting transport to storage



Photo 2 / P1000794 – Plastic Pipe, waiting to be processed



Photo 3 / P1000801 – Drum & Tank, storage area



Photo 4 / P1000795 – Straw Waddle



Photo 5 / P1000796 – Storm Drain, east side



Photo 6 / P1000803 – Bioswale



Photo 7 / P1000802 – Sampling Location



Photo 8 / P1000800 – Railroad Track Path, facing north



Photo 9 / P1000799 – Storm Drain, west side

Complete list of photographs taken during the inspection:

- P1000784 – SWPCP, Cover Page
- P1000785 – SWPCP, Title Page
- P1000786 – SWPCP, Certification Page
- P1000787 – SWPCP, Review Table
- P1000788 – SWPCP, 3.5.1 SPCT, Table 7 referenced
- P1000789 – SWPCP, Table 7
- P1000790 – SWPCP, Table 9
- P1000791 – Permit Assignment Letter, page 1
- P1000792 – Permit Assignment Letter, page 2
- P1000793 – Plastic Pipe, awaiting transport to storage
- P1000794 – Plastic Pipe, waiting to be processed
- P1000795 – Straw Waddle
- P1000796 – Storm Drain, east side
- P1000797 – Storm Drain, east side, close-up
- P1000798 – Packaged Pipe, awaiting ship out
- P1000799 – Storm Drain, west side
- P1000800 – Railroad Track Path, facing north
- P1000801 – Drum & Tank, storage area
- P1000802 – Sampling Location
- P1000803 – Bioswale