



Region 10 Enforcement and Compliance Assurance Division

1200 6th Avenue

Seattle, WA 98101

INSPECTION REPORT

Inspection Date:	05/26/2021	
Time:	Entry: 9:00 a.m.	Exit: 12:05 p.m.
Weather:	Periodic overcast with evidence of recent precipitation	
Media:	Water	
Regulatory Program:	CWA NPDES/Industrial Stormwater	
Permittee Name(s):	Woodgrain Millwork	
Permittee Addresses:	1201 W. Karcher Rd.	
Permittee City, State, Zip Code:	Nampa, ID 83687	
Facility Name:	Woodgrain Millwork	
Facility Physical Location:	1201 W. Karcher Rd.	
	Latitude/Longitude	43.604444°, -116.592778°
City, State, Zip Code:	Nampa, ID 83687	
Facility Contact(s):	Greg Wood, Maintenance Manager Phone: (208) 447-9358 Email: gwood@woodgrain.com	
County:	Canyon County, Idaho	
NPDES Permit:	2015 EPA Multi-Sector General Permit (MSGP)	
EPA Facility Identifier:	IDR053086	
Industrial Sector	MSGP Sector A – Timber Products Facilities	
Subsector	A4	
Primary SIC Code(s)	2431	
Facility Receiving Water(s)	Indian Creek to the Boise River	
Facility Receiving Water(s) Description:	Creek	
Inspector(s):		
Anthony D'Angelo – PG Environmental	U.S. EPA Contract Inspector (Lead Inspector)	(720) 789-8049
Signature: 		Date: 08/11/2021
Charissa Bujak – EPA Region 10	U.S. EPA Inspector	(208) 378-5754
Aaron Harnsberger	IDEQ Compliance Officer	(208) 236-6160
Brett Morrison	IDEQ Compliance Officer	(208) 373-0269
EPA Region 10 Recipient: Brian Levo		
Signature:	Date:	

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Section I – Inspection Information

Purpose and Scope of the Inspection

On May 26, 2021, I, Anthony D'Angelo, a U.S. Environmental Protection Agency (EPA) Contract Inspector, along with U.S. EPA inspector Charissa Bujak (hereafter, we or Inspection Team) conducted an industrial stormwater inspection of Woodgrain Millwork (hereafter, Permittee or Facility) in Nampa, Idaho. We were accompanied by two compliance officers for the Idaho Department of Environmental Quality (IDEQ), Aaron Harnsberger and Brett Morrison. The purpose of the inspection was to determine compliance with the requirements of EPA's National Pollutant Discharge Elimination System (NPDES) 2015 Multi-Sector General Permit for Discharges of Stormwater Associated with Industrial Activities (hereinafter, the MSGP or Permit). The Permittee is authorized to discharge under the Permit under NPDES Permit No. IDR053086. The inspection consisted of two parts, a preliminary records review and a Facility walk-through. Inspection photographs from the Facility walk-through are included in this report as Attachment A. Exhibits are included in this report as Attachment B. The Inspection Team requested a digital copy of the files reviewed during the inspection and performed a more thorough review after the onsite inspection.

Opening Conference

I provided a notice of inspection, via phone call, to office staff at Woodgrain Millwork Fruitland facility, on the morning prior to the inspection at approximately 8:00 a.m., as office staff at Woodgrain Millwork in Nampa (the Facility) were unavailable. The staff at the Fruitland facility confirmed that they notified Nampa facility staff of the inspection. Upon arriving at the Facility at 9:00 a.m., we met Greg Wood, Miguel Velasco, Derek Laudal, and Jerry Hardin (hereinafter, Facility representatives) near the Facility entrance, checked in, and proceeded to a conference room to discuss the inspection. Charissa Bujak and I presented our inspector credentials to the Facility representatives at that time. Mr. Wood explained that he is primarily responsible for NPDES compliance at the Facility and is responsible for conducting inspections and monitoring, training Facility staff, and reporting NPDES compliance data to EPA. He explained that Mr. Velasco, the Safety Manager, had recently taken over NPDES responsibilities at the Facility but was still getting up to speed on requirements and responsibilities but had been performing the recent Facility inspections.

During the opening conference, we held brief discussions with the Facility representatives regarding the Facility's operations, industrial activities, compliance activities such as inspections and monitoring, employee training program, corrective actions, and recordkeeping.

Additionally, during the opening conference, we verified that Permit-related documentation was maintained onsite electronically; however, due to COVID-19, we did not conduct a thorough review of all records maintained onsite at the time of the inspection. Documentation briefly reviewed electronically with the Facility representatives included the November 2015 stormwater pollution prevention plan (SWPPP), the previous Notice of Intent (NOI), and inspection documentation spreadsheets. Mr. Velasco explained that he is now responsible for maintaining and updating Permit records such as the SWPPP, annual reports, inspection records, corrective action reports, and monitoring data, which are retained electronically on the Facility's internal server. For inspections, Mr. Velasco explained that he documents inspection observations via voice recorder and that these

recordings are used to complete the Facility's internal inspection tracking spreadsheet as well as the Stormwater Industrial Routine Facility Inspection Reports. Permit-related documentation from 2017 to 2021 was requested to be provided electronically for further review following the inspection. This electronic documentation was provided by Mr. Velasco to the Inspection Team on May 28, 2021.

At the time of the inspection, the Facility was implementing its SWPPP, dated November 1, 2015. Mr. Wood informed the Inspection Team that the Permittee had already submitted a Notice of Intent (NOI) to EPA for coverage under the 2021 MSGP and that the SWPPP would be revised once the 2021 MSGP takes effect.

Following the opening conference, we proceeded outdoors with the Facility representatives to conduct the Facility walk-through.

Facility Description

Woodgrain Millwork, Inc. is a wood moulding and door part production facility (refer to Appendix A, Photograph 1). The Facility is subject to Sector A, subsector A4, SIC Code 2431, Millwork. The Facility is located along two main parcels separated by W. Karcher Road (refer to Appendix B, Exhibits 1 and 2). The northern parcel comprised the majority of the Facility and includes various production warehouses, baghouses, sawdust loading area, and outdoor material/equipment storage areas. Indian Creek, the Facility's sole receiving water flows northwest along the eastern boundary of the northern parcel. The southern parcel is used primarily as administrative. An employee parking lot is located east of the northern parcel, on the eastern and opposite side of Indian Creek.

The Facility discharges stormwater to Indian Creek at multiple locations but has identified one single outfall as its compliance point, Outfall SW1, located on the central-east perimeter of the northern parcel (refer to Exhibits 1 and 2, and Photographs 2 and 3). Outfall SW1 receives stormwater runoff from a single storm drain located in the center of the northern parcel. Facility representatives stated this storm drain first passes through an onsite sand/oil separator before discharging through Outfall SW1 to Indian Creek (refer to Photographs 4 and 5). The Inspection Team identified various other stormwater discharge points (without treatment) along the Facility's eastern perimeter including two open pipe conveyances in the northeast and southeast portion of the northern parcel (refer to Photographs 6 through 8), multiple downspouts piped directly to Indian Creek in the southeastern corner of the northern parcel (refer to Photographs 9 through 11), and other discrete overland conveyance discharge points to Indian Creek in the southeastern corner of the northern parcel (refer to Photographs 12 and 13). The Inspection Team also observed a stormwater retention basin located in the northeastern corner of the northern parcel which receives stormwater runoff from the northern portion of the Facility through a single storm drain (refer to Photographs 14 through 16). The Facility representatives explained that this stormwater retention basin was constructed as part of the construction of the Facility's newest warehouse building in the northern portion of the northern parcel and to their knowledge, the retention basin has never discharged stormwater to Indian Creek.

Indian Creek subsequently discharges to the lower section of the Boise River which is designated as impaired for sediment, phosphorous, and fecal coliform bacteria. As required by Part 6.2.4, Discharges to Impaired Waters Monitoring, of the MSGP, the Facility is required to conduct quarterly benchmark monitoring for total suspended solids (TSS), total phosphorus (TP) and E. coli to meet target values identified in written notice from EPA Region 10 to the Permittee in December 2015. Additionally, the

Facility is subject to additional benchmark monitoring for chemical oxygen demand (COD) and TSS under Subsector A4.

Documents Requested During Inspection

Due to the ongoing COVID-19 pandemic, the Inspection Team confirmed that the SWPPP, NOI, and inspection documentation was available for review but did not conduct a thorough review of all Permit-required records maintained onsite at the time of the inspection. The Inspection Team requested the following documents electronically for review following the onsite inspection. Copies of the following documents requested during the inspection were provided by Mr. Velasco on May 28, 2021; documents used in support of observations made in this report are included in [Appendix B, Exhibit Log](#) and referenced where applicable.

- Stormwater Pollution Prevention Plan (SWPPP), November 1, 2015 (no appendices provided)
- May 2021 STORM WATER RUNOFF map
- Annual Reports, 2017-2020
- Stormwater Industrial Routine Facility Inspection Reports, 2018-2021
- MSGP Quarterly Visual Assessment Reports, 2016-2021
- Employee training records, 2017-2020
- Analytical laboratory results, chain of custodies, and monitoring reports for all compliance sampling, 2015-2021

Section II – Observations

Following the opening conference, the Inspection Team and IDEQ compliance officers, accompanied by the Facility representatives, began the Facility walk-through at the intersection of W. Karcher Road and Midland Boulevard. At the time of the inspection, the weather was sunny, with temperatures in the 60s. The Facility received significant rainfall on the day prior to the inspection. We started the Facility walk-through along Indian Creek at the employee parking area ([refer to Photograph 1](#)). We crossed a bridge from the employee parking area into the northern parcel and walked the Facility's eastern perimeter along Indian Creek. We observed multiple stormwater discharge points, including Outfall SW1, as well as other outdoor material and waste storage areas. We observed the stormwater retention basin in the northeastern corner of the northern parcel as well as the northern portion of the Facility. Mr. Wood explained that the stormwater retention basin is not on routine maintenance schedule because the bottom surface is highly permeable and drains quickly. We then continued south, through the center of the northern parcel, observing outdoor industrial areas between the Facility's warehouses including the storm drain and sand/oil separator that lead to Outfall SW1 and the Facility's trash compactor. Facility representatives explained that the sand/oil separator is inspected and maintained annually and that solids from the sand/oil separator, as well as wastewater from gluing operations, is hauled offsite by a contractor, Master Rooter. Additionally, they explained that to reduce saw dust from commingling with stormwater runoff around the warehouse production buildings, street sweepers are operated daily throughout the outdoor paved surfaces of the northern parcel.

We concluded the Facility walk-through at the southern end of the northern parcel. We proceeded back to the Facility's conference room with Mr. Velasco to conduct a closing conference.

For a list of areas of concern regarding the review of Permit-required documents and onsite Facility walk-through, refer to Section III, Areas of Concern.

Section III – Areas of Concern

The presentation of areas of concern does not constitute a formal compliance determination or violation. An area of concern is an observation that the Inspection Team made that may be inconsistent with the requirements of the Permit. The Inspection Team noted areas of concern in both the records review performed post-inspection and the onsite Facility walk-through.

1. Part 2.1, Control Measures.

You must select, design, install, and implement control measures (including best management practices) to minimize pollutant discharges that address the selection and design considerations in Part 2.1.1, meet the non-numeric effluent limits in Part 2.1.2, meet limits contained in applicable effluent limitations guidelines in Part 2.1.3, and meet the water quality based effluent limitations in Part 2.2. The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications.

Area of Concern 1

The Inspection Team observed evidence of recent sediment mobilization and stormwater discharge from the Facility to Indian Creek at various locations, via piped conveyances and discrete overland conveyances (refer to Photographs 6 through 13). In general, the Inspection Team observed an overall lack of best management practices (BMPs) deployed along the Facility's eastern perimeter, directly adjacent to Indian Creek. Multiple industrial activities were present along this perimeter including fuel storage, waste collection, baghouse operations, truck loading/unloading, and outdoor equipment/material storage.

2. Part 6.1.1, Monitored Outfalls.

Applicable monitoring requirements apply to each outfall authorized by this permit, except as otherwise exempt from monitoring as a "substantially identical outfall." If your facility has two or more outfalls that you believe discharge substantially identical effluents, based on the similarities of the general industrial activities and control measures, exposed materials that may significantly contribute pollutants to stormwater, and runoff coefficients of their drainage areas, you may monitor the effluent of just one of the outfalls and report that the results also apply to the substantially identical outfall(s). As required in Part 5.2.5.3, your SWPPP must identify each outfall authorized by this permit and describe the rationale for any substantially identical outfall determinations.

Appendix B.10.A, Monitoring and Records.

Samples and measurements taken for the purpose of monitoring must be representative of the volume and nature of the monitored activity.

Area of Concern 2.a

The Facility's stormwater sample collection location, Outfall SW1, is not representative of all industrial activities conducted at the Facility. The Inspection Team observed multiple and differing industrial areas at the Facility which would not contribute stormwater runoff to Outfall SW1. Specifically, baghouse operations, equipment storage, and waste dumpster staging was observed along the eastern perimeter of the northern parcel, south of Outfall SW1. Stormwater runoff from this area of the Facility is discharged through an unnamed open pipe stormwater outfall to Indian Creek, south of Outfall SW1 (refer to Exhibit 1, and Photographs 6, 7, 17, and 18).

Additionally, sawdust loading operations and truck loading/unloading activities were observed occurring on the northeastern side of the northern parcel. Stormwater runoff from this area of the Facility is discharged through an unnamed open pipe stormwater outfall to Indian Creek, north of Outfall SW1 (refer to Exhibit 1, and Photographs 8 and 19).

Furthermore, fuel and equipment storage areas were observed along the southeastern perimeter of the northern parcel. Mr. Wood explained that stormwater runoff from this area is primarily roof drainage which is conveyed to Indian Creek by both roof downspouts piped underground to the creek or by discrete overland conveyances (refer to Photographs 9 through 13). The Permittee had not previously identified and included these additional stormwater discharge points in its NOI to EPA for coverage under the Permit. However, the May 2021 STORM WATER RUNOFF map provided after the inspection does identify the two unnamed open pipe stormwater outfalls (noted as "drain") as well as the roof downspout drainage (refer to Exhibit 2). Facility representatives confirmed that stormwater sampling for the purpose of compliance reporting had only occurred at Outfall SW1 during the Permit term.

Area of Concern 2.b

The Facility's sample collection location was located at the end of pipe at Outfall SW1 which, at the time of the inspection, was directly at the water line of Indian Creek with creek water partially in the outfall pipe (refer to Photographs 2 and 3). Since the end of pipe was located at the water line of Indian Creek, the Inspection Team observed a potential for creek water to comeingle with stormwater discharges at the point of collection, especially during wet weather events where the creek level may be higher than normal.

3. Part 2.1.2.10, Dust Generation and Vehicle Tracking of Industrial Materials.

You must minimize generation of dust and off-site tracking of raw, final, or waste materials in order to minimize pollutant discharges.

Area of Concern 3

The Inspection Team observed sawdust deposition on both impervious and pervious surfaces adjacent to a baghouse located upgradient of an open pipe stormwater outfall, south of Outfall

SW1. Additionally, the Inspection Team observed a visible plume of sawdust emissions from the baghouse unit in this area of the Facility, adjacent to Indian Creek (refer to Photographs 20 through 23).

Part 3.1.8, Dust Generation and Vehicle Tracking of Industrial Materials, of the 2015 SWPPP states, "Many improvements have recently been done to the dust handling systems at this facility. This will reduce the potential for wood dust to come in contact with storm water. Woodgrain's Fruitland Facility is a Major Air pollution source, requiring a Title V permit. Woodgrain is in compliance with this permit, which not only protects the air, but also prevents air containments from entering the Stormwater system. The facility air quality permits require quarterly air inspections to verify no visible emissions are present." It should be noted that this quotation is from the Facility's 2015 SWPPP but references Woodgrain Millwork's Fruitland facility and does not discuss the Nampa facility.

4. Part 2.1.2.1, Minimize Exposure.

Locate materials, equipment, and activities so that potential leaks and spills are contained or able to be contained or diverted before discharge; and use spill/overflow protection equipment.

Area of Concern 4

The Inspection Team observed dark, residual staining indicative of oil and grease on the pavement immediately outside a warehouse building in the central portion of the northern parcel (refer to Photographs 24 and 25). Facility representatives stated that the staining was from a generator located on the inside of the warehouse wall. Based on the amount of residual staining, this appeared to have been occurring for some time. Additionally, the Inspection Team observed wet oil staining on the ground surface between a Facility building and Indian Creek on the southeast side of the northern parcel. Absorbent material had been applied to this wet staining.

Additionally, the Inspection Team observed liquid glue containers stored outdoors near the trash compactor without secondary containment, upgradient of the storm drain connected to the Facility's sand/oil separator and Outfall SW1 (refer to Photographs 26 through 28). Mr. Wood explained these containers are typically stored indoors and most likely had just arrived at the Facility.

5. Appendix B.10.C, Monitoring and Records.

Records of monitoring information must include:

1. The date, exact place, and time of sampling or measurements;
2. The individual(s) who performed the sampling or measurements;
3. The date(s) analyses were performed;
4. The individual(s) who performed the analyses;
5. The analytical techniques or methods used; and
6. The results of such analyses.

Area of Concern 5

Monitoring records were not reviewed onsite at the time of the inspection but were requested for review post-inspection. Monitoring records provided by the Permittee on May 28, 2021 were generally incomplete or unreadable. Additionally, lab data for certain parameters on certain sampling dates was not produced. Furthermore, documentation for sampling conducted at the Facility on May 25, 2021 was not provided (i.e., chain-of-custody for samples collected). Table 1 below identifies a summary of the Inspection Team's observations related to the Permittee's monitoring records for the Facility.

Table 1. Monitoring Records Observations

Quarter/Year	Sample Date	Observation in Files
Q4 2020	11/13/2020	No chain-of-custody (COC)
Q2 2020	4/30/2020	COC unreadable (refer to Exhibit 3)
Q1 2020	1/24/2020	COC unreadable
Q4 2019	12/12/2019	No COC No lab results for E. coli (refer to Exhibit 4)
Q2 2019	5/17/2019	No lab results for E. coli
Q1 2019	2/13/2019	No lab results for any parameters COC unreadable
Q4 2018	10/4/2018	No COC No lab results for E. coli
Q2 2018	4/12/2018	No COC

6. Part Section 3.1, Routine Facility Inspections.

At least once each calendar year, the routine inspection must be conducted during a period when a stormwater discharge is occurring.

Area of Concern 6

Facility representatives were not aware of the requirement to conduct at least one quarterly routine inspection during wet weather annually. Inspection documentation produced for 2018, 2019, and 2020 do not demonstrate that at least one inspection was conducted when a stormwater discharge was occurring. It should be noted that during quarters when a representative storm event did occur, the Permittee did complete quarterly stormwater discharge visual observations as required by the Permit. These visual observations occurred during stormwater sampling events.

7. Part 5.2.2, Site Description, includes SWPPP requirements for a site map.

Area of Concern 7

During the inspection, the Inspection Team briefly reviewed the 2015 SWPPP site map with the Facility representatives. This map, although reviewed quickly, did not appear to identify outfalls into Indian Creek. The 2015 SWPPP provided to the Inspection Team by the Permittee following

the inspection was in Word version and did not include the site map appendix. Instead, a separate map with the file name 'May 2021 STORM WATER RUNOFF map' was provided to the Inspection Team on May 28, 2021 (refer to Exhibit 2). This map is actually titled 'Plot Plan, Nampa Door Plant' dated April 15, 2014. This map was reviewed by the Inspection Team in detail after the inspection and did not include all elements required by the Permit, including:

- The dumpster staging area to the south of Outfall SW1 by the unnamed open pipe stormwater discharge point (refer to Photograph 18). Pallet and empty tote storage was also observed in this area during the inspection but were not included on the site map.
- Outdoor equipment/material storage areas along Indian Creek near Outfall SW1 (refer to Photograph 29).
- Trash compactor and adjacent outdoor material storage in the center of the northern parcel (refer to Photographs 5 and 26).
- Portable restrooms located in the central portion of the northern parcel (refer to Photograph 4).
- Equipment storage/boneyard area on the northwest side of the Facility (identified on May 2021 STORM WATER RUNOFF map' solely as trailer parking; refer to Exhibit 2).

8. Part 5.2.1, Stormwater Pollution Prevention Team.

You must identify the staff members (by name or title) that comprise the facility's stormwater pollution prevention team as well as their individual responsibilities.

Area of Concern 8

The 2015 SWPPP provided by the Permittee had not been revised to identify Mr. Velasco as 1) a member of the stormwater pollution prevention team or as 2) the individual conducting Facility inspections. Facility representatives explained they were preparing to revise the SWPPP to meet the requirements of the 2021 MSGP and will include Mr. Velasco in that update.

9. Part 5.2.5.3, Pertaining to Monitoring.

You must document in your SWPPP procedures for conducting the five types of analytical monitoring specified by this permit, where applicable to your facility, including:

- Benchmark monitoring (see Part 6.2.1);
- Effluent limitations guidelines monitoring (see Part 6.2.2);
- State- or tribal-specific monitoring (see Part 6.2.3);
- Impaired waters monitoring (see Part 6.2.4);
- Other monitoring as required by EPA (see Part 6.2.5).

Area of Concern 9

The 2015 SWPPP provided had not been revised to identify impaired waters monitoring requirements. Specifically, Section 4.7, Monitoring of SWPPP is checked for benchmark monitoring but not for impaired waters monitoring. Impaired waters monitoring was imposed on the Facility by EPA Region 10 after the development of this SWPPP; however, the SWPPP

should have been revised to reflect this additional monitoring. Additionally, the 2015 SWPPP identifies benchmark monitoring requirements for both Subsector A2 and A4; however, the Facility's operations and SIC code only fall under A4. It did not appear that the Permittee had been sampling for total arsenic and total copper (as required for Subsector A2); however, the SWPPP does identify that these constituents will be monitored.

Section IV – Closing Conference

We held a closing conference with Mr. Velasco at the conclusion of the inspection at approximately 11:50 a.m. During the closing conference, we clearly stated that this summary of observations (i.e., areas of concern) was “preliminary” and subject to addition, deletion, and/or modification. The summary of preliminary inspection observations and areas of concern were communicated with Mr. Velasco.

- Area of Concern 1 – The Inspection Team observed evidence of recent sediment mobilization and stormwater discharge from the Facility to Indian Creek. In general, the Inspection Team observed an overall lack of BMPs deployed along the Facility’s eastern perimeter, directly adjacent to Indian Creek. Multiple industrial activities were present along this perimeter including fuel storage, waste collection, baghouse operations, truck loading/unloading, and outdoor equipment/material storage.
- Area of Concern 2 – The Inspection Team observed sawdust deposition on both impervious and pervious surfaces adjacent to a baghouse located upgradient of an open pipe stormwater outfall, south of Outfall SW1. Additionally, the Inspection Team observed a visible plume of sawdust emissions from the baghouse unit in this area of the Facility, adjacent to Indian Creek.
- Area of Concern 3 – The Inspection Team observed dark staining indicative of oil and grease on the pavement immediately outside a warehouse building in the central portion of the northern parcel and wet oil staining on the ground surface on the southeast side of the northern parcel.
- Area of Concern 4 – The Inspection Team observed a potential for creek water to come in with stormwater discharges at the Outfall SW1 point of sample collection.
- Area of Concern 5 – Monitoring records provided by the Permittee after the inspection were generally incomplete or unreadable.
- Area of Concern 6 – Facility representatives were not aware of the requirement to conduct at least one quarterly routine inspection during wet weather. Inspection documentation produced for 2018, 2019, and 2020 do not demonstrate that at least one inspection was conducted when a stormwater discharge was occurring.
- Area of Concern 7 – The SWPPP site map provided by the Permittee was not inclusive of all elements required by the Permit.
- Area of Concern 8 – The 2015 SWPPP provided by the Permittee had not been revised to identify Mr. Velasco as 1) a member of the stormwater pollution prevention team or as 2) the individual conducting Facility inspections.
- Area of Concern 9 – The 2015 SWPPP provided had not been revised to identify impaired waters monitoring requirements.

The closing conference concluded at approximately 12:05 p.m.

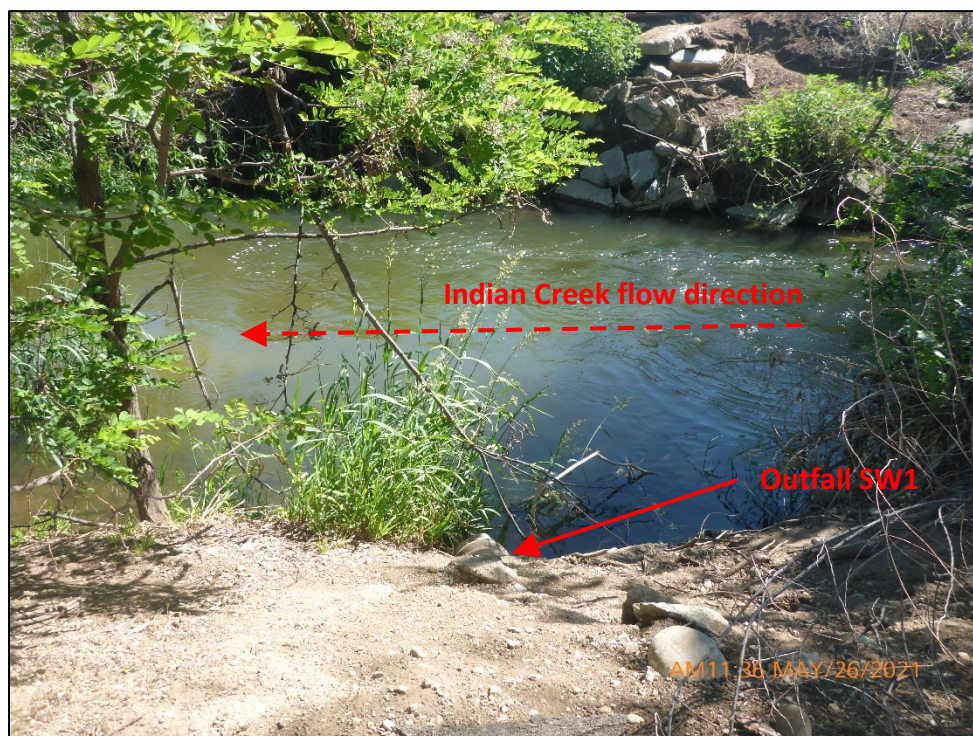
Attachment A – Photograph Log

The photographs were taken during the inspection on May 26, 2021 by Mr. Anthony D’Angelo, PG Environmental, U.S. EPA Contractor, using Panasonic Lumix DMC-TS6 digital camera. Original copies of the photos are on file.

Note: Photo time stamp shown in Eastern Daylight Time (EDT).



Photograph 1. View of Indian Creek along the southeast perimeter of the northern parcel.



Photograph 2. View of Outfall SW1 into Indian Creek along the Facility's eastern perimeter.



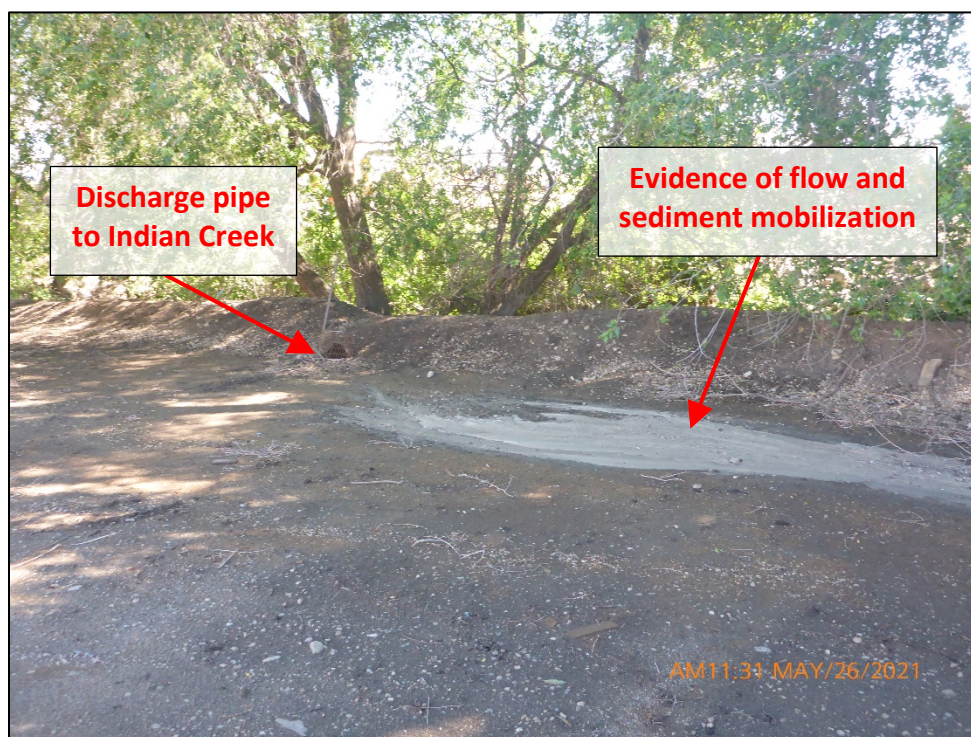
Photograph 3. Additional view of Outfall SW1. The end of pipe was located at the water level of Indian Creek which may impact sampling conducted in this location.



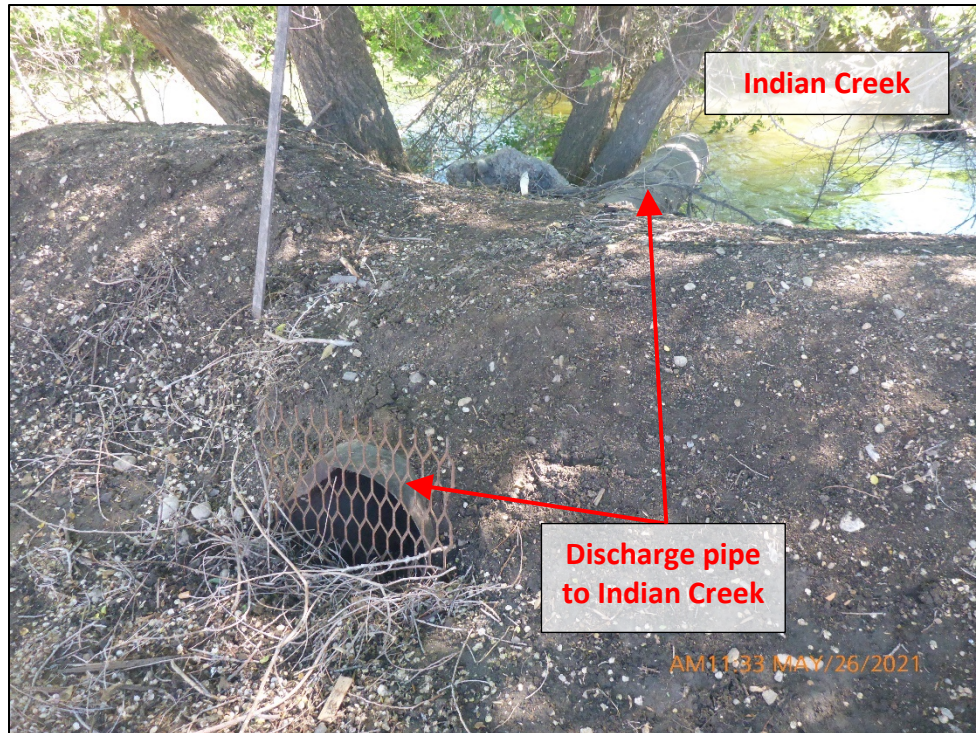
Photograph 4. View of a storm drain located in the central portion of the northern parcel. This storm drain flows through a sand/oil separator and to Outfall SW1 shown in Photographs 2 and 3. Note the portable toilets adjacent to the storm drain which were not on the site map.



Photograph 5. Additional view of the storm drain located in the central portion of the northern parcel, as shown in Photograph 4. Note the trash compactor located upgradient of this storm drain was not identified on the site map.



Photograph 6. View of the unnamed open pipe stormwater discharge point south of Outfall SW1. With the exception of a metal screen, no other BMPs were deployed at this discharge point. Note the evidence of flow and sediment mobilization to the outfall.



Photograph 7. Close-up view of the unnamed open pipe stormwater discharge point south of Outfall SW1, shown in Photograph 6.



Photograph 8. View of the unnamed open pipe stormwater discharge point north of Outfall SW1. With the exception of a metal screen, no other BMPs were deployed at this discharge point. Note the evidence of flow and sediment mobilization to the outfall.



Photograph 9. View, facing northwest, along the Facility's southeast perimeter with Indian Creek. Multiple roof downspouts from the warehouse building are piped underground to Indian Creek. Other discrete overland conveyance discharge points were also observed in this area.



Photograph 10. View of a roof downspout on the warehouse building shown in Photograph 9. This downspout is piped underground to Indian Creek (as depicted in Photograph 11).



Photograph 11. View of the discharge pipe to Indian Creek from the roof downspout shown in Photograph 10.



Photograph 12. View of a discrete overland conveyance discharge point to Indian Creek from the southeastern portion of the northern parcel.



Photograph 13. Close-up view of the discrete overland conveyance discharge point shown in Photograph 12.



Photograph 14. View of the stormwater retention basin and associated storm drain in the northeastern portion of the northern parcel.



Photograph 15. Additional view, facing southwest, of the stormwater retention basin shown in Photograph 14. Note the basin has standing water from a storm even that occurred the night before.



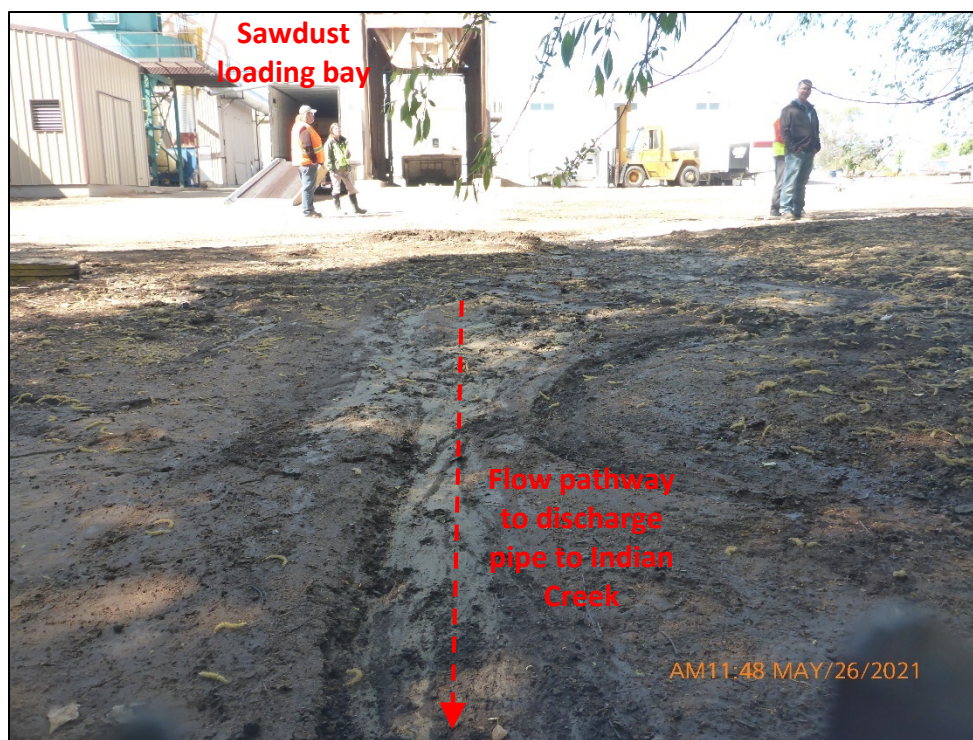
Photograph 16. View of drainage area upgradient of the storm drain that flows to the stormwater retention basin, shown in Photographs 14 and 15.



Photograph 17. View of the baghouse located upgradient of the unnamed open pipe stormwater discharge point (shown in Photographs 6 and 7) south of Outfall SW1.



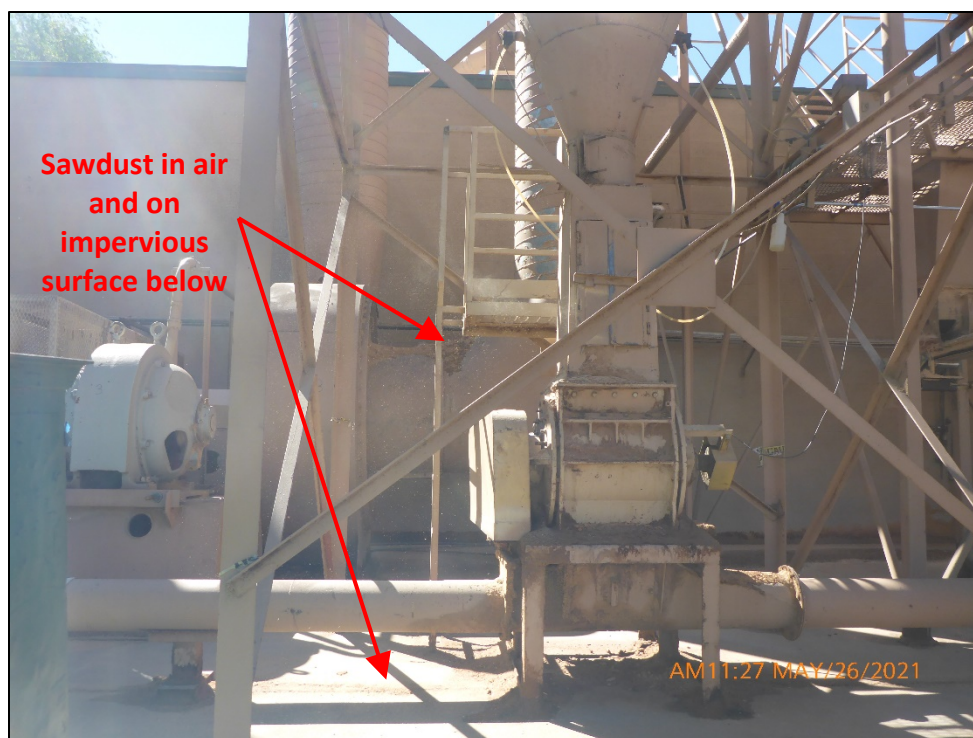
Photograph 18. View of the waste dumpster located upgradient of the unnamed open pipe stormwater discharge point (shown in Photographs 6 and 7) south of Outfall SW1.



Photograph 19. View of the sawdust loading bay located upgradient of the unnamed open pipe stormwater discharge point (shown in Photograph 8) north of Outfall SW1.



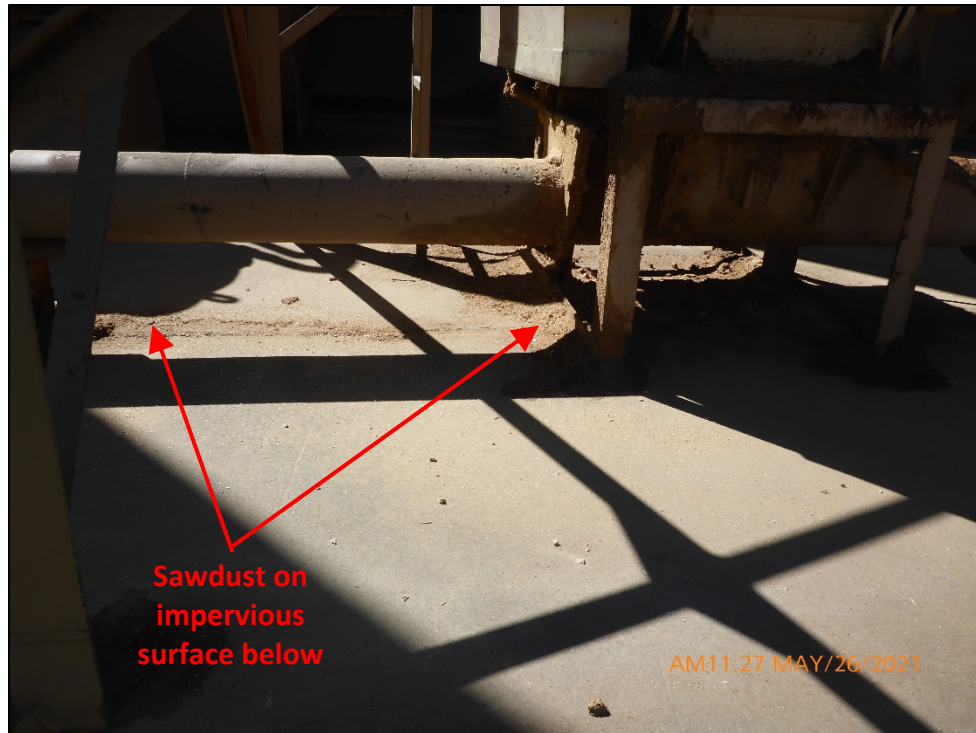
Photograph 20. View of the baghouse shown in Photograph 17, upgradient of the unnamed open pipe stormwater discharge point (shown in Photographs 6 and 7) south of Outfall SW1. Note the visible plume of emissions from the baghouse.



Photograph 21. View of sawdust in the air and on the impervious surface below the baghouse shown in Photographs 17 and 20.



Photograph 22. View of the visible plume from the baghouse shown in Photographs 17, 20, and 21.



Photograph 23. View of sawdust accumulated on the impervious surface below the baghouse shown in Photographs 17 and 20 through 22.



Photograph 24. View of dark residual staining on the pavement surface immediately outside of a warehouse building in the central portion of the northern parcel. Facility representatives stated this staining was from a generator located inside the warehouse building wall.



Photograph 25. Close-up view of the dark residual staining shown in Photograph 24.



Photograph 26. View of the trash compactor upgradient of the storm drain shown in Photograph 5. This trash compactor was not identified on the SWPPP site map provided by the Permittee.



Photograph 27. View of totes of liquid glue stored outside near the trash compactor without overhead coverage or secondary containment. The totes are located upgradient of the storm drain connected to the sand/oil separator and Outfall SW1, as depicted in Photographs 4 and 5.



Photograph 28. Close-up view of the liquid glue tote label shown in Photograph 27.



Photograph 29. View of an outdoor equipment storage area along the central-east perimeter of the northern parcel, near Outfall SW1 and adjacent to Indian Creek. This outdoor storage area was not identified on the site map provided by the Permittee.

Attachment B – Exhibit Log



Exhibit 1. Google Earth Pro image of the Facility (imagery date: 6/29/2017). Call outs and Facility boundaries are approximated for reference.

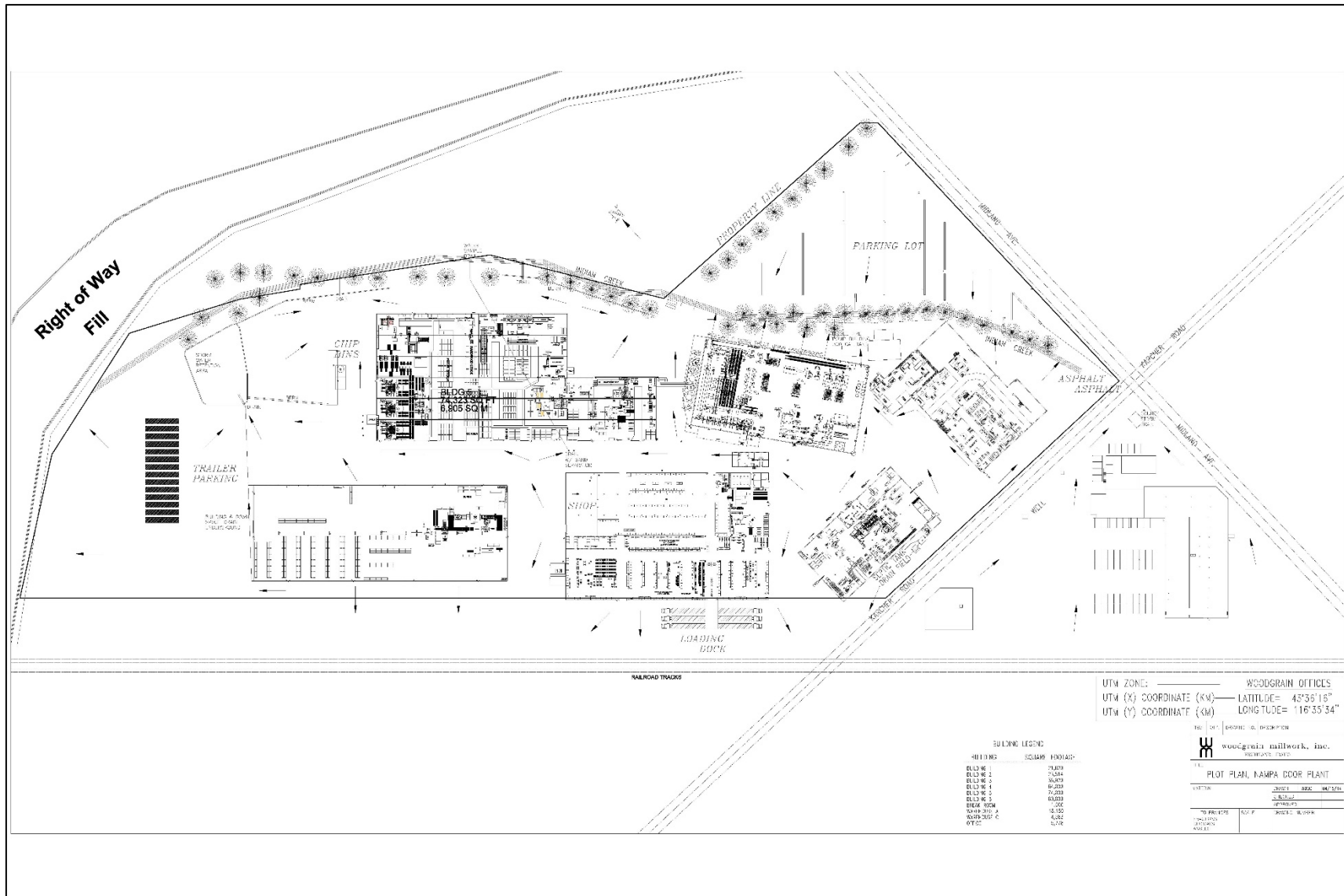


Exhibit 2. May 2021 STORM WATER RUNOFF map provided on May 28, 2021.

[illegible]

Exhibit 3. Electronic version of the Q2 stormwater sampling chain-of-custody which was not readable.



Analytical Laboratories, Inc.

1804 N. 33rd Street
Boise, Idaho 83703
Phone (208) 342-5515

Date Report Printed: 12/27/2019 9:10:27 AM
<http://www.analyticallaboratories.com>
These test results relate only to the items tested.

Laboratory Analysis Report

Sample Number: 1962353

Attn: GREG WOOD
WOODGRAIN MILLWORK
1201 W KARCHER RD
NAMPA, ID 83687

Collected By: G. WOOD

Submitted By: G. WOOD

Source of Sample:
STORMWATER

Time of Collection: 4:10

Date of Collection: 12/12/2019

Date Received: 12/13/2019

Report Date: 12/20/2019

Field pH: Lab pH:
Field Temp: Temp Rec'd in Lab:

PWS#: 3140251

PWS Name: WOODGRAIN MILLWORK NAMPA PLANT

Test Requested	MCL	Analysis Result	Units	MDL	Method	Date Completed	Analyst
Total Phosphate (as P)		0.43	mg/L	0.05	EPA 365.4	12/18/2019	DS
Chemical Oxygen Demand		97.6	mg/L	20.0	EPA 410.4	12/16/2019	JPH
Total Suspended Solids		401	mg/L	2	USGS 1-3765	12/17/2019	EH

Email: gwood@woodgrain.com

CC: SWDH

MCL = Maximum Contamination Level
MDL = Method/Minimum Detection Limit
UR = Unregulated

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Thank you for choosing Analytical Laboratories for your testing needs.
If you have any questions about this report, or any future
analytical needs, please contact your client manager.

Chris d Young

Exhibit 4. Electronic copy of the Q4 2019 stormwater sampling laboratory data from Analytical Laboratories, Inc. Results for E. coli were not present on this laboratory report.

Inspection Date: May 26, 2021