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## North Coast Regional Water Quality Control Board

### INSPECTION MEMO

**Name and Location of Facility Inspected**

Atlas Tree & Landscape Wood Waste Reduction Yard  
5900 Pruitt Avenue  
Windsor, Sonoma County

**Industrial General Permit**

WDID #: 1 49I028845

**Inspection Date**

September 6, 2023

**Inspection Time**

9:00 am – 10:00 am

**Names & Titles of Site Representative**

Aaron Romo, Yard Operator

**Consent for inspection Provided?**

Yes, by Aaron Romo

**Notified of Inspection?**

No, conducted an unannounced inspection for site evaluation.

**Inspector Name & Affiliation**

Farzad Kasmaei, Regional Water Board

**Weather Conditions at the Time of the Inspection:**

Dry weather

**Inspection Memo Prepared By:**

Farzad Kasmaei

## **A. Background**

Atlas Tree and Landscaping Wood Waste Reduction Yard (Discharger) is located at 5900 Pruitt Avenue within the industrial Shiloh Business Park area in the Town of Windsor. The property owner is SOCO Investment LLC, and the Discharger (Legally Responsible Person/LRP) operates the Facility as a tenant. Industrial activities consist of storing wood waste, loading/unloading of wood, grinding, screening, and chipping.

On August 26, 2020, the Discharger filed a Notice of Intent to enroll the Facility for coverage under the General Permit for Storm Water Discharges Associated with Industrial Activities Order 2014-0057-DWQ (Industrial General Permit/IGP) as amended in 2018. The Discharger is required to comply with all the conditions of the Industrial General Permit, including the submittal of annual reports and monitoring data, and payment of fees.

Due to multiple past due annual reports and outstanding invoices for the annual fees, Regional Water Board staff reached out to the Discharger via phone and email several times. Since no response was received, the Regional Water Board staff inspected the site to assess site conditions and attempt to make contact with the Discharger. As a final attempt, on November 17, 2023, the Regional Water Board staff called Lacey Tompioner who is listed in Stormwater Multiple Application & Tracking System (SMARTS) as a Facility Staff. She confirmed that she was no longer with Atlas Tree and that the Facility had been purchased by Anzil Builder<sup>1</sup>. Per Regional Water Board staff request, she provided the contact information and email addresses for the current Facility Staff.

On December 6, 2023, Facility staff, Mr. Paxman, called the Regional Water Board in response to the Regional Water Board's email that was previously sent out. The IGP violations were discussed during the phone conversation.

Per the existing Storm Water Pollution Prevention Plan (SWPPP) uploaded to SMARTS, no discharge or sampling locations have been identified as the Discharger claims that the Facility is designed through grading and berms to be zero.

## **B. Inspection Narrative and Findings**

The Regional Water Board staff arrived on-site at 9:00 am and met Aaron Romo, Facility Staff (yard operator). During the inspection, Mr. Romo was notified that the Discharger is currently in violation of IGP requirements due to several past due annual

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<sup>1</sup> Per Section R of the IGP, Coverage under this General Permit is non-transferrable. When operation of the facility has been transferred to another entity, new PRDs for NOI coverage must be certified and submitted via SMARTS prior to the transfer.

reports and three (3) outstanding invoices. No industrial activities were observed being conducted when the site was inspected.

Wood chips were observed off-site on the ground along the southern property line due to poor housekeeping and inadequate/ineffective minimum BMPs. Inadequate perimeter control BMP installation was observed. Also, a significant amount of wood chips and wood waste were observed on the ground within the Facility yard that can be readily mobilized by contact with stormwater (Pictures 1a and 1b).

No evidence of hydrocarbon spill was observed on the ground within the fueling tank area. However, the Discharger is required to provide spill prevention kits on-site in order to be able to respond to any potential spills. Also, lubricant/greasy construction equipment must be stored in a manner to prevent any spills on the ground specifically during storm events. Wood chips was observed on the ground within this area (Picture 4).

Large, uncovered wood chip and wood waste stockpiles were observed being stored adjacent to the western property line where an ineffective/inadequate perimeter control BMP (concrete blocks) are installed (Picture 6).

Per Regional Water Board staff observation, a portion of the Facility's runoff has the potential to discharge to the adjacent vegetated roadside ditch from the southeast corner of the Facility. Also, a portion of the runoff can be captured by two (2) off-site drain inlets located on the northwest side of the Facility (Picture 10-attached site map). However, no discharge and sampling locations were identified in the SWPPP which would correspond with these discharge points. As a result, the Discharger is required to reassess the Facility to identify any potential sampling points to address such discrepancies and revise the SWPPP accordingly (Pictures 8a, 8b).

## **C. Conclusion**

### **Required Documents:**

1. The Discharger's information in SMARTS has not been updated since 2021. The Discharger is required to ensure that all Permit Registration Documents (PRDs) are updated and uploaded to SMARTS to avoid further violations.
2. The SWPPP is outdated and inaccurate. Site assessment must be conducted to identify the drainage areas and discharge/sampling points.
3. No monitoring data, ad hoc reports or annual reports have been submitted since IGP coverage was obtained in 2020.
4. The existing site map does not reflect the current condition of the site and does not meet the site map requirements in accordance with Section X.E of

the IGP. At minimum, drainage areas, water flow directions, storage and fueling areas, any potential discharge points and on/off sites stormwater conveyance systems must be shown on the site map.

5. All three outstanding invoices must be paid as soon as possible, otherwise the current permit coverage will be terminated administratively by the State Water Board and the Facility will not have any permit coverage.

#### **D. BMP Deficiencies**

Wood chips, wood wastes, and debris was observed on the ground throughout the entire yard and no adequate and effective BMPs were implemented/installed to avoid discharging these fine particles off-site. Poor housekeeping was observed across the entire Facility and uncovered wood chips stockpiles are stored inappropriately. The Discharger is in violation of the IGP requirements for failure to implement the required minimum BMPs.

#### **Attachments:**

- **Photos**
- **Site Map**

#### **Photos:**



Pictures 1a, 1b - Looking north at the Facility's yard where uncovered wood chip stockpiles are stored, and wood chips was observed on the ground at the entire yard. Both pictures indicate an ineffective perimeter control BMP installation. Picture taken by Farzad Kasmaei.



Picture 2- View of significant amount of wood chips on the paved area. Picture taken by Farzad Kasmaei.



Pictures 3a, 3b - View of the wood chips on the ground showing that these fine materials can be washed off easily and discharged into the vegetated roadside ditch. Picture taken by Farzad Kasmaei.



Picture 4 – View of the wood chips on the ground adjacent to the fueling tank area.  
Picture taken by Farzad Kasmaei.



Picture 5 – Looking north at the yard where uncovered wood chips and logs are stored. Wood chips are observed on the ground within the entire yard. Picture taken by Farzad Kasmaei.



Picture 6 – Looking northeast at the wood chips storage area where large wood chips stockpiles are stored adjacent to the western property line with no effective and adequate perimeter control BMPs. Picture taken by Farzad Kasmaei.



Picture 7 – View of log stockpiles and wood waste within the unpaved area. Picture taken by Farzad Kasmaei.





Pictures 8a, 8b – View of a drain inlet on the west side of the Facility that receives Facility's runoff partially. Wood chips were observed on the ground adjacent to this off-site drain inlet. Picture taken by Farzad Kasmaei.



Picture 9 – View of the paved area off-site that indicates wood chips mobilization due to the BMP deficiencies. Picture taken by Farzad Kasmaei.

**Site Map:**



**Off-site  
drain inlets**

**Vegetated  
roadside  
ditch.**

Picture 10 – Site map indicating the Facility’s boundary and existing roadside ditch and off-site drain inlets.