



North Coast Regional Water Quality Control Board

INSPECTION MEMO

Name and Location of Facility Inspected

Scotia Sawmill and Cogeneration Plant, 125 Main Street, Scotia, Humboldt County

Industrial General Permit

WDID #: 1 12I027974

Inspection Dates and time

Date: May 9, 2022

Start time: 9:00 a.m.

End time: 5:00 p.m.

Date: May 10, 2022

Start time: 9:00 a.m.

End time: 4:00 p.m.

Inspector Names & Affiliations

Heaven Moore, North Coast Regional Water Quality Control Board (NCRWQCB)

Chris Watt, NCRWQCB

Farzad Kasmaei, NCRWQCB

Matt Herman, NCRWQCB

Justin McSmith, NCRWQCB

Zane Stromberg, NCRWQCB

Jordan Filak, NCRWQCB

Erin Mustain, State Water Quality Control Board

Kristine Karlson, U.S. EPA

Michael Weiss, U.S. EPA

Names & Titles of Site Representative

Tim Burke, Director Environmental and Safety, Humboldt Sawmill Company (HSC)

Dean Kerstetter, Executive Vice President

Suzanne McClurkin-Nelson, Environmental Specialist, HSC

David Brown, Facility's QISP, Lawrence & Associates

Consent for inspection provided?

Yes, by Dean Kerstetter

Notified of Inspection?

Yes, Regional Water Board staff provided advance notification to Suzanne McClurkin-Nelson

Weather Conditions at the Time of the Inspection: A Qualifying Storm Event occurred during the inspection on May 9, 2022. Weather on May 10, 2022 was clear.

Industrial General Permit No. CAS000001

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Facility Receiving Water Name(s): Eel River

Inspection Memo Prepared By: Farzad Kasmaei

Inspection Picture Notes: The date stamp on the pictures taken by Heaven Moore reads 3/9/2022 and 3/10/2022. This was an error in the date set on the camera and the correct dates are 5/9/2022 and 5/10/2022 respectively.

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Background/Objective:

The Scotia Sawmill and Cogeneration Plant (Facility) property located at 125 Main Street is comprised of approximately 250 acres and is currently operated by the Humboldt Sawmill Company (HSC). Per the Storm Water and Reporting Tracking System (SMARTS), the total area of industrial activities and materials exposed to storm water is approximately 200 acres.

The Facility includes the Sawmill and Cogeneration Plant which are regulated areas under SIC codes 2421 (Sawmills and Planning Mills, General) and 4911 (Electric Services) as both are present at the Facility and regulated by the Regional Water Quality Control Board. The Industrial General Permit (IGP) regulates the stormwater discharges within the entire Facility. Also, HSC is regulated as a CoPermittee under NPDES Permit (No. CA0006017, Order No. R1-2012-006), for its wastewater discharge from the cogeneration plant process water draining to the Log Pond, which is owned by the Scotia Community Services District.

The HSC property also includes an asphalt plant that was previously owned and operated by Humboldt Redwood Company (HRC) until July 1, 2018, when Humboldt Sawmill Company, LLC (HSC) began operating the sawmill and cogeneration plant as a new Legally Responsible Person (LRP)/operator. Therefore, a new Notice of Intent (NOI) was filed to obtain coverage for the Sawmill and Cogeneration Plant in 2018 by HSC.

The HRC maintained the old NOI coverage for the asphalt plant as an existing operator/LRP. However, during the inspection, the Regional Water Board was notified that the asphalt plant has been operated by a tenant, Kansas Asphalt Timber Operations, since July 2021. As a result, the Regional Water Board notified Suzanne McClurkin-Nelson, who acts as the environmental consultant to both HSC and HRC that Kansas Asphalt needs to file a new NOI to obtain coverage for their industrial activities. Suzanne emailed the CEO of Kansas Asphalt, Chuck Jeffries, and included Farzad Kasmaei to notify him of this issue.

Due to Annual NAL (Numeric Action Level) exceedances for Iron (Fe) in 2018 and 2019, the facility is currently in Level 2 status for this analytical parameter. However, per the Level 2 ERA Technical Report, the Discharger has selected the combination of the Non-Industrial Pollutant Source Demonstration and Industrial Activity BMP demonstration and claimed that the facility receives a significant amount of run-on from adjacent properties and via direct connections to the Town of Scotia's storm drain system.

Due to the size and complexity of the Facility the inspection spanned two days. All drainage area references within this report refer to the Facility Site Map, uploaded by the Discharger into SMARTs.

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The Facility's runoff within Drainage Area 1 and Drainage Area 7 are mostly captured in onsite storm drain inlets that then discharge into a large Pond¹ before discharging to the Eel River. This storm drain system also receives run-on from Highway 101 and runoff from the Boneyard Area on the east side of the highway which is also owned and operated by HSC.

The runoff within the Air-Dry Yard drains to multiple sediment traps and then discharges into a small retention pond located on the east side of the highway 101.

The multiple retention ponds throughout the facility are used as stormwater containment and discharge reduction (advanced) BMPs. Suzanne McClurkin-Nelson and David Brown stated these ponds are unlined and that they were not designed, but rather were simply built in the space available.

As the date of this report, no technical documents or design calculations have been provided by the Discharger to indicate that these retention ponds, which are considered to be advanced/infiltration BMPs under the IGP, meet the Design Storm Standards requirements in accordance with Section X.H.6 of the IGP.

Additionally, the Discharger has not selected the "On-Site Compliance Option," included as Attachment I of the IGP. As such, the Discharger has not conducted the required monitoring and characterization of the Facility's industrial stormwater prior to infiltration to groundwater, nor completed the associated required technical reports to ensure the protection of groundwater.

The receiving water for the Facility is the Eel River, which is listed as impaired on the 303(d) list in Appendix 3 of the IGP for the following parameters: Dissolved Oxygen, Aluminum, Sedimentation/Siltation and Temperature.²

The facility has five identified discharge points to the Eel River. Per the site map uploaded to SMARTS, these discharge points include discharge points from the main retention pond (associated with monitoring location 007A), the tree plantation area (associated with monitoring location 007C) on the south side of the facility, a riparian area on the southwest corner of the Log Pond (monitoring location 002), discharge from installed valve system within the paved Log Deck (monitoring location 001), and a potential discharge point on the west side of the Drainage Area 3.

There is the potential for direct discharge from the main retention pond into the Eel River through the use of the existing skimmer system or the emergency diversion gate which are installed in the northwest corner of the main retention pond.

¹ Labeled "retention pond" in the attached site maps.

² The Excel spreadsheet is available on the Industrial Storm Water program pages of the State Water Resources Control Board's website (<http://www.waterboards.ca.gov/>).

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Inspection Observations:

On May 9 and 10, 2022, Regional Water Board staff, in the company of staff from State Water Board and U.S. EPA (Inspection Team), inspected the Facility to evaluate whether the Facility is in compliance with the applicable permit requirements.

On May 9th the Inspection team arrived at the Facility at approximately 9am. After staff signed into the facility as visitors, we met Tim Burke, Director of Environmental and Safety, Humboldt Sawmill Company (HSC), Dean Kerstetter, Executive Vice President, Suzanne McClurkin-Nelson, Environmental Specialist, HSC, and David Brown, Facility's QISP, Lawrence & Associates, collectively referred to as the Site Representatives. We spent the first hour or so in the conference room doing introductions, discussing the objective of the inspection, looking at site maps, discussing the Facility operations, layout, and discharge points, and planning out what we wanted to see first.

The Inspection Team drove over to the Employee Parking area and walked to the east side of the facility, between the Sawmill/Planer Buildings to the South and the Former Construction Annex and Former Lumber Storage Building to the North (Drainage Area 1). It was raining as the inspection began.

Staff walked toward the west side of the facility to inspect Drainage Areas 1 and 7 including the paved log deck. The Facility's runoff within Drainage Area 1 is mostly captured by storm drain drop inlets (DIs) that then drains to an existing diversion valve 001 located on the west side of the facility. Also, the diversion valve receives a portion of the runoff within the Drainage Area 7 (Log Deck) and then discharge into the southern retention pond (Main Retention Pond). We continued East into the Paved Log Deck where the finish products are temporarily stored in Drainage Area 1.

Within this portion of the Facility, the inspection group observed finished product stored on the pavement adjacent to the Employee Parking area, many storm drain inlets within Drainage Area 1 were observed receiving very muddy discharge, discharges with observable oil sheen, and most inlets had no inlet protection BMPs (See photos 1a, 1b, 1c, 1d, 1j). Some inlets were actually observed with many inches of debris, mud, and wood fiber accumulated over the lids and adjacent to the inlets (Photos 1f, 1g, 1h). Many inlets were significantly damaged (Photos 1b, 1c), and in some cases had been lifted and propped open (Photo 1i). Those storm drain inlets that did have BMPs around them were ineffective at preventing the discharge of pollutants (Photos 1e, 1f).

Pollutant sources including industrial equipment and wastes (Photos 2a, 2b, 2c, 2d, 2e, 2f, 2g, 2h, 2i, 2j), stockpiles of materials (Photos 3a, 3b, 3c, 3d, 3e), as well as high quantities of mud, wood fiber, and bark were observed throughout the facility (Photos 4a, 4b, 4c, 4d) exposed to rain without effective BMPs and controls.

The Discharger was directed to implement housekeeping and source control effectively. We discussed that good housekeeping is a practical, cost-effective way to maintain a

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clean and orderly facility to prevent pollution sources from coming into contact with stormwater.

The inspection group then walked down to the Main Retention Pond and Tree Plantation Areas. While walking across paved Log Deck accumulated mud, wood fiber, and bark was so deep it was difficult to walk through as it came up over the top of some staff's boots. The paved surface was not visible (Photos 4a, 4b, 4c, 4d). It began to rain heavily during this part of the inspection.

The Main Retention Pond receives the majority of the runoff from Drainage areas 1 and 7 as well as Drainage area 5 on the north side of highway 101 prior to discharging to the Eel River. The main outlet structure was open and discharging. The water in the pond and the discharge appeared to be highly turbid, dark, and had a gray hue, and foam was observed on the surface (Pictures 5a, 5b, 5c, 5d, 5e, 5f, 5g and 6a, 6b, 6c, 6d, 6e, 6f, 6g, 6h, 6i). When asked by Heaven Moore if the retention pond had been designed to a particular design storm standard and if the design plans and calculations could be provided, Facility staff, Dean Kerstetter, stated that it had not been designed but had rather been sized based on the space available.

In addition to the outlets, water is also pumped out of the retention pond using a portable pump and discharged into the tree plantation area. This area is flooded to allow for infiltration and is bordered by a collection swale³ (Picture 7a, 7b, and 7c).

At this point it was raining very heavily. The Inspection Team decided to this portion of the inspection as it was getting late in the day and we needed to meet with the Scotia CSD to conduct that inspection as well. We agreed to return the next morning to see the rest of the Facility.

On May 10, 2022 (day 2), the Inspection Team returned, signed in, and then planned out the remaining portions of the inspection. It was not raining during this day of inspection.

The Inspection Team first inspected the Asphalt Plant, which is documented under a separate inspection report as it is a separately operated and permitted facility. The Inspection team then drove to the north side of Highway 101 and inspected the upper yard including the Boneyard and Air-Dry yard in Drainage Area 7.

Multiple small sediment traps (Picture 9a) are located along the downslope edge of the Air-Dry Yard. The runoff then drains into a small retention pond downstream on the south side of the Boneyard (Pictures 9b, 9c). This runoff ultimately discharges to the Main Retention Pond (Picture 5e) before discharging to the Eel River. Many of the small sediment traps as well as their outlet pipe and storm drain are not shown on the facility site map. The Bone Yard contained old pieces of equipment and rusty metal that was

³ Labeled "overflow trench" in the attached site map.

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exposed to rain. No BMPs were present. This retention pond is also not designed or sized, according to Facility Staff.

The Inspection Group then returned to the main facility on the south side of Highway 101 to inspect the Fueling Station area on the north side of the Facility in Drainage Area 3. The fueling area was uncovered, and secondary containment was only provided on one of the fuel tanks. This containment berm had its capacity reduced due to standing stormwater from the rain event the previous day. Facility staff were unable to determine if the inlets within and adjacent to the fueling station discharged to storm drain or sewer (Pictures 10a, 10b).

The Inspection Team also observed storm drain inlets, including the sampling point 003 (Picture 11) in the vicinity of the fueling station (Picture 12a, 12b). Facility staff stated that the storm drain inlet referred to as sampling point 003 receives run-on from the adjacent city streets and neighborhood and that it can be challenging to sample as a result.

Next the Inspection Team inspected the vehicle maintenance and wash bay areas. The vehicle maintenance area (Picture 13a, 13b) is covered. The vehicle wash bay is also covered, and Facility staff stated that the drain discharges to sewer (Picture 13c). However, Facility staff stated that many of their large trucks and equipment is too large or tall to use the wash bay, so instead they conduct washing in the area immediately adjacent (Picture 14a). The material that is washed from the equipment and vehicles is than stockpiled and removed as hazardous material every three to six months. A partially covered stockpile was observed, as well as loose material on the pavement within this area (Picture 14b). While a few straw wattles and oil absorbing booms were observed which appeared to be recently placed within the flow path from this area toward the Log Pond, loose material was seen beyond the BMPs and concrete k-rail (Picture 14c).

A portion of this area used for outdoor vehicle and equipment washing drains to two storm drain inlets that are located at the back corner of the wash bay building (Picture 14a, 14b). One of these storm drain inlets had a straw wattle and oil absorbing boom placed around it, the other inlet was unprotected and propped open. Sediment material which appeared to have come from the outdoor wash area was present around both inlets (Picture 15).

The Inspection Group then walked down to north side of the Cogeneration Area (Drainage Area 2) where the non-combustible residue of combustion, referred to as bottom ash, was stored in unprotected stockpiles. The bottom ash stockpiles were mostly uncovered; however, most of the inlets that receives runoff from these areas were protected with fiber rolls (see pictures 16a and 16b).

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Ponded stormwater was present in the northeast side of the Cogeneration area. This ponded area receives stormwater runoff from Cogen area as well as from the outdoor vehicle wash area shown in photos 14a-c. Thick dark mud and oil sheen was visible and the water had a strong hydrocarbon smell (Picture 17a). Oil and hydrocarbon staining was on the ground around and on top of the unprotected storm drain inlets beneath cogeneration equipment (picture 17b, 17c). The area had a strong smell of hydrocarbons.

Also, the Discharger has constructed a berm using the bottom ash materials along west side of the Cogen area to minimize the wastewater discharge points to Town of Scotia Pond (see pictures 18a, 18c and 18d). This bottom ash material is a fine and highly erodible material that has the potential to be a pollutant source that can contribute fines and sediment into the discharge. Bottom ash can also have other pollutants such as metals. This material needs to be treated as a pollutant source and protected from stormwater and prevented from discharging. We discussed this issue with Facility staff.

A number of large chemical storage tanks of sulfuric acid and hypochlorite were located in the Cogeneration area adjacent to the Log Pond (Pictures 19a, 19b, 19c). These tanks had no secondary containment or any other BMPs.

Some of the inlets within the Cogen area were not protected and the wood chips on the ground indicates that a poor housekeeping implemented in this area (see picture 19d). This area is currently under the individual NPDES permit coverage to regulate the wastewater discharges.

The process water from the cogeneration area is separately regulated as a wastewater discharge under NPDES Permit No. R1-2012-0065. This permit applies to process water only and does not authorize the discharge of stormwater to the Log Pond. A separate inspection report documents the findings under that permit.

The inspection group walked through facility's yard in Drainage Area 2 on the east side of the facility. Significant amount of wood chips was observed on the ground which means that the housekeeping is not implemented within this area (Pictures 20a, 20b). Standing stormwater in this area was dark brown and had a visible oil sheen (Picture 20c). The Inspection team also identified many storm drain inlets along the Planer Building that Facility that were not included on the site map (Picture 20d).

Also, the inspection group inspected the newly installed clarifier on the south side of the Machine Shop building where the samples are collected (SWDB 3B). Per the attached site map, this clarifier has been installed to treat the runoff that are captured by storm drain inlets throughout the sawmill yard in Drainage Area 2 (Pictures 21a, 21b). When asked by Heaven Moore if the clarifier had been designed to a particular design storm standard and if the design plans and calculations could be provided Suzanne McClurkin-Nelson stated that it had not been designed but had rather been sized based on the space available. This feature works through the use of a baffle and weir to

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physically separate solids and floatable material. No chemical process or flocculants are used. Grab samples are collected from the last chamber, which was mostly full from the rain event the previous day (Picture 21c). No continuous process monitoring is utilized. Facility staff were unsure when the feature had last been maintained and could not provide a maintenance plan or schedule.

Finally, the western discharge location 002 where the samples are collected prior to discharge to the Eel River was inspected (See picture 22).

Conclusions:

The facility is not compliant with the Industrial Stormwater Permit requirements in a number of significant ways. The Facility has an overall lack of housekeeping, source control, sediment and erosion controls, protection of stockpiles, storm drain inlet protection, and control of discharge. The majority of the site was covered in mud, wood fiber, bark and in many cases oil sheen. Stockpiles were unprotected. Inlets were generally unprotected and those BMP's that were observed appeared to be recently installed. The advanced BMPs, including all ponds and the storm water clarifier were not properly designed as an advanced BMP per the IGP and have not been maintained.

As a result, advanced BMP's including all ponds and the clarifier require sizing calculations and design as well as maintenance plans to ensure their proper operation. The observed comingling of industrial stormwater discharge with wastewater process water which is separately permitted is also of significant concern and unauthorized.

The discharge of highly turbid stormwater runoff was observed entering into the storm drain system throughout the facility as well as discharging from the main retention pond to the Eel River.

Therefore, the facility needs significant improvements in order to come into compliance with the industrial stormwater permit and prevent the discharge of pollutants to the Eel River.

In addition, the facility site map is incorrect, with many missing inlet unidentified discharge points, incorrectly annotated drainage areas, missing drainage areas, a lack of identification of storm water run on, and an absence of some features entirely. The Storm Water Pollution Prevention Plan (SWPPP) needs to be revised to fully reflect the current site conditions, pollutant sources, best management practices, and control features. This SWPPP also needs to include maintenance plans of these features and BMP's. Monitoring locations need to more precisely be identified within the SWPPP and monitoring of all locations must be conducted as required by the IGP.

The Facility needs to locate all utilities and clearly identify the storm drain collection system including all inlets, pipes, and outlets. This may include field evaluation through CCTV or other means. The Facility needs to also locate and clearly identify the sewer

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system and ensure that no cross connection exist. The need to ensure that no discharge of stormwater to the sewer system or process water to the storm drain system is occurring.

The use of bottom ash material as a BMP in the form of a berm along the edge of the log pond is inappropriate as this material is a pollutant source. This material should be removed and protected from stormwater runoff. The facilities pollutant source identification should be revised to include additional pollutant sources including, but not limited to, bottom ash material, sulfuric acid, hyperchloremic, fuels, and the materials washed from equipment in the area adjacent to the wash area. Additional pollutant controls are necessary in the fueling area as well as the cogeneration area and.

The Facility also needs to take steps to properly permit and manage the asphalt plant. This work has since been undertaken and completed.

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Attachment(s):

1. Pictures
2. Site maps

Pictures:



Pictures 1a, 1b: Storm drain inlets within drainage area 1 observed receiving very muddy discharge, many with observable oil sheen and had no inlet protection BMPs. Picture taken by Heaven Moore.

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Picture 1c: Storm drain inlet within drainage area 1 observed receiving very muddy discharge, many with observable oil sheen and had no inlet protection BMPs. Picture taken by Heaven Moore.

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Picture 1d: Oil sheen upstream of storm drain inlet shown in Picture 1c above, which had no inlet protection BMPs. Picture taken by Heaven Moore.

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Picture 1e: Storm drain inlets within drainage area 1, with straw wattles incorrectly installed on pavement. Note the accumulated material on the paved surface that is so deep that erosion rills can be seen that demonstrated discharge is going under the straw wattle. Oil sheen be seen as well. Picture taken by Heaven Moore.



Pictures 1f and 1g: Storm drain inlets within drainage area 1 observed with no inlet protection BMPs and surrounded by wood waste material. Picture taken by Heaven Moore.

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Picture 1h: A storm drain inlet is located within this area in drainage area 1. The storm drain inlet and the adjacent area is covered with many inches to feet of debris, mud, wood fiber, and unprotected stockpiled material. No housekeeping BMPs or inlet protection BMPs are present. Picture taken by Heaven Moore.

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Picture 1i: Storm drain inlet within drainage area 1 observed with many inches of debris, mud, and wood fiber accumulated over the lid and adjacent to the inlet with no inlet protection BMPs. Note the piece of lumber inserted into the storm drain lid and that the lid is askew. Picture taken by Heaven Moore.

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Picture 1j: A storm drain inlet is located within drainage area 1. The storm drain inlet and the adjacent area is covered with many inches to feet of debris, mud, wood fiber, and unprotected stockpiled material. No housekeeping BMPs or inlet protection BMPs are present. Picture taken by Heaven Moore.

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Pictures 2a and 2b: Industrial equipment, materials, and waste located within drainage area 1 exposed to rain. This paved area is covered with many inches debris, mud, wood fiber. No housekeeping BMPs or inlet protection BMPs are present. Picture taken by Heaven Moore.

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Picture 2c: Industrial equipment, materials, and waste located within the log deck area in drainage area 1 exposed to rain. This paved area is covered with many inches debris, mud, wood fiber. No housekeeping BMPs or inlet protection BMPs are present. Picture taken by Heaven Moore.

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Pictures 2d and 2e: Industrial equipment and associated oil sheen in drainage area 1 exposed to rain. This area is covered with many inches debris, mud, wood fiber and directly adjacent to unprotected storm drain inlets. No housekeeping BMPs or inlet protection BMPs are present. Picture taken by Heaven Moore.



Pictures 2f and 2g: View of wood particles that are stored outside within log deck area and exposed to rain. Source control is not implemented. Picture taken by Heaven Moore.

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Pictures 2h and 2i: Large industrial waste material piles and stockpiles located within the log deck area of drainage area 1 exposed to rain. This paved area is covered with many inches debris, mud, wood fiber. No BMPs are present. Picture taken by Heaven Moore.

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Picture 2j: Looking southwest at conveyer belts adjacent to the log deck area. Wood chips was observed on the ground throughout the paved area. Picture taken by Farzad Kasmaei.



Pictures 3a and 3b: View of wood chips stockpiles stored outside by the sawmill building exposed to rain. Picture taken by Farzad Kasmaei.

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Pictures 3c and 3d: Large material stockpiles located within the log deck area of drainage area 1 exposed to rain. This paved area is covered with many inches debris, mud, wood fiber. No BMPs are present. Picture taken by Heaven Moore.

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Picture 3e: Large material stockpiles located within the log deck area of drainage area 1 exposed to rain. This paved area is covered with many inches to feet of debris, mud, and wood fiber. No BMPs are present. Picture taken by Heaven Moore.



Photo 4a and 4b: View of highly turbid runoff and thick mud on the paved log deck. Picture taken by Farzad Kasmaei.

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Pictures 4c and 4d: Closeup photos showing the depth of the mud, wood fiber, bark, and ponded stormwater on top of the paved log deck. The main retention pond receives runoff from this area. Picture taken by Heaven Moore.



Pictures 5a and 5b: Picture of the retention pond that receives the majority of the runoff from Drainage areas 1 and 7 as well as Drainage area 5 on the north side of highway 101 prior to discharge to the Eel River. Picture taken by Heaven Moore.

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Pictures 5c and 5d: View of stormwater pipes discharging the runoff into the north corner of the main retention pond. These pipes mostly receive runoff from the diversion valve 001 and the DIs within drainage areas 1 and 7 as well as Drainage area 5 on the north side of highway 101. The water appeared to be highly turbid, dark, and had gray hue. Foam was observed on the surface. Picture 5c taken by Farzad Kasmaei. Picture 5d taken by Heaven Moore.

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Picture : View of bubble-up stormwater pipe discharging runoff from Drainage area 5 on the north side of highway 101 into the retention pond. The water appeared to be highly turbid, dark, and had gray hue. Picture taken by Heaven Moore.

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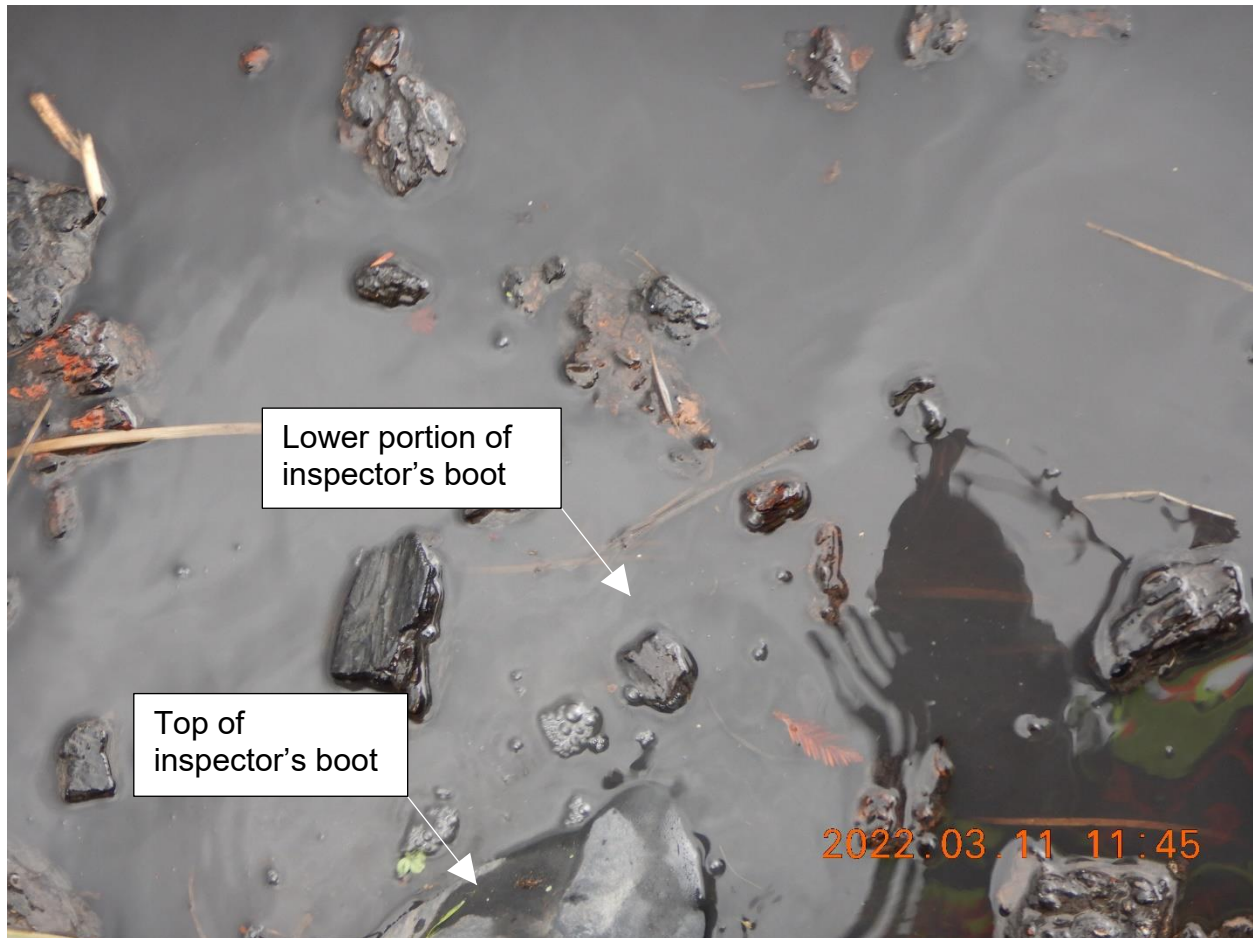
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Picture 5f: View of runoff discharging into the retention pond from the access road along the north edge. The water appeared to be highly turbid, the bank was significantly incised, and the small piece of straw wattle appeared to be ineffective. Picture taken by Heaven Moore.

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Picture 5g: Closeup of Heaven Moore's boot just under the water within the retention pond. The water appeared to be highly turbid, dark, and had gray hue. The water is so opaque that the lower portion of her boot is not visible just below the surface. Picture taken by Heaven Moore.

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Pictures 6a and 6b: Picture of the outlet structures within retention pond to the Eel River. The outlet structure controlled by the pulley suspended by the green cantilever structure was open and discharging. The overflow with the red gate valve was closed at the time of inspection. The vertical corrugated metal riser pipe is a passive high flow bypass. Picture 6a taken by Heaven Moore. Picture 6b taken by Farzad Kasmaei.

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Picture 6c: Picture of the outlet pipes from the retention pond to the Eel River, which is visible in the background. The black corrugated plastic pipe is connected to the overflow with the red gate valve was closed at the time of inspection. The smaller corrugated metal pipe is connected to the outlet structure controlled by the pully suspended by the green cantilever structure and was open and discharging. Picture taken by Farzad Kasmaei.

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Picture 6d: Picture of the black corrugated plastic pipe that is connected to the overflow with the red gate valve was closed at the time of inspection. Picture taken by Heaven Moore.

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Picture 6e: Picture of the outlet pipe from the retention pond to the Eel River. The corrugated metal pipe is connected to the outlet structure controlled by the pulley suspended by the green cantilever structure and was open and discharging. The discharge appeared to be highly turbid, dark, and had gray hue. Foam was observed on the surface. Picture taken by Heaven Moore.

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Picture 6f: Looking northwest at discharge point (outfall) from the main retention pond. The discharge water from the retention pond drains directly into Eel River which is just beyond the view of the picture. Picture taken by Farzad Kasmaei.



Pictures 6g and 6h: Picture discharge from the retention pond to the Eel River. The discharge appeared to be highly turbid, dark, and had a gray hue. Foam was observed on the surface. Pictures taken by Heaven Moore.

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Picture 6i: Picture discharge from the retention pond into Eel River which is just beyond the view of the picture. The discharge appeared to be highly turbid, dark, and had a gray hue. Foam was observed on the surface. Picture taken by Heaven Moore.

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Picture 7a: Water being pumped from the retention pond with a portable pump and being discharged into the tree plantation area. Picture taken by Heaven Moore.

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Picture 7b: Water that has been pumped from the retention pond with a portable pump and discharged into the tree plantation area. Picture taken by Farzad Kasmaei.

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Picture 7c: Water that has been pumped from the retention pond with a portable pump and discharged into the tree plantation area, shown on the right of the picture, and the swale on the left of the picture. Picture taken by Heaven Moore.

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Pictures 8a, 8b: Unprotected inlet that receives runoff from the down spouts of the sawmill building and paved area within the drainage area 1. Picture taken by Farzad Kasmaei.



Picture 9a: Looking west at one of the sediment traps in air dry yard. Picture taken by Farzad Kasmaei.

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Picture 9b: Boneyard that discharges to small retention pond. Picture taken by Farzad Kasmaei.

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Picture 9c: Looking south at small retention pond in boneyard that receives runoff from upstream sediment traps via corrugated pipe shown on the photo. Picture taken by Farzad Kasmaei.



Pictures 10a and 10b: Onsite fueling station. Facility staff were unsure if the adjacent inlets were storm drain or sewer. Secondary containment not provided on all tanks/fuel. Accumulated water in concrete containment area diminished by accumulated stormwater. Picture taken by Farzad Kasmaei.

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Picture 11: Looking east at catch basin 003 where the samples are collected. This catch basin receives facility's runoff from northern areas of the facility as well as highway runoff. The catch basin open spaces have been covered with Filtrexx. Picture taken by Farzad Kasmaei.

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Pictures 12a, 12b: Looking southeast at storm drain inlets on north side of the facility in drainage area 3. Some of the fiber rolls installed around the inlets are old and in need of maintenance. Picture taken by Farzad Kasmaei.



Pictures 13a and 13b: View of covered vehicle maintenance area. Picture taken by Farzad Kasmaei.

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Picture 13c: View of covered vehicle wash area. Facility staff stated that drain within this area discharges to sewer. Picture taken by Farzad Kasmaei.

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Picture 14a: View of area adjacent to vehicle wash bay area. Water flow directions are shown with red arrows on the photo. Note the storm drain inlet (Photo 15) behind the maintenance shed receives runoff from this area. Picture taken by Farzad Kasmaei.

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Picture 14b: Partially covered stockpile of the material that is washed from the equipment and vehicles is then stockpiled and removed as hazardous material every three to six months. Material is also present on the pavement. Water flow directions are shown with red arrows on the photo. Picture taken by Farzad Kasmaei.

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Picture 14c: Material that is washed from the equipment and vehicles on the pavement both within the designated area, as well as beyond the BMPs and concrete k-rail. Straw wattles and oil absorbing booms appear recently placed and are ineffective at containing the material. Water flow directions are shown with red arrows on the photo. Picture taken by Farzad Kasmaei.

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Picture 15: Storm drain inlets located behind the vehicle maintenance area, wash bay, and outdoor wash area. A fiber roll and Filtrex oil absorbing boom have been installed around the inlet in the foreground, but the inlet in the background is unprotected and propped open. Picture taken by Farzad Kasmaei.



Pictures 16a, 16b: View of uncovered bottom ash stockpiles on the north side of the Cogen area and the storm drain inlet that receives runoff from this area. Picture taken by Farzad Kasmaei.

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Picture 17a: Poned stormwater in the northeast side of the Cogeneration area. This area receives stormwater runoff from Cogen and outdoor vehicle wash areas shown in photos 14a-c. Thick dark mud and oil sheen was visible and the water had a strong hydrocarbon smell. This area discharges to downstream storm drain inlets and then into the Log Pond. The bottom ash stockpiles in the background are unprotected and would also discharge into the Log Pond. Picture taken by Farzad Kasmaei.

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Picture 17b: View of the cogeneration operational area and a storm drain drop inlet within the paved area that drains to the Log Pond. Oil and hydrocarbons can be seen around and on top of the inlet. The area had a strong smell of hydrocarbons. This storm drain inlet discharges into the Log Pond. Picture taken by Farzad Kasmaei.

Discharge to Eel River

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Picture 17c: Looking east at equipment shed within the paved cogeneration area. Observed sawdust and tracking on the ground, oil and hydrocarbon can be seen on the ground throughout this area and under the equipment. The area had a strong smell of hydrocarbons. The bottom ash stockpiles to the left of the image are unprotected and would also discharge into the Log Pond. The ponded stormwater from photo 17a can be seen behind the equipment on the right side of the picture and the storm drain inlet from photo 17b above is just beyond the date stamp to the right of this picture. Picture taken by Farzad Kasmaei

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Picture 18a: Looking north at cooling tower and a constructed berm using the bottom ash materials along the west side of the Cogen along the edge of the Log Pond. Picture taken by Farzad Kasmaei.

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Picture 18b: Open storm drain inlets which allow comingling of industrial stormwater with Cogeneration processes wastewater. Picture taken by Farzad Kasmaei.

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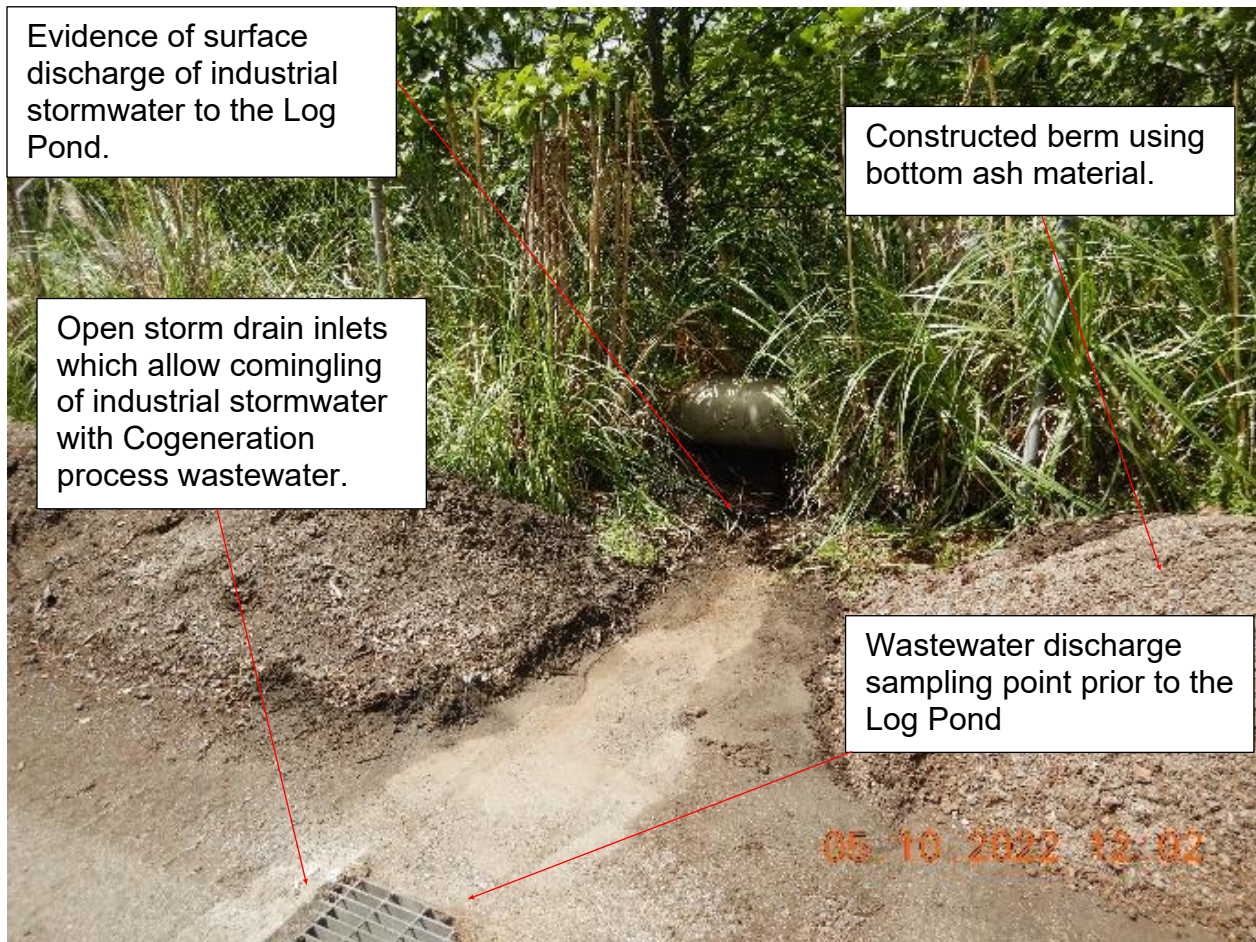
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Picture 18c: Open storm drain inlets which allow comingling of industrial stormwater with Cogeneration processes wastewater. Berm constructed from bottom ash material the edge of the Log Pond. Picture taken by Farzad Kasmaei.

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Picture 18d: Wastewater sample location and discharge point to the Log Pond with an open storm drain inlet which allow comingling of industrial stormwater with Cogeneration processes wastewater. Berm constructed from bottom ash material the edge of the Log Pond. Clear evidence of surface discharge of industrial stormwater to the Log Pond. Picture taken by Farzad Kasmaei.

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Picture 18e: Constructed berm made of bottom ash materials along the edge of the Log Pond. Picture taken by Farzad Kasmaei.

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Picture 19a: Large sulfuric acid chemical storage tank without secondary containment or any other BMPs. Located in the Cogeneration area adjacent to the Log Pond. Picture taken by Farzad Kasmaei.

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Picture 19b: Large sulfuric acid chemical storage tank without secondary containment or any other BMPs. Located in the Cogeneration area adjacent to the Log Pond. Picture taken by Farzad Kasmaei.

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Picture 19c: Large hypochlorite chemical storage tank without secondary containment or any other BMPs. Located in the Cogeneration area adjacent to the Log Pond. Picture taken by Farzad Kasmaei.

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Picture 19d: View of unprotected storm drain inlet within Cogeneration area and significant amount of woodchips all around the inlet. Poor housekeeping is implemented within this area. Picture taken by Farzad Kasmaei.

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Picture 20a: Looking South at sawmill yard in Drainage Area 2. Wood chips and sawdust accumulations were observed outside throughout the yard as well as unprotected stockpiles. Picture taken by Farzad Kasmaei.

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Picture 20b: Portion of Drainage Area 2. Wood chips and sawdust accumulations were observed outside throughout the yard as well as unprotected stockpiles. Picture taken by Farzad Kasmaei.

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Picture 20c: Looking South at sawmill yard in Drainage Area 2. Standing stormwater in this area was dark brown and had a visible oil sheen. Picture taken by Farzad Kasmaei.

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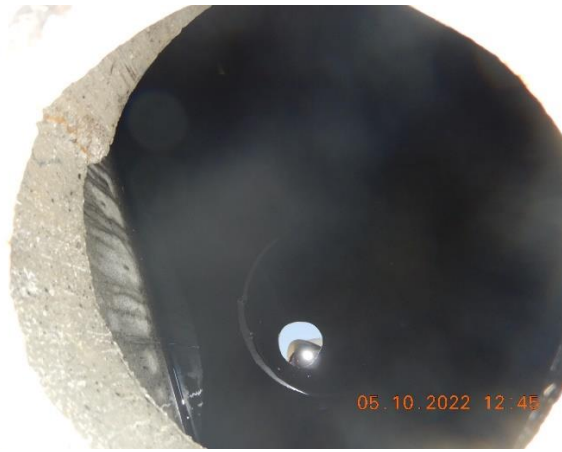
Picture 20d: Numerous storm drain inlets along the Planer Building that were not mapped on the site map. Picture taken by Farzad Kasmaei.

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Picture 21a: Newly installed clarifier on the south side of the Machine Shop building where the samples are collected (SWDB 3B). Picture taken by Farzad Kasmaei.



Pictures 21b, 21c: Newly installed clarifier on the south side of the Machine Shop building where the samples are collected (SWDB 3B). Picture taken by Farzad Kasmaei.

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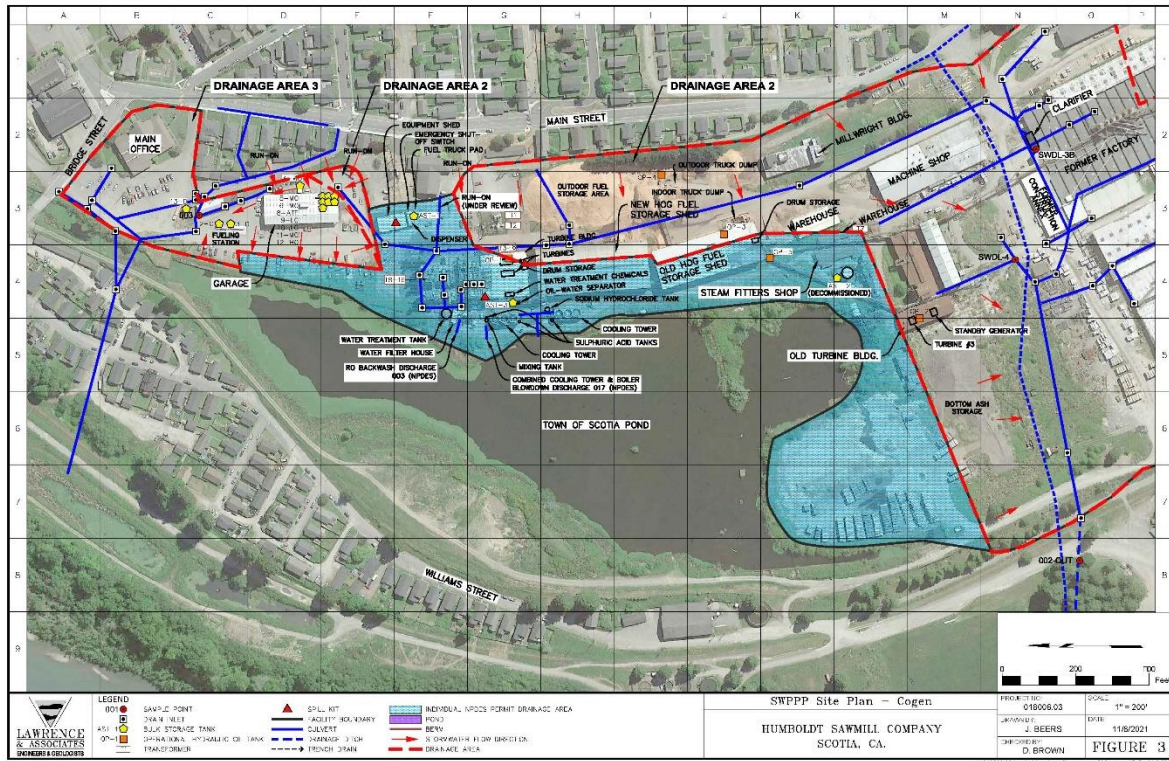
Picture 22. View of an off-site discharge point where the samples are collected (002). The facility's runoff that are captured by storm drain inlets within the Drainage Area 2 drains to Eel River via this outfall. Picture taken by Farzad Kasmaei.

Site Maps:

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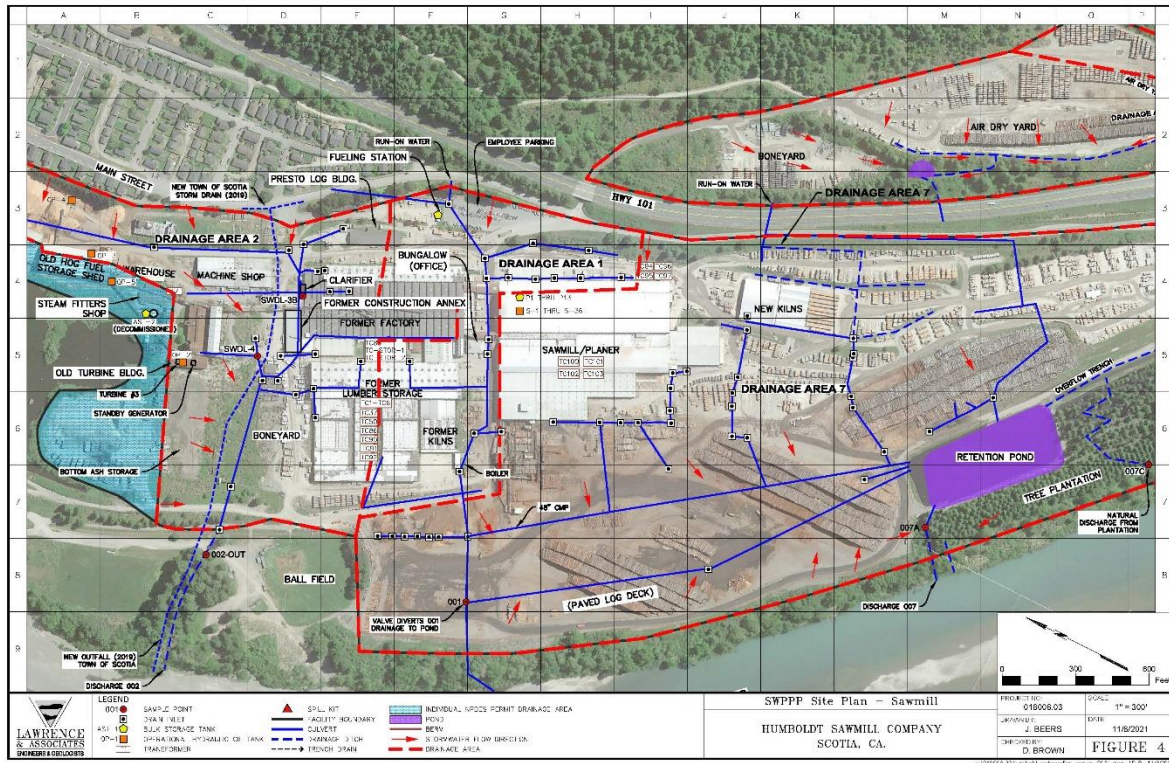


Site Map 1: This site map has been prepared by the Discharger and uploaded to SMARTS. The site map indicates the water flow directions, location of the Log Pond, Cogen area, and drainage areas 2 and 3 within the north side of the facility.

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Site Map 2: This site map has been prepared by the Discharger and uploaded to SMARTS. The site map indicates the water flow directions, discharge points, drainage areas, and the location of the main retention pond, paved log deck, upper yard and drainage areas 1, 2 and 7 within the south side of the facility.