



Longview Lumber • PO BOX 518 • Longview, WA 98632

2901 Industrial Way
Weyerhaeuser Lumber Storeroom
Longview, WA 98632

July 10, 2024

Ms. Kelsey Brotherton, PE
Environmental Engineer
Washington State Department of Ecology
Waste 2 Resources, Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600

Subject: Weyerhaeuser NR Company – Longview Lumber
NPDES Permit No. WA0991014
Written Report for Outfall 008B Missed Sampling Event for June 2024

Ms. Holbrook:

This letter is to provide written follow-up information specified in permit condition S3.F(e) for a missed monthly sampling event at Weyerhaeuser's Outfall 008B. We have conducted an investigation to determine the root cause of this failure, resulting in the findings below.

Description of Incident

On the morning of June 4, 2024, the inspectors from Weyerhaeuser's Truck Shop conducted their weekly inspection of Outfall 008B. They found that there was flow present at the Outfall and so collected a pH reading as required by permit WA0991014. When they attempted to collect a sample of this water they found that they did not have any sample coolers available and so did not collect a sample with the intention of collecting one at a later date in the month. The Transportation Supervisor, who would normally oversee this work, was on vacation on this day and so nobody was notified of this missed sample. All further inspections conducted in the month of June found no flow at the outfall and so no sample was taken during the month of June.

Causes of Missed Sampling Event

The root cause of the missed sampling event was a communication failure at the site accompanied by a change made to the system used to ensure the site always has sample containers available for collecting samples. The site uses Specialty Analytics out of Portland to analyze its samples. A system had been developed where each week samples would be picked up by Specialty Analytics and empty coolers would be dropped off. Coolers were dropped off based on their sampling frequency (so monthly samples would be dropped off once per month). In late 2023, due to months where no sampling had been required, the truck shop had accumulated a significant amount of sample coolers for collecting samples from Outfall 008B. Specialty Analytics was then asked to stop delivering new coolers until they had been advised the empty coolers had been used. The last of these coolers was used to collect a sample on May 21, 2024, but Specialty Analytics was not notified, meaning that when the next sample needed to be collected on June 4, there was no cooler available.

In addition to the change identified above, nobody at the site was notified of the inability to collect the sample. Resources were available at the site to provide the inspectors with the required sample bottles had this communication occurred.

Steps to Reduce, Eliminate, and Prevent Recurrence

The historical system used to provide empty sample containers to the site has been restored. The inspectors, their supervisor, and the senior manager at the truck shop have been instructed that in the event empty sample containers once again begin to

accumulate, the additional containers are to be returned to the lab empty rather than stopping delivery of new empty sample containers.

In addition, the individuals who are responsible for conducting the inspections and sampling have been provided with a list of individuals to contact in the event a sample is missed for any reason in the future. These include their immediate supervisor, the senior manager at the truck shop and the site's environmental manager. This allows for resources to be directed where they are needed while also providing several layers of protection to account for vacations.

If you have any questions regarding this matter, please contact me at 360-355-3707, or our Facility Environmental Manager, Carter Marr at Carter.marr@weyerhaeuser.com or 780-851-3378.

In accordance with Permit Condition G1.4, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

DocuSigned by:

16E89DEA87A5436...
Erik Wilson

Washinton Transportation Manager