



**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

January 23, 2025

Carter Marr
Weyerhaeuser NR Company
P.O. Box 931
2901 Industrial Way
Longview, WA 98632

Re: September 2024 Announced Non-Sampling Water Quality Compliance Inspection Report

Dear Carter Marr:

I would like to thank Weyerhaeuser NR Company (Weyerhaeuser) staff for your assistance during the non-sampling water quality inspection on September 23, 2024. Based on my observations, Weyerhaeuser appeared to be in overall compliance with NPDES Permit No. WA0991014 the time of the inspection; however, I noted two violations and one potential violation during the inspection and associated document review.

This inspection report serves as a warning letter for the two identified violations. Weyerhaeuser must take the identified corrective actions to correct the violations and potential violation within the timeframes specified in the report. For the priority pollutant samples, contact Ecology when you receive each of the sample results to establish how to submit them. I also noted several areas of concern during the inspection and associated document review. Please refer to the enclosed inspection report for information on the violations, potential violations, and areas of concern.

If you have any questions regarding the enclosed report, please contact me at 360-280-2668 or kelsey.brotherton@ecy.wa.gov.

To request ADA accommodation for disabilities, or printed materials in a format for the visually impaired, contact Ecology at 360-280-4325 or ecyadacoordinator@ecy.wa.gov. Persons with impaired hearing may call Washington Relay Service at 711. Persons with a speech disability may call TTY at 800-833-6384.

Sincerely,

A handwritten signature in cursive script, reading "Kelsey Brotherton".

Kelsey Brotherton
Industrial Section
Solid Waste Management Program

Enclosure

cc: Christine Yanik, Weyerhaeuser

Permit Compliance Inspection Report

Solid Waste Management Program

Industrial Section

A. General Information

Facility Name and Address: Weyerhaeuser NR Company
1701, 2901, & 3539 Industrial Way
Longview, WA 98632

Permit Number: WA0991014

Permit Type: Industrial NPDES Permit (Individual)

Permit Effective Dates: August 1, 2019 to July 31, 2024 (administratively continued)

Inspection Date and Time: September 23, 2024, 10:20 AM to 2:55 PM

Discharge to: Surface water, privately-owned treatment system

Receiving Water: Consolidated Diking Improvement District No. 1 (CDID) Ditch #3, Columbia River

Type of Inspection: Announced Compliance Inspection - Without Sampling

Photographs Taken: ☒ Yes ☐ No Samples Taken: ☐ Yes ☒ No

B. Personnel Information

Ecology Representative: Kelsey Brotherton

Facility Representatives: Carter Marr, Longview Environmental Manager
Christine Yanik, Regional Environmental Manager
Dave Soloman, Millwright
Kevin Thomas (Log Sort & Export Yard only)
Patrick Skreenock (Truck Maintenance Facility only)

Responsible Parties/Officials: Chris Woloszyn, Lumber Mill Manager
2901 Industrial Way
PO Box 931
Longview, WA 98632

Brian Hamilton, Export Operation Manager
1701 Industrial Way
PO Box 638
Longview, WA 98632

Erik Wilson, WA Trucking Manager
3539 Industrial Way
PO Box 2009
Longview, WA 98632

C. Summary

On Monday, September 23, 2024, I conducted an announced non-sampling water quality inspection at Weyerhaeuser NR Company (Weyerhaeuser) in Longview, Washington. The inspection included a walk-through of the facility and a document review. We visited portions of the log sorting and export yard,

Weyerhaeuser NR Company Inspection Report

Permit #: WA0991014

lumber mill, and truck shop during the site walk-through. Weyerhaeuser's Carter Marr, Christine Yanik, and Dave Solomon accompanied me on the inspection. Carter and Christine provided the requested records electronically following the inspection for review offsite.

I evaluated Weyerhaeuser's compliance with certain portions of National Pollutant Discharge Elimination System (NPDES) Permit No. WA0991014. I noted two violations, one potential violation, and several areas of concern in the Conclusion section of this report.

D. Facility Description and Background

Weyerhaeuser operates in Longview, Washington along the northern shore of the Columbia River, northwest of the Lewis and Clark Bridge, within a larger 700+ acre industrial complex which includes multiple operations and companies. Weyerhaeuser's Longview operation includes a log sorting and export yard, a dimensional lumber mill, and a truck maintenance facility. The log sort yard occupies approximately 150 acres on the southern part of the industrial complex. The dimensional lumber mill operates in the center of the industrial complex along Industrial Way on approximately 95 acres. Weyerhaeuser's truck maintenance facility operates on the northwestern corner of the industrial complex near Nippon Dynawave Packaging Company, LLC's (NDP's) Industrial Wastewater Treatment Plant (WWTP) and occupies approximately 15 acres.

Weyerhaeuser discharges process wastewater and commingled stormwater from a portion of their operations to NDP's Industrial WWTP for treatment, ultimately discharging to the Columbia River. Weyerhaeuser discharges to NDP's Industrial WWTP at five identified outfalls. Weyerhaeuser also discharges a portion of their process wastewater and stormwater through two stormwater outfalls. There are two additional stormwater outfalls which have infrequent discharges.

Ecology issued NPDES Permit No. WA0991014 to Weyerhaeuser for the discharge of process wastewater/commingled stormwater to NDP's Industrial WWTP and for the discharge of stormwater and treated wastewater into the Consolidated Diking Improvement District No. 1's (CDID) Ditch #3 and the Columbia River. Ecology issued the permit on July 17, 2019. The permit expired on July 31, 2024. Ecology deemed Weyerhaeuser's renewal application complete on January 23, 2024 and administratively continued NPDES Permit No. WA0991014 until Ecology issues a new permit.

Log Sort and Export Yard

Activities at the log sorting and export yard include log storage, debarking, and an export dock. Logs arrive at the facility and Weyerhaeuser unloads, scales, and sorts the logs. Weyerhaeuser also debarks a portion of the logs. Weyerhaeuser loads all the logs (barked and debarked) on ships at the export dock for shipping to China, Japan, or Korea. Weyerhaeuser receives approximately 400,000,000 board-feet of raw logs per year at the log sort yard.

Process wastewater and commingled stormwater from the stacker shop drains to the Stacker Shop Sump (Outfall 001A), located near NDP's chip piles. Outfall 001A pumps wastewater to NDP's Industrial WWTP for treatment. Processes at the facility that generate process wastewater include maintenance activities and washing at the stacker shop. Process wastewater and commingled stormwater flows through an oil-water separator and a settling basin prior to discharging to NDP's Industrial WWTP via Outfall 001A.

Stormwater from the log sort yard drains primarily to the East Pond. Most of the stormwater from the sort yard flows through open drainage and conveyance ditches. Weyerhaeuser updated the larger drainage ditches with check dams to reduce flow velocities and increase settling of suspended particles.

Historically Weyerhaeuser frequently discharged stormwater from Outfall 007B (Adjacent to Export Dock). Weyerhaeuser modified this area to allow stormwater to drain to the export dock. Stormwater from the export dock drains to a sump which pumps the stormwater to a conveyance ditch and ultimately to the East Pond. Discharges from the Export Dock Sump (Outfall 009B) occur infrequently during extreme rain events when the stormwater overwhelms the sump and stormwater sheet flows to the Columbia River.

The East Pond collects stormwater and some process wastewater from the log sort yard, the export dock, and a portion of NDP's chip storage area. The East Pond is approximately 1.9 acres and allows for settling of solids prior to discharging from Outfall 003B. The East Pond also has a continuous pH adjustment system located at the inlet of the pond. Weyerhaeuser notified Ecology in August 2022 that they had installed two surface aerators in the East Pond in April 2022.

Saw and Planer Mill (Dimensional Lumber Mill)

The dimensional lumber operation processes approximately 400,000,000 board-feet of raw logs per year. Weyerhaeuser cuts logs at the saw mill to specified dimensions following scaling, sorting, and debarking. Weyerhaeuser can dry the lumber in the dry kilns; however, they have not used the dry kilns since January 2017. Weyerhaeuser planes all lumber, and they treat some of the planed lumber with a mold inhibitor. Weyerhaeuser stores some lumber onsite prior to shipping offsite for purchase.

The Sawmill East Log Yard (Outfall 005B, referred to as the Material Recovery Facility in NPDES Permit No. WA0991014) collects stormwater runoff from a portion of the log storage area within the saw mill. Stormwater flows through an oil-water separator and flows to NDP's Industrial WWTP. Stormwater runoff from the remaining portion of the log storage area drains to the Log Yard Sump (Outfall 002B). Weyerhaeuser pumps commingled stormwater and process wastewater from Outfall 002B to NDP's Industrial WWTP. Process wastewater and commingled stormwater from the planer mill and the lumber dry kilns drains to the Planer Sump (Outfall 006B) and discharges to NDP's Industrial WWTP.

Stormwater not collected for treatment in NDP's Industrial WWTP drains to the northern drainage ditch along Industrial Way and ultimately discharges to CDID Ditch #3 via Outfall 004B. The northern drainage ditch also collects stormwater from North Pacific Paper Company LLC (NORPAC), Columbia and Cowlitz Railway LLC (CLC), and a portion of NDP's property.

Truck Maintenance Facility

The Timberlands Truck Maintenance Facility includes a truck shop, a truck wash station, and overnight parking for log trucks. Process wastewater from truck maintenance and washing activities flows over a paved parking lot to a drain, which flows by gravity to NDP's Industrial WWTP. Stormwater from the site collects in a separate drain and flows to a stormwater sump. The stormwater sump pumps stormwater approximately 200 feet. Stormwater then flows over pavement to the truck wash drain.

E. Compliance Inspection

The compliance inspection included a facility walk-through and a document review. I have included information from each portion of the inspection in the following sections.

1. Site Walk-Through

We visited the log sorting and export yard, the dimensional lumber mill, and the truck maintenance facility during the inspection. I have included a summary of my observations at each of these areas in the respective portions of this section of the report.

Log Sort and Export Yard

During the inspection at the Log Sort and Export Yard, we visited the drainage ditches near the Timberlands Operations Building (TOB), Outfall 001B, the old oil-water separator, the bark storage area, the discharge point to NDP's Chips Scale Sump, Outfall 009B and the export dock pump station, the drainage by the Longshoreman's Lunchroom, the debarker area, the East Sump, and the East Pond and Outfall 003B. I have noted observations for each location in the following subsections.

Weyerhaeuser's Kevin Thomas joined us for the inspection at the Log Sort and Export Yard.

Timberlands Operations Building (TOB)

We visited two drainage ditches near the TOB during the inspection. I have identified the two ditches we visited in Figure 1. In the ditch identified as A in Figure 1, I noted that Weyerhaeuser did not modify this ditch to a riprap-lined ditch, as they did with many of the other conveyance ditches throughout the log sort and export yard. I observed vegetation along the sides and bottom of the ditch (Photo 1 through Photo 4, Appendix A). I noted solids accumulated in portions of the ditch (Photo 2, Appendix A). This ditch receives all runoff from the eastern portion of the log sort and export yard, including the export yard, debarker discharge, and the discharges from NDP's chips area. I observed the box where portions of the East Sump and eastern drainage ditches enter the ditch identified as A in Figure 1 (Photo 1 and Photo 3, Appendix A). I observed scum and float on the surface of the water in the conveyance ditch downstream of the bar screen and the discharge of East Sump and the eastern ditches (Photo 4, Appendix A). I also noted exposed soil and erosion along the area above the outlet culvert from the ditch to the East Pond (Photo 4, Appendix A). I observed two sets of floating booms in the ditch and noted that the booms appeared to be in good condition at the time of the inspection (Photo 1 and Photo 3, Appendix A).

At the ditch identified as B in Figure 1, I noted scum and solids accumulated on the surface of the ditch upstream of the boom, between the boom and check dam, and downstream of the check dam (Photo 5 through Photo 7, Appendix A). Weyerhaeuser modified this ditch from a vegetated ditch to a riprap lined ditch. I noted minimal vegetation growing along the western side of the conveyance ditch (Photo 5 and Photo 6, Appendix A). I also observed wood chips and debris accumulated along the northeastern side of the riprap near the check dam structure (Photo 5 and Photo 7, Appendix A). I observed the water level downstream of the check dam was below the outlet level for discharging to the next conveyance ditch (Photo 7, Appendix A).

I noted odors at these ditches during the inspection, with significant odors at the ditch identified as B in Figure 1. Historically, I have not observed significant odors at the ditches. I asked Kevin how frequently Weyerhaeuser cleans out the drainage ditches. Kevin stated they clean out all the

ditches annually and clean out at least one ditch quarterly. The quarterly clean out rotates between the ditches throughout the log sort and export yard. Kevin was unsure which ditch they last cleaned out on the quarterly schedule at the time of the inspection.

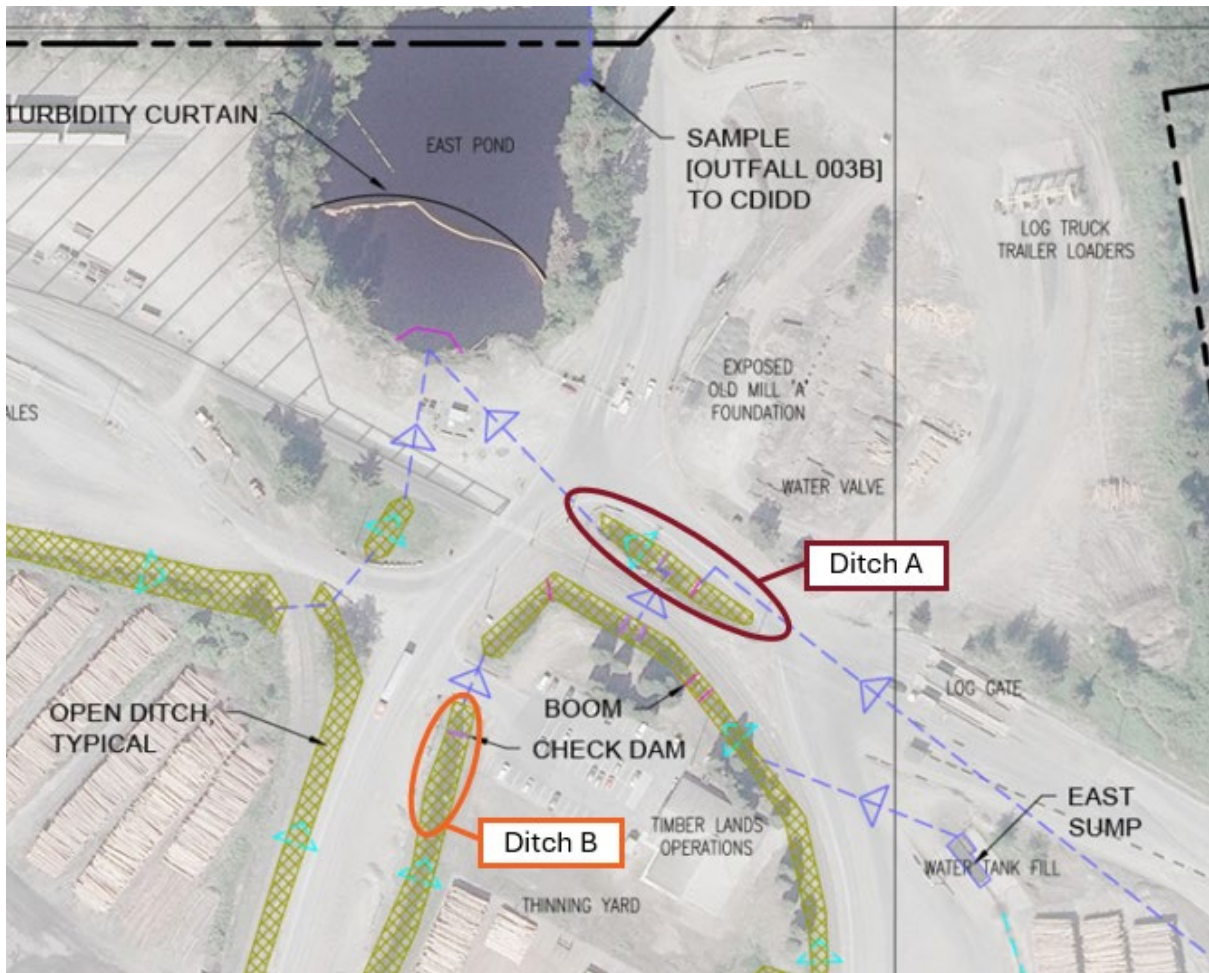


Figure 1: Map of a portion of Weyerhaeuser's stormwater system at the log sorting and export yard.

Stacker Shop Area

We visited Outfall 001B, the old oil-water separator, the bark storage area, and the discharge to NDP's Chips Scale Sump while at the Stacker Shop area. I noted wood solids and debris located in the Outfall 001B sump and scum in the basin that pumps to NDP's Industrial WWTP (Photo 8 and Photo 9, Appendix A). I asked Kevin how often Weyerhaeuser cleans out the Outfall 001B sump. Kevin reported they clean it out as needed, approximately one to two times a year.

I observed standing water in the old oil-water separator and some floating trash; however, I did not observe a discharge from the old oil-water separator (Photo 10 and Photo 11, Appendix A). I did not observe an oil sheen at the time of the inspection. I asked Weyerhaeuser if they knew where the old oil-water separator discharges to. Weyerhaeuser's historic stormwater documentation shows this discharges to NDP's Chips Sump; however, NDP has reported it does not enter their Chips Sump. Dave walked across the street during the inspection and reported he believed the old oil-water separator discharged into one of NDP's drainage ditches located on the north side of the boundary road between the properties, south of NDP's Chips Sump. This ditch ultimately flows to

NDP's Chips Scale Sump and back to Weyerhaeuser's stormwater system. I did not observe NDP's drainage ditch during the inspection.

We drove past Weyerhaeuser's bark storage area located to the south of NDP's chips area and between the old oil-water separator and the discharge to NDP's Chips Scale Sump. I also observed the bark storage area from the discharge point to NDP's Chips Scale Sump. During previous inspections at Weyerhaeuser and neighboring facilities, I've noted bark and woody debris accumulated on the roadway and on neighboring properties apparently originating from Weyerhaeuser's bark storage area. I did not observe any woody materials blowing to neighboring properties from the bark storage area on the day of the inspection. We discussed management practices Weyerhaeuser could employ for the bark storage area to reduce materials transporting offsite due to wind or stormwater runoff.

I observed woody materials, including bark and fines, accumulated in the area by the discharge to NDP's Chips Scale Sump (Photo 12 through Photo 15, Appendix A). I also observed standing water pooled at the bar screen and the jersey barriers at the discharge to NDP's Chips Scale Sump (Photo 12, Photo 14, and Photo 15, Appendix A). I did not observe water flowing through the bar screen to NDP's Chips Scale Sump at the time of the inspection (Photo 15, Appendix A); however, I did not inspect NDP's Chips Scale Sump during the inspection to see if there was flow from Weyerhaeuser entering the sump. I noted straw bales that appeared to be relatively new along the northeast and southwest sides of the existing jersey barriers and noted the straw bales appeared to be containing woody materials (Photo 12, Photo 13, and Photo 14, Appendix A).

Export Dock

We visited the drainage near the Longshoreman's Lunchroom, the Export Dock Sump, and Outfall 009B during the inspection at the Export Dock area. In the past I've observed channeling in the grassy area near the Longshoreman's Lunchroom leading to a drop-off to the Columbia River. I've also noted standing water and an elevated jersey barrier directing runoff to the channeled area. On the day of the inspection, I noted a jersey barrier placed along the edge of the paved area and the grassy area diverting runoff flows away from this area. I observed some slight channeling in the grassy area; however, I did not observe any standing water, wet areas, or evidence of recent discharges (Photo 16 and Photo 17, Appendix A). During the inspection we discussed the feasibility of modifying the area to ensure no discharge or adding this drainage as an identified outfall in the permit.

I noted runoff flowing to the Export Dock Sump from the east (Photo 18 and Photo 19, Appendix A). I noted wood fines accumulated in the path of the runoff (Photo 18 and Photo 19, Appendix A). I also observed bark and larger woody solids accumulated near the opening of the Export Dock Sump (Photo 20, Appendix A). I did not observe the pumps operating at the Export Dock Sump at the time of the inspection. I asked Weyerhaeuser how frequently they inspect and clean out the Export Dock Sump. Weyerhaeuser reported they inspect the sump weekly and clean out the sump as needed.

I observed the Outfall 009B discharge point. During significant rain events, the Export Dock Sump could become overwhelmed leading to a discharge from Outfall 009B to the Columbia River via overland flow. I noted new booms at the Outfall 009B area and did not observe any evidence of a recent discharge in the area.

Weyerhaeuser NR Company Inspection Report

Permit #: WA0991014

Debarker Area

I observed the runoff from the Debarker operation. Runoff flows overland to the East Sump. Weyerhaeuser was not operating the Debarker during the inspection. I noted significant solids accumulated on the ground in the area of the surface runoff that appeared to be primarily wood fines with some bark and wood chips (Photo 21, Appendix A). I asked Weyerhaeuser how frequently they wash the Debarker and discharge to the East Sump. Weyerhaeuser reported they wash the Debarker every time it's used. I also asked Weyerhaeuser how frequently they clean the accumulated solids from the ground in the area of the runoff. Weyerhaeuser reported they clean solids as needed.

Weyerhaeuser stores their pH buffer solutions at the Debarker Lunchroom. I inspected the 7.0 and 10.0 standard unit (SU) buffer solutions during the inspection and noted both had expiration dates of August 16 and August 18, 2024, respectively (Photo 22 and Photo 23, Appendix A). Weyerhaeuser only had a small bottle of 4.0 SU buffer solution at the Debarker Lunchroom without an expiration date. Kevin stated that operators transfer buffer solution from the larger bottles into the small bottles for calibrations before use. Kevin thought that operators had used all the 4.0 SU buffer solution from the large bottle and only had the small bottle left.

East Sump

We visited the East Sump during the inspection. Various overland flows discharge to the East Sump from the eastern portion of Weyerhaeuser's log sort yard, including the Debarker area. I observed flow entering the East Sump at the time of the inspection (Photo 24, Appendix A). I noted solids accumulated near the inlet to the East Sump. The East Sump discharges to a conveyance ditch located north of the TOB before flowing to the conveyance ditch identified as Ditch A in Figure 1 and ultimately entering the East Pond.

East Pond

We visited the East Pond inlet, shack, sodium hydroxide tank, and Outfall 003B during the inspection. Weyerhaeuser completed dredging of the East Pond in February through April 2024. I observed two pumps operating on the inlet side of the turbidity curtain and one pump in the distance on the downstream side of the turbidity curtain (Photo 25, Appendix A). The water at the inlet appeared generally clear and I did not note any areas with apparent solids accumulation. I observed the level of the sodium hydroxide tank was approximately 800 gallons on the date of the inspection (Photo 26, Appendix A).

I observed the discharge from Outfall 003B and the north side of the East Pond near Outfall 003B (Photo 27 and Photo 28, Appendix A). I noted vegetation growing along the edge of the pond near Outfall 003B and floating material on the surface of the water; however, the boom appeared to be containing the floating solids and preventing them from discharging at Outfall 003B. I also observed one of the pumps in the pond operating (Photo 27, Appendix A). I observed a discharge from three of the four weirs, with a slight trickle of water flowing over the North weir. The discharge appeared relatively clear with no floating solids, and I noted some foam on the surface of the water discharging into the pipe to CDID Ditch #3. I did not observe an oil sheen in the discharge and did not note any abnormal or significant odors from the discharge on the day of the inspection (Photo 28, Appendix A).

Weyerhaeuser NR Company Inspection Report

Permit #: WA0991014

Lumber Mill

During the inspection at the Lumber Mill, we visited Outfall 005B, Outfall 002B, the Sawmill Shack, the Pipe A drainage areas, Outfall 006B, the Pipe N catch basins near Columbia & Cowlitz Railway's (CLC's) locomotive shop, and the northern drainage ditch and Outfall 004B. I have noted observations for each location in the following subsections.

Sawmill Log Yard & Sawmill Shack

We visited the sawmill log yard area during the inspection. I observed Outfall 005B (Pump Station 7), Outfall 002B (Pump Station 6), and Weyerhaeuser's pH buffer solutions used for calibrating the lumber mill pH meter.

Weyerhaeuser re-routed their discharge from Outfall 002B to now pump to Pump Station 7 (Outfall 005B). Outfall 005B continues to discharge to NDP's Industrial WWTP. Because Ecology has not modified NPDES Permit No. WA0991014, Weyerhaeuser continues to monitor Outfall 002B as required by Special Condition S2.A. I observed the pipe from Outfall 002B entering Pump Station 7 during the inspection (Photo 29, Appendix A). I did not observe the pumps operating at Outfall 005B during the inspection, indicating Weyerhaeuser was not discharging to NDP at that time. I noted some slight solids accumulation in the sump of the pump station. I asked Weyerhaeuser how often they clean solids out the sump. Dave reported they historically removed solids annually, but they were transitioning to quarterly sump cleanouts. I asked Dave when Weyerhaeuser last removed solids from Pump Station 7. Dave reported they removed solids approximately 3 months ago.

During the inspection, Carter reported that Weyerhaeuser had recently cleaned out Pipe A with a water jet, approximately 2 weeks prior to the inspection. Following the clean out, Weyerhaeuser discovered that Pipe A was leaking into Pump Station 6 at the sump wall where Pipe A enters the Pump Station 6 sump. Pipe A travels through Pump Station 6 and ultimately discharges into the Northern Drainage Ditch. I observed Pipe A and the ongoing leak at Pump Station 6 during the inspection. I noted the water flowing into the sump from the leak appeared to be generally clear. I also noted the water in the sump was generally clear with minimal solids floating on the surface (Photo 30, Appendix A). During the inspection, Carter reported that Weyerhaeuser attempted to patch the leak the week prior; however, the patch did not appear to fully correct the leak. Carter stated they would likely need to replace the leaking portion of the pipe to resolve the leak into Pump Station 6.

Weyerhaeuser stores the pH buffer solutions used to calibrate the lumber mill pH meter at the Sawmill Shack. I observed the pH buffer solutions during the inspection and noted all were within their expiration dates. I recorded expiration dates of December 2025 for the 4.0 SU buffer solution, March 2026 for the 7.0 SU buffer solution, and August 2025 for the 10.0 SU buffer solution.

Pipe A Drainage Areas

I observed two manhole catch basins and a drainage ditch within the Pipe A drainage area during the inspection. Weyerhaeuser installed a filter housing structure in one of the manhole catch basins. I observed the filter structure during the inspection. I noted a bag floating on the water near the filter structure. Weyerhaeuser reported that they installed biochar-filled bags to provide additional treatment. The filter structure includes oyster shells as filtration media. I asked

Weyerhaeuser NR Company Inspection Report

Permit #: WA0991014

Weyerhaeuser how often they change out or clean the filtration and treatment medias. Dave reported he cleans the oyster shells and replaces the biochar bags as needed. Dave also reported he last changed out the biochar bags and cleaned the oyster shells approximately 2 weeks ago. I noted a sheen on the surface of the water before the filtration and treatment media in one of the manhole catch basins (Photo 31, Appendix A). I could not see the water exiting the manhole.

We visited another manhole catch basin located south of the manhole with the filtration structure. Weyerhaeuser did not install a filtration structure in this manhole; however, they have inserted biochar bags in this manhole as well. I observed a metallic-appearing sheen on the surface of the water in this manhole and observed the water in the manhole was a slightly opaque brown-orange color (Photo 32 and Photo 33, Appendix A).

We walked to a nearby drainage ditch that receives runoff from a portion of Weyerhaeuser's lumber mill operations and from the neighboring NORPAC drainage ditches. I observed Weyerhaeuser had placed rock in an area near the ditch where surface runoff flows into the ditch from a paved area on Weyerhaeuser's property (Photo 34 and Photo 36, Appendix A). During previous inspections I've noted erosion in this area due to the surface runoff. I did not observe any evidence of erosion in this area during the inspection. I observed the screen Weyerhaeuser installed on the exiting culvert of the ditch and did not observe significant trash or solids accumulated on the face of the screen (Photo 35, Appendix A). I observed vegetation in the drainage ditch and did not note any water in the drainage during the inspection (Photo 36 and Photo 37, Appendix A). I noted some trash accumulated near the drainage ditch and the railroad tracks leading to NORPAC's ONP Warehouse (Photo 37, Appendix A); however, there appeared to be less trash and debris in the area compared to previous inspections.

Outfall 006B

We visited Outfall 006B (Pump Station 1) during the inspection. I noted the pumps were not operating at the time of the inspection, indicating Weyerhaeuser was not discharging to NDP at the time. I asked Weyerhaeuser how often they clean out the sump. Dave reported they historically cleaned out Pump Station 1 annually but were transitioning to a quarterly clean-out schedule. Dave also reported they last cleaned out the sump approximately two months ago. I did not observe the sump during the inspection.

Pipe N Drainage Basins near CLC's Locomotive Shop

We visited a catch basin in Weyerhaeuser's lumber storage area and two catch basins located near Columbia & Cowlitz Railway's (CLC's) Locomotive Shop that appear to be part of Weyerhaeuser's Pipe N drainage system. At the catch basin located in Weyerhaeuser's lumber storage area, we observed a pipe entering the catch basin from the south that appeared to come from CLC's facility. We walked to CLC's area and Dave identified a large, grated cover on top of a catch basin that Dave reported flowed to Weyerhaeuser's catch basin (Photo 38, Appendix A). I could not observe the piping within the catch basin due to a large metal staircase located on top of the grated cover. We walked approximately 50 feet east and I identified a catch basin that also had a pipe entering from Weyerhaeuser's property (Photo 39, Appendix A). Dave removed the cover of the catch basin, and we observed two pipes entering the sump and a mesh screen on the bottom of the sump. We did not observe any pipes exiting the sump; however, the mesh screen in the bottom of the sump

appeared to have a discolored area in the center of it, potentially indicating stormwater drains through the bottom of the sump. I asked Weyerhaeuser if they were aware of a catch basin on their property draining to this sump. Weyerhaeuser was not aware of a catch basin flowing to this sump. I also asked Weyerhaeuser if they knew where the water from this sump drained to and Weyerhaeuser was unsure.

Northern Drainage Ditch & Outfall 004B

We visited Outfall 004B during the inspection. I noted flow over the v-notch weir and exiting through the culvert at the time of the inspection (Photo 40, Appendix A). I noted the water flowing over the v-notch weir appeared to be relatively clear without notable solids. I did not observe a sheen on the surface of the water. I observed the water entering the Outfall 004B sump from the east and west sides of the Northern Drainage Ditch. I noted the water coming from the western side of the ditch appeared to be relatively clear and had a slightly blue-green color (Photo 41, Appendix A). I did not observe notable solids in the water at the time of the inspection. I noted the water coming from the eastern side of the ditch appeared to be more opaque and a brown-orange color (Photo 42, Appendix A). I also noted some algae growth on the surface of the water.

Truck Maintenance Facility

During the inspection at the Truck Maintenance Facility, we visited Outfall 008B and inspected the pH buffer solutions. I noted the expired 7.0 SU and 10.0 SU buffer solutions at the time of the inspection, with expiration dates of February 2024 and October 2023, respectively. I recorded an expiration date of July 2025 for the 4.0 SU buffer solution.

We observed the Outfall 008B discharge to NDP's Industrial WWTP. I did not observe any flow exiting Outfall 008B at the time of the inspection. I observed water ponded near Outfall 008B and noted that Weyerhaeuser installed several straw bales near the discharge pipe (Photo 43, Appendix A). I noted some solids accumulated in the area. Weyerhaeuser was not washing any vehicles at the time of the inspection. I asked Weyerhaeuser how often they removed solids from the area. Weyerhaeuser's Patrick Skreenock reported they remove solids approximately annually, with the last solids removal occurring a couple months ago.

2. Document Review

I requested the following records during the inspection for review offsite:

- Stormwater Pollution Prevention Plan (SWPPP), most recent version
- Operations & Maintenance (O&M) Manual, most recent version
- Calibration records for field meters (pH, dissolved oxygen, and flow) for 2022 to 2024 (to date)
- Weekly stormwater inspections for April 2023 to September 2024 (to date)

Weyerhaeuser's Carter Marr and Christine Yanik provided the requested records electronically on October 9, 2024. The following subsections describe my review of the provided documents.

SWPPP (most recent version)

Carter provided the most recent version of the SWPPP. I noted a revision date of September 2024, with a certification date of September 20, 2024. I noted the following comments while reviewing the revised SWPPP:

- In Section 3.2 of the September 2024 SWPPP, Weyerhaeuser identifies the stormwater conveyance ditches in the Outfall 003B drainage basin as vegetated ditches; however, Weyerhaeuser modified many of these ditches to now be rock-lined ditches instead of vegetated ditches.
- The Preventive Maintenance for Source Control and Treatment BMPs table in Section 3.2 identifies schedules for various maintenance activities related to many of the BMPs in the Outfall 003B and Outfall 004B drainage basins. I noted that many of the identified schedules vary from the maintenance schedules reported during the inspection.
 - For the “East Sump and conveyance ditch Sediment Removal” activity, Weyerhaeuser identifies a schedule of dredging twice per year or more frequently if needed. During the inspection, Kevin identified they clean out the ditches annually, with one ditch on a quarterly rotation each year.
 - The “Inspection and Cleaning of Storm Drainage Ditch System” activity reportedly for the Outfall 003B and Outfall 004B drainage basins identifies annual cleaning in the ditches. It’s unclear what ditches from the Outfall 003B drainage basin Weyerhaeuser includes in this activity versus the “East Sump and conveyance ditch Sediment Removal” activity identified in the previous bullet.
 - The East Pond sediment removal activity identifies a frequency of dredging as needed, approximately every 5 years. Weyerhaeuser completed dredging of the pond in February to April 2024. Following that dredging activity, Weyerhaeuser reported they intended to dredge the East Pond on an annual basis to reduce the duration and impact on discharge quality from Outfall 003B during future dredging activities.
- Attachment A includes the weekly inspection report form. I noted that Weyerhaeuser has updated their inspection forms.

O&M Manual (most recent version)

Carter provided the most recent version of the O&M Manual. The cover letter attached to the O&M Manual identified a revision date of September 20, 2024; however, the footer of the O&M Manual identifies a revision date of January 29, 2024. I noted the following comments while reviewing the O&M Manual:

- The cover letter attached to the O&M Manual identifies that Weyerhaeuser submitted the September 2024 O&M Manual update to Ecology via the WQWebPortal. Weyerhaeuser did not submit this revised O&M Manual through the WQWebPortal. I noted a January 31, 2024 O&M Manual update as the most recent version of the O&M Manual submitted in the WQWebPortal. Special Condition S4.A.a.3. requires Weyerhaeuser to submit substantial changes or updates to the O&M Manual to Ecology for review and approval.

- It's noted that I did not identify any substantial changes between the January 2024 and September 2024 versions of the O&M Manual requiring review and approval under Special Condition S4.A.a.3.
- The "Preventive Maintenance for Source Control and Treatment BMPs" table identifies various activities and the associated schedule for completion of the activities. This table appears to be similar to the table included in the SWPPP and discussed previously; however, I noted many of the schedules differ from the schedules identified in the table in the SWPPP. I also noted that the table in the O&M Manual appears to include additional BMPs in place at the site not included in the SWPPP table.

Calibration Records (2022-2024)

Carter provided the calibration records for the log sort yard (Outfalls 001B and 003B) and the lumber mill (Outfalls 002B, 004B, 005B, and 006B). Weyerhaeuser did not provide any calibration records for the Truck Maintenance Facility (Outfall 008B). Weyerhaeuser also did not provide any flow meter calibration records for Outfall 003B and Outfall 004B.

Weyerhaeuser's calibration records include their field measurements for pH and dissolved oxygen (DO) for each outfall. I noted various comments related to the provided calibration and field measurement records. I have separated my comments into sections based on the location of the outfall (Log Sort Yard or Lumber Mill).

Log Sort Yard (Outfalls 001B and 003B)

I noted the following comments while reviewing the provided calibration records and field measurement records for the Log Sort Yard:

- Weyerhaeuser did not provide calibration records for August through October 2022.
- November 2022 Records:
 - Weyerhaeuser did not provide calibration records for this month for Outfall 003B.
 - For Outfall 003B, the pH value reported in the discharge monitoring report (DMR) for November 9, 2022 is 6.24 standard units (SU). It appears the pH value written on the records provided for this date is 6.25 SU.
- December 2022 Records:
 - The DMR shows a pH value of 6.03 SU for December 1, 2022 at Outfall 003B. The records provided appear to show a pH value of 6.39 SU on this date.
 - Weyerhaeuser did not include the DO result from December 6, 2022 in the DMR for Outfall 003B. The records provided show a DO concentration of 5.00 mg/L on this date.
 - The records provided do not include DO calibration records for the December 6, 2022 sample.
 - The DMR shows a pH value of 6.19 SU for December 13, 2022 for Outfall 003B. It appears that the pH value written in the records for this date is 6.14 SU.

Weyerhaeuser NR Company Inspection Report

Permit #: WA0991014

- April 2023 Records:
 - The DMR includes a DO result for Outfall 003B for April 11, 2023; however, the records provided show this DO result for the following day (April 12, 2023).
 - The DMR shows a pH result of 7.13 SU at Outfall 003B on April 14, 2023. The records provided show a pH result of 7.03 SU on this date.
- Based on the pH values included in the provided records, it appears that Weyerhaeuser rounded numerous pH values incorrectly in the September through December 2023 monthly DMRs for Outfalls 001B and 003B.
- April 2024 Records:
 - The DMR shows a pH result of 7.02 SU at Outfall 001B on April 29, 2024. The records provided don't show any sample collected and analyzed on this date.
 - Without this sample, Weyerhaeuser would not have collected a pH sample during the week of April 28 to May 4, 2024 for Outfall 001B.

Lumber Mill (Outfalls 002B, 004B, 005B, & 006B)

I noted the following comments while reviewing the provided calibration and field measurement records for the Lumber Mill:

- Weyerhaeuser did not include the September 27, 2022 DO result for Outfall 004B in the DMR. The spreadsheet provided identifies a DO result of 5.5 mg/L on this date.
- Weyerhaeuser did not include the pH result for Outfall 006B for February 28, 2023 in the DMR. The spreadsheet shows a pH result of 5.86 SU on this date.
- Weyerhaeuser reported a pH value of 6.09 SU on March 14, 2023 for Outfall 004B in the DMR. The spreadsheet provided shows a pH result of 6.02 SU on this date.
- Based on the pH values included in the provided records, it appears that Weyerhaeuser rounded some pH values incorrectly for Outfall 004B in the September 2023 DMR.
- The provided spreadsheet shows no flow during the week of October 8-14, 2023 for Outfall 006B; however, the DMR does not identify no flow during this week. This is generating a false monitoring frequency violation.

Weekly Stormwater Inspections (April 2023 – September 2024)

Carter provided weekly stormwater inspection records for January 2023 through September 2024. I have separated my comments into separate sections based on the area of the inspection (Lumber Mill and Log Sort Yard)

Log Sort Yard (Outfalls 003B, 007B, & 009B)

I noted the following comments while reviewing the stormwater inspection records for the Log Sort Yard:

- For numerous inspection records, the inspector signed and certified the inspection on a different date than they reportedly completed the inspection.

Weyerhaeuser NR Company Inspection Report

Permit #: WA0991014

- The inspector signed and certified the following inspections one to six days after the reported date of the inspection: January 3, 2023, August 1, 2023, August 8, 2023, December 21, 2023, July 9, 2024, and September 24, 2024 inspections.
 - The inspector signed and certified one inspection before they reportedly completed the inspection. The inspector signed and certified the 11/7/2023 inspection on 11/6/2023.
- The responsible official signed and certified the April 4, 2023 inspection on April 3, 2024.
- The inspector did not include a date with their certification and signature for the February 28 and August 15, 2023 inspections.
- It appears the inspector mislabeled the date of the inspection for the week of July 23-29, 2023. I noted an inspection record with a date of August 25, 2023; however, Weyerhaeuser reportedly completed another inspection during that same week. Additionally, the responsible official signed and certified the inspection on July 31, 2023. Finally, the location of this inspection record is between the July 18 and August 1, 2023 inspections.
- Weyerhaeuser did not provide any inspection records for the first 12 weeks of 2024 (January through mid-March 2024) and three additional weeks in 2024 (July 28 – August 3, 2024, August 4-10, 2024, and September 1-7, 2024).
- The May 14, 2024 inspection identifies a discharge at Outfall 003B; however, the records do not include a description of the discharge from Outfall 003B as required by Special Condition S.13C.2.b.
- Weyerhaeuser states in the September 24, 2024 inspection that the ditches don't need cleaning; however, as noted previously in this report, I identified solids accumulation and notable odors at the conveyance ditches near the TOB parking lot.

Lumber Mill (Outfall 004B)

I noted the following comments while reviewing the inspection records for the Lumber Mill:

- Weyerhaeuser did not provide inspection records for 7 weeks: April 23-29, 2023, July 16-22, 2023, July 23-29, 2023, December 24-30, 2023, September 1-7, 2024, September 8-14, 2024, and September 15-21, 2024.
 - The December 2023 inspection records state, "Longview Lumber was shutdown the last week of December. No manufacturing or production." However, Weyerhaeuser reportedly collected a sample on December 28, 2023 at Outfall 004B according to the December 2023 DMR.
- The April 17, 2023 inspection states that Christine Yanik completed the inspection; however, Dave Solomon reportedly signed and certified the inspection as the inspector.
- I noted that many of the inspection records provided have a delay between the reported date of the inspection and the signature and certification of the record by the inspector. In some cases, the delay between the inspection and the certification of the record by the inspector is over three months.

- It appears that Weyerhaeuser is using another form to fill out the electronic inspection records provided based on the reported inspection time for some records, the specified duration of the inspections (less than 15 minutes for many records), and the certification/signature dates for the inspector on many of the records. Weyerhaeuser must maintain all inspection records used to document and complete inspections required by Special Condition S13.C. in accordance with Special Condition S3.C.

3. Opening & Closing Meeting Discussions

During the opening and closing meetings, we discussed various topics including ongoing compliance issues. Weyerhaeuser identified that they failed to collect priority pollutant samples at Outfalls 001B, 002B, 005B, 006B, and 008B as required by Special Condition S2.A. Weyerhaeuser previously notified me of this failed sampling requirement during a phone call. Special Condition S3.A.3.c. required Weyerhaeuser to submit these results by August 1, 2023.

During the inspection, Carter notified me that they had collected the required samples at four of the five outfalls as of the inspection date and were waiting for the results from the contract laboratory. Carter also reported he was waiting to collect the required samples at Outfall 008B until they had adequate flow to collect all required samples. During the inspection, I asked Carter to notify me when they receive the contract laboratory reports for the samples collected at Outfalls 001B, 002B, 005B, and 006B. I also asked Weyerhaeuser to notify me once they successfully collected the required samples at Outfall 008B. Weyerhaeuser has not notified me of the receipt of the contract laboratory reports or the successful sampling at Outfall 008B as of the date of this report.

F. Conclusion

Based on my observations Weyerhaeuser appeared to be in overall compliance with the portions of NPDES Permit No. WA0991014 I evaluated at the time of the inspection; however, I noted two violations, one potential violation, and several areas of concern during my inspection and associated offsite document review, as detailed in the following sections.

1. Violations

I noted the following violations during the inspection and offsite document review. Weyerhaeuser must take corrective action based on these violations, as appropriate. This inspection report serves as a warning letter for the identified violations. Ecology may pursue additional enforcement action on the below violations:

1. Weyerhaeuser did not sample for priority pollutants at Outfalls 001B, 002B, 005B, 006B, and 008B as required by Special Condition S2.A.
 - a. **Corrective Action #1:** If Weyerhaeuser has not already done so, Weyerhaeuser must collect the required priority pollutant samples at these locations as soon as possible, but **no later than 45 days after receipt of this report.**
 - i. Following completion of the required priority pollutant sampling, Weyerhaeuser must submit the results to Ecology **within 30 days of receiving the results from the contract laboratory.**

- b. **Corrective Action #2: Within 15 days of receipt of this report**, if Weyerhaeuser has already collected the required samples at any of the identified outfalls, Weyerhaeuser must notify Ecology of the sample dates for each outfall. Weyerhaeuser must notify Ecology via email.
 - i. If Weyerhaeuser has already received the contract laboratory reports for any of these sampling events, Weyerhaeuser must attach the results with the notification email.
- c. **Corrective Action #3:** If Weyerhaeuser has already collected the required priority pollutant samples and received the contract laboratory results, Weyerhaeuser must submit the results of the priority pollutant sampling as directed by Ecology in accordance with Special Condition S3.A. **Weyerhaeuser must work with Ecology to submit the priority pollutant results within 45 days of receipt of this report.**
 - i. If Weyerhaeuser has not received any of the contract laboratory reports to date, Weyerhaeuser must work with Ecology to submit the results **within 30 days of receipt of the contract laboratory report.**

2. Potential Violations

I noted the following potential violation during my inspection and offsite document review. Weyerhaeuser must take corrective action based on this potential violation. Ecology may pursue enforcement action on the below potential violation if future inspections or information obtained by Ecology indicate that Weyerhaeuser has not addressed this potential violation:

- 1. Weyerhaeuser reported a pH of 7.02 SU for Outfall 001B on April 29, 2024 in the April 2024 DMR; however, the records provided do not indicate that Weyerhaeuser collected and analyzed a sample at Outfall 001B on this date. Without this sample, Weyerhaeuser would not have met the weekly pH monitoring requirement in Special Condition S2.A. for the week of April 28 to May 2, 2024 for Outfall 001B.
 - a. **Corrective Action #1:** Weyerhaeuser must review their records and determine if they collected and analyzed a sample for pH at Outfall 001B during the week of April 28 to May 4, 2024.
 - b. **Corrective Action #2: Within 30 days of receipt of this report –**
 - i. In accordance with General Condition G10, if Weyerhaeuser did collect and analyze a sample for pH during this week, Weyerhaeuser must submit the record of measurement to Ecology via email; or.
 - ii. If Weyerhaeuser did not collect and analyze a sample for pH at Outfall 001B during this week, Weyerhaeuser must revise the April 2024 DMR to remove the reported pH result for April 29, 2024 and submit a written report in accordance with Special Condition S3.F.

3. Areas of Concern

I noted the following areas of concern during the inspection and offsite document review. Weyerhaeuser should review these areas of concern and adjust operations, if necessary, to ensure proper operation and maintenance of the systems. I have separated my areas of concern into different sections.

Log Sort Yard

I noted the following areas of concern during the onsite inspection at the Log Sort Yard:

1. I observed solids accumulated in portions of the conveyance ditches inspected. I also noted scum and floating solids on the surface of the ditches and a strong odor at one of the conveyance ditches. Weyerhaeuser should consider removing solids and floating materials from the ditches more frequently to aid in solids and organics removal in the conveyance ditches.
2. I noted exposed soil and evidence of erosion along the area above the outlet culvert in one of the conveyance ditches. Weyerhaeuser should ensure the sides and bottoms of the ditches are adequately vegetated or rock-lined to prevent increased solids loading in the ditches due to erosion.
3. I observed wood chips and debris accumulated along the northeastern side of the riprap near the check dam structure in the ditch to the west of the TOB parking lot. This could indicate overflowing of the check dam structure resulting in reduced effectiveness of the check dam. Weyerhaeuser should ensure they are removing solids at an adequate frequency to provide sufficient volume for retention and settling.
4. I noted wood chips and woody debris accumulated in the Outfall 001B sump. I also noted an approximately 85.5% increase in total suspended solids (TSS) concentration at Outfall 001B reported in the DMRs between the September 3 and October 1, 2024 samples (54.5 milligrams per liter, mg/L, versus 375.0 mg/L). Weyerhaeuser should ensure they are cleaning out the Outfall 001B sump at a sufficient frequency to prevent excessive solids discharges to NDP's Industrial WWTP.
5. During previous inspections at Weyerhaeuser and neighboring facilities, I've noted bark and woody debris accumulated on the roadway and on neighboring properties apparently originating from Weyerhaeuser's bark storage area near the Old Oil-Water Separator. Special Condition S7.A. requires Weyerhaeuser to handle and dispose of solid waste materials in a manner that prevents its entry into ground water, surface water, or NDP's Industrial WWTP. Special Condition S13.B.3.b.i. requires Weyerhaeuser to implement good housekeeping best management practices (BMPs) for areas which may contribute pollutants to stormwater discharges. Weyerhaeuser should ensure they are managing the materials stored in this area adequately to prevent their release offsite.
 - a. It's noted that Weyerhaeuser's bark storage area does not contain solid wastes; however, if the wind, runoff, or other mechanisms transport these materials off the property, the materials become solid wastes.
 - b. It's also noted that I did not observe any evidence of material transport offsite in this area during the inspection.

Weyerhaeuser NR Company Inspection Report

Permit #: WA0991014

6. I observed woody materials accumulated throughout many areas of the Log Sort Yard and Export Dock, including at the discharge to NDP's Chips Scale Sump, at the Export Dock Sump area, at the Debarker area, and at the inlet to the East Sump. Weyerhaeuser should ensure they are collecting and removing these materials at an adequate frequency to prevent impacts to the runoff ultimately discharging from Outfall 003B.
7. I observed a small amount of channeling in the grassy area next to the Longshoreman's Lunchroom. Weyerhaeuser should consider either modifying the drainage in this area to prevent any discharges from the area or submitting a revised permit application that identifies this discharge location as an outfall.
8. The pH buffer solutions were all either expired or did not have an expiration date identified. Weyerhaeuser must purchase new buffer solutions and stop using the expired buffer solutions.

Lumber Mill

I noted the following areas of concern during the onsite inspection of the Lumber Mill:

1. I observed some solids accumulated in the sump of Pump Station 7 (Outfall 005B). Weyerhaeuser should ensure they are removing solids from the sump at an adequate frequency to prevent excessive solids or organic discharges to NDP's Industrial WWTP.
2. Carter identified Pipe A discharging into Pump Station 6 (Outfall 002B) during the inspection. If Weyerhaeuser has not already done so, Weyerhaeuser should ensure they repair the leak to reduce excessive hydraulic loading to NDP's Industrial WWTP.
3. I noted some trash near the drainage ditch and the railroad tracks in the Pipe A drainage area. Weyerhaeuser should ensure they are removing trash and debris within the stormwater drainage basins.
 - a. I noted significantly less trash and debris in this area compared to previous inspections.
4. It's unclear where some of the catch basins drain to in the portion of the Pipe N drainage basin near CLC's Locomotive Shop. Weyerhaeuser should consider evaluating the catch basins and piping networks in this area to determine how stormwater travels in this area. Weyerhaeuser should also consider working with CLC and NDP to complete this work.

Truck Maintenance Facility

I noted the following areas of concern during the onsite inspection at the Truck Maintenance Facility:

1. Weyerhaeuser had two expired pH buffer solutions at the time of the inspection. Weyerhaeuser must replace the expired 7.0 and 10.0 SU buffer solutions at the Truck Maintenance Facility.
2. I observed some solids accumulated near Outfall 008B. Weyerhaeuser should consider reviewing their frequency of solids removal in this area to ensure they are adequately controlling solids discharges to NDP's Industrial WWTP.

SWPPP & O&M Manual

I noted the following areas of concern while reviewing the provided SWPPP and O&M Manual:

1. In Section 3.2 of the September 2024 SWPPP, Weyerhaeuser identifies conveyance ditches as vegetated ditches in the Outfall 003B drainage basin. Weyerhaeuser modified many of these

ditches to no longer be vegetated, but rather are rip-rap-lined ditches. Weyerhaeuser should update the SWPPP to reflect this BMP change.

2. The table titled "Preventive Maintenance for Source Control and Treatment BMPs" included in both the SWPPP and the O&M Manual appear to be inconsistent with each other. The information included in the tables is also inconsistent with information provided during the inspection. It's noted that the table included in the O&M Manual appears to be more up to date than the table included in the SWPPP. Weyerhaeuser should update these tables to reflect current maintenance practices at the site.
3. Attachment A of the SWPPP includes a weekly inspection report form for stormwater inspections; however, it appears that Weyerhaeuser is using different forms for their weekly stormwater inspections at both the Log Sort Yard and the Lumber Mill. Weyerhaeuser should update the SWPPP to either include the most recent version of the inspection logs or to remove the inspection forms.
4. Weyerhaeuser included a cover letter attached to the provided O&M Manual. The cover letter identifies that Weyerhaeuser submitted the September 2024 O&M Manual update to Ecology via the WQWebPortal. Weyerhaeuser did not submit this revised O&M Manual through the WQWebPortal. It's noted that the changes Weyerhaeuser made to the O&M Manual compared to the January 2024 O&M Manual don't appear to require submission to Ecology under Special Condition S4.A.a.3.; however, Weyerhaeuser should ensure their documentation is consistent and accurate.

Calibration Records and DMRs

I noted the following areas of concern while reviewing the provided calibration records (including Weyerhaeuser's field measurement records), and while comparing the records to the submitted DMRs:

1. Weyerhaeuser did not provide many of the requested calibration records, including various calibration records for pH meters, DO meters, and flow meters. Weyerhaeuser should confirm they have these records, as required by Special Conditions S2.C.8. and S3.C.
2. I noted inconsistencies between many of the values recorded on the field measurement and calibration records compared to the respective monthly DMRs. Weyerhaeuser must ensure they are correctly reporting results in the DMRs.
3. Weyerhaeuser incorrectly rounded various pH results reported in the September through December 2023 DMRs for Outfalls 001B, 003B, and 004B. If Weyerhaeuser chooses to report pH values to less significant figures than what they record on their field measurement records, Weyerhaeuser must ensure they are properly rounding results for reporting in the DMRs.
4. The records provided show that Weyerhaeuser did not observe any flow from Outfall 006B during the week of October 8-14, 2023; however, the October 2023 DMR does not identify no flow during this week. Weyerhaeuser should ensure they are accurately reporting when they do not discharge from specific outfalls in the DMR to prevent inaccurate violations.

Stormwater Inspections

I noted the following areas of concern while reviewing the provided stormwater inspection records:

Weyerhaeuser NR Company Inspection Report

Permit #: WA0991014

1. Weyerhaeuser did not provide weekly inspection records for numerous weeks, including 15 weeks for the Log Sort Yard (Outfalls 003B, 007B, and 009B) and seven weeks for the Lumber Mill (Outfall 004B). Weyerhaeuser must ensure they have these inspection records and are maintaining them as required by Special Conditions S13.C. and S3.C.
2. For many of the inspection records I reviewed, I noted that the inspector does not sign and certify the inspection record on the date of the inspection. In some cases, the inspector didn't sign and certify the inspection record for up to 3 months after reportedly completing the inspection. Weyerhaeuser should ensure the inspector signs and certifies the inspection on the day they complete the inspection.
 - a. I noted that Weyerhaeuser may be using another form to record observations during inspections before entering the information into an electronic form for the Lumber Mill. If Weyerhaeuser is using another form, Weyerhaeuser must maintain these inspection records in accordance with Special Condition S3.C.
3. I noted that the inspector signed and certified an inspection at the Log Sort Yard the day before reportedly completing the inspection. On a separate inspection record, I also noted that the responsible official signed and certified an inspection at the Log Sort Yard before the inspector reportedly completed the inspection. Weyerhaeuser must ensure they are accurately completing their inspection forms. Weyerhaeuser should also review their inspection procedures to confirm inspectors and responsible officials are not signing and certifying compliance before completing the inspection.
4. The September 24, 2024 inspection record for the Log Sort Yard states that the ditches don't need cleaning; however, as noted in this report, I observed solids accumulation, scum and floating solids, and significant odors at some of the conveyance ditches during my inspection the day before (September 23, 2024). Weyerhaeuser should review their inspection procedures and their criteria for determining when BMPs need maintenance.
5. I noted that the inspector did not include a date with their certification and signature for two inspection records for the Log Sort Yard. Weyerhaeuser should ensure the inspector includes a date with their signature and certification of compliance.
6. It appears that the inspector wrote the wrong date for the inspection at the Log Sort Yard during the week of July 23-29, 2023. Weyerhaeuser should confirm that inspectors are accurately recording information on the inspection logs.
7. The inspection record for the April 17, 2023 inspection at the Lumber Mill states that Christine Yanik completed the inspection; however, Dave Solomon signed the inspection as the inspector. Weyerhaeuser should ensure that the person responsible for completing the inspection form also signs and certifies the inspection form.

Appendix A



Photo 1: Conveyance ditch collecting runoff from the East Sump, Export Dock pump station, and eastern portion of the log sort and export yard.



Photo 2: Drainage ditch north of TOB looking east toward the East Sump.



Photo 3: Inlet and bar screen at the conveyance ditch receiving the East Sump and eastern conveyance ditches runoff.



Photo 4: Conveyance ditch downstream of bar screen and inlet of East Sump, Export Dock pump, and eastern conveyance ditches.



Photo 5: Conveyance ditch located west of TOB before the check dam structure.



Photo 6: Conveyance ditch to the west of TOB looking south.



Photo 7: Conveyance ditch outlet downstream of the check dam located west of the TOB.



Photo 8: Outfall 001B sump at the Stacker Shop.



Photo 9: Scum and solids in the sump where Outfall 001B pumps to NDP’s Industrial WWTP.



Photo 10: Old oil-water separator near the Stacker Shop and NDP’s chips area.



Photo 11: Old oil-water separator inlet near the Stacker Shop and NDP’s chips area.



Photo 12: Discharge to NDP’s Chips Scale Sump from Weyerhaeuser.



Photo 13: Straw bales and woody debris accumulated near Weyerhaeuser’s discharge to NDP’s Chips Scale Sump.



Photo 14: Wood fines and bark accumulated before jersey barriers near the discharge to NDP’s Chips Scale Sump.



Photo 15: Bar screen at Weyerhaeuser’s discharge to NDP’s Chips Scale Sump.



Photo 16: Channel in the grassy area near the Longshoreman’s Lunchroom at the Export Dock.



Photo 17: Channel near the Longshoreman’s Lunchroom at the Export Dock leading to the edge of the property toward the Columbia River.



Photo 18: Runoff flowing to the Export Dock Sump from the east.



Photo 19: Runoff entering the Export Dock Sump.



Photo 20: Export Dock Sump.



Photo 21: Debarker area discharge overland to East Sump.

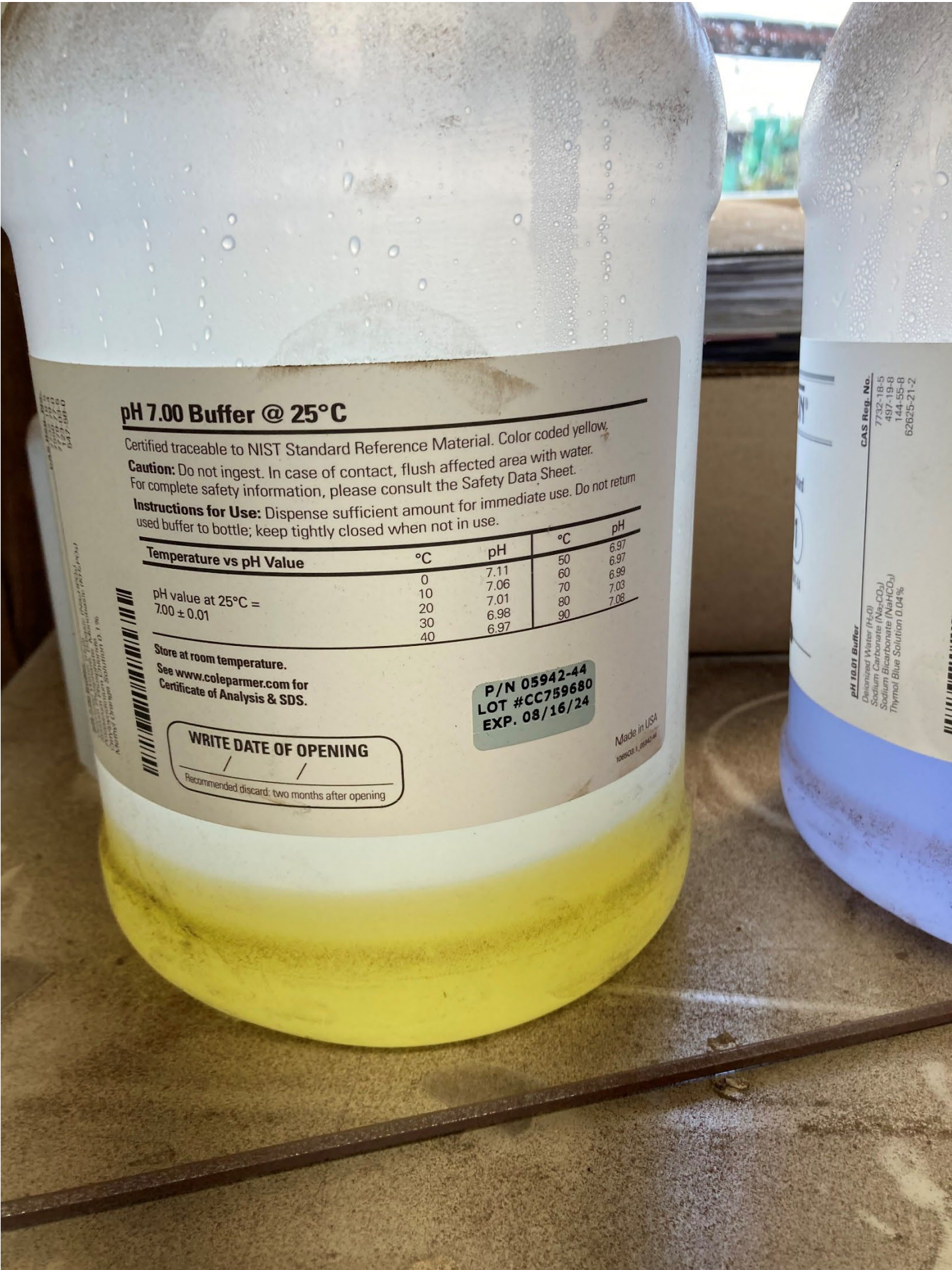


Photo 22: pH 7.0 SU buffer solution bottle at the Debarker Lunchroom.

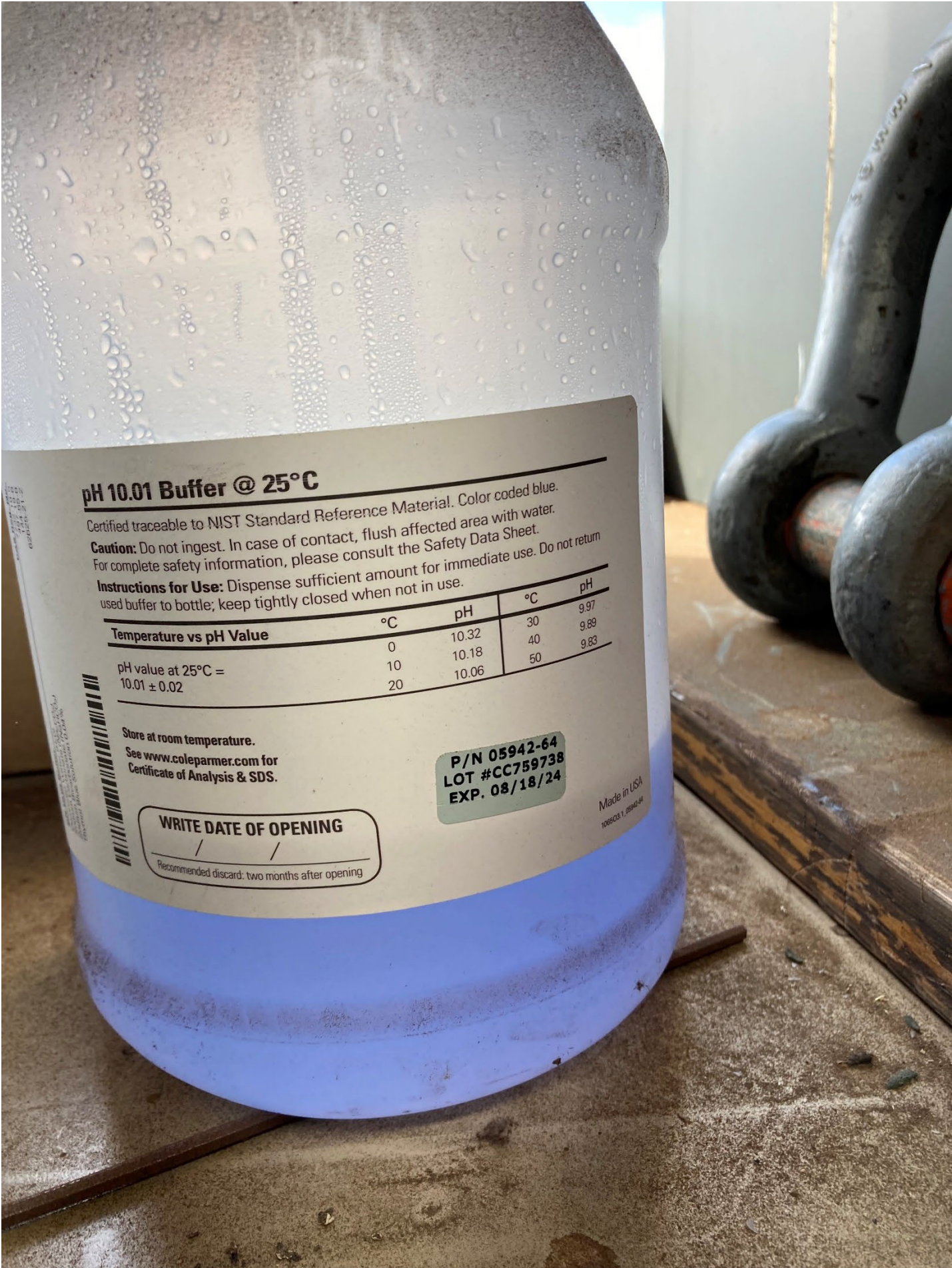


Photo 23: pH 10.0 SU buffer solution bottle at Debarker Lunchroom.



Photo 24: East Sump.



Photo 25: Inlet to the East Pond.



Photo 26: Sodium hydroxide tank level indicator.



Photo 27: East Pond looking from the Outfall 003B sampling and discharge platform.



Photo 28: Outfall 003B discharge to CDID Ditch #3 and effluent weirs.



Photo 29: Pipe from Pump Station 6 (Outfall 002B) entering Pump Station 7 (Outfall 005B).



Photo 30: Pump Station 6 (Outfall 002B) sump and Pipe A.



Photo 31: Manhole catch basin filtration structure in the Pipe A drainage area.



Photo 32: Manhole catch basin in the Pipe A drainage area.



Photo 33: Biochar bags in a manhole catch basin in the Pipe A drainage area.



Photo 34: Rock installed near a stormwater drainage ditch in the Pipe A drainage basin.



Photo 35: Stormwater culvert screen and drainage ditch in the Pipe A drainage basin.



Photo 36: Vegetated stormwater drainage ditch located in the Pipe A drainage basin.



Photo 37: Railroad tracks near the stormwater drainage ditch in the Pipe A drainage basin.



Photo 38: Stormwater catch basin on the neighboring CLC property apparently within the Pipe N drainage basin.



Photo 39: Stormwater sump near CLC’s Locomotive Shop apparently within the Pipe N drainage basin.



Photo 40: Outfall 004B discharge to CDID Ditch #3.



Photo 41: Northern Drainage Ditch discharge into the Outfall 004B sump from the western side of the ditch.



Photo 42: Northern Drainage Ditch discharge into Outfall 004B sump from the eastern side of the ditch.



Photo 43: Outfall 008B discharge to NDP’s Industrial WWTP.