



Longview Lumber • PO BOX 931 • Longview, WA 98632

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Weyerhaeuser Lumber Storeroom
Longview, WA 98632

March 13, 2025

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

Subject: Response to January 23, 2025, Letter Regarding September 2024 Announced Non-Sampling Water Quality Compliance Inspection Report
Weyerhaeuser NR Company – Longview Lumber
NPDES Permit WA0991014

Dear Ms. Brotherton:

Weyerhaeuser NR Company (Weyerhaeuser) appreciates the opportunity to provide this response to the letter issued by the Department of Ecology (Ecology) to Weyerhaeuser on January 23, 2025, regarding the September 2024 Announced Non-sampling Water Quality Compliance Inspection Report (Inspection Report). The inspection was conducted by Ecology for NPDES Permit No. WA0991014 (permit) on September 23, 2024. The Inspection Report listed a warning for two alleged violations identified during the inspection. Specifically, this letter responds to the alleged violations or potential violations that Ecology requested be responded to and also provides clarifications in response to Ecology's listed areas of concern.

Response to Issues Identified as Violations or Potential Violations

Ecology inspection report language is included in *italics*, and Weyerhaeuser responses follow directly in **bold**, below.

Listed Violation

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.*

- d. *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.*

Weyerhaeuser resolved this issue. Weyerhaeuser collected priority pollutant samples for Outfall 002B, 005B, and 006B on July 25, and Outfall 001B July 30, 2024, before the September Ecology inspection. The sample from Outfall 008B was collected on October 16, 2024. Outfalls 002B, 005B, and 006B data were received on August 27, 2025. Outfall 008B and 001B data were not received until December 2024 and January 2025, respectively. On December 11, 2024, Weyerhaeuser requested an update from the lab, Specialty Analytical, as we had still not received analytical results. On December 13, Outfall 008B data was received. On January 24, Weyerhaeuser re-confirmed status with the reporting laboratory for the remaining Outfall 001B data. At that time, the lab indicated there had been an error delaying the transmittal of the Outfall 001B sample results. The transmittal of sample results was attempted by Specialty Analytical on August 27, 2024, but a system error caused the correspondence to not be sent. Weyerhaeuser received the data package on January 24, 2025. Please see the attached associated correspondence from the laboratory documenting this issue. Weyerhaeuser completed submittal of the analytical data to the Ecology Secure Access Washington (SAW) WQWebPortal on January 31, 2025.

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.*

During the week of April 28 to May 2, 2024, specifically April 29, 2024, a pond dredge dewatering sample was collected from Outfall 001B. A field staff member collected the sample, and within 15 minutes of sample collection, analyzed for pH with a handheld calibrated pH probe. This value was recorded on the laboratory chain of custody for the dewatering sample. This field-collected pH result was included within Specialty Analytical lab report, Order 2404326, which was received by Weyerhaeuser on May 6, 2024. Weyerhaeuser confirmed, via email communication with you on January 29, 2025, that this pH measurement should be sufficient for the weekly pH sampling requirement. Please see the attached correspondence regarding the pH measurement.

Area of Concern

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.*

Weyerhaeuser is currently consolidating responsibility for on-site inspections and sampling from multiple people in different operations areas, down to one inspector for the entire Longview facility. Backup inspectors will continue to be available to ensure coverage and are trained in facility inspection and permitting requirements. The single inspector will complete the inspections at the established frequency, and all associated inspection records will now be stored in a single location to simplify review of inspection records. This inspector will continue to conduct inspections at their specified intervals and ensure that the appropriate portions of the facility are observed, and it is expected

that this change will allow for a higher level of training related to observation of facility BMPs, as well as a single point of contact regarding any necessary changes to be made to facility BMPs. Additionally, Weyerhaeuser has increased solids removal from annual (one time per year) to biannual (two times per year) within the conveyance system, including outfalls and pump stations, to improve water quality of the conveyance systems. This change is currently being incorporated into the facility SWPPP and O&M Manual, which will be provided to Ecology when complete.

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.*

Weyerhaeuser inspectors noted this issue before receipt of the September 2024 Ecology inspection report and documented the exposed area of soil and erosion above the outlet culvert. As of December 21, 2024, this has been fixed.

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.*

Weyerhaeuser inspectors noted this issue before receipt of the September 2024 Ecology inspection report. As of December 7, 2024, this has been fixed. As mentioned above, Weyerhaeuser has changed the solids removal frequency from annual (one time per year) to biannual (two times per year) within the conveyance system, including pump stations, to improve water quality of the conveyance systems. Weyerhaeuser recently fully opened the gate valve, that was found to be partially closed, on the overflow pipe at the top of this check dam.

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.*

Weyerhaeuser inspectors noted this before receipt of the September 2024 Ecology inspection report. As of December 21, 2024, solids have been removed from the outfall 001B sump. As mentioned above, Weyerhaeuser has increased solids removal from annual (one time per year) to biannual (two times per year) within the conveyance system, and pump stations, to improve water quality of the conveyance systems.

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.*

The roadway and bark storage area near the decommissioned oil-water separator are regularly maintained, with appropriate BMPs established for these areas in the site SWPPP. As noted by Ecology, this material is not a waste, and is a product maintained on site before it can be hauled offsite for resale. BMPs are and will continue to be maintained and reevaluated, as needed, across the site. As such, Weyerhaeuser is currently working to relocate the bark storage pile away from the access road, towards an existing log deck storage area to the south. Once the log deck is redistributed within the facility, the bark storage location will shift to the south; this is anticipated to be completed as soon as practical.

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.*

The Log Sort Yard and Export Dock are maintained in accordance with the site SWPPP, including a minimum of daily sweepings of these areas. BMPs are and will continue to be maintained and reevaluated, as needed, across the site. As mentioned above, Weyerhaeuser has increased solids removal from annual (one time per year) to biannual (two times per year) within the conveyance system and pump stations, to improve water quality of the conveyance systems.

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.*

Based on activities that occur within this area of the site, Weyerhaeuser understands this area consists of non-industrial stormwater, only. Activities occurring within this bermed portion of the site include employee parking, and those related to an employee breakroom. However, to be more certain regarding the status of industrial stormwater within this area, Weyerhaeuser is evaluating the design of re-grading this portion of the export yard to eliminate uncertainty regarding stormwater discharge.

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.*

Weyerhaeuser confirms site pH buffer solutions have been repurchased, are not expired, and are now stored in a single location to more readily check adequate unexpired supply. In fact, all stormwater sample equipment and materials, including pH buffer solutions, are now stored in a single location to reduce the likelihood of sampling supply mismanagement.

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.*

As mentioned above, Weyerhaeuser has increased solids removal from annual (one time per year) to biannual (two times per year) within the conveyance system and pump stations, to improve water quality of the conveyance systems.

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.*

Weyerhaeuser repaired Pipe A on Friday, September 20, 2024. This location is inspected regularly, and subsequent leaks have not been observed since September 2024. Weyerhaeuser will continue to inspect, evaluate, and repair this location, if needed.

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.*

Weyerhaeuser is continuing to evaluate the source of this debris and believes the debris may be coming from offsite and/or neighboring properties. The Pipe A drainage area is regularly inspected. Trash and debris are continuing to being identified and removed, as needed, as well as further identifying the source of the material to stop it from being transported into the ditch.

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.*

Weyerhaeuser reviewed these catch basin drains and related manholes near the locomotive shop. Based on knowledge of the stormwater infrastructure in the area, it appears that the stormwater is exiting through one of two pipes within the manhole, the north pipe, and flowing into the Weyerhaeuser stormwater system that exits through Pipe M. Additional investigation is needed, and access to the system and manholes needs to be coordinated with adjoining property owners. Weyerhaeuser will continue to investigate this area to further identify associated stormwater pathways.

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.*

As mentioned above, Weyerhaeuser confirms site pH buffer solutions have been repurchased, are not expired, and are stored in a single location. Additionally as above, Weyerhaeuser is currently consolidating responsibility for on-site inspections from multiple people in different operations areas, down to one inspector for the entire Longview facility. Backup inspectors will continue to be available to ensure coverage and are trained in facility inspection and permitting requirements. The single inspector will complete the inspections at the established frequency, and all associated inspection records will now be stored in a single location to simplify review of inspection records. This inspector will continue to conduct inspections at their specified intervals and ensure that the appropriate portions of the facility are observed, and it is expected that this change will allow for a higher level of training related to observation of facility BMPs.

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.*

Weyerhaeuser maintains this area in accordance with the site SWPPP and related best practices. The BMPs in this area (straw bales) appear to be working as designed, slowing water flows to allow solids settling prior to their conveyance to the wastewater treatment plant. This area is inspected weekly, and accumulated solids are removed on regular intervals. Additionally, straw bales are regularly inspected and replaced on an as-needed basis.

SWPPP & 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.*

The Site SWPPP is currently under review and is scheduled to be updated. This is anticipated to be submitted to Ecology by the May 15, 2025 deadline. The updated Site O&M manual is in the process of being updated and will be submitted to Ecology via the SAW WQWebPortal once complete, anticipated Summer 2025.

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.*

The Site SWPPP is currently under review and is scheduled to be updated. This is anticipated to be submitted to Ecology by the May 15, 2025 deadline. The updated Site O&M manual is in the process of being updated and will be submitted to Ecology via the SAW WQWebPortal once complete, anticipated Summer 2025.

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.

The Site SWPPP is currently under review and is scheduled to be updated. This is anticipated to be submitted to Ecology by the May 15, 2025 deadline. The updated Site O&M manual is in the process of being updated and will be submitted to Ecology via the SAW WQWebPortal once complete, anticipated Summer 2025.

In addition to the SWPPP revision, Weyerhaeuser is currently moving all SWPPP inspection forms to a new internal electronic proprietary stormwater software program. Updated inspection form templates will be included within the revised SWPPP. Once software migration is completed, all inspections will be conducted using an electronic tablet. Inspectors will be required to sign in using an employee-specific account ID. Each inspector will be able to mark the inspection as complete, and the software will encode the form with a timestamp and accompanied employee name. Weyerhaeuser understands the employee-specific timestamp will be sufficient for documenting inspection completion.

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.*

Weyerhaeuser is in the process of updating both the site SWPPP and the Site O&M manual. Each document is being reviewed and updated in conjunction with each other to ensure consistent and accurate information.

Calibration Records and 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.*

Weyerhaeuser does not have calibration records for flow meters. Please see the attached correspondence from the flow meter manufacturer, VEGA. September 26, 2024 correspondence indicates VEGA regularly tells customers that non-contact devices do not need to be re-calibrated after initial factory calibration. Although it is not 'calibration', Weyerhaeuser staff periodically (once per month) verify flows and water levels are consistent with flow meter data. Levels are measured/calculated using water level sensors and Weyerhaeuser's weir flow calculation spreadsheets. Monthly water level verification is available from January 2024 through October 2024. However, November through December 2024 data is unavailable, as it was incorrectly saved by site personnel.

As mentioned above, Weyerhaeuser is currently consolidating on-site inspectors and documentation storage from multiple people and areas across the facility, down to one. Consolidating to one inspector and document storage location is expected to minimize the chance for confusion over responsibility for instrument calibration and records retrieval. pH calibration records are available and can be provided, upon request.

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.*

Weyerhaeuser understands that manual data entry can have potential for transcription errors. Weyerhaeuser will work to improve the process to double-check that DMR data entries are correct prior to submittal.

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.*

Weyerhaeuser understands that manual data entry can have potential for transcription errors. Weyerhaeuser will work to improve the process to double-check DMR data entry prior to submittal, and report correct information to

Ecology. Additionally, Weyerhaeuser will confirm significant figures and rounding training with field staff and will only record accurate and appropriate significant figures on sample collection forms.

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. Weyerhaeuser understands that manual data entry can have potential for transcription errors. Weyerhaeuser will work to improve the process to double-check DMR data entry prior to submittal, and report correct information to Ecology.*

Stormwater Inspections

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.*

Weyerhaeuser has reviewed available files.

The Log Sort Yard's records previously had been filed in a non-central location, and have since been consolidated, including Inspections for outfall 003B, 007B, and 009B. Inspection records for Outfall 004B are available, but were not certified by the former mill manager, who had changed positions within Weyerhaeuser. As mentioned above, Weyerhaeuser is consolidating inspectors and record storage locations to reduce record retention and signatory issues. Additionally, and as included above, Weyerhaeuser is transitioning to a proprietary stormwater software program that will resolve signatory issues. The inspection records mentioned above have been collected and can be provided to Ecology upon request. As indicated within the December 24 – 30, 2023 inspection record, the mill was inoperable this week. The former environmental manager came to the site to perform the associated SWPPP inspection and collect the stormwater samples for that week. However, this person was terminated from Weyerhaeuser after collecting the samples but before the inspection could be completed and/or documented.

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.*

As indicated above, Weyerhaeuser is currently moving all SWPPP inspection forms to a new internal electronic proprietary stormwater software program. Once software migration is completed, all inspections will be conducted using an electronic tablet. Inspectors will be required to sign in using an employee-specific account ID. The software will automatically record the date, time and name of the individual documenting each observation within the electronic tablet and software program. Weyerhaeuser understands the employee-specific timestamp will be sufficient for documenting inspection completion.

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.*

Weyerhaeuser understands that manually transcribed inspection forms can have potential for errors. Weyerhaeuser believes this was a clerical error and will ensure that the stormwater inspector is appropriately trained and that they verify correct information is included on inspection forms, including signatory dates. Related to this concern, when the migration to the proprietary stormwater software is complete, the electronic records and automatic timestamps will resolve this issue.

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. As mentioned above, Weyerhaeuser has increased solids removal from annual (one time per year) to biannual (two times per year) within the conveyance system and pump stations, to help ensure optimal function of the conveyance systems. Additionally, the facility inspector has been retrained on cleaning thresholds for the conveyance systems to ensure appropriate solids removal schedules are maintained.*

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.*

Weyerhaeuser understands that manually transcribed inspection forms can have potential for errors. Weyerhaeuser believes this was a clerical error and will ensure that the stormwater inspector is appropriately trained and that they verify correct information is included on inspection forms, including signatory dates. Related, when the migration to the proprietary stormwater software is complete, the electronic records and automatic timestamps will resolve this issue.

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.

Weyerhaeuser understands that manually transcribed inspection forms can have potential for errors. Weyerhaeuser believes this was a clerical error and will ensure that the stormwater inspector is appropriately trained and that they verify correct information is included on inspection forms, including signatory dates. Related, when the migration to the proprietary stormwater software is complete, the electronic records and automatic timestamps will resolve this issue.

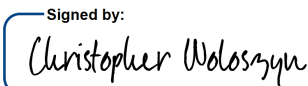
6. *The inspection record for the April 17, 2023 inspection at the Lumber Mill states that Christine Yanik completed the inspection; however, Dave Solomon signed the inspection as the inspector. Weyerhaeuser should ensure that the person responsible for completing the inspection form also signs and certifies the inspection form.*

Weyerhaeuser believes this was a clerical error. At that time period, the facility was between environmental managers (Carter Marr and the former manager), and the regular inspection staff were unavailable. Christine Yanik completed this inspection, and the regular inspector, Dave Solomon, incorrectly signed the record. When the migration to the proprietary stormwater software is complete, the electronic signatures and automatic timestamps will resolve this issue.

* * *

Thank you for the opportunity to clarify these items. Please contact me if you have questions regarding this response to your letter.

Sincerely,

Signed by:

058101BC2E35474...

Christopher Woloszyn
Unit General Manager

Attachments:

A - Laboratory, Agency and Vendor E-mail correspondence

Marr, Carter

From: Brotherton, Kelsey (ECY) <keho461@ecy.wa.gov>
Sent: Wednesday, January 29, 2025 10:41 AM
To: Marr, Carter
Cc: Yanik, Christine; Toffol, Emily (ECY); Ogle, Stephanie (ECY)
Subject: [EXTERNAL] RE: September 2024 Inspection Report - Potential Violation Follow Up

No problem. Thanks for pointing that out, Carter. I missed that too while looking at the lab report.

I think this should be good and you can consider the potential violation from the inspection report resolved. You don't need to make any revisions to the April 2024 DMR. I'd recommend saving a copy of the lab report with your other pH analysis records for Outfall 001B, though, just to prevent future questions about the reported result in the DMR.

Thanks,
Kelsey

From: Marr, Carter <Carter.Marr@weyerhaeuser.com>
Sent: Wednesday, January 29, 2025 10:38 AM
To: Brotherton, Kelsey (ECY) <keho461@ecy.wa.gov>
Cc: Yanik, Christine <Christine.Yanik@weyerhaeuser.com>; Toffol, Emily (ECY) <ETOF461@ECY.WA.GOV>; Ogle, Stephanie (ECY) <stog461@ECY.WA.GOV>
Subject: RE: September 2024 Inspection Report - Potential Violation Follow Up

External Email

Hi Kelsey,

Looking into that lab report further, I see I was mistaken when I said the lab had conducted this analysis. You can see on the attached lab report that the analyst is marked as client on page 2 of the pdf, the value of 7.02 SU is included on the COC in the file (page 11) and that the lab wasn't asked to analyze the sample for pH. They did include it in the report file though, which is what created the mistake.

Sorry for the confusion here!

Thanks,

Carter

From: Brotherton, Kelsey (ECY) <keho461@ecy.wa.gov>
Sent: Wednesday, January 29, 2025 10:14 AM
To: Marr, Carter <Carter.Marr@weyerhaeuser.com>
Cc: Yanik, Christine <Christine.Yanik@weyerhaeuser.com>; Toffol, Emily (ECY) <ETOF461@ECY.WA.GOV>; Ogle,

Stephanie (ECY) <stog461@ECY.WA.GOV>

Subject: [EXTERNAL] RE: September 2024 Inspection Report - Potential Violation Follow Up

Hi Carter,

Thanks for the quick follow-up on this inspection item.

So if I'm understanding correctly, the pH result reported in the DMR for Outfall 001B on April 29, 2024 is the pH result from the contract lab? If that's the case, the pH result isn't a valid result because it wasn't analyzed within 15 minutes of sample collection as required by [40 CFR 136.3\(e\) \(Table II\)](#).

If Weyerhaeuser didn't analyze pH onsite for the discharge at Outfall 001B on 4/29/2024, you'll need to revise and resubmit the April 2024 DMR to remove the reported pH value.

Let me know if you have any questions.

Thanks,
Kelsey

From: Marr, Carter <Carter.Marr@weyerhaeuser.com>

Sent: Friday, January 24, 2025 3:30 PM

To: Brotherton, Kelsey (ECY) <keho461@ecy.wa.gov>

Cc: Yanik, Christine <Christine.Yanik@weyerhaeuser.com>; Toffol, Emily (ECY) <ETOF461@ECY.WA.GOV>; Ogle, Stephanie (ECY) <stog461@ECY.WA.GOV>

Subject: September 2024 Inspection Report - Potential Violation Follow Up

External Email

Hi Kelsey,

I've dug into the potential violation regarding the pH value reported on April 29, 2024 and I've found the source for that data. This data point was from the attached lab report. When the dredge was removed from the pond in April 2024, it was taken to the Outfall 001B to be cleaned off. This practice was approved by both NDP and the department of Ecology. Ecology also requested that we collect a sample from the washings as they were being directed to the 001B outfall. This sample was analyzed for pH by the lab and this is where the 7.02 SU report came from.

We will also be submitting a formal response to the other concerns you brought up in the report that did not result in a violation or potential violation.

Thank you again,

Carter Marr, BSc
Facility Environmental Manager

Weyerhaeuser – Longview Lumber
2901 Industrial Way, Longview WA 98632

Office: 780-851-3378

E-Mail: carter.marr@weyerhaeuser.com

Marr, Carter

From: specialtyanalytical@khemia.com
Sent: Friday, January 24, 2025 12:54 PM
To: Marr, Carter
Cc: PM@specialtyanalytical.com
Subject: [EXTERNAL] Analytical Report: 2407267, Priority Pollutants/ Outfall 001B
Attachments: Rpt_2407267_Final_v1.pdf

Hello,

Your analytical report is attached to this email. Please feel free to contact us if you have any questions.

Have a great day,

Julie Clay
Operations Mgr.
julie@specialtyanalytical.com
9011 SE Jannsen Rd
Clackamas, Oregon 97015
Specialty Analytical
TEL: TEL: 503-607-1331
www.specialtyanalytical.com

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Marr, Carter

From: julie@specialtyanalytical.com
Sent: Friday, January 24, 2025 12:54 PM
To: Marr, Carter
Subject: RE: [EXTERNAL] RE: Priority Pollutants Results for 001B & 008B Outfall results

Hi Carter

It looks like we tried to send this back in August and it got stuck somewhere in the process. I have sent it out. Please let me know if you need anything else.

Thank you,

*Julie Clay
Operations Manager
Specialty Analytical
503-607-1331*

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From: Marr, Carter <Carter.Marr@weyerhaeuser.com>
Sent: Friday, January 24, 2025 11:53 AM
To: julie@specialtyanalytical.com
Subject: RE: [EXTERNAL] RE: Priority Pollutants Results for 001B & 008B Outfall results

Hi Julie,

Since this email, we've received results for the 008B sample, but I'm still waiting on results for the one from 001B. Can you provide an update on that? I believe the sample was collected in July?

Carter

From: julie@specialtyanalytical.com <julie@specialtyanalytical.com>
Sent: Wednesday, December 11, 2024 2:18 PM
To: Marr, Carter <Carter.Marr@weyerhaeuser.com>; Mandy@specialtyanalytical.com; polly@specialtyanalytical.com
Subject: [EXTERNAL] RE: Priority Pollutants Results for 001B & 008B Outfall results

Hi Carter

It looks like we are still waiting for the 625 and 608 subcontracting report. The sample receipt page listed the results to be completed between 11/10-11/13, which obviously was inaccurate. I have reached out for an update and will let you know what I find out.

Thank you,

Julie Clay
Operations Manager
Specialty Analytical
503-607-1331

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From: Marr, Carter <Carter.Marr@weyerhaeuser.com>
Sent: Wednesday, December 11, 2024 2:09 PM
To: julie@specialtyanalytical.com; Mandy@specialtyanalytical.com; polly@specialtyanalytical.com
Subject: Priority Pollutants Results for 001B & 008B Outfall results

Hi there,

Can you check into the sample results for priority pollutants from the 001B and 008B samples?

Thanks,

Carter Marr, BSc
Facility Environmental Manager

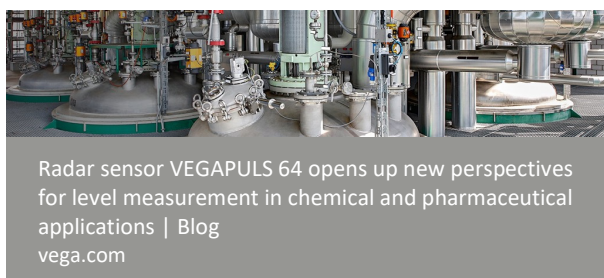
Weyerhaeuser – Longview Lumber
2901 Industrial Way, Longview WA 98632
Office: 780-851-3378
E-Mail: carter.marr@weyerhaeuser.com

Marr, Carter

From: Hungerford, Chris <c.hungerford@vega.com>
Sent: Thursday, September 26, 2024 12:49 PM
To: Marr, Carter
Subject: Re: [EXTERNAL] - RE: [EXTERNAL] - RE: [EXTERNAL] - RE: [EXTERNAL] - VegaPulse 6X 80 GHz Calibration Question

Let me see if I can find something in the white pages. And I'm sure there isn't some in writing that the slogan "once calibrated always calibrated". I've seen devices out there 20 years that have not been re-calibrated.

Check out this link



Sent from my iPad

On Sep 26, 2024, at 12:07 PM, Marr, Carter <Carter.Marr@weyerhaeuser.com> wrote:

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Thanks Chris.

What are the odds you have a document that might support the statement that with a non-contact device, once it's calibrated it's calibrated? I briefly checked the operating manual that you'd sent and I didn't see anything regarding a "re-calibration frequency" in there.

Carter

From: Hungerford, Chris <c.hungerford@vega.com>
Sent: Thursday, September 26, 2024 10:19 AM
To: Marr, Carter <Carter.Marr@weyerhaeuser.com>
Subject: Re: [EXTERNAL] - RE: [EXTERNAL] - RE: [EXTERNAL] - VegaPulse 6X 80 GHz Calibration Question

Carter,

I usually tell customers with a non-contact device that once you calibrated it's calibrated. You might want to check weekly for a few just to make sure that it's reading correctly. If you do have the VEGA Tools app, on your phone or tablet and you have a Bluetooth puck you could just screen shot the measure value weekly that would be a way that compliance is met.

And I'm with you I don't believe if instruments reading right if you need to recalibrate it, it doesn't make sense but anyway anyways I hope that answer answers your questions. Give me a call or email if you need anything else thanks.

On Sep 26, 2024, at 9:45 AM, Marr, Carter
<Carter.Marr@weyerhaeuser.com> wrote:

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Hi Chris,

One question I do have is what kind of frequency do you guys recommend for calibration of these instruments? Would doing a verification on a weekly or so basis work? My permit does say it's supposed to be calibrated on a yearly basis, I just struggle with calibrating an instrument if verification is confirming its reading.

Thanks,

Carter

From: Hungerford, Chris <c.hungerford@vega.com>
Sent: Wednesday, September 25, 2024 6:46 PM
To: Marr, Carter <Carter.Marr@weyerhaeuser.com>
Subject: Re: [EXTERNAL] - RE: [EXTERNAL] - VegaPulse 6X 80 GHz Calibration Question

Carter,

Just let me know if you need anything. I'm always up in Longview at the paper mills. Good luck
Chris Hungerford
Direct Seller- Pacific NW
Cell (360) 600-9638

On Sep 25, 2024, at 2:12 PM, Marr, Carter
<Carter.Marr@weyerhaeuser.com> wrote:

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Hi Chris,

Sorry I've been out of the office all day. I don't THINK we'll need you out tomorrow. We've got a decision to make internally as we upgraded one of the two flow meters about a year and a half ago. To me it makes sense to upgrade the older one to the same model as the recently upgraded one, but I'll have to make the sale on that one as it doesn't sound like that's a cheap endeavour...

Thanks for getting back to me. It definitely kept me from digging around looking for calibration records that most certainly do not exist.

Carter

From: Hungerford, Chris <c.hungerford@vega.com>
Sent: Wednesday, September 25, 2024 12:18 PM
To: Marr, Carter <Carter.Marr@weyerhaeuser.com>
Subject: Re: [EXTERNAL] - VegaPulse 6X 80 GHz Calibration Question

Carter

I attached both the operating instructions and the quick set up menu. Sign up for a my Vega account. And download the Vega Tools app. From there you can print Documents that show the calibration info. I can come up tomorrow morning if you need me.

I also left you a message.

Chris Hungerford
Direct Seller- Pacific NW
Cell (360) 600-9638

On Sep 25, 2024, at 9:12 AM, Marr, Carter
<Carter.Marr@weyerhaeuser.com> wrote:

This e-mail originated from outside the company. Do not open attachments or click unknown source.

Hi Chris,

I've got a couple of VegaPulse 6x 80 GHz instruments here that I'm using to measure the height of a water body that is flowing over a v-notch in order to determine the volume of water exiting from two different stormwater outfalls. I've been asked by our regulator to provide calibration records for these instruments. Based on a quick search it doesn't look to me like they are set up for field calibration. Would you be able to confirm that for me?

If I'm wrong, would you happen to have calibration instructions handy?

I've tried submitting this through the online "contact us" option on the vega.com website and it's just frozen my browser both times.

Thanks,

Carter

Carter Marr, BSc
Facility Environmental Manager

Weyerhaeuser – Longview Lumber
2901 Industrial Way, Longview WA 98632
Office: 780-851-3378
E-Mail: carter.marr@weyerhaeuser.com