



WATER DIVISION INSPECTION REPORT

ARKANSAS
Department of Environmental Quality

AFIN: 07-00212	PERMIT #: ARR00C197	DATE: 3/4/2019
COUNTY: 07 Calhoun	PDS #: 107317	MEDIA: WN
GPS LAT: 33.754299 LONG: -92.374972 LOCATION: Entrance		

FACILITY INFORMATION

NAME:
Georgia-Pacific Wood Products

LOCATION:
1 Georgia Pacific Road

CITY:
Fordyce, AR 71742

INSPECTION INFORMATION

FACILITY TYPE: 2 - Industrial	INSPECTOR ID#: 101531 S - State		
FACILITY EVALUATION RATING: 4 - Satisfactory	INSPECTION TYPE: Industrial Stormwater		
DATE(S): 3/4/2019	ENTRY TIME: 10:08	EXIT TIME: 12:52	PERMIT EFFECTIVE DATE: 7/1/2014
			PERMIT EXPIRATION DATE: 6/30/2019

RESPONSIBLE OFFICIAL

NAME / TITLE:
Chris Morton / Plant Manager

COMPANY:
Georgia Pacific Wood Products LLC

MAILING ADDRESS:
P.O. Box 1095

CITY, STATE, ZIP:
Fordyce AR 71742

PHONE & EXT. / FAX:
870-352-6619 /

EMAIL:
Christopher.morton@gapac.com

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: **N**

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:

Dewayne Henry (Lic. #008767)/GP Fordyce Environmental Coordinator/edhenry@gapac.com

Julie Brimer/GP Fordyce Safety Coordinator

Robin Goldsby/ADEQ D8 Water Inspector

CONTACTED DURING INSPECTION: **Yes**

AREA EVALUATIONS

(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)

S	PERMIT	N	FLOW MEASUREMENT	M	STORMWATER
S	RECORDS/REPORTS	S	LABORATORY	S	FACILITY SITE REVIEW
S	OPERATION & MAINTENANCE	M	EFFLUENT/RECEIVING WATER	S	SELF-MONITORING PROGRAM
S	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS

1.) During the inspection, I observed a housekeeping activity of cleaning of stormwater ditches that was done in a manner that did not reduce or minimize the pollutants in the discharge (see Photos 1 and 3). Additionally, this activity was not described in the Stormwater Pollution Prevention Plan (SWPPP). This is a violation of permit conditions Part 3.1.6. and 4.2.6.1.1.

GENERAL COMMENTS

On March 4, 2019, I conducted an inspection at Georgia Pacific Wood Products LLC – Fordyce OSB Facility (GP Fordyce) with the above participants. GP Fordyce manufactures Oriented Strand Board (OSB) from raw logs. The manufacturing process produces pollutants such as sawdust, wood chips, and other wood materials from the stripping and cleaning of logs. Most of the OSB manufacturing is completed in a covered area, but there are also potential pollutants from the maintenance area and fueling locations. This inspection consisted of a records review and facility inspection.



Records Review:

During the inspection, I reviewed a recently updated site map, a SWPPP, and copies of the Stormwater Annual Report (SWAR) forms and associated sample information for 2018. Records are maintained electronically and I requested additional records to review following the inspection. All information reviewed was deemed complete and there were no errors or compliance issues with the forms and records. The SWPPP was completed by GBMc consultants and maintained by Dwayne Henry, GP Fordyce Environmental Coordinator. During the facility tour, I observed a housekeeping activity in which employees were cleaning dirt and debris from the stormwater ditches. The discharge being produced by this activity was turbid and contained pollutants produced by the housekeeping activity. I did not find a section in the SWPPP to explain the appropriate control measures chosen by this facility for this activity.

Facility Tour:

During the facility tour, I observed the sampled outfalls and the areas draining to all outfalls. When walking to Outfall 002, I observed one stormwater ditch to contain extremely black-colored water that was flowing (see Photo 1) while the adjacent ditch contained clear water that was flowing (see Photo 2). Mr. Henry stated that staff was cleaning the stormwater ditches. The discharge being produced from this activity had some control measures such as straw waddles, but it was discussed that this activity may need to be limited to dry weather operations or some other method to reduce pollutants discharged at Outfall 002 (see Photo 3). Outfall 003 discharges from a sedimentation basin (see Photo 4; Figure 1) and there were no observed issues with the discharge observed. Outfall 004 is in a location that does not have any industrial processes (see Photo 5; Figure 2) and it was discussed that this outfall may be removed from the outfalls listed to be sampled because there is no industrial practice or associated pollutants. Outfall 006 discharges from a sedimentation basin (see Photo 6; Figure 1) and no compliance issues were observed. All the areas of the facility were adequately maintained and no further compliance issues were observed at the time of inspection.

Following the inspection, we discussed removing Outfalls 009-012 (see Figure 2) as they are not associated with pollutants discharged from a sector A4 facility and incorporate mostly just vehicular traffic. An Outfall Modification Form is included with this inspection.

INSPECTOR'S SIGNATURE:  Michael Young	DATE: 3/20/2019
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 4/4/2019

Inspection Form Legend:

S = Satisfactory, M = Marginal, U = Unsatisfactory, Y = Yes, N = No, NI = Not Implemented, NA = Not Applicable,
NE = Not Evaluated –

If Y and a NI are check it means it is in the SWPPP but not implemented in the field which is a violation.

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S " M " U " NA " NE
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y " N " NA " NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	" Y " N <input checked="" type="checkbox"/> NA " NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input checked="" type="checkbox"/> Y " N " NA " NE
4. ALL DISCHARGES ARE PERMITTED:	<input checked="" type="checkbox"/> Y " N " NA " NE
Comments:	
SECTION B: STORM WATER POLLUTION PREVENTION PLAN EVALUATION	
PERMITTEE SWPPP MEETS PERMIT REQUIRMENTS	<input checked="" type="checkbox"/> S " M " U " NA " NE
1. Is the SWPPP available for review by ADEQ? (Part 4.4)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
2. Has SWPPP been updated since 07/01/2014, or later if required? (Part 4.1, Part 4.5)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
3. Does the SWPPP contain facility name, general permit tracking number, facility physical address, and SIC and NAICS codes? (Part 4.2.1)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
4. Pollution Prevention Team	
A. Does the SWPPP identify specific individuals or positions?(Part 4.2.2)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
B. Does the SWPPP outline the responsibilities of each member of the Pollution Prevention Team? (Part 4.2.2)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
5. Does the SWPPP contain a facility description (process diagram, general layout, storage of raw materials, the flow of goods and materials through the facility and seasonal variations)? (Part 4.2.3)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
6. Does the facility site map contain the following items?	
A) The size of the property in acres? (Part 4.2.3.1)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
B) The location and extent of significant structures and impervious surfaces? (Part 4.2.3.2)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
C) The direction of stormwater flow using arrows? (Part 4.2.3.3)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
D) The locations of all existing structural control measures? (Part 4.2.3.4)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
E) The locations of all receiving waters in the immediate vicinity of the facility? (Part 4.2.3.5)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
F) The locations of all stormwater conveyances including ditches, pipes, and swales? (Part 4.2.3.6)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
G) The locations of potential pollutant sources? (Part 4.2.3.7)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
H) The locations of all stormwater monitoring points? (Part 4.2.3.8)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
I) The locations of stormwater inlets and outfalls with unique identification code for each outfall with indications if one or more outfall is being treated as "substantially identical" and an approximate outline of the areas draining to each outfall? (Part 4.2.3.9)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
J) Where the stormwater discharges to municipal separate storm sewer system (MS4), if applicable? (Part 4.2.3.10)	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
K) The locations and descriptions of all non-stormwater discharges identified in the SWPPP? (Part 4.2.3.11)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
L) The locations of the following activities if they are exposed to precipitation? (Part 4.2.3.12)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Fueling Stations	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Vehicle and equipment maintenance and/or cleaning areas	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Loading and unloading areas	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Locations used for the treatment, storage, or disposal of waste	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Liquid storage tanks	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Processing and storage areas	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-byproducts used or created by the facility	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Transfer areas for substances in bulk	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Machinery	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
M) The locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants? (Part 4.2.3.13)	" Y " N " NI <input checked="" type="checkbox"/> NA " NE

7. A description of potential pollutant sources	
A) A list of industrial activities exposed to stormwater (Part 4.2.4.1)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
B) A list of pollutants associated with each identified activity, including all significant materials that have been handled, treated, stored, or disposed, and that have been exposed to stormwater in the 3 years prior to the SWPPP date (Part 4.2.4.2)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
C) Locations where spills/leaks could occur that may contribute pollutants to stormwater discharges and the corresponding outfall(s) (Part 4.2.4.3)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
D) A list of significant spills and significant leaks of toxic or hazardous pollutants that have occurred in areas exposed to precipitation or drained to a stormwater conveyance for three years prior to the SWPPP date (Part 4.2.4.3)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
E) Measures to identify and eliminate Non-stormwater Discharges (Part 4.2.4.4)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
F) Certification that outfalls have been tested for illicit Non-stormwater Discharges (Part 4.2.4.4)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
G) Location of storage piles containing salt used for deicing or other commercial or industrial purposes (Part 4.2.4.5)	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
H) A summary of existing discharge sampling data (Part 4.2.4.6)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
8. Measures and Controls (Part 4.2.5)	
A) Does SWPPP describe stormwater controls appropriate for the facility?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
B) Have the selected controls been implemented?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
9. Documentation of:	
A) Good Housekeeping (Part 4.2.6.1.1) – No documentation of ditch cleaning.	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
B) Preventative Maintenance (Part 4.2.6.1.2)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
C) Spills and Response Procedures (Part 4.2.6.1.3)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
D) Employee Training (Part 4.2.6.1.4)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
E) Monitoring – Benchmark, ELG, other (Part 4.2.6.2.1)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
F) Sample Location(s), Parameters, Limits, and Procedures (Part 4.2.6.2.2)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
G) Inspections (Part 4.2.6.3)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
a. Routine	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
b. Comprehensive	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
c. Name of Inspector	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
d. Schedule for Inspections	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
e. Specific items inspected, including outfalls	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
10. Does stormwater discharge to a 303(d) listed or TMDL stream? (Part 4.2.7.1)	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
If yes, are additional requirement met?	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
11. Does stormwater direct discharge to an ERW, NSW, or ESW? (Part 4.2.7.2)	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
If yes, are additional requirement met?	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
12. Is the SWPPP signed and certified? (Part 4.2.8)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Comments:	
SECTION C: MONITORING & INSPECTIONS	
PERMITTEE MONITORING MEETS PERMIT REQUIRMENTS	<input checked="" type="checkbox"/> S " M " U " NA " NE
1. Is the facility one of the four Effluent Guideline Facilities in the Permit? (Cement MFG, Fertilizer MFG, Steam Electric coal pile, Paving and Roofing Materials, or Airport Deicing)(Part 3.3.1)	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
A) Are all outfalls from the regulated process being sampled? (Part 3.3.2)	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
B) If coal pile run off is monitored, are all other stormwater flows excluded? (Part 3.3.1)	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
C) If airport with annual jet departures ≥ 1000, is effluent limit met? (Part 3.3.1)	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
B) If airport, is at least 60% of deicing fluid collected? (Part 3.3.1)	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
2. Which of the monitoring categories is this facility subject to: (Parts 1.5, 3.4)	
A) Are samples being collected for each monitoring period (annually)? (Part 3.6)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
B) Are samples being collected from the location specified in the NOI and SWPPP (Part 3.7)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
C) Has the permittee determined that some of the outfalls are similar? (Part 3.8.1)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Are the conditions on the ground still the same as documented for the similar outfalls (Part 3.8.1)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
D) Are all parameters for the monitoring category being sampled and analyzed? (Part 3.4)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
E) Were the samples collected during a measureable storm event? (Part 3.8.2.2)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
F) Were the samples properly preserved and analyzed? (Part 3.8.2.4)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
G) Are the sample locations suitable for the collection of a representative sample? (Part 3.8.2)	<input checked="" type="checkbox"/> Y " N " NI " NA " NE

3. Has any of the monitoring revealed an exceedance of the benchmark values for this facility?(Part 3.12.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
A) Has a process to develop a corrective action plan been started within 30 days of exceedances? (Part 3.12.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) Is the exceedance attributed to natural background pollutant level? (Part 3.12.2)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) If the exceedance is naturally occurring, has the Department been notified? (Part 3.12.2.3)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. Inspections (Part 5.1)	
A) Visual Site Inspections (minimum 4/year) (Part 5.1.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) At least one visual inspection conducted during a rain event	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) Inspections recorded and include: date of inspection, person doing inspection; major observations, and corrective actions required.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
D) Comprehensive Site Compliance Evaluation (Annual) (Part 5.1.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Comments:	

SECTION D: RECORD KEEPING

PERMITTEE RECORD KEEPING AND REPORTING MEETS PERMIT REQUIRMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. Has SWAR for the previous year of monitoring been completed? (Part 5.2.4)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Include sample results, lab reports, chain of custody?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Significant findings of inspections?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Summary of corrective action plans?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
2. Is the SWAR signed? (Part 5.2.4.5)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Is permittee keeping copies of inspections? (Part 5.2.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Comments:	

SECTION E: FACILITY TOUR

PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. Any evidence of spills or leaks that have not been properly cleaned up as required by the SWPPP?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
2. Any evidence of erosion or un-stabilized ground?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Any controls, structures, or storage areas that are not as identified in the SWPPP?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
4. Any non-stormwater discharges <u>not</u> identified in the SWPPP? (see Part 1.6 of permit for list of allowable non-stormwater discharges)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
5. Any non-stormwater discharges that are not allowed under this permit? (see Part 1.6 of permit for list of allowable non-stormwater discharges)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
6. Are BMPs being properly operated and maintained? (Part 7.17)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
7. Are housekeeping procedures being implemented and are they sufficient?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
8. Toxicity testing recommended? (Part 6)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N
Comments:	

Water Division Photographic Evidence Sheet

Location:	Georgia-Pacific Wood Products				
Photographer:	Michael Young	Date:	03/04/2019	Time:	11:59
Witness:	Robin Goldsby	Photo #:	1		
Description:	Ditch that was being cleaned upstream. Note dark colored, turbid water.				



Photographer:	Michael Young	Date:	03/04/2019	Time:	12:00
Witness:	Robin Goldsby	Photo #:	2		
Description:	Stormwater ditch adjacent to ditch being cleaned.				



Location:	Georgia-Pacific Wood Products				
Photographer:	Michael Young	Date:	03/04/2019	Time:	12:01
Witness:	Robin Goldsby	Photo #:	3		
Description:	Outfall 002. Note extremely dark colored water.				



Photographer:	Michael Young	Date:	03/04/2019	Time:	12:08
Witness:	Robin Goldsby	Photo #:	4		
Description:	Outfall 003.				



Water Division Photographic Evidence Sheet

Location:	Georgia-Pacific Wood Products				
Photographer:	Michael Young	Date:	03/04/2019	Time:	12:10
Witness:	Robin Goldsby	Photo #:	5		
Description:	Outfall 004.				



Photographer:	Michael Young	Date:	03/04/2019	Time:	12:23
Witness:	Robin Goldsby	Photo #:	6		
Description:	Outfall 006.				



Figure 1. Overview of sampled IGP outfalls and location of ditch cleaning activities.

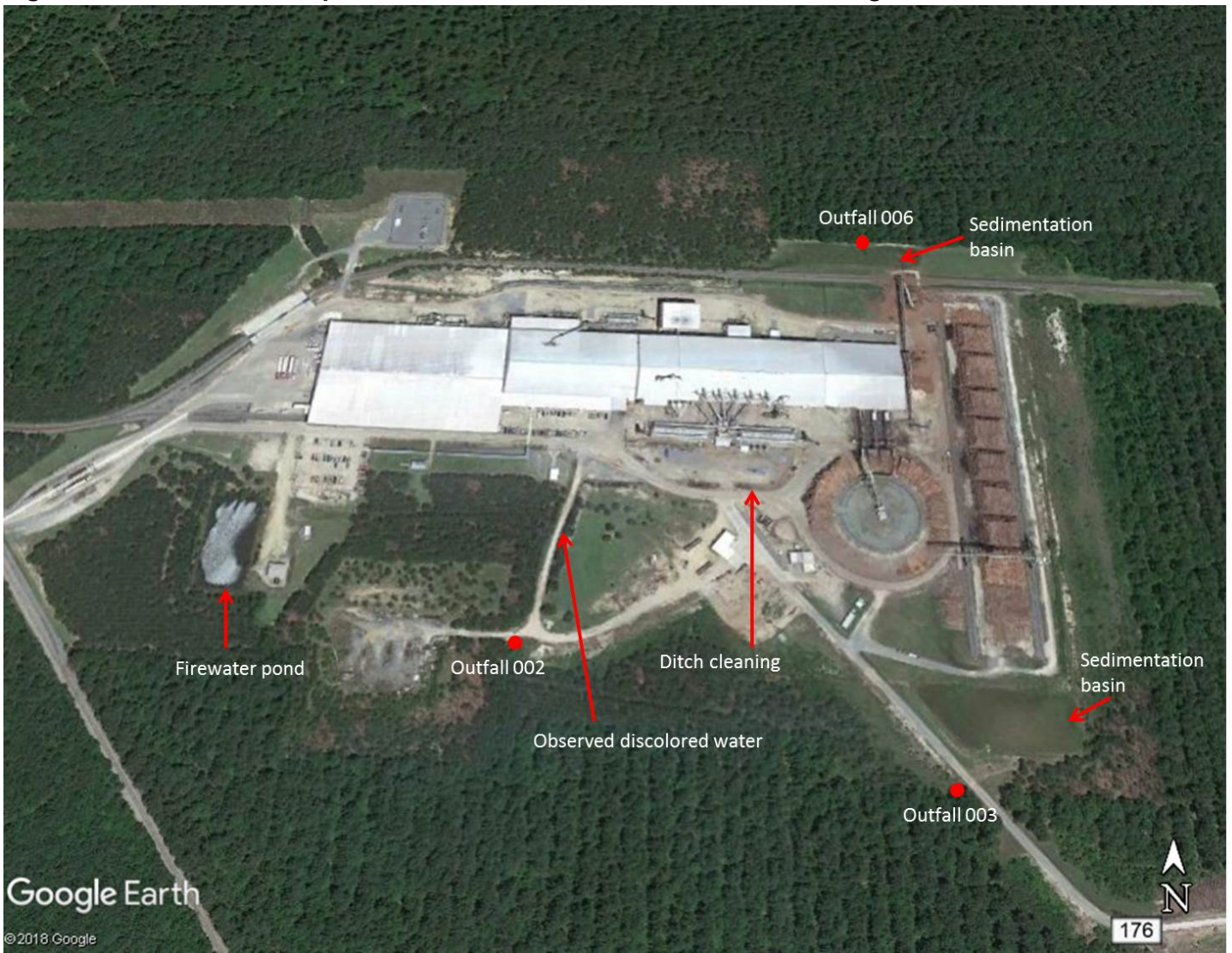
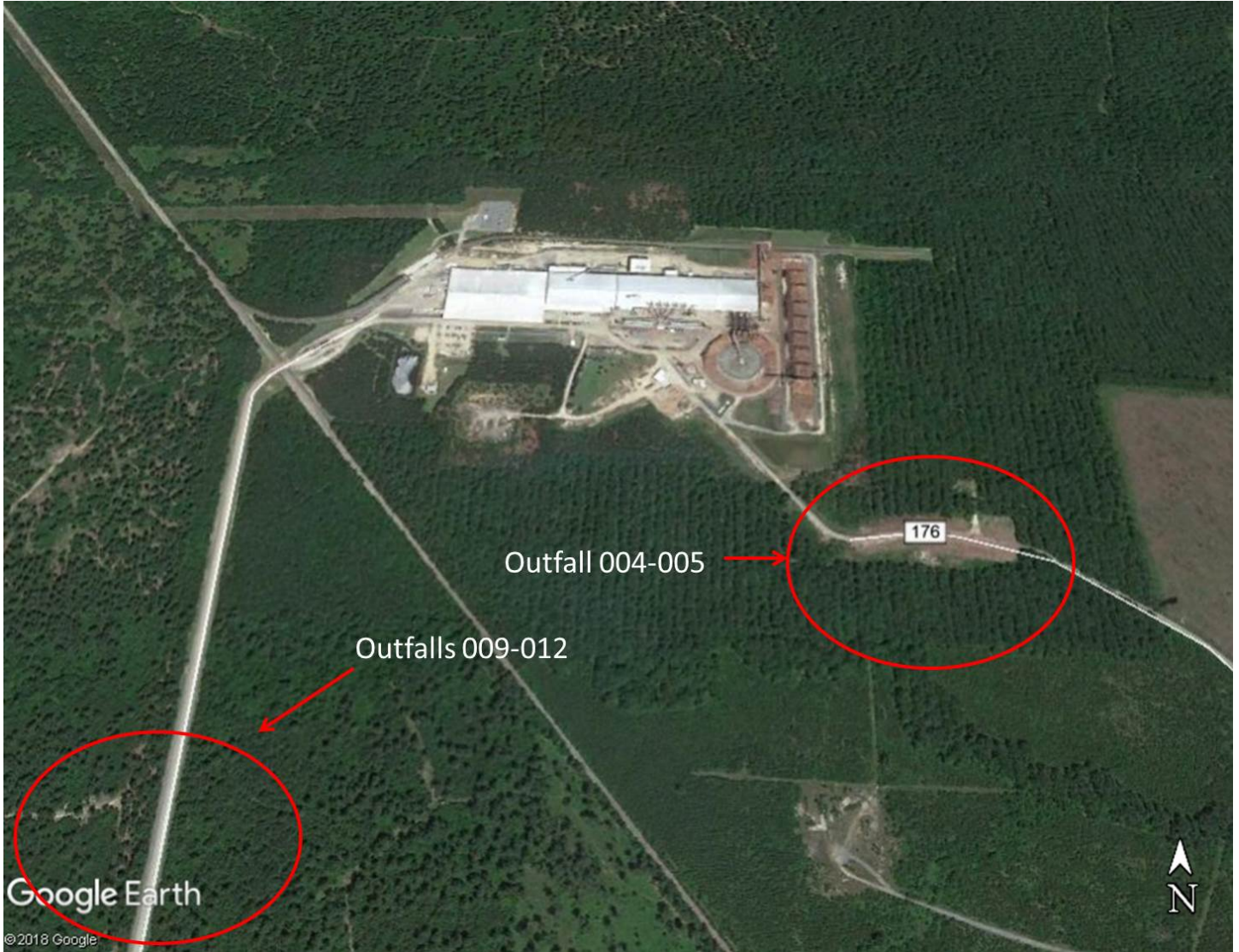


Figure 2. Overview of GP Fordyce with the location of IGP Outfalls 004, 005, 009, 010, 011 and 012 indicated. Note no industrial processes are occurring at these outfalls.



From: [Henry, Dewayne](#)
To: [Water-Inspection-Report](#); [McCabe, Kerri](#); [Morton, Christopher A](#); [Young, Michael](#)
Cc: [Bowling, Cliff](#); [Lathrop, Alison J. \(GP LAW\)](#)
Subject: RE: Georgia-Pacific Wood Products Inspection (Calhoun Co) AFIN: 07-00212
Date: Thursday, April 18, 2019 8:48:19 AM
Attachments: [image001.png](#)
[Inspection Findings response letter.pdf](#)
[SWPPP Section 5.2 addition.docx](#)
Importance: High

Please find attached the response letter in regards to the inspection and the SWPPP Section 5.2 attachment with the additional housekeeping item (o).

Thanks,

Dewayne

From: McCabe, Kerri <MCCABE@adeq.state.ar.us>
Sent: Friday, April 5, 2019 10:14 AM
To: Morton, Christopher A <Christopher.Morton@gapac.com>; Henry, Dewayne <EDHENRY@GAPAC.com>
Cc: Young, Michael <youngm@adeq.state.ar.us>
Subject: Georgia-Pacific Wood Products Inspection (Calhoun Co)

Sent by an external sender

Please find attached the inspection reports submitted by Inspector Young. Thank you.

Thank you for your timely submission of the recertification NOI for your IGP.

Kerri McCabe

Inspector Supervisor
ADEQ – Water Division
Field Services – Inspection Branch

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**Georgia-Pacific Wood
Products LLC**

Structural Panels Division
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(870) 352-7252 Telephone
(870) 352-6613 Facsimile

April 18, 2019

Mr. Michael Young
District 8 Inspector
ADEQ Office of Water Quality
P.O. Box 10340
El Dorado, Arkansas 71730-0024

RE: Georgia-Pacific Wood Products Inspection (Calhoun Co)
AFIN: 07-00212 **NPDES Permit No.: ARR00C197**

Mr. Young,

Georgia-Pacific Wood Products LLC (GP) is responding to the letter received on 4/5/19. We have reviewed the Summary of Findings for permit ARR00C197 and we respectfully disagree with the findings and offer the following comments.

The Summary of Findings noted that during the inspection, a housekeeping activity of cleaning of stormwater ditches was observed that was done in a manner that did not reduce or minimize the pollutants in the discharge. Additionally, this activity was not described in the Stormwater Pollution Prevention Plan (SWPPP) and therefore was considered a violation of permit conditions Part 3.1.6. and 4.2.6.1.1.

In response to the housekeeping activity of cleaning the stormwater ditches, we believe Section 5.7 of our SWPPP meets the "Management of Storm Water Runoff" permit condition (Part 3.1.6) and Section 5.2 of our SWPPP "Good Housekeeping" meets condition (Part 4.2.6.1.1)/ (Part 3.1.2).

Permit Citation 3.1.6 - Management of Runoff. The operator must implement appropriate measures to manage the runoff from the property in such a manner as to minimize the pollutants in the discharge. These measures may include the diversion of the runoff away from areas where pollutants may be present or the reuse of stormwater runoff where practicable, by the use of measures that divert the runoff, contain the runoff, or allow for reuse of the runoff. In selecting, designing, installing, and implementing appropriate control measures, the operator is encouraged to consult with EPA's internet-based resources relating to runoff management, including the sector-specific *Industrial Stormwater Fact Sheet Series*, (www.epa.gov/npdes/stormwater/msgp), *National Menu of Stormwater BMPs*

(www.epa.gov/npdes/stormwater/menuofbmps), and *National Management Measures to Control Nonpoint Source Pollution from Urban Areas* (www.epa.gov/owow/nps/urbamm/index.html), and any similar publications.

SWPPP Content:

Section 5.7 -Management of Storm Water Runoff - - - - The management of storm water runoff at the facility is achieved through existing structural controls such as the use of concrete curbing, culverts, and surface drainage systems. Vegetated drainage swales/ditches, retention areas, and containment structures for areas where spills or leaks are more likely to occur are used to prevent pollutants from entering storm water runoff. Debris screens, diversion berms, and fiber rolls are utilized in areas where wood bark and fines are stored in order to minimize the materials from being discharged offsite. Emphasis is also placed on source control measures and BMPs discussed previously in this Plan.

Permit Citation:

4.2.6.1.1 Good Housekeeping (See Part 3.1.2)The operator must incorporate good housekeeping practices in an effort to keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers.

SWPPP Content :

Section 5.2 -Good Housekeeping - Measures designed to maintain a clean, orderly, and safe work environment contribute to the prevention of potential pollutant sources from coming into contact with and impacting storm water runoff. Good housekeeping reduces the potential for accidental spills caused by mishandling of significant materials and enhances proper operation and maintenance of industrial equipment and machinery. Fordyce OSB management and personnel are committed to following good housekeeping measures.

General order and cleanliness will be practiced and maintained throughout the facility. Each employee will be responsible for keeping work areas clean and orderly. Debris and waste materials must be properly disposed of in designated waste receptacles for subsequent disposal. Motivating and training employees to use good housekeeping techniques is essential to the effective implementation of each BMP. Fordyce OSB encourages employee participation in the utilization of good housekeeping measures through periodic training and communication as outlined in Section 5.5 of this SWPPP.

Elements of the site housekeeping program related to storm water management follow:

- a) Floors and ground surfaces are kept clean and dry by using brooms, shovels, vacuum cleaners or cleaning machines.
- b) Garbage and waste materials are regularly picked up and properly disposed.
- c) All spillage is promptly removed. Where it is impractical to constantly remove spillage (such as wood chip storage and handling areas), spillage is contained in the immediate area.
- d) Equipment is routinely inspected to make sure it is in proper working order.
- e) The importance of spill cleanup procedures is communicated to employees through safety meetings.
- f) Secondary containment is provided for tanks and drums used to store oils, lubricants, solvents, and other chemicals. Smaller containers (i.e., 55-gallon drums and smaller) are stored in covered areas to prevent contact with rainfall, especially containers that do not have secondary containment. Spill prevention and response procedures will be followed as outlined in Section 5.4 of this SWPPP.
- g) Secondary containment around aboveground storage tanks is kept free of water and debris.
- h) Containers, drums and bags of material are stored away from direct traffic routes to prevent accidental spills.
- i) Materials located outside are routinely inspected for evidence of spills or leaks of materials that could contribute to storm water pollution. Materials stored on-site for extended periods should be stored off the ground (e.g., on pallets) and covered with tarps when possible to prevent contact with storm water runoff.
- j) The portions of the facility located within the drainage areas leading to the storm water outfalls will be kept clear of debris and trash. Industrial equipment and material stored or used in these areas should include only those items necessary for required plant operations. Effort will be made after heavy rainfalls to collect any debris that may have accumulated around storm water drainage flow ways.
- k) Absorbents/drip pans will be used, as necessary, in an effort to minimize leakage around storage areas.
- l) Absorbent will be used around leaking equipment and during maintenance activities where applicable. Leaking equipment will be repaired quickly in an effort to minimize potential storm water impact.
- m) Good housekeeping measures are discussed during employee meetings as a general reminder of importance.
- n) Pollution prevention concepts, tips and reminders are publicized using visual aids posted around the facility.

We agree that as a result of the cleaning of BMP structures, there was some turbidity observed immediately past the concrete structure as noted in the Summary of Findings. However, as was also observed and discussed, the water flowing in the ditch prior to it reaching Outfall 002, appeared clearer and that the additional BMPs (fiber rolls "GeoHay") minimized the materials from being discharged offsite. Although this activity

is not specifically described in the SWPPP, maintenance of BMPs is required under the general permit to ensure proper operation of controls used to achieve compliance with the conditions of the permit.

Although we believe that the current practices described in our SWPPP meet the requirements of the general permit, we will block the stormwater conveyance leading to Outfall 002 as an additional preventative measure while cleaning the ditches to further reduce potential pollutants in the discharge. The SWPPP has been updated accordingly in Section 5.2 of the SWPPP.

If you have any questions or concerns regarding this, please feel free to contact Dewayne Henry at 870-352-6624.

A handwritten signature in cursive script, reading "Chris Morton", written over a horizontal line.

Chris Morton
Plant Manager
Fordyce OSB

5.2 Good Housekeeping

Measures designed to maintain a clean, orderly, and safe work environment contribute to the prevention of potential pollutant sources from coming into contact with and impacting storm water runoff. Good housekeeping reduces the potential for accidental spills caused by mishandling of significant materials and enhances proper operation and maintenance of industrial equipment and machinery. Fordyce OSB management and personnel are committed to following good housekeeping measures.

General order and cleanliness will be practiced and maintained throughout the facility. Each employee will be responsible for keeping work areas clean and orderly. Debris and waste materials must be properly disposed of in designated waste receptacles for subsequent disposal. Motivating and training employees to use good housekeeping techniques is essential to the effective implementation of each BMP. Fordyce OSB encourages employee participation in the utilization of good housekeeping measures through periodic training and communication as outlined in Section 5.5 of this SWPPP.

Elements of the site housekeeping program related to storm water management follow:

- a) Floors and ground surfaces are kept clean and dry by using brooms, shovels, vacuum cleaners or cleaning machines.
- b) Garbage and waste materials are regularly picked up and properly disposed.
- c) All spillage is promptly removed. Where it is impractical to constantly remove spillage (such as wood chip storage and handling areas), spillage is contained in the immediate area.
- d) Equipment is routinely inspected to make sure it is in proper working order.
- e) The importance of spill cleanup procedures is communicated to employees through safety meetings.
- f) Secondary containment is provided for tanks and drums used to store oils, lubricants, solvents, and other chemicals. Smaller containers (i.e., 55-gallon drums and smaller) are stored in covered areas to prevent contact with rainfall, especially containers that do not have secondary containment. Spill prevention and response procedures will be followed as outlined in Section 5.4 of this SWPPP.
- g) Secondary containment around aboveground storage tanks is kept free of water and debris.
- h) Containers, drums and bags of material are stored away from direct traffic routes to prevent accidental spills.
- i) Materials located outside are routinely inspected for evidence of spills or leaks of materials that could contribute to storm water pollution. Materials stored on-site

for extended periods should be stored off the ground (e.g., on pallets) and covered with tarps when possible to prevent contact with storm water runoff.

- j) The portions of the facility located within the drainage areas leading to the storm water outfalls will be kept clear of debris and trash. Industrial equipment and material stored or used in these areas should include only those items necessary for required plant operations. Effort will be made after heavy rainfalls to collect any debris that may have accumulated around storm water drainage flow ways.
- k) Absorbents/drip pans will be used, as necessary, in an effort to minimize leakage around storage areas.
- l) Absorbent will be used around leaking equipment and during maintenance activities where applicable. Leaking equipment will be repaired quickly in an effort to minimize potential storm water impact.
- m) Good housekeeping measures are discussed during employee meetings as a general reminder of importance.
- n) Pollution prevention concepts, tips and reminders are publicized using visual aids posted around the facility.
- o) Stormwater conveyance leading to Outfall 002 will be blocked as an additional preventative measure while cleaning the ditches to further reduce potential pollutants in the discharge.



A R K A N S A S
Department of Environmental Quality

June 5, 2019

Chris Morton, Plant Manager
Georgia Pacific Wood Products, LLC
P.O. Box 1095
Fordyce, AR 71742

RE: Georgia Pacific Wood Products - Response to Inspection (Calhoun Co)
AFIN: 07-00212 **NPDES Permit No.: ARR00C197**

Dear Mr. Morton:

I have reviewed the response pertaining to my March 4, 2019 inspection of the Georgia Pacific Wood Products, LLC Fordyce OSB Plant. The information provided sufficiently addresses the violations referenced in my inspection report. At this time, the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (501) 837-2073 or you may e-mail me at youngm@adeq.state.ar.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Young".

Michael Young
District 8 Field Inspector
Office of Water Quality