



Oregon

Tina Kotek, Governor

Department of Environmental Quality

Eastern Region Bend Office

475 NE Bellevue Drive, Suite 110

Bend, OR 97701

(541) 388-6146

FAX (541) 388-8283

TTY 711

March 11, 2024

Jessica Knight
Boise Cascade Wood Products, LLC
90 S. 21st Street
Elgin, OR 97827

Re: Warning Letter with Opportunity to Correct
Boise Cascade Wood Products, LLC
Elgin Facility
2024-WLOTC-8999
File #9444, WPCF #103020
Union County

Dear Jessica Knight:

Boise Cascade Wood Products, LLC, operates industrial wastewater treatment facilities at the Elgin (BCE) plant and reuses industrial wastewater pursuant to an Operations, Monitoring, and Management (OM&M) Plan under Water Pollution Control Facilities (WPCF) Permit #103020. The facility also is assigned coverage under the 1200-Z General Stormwater NPDES Permit for management of industrial stormwater. Based on a written report of non-compliance sent by the facility to DEQ on October 16, 2023, and follow-up communications about the incident, DEQ has documented the following violation of BCE's WPCF permit and Oregon environmental law.

Violation #1

WPCF Permit #103020 authorizes land application of industrial reuse water provided the activity is conducted in a manner that prevents runoff from the site (WPCF Schedule A, Condition 7). The written report submitted states that approximately 8,000 gallons of industrial reuse water ran off the West Land Application Site due to a contractor mistakenly not shutting off the irrigation system. Runoff went to a stormwater conveyance ditch and was bermed while cleanup commenced via pumping to the lined wastewater pond /oil water separator. Per the report, the discharge entered the ditch at what is described as Monitoring Point 009 under the draft Stormwater Pollution Control Plan covered by the facility's 1200-Z permit. Discharge to the ditch is not authorized under the facility's assigned WPCF permit.

Causing any wastes to be placed in a location where such wastes are likely to be carried to waters of the state by any means is a violation of ORS 468B.025(1)(a) and a Class II violation. See OAR 340-012-0055(2)(c). Class I violations are considered to be the most serious violations; Class III violations are the least serious.

Unpermitted discharges may result in water quality standards violations and impair the beneficial uses that the standards were established to protect. The facility reports that the spill was confined to the ditch and discharge to Martin Spring or surface waters did not occur prior to cleanup.

Corrective Actions

The facility must take actions under the OM&M plan to prevent runoff from the application of reuse industrial wastewater from the land application areas. The facility stated via email on 1/3/2024 they are pursuing the following best management practices as corrective actions:

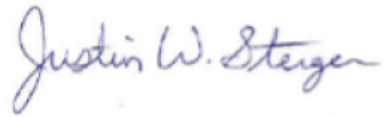
- Removing the water application duties from the scope of work for the contractor who farms the fields. Going forward, water applications for industrial reuse water will be managed by BCE personnel.
- Reduce application sets for the irrigation system from 6-12 hrs. to 4-8 hrs.
- Water application system improvements, investigating piping and nozzle conversions to reduce water output and increase uniform application along this field, working with Living Water Irrigation.
- Proposing to DEQ an NPDES 1200-Z stormwater permit expansion application to the north side of the manufacturing facility to control volume of water required to store in pond system. DEQ has not yet approved the proposed Stormwater Pollution Control Plan or the 1200-Z discharges proposed for the north side log yard area. These are pending final review and DEQ has been in discussion with the facility regarding potential changes in routing.

Summary:

This notice is a Warning Letter with opportunity to correct. DEQ does not intend to take formal enforcement action at this time. However, should you repeat this violation, the matter may be referred to DEQ's Office of Compliance and Enforcement for formal enforcement action, including assessment of civil penalties and/or a Department order. Civil penalties can be assessed for each day of violation.

If you believe any of the facts in this Warning Letter are in error, you may provide information to me at the office at the address shown at the top of this letter. DEQ will consider new information you submit and take appropriate action. DEQ endeavors to assist you in your compliance efforts. Should you have any questions about the content of this letter or desire any follow-up technical assistance, please contact me at (541) 714-0206.

Sincerely,

A handwritten signature in blue ink that reads "Justin W. Sterger". The signature is fluid and cursive, with the first name "Justin" being the most prominent.

Justin W. Sterger

DEQ Water Quality

ecc: Dale Treib, BC
Jeff Hafer, BC
Mike Hiatt, DEQ
Martha Cruse, DEQ
Anna Morgan-
Hayes, DEQ
Rhonda Smith, BC
Office of Compliance & Enforcement, DEQ

Appendix I: Non-Compliance Report – 10/16/2023

Boise Cascade Wood Products, LLC
Inland Region
90 S. 21st Street
Elgin, OR 97827



October 16, 2023

Justin Sterger, Senior Water Quality Permit Writer
Water Quality Program, ODEQ Eastern Region
Bend, Oregon Office
475 NE Bellevue Dr., Suite 110
Bend, OR 97701

RE: Elgin Complex, WPCF Permit 103020, Process Wastewater Noncompliance Notification

Mr. Sterger,

This letter is in follow-up to the October 10th phone call regarding notification of process water run-off from the West AR North field at the above-referenced facility, as required by permit condition Schedule F, Section B.3.c.. The run-off was discovered on October 10, 2023, at approximately 9:00 a.m. on the east side of the West AR North field (see SWPCP Appendix II.d., attached). The run-off flowed off the east end of the field at stormwater monitoring point (MP) 009 where it entered the culvert under the county road (Hallgarth Rd.) and exited following the stormwater ditch towards the East AR field. Process water did not discharge to waters of the State.

The source of the run-off was process water stored in PWP1, that when applied to the field by sprinkler irrigation, ponded on the ground surface, and produced run-off from the permitted area, resulting in a noncompliance with permit condition Schedule A.7.a. The irrigation process is contracted to a 3rd party through a farm lease. The day of the run-off event the water was not turned off by the contractor. As corrective actions to this event Boise Cascade is modifying the farm lease scope of work to remove the water application burden from the contractor putting this management process back on the facility.

Upon discovery of the run-off, the operators immediately shut off the water, bermed off the ditch, and pumped approximately 12,000 gallons of water from the ditch. Water from the ditch was discharged to the Lined Pond/Oil Water Separator. Approximately 8,000 gallons of the recovered water was process water applied to the West AR and the remainder was stormwater and groundwater. The process water is tested monthly for COD, TKN, TDS, As, Co, Na, SAR. The test results for September and October can be provided upon request. The field irrigation has been stopped for the season.

The facility considered removing soil from the ditch where process water had run-off to ensure no contaminants from the process water remained. However, after further review of the area it was determined doing this would cause significant damage to the heavily vegetated ditch and surrounding area, potentially increasing soil erosion and impacting stormwater quality within that ditch.

Please contact me at 541-437-1652, or Jessica Knight at 541-437-2207 with questions.

Statement of Certification: *I hereby certify that the information contained herein is true and correct to the best of my knowledge and belief.*

Dale Treib

Name of Designated Responsible Official

Signature

Production Manager

Title of Responsible Official

Date

10/16/23

Attachment: SWPCP Appendix II.d. with run-off path identified

cc: via email

J. Knight, D. Treib, J. Hafer, R. Smith, T. Riecke

M. Cruse, ODEQ

SWPCP Appendix II.d - DA6_DA7 AR Field Details
 Elgin Complex NPDES 1200-Z
 Updated 4/6/22

