PUBLIC NOTICE

Date 6/20/2024

DEQ Requests Comments on Proposed Water Quality Permit Renewal for Kronospan La Grande LLC

HOW TO PROVIDE PUBLIC COMMENT

Facility name: Kronospan La Grande LLC
Permit type: Industrial WPCF
Comments due by: Thursday, July 25, 2024 at 5 p.m.

Send written comments to:

By mail: Permit Coordinator, Oregon DEQ
800 SE Emigrant Ave., Ste 330 Pendleton OR 97801

By email: Water.PermitER@deq.oregon.gov

The Oregon Department of Environmental Quality invites the public to provide written comments on Kronospan La Grande LLC, formerly known as Woodgrain Millworks, Inc. Island City Particleboard proposed water quality permit, known officially as a Water Pollution Control Facilities permit.

Summary

This permit allows Kronospan La Grande LLC (Kronospan La Grande) to operate an industrial wastewater treatment facility consisting of effluent lagoons and a land application system in accordance with a DEQ-approved Operations, Monitoring & Management Plan in Union County. Part of the review process is an opportunity for public comment, based on the application and other DEQ information. Following DEQ's initial reissuance of this permit on January 29, 2024, the permittee requested a hearing contesting the conditions within the WPCF permit. DEQ and Woodgrain Millworks Inc. engaged in subsequent settlement negotiations. During the appeal process, the permittee requested an ownership transfer. DEQ received the transfer request on June 18, 2024. The permit and fact sheet have been updated to reflect that the permit has transferred from Woodgrain Millworks, Inc. Island City Particleboard to Kronospan La Grande LLC.As a result of those negotiations DEQ is reissuing the permit. Subject to public review and comment, DEQ plans to issue the permit.

About the facility

The facility provides treatment and disposal of stormwater and industrial wastewater consisting of non-contact cooling water, boiler blowdown and fire system flush water. It is located at 62621 Hwy 82 in Island City, Oregon. The permit does not allow any discharges to waterways.

What types of pollutants does the permit regulate?

The permit does not have effluent limits for wastewater discharge to surface waters but has effluent limits for protection of groundwater. The permit regulates pollutants typically associated with industrial wastewater. Industrial wastewater contains nitrogen compounds. Although nitrogen is a plant nutrient, nitrate is harmful to infants above a certain concentration. The proposed permit prohibits discharge to waters of the state, requires discharge meet pH and pond freeboard limits, requires spill reporting, and requires the facility to have a DEQ-approved Operations, Monitoring Management Plan.

Translation or other formats

Español | □ □ 어 | 繁體中文 | Русский | Tiếng Việt | العربية
800-452-4011 | TTY: 711 | deqinfo@deq.oregon.gov

State of Oregon Department of Environmental Quality

Would the draft permit change the amount of pollution the facility is allowed to release?

This is a renewal permit that has changed the pH limits to meet groundwater protection rules.

How does DEQ determine permit requirements?

DEQ evaluates types and amounts of pollutants and the water quality of the surface water or groundwater where the pollutants are proposed to be discharged to determine permit requirements. This ensures the proposed discharges will meet applicable statutes, rules, regulations and effluent guidelines of Oregon and the Clean Water Act.

DEQ relied solely on these documents and made no other discretionary decisions for the permit action.

How does DEQ monitor compliance with the permit requirements?

This permit will require the facility to monitor for pollutants discharged using approved monitoring practices and standards. DEQ reviews the facility's discharge monitoring reports to check for compliance with permit limits.

What happens next?

DEQ will hold a public hearing if DEQ receives a written request for a public hearing within 14 days of posting the public notice from at least 10 people or from an organization that represents at least 10 people.

DEQ will consider and respond to all comments received and may modify the proposed permit based on comments.

For more information

View information about this proposed permit issuance including the application, permit evaluation report and underlying documents online or by contacting DEQ's Water Quality Permit Coordinator, at water.permiter@deq.oregon.gov or 541-613-1125 to make an appointment to review the documents in person.

Non-discrimination statement

DEQ does not discriminate on the basis of race, color, national origin, disability, age or sex in administration of its programs or activities. Visit DEQ's Civil Rights and Environmental Justice page.

State of Oregon Department of Environmental Quality

WATER POLLUTION CONTROL FACILITIES PERMIT

Oregon Department of Environmental Quality
Eastern Region – Pendleton Office
800 SE Emigrant, #330
Pendleton, OR 97801
Telephone: 541-276-4063

Issued pursuant to ORS 468B.050

ISSUED TO:	SOURCES COVERED BY THIS PERMIT:		
	Type of Waste	**Outfall Number**	**Location**
Kronospan La Grande LLC 1 Kronospan Way Eastaboga, Alabama 36260	Industrial Wastewater Effluent and Stormwater (Infiltration/ Evaporation)	001	45.3474423, -118.026555
	Industrial Wastewater Effluent and Stormwater (Land Application)	002	Specified in a DEQ-approved OM&M Plan

FACILITY TYPE AND LOCATION:

Particleboard Manufacturing
Lagoon(s) and Land Application System
62621 Hwy 82
Island City, Oregon 97850
County: Union

RIVER BASIN INFORMATION:

WRD Basin: Grande Ronde

USGS Sub-Basin: Upper Grande Ronde
Nearest surface water body name:
Grande Ronde River, R.M. 150
LLID: 1169845460718

Issued in response to Application No. 948442 received September 23, 2022. This permit is issued based on the land use findings in the permit record.

	1-29-2024	3-1-2024
Mike Hiatt, Water Quality Permitting Manager Eastern Region	Issuance Date	Effective Date

PERMITTED ACTIVITIES

Until this permit expires or is modified or revoked, the permittee is authorized to construct, install, modify, or operate a wastewater collection, treatment, control, and disposal system in conformance the requirements of Oregon Administrative Rules – Chapter 340, Division 040, 041, 045 and 052, as well as the limitations, and conditions set forth in the attached schedules.

Unless specifically authorized by this permit, by another NPDES or WPCF permit, or by Oregon statute or administrative rule, any direct or indirect discharge of pollutants to waters of the state is prohibited.

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SCHEDULE A: WASTE DISCHARGE LIMITS

1. Permitted System

a. The Permittee is authorized to dispose of stormwater and industrial wastewater effluent consisting of non-contact cooling water, boiler blowdown, and fire system flush water in the Retention Overflow and Discharge (ROD) Pond, Process Water Pond (PWP), constructed wetland, and Cooling Pond in accordance with the conditions of this permit.

b. Upon DEQ-approval of an Operations, Monitoring and Management (OM&M) Plan, the permittee is approved to dispose of stormwater and industrial wastewater effluent from the Process Water Pond (PWP) at land application sites authorized in accordance with conditions of this permit.

c. In accordance with the terms and conditions of this permit, the Permittee is authorized to collect, store, treat and land apply industrial wastewater effluent and waste solids only from sources listed in this permit and/or the DEQ approved Operations, Monitoring and Management (OM&M) Plan.

2. Surface Water Protection

Direct discharge to navigable waters as defined in OAR Chapter 340 Division 045 Section 0010 (14) is prohibited.

3. Groundwater Protection

Any activity that has an adverse effect on existing or potential beneficial uses of groundwater is prohibited. All wastewater and wastewater solids must be managed and disposed in a manner that will prevent a violation of the Groundwater Quality Protection Rules (OAR Chapter 340, Division 40). If warranted, at any time, DEQ may evaluate the need for or require a full assessment of the facility's effect on groundwater quality.

4. Effluent Limits (Outfall 001)

ROD Pond, Cooling Pond and PWP limitations not to be exceeded:

Table A1: Pond Effluent Limits

Parameter	Limitation
Minimum Freeboard	1 foot
pH (Cooling Pond only)	Must be within the range of 6.5 to 8.5 SU for effluent discharged into the pond

5. Industrial Wastewater Effluent and Stormwater Land Application (Outfall 002)

The permittee is authorized to distribute industrial wastewater effluent commingled with stormwater for land application between April 1st and October 31st provided that the water is:

a. Managed in accordance with the DEQ-approved Operation, Monitoring and Management (OM&M) Plan.
b. Used in a manner and applied at a rate that does not adversely affect groundwater quality.
c. Applied at a rate and in accordance with site management practices that ensure continued agricultural, horticultural, or silvicultural production and does not adversely affect the productivity of the site.
d. Irrigated using sound irrigation practices to prevent:

i. Offsite surface runoff or subsurface drainage through drainage tile.
ii. Creation of odors, fly and mosquito breeding, or other nuisance conditions; and
iii. Be distributed as evenly as practicable within the land application area.
iv. Be conducted in a manner that prevents soil erosion, prolonged ponding on the ground surface (ponding that lasts up to 24 hours after irrigation has stopped will be allowed only if adverse or nuisance conditions do not occur as a result), or runoff from the site.

e. Not be conducted on non-crop or fallow land, except within 60 days prior to planting a crop.
f. Be limited to those lands described in the Land Use Compatibility Statements issued to the Permittee by Union County.
g. More monitoring may be recommended and approved in the OM&M Plan, in addition to the minimum monitoring requirements.
h. Prior to the application of any irrigation water at any wastewater land application site the Permittee must establish the water holding capacity (in/ft) for each of the top five feet of the soil column.
   i. The water holding capacity (field capacity) must be determined by a scientific method standard to the agricultural industry and approved by the Department. The method of determination must be described in the OM&M Plan.
   ii. The soil column water holding capacity for each approved application site must be listed in the Department approved Operation, Monitoring and Management (OM&M) plan.
   iii. Once approved by the Department, the water holding capacity for each of the top 5 feet of the soil column at each approved application site must not be changed or modified without the Department's written approval.

6. Land Application Site Authorization

The Permittee must obtain written site authorization from DEQ prior to application of industrial wastewater effluent at any beneficial reuse site or disposal site and follow the site-specific management conditions in the DEQ-issued site authorization.

7. Agronomic rates for Nutrient Loading

Crop and site-specific agronomic loading rates for nutrients will be approved by DEQ only after consideration of agronomic rates published in appropriate, region specific, fertilizer guides and proposed by the Permittee. DEQ may require adjustment to the allowable agronomic rates after review of annual reporting and to ensure adequate protection of public waters, including groundwater. The Operations, Monitoring and Management Plan must list the approved agronomic rates for each proposed crop.

8. Domestic (Sanitary) Wastes

This permit does not authorize treatment and disposal of sanitary wastes. Permittee is prohibited from mixing and/or blending sanitary waste with any authorized wastewater or waste solids.

SCHEDULE B: MINIMUM MONITORING AND REPORTING REQUIREMENTS

1. Reporting Requirements

The permittee must submit to DEQ monitoring results and reports as listed below.

Table B1: Reporting Requirements and Due Dates

Reporting Requirement	Frequency	Due Date (See Note a.)	Report Form (See Note b.)	Submit To:
Tables B2 – B10: ROD Pond, Cooling Pond, Process Water Pond, Industrial Wastewater Effluent, Supplemental Water, Soil Characterization, Soil Moisture, Crop, and Groundwater Monitoring - Operation, Monitoring & Management Plan Annual Report (See Schedule D)	Annually	March 1	Specified in Schedule B. Section 2 of this permit	As directed by DEQ Electronic copy to DEQ Pendleton Office
Operation, Monitoring & Management Plan for industrial wastewater effluent land application (See Schedules A & D)	One time	At least 90 days prior to land application of industrial wastewater effluent	One electronic copy in DEQ-approved format	Attached digital copy via electronic reporting as directed by DEQ

Notes:
a. For submittals that are provided to DEQ by mail, the postmarked date must not be later than the due date.
b. All reporting requirements are to be submitted in a DEQ approved format, unless otherwise specified in writing.

2. Monitoring and Reporting Protocols

a. **Paper Submissions.**

When submitting paper copies as required by table B1, the permittee must submit to DEQ the results of the monitoring in a paper format as specified below.

i. Until directed by DEQ all Discharge Monitoring Reports (DMRs) must be submitted in an approved paper format:

(A) The reporting period is the calendar year.

(B) The permittee must submit monitoring data and other information required by this permit for all compliance points by the date provided in Table B1 or as specified in writing by DEQ.

ii. Until directed by DEQ, the permittee must submit any required, Sanitary Sewer Overflow/Bypass Event Reports and other required information to DEQ.

iii. The permittee must sign and certify submittals of Discharge Monitoring Reports (DMRs), annual required reports, and other information in accordance with the requirements of Section D3 within Schedule F of this permit.

b. **Electronic Submissions.**

When submitting electronic copies as required by table B1, the permittee must submit to DEQ the results of monitoring in an electronic format as specified below.

i. When directed by DEQ, the permittee must submit monitoring results required by this permit via DEQ-approved web-based Electronic Discharge Monitoring Report (DMR) forms.

ii. The reporting period is the calendar year.

iii. The permittee must submit monitoring data and other information required by this permit for all compliance points by the date provided in Table B1 or as specified in writing by DEQ.

iv. When directed by DEQ, the permittee must submit electronic reports to DEQ via designated web-based reporting process.

c. **Implementation**

The Laboratory QLs (adjusted for any dilutions) for analyses performed to demonstrate compliance with permit limits or as part of effluent characterization, must be at or below the QLs specified in the permit unless one of the conditions below is met.

i. The monitoring result shows a detect above the laboratory reported QL.

ii. The monitoring result indicates non-detect at a DL which is less than the QL.

iii. Matrix effects are present that prevent the attainment of QLs and these matrix effects are demonstrated according to procedures described in EPA's "Solutions to Analytical Chemistry Problems with Clean Water Act Methods", March 2007. If using alternative methods and taking appropriate steps to eliminate matrix effects does not eliminate the matrix problems, DEQ may authorize in writing re-sampling or allow a higher QL to be reported. In the case of effluent characterization monitoring.

d. **Quality Assurance and Quality Control**

i. Quality Assurance Plan – The permittee must develop and implement a written Quality Assurance Plan that details the facility sampling procedures. This plan should include any equipment calibration and maintenance, analytical methods, quality control activities and laboratory data handling and reporting if the permittee conducts any of their own analytical work. The QA/QC program must conform to the requirements of 40 CFR 136.7.

ii. If QA/QC requirements are not met for any analysis, the permittee must re-analyze the sample. If the sample cannot be re-analyzed, the permittee must re-sample and analyze at the earliest opportunity. If the permittee is unable to collect a sample that meets QA/QC requirements, then the permittee must include the result in the discharge monitoring report (DMR) along with a notation (data qualifier). In addition, the permittee must explain how the sample does not meet QA/QC requirements. The permittee may not use the result that failed the QA/QC requirements in any calculation required by the permit unless authorized in writing by DEQ.

iii. Flow measurement, field measurement, and continuous monitoring devices - The permittee must:

(A) Establish verification and calibration frequency for each device or instrument in the quality assurance plan that conforms to the frequencies recommended by the manufacturer.

(B) Verify at least once per year that flow-monitoring devices are functioning properly according to manufacturer's recommendation. Calibrate as needed according to manufacturer's recommendations.

(C) Verify at least weekly that the continuous monitoring instruments are functioning properly according to manufacturer's recommendation unless the permittee demonstrates a longer period is sufficient and such longer period is approved by DEQ in writing.

e. **Reporting Sample Results**

i. The permittee must report the same number of significant digits as the permit limit for a given parameter.

3. Monitoring and Reporting Requirements

The Permittee must monitor the operation and efficiency of all treatment and disposal facilities in accordance with this permit and the Department-approved OM&M Plan, and any amendments to the plan approved in writing by the Department. Minimum monitoring must include the following items unless otherwise approved by DEQ in writing:

a. The permittee must monitor wastewater discharge into the ROD Pond in accordance with the following table:

Table B2: ROD Pond Monitoring Requirements

Item or Parameter	Units	Time Period	Minimum Frequency	Sample Type / Required Action See note b.	Report Statistic See note a.
Inspect pond dike and freeboard	n/a	Year-round	Weekly	Record	Record Observation
pH	Standard Units (SU)	Year-round	Monthly	Grab	Daily Value Monthly Maximum Monthly Minimum
Total Dissolved Solids (see note c.)	mg/L	Year-round	Monthly	Grab	Monthly Average
Manganese (Mn)	mg/L	Year-round	Quarterly	Grab	Quarterly Average
Sodium, (Na)	mg/L	Year-round	Quarterly	Grab	Quarterly Average
Solids removed	lbs	Upon Removal	Each occurrence	Estimate	Total volume removed

Notes:

a. When submitting DMRs electronically, all data used to determine summary statistics shall be submitted in a DEQ approved format unless otherwise directed by DEQ. If submitting paper DMRs, all data collected shall be reported on each DMR.

b. In the event of equipment failure or loss, the permittee must notify DEQ and repair or replace effected equipment to minimize interruption of data collection. If the equipment cannot be immediately repaired or replaced, the permittee must perform grab measurements daily.

c. Electrical conductivity (EC) may be substituted for total dissolved solids (TDS), if the permittee submits a correlation between TDS and EC with actual pond data and it is approved in writing by the Department.

b. The permittee must monitor wastewater at discharge into the Cooling Pond and visually inspect the pond in in accordance with the following table:

Table B3: Cooling Water Pond Monitoring Requirements

Item or Parameter	Units	Time Period	Minimum Frequency	Sample Type/ Required Action See note b.	Report Statistic See note a.
Inspect pond dike and freeboard	n/a	Year-round	Weekly	Record	Record Observation
pH (See note c.)	Standard Units (SU)	May 1 – October 31	2/week	Grab	Daily Value Monthly Maximum Monthly Minimum
		November 1 – April 30	2/month	Grab	Daily Value Monthly Maximum Monthly Minimum
Total Dissolved Solids (TDS)	mg/L	Year-round	Monthly	Grab	Monthly Average
Total Kjeldahl Nitrogen (TKN)	mg/L	Year-round when irrigating	Monthly	Grab	Monthly Average
Nitrate (NO3) Plus Nitrite (NO2) NO_3+NO_2-N Nitrogen	mg/L	Year-round when irrigating	Monthly	Grab	Monthly Average
Calcium (Ca)	mg/L	Year-round	Quarterly	Grab	Quarterly Average
Iron (Fe)	mg/L	Year-round	Quarterly	Grab	Quarterly Average
Magnesium (Mg)	mg/L	Year-round	Quarterly	Grab	Quarterly Average
Total Phosphorus (P)	mg/L	Year-round	Quarterly	Grab	Quarterly Average
Solids removed	cubic yards of dry weight volume	Upon removal	Each occurrence	Estimate	Record date Estimated volume removed Final destination of solids

Item or Parameter	Units	Time Period	Minimum Frequency	Sample Type/ Required Action See note b.	Report Statistic See note a.

Notes:
a. When submitting DMRs electronically, all data used to determine summary statistics shall be submitted in a DEQ approved format as an attachment unless otherwise directed by DEQ. If submitting paper DMRs, all data collected shall be reported on each DMR.
b. In the event of equipment failure or loss, the permittee must notify DEQ and deploy new equipment to minimize interruption of data collection. If new equipment cannot be immediately deployed, the permittee must perform grab measurements. If the failure or loss is for continuous temperature monitoring equipment, the permittee must perform grab measurements daily between 2 PM and 4 PM until continuous monitoring equipment is redeployed.
c. After such time that the permittee has completed two full years of monitoring and met the effluent limits for pH specified in Schedule A, the permittee can submit a request for a reduction in monitoring in writing for DEQ consideration.

c. The permittee must monitor wastewater at discharge into the Process Water Pond and visually inspect the pond in in accordance with the following table:

Table B4: Process Water Pond Monitoring Requirements

Item or Parameter	Units	Time Period	Minimum Frequency	Sample Type/ Required Action	Report Statistic See note a.
Inspect pond dike and freeboard	n/a	Year-round	Weekly	Record	Record Observation
pH (See note b.)	Standard Units (SU)	May 1 – October 31	2/week	Grab	Daily Value Monthly Maximum Monthly Minimum
		November 1 – April 30	2/month	Grab	Daily Value Monthly Maximum Monthly Minimum
Total Dissolved Solids (TDS)	mg/L	Year-round	Monthly when irrigating	Grab	Monthly Average
Total Kjeldahl Nitrogen (TKN)	mg/L	Year-round when irrigating	Monthly when irrigating	Grab	Monthly Average
Nitrate (NO3) Plus Nitrite (NO2) NO_3+NO_2-N Nitrogen	mg/L	Year-round when irrigating	Monthly when irrigating	Grab	Monthly Average

Item or Parameter	Units	Time Period	Minimum Frequency	Sample Type/ Required Action	Report Statistic See note a.
Solids removed	cubic yards of dry weight volume	Upon Removal	Each occurrence	Estimate	Total volume removed

Notes:
a. When submitting DMRs electronically, all data used to determine summary statistics shall be submitted in a DEQ approved format as an attachment unless otherwise directed by DEQ. If submitting paper DMRs, all data collected shall be reported on each DMR.
b. After such time that the permittee has completed two full years of monitoring and met effluent limits for pH specified in Schedule A, the permittee can submit a request for a reduction in monitoring in writing for DEQ consideration.

4. Land Application Monitoring Requirements: Outfall 002

a. The permittee must monitor industrial wastewater effluent at the land application site (Outfall 002) as listed below. The samples must be representative of the industrial wastewater effluent discharged at any location identified in the DEQ-approved Operation, Monitoring and Management Plan (OM&M Plan).

Table B5: Industrial Wastewater Effluent Land Application System Water Monitoring

Item or Parameter	Time Period	Minimum Frequency	Sample Type/ Required Action	Report
Effluent flow (MGD) from each pond	When irrigating	Daily	Measurement and calculation	Annual Report
Quantity irrigated (inches/acre)	When irrigating	Daily	Calculation	Annual Report
Total nitrogen (See note a) loading rate from industrial wastewater effluent water (lb/acre-year)	When irrigating	Monthly	Calculation	Annual Report
Total dissolved solids (mg/L)	When irrigating	Monthly	Grab	Annual report
BOD loading (lbs/acre/day)	When irrigating	Monthly	Grab/calculation	Annual report
Sodium adsorption ratio	When irrigating	Monthly	Grab/calculation	Annual report

Note:
a. Total nitrogen = sum of TKN plus NO2-N plus NO3-N from each pond used for irrigation.

b. The permittee must monitor land applied supplemental use water for Outfall 002 as listed below.

Table B6: Supplemental Water Land Application System Monitoring

Item or Parameter	Time Period	Minimum Frequency	Sample Type/ Required Action	Report
Total flow supplemental irrigation water (MGD)	When irrigating	Daily	Measurement	Annual Report
Quantity supplemental water irrigated (inches/acre)	When irrigating	Daily	Calculation	Annual Report
Total nitrogen loading rate (lb/acre) (See note a.)	When irrigating	Monthly	Calculation	Annual Report
Total Kjeldahl Nitrogen (TKN) (mg/L)	When irrigating	Monthly	Grab	Annual Report
Total nitrogen loading rate from supplemental fertilizer sources (lb/acre) (See note a.)	Year round	Monthly	Calculation	Annual Report
Total dissolved solids (mg/L)	When irrigating	Monthly	Grab	Annual Report
BOD loading (lbs/acre/day)	When irrigating	Monthly	Grab/calculation	Annual Report
Sodium adsorption ratio (SAR)	When irrigating	Monthly	Grab/calculation	Annual Report
Note: a. Total nitrogen = sum of TKN plus NO_2-N plus NO_3-N.				

5. Soil Characterization Monitoring

a. When land applying industrial wastewater effluent, at each approved application site the Permittee must collect representative soil samples from each foot increment of the rooting depth identified in the DEQ-approved OM&M Plan of the soil column and analyze each, by accepted laboratory methods, for the following parameters:

Table B7: Soil Characterization

Item or Parameter Units	Minimum Frequency (See note b.)	Sample Type/Action
Nitrate-Nitrogen (lbs./ac)	2/year	In Accordance with OM&M Plan
Ammonium-Nitrogen (lbs./ac)	2/year	In Accordance with OM&M Plan
EC of saturated extract (uS/cm)	2/year	In Accordance with OM&M Plan
pH (SU) (see note a.)	2/year	In Accordance with OM&M Plan
Notes: a. pH is required in the top foot of soil at each site only.		

Item or Parameter Units	Minimum Frequency (See note b.)	Sample Type/Action
b. Twice per year -- once in spring (prior to irrigation or addition of fertilizer) and once at the end of the growing season in accordance with sampling procedures in the OM&M plan.		

b. The Permittee must monitor soil moisture at each land application site by an accepted soil moisture monitoring method as defined in the approved OM&M Plan when land applying industrial wastewater effluent. The permittee must review soil moisture data monthly and submit collected data with the annual report.

Table B8: Soil Moisture Monitoring

Item or Parameter, Units	Minimum Frequency	Sample Type/Action
Water Holding Capacity, inches of water/ft	Annually (see note a.)	Record value
Soil Moisture, inches of water/ft	Weekly	Record amounts, Totalize monthly
Notes: a. See Schedule A, Condition 5(h).		

6. Crop Monitoring

The Permittee must monitor and record crop information, for each authorized application site, when land applying industrial wastewater effluent, as follows:

Table B9: Crop Monitoring

Item or Parameter	Minimum Frequency	Sample Type/Action
Crops grown	When planted and harvested	Record dates
Crop Tissue Total Nitrogen (%) (see note a.)	At harvest	Calculation/Record amounts
Crop Nitrogen removal (see note a.)	At harvest	Calculation
Crop Yield (lb/ac or tons/ac) (see note a.)	At harvest	Record amounts
Note: a. Crop Nitrogen removal is to be calculated based on % Total N from crop tissue sampling and recorded crop yield. Tissue testing, nitrogen removal, and yield reporting is not required for cover crops that are tilled-under. The associated contribution of nitrogen mineralization for cover crops or crop residues being tilled under after soil testing must be accounted for in the nutrient loading for the next crop as described in the OM&M Plan.		

7. Groundwater Monitoring

Groundwater monitoring must be performed in accordance with the Department-approved Groundwater Monitoring Plan. The Groundwater Monitoring Plan may be attached to the OM&M Plan.

a. Groundwater Action Requirements

i. If groundwater monitoring data indicate a significant increase (increase or decrease for pH) in the value of a parameter monitored, the Permittee must immediately resample and notify the Department within fifteen (15) days. A significant increase occurs when the value exceeds the upper tolerance limit (UTL) for the well. The UTL is calculated based on the distribution of the data as outlined *in Statistical Analysis of Ground-Water Monitoring Data*

at RCRA Facilities, Interim Final Guidance (EPA 1989) and *Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities, Addendum to Interim Final Guidance* (EPA 1992). Immediately means as soon as practicable,

ii. If the re-sampling confirms a significant increase (increase or decrease for pH) in the value of a parameter monitored, the Permittee must:
    i. Report the results to the Department within ten (10) days of receipt of the laboratory data, but in no case longer than sixty (60) days from the date of resampling; and,
    ii. Prepare and submit to the Department within thirty (30) days a plan for developing a preliminary assessment, unless another time schedule is approved in writing by the Department; or,
    iii. Follow an alternative plan that has been approved in writing by the Department.

b. The Permittee must monitor groundwater in accordance with the approved Groundwater Monitoring Plan and any amendments to the plan approved by the Department in writing. Minimum groundwater monitoring must include the following parameters:

Table B10: Groundwater Monitoring

Item or Parameter	Minimum Frequency	Type of Sample
pH (field measurement)	Quarterly	Grab
Nitrate Nitrogen	Quarterly	Grab
Chloride	Quarterly	Grab
Sulfate	Quarterly	Grab
TDS	Quarterly	Grab
Specific Conductivity	Quarterly	Grab
Temperature	Quarterly	Grab
Static Water Level	Quarterly	Measurement

SCHEDULE C: COMPLIANCE SCHEDULE

1. Compliance Schedule for Final Groundwater Concentration Limits

a. The permittee must submit a Water Quality Analysis Report (WQAR) on or before 12 months after the effective date of this permit. The WQAR must include:
   i. A conceptual model for revised groundwater conditions at the site including groundwater flow, fate, and transport of all discharges at the site.
   ii. Evaluate all contaminants of concern.
   iii. Propose concentration limits for appropriate contaminants of concern at the facility.
   iv. The WQAR must be signed and sealed by an Oregon registered hydrogeologist.

b. Upon DEQ approval of the WQAR, the permit will be modified to incorporate final groundwater concentration limits to Schedule A.

2. Responsibility to Meet Compliance Dates

The permittee is expected to meet the compliance dates which have been established in this schedule. Either prior to or no later than 14 days following any lapsed compliance date, the permittee must submit to DEQ a notice of compliance or noncompliance with the established schedule. The Director or an authorized representative may revise a schedule of compliance if determined good and valid cause resulting from events over which the permittee has little or no control.

SCHEDULE D: SPECIAL CONDITIONS

1. Operation, Monitoring and Management Plan (OM&M)

Prior to land application with industrial wastewater effluent, the permittee must have a DEQ-approved Operations, Monitoring and Management (OM&M) Plan that describes the operation and management of the land application system, including satisfactorily addressing all DEQ-comments on the plan. At a minimum the plan must include the following:

a. Statement that the current plan supersedes all previous plans;
b. Name and contact information of the person(s) whose primary responsibilities are to ensure the continuous performance of the collection, storage/treatment, and land application and/or disposal system(s) in accordance with the conditions of the WPCF permit.
c. Treatment system, including flow diagram, description, and expected waste characteristics:
    i. Treatment system maintenance plan.
    ii. How the facility will address aging infrastructure and a preventative maintenance schedule and tracking program to prevent leaks and unauthorized discharges.
d. Identify all proposed beneficial and disposal uses of industrial wastewater effluent and estimated volumes for each use.
    i. Identify the industrial wastewater effluent characteristics, quality, and total volume produced.
e. Identify all proposed beneficial and disposal of wastewater solids and waste process solids and estimated quantities for each.
    i. Waste solids management plan is to include storage, waste characteristics, testing, transport, and site management activities.
f. Land application site(s) description including:
    i. Map and list of all land application sites and associate acreage, legal description, zoned land use, and site ownership.
    ii. Site map detailing setbacks, and distances to wells, surface water and the nearest developed property from all boundaries of the irrigation site.
    iii. Up-to-date system capacity assessment (to include nutrient balance and hydraulic capacity assessments).
    iv. Description and diagram of the irrigation system, application methods and rates, location, and type of flow monitoring devices for each field and shut off procedures.
        1. Irrigation system maintenance plan.
        2. Site management practices including the timing of irrigation, methods used to mitigate potential aerosol drift.
        3. Public access control and how the public and personnel will be notified of industrial wastewater effluent irrigation.
g. Characterization of the soils and crops or vegetation grown at the land application site including agronomic rates for water and nutrient uptake.
    i. List of all crops to be grown on the land application management units along with their agronomic rate and associated management practices (including cover crop and forage crop management practices), yield expectations and crude protein goals – with identification of the scientific sources used for their determination. Crops are to be identified as annual, overwinter, cover, multi-season or last year multi-season. Yield expectations are to be clearly identified; for example, but not limited to mechanical harvest with stubble remaining; seed production with hay removal, etc.
    ii. How agronomic rates are to be proposed and calculated.
    iii. Description of how agronomic rates and/or management practices will be adjusted for environmental protection based on collected data results (soil test and harvest data, monitoring well results).

iv. A statistical review of past crop performance and nitrogen removal to support current agronomic rates, adjusting as necessary.
v. Crop irrigation requirements and scheduling/management practices to prevent irrigated waters from leaving the rooting zone – along with Maximum Allowed Deficit (MAD) parameters and irrigation efficiency for hydraulic and nutrient loading.
vi. Soil moisture monitoring methodology/protocols along with statistical evaluation and validation supporting the number of soil moisture monitoring points being used per field and to ensure that data accurately represents field conditions.
vii. Biomass sampling plan.
viii. Monitoring, sampling, and reporting procedures, QA/QC, and sampling location points used to demonstrate compliance with the permit.

h. Completed Land Use Compatibility Statement (LUCS).
i. Completed Oregon Water Resources industrial water reuse registration form.
j. Contingency procedures and public notification, including spill prevention and response.
k. A list of safety data sheets for any chemical additives which would enter the effluent or waste solids beneficial use or disposal land application stream.

2. Emergency Response and Public Notification Plan

The permittee must develop an Emergency Response and Public Notification Plan ("plan") or ensure the facility's existing plan is current and accurate, per Schedule F, Section B, and Condition 8 within 6 months of permit effective date. The permittee must update the plan annually to ensure all information contained in the plan, including telephone and email contact information for applicable public agencies, is current and accurate. An updated copy of the plan must be kept on file at the facility for DEQ review. The latest plan revision date must be listed on the plan cover along with the reviewer's initials or signature.

3. Groundwater

a. Groundwater Monitoring Plan

i. The permittee must prepare and submit an updated groundwater monitoring plan to the Department that is specific to the permittee's site before any modifications are incorporated. The permittee must implement all conditions of the final DEQ approved groundwater monitoring plan.
ii. The Groundwater Monitoring Plan will include but not be limited to: Sampling and reporting frequency, sampling method, criteria for determining sample is representative of target aquifer, target analytes and analytical method, field parameters and instrument calibration, sample collection quality assurance and quality control, purge water management, well construction, well development, and well placement.

b. Groundwater Well Management

i. The permittee must protect and maintain each groundwater monitoring well such that representative samples of the targeted aquafer can be collected.
ii. All monitoring well abandonment, replacement, and installation must be conducted in compliance with the Oregon Water Resources Department Rules OAR Chapter 690, Division 240 and with the Department's Guidelines for Groundwater Monitoring Well Drilling, Construction, and Decommissioning. All monitoring well repair, abandonment, replacement, and installation must be documented in a report prepared by a State of Oregon registered geologist.
iii. If a monitoring well becomes damaged or inoperable, the permittee shall notify the Department in writing within 14 days of discovery. The written report shall describe what has occurred, the remedial measures that have been or will be taken to correct the

problem, and the measures taken to prevent its recurrence. The Department may require the replacement of inoperable monitoring wells.

iv. New or replacement monitoring well placement or design must be approved by the Department prior to installation. Well logs and a well completion report must be submitted to the Department within 30 days of installation of the well. The report must include a survey drawing showing the location of all monitoring wells, adjacent structures, and water bodies.

v. An abandonment plan for existing wells deemed unsuitable for groundwater monitoring must be submitted for Department approval prior to abandonment.

SCHEDULE F: WPCF GENERAL CONDITIONS

SCHEDULE F

WPCF GENERAL CONDITIONS – INDUSTRIAL FACILITIES

SECTION A. STANDARD CONDITIONS

Duty to Comply with Permit

1. The permittee must comply with all conditions of this permit. Failure to comply with any permit condition is a violation of Oregon Revised Statutes (ORS) 468B.025 and grounds for an enforcement action. Failure to comply is also grounds for the Department to modify, revoke, or deny renewal of a permit.

Property Rights and Other Legal Requirements

2. Issuance of this permit does not convey any property rights of any sort, or any exclusive privilege, or authorize any injury to persons or property or invasion of any other rights, or any infringement of federal, tribal, state, or local laws or regulations.

Liability

3. The Department of Environmental Quality or its officers, agents, or employees may not sustain any liability on account of the issuance of this permit or on account of the construction or maintenance of facilities or systems because of this permit.

Permit Actions

4. After notice by the Department, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including but not limited to the following:

a. Violation of any term or condition of this permit, any applicable rule or statute, or any order of the Commission;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts.

Transfer of Permit

5. This permit may not be transferred to a third party without prior written approval from the Department. The Department may approve transfers where the transferee acquires a property interest in the permitted activity and agrees in writing to fully comply with all the terms and conditions of this permit and the rules of the Commission. A transfer application and filing fee must be submitted to the Department.

Permit Fees

6. The permittee must pay the fees required by Oregon Administrative Rules.

SECTION B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

Proper Operation and Maintenance

1. At all times the permittee must maintain in good working order and properly operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to comply with the terms and conditions of this permit.

Standard Operation and Maintenance

2. All waste collection, control, treatment, and disposal facilities or systems must be operated in a manner consistent with the following:

a. At all times, all facilities or systems must be operated as efficiently as possible in a manner that will prevent discharges, health hazards, and nuisance conditions.

b. All screenings, grit, and sludge must be disposed of in a manner approved by the Department to prevent any pollutant from the materials from reaching waters of the state, creating a public health hazard, or causing a nuisance condition.

c. Bypassing untreated waste is generally prohibited. Bypassing may not occur without prior written permission from the Department except where unavoidable to prevent loss of life, personal injury, or severe property damage.

Noncompliance and Notification Procedures

3. If the permittee is unable to comply with conditions of this permit because of surfacing sewage; a breakdown of equipment, facilities, or systems; an accident caused by human error or negligence; or any other cause such as an act of nature, the permittee must:

a. Immediately take action to stop, contain, and clean up the unauthorized discharges and correct the problem.

b. Immediately notify the Department's Regional office so that an investigation can be made to evaluate the impact and the corrective actions taken, and to determine any additional action that must be taken.

c. Within 5 days of the time the permittee becomes aware of the circumstances, the permittee must submit to the Department a detailed written report describing the breakdown, the actual quantity and quality of waste discharged, corrective action taken, steps taken to prevent a recurrence, and any other pertinent information.

Compliance with these requirements does not relieve the permittee from responsibility to maintain continuous compliance with the conditions of this permit or liability for failure to comply.

Wastewater System Personnel

4. The permittee must provide an adequate operating staff that is duly qualified to carry out the operation, maintenance, and monitoring requirements to assure continuous compliance with the conditions of this permit.

Public Notification of Effluent Violation

5. If effluent limitations specified in this permit are exceeded or an overflow occurs that threatens public health, the permittee must take such steps as are necessary to alert the public, health agencies and other affected entitles (e.g., public water systems) about the extent and nature of the discharge in accordance with the notification procedures developed in accordance with General Condition B.6. Such steps may include, but are not limited to, posting of the river at access points and other places, news releases, and paid announcements on radio and television.

Emergency Response and Public Notification Plan

6. The permittee must develop and implement an emergency response and public notification plan that identifies measures to protect public health from bypasses or upsets that may endanger public health. At a minimum the plan must include mechanisms to:

a. Ensure that the permittee is aware (to the greatest extent possible) of such events;

b. Ensure notification of appropriate personnel and ensure that they are immediately dispatched for investigation and response;

c. Ensure immediate notification to the public, health agencies, and other affected entities (including public water systems). The response plan must identify the public health and other officials who will receive immediate notification;
d. Ensure that appropriate personnel are aware of and follow the plan and are appropriately trained;
e. Provide emergency operations: and
f. Ensure that DEQ is notified of the public notification steps taken.

SECTION C. MONITORING AND RECORDS

Inspection and Entry

1. The permittee must at all reasonable times allow authorized representatives of the Department to:

a. Enter upon the permittee's premises where a waste source or disposal system is located or where any records are required to be kept under the terms and conditions of this permit;
b. Have access to and copy any records required by this permit;
c. Inspect any treatment or disposal system, practices, operations, monitoring equipment, or monitoring method regulated or required by this permit; or
d. Sample or monitor any substances or permit parameters at any location at reasonable times for the purpose of assuring permit compliance or as otherwise authorized by state law.

Averaging of Measurements

2. Calculations of averages of measurements required for all parameters except bacteria must use an arithmetic mean; bacteria must be averaged as specified in the permit.

Monitoring Procedures

3. Monitoring must be conducted according to test procedures specified in the most recent edition of **Standard Methods for the Examination of Water and Wastewater**, unless other test procedures have been approved in writing by the Department and specified in this permit.

Retention of Records

4. The permittee must retain records of all monitoring and maintenance information, including all calibrations, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report or application. The Department may extend this period at any time.

SECTION D. REPORTING REQUIREMENTS

Plan Submittal

1. Pursuant to Oregon Revised Statute 468B.055, unless specifically exempted by rule, construction, installation, or modification of disposal systems, treatment works, or sewerage systems may not commence until plans and specifications are submitted to and approved in writing by the Department. All construction, installation, or modification shall be in strict conformance with the Department's written approval of the plans.

Change in Discharge

2. Whenever a facility expansion, production increase, or process modification is expected to result in a change in the character of pollutants to be discharged or in a new or increased discharge that will exceed the conditions of this permit, a new application must be submitted together with the necessary reports, plans, and specifications for the proposed changes. A change may not be made until plans have been approved and a new permit or permit modification has been issued.

Signatory Requirements

3. All applications, reports, or information submitted to the Department must be signed and certified by the official applicant of record (owner) or authorized designee.

Twenty-Four Hour Reporting

4. The permittee must report any noncompliance that may endanger health or the environment. Any information must be provided orally (by telephone) within 24 hours from the time the permittee becomes aware of the circumstances, unless a shorter time is specified in the permit. During normal business hours, the Department's Regional office must be called. Outside of normal business hours, the Department must be contacted at 1-800-452-0311 (Oregon Emergency Response System).

The following must be included as information that must be reported within 24 hours under this paragraph:

a. Any unanticipated bypass that exceeds any effluent limitation in this permit;
b. Any upset that exceeds any effluent limitation in this permit;
c. Violation of maximum daily discharge limitation for any of the pollutants listed by the Department in this permit; and
d. Any noncompliance that may endanger human health or the environment.

A written submission must also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission must contain:

e. A description of noncompliance and its cause;
f. The period of noncompliance, including exact dates and times;
g. The estimated time noncompliance is expected to continue if it has not been corrected;
h. Steps taken or planned to reduce, eliminate and prevent reoccurrence of the noncompliance; and
i. Public notification steps taken, pursuant to General Condition B.6.

The Department may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

SECTION E. DEFINITIONS

1. *BOD or BOD_5* means five-day biochemical oxygen demand.
2. *CBOD or $CBOD_5$* means five-day carbonaceous biochemical oxygen demand.
3. *TSS* means total suspended solids.
4. *Bacteria* means but is not limited to fecal coliform bacteria, total coliform bacteria, *Escherichia coli* (*E. coli*) bacteria, and *Enterococcus* bacteria.
5. *FC* means fecal coliform bacteria.
6. *Total residual chlorine* means combined chlorine forms plus free residual chlorine
7. *Technology based permit effluent limitations* means technology-based treatment requirements as defined in 40 CFR § 125.3, and concentration and mass load effluent limitations that are based on minimum design criteria specified in OAR 340-041.
8. *mg/l* means milligrams per liter.
9. *µg/l* means microgram per liter.
10. *kg* means kilograms.
11. *m^3/d* means cubic meters per day.
12. *MGD* means million gallons per day.
13. *Average monthly effluent limitation* as defined at 40 CFR § 122.2 means the highest allowable average of daily discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.
14. *Average weekly effluent limitation* as defined at 40 CFR § 122.2 means the highest allowable average of daily discharges over a calendar week, calculated as the sum of all daily discharges measured during a calendar week divided by the number of daily discharges measured during that week.

15. *Daily discharge* as defined at 40 CFR § 122.2 means the discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the daily discharge must be calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurement, the daily discharge must be calculated as the average measurement of the pollutant over the day.

16. *24-hour composite sample* means a combination of at least six discrete sample aliquots of at least 100 milliliters, collected at periodic intervals from the same location, during the operating hours of the facility over a 24-hour period. Four (rather than six) aliquots should be collected for volatile organics analyses. The composite must be flow or time proportional, whichever is more appropriate. The sample aliquots must be collected and stored in accordance with procedures prescribed in the most recent edition of *Standard Methods for the Examination of Water and Wastewater*.

17. *Grab sample* means an individual discrete sample collected over a period of time not to exceed 15 minutes.

18. *Quarter* means January through March, April through June, July through September, or October through December.

19. *Month* means calendar month.

20. *Week* means a calendar week of Sunday through Saturday.

State of Oregon
Department of
Environmental
Quality

Water Pollution Control Facilities
Permit Renewal Fact Sheet
Kronospan La Grande

Permittee	Kronospan La Grande LLC 1 Kronospan Way Eastaboga, Alabama 36260
Existing Permit Information	File Number: 9501 Permit Number: 103044 Expiration Date: 12-31-2033
Permittee Contact	Morgan Olson, Plant Manager (541) 962-2100, M.Olson@kronospanusa.com 62621 Hwy 82 Island City, Oregon 97850
Facility Name & Location	Facility Name: Kronospan La Grande Address: 62621 Hwy 82 Island City, Oregon 97850 Lat: 45.2000 Lat: -118.0200 County: Union
LLID:	LLID: 1169845460718
Receiving Stream/Basin:	Nearest stream: Grande Ronde River at mile 150 Sub Basin Name: Upper Grande Ronde WRD Basin Name: Grande Ronde
Proposed Action:	Permit Renewal Application Number: 948442 Date Application Received: September 23, 2022
Source Category:	WPCF Industrial
Sources Covered:	Process Wastewater (Industrial Wastewater Effluent)
Permit Type:	WPCF-IW-B20
Permit Writer	Anna Morgan-Hayes 541-246-4562 Date Prepared: 9-25-2023

WPCF Permit Renewal Fact Sheet
Kronospan La Grande

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WPCF Permit Renewal Fact Sheet
Kronospan La Grande

1. Introduction

As required by Oregon Administrative Rule 340-045-0037, this fact sheet describes the basis and methodology used in developing the permit. The permit is divided into several sections:

Schedule A – Waste discharge limitations
Schedule B – Minimum monitoring and report requirements
Schedule C – Compliance conditions and schedules
Schedule D – Special conditions
Schedule F – General conditions

This permit was transferred from Boise Cascade to Woodgrain Millworks, Inc. on December 10, 2018. A permit renewal application (No. 948442) was received on September 23, 2022, and the permit was administratively extended.

Following DEQ's initial reissuance of this permit on January 29, 2024, the permittee requested a hearing contesting the conditions within the WPCF permit. DEQ and Woodgrain Millworks Inc. engaged in subsequent settlement discussions. During the appeal process, the permittee requested an ownership transfer effective May 22nd, 2024, and signed by both legal contacts from the companies. DEQ received the transfer request on June 18, 2024. The permit and fact sheet have been updated to reflect that the permit has transferred from Woodgrain Millworks, Inc. Island City Particleboard to Kronospan La Grande LLC. As a result of the aforementioned appeal discussions, DEQ is reissuing the permit.

A summary of the major changes to the permit are listed below:

Effluent monitoring of lagoon pH will be required more frequently on a seasonal schedule, to better track and understand pH fluctuations. In lieu of flow monitoring, quarterly monitoring for Calcium (Ca), Iron (Fe), Magnesium (Mg), and Total Phosphorus (P) are required in the Cooling Water Pond to assess impacts to groundwater from the lagoon. Similarly, quarterly monitoring for Manganese (Mn) and Sodium (Na) are required in the ROD Pond to assess impacts to groundwater from the lagoon. During permit renewal, DEQ determined that current monitoring is insufficient to determine adequate groundwater protections. Additionally, the pH limit has been modified in accordance with Division 340-040-0020 so that groundwater is sufficiently protected from potential seepage from the facility's lagoons. The facility will be required to submit an Operations, Maintenance & Management Plan (OM&M) detailing the industrial wastewater effluent land application system should land application of effluent be utilized. Industrial wastewater effluent monitoring, land application, soil, crop monitoring, and groundwater monitoring are required by the permit. Monitoring locations have been specified within the permit.

A compliance schedule has been added to the permit to require that the permittee will conduct a Water Quality Analysis Report (WQAR) to determine groundwater concentration limits.

2. Facility Description

2.1 Wastewater Facility

Kronospan La Grande LLC (Kronospan La Grande) operates a particleboard manufacturing plant on approximately 67 acres on a heavy industrial zoned site adjacent to Highway 84. The plant was constructed in 1967 and includes two production lines with supporting buildings and operational centers. Green and dry furnish (wood fiber) is trucked to the plant from area wood products facilities where it is off-loaded at truck ramps and moved by conveyer and forced air to one of three storage warehouses. The material is kept separate based on wood type and moisture content, with the green furnish being dried in the "green furnish dryer" before being added to the production line.

During production, the stored furnish is transferred to one of two buildings where the moisture content is further adjusted, and urea-formaldehyde (UF) resin or melamine formaldehyde resin is added. The raw product then moves by conveyer to one of two production lines where material is formed and pressed into particleboard sheets. After trimming and finishing, the final product is placed on pallets and prepared for shipping either by truck or rail. Supporting facilities include various storage buildings, administrative offices, a sander dust-fired boiler, a natural gas-fired boiler, a sander dust-fired green furnish dryer, air pollution control equipment, stormwater and wastewater ponds and land application fields.

There are three general categories of wastewater at the site: sanitary wastewater (which is discharged to the local publicly owned treatment works (POTW)), process wastewater, and industrial non-process wastewater. Process wastewater consists of wet electrostatic precipitator (WESP) wastewater, regenerative thermal oxidizer (RTO) wash water, resin tank area cleanup wastewater, laboratory (quality control) wastewater, air compressor condensate, roof wash water, miscellaneous cleanup waters, and blowpipe cleaning wastewater. Non-process wastewater consists of boiler blowdown and associated waters, non-contact cooling water and fire system flush water. Industrial stormwater is also generated across the site. **Industrial wastewater effluent** includes industrial stormwater, industrial wastewater consisting of non-contact cooling water, boiler blowdown, fire system flush water, and process wastewater. Stormwater is commingled with industrial wastewater effluent and routed to the ponds and may be land applied. Evaluation for the need of a separate stormwater permit for stormwater not routed to the wastewater ponds is conducted separately of WPCF permitting actions. The facility does not currently have a 1200-Z permit assignment.

Kronospan La Grande generates approximately 6.4 million gallons (MG) per year of industrial wastewater effluent (OM&M Plan Update, Nov 2022), which contains 3,399 mg/L (range: 2,944 to 6,982 mg/L) TDS, 18.09 mg/L TKN, 0.12 mg/L N02+N03 and 874.3 mg/L (range: 764 to 8,540 mg/L) sodium. All process wastewater, except for laboratory wastewater, is discharged to a two-cell 60-mil, HDPE-lined pond referred to as the Process Water Pond (PWP). Laboratory

wastewater is discharged to the local POTW. Non-process wastewater and stormwater may also be discharged to the PWP. Water stored in the PWP may be irrigated on adjacent land application sites and landscaped areas subject to an approved OM&M Plan.

Table 2. Projected Process Wastewater Volumes[1]
Woodgrain Millworks, Inc. - Particleboard Facility, Island City, Oregon
WPCF 103044, OM&M Plan Updated 11/11/22

Wastewater Source	Estimated Flow[2] (gal/month)	Operating Period (months)	Total Volume[3] (gal/yr)
Wet Electrostatic Precipitator	131,760	12	1,581,120
Regenerative Thermal or Catalytic Oxidizer	25,000	12	300,000
Boiler Waters @ 50% of actual discharge	225,000	12	2,700,000
Air Compressor Condensate	2,500	12	30,000
Roof Washwater/Blowpipe Cleaning	150,000	12	1,800,000
Total	534,260		**6,411,120**

NOTES:
[1] Based on conservative estimates. Does not include exempt process wastewaters (except boiler waters) or stormwater.
[2] Maximum generation on a monthly basis, from Table 1.
[3] Estimated maximum flow. Does not include well water or CWP water, which can be added as needed.

According to the *2021 Operations Summary and 2022 Irrigation and Crop Plan Update* (February 2022), most of the process wastewater generated originates from WESP, which in conjunction with a regenerative thermal oxidizer, is required to remove particulate matter and organic compounds from the green furnish dryer exhaust. WESP wastewater has high sodium concentrations due to drying of green wood and biomass combustion to generate energy, and use of caustic to clean WESP electrodes. The facility plans to continue to use WESP wastewater in the green furnish dryer. Land application of industrial wastewater effluent, which contains WESP wastewater, should only be undertaken if PWP capacity issues occur, or other emergency actions are required. If land application of WESP process wastewater is being considered, a detailed plan must be developed and described in the OM&M to ensure loading rates will not cause significant impacts to soils and groundwater.

Annual data (2019-2022) provided by the facility shows seasonal increases in pH in the Process Water Pond and ROD pond. The facility mitigates high pH levels by adding freshwater from groundwater well (GW LogID: UNIO 641) (Appendix A). High levels are associated with summer algal blooms, however more data may be needed to assess its impact to groundwater. Water from the ROD Pond is routed through a constructed wetland before discharge into an adjacent unlined storage lagoon (Cooling Pond) that has been excavated/constructed with possible hydraulic connection to groundwater. Water from the Cooling Pond is recirculated through the facility's industrial non-contact cooling system or directed to the PWP to augment crop irrigation requirements.

Division 340-040-0020 sets numerical groundwater quality reference and guidance levels. The guidance level for pH in groundwater is 6.5-8.5. Due to the cooling pond discharge and potential connection to groundwater, the effluent pH of the pond is required to meet the groundwater pH standards.

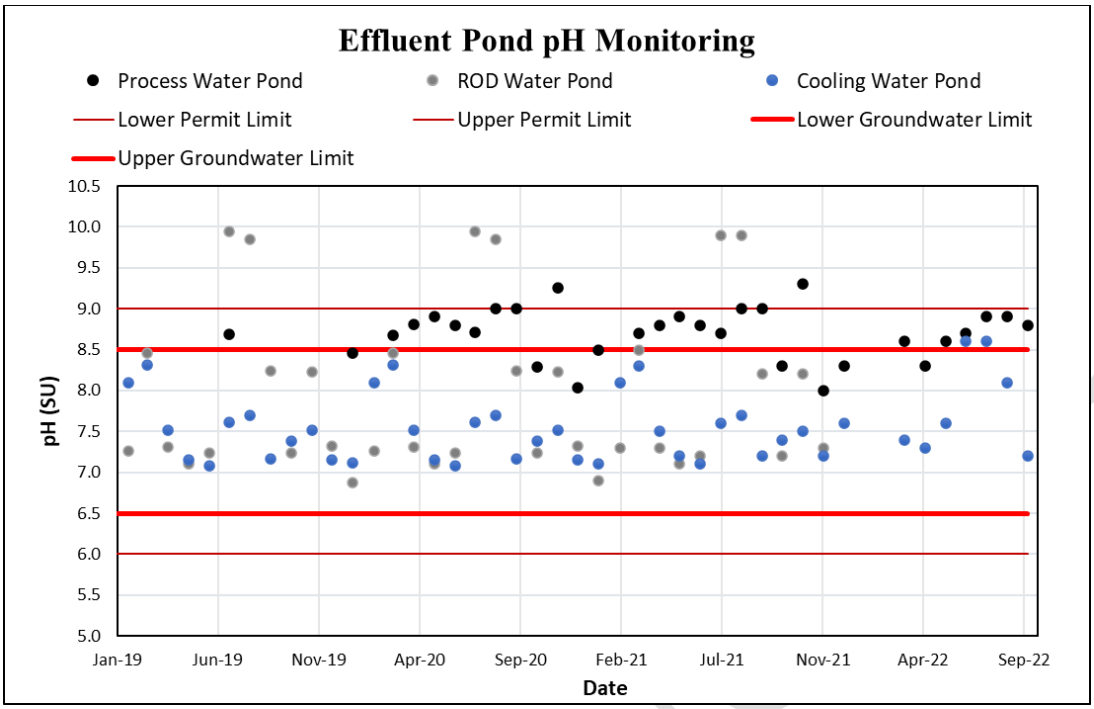

Figure 2-1: Kronospan La Grande Site Map

Figure 2-2: Kronospan La Grande Site Plan

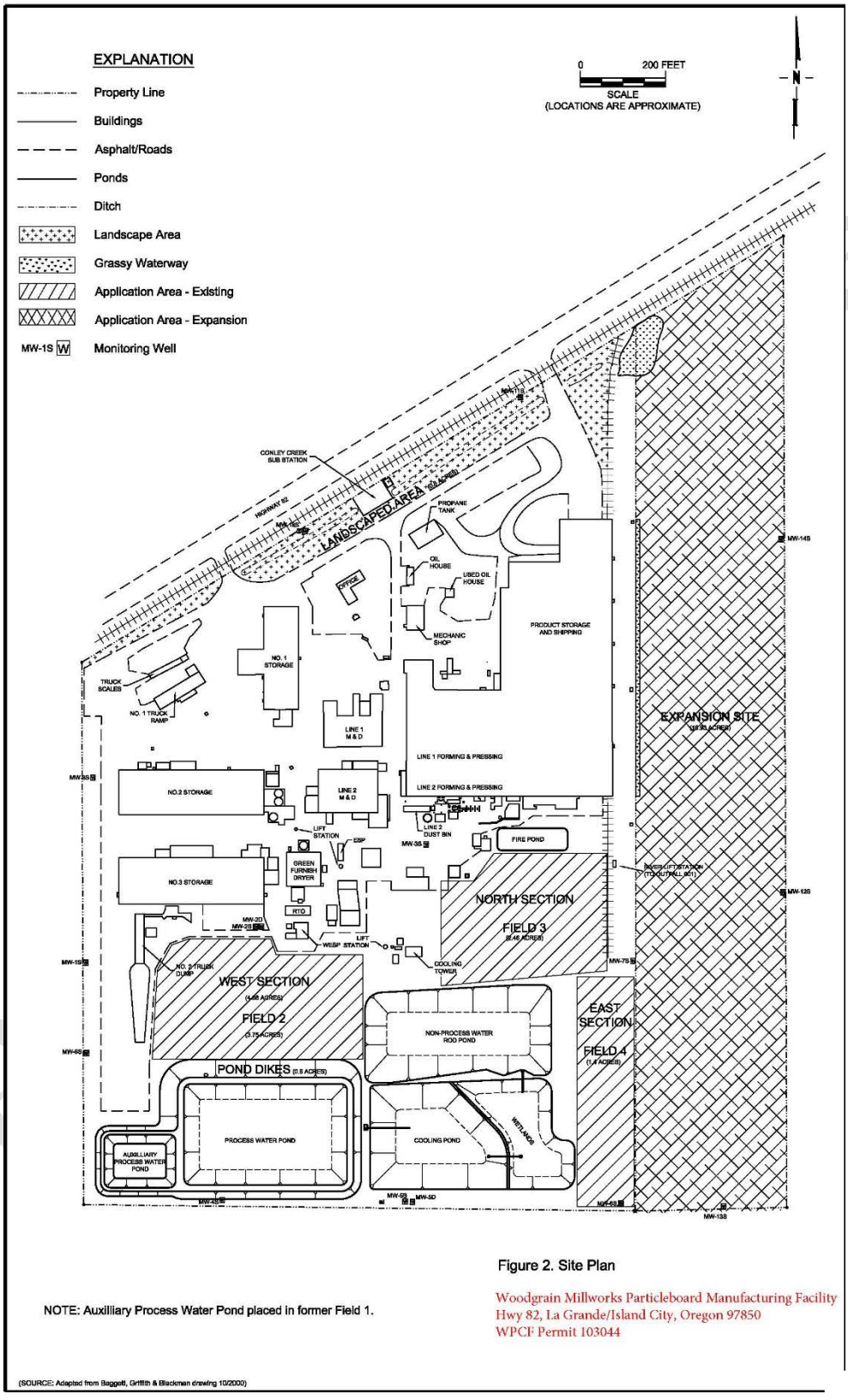

Figure 2. Site Plan

NOTE: Auxilliary Process Water Pond placed in former Field 1.

Woodgrain Millworks Particleboard Manufacturing Facility
Hwy 82, La Grande/Island City, Oregon 97850
WPCF Permit 103044

(SOURCE: Adapted from Baggett, Griffith & Blackman drawing 10/2000)

Figure 2-3: Kronospan La Grande Water Reuse Schematic

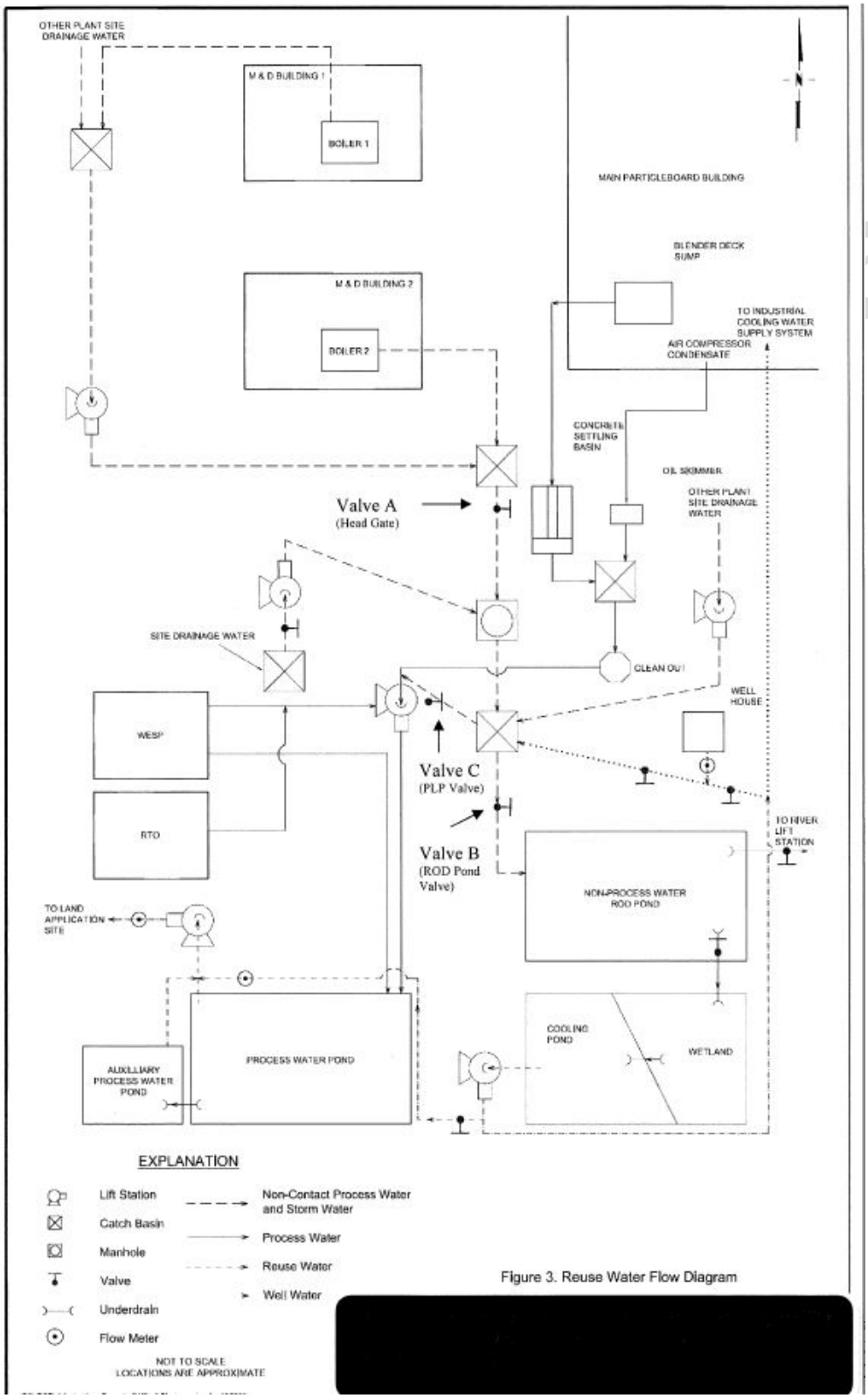

Table 2-1: List of Outfalls

Outfall Number	Type of Waste	Lat/Long	Existing Flow[1] (mgd)
001	Industrial wastewater effluent	45.3474423, -118.026555	6.4
002	Land Application (Industrial wastewater effluent, stormwater, and freshwater)	Specified in DEQ-approved OM&M Plan	

Notes:
1. Existing Flow = existing average annual flow (OM&M Annual Update, 2022)

2.2 Compliance History

The permit was previously operated by Boise Cascade, the permit was then transferred on December 10, 2018, to the current operator, Woodgrain Millworks, Inc. The facility was last inspected by DEQ on May 4, 2023, in conjunction with gathering information to support the permit renewal process. The facility was found to be operating in compliance with the terms and conditions of the WPCF permit at that time.

A review of discharge monitoring reports indicates that the permittee has met all existing permit monitoring and reporting requirements to the date of the permit renewal.

Since the last permit renewal in 2013, the facility documented violations and compliance issues that resulted in the issuance of the following enforcement actions:

- May 10th, 2016 – Warning Letter (2016-WL-1553) was issued for failure to always maintain wastewater treatment and control facilities systems, a Class II violation.
- June 13th, 2016 – Warning Letter with Opportunity to Correct (2016-WLOTC-1646) was issued for two violations; violation of leaching prohibition, this was considered a Class II violation, and failure to submit complete DMRs, a Class III violation.
- October 31st, 2019 – Warning Letter (2019-WL-5091) was issued for violation of OM&M plan, permittee discharged process wastewater to a non-process wastewater pond, a Class II violation.

2.3 Groundwater

In a previous permit cycle, Boise was required to submit a Water Quality Analysis Report (WQAR) dated November 26, 2003, with proposed groundwater concentration limits or concentration limit variances. Based on the report, the Department concluded that background concentrations appeared to be increasing and that groundwater appeared to be mounded at the up-gradient property boundary adjacent to Momentive Specialty Chemicals (formerly Hexion Chemical), possibly due to an underground water line leak. Hence, the permittee was asked to

investigate the cause of the mounding and to propose alternative methods to develop groundwater concentration limits or to propose other alternatives to limits.
On July 27,2005, the permittee notified the Department that a water leak had been discovered in a buried fire suppression water line at the adjacent Hexion Chemical facility. The leak was repaired during the week of November 28, 2005. However, because of the likelihood that the groundwater mound would subside after the leak was repaired, it was determined that the facility should continue groundwater monitoring for a year and then submit an evaluation of the data. The Department received the evaluation on March 20, 2007. Because groundwater conditions continue to be in a state of flux, the Department supported Boise's proposal to continue groundwater monitoring.

According to the facility's OM&M Annual Report (2022), trends in groundwater quality data for downgradient well MW-4, show increasing concentrations of selected constituents. Based on this, continued groundwater monitoring will be required to better assess if concentration increases are related to a previous leak in the PWP (which was repaired in 2015), due to a new leak in the PWP membrane or pressure main, or to off-site and upgradient groundwater impacts.

Additionally, more recent groundwater data shows mounding, however, more refined information is needed to determine the cause. Groundwater typically will mound when moving through finer grained sediments or material with lower hydraulic conductivity, such as those present beneath the pond sites. Due to the presence of shallow groundwater, and the absence of a liner in the ROD pond and wetland, minimal leakage of the pond can contribute to mounding. In addition, several inconsistencies have been found with the facility's groundwater contour maps; therefore, more accurate contour maps will be required as part of a water quality analysis report (WQAR) as a condition of Schedule C of the permit.

2.4 Industrial Wastewater Effluent

Land Application

The land application sites consist of several small areas and total approximately 24.5 acres: 3.75 acres north of the PWP (Field 2), 2.46 acres north of the Retention, Overflow, and Discharge (ROD) Pond (Field 3), and 1.40 acres east of the ROD Pond (Field 4). The Expansion Site includes 16.90 acres along the eastern boundary of the facility (Fields 5N and 5S). The Expansion Site is separated into North and South zones due to the current irrigation infrastructure in place.

Water may be pumped from the PWP via buried pipe and applied to the crops using wheel lines and a limited number of hand lines and water cannons. Currently, the facility is using freshwater (supplemental water) from groundwater well for irrigation (GW LogID: UNIO 641) (Appendix A). The freshwater well source is permitted through Oregon Water Resources Department separate from the WPCF permit.

Landscaped areas that can receive wastewater cover approximately an acre and are located along the northern boundary adjacent to Highway 82. These areas may be irrigated with either potable

municipal water or wastewater through a hand line or drip system. In addition, the facility generates approximately 104 MG per year of non-process wastewater and stormwater.

On an annual average basis, non-process wastewater contains 894 mg/L TDS 2.2 mg/L TKN and 0.1 mg/L N03. Industrial wastewater effluent (boiler blowdown and associated waters, non-contact cooling water and fire system flush water) and stormwater are discharged to the ROD Pond or to the PWP. Dikes and levees around the PWP, ROD and Cooling Pond are sprinkled with non-process water directly from the Cooling Pond to maintain vegetative cover.

3. Schedule A: Effluent Limit Development

No discharge to navigable waters is permitted. All wastewater is stored in lagoons and must be irrigated only on DEQ-approved land application sites in accordance with an OM&M Plan.

All activities concerning industrial wastewater effluent must conform to an OM&M Plan approved by DEQ. Specific crops, application rates and buffers are included in the required OM&M plan. All industrial wastewater effluent must be distributed on land, for dissipation by evapotranspiration and controlled seepage by following sound irrigation practices.

3.1 Industrial Wastewater Effluent Land Application (Outfall 002)

Schedule A of the permit requires the permittee to apply industrial wastewater effluent according to an OM&M Plan. Industrial wastewater effluent is industrial stormwater, industrial wastewater consisting of non-contact cooling water, boiler blowdown, fire system flush water, and process wastewater. Schedule A also restricts the application of industrial wastewater effluent to prevent the following:

- Irrigating above agronomic rates,
- Adverse impact to groundwater,
- Offsite surface runoff or subsurface drainage through drainage tile,
- Creation of odors, fly and mosquito breeding, or other nuisance conditions.

3.2 Groundwater

DEQ may evaluate the need for a full assessment of the facility's impact on groundwater quality if there is any evidence of an adverse impact resulting from the facilities operation or the facility fails to operate in accordance with permit conditions. Schedule A of the proposed permit includes a condition prohibiting adverse impacts to groundwater.

A condition in Schedule C requires the facility to conduct a WQAR. Upon approval of the analysis, this permit will be modified to include final concentration limits.

4. Schedule B: Monitoring and Reporting Requirements

Schedule B of the permit describes the minimum monitoring and reporting necessary to demonstrate compliance with the proposed effluent limits. Detailed monitoring frequency and reporting requirements are in Schedule B of the proposed permit. The required monitoring, reporting and frequency for many of the parameters are based on DEQ's monitoring and reporting matrix guidelines, permit writer judgment, reporting requirements for similar facilities of this type and size and to ensure the needed data is available for the next permit renewal.

The monitoring data provide DEQ with information to evaluate the performance of the industrial facility for influent, the lagoons, and effluent. The authority to require periodic reporting by permittees is found at ORS 468.065(5).

Monitoring requirements for the ROD, Cooling and Process Water Ponds are included in the permit for the permittee to track the proper functioning of the lagoons and monitoring for performance of the treatment system. Additionally, the permittee is required to monitor land applied industrial wastewater effluent, the land application area, supplemental water (freshwater from groundwater well), soil, and crops in accordance with the permit and DEQ-approved OM&M Plan.

Minimum groundwater monitoring requirements are provided as a condition in Schedule B; however, groundwater monitoring must be done in accordance with the Department-approved Groundwater Monitoring Plan.

5. Schedule C: Compliance Schedule

The permittee must complete a WQAR within twelve months of the permit effective date. The WQAR will require the permittee to conduct a review of groundwater data and evaluate appropriate concentration limits. Upon approval of a WQAR, the permit will be modified and/or a condition of approval will be included in the WQAR review to incorporate final groundwater concentration limits in Schedule A.

6. Schedule D: Special Conditions

The proposed permit contains the following special conditions. The conditions include the following:

6.1 Operation, Monitoring and Management Plan

A new permit condition requires the submittal of an Operation, Monitoring and Management (OM&M) plan describing the management for the land application of industrial reuse water and the reuse of process and wastewater solids.

6.2 Emergency Response and Public Notification Plan

The permittee must have an up-to-date spill response plan for prevention and handling of spills and unplanned discharges.

6.3 Groundwater

A condition that requires the permittee update the groundwater monitoring plan when modifications are made. This condition describes well management and the requirements of the groundwater monitoring plan.

7. Schedule F: WPCF General Conditions

This schedule includes conditions and definitions that are applicable to all WPCF permits in Oregon of this type.

8. Next Steps

The Kronospan La Grande facility has submitted a complete WPCF permit application. DEQ will send the draft permit documents to the applicant for review and comment, and then proceed with a Category II permitting action for public notification as per OAR 340-045-0027.

DEQ will respond to comments received during the comment period. All those providing comment will receive a copy of DEQ's response. Interested parties may also request a copy of DEQ's response. Once comments are received and evaluated, DEQ will decide whether to issue the permit as proposed, to make changes to the permit, or to deny the permit. DEQ will notify the permittee of DEQ's decision. If substantive changes are made to the permit, then an additional public notice period may occur. DEQ may also revise this fact sheet or update the fact sheet through memorandum.

Appendix A: Oregon Water Resources Groundwater Well Identification

Oregon Water Resources Department
Groundwater Information System

Groundwater Site: UNIO 641

Site Identification (Click to Collapse...)

GW LogID:	UNIO 641 Well Log Database
GW Well Tag Number:	
Tag Verified on Well:	No
Site Type:	WELL
Primary Use:	
Unused Status:	
Site Source Organization:	
Site Source OWRD:	
Established By:	Emily Bray-Nash
Established Date:	03/26/2009
Bonded Company:	STOFFEL BROS. DRILLING CO.
Stage:	COMPLETE

Location (Click to Collapse...)

Latitude/Longitude

Latitude:	45.34912525	Horiz. Error:	100.00 ft.
Longitude:	-118.02600723	Datum:	WGS1984
Lat/Long Source:	WR FINAL PROOF MAP		

Location

TRSQQ:	WM 2.00S38.00E35SENW
Tax Map:	
Taxlot:	
24 Quad:	
Basin:	8 - Grande Ronde
County:	Union
WM District:	6
WM Region:	E
LSD Elev:	Accy: Datum:
Elev Source:	

Groundwater Mapping Tool

Maxar | Oregon Water Resour

Water Rights (Click to Expand...)

Well Construction History (Click to Collapse...)

Well Construction History

Well Log id	Well Log	Work Type	Startcard	Well Tag	Owner Name	First Water	Max Case. Diam.	Max Case. Depth.	Max Seal Depth.	Max Depth	Completed Depth	Complete Date
UNIO 641	Log	NEW			BOISE CASCADE CORP.						899.00	8/16/1965

Well Log	Aquifer	Aq at Max Depth	System Aquifer	Regional USGS Aquifer	Local USGS Aquifer
UNIO 641					

Well Test

Well Log	Test Type	Yield(gpm)	Drawdown	Duration (hr)	Calculated Specific Capacity (gpm/ft)
UNIO 641	Pump	100.0	21.0	3.0	4.76

State of Oregon
Department of Environmental Quality Memorandum

To: Morgan Olson, Plant Manager
Kronospan La Grande LLC
62621 Hwy 82
Island City, Oregon 97850

Date: June 18, 2024

cc: Source File, Kronospan La Grande LLC
former: Woodgrain Millwork, Inc. Island City Particleboard, Union County

From: Anna Morgan-Hayes, Water Quality Permitting and Compliance
Eastern Region, Bend

Subject: DEQ Response to Applicant Review Comments on Appeal of Newly Issued Permit
WPCF No. 103044

On February 16, 2024, DEQ received a formal request to appeal the newly issued renewal WPCF permit No. 103044 for the Woodgrain Millwork, Inc. Island City Particleboard facility located in Union County, Oregon. The permit authorizes the facility to dispose of stormwater and industrial wastewater effluent consisting of non-contact cooling water, boiler blowdown and fire system flush water in the Retention, Retention Overflow and Discharge (ROD) Pond, constructed wetland, and Cooling Pond in accordance with the conditions of this permit. The appeal request was followed by an informal meeting on March 18, 2024, and included DEQ Office of Compliance Enforcement, Eastern Region Water Quality Permitting and Compliance, and Woodgrain Millwork staff and contracted representatives. Subsequently, during the appeal process, the permittee requested an ownership transfer, effective May 22, 2024. DEQ received the transfer request on June 18, 2024. The permit and fact sheet have been updated to reflect that the permit has transferred from Woodgrain Millworks, Inc. Island City Particleboard to Kronospan La Grande LLC.

A memo (Attachment 1) and applicant review draft of the permit and fact sheet were provided to the permittee on April 24, 2024. The permittee submitted applicant review comments to DEQ on May 8, 2024. This memo details the permit revisions and DEQ's response to the applicant review comments made by the permittee:

Permit Revisions

1. The permittee provided comment on the face page of the permit:

> 1. **Under "Facility Type and Location" Page 1:**
> Particleboard does not have any "lagoons" on site. The site only has Detention and Treatment ponds. To avoid any confusion in the future with any onboarding of new personnel, Particleboard requests that the wordage be changed from "lagoons" to "Detention and Treatment ponds" to simplify understanding.

DEQ permitting language is consistent with EPA permitting practices requiring that treatment, detention, evaporative, and infiltration storage areas are identified as lagoons for permitting purposes. No changes have been made to the permit.

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2. The permittee provided comment on Schedule A.1 of the permit:

> **2. Under Schedule A: Waste Discharge Limits:**
> - **Under 1. Permitted System: section a:**
> The terms Process Wastewater used interchangeably with Wastewater is confusing. Process Wastewater and Non-Process Wastewater, industrial wastewater and industrial effluent are different things and should not be used interchangeably. This makes it hard to understand what is included and/or excluded. Industrial wastewater is referenced in section a. However, industrial effluent is referenced in section c. Particleboard requests that this wordage is cleaned up for clarity and to simplify understanding.

Schedule A.1(a) of the permit (page 3) previously defined Process Wastewater as "(stormwater and industrial wastewater) consisting of non-contact cooling water, boiler blowdown, stormwater, and fire system flush water in the Retention, Retention Overflow and Discharge (ROD) Pond, constructed wetland, and Cooling Pond in accordance with the conditions of this permit." Paragraph 3 of the permit fact sheet, 2.1 describes definitions:

> There are three general categories of wastewater at the site: sanitary wastewater (which is discharged to the local publicly owned treatment works (POTW)), Process wastewater, and industrial non-process wastewater. Process wastewater consists of wet electrostatic precipitator (WESP) wastewater, regenerative thermal oxidizer (RTO) wash water, resin tank area cleanup wastewater, laboratory (quality control) wastewater, air compressor condensate, roof wash water, miscellaneous cleanup waters, and blowpipe cleaning wastewater. Non-process wastewater consists of boiler blowdown and associated waters, non-contact cooling water and fire system flush water. Industrial stormwater is also generated across the site.- **Industrial wastewater effluent** is industrial stormwater, industrial wastewater consisting of non-contact cooling water, boiler blowdown, fire system flush water, and process wastewater. Stormwater is commingled with industrial wastewater effluent and routed to the ponds and land applied is covered by this WPCF permit. -Evaluation for the need of a separate stormwater permit for stormwater not routed to the wastewater ponds is conducted separately of WPCF permitting actions. The facility does not currently have a 1200-Z permit assignment.

For clarity, all process wastewater references in the permit are updated to: **industrial wastewater effluent**. The following changes have been made to Schedule A.1(a-c) of the permit:

SCHEDULE A: WASTE DISCHARGE LIMITS

1. Permitted System

a. The Permittee is authorized to dispose of ~~Process Wastewater (~~stormwater and industrial wastewater effluent~~)~~ consisting of non-contact cooling water, boiler blowdown, stormwater, and fire system flush water in the ~~Retention,~~ Retention Overflow and Discharge (ROD) Pond, Process Water Pond (PWP), constructed wetland, and Cooling Pond in accordance with the conditions of this permit.

b. Upon DEQ-approval of an Operations, Monitoring and Management (OM&M) Plan, the permittee is approved to dispose of stormwater and industrial wastewater effluent ~~consisting of process and non-process wastewaters in the~~ from the Process Water Pond (PWP) at land application sites authorized in accordance with conditions of this permit.

c. In accordance with the terms and conditions of this permit, the Permittee is authorized to collect, store, treat and land apply industrial wastewater effluent and waste solids only from sources listed in this permit and/or the DEQ approved Operations, Monitoring and Management (OM&M) Plan.

Language requested in Schedule A.1(a) “and at land application sites” is not included. The authorization to dispose of stormwater and industrial wastewater effluent is included in Schedule A.1(b).

Schedule A.5 of the permit:

- Under 5. Industrial Wastewater and Stormwater Land Application (Outfall 002) Again, using effluent is confusing. Industrial wastewater, Industrial effluent, and industrial wastewater effluent are used interchangeably many times. These have different meanings and Particleboard would ask that the wordage is cleaned up for clarity and to simplify understanding.

All references to industrial wastewater or process water have been updated to “industrial wastewater effluent”. Previously, DEQ attempted to differentiate between waste streams attributed to each lagoon, however, all process water will now be identified as industrial wastewater effluent for simplicity. These lagoons are monitored and characterized individually, as required in Schedule B of the permit.

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3. The permittee provided comment on Schedule B.1 of the permit:

3. **SCHEDULE B: MINIMUM MONITORING AND REPORTING REQUIREMENTS**
   - **Under 1. Reporting Requirements:**
     Again, the terms Process Wastewater used interchangeably with Wastewater is confusing. Process Wastewater and Non-Process Wastewater, industrial wastewater and industrial effluent are different things and should not be used interchangeably. Based on this, Industrial wastewater effluent is very confusing. Particleboard would again like to ask that the wordage be cleaned up for clarity throughout the whole permit and to simply understanding.

   - Based on the reporting requirement in Table B1: the Operation, Monitoring & Management Plan for industrial wastewater effluent land application, there is no mention of well water. Are we correct in our interpretation that this means we can irrigate with well water without DEQ approval? Particleboard would ask for clarification on the parameters of this reporting requirement.

All references to industrial wastewater have been updated to "industrial wastewater effluent".

The permittee may continue to operate under the previous DEQ-approved OM&M Plan which establishes land application by well water/freshwater/groundwater in addition to identifying parameters. Permit Revision #3 in the memo provided to Woodgrain Island City Particleboard on April 24, 2024 included the following response regarding freshwater:

> Schedule B.1, **Table B1: Reporting Requirements and Due Dates**, column 3, requires the Operation, Monitoring & Management Plan (OM&M) for industrial wastewater effluent distribution due "90 days prior to land application of wastewater effluent". Until such time that the facility plans to land apply industrial wastewater effluent, the previous DEQ-approved OM&M Plan is sufficient for land application of freshwater (from the described groundwater supply source). The updated plan is currently in review at DEQ. For clarity, the language in the table has been updated to "At least 90 days prior to land application of industrial wastewater effluent" column 3. An approved plan is needed for the land application of industrial wastewater effluent.

Schedule B.3 of the permit:

- **Under Monitoring and Reporting Requirements Page 9:**

Tables B2: , B3: , B4:.
Clarification on report statistics, time periods, and minimum frequency is needed.
Year-round when irrigating – We do not irrigate year-round.
Daily value – twice a week is the frequency. Does this mean the value of each of the individual days we collect data?
Monthly average – if the time period is Year-Round, does monthly average refer to a 12-month average? Or are you referring to an individual average for each individual month? i.e 12 different averages?
Quarterly average – if the time period is Year-Round, does quarterly average refer to a 12-month, 4 quarter average? Or are you referring to an individual average for each individual month within a 3-month quarter? i.e 4 different averages?

Year-round when irrigating: The permittee is required to monitor year-round but only when irrigating. No changes are made to the permit.

Daily value: the value reported for the day of collection. If the frequency of monitoring is twice a week, the permittee should report a value for each day of collection twice per week. No changes are made to the permit.

Monthly average: month means a calendar month, therefore, a monthly average is the average of the calendar month reported as a single value. Since monitoring is required year-round, the permittee should report twelve individual monthly averages in a year period. No changes are made to the permit.

Quarterly average: Quarter means January through March (Q1), April through June (Q2), July through September (Q3), or October through December (Q4). Each set of three months should be averaged and reported as a single value. The permittee should report a value for Q1, Q2, Q3, and Q4. No changes are made to the permit.

Schedule B.4 of the permit:

- **Under 4. Monitoring and Reporting Requirements Page 14:**

  Table B5: - Under effluent flow when irrigating, daily the sample type/required action is "measurement and calculation." Particleboard would like to request this be changed to "calculation", eliminating the measurement action. All other parameters are calculation based.

The permittee should have a measurement device for flow to the land application area identified in the proposed OM&M Plan to be approved for land application of industrial wastewater effluent. The previously approved OM&M Plan provides language regarding flow measurements from the PWP, CWP, and water supply well.

Table B6: - Under Total Flow supplemental irrigation water when irrigation, daily the sample type/action is "measurement". Particleboard would like to request this be changed to "calculation", eliminating the measurement action. All other parameters are calculation based.

The permittee should have a measurement device for freshwater/groundwater flow to the land application area. The previously approved OM&M Plan provides language regarding flow measurements from the PWP, CWP, and water supply well.

Table B6: - Particleboard would like clarification on the term "supplemental water" The Title of table B6: Supplemental Water Land Application System Monitoring. Please provide clarity as to simplify understanding of "supplemental water"

The term **supplemental water** includes freshwater/groundwater/well water identified in the OM&M Plan for irrigation at the land application site.

- **Under 5. Soil Characterization Monitoring Page 15:**
  Table B8: - Particleboard would ask that Soil Moisture, inches of water/ft, minimum frequency would be changed from "Weekly" to "Weekly When Irrigating." Please provide clarification. Soil monitoring should not be necessary if we are not irrigating?

Schedule B.5, **Table B8(b): Soil Moisture Monitoring** is prefaced with the following language:

> "The Permittee must monitor soil moisture at each land application site by an accepted soil moisture monitoring method as defined in the approved OM&M Plan when land applying industrial wastewater effluent." This statement is applicable to all parameters within the table.

No changes have been made to the permit.

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4. Schedule D.1 of the permit:

4. **Under Schedule D: Special Conditions:**
   - **Under 1. Operation, Monitoring and Management Plan (OM&M) page 18:**
     It again is stated, "Prior to land application with industrial wastewater effluent." Particleboard would request clarification. No mention of well water. Does this mean that irrigation with well water can be conducted without DEQ prior approval?

DEQ provided clarification in a memo to Woodgrain Island City Particleboard on April 24, 2024:

> "Until such time that the facility plans to land apply industrial wastewater effluent, the previous DEQ-approved OM&M Plan is sufficient for land application of freshwater (from the described groundwater supply source)."

The groundwater supply source is identified as well water in the OM&M Plan. No changes have been made to the permit.

Fact Sheet Revisions

The fact sheet has been revised for minor grammar, clarification, and consistency in language throughout the document.

If you have any questions, please do not hesitate to contact me. The best way to contact me is via email at anna.morgan-hayes@deq.oregon.gov and I can also be reached on my cell phone at (541) 246-4562.

Attachment 1: DEQ Memo, April 24, 2024

State of Oregon
Department of Environmental Quality Memorandum

To: Daniel Mitchell, Environmental and Safety Project Manager
Woodgrain Millwork, Inc., Lumber and Composites Division
1917 Jackson Avenue
La Grande, Oregon 97850

Date: April 24, 2024

cc: Source File,
Woodgrain Millwork, Inc. Island City Particleboard, Union County

From: Anna Morgan-Hayes, Water Quality Permitting and Compliance
Eastern Region, Pendleton

Subject: Formal Request for Hearing to Appeal Newly Issued Permit WPCF # 103044 Revisions

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On February 16, 2024, DEQ received a formal request to appeal the newly issued renewal WPCF permit No. 103044 for the Woodgrain Millwork, Inc. Island City Particleboard facility located in Union County, Oregon. The permit authorizes the facility to dispose of stormwater and industrial wastewater consisting of non-contact cooling water, boiler blowdown and fire system flush water in the Retention, Retention Overflow and Discharge (ROD) Pond, constructed wetland, and Cooling Pond in accordance with the conditions of this permit. The appeal request was followed by an informal meeting on March 18, 2024, and included DEQ Office of Compliance Enforcement, Eastern Region Water Quality Permitting and Compliance, and Woodgrain Millwork staff and contracted representatives.

Permit Revisions

As a result of further review and details discussed during the informal meeting and provided in the appeal request, the following revisions to the permit have been provided:

1. Schedule B.1, **Table B1: Reporting Requirements and Due Dates**, column 5, previously referenced “See Note c.” which is no longer included in the notes section. This language has been removed from the table, as there is no longer a Note c.

2. Schedule B.1, **Table B1: Reporting Requirements and Due Dates**, column 3, previously required the annual report (Discharge Monitoring Report) (Tables B2 – B10) due on February 15. At the request of the facility, this date has been changed to March 1.

3. Schedule B.1, **Table B1: Reporting Requirements and Due Dates**, column 3, requires the Operation, Monitoring & Management Plan (OM&M) for industrial wastewater effluent distribution due “90 days prior to land application of wastewater effluent”. Until such time that the facility plans to land apply industrial wastewater effluent, the previous DEQ-approved OM&M Plan is sufficient for land application of freshwater (from the described

groundwater supply source). The updated plan is currently in review at DEQ. For clarity, the language in the table has been updated to "At least 90 days prior to land application of industrial wastewater effluent" column 3. An approved plan is needed for the land application of industrial wastewater.

4. Schedule B.2(a)(i)(B) states: "The permittee must submit monitoring data and other information required by this permit for all compliance points by the 15th day of the month following the reporting period unless specified otherwise in this permit or as specified in writing by DEQ." This language has been updated to: "The permittee must submit monitoring data and other information required by this permit for all compliance points by the date provided in Table B1 or as specified in writing by DEQ."

5. Schedule B.2(a)(iii) states: "The permittee must sign and certify submittals of Discharge Monitoring Reports (DMRs) and other information in accordance with the requirements of Section D8 within Schedule F of this permit." Discharge Monitoring Reports (DMRs) refers to the annually required reports of monitoring data. Schedule F, Section D8 is incorrectly referenced. This language has been updated to "The permittee must sign and certify submittals of Discharge Monitoring Reports (DMRs), annually required reports, and other information in accordance with the requirements of Section D3 within Schedule F of this permit."

6. Schedule B.2(b)(iii) states: "The permittee must submit monitoring data and other information required by this permit for all compliance points by the 15th day of the month following the reporting period unless specified otherwise in this permit or as specified in writing by DEQ". This language has been updated to "The permittee must submit monitoring data and other information required by this permit for all compliance points by the date provided in Table B1 or as specified in writing by DEQ."

7. Schedule B.2(c)(i-iii) references conditions related to laboratory quantitation limits (QLs). Woodgrain inquired "Because the permit was written separate from the OM&M plan, is the existing OM&M plan adequate until we submit a revised OM&M plan." No revisions have been made to the permit language for this condition. Until such time that the facility plans to land apply industrial wastewater effluent, the previous DEQ-approved OM&M Plan is sufficient for land application of freshwater (groundwater). The updated plan is currently in review at DEQ.

8. Schedule B.3 Monitoring and Reporting Requirements, **Table B3: Cooling Pond Monitoring Requirements** and **Table B4: Process Water Pond Monitoring Requirements**: Woodgrain provided the following:

   > *Referenced out of the Permit Renewal Fact Sheet Introduction in conjunction with the Permit condition Monitoring and Reporting Protocols in Schedule B: Section 3. All tables.* Effluent monitoring of pond pH will be required more frequently to better track and understand pH fluctuations. During permit renewal, DEQ determined that the current monitoring frequency is insufficient to determine adequate groundwater protection. **5 Days a week is the new requirement? Where is the basis of insufficient monitoring? What is the potential benefit from this? This is**

excessive and costly, we propose that our current monitoring methods are efficient for pH monitoring, especially since this is a closed loop system."

DEQ requires monitoring consistent with monitoring matrices identified for facility type and size throughout the state. After further discussion with the permittee and evaluation of the site conditions, seasonal pH monitoring, in-lieu of year-round monitoring, has been incorporated into the permit for Table B3 and Table B4 as follows:

Summer (May 1 – October 31): pH (SU), 2/week
Winter (November 1 – April 30): pH (SU), 2/month

DEQ believes the updated monitoring frequency allows for more consistent monitoring in the permit renewal to assess potential issues while accommodating the permittees concern over the burden of monitoring 5 days a week year round.

Table B2: ROD Pond Monitoring Requirements has not been revised and requires monthly pH monitoring.

If the facility demonstrates compliance with effluent limits established in Schedule A for two full years beginning with the issuance of the permit, the permittee can request a reduction in monitoring in writing. To this effect, Table B3 has been revised to include: "Note c. After such time that the permittee has completed two full years of monitoring and met effluent limits for pH specified in Schedule A, the permittee can submit a request for a reduction in monitoring in writing to DEQ." Table B4 has been revised to include: "Note b. After such time that the permittee has completed two full years of monitoring and met effluent limits for pH specified in Schedule A, the permittee can submit a request for a reduction in monitoring in writing to DEQ."

9. Table B3: Cooling Pond Monitoring Requirements, column 1: previously referenced "See Note c." in reference to Total Dissolved Solids. This note is no longer included in the notes section and is not needed. This language has been removed from the table, as there is no longer a Note c. related to Total Dissolved Solids.

10. Schedule B.4(a) previously stated "The permittee must monitor industrial wastewater effluent for Outfall 002 as listed below. The samples must be representative of the industrial wastewater effluent discharged at any location identified in the DEQ-approved Operation, Monitoring and Management Plan (OM&M Plan)." Outfall 002 is the permitted land application area discharge point. The permit language has been updated to "The permittee must monitor industrial wastewater effluent at the land application site (Outfall 002) as listed below. The samples must be representative of the industrial wastewater effluent discharged at any location identified in the DEQ-approved Operation, Monitoring and Management Plan (OM&M Plan)."

11. Schedule B.5(a) previously stated "At each approved application site, the Permittee must collect representative soil samples from each foot increment of the top 5-feet of the soil column and analyze each, by accepted laboratory methods, for the following parameters." At the request of the permittee, and for clarity this language has been updated to: "When land

applying industrial wastewater effluent, at each approved application site the Permittee must collect representative soil samples from each foot increment of the rooting depth identified in the DEQ-approved OM&M Plan of the soil column and analyze each, by accepted laboratory methods, for the following parameters."

12. The permittee provided comment on the basis for flow monitoring of the ponds in the permit (see Attachment 1). The permit and groundwater data have undergone review by DEQ Hydrogeology subject matter experts who provided the following summary:

    It has been established that the facility discharges to an unlined pond (Cooling Water Pond CWP), which is currently monitored for pH, Total Dissolved Solids (TDS), Total Kjeldahl Nitrogen (TKN), and Nitrate Nitrogen (NO3-N). Based on data provided by the facility for GW Monitoring Well (MW-6S) (generally downgradient of the CWP), GW Monitoring Well (MW-5S) (may be downgradient of a portion of the pond), and GW Monitoring Well (MW-2S) (generally upgradient of the pond), concentrations of Calcium (Ca), Chloride (Cl), Magnesium (Mg), Sulfate Sulfur (SO_4-S), and TDS appear highest in MW-6 and Chemical Oxygen Demand (COD), Iron (Fe), and Total Phosphorus (P) are highest in MW-5S. This suggests that the CWP may have an impact on groundwater quality. The clay-lined ROD pond discharges to the wetland and the closest downgradient well is MW-7S, with MW-2S generally upgradient. While the clay-lined pond may have less impact on groundwater, the leaching rate is unknown. Additionally, MW-7S has the highest concentrations of Manganese (Mn) and Sodium (Na).

    Based on review of the available data and the permittee's request, DEQ agrees to revise the flow monitoring requirement provided the additional constituents of concern are included in ongoing pond wastewater monitoring for the facility. Flow monitoring has been removed from Table B2: ROD Pond Monitoring, Table B3: Cooling Water Pond Monitoring, and Table B4: Process Water Pond Monitoring. In lieu of flow monitoring, to better assess the impacts of the ROD and CWP on groundwater, the following monitoring is required in the revised permit:

    Table B2: ROD Pond Monitoring Requirements
    Manganese (Mg) (mg/L), quarterly, grab sample
    Sodium (Na) (mg/L), quarterly, grab sample

    Table B3: Cooling Water Pond Monitoring Requirements
    Calcium (Ca), (mg/L), quarterly, grab sample
    Iron (Fe), (mg/L), quarterly, grab sample
    Magnesium (Mg), (mg/L), quarterly, grab sample
    Total Phosphorus (P), (mg/L), quarterly, grab sample

13. **Table B2: ROD Pond Monitoring Requirements**, column 3, respective to solids removed, previously stated "Year-round". The table has been updated to "Upon Removal".

14. **Table B3: Cooling Water Pond Monitoring Requirements,** column 3, respective to solids removed, previously stated "Year-round". The table has been updated to "Upon Removal".

15. **Table B4: Process Water Pond Monitoring Requirements**, column 3, respective to solids removed, previously stated “Year-round”. The table has been updated to “Upon Removal”.

Fact Sheet Revisions

1. Section 1. Introduction has been updated to include: “Following DEQ’s initial reissuance of this permit on January 29, 2024, the permittee requested a hearing contesting the need for the WPCF permit. DEQ and Woodgrain Millwork Inc. engaged in subsequent settlement negotiations. As a result of those negotiations DEQ is reissuing the permit.”

2. Section 1. Introduction, summary of the major changes to the permit previously stated, “Effluent monitoring of pond pH will be required more frequently, to better track and understand pH fluctuations. During permit renewal, DEQ determined that current monitoring frequency is insufficient to determine adequate groundwater protections. Additionally, the pH limit has been modified in accordance with Division 340-040-0020 so that groundwater is sufficiently protected from potential seepage from the facility’s ponds...” This language has been updated to “Effluent monitoring of pond pH will be required more frequently on a seasonal schedule, to better track and understand pH fluctuations. In lieu of flow monitoring, quarterly monitoring for Calcium (Ca), Iron (Fe), Magnesium (Mg), and Total Phosphorus (P) are required in the Cooling Water Pond to assess impacts to groundwater from the pond. Similarly, quarterly monitoring for Manganese (Mn) and Sodium (Na) are required in the ROD Pond to assess impacts to groundwater from the pond. During permit renewal, DEQ determined that current monitoring is insufficient to determine adequate groundwater protections. Additionally, the pH limit has been modified in accordance with Division 340-040-0020 so that groundwater is sufficiently protected from potential seepage from the facility’s ponds.”
