

Facility Inspection and Regulatory Compliance Evaluation for a Lumber Mill and Aggregate Washing Facility



EKI provided technical support during a citizen lawsuit against the operation of a lumber company's saw mill and aggregate washing facility. The citizen suit alleged that stormwater discharges from the saw mill and aggregate washing facility violated the Federal Water Pollution Control Act (Clean Water Act; 33 U.S.C. §§ 1311(a) and 1342(p)).

EKI conducted a facility inspection and reviewed environmental data and reports to aid in determining potential contaminants in stormwater based upon historical uses of the facility. The previous property owner had historically used pentachlorophenol as a fungicide to treat sawn lumber. Potential sources of stormwater impact included the saw mill, aggregate washing and concrete batch facility, truck wash area, wood compost area, equipment and vehicle fuel areas, and equipment maintenance areas. EKI reviewed the existing Storm Water Pollution Prevention Plans (SWPPPs) for adequacy relative to the citizen lawsuit and estimated storm water runoff volumes at various facilities to determine the adequacy of existing stormwater best management practices (BMPs).

EKI identified and provided to the client recommendations for improvement of the SWPPP and structural and non-structural BMPs at the various areas of the facility. As a result of EKI's review and recommendations, the facility owner improved BMPs at the facility and successfully settled the lawsuit.