UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

CERTIFIED MAIL 7018 2290 0000 9993 5323 FEB 08 2019
RETURNED RECEIPT REQUESTED

Mr. Randy Finley
Lead Man
Concrete Supply Company - Mauldin Facility
1438 Old Stage Road
Simpsonville, South Carolina 29681

Re: Compliance Stormwater Evaluation Inspection
Concrete Supply Co. Mauldin, Simpsonville, South Carolina Permit SCR005476

Dear Mr. Finley:

On December 11, 2018, the U.S. Environmental Protection Agency Region 4 conducted a Compliance Stormwater Evaluation Inspection (CSWEI) at the Concrete Supply Company Mauldin facility located at 1438 Old Stage Road, Simpsonville, South Carolina. The purpose of the CSWEI was to evaluate the facility's compliance with the requirements of Sections 301 and 402(p) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1342(p); the regulations promulgated thereunder at 40 C.F.R. § 122.26; and, the State of South Carolina's industrial stormwater regulations.

The EPA appreciates your cooperation in conducting this CSWEI. Enclosed is the EPA's CSWEI report, evaluating your compliance with the CWA. As a result of the inspection, the EPA may be in further contact with Concrete Supply Company in the future.

While a response from you is not required at this time, if you do wish to respond to the CSWEI report, provide additional information, or otherwise discuss the report, please contact Mark Robertson at the above address or by email at Robertson.Mark@epa.gov.

Sincerely,

Humberto A. Gyman for Dan O'Lone

Daniel J. O'Lone, Chief
Stormwater and Residuals Enforcement Section
NPDES Permitting and Enforcement Branch

Enclosures

cc: Mr. Brian Wisnewski
South Carolina Department of Health and Environmental Control
Mr. Stan Cleveland
Greenville County

U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW, Atlanta, GA 30303

Water Compliance Inspection Report

FACILITY DATA

NPDES ID: SCR005476	**Effective Date:** 10/1/16	**Expiration Date:** 9/30/21
Facility Name: Concrete Supply Company Mauldin Plant		SW-CSCMauldin-12/11/18
Address: 1438 Old Stage Road, Simpsonville, SC 29681		

On-Site Representative(s), Title, Phone Number:	**Responsible Official, Title, Phone Number, Mailing Address:**
Randy Finley, Lead Man (864) 963-3845	Randy Finley, Lead Man 1438 Old Stage Road, Simpsonville, SC 29681 (864) 963-3845

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 12/11/18 1411	**Exit Date/Time:** 12/11/18 1726

NAMES OF EPA AND STATE INSPECTORS

EPA, Region 4: Mark Robertson, Tara Houda
South Carolina Department of Health and Environmental Control: Betsy Seals
Greenville County: Stan Cleveland

AREAS EVALUATED DURING INSPECTION *(Check those areas evaluated)*

X	Permit		Self-Compliance Program		Pretreatment
X	Records/ Records		Compliance Schedule		Pollution Prevention
X	Facility Site Review		Laboratory	X	Storm Water
	Effluent/ Receiving Waters	X	Operations & Maintenance		Combined Sewer Overflow
	Flow Measurement		Sludge Handling/ Disposal		Sanitary Sewer Overflow

INSPECTION NOTES

A photolog is attached to this report.

EPA REPRESENTATIVES

Inspector Signature/Name	Office/Phone Number	Date
Mark Robertson, Environmental Engineer	USEPA Region 4/WPD-NPEB-SRES 404-562-9639	2/8/19
Tara Houda, Environmental Scientist	USEPA Region 4/WPD-NPEB-SRES 404-562-9762	2/8/19
Management Signature/Name	**Office/Phone Number**	Date
Dan O'Lone, Section Chief	USEPA Region 4/WPD-NPEB-SRES 404-562-9434	2/8/19

1. FACILITY INFORMATION

GPS Coordinates	Previous & current General Permit, SIU, & Other Media Permit				
34.767361 -82.295556	Has had prior permit coverage under the general permit.				
Receiving Water(s), Wetlands, or MS4	**Site Acreage & % Impervious Area**		**Type of Ownership**	**Qualify for No Exposure Exemption or No Discharge**	
Greenville County MS4; Unnamed Tributary to Bridge Fork Creek	15 acres, mostly pervious		Corporation	No	
SIC Code(s) Description (Primary & Secondary)	**Years in Operation**	**No. of Employees**	**Hours & Days of Operation**	**Discharge to 303(d) Listed or TMDL Waters**	**Weather Condition**
3273 Concrete Batch Plant	40	<10	Variable, usually 1 shift 5 days.	No	Clear, cold.

2. FACILITY'S OPERATION & PRODUCT DESCRIPTION

Concrete batch plant. Aggregate storage on site, along with concrete washout. City water used for proper moisture in some of the ingredients. Water exits the site to the southwest, northwest, and east.

3. BASIC STORMWATER POLLUTION PREVENT PLAN (SWPPP) INFORMATION

SWPPP TOPICS	YES	NO	N/E
SWPPP on-site (obtain a copy of the plan)	X		
SWPPP Certification • Johnnie Alexander 2/27/18	X		
SWPPP Modified or Update to Current Conditions • Site map was dated 2010		X	
Pollution Prevention Team Named in SWPPP		X	
Employee Training for Stormwater Requirements	X		
Site Description	X		
Site Map • A site map was received during the inspection with flow lines, outfalls, and operations identified.	X		
Summary of Pollutant Sources	X		
Document Evaluates for Unauthorized Non-stormwater Discharges • Site evaluated 7/12/16, 7/14/17, 5/8/18.	X		
Description of the Control Measures • Language in the SWPPP regarding control measures was just a copy and paste section of the permit.		X	
Schedule and Procedures for Good Housekeeping		X	
Schedule and Procedures for Preventive Maintenance		X	
Contains Spill Prevention & Response Procedures			X

• A separate SPCC plan had been prepared for the site.			
Contains Erosion and Sediment Controls and Management of Runoff		X	
Schedule and Procedures for Monitoring	X		
Schedule and Procedures for Inspections • The plan did not contain a schedule; inspections were being done quarterly.		X	

4. RECORD REVIEW

Record Review	YES	NO	N/E
NOI Submitted to SCDHEC • Acknowledged by the state 6/26/17.	X		
Records of Incidents with Spills, Leaks, and/or Other Releases of Pollutants • Most recent spill write-up dated 8/10/2012.	X		
Records of Maintenance and Repairs of Control Measures • No corrective measures recorded. The appropriate tab in the SWPPP notebook was empty.		X	
Records of Routine Inspections • Report for 8/3/18 notes that leaks are not addressed and ongoing; no pH adjustment to wash water; other inspection records present, dated 3/28/18, and 12/20/17.		X	
Records of Periodic Monitoring (benchmark and visual assessments) • Rain event time and date were not collected; analytics done 8/3/18 for chemical oxygen demand, pH, and total suspended solids at 001 outfall; pH tested beyond allowed holding time. • Quarterly visual examination of stormwater discharge by Randy Finley conducted 8/3/18, 6/28/18, 3/28/18, 12/20/17.		X	
Records of Comprehensive Annual Inspections • Conducted 5/2/18 by Johnnie Alexander. Some issues were identified but no record of follow-up action was included in the record.	X		
Records of Employee Training • 10/11/18 with 11 attendees, and signatures; 10/2/17; 10/3/16; 10/27/15.	X		
Records of Benchmark Sampling • The files had no sampling records for 2016, 4 for 2017, and only one for 2018, in August. The August 2018 sampling results came from Rogers & Callcott Environmental Lab in Greenville. • The facility staff stated that pH strips were used for on-site pH monitoring.		X	
Records of Effluent Monitoring • Facility had analyzed runoff samples for *e.coli*. • A low pH exceedance was observed, pH was measured as 3.2 for the 8/3/18 sample. Sample was collected on 8/3 but not analyzed until 8/21. • A high pH of 9.5 and TSS of 508 mg/L were observed for the 3/30/17 sample. • An e.coli sample was analyzed at 618 mpn in the 4/19/17 sample. • A high pH of 10 was measured in the 6/30/17 sample. • A total suspended solids (TSS) value of 110 on 12/20/17 exceeded the benchmark value.	X		
Records of Corrective Actions *(Taken in response to 4 quarters of benchmark exceedances, changes in design or operation resulting in changes to pollutant profiles, or observed failures resulting in unauthorized discharges, numeric limit exceedances.)* • Facility had only one record of taking corrective action since 2012, placing hay bales after a TSS exceedance.	X		
Records of Annual Reporting • Facility did not have records on hand with respect to reporting effluent benchmark exceedances to the state.		X	

5. SITE EVALUATION

Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), potential pollutants, and pollutants off-site

Loading/Unloading Operations	Water and concrete fines were deposited onto the driving areas, which could run off or be tracked out.
Outdoor Storage Facilities	• Aggregate storage was all exposed to stormwater, with municipal water being sprayed actively on the light-weight aggregate storage cell. That water was observed leaving the site to the NE. • The area on the eastern side designated for concrete recycling and crushed concrete storage was covered in water that was trapped by berms on the low sides. This area received stormwater that had been in contact with concrete. Staff stated that they believed that the water evaporated over time or went into the ground. This water was discharging off the NE side of the berm – see photo DSCN1531 for location.
Liquid Storage Tanks, Fueling Stations/Equipment Maintenance Areas, & Cleaning Areas	Most liquid tanks were bermed. The diesel tank was double-walled; only the dispenser portion was bermed. Two carboys for liquid diesel additive were not bermed. Light truck maintenance is done within and next to a building on the SE side of the site. Painting and grinding were being done outdoors.
Management of Run-off Controls (storage areas, diversion ditches, dumpsters, secondary containment, & etc.)	There was a log sheet for recording activities with respect to run-off, but no filled-in log sheets were present in the notebook. Staff stated that the berm on the eastern side of the facility had been raised after neighbor complaints. The recycled holding water pit showed evidence of potential past overflow.
Sediment & Erosion Controls	• Berms were constructed in various areas to manage stormwater runoff. See, for example, picture DSCN1512. • Berms and concrete blocks were used to manage stormwater. See, for example, picture DSCN1515.

6. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Potential Stormwater Discharge Points/Outfall(s) to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)	Stormwater and process water (lightweight-aggregate rinse water) was observed leaving the site in the outfall 3 area. The ground was wet outside the wall in the area labeled as outfall 1; water was leaving the site from the berm near the cell tower (no outfall number). Water was heading towards Greer Drive at the access driveway.
Evidence of Off-site Accumulation of Pollutants Observed in Receiving Water & MS4	The receiving conveyance, tributary to Bridge Fork Creek, was not observed due to time constraints.
Non-stormwater Discharge Off-Site Observed	The rinse water from the lightweight aggregate pile was discharging to outfall 3.

Exit interview conducted with: Randy Finley.

An exit conference was held where the following observations were relayed:

- Elimination of outfalls or outfall monitoring should be discussed with SCDHEC.
- Other potential discharge locations may need to be evaluated for permit coverage, including the discharge to the driveway ditch at Greer Drive and the end of the berm on the east side of the facility.
- Benchmark exceedances trigger further follow-up action at the facility, and records did not show more than one follow-up activity being conducted.

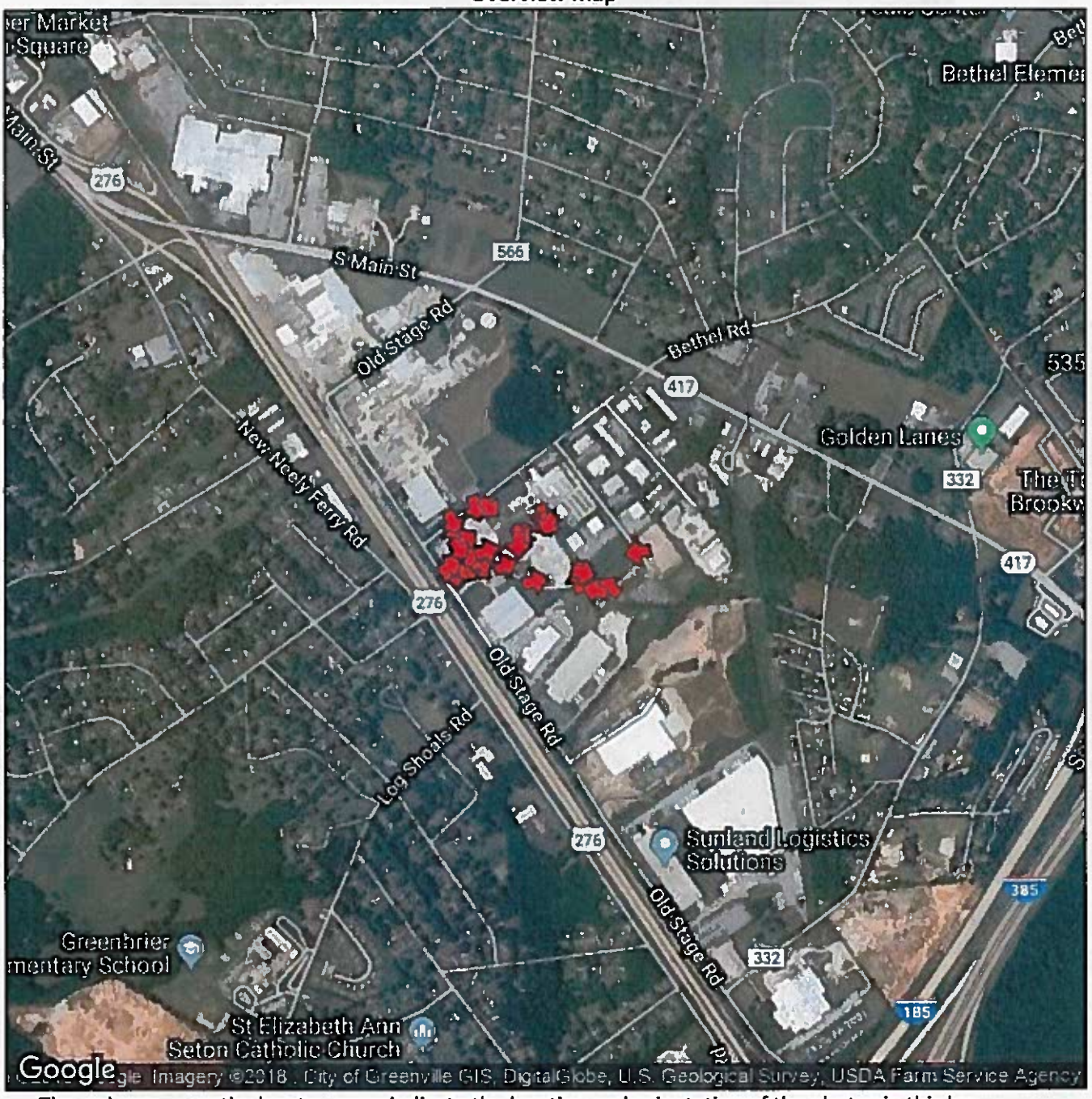
- Effluent exceedances must be reported in a timely manner (within 30 days) to the state outside of the typical data submittal routine.
- Effluent exceedances also trigger follow-up sampling.
- Testing pH with test strips is not an approved EPA method for data required to be submitted under a permit.
- The general permit has other best management practice requirements that the facility had not indicated as being done. These would include regular sweeping of solids, storage of fine particle feed stock in silos,
- Some required SWPPP elements were missing – control measures, monitoring SOPs, and the monitoring schedule detail.
- Facility apparently failed to properly sample in 2016 and may have failed to properly sample in 2018.

Concrete Supply Company – Mauldin Plant

Unpermitted Industrial Stormwater Inspection
SC

December 11, 2018
SW-CSCMauldin-12/11/18
U.S. Environmental Protection Agency - Region 4

Overview Map



The red arrows on the locator maps indicate the location and orientation of the photos in this log.

DSCN1502.JPG

Attributes	
Description	Prior Outfall #1 is at base of wall in background. The facility stated that they have blocked the outfall and no longer treat it as an outfall. Evidence of ongoing drainage off-site at this location was visible from the NW side of the wall.

DSCN1503.JPG

Attributes	
Description	Hand is pointing at location of Outfall #1. The facility stated that they have blocked the inlet to the outfall and no longer treat it as an outfall. Evidence of ongoing drainage off-site at this location was visible on the wet ground in the shadow.

DSCN1504.JPG

Attributes	
Description	Pile with escaped material and stormwater running off. Drainage flows to the driveway to, and ditch along, Greer Drive.

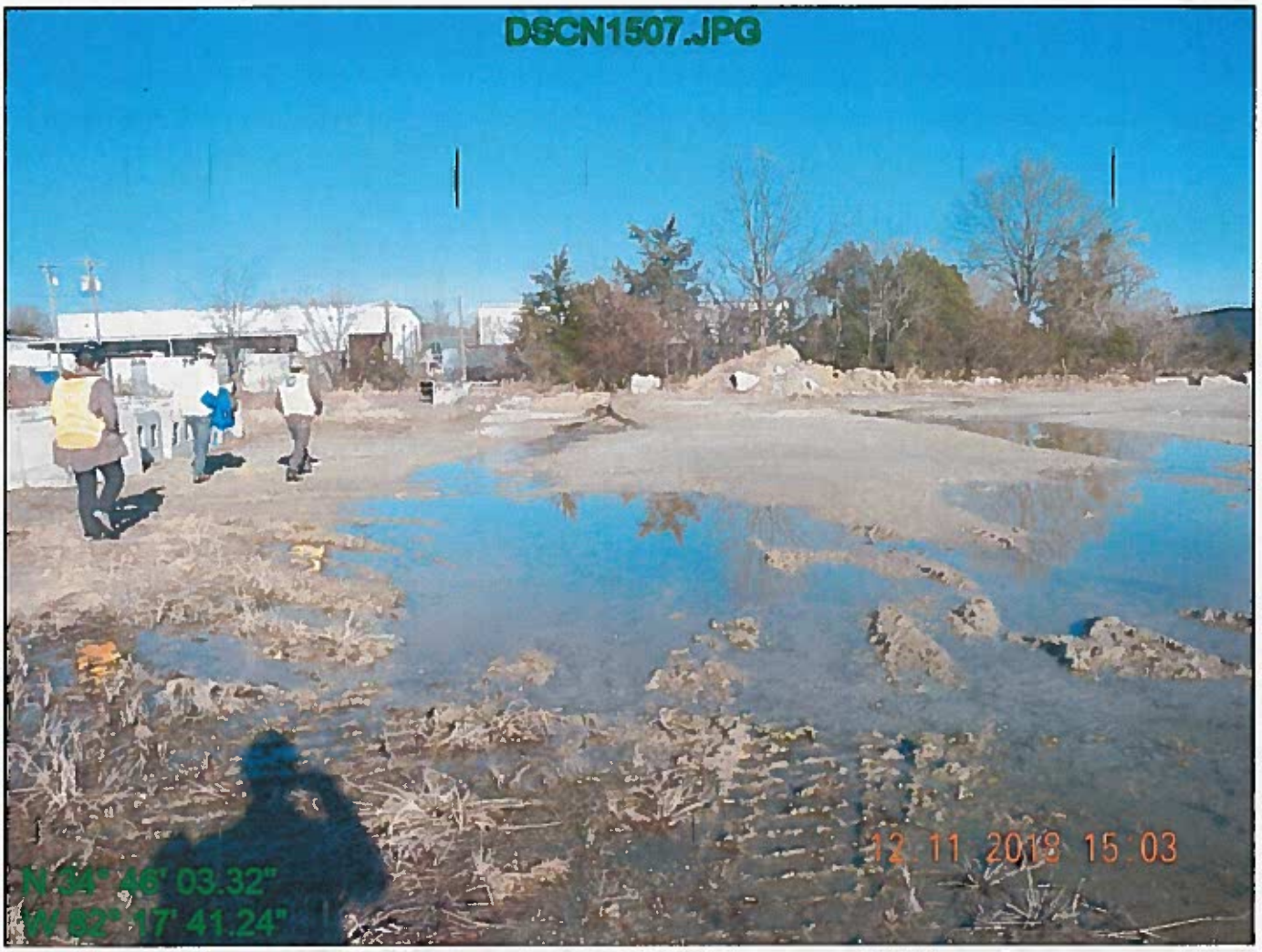
DSCN1505.JPG

Attributes	
Description	View of concrete recycling area. Walking towards the conveyance to Outfall #1.

DSCN1506.JPG

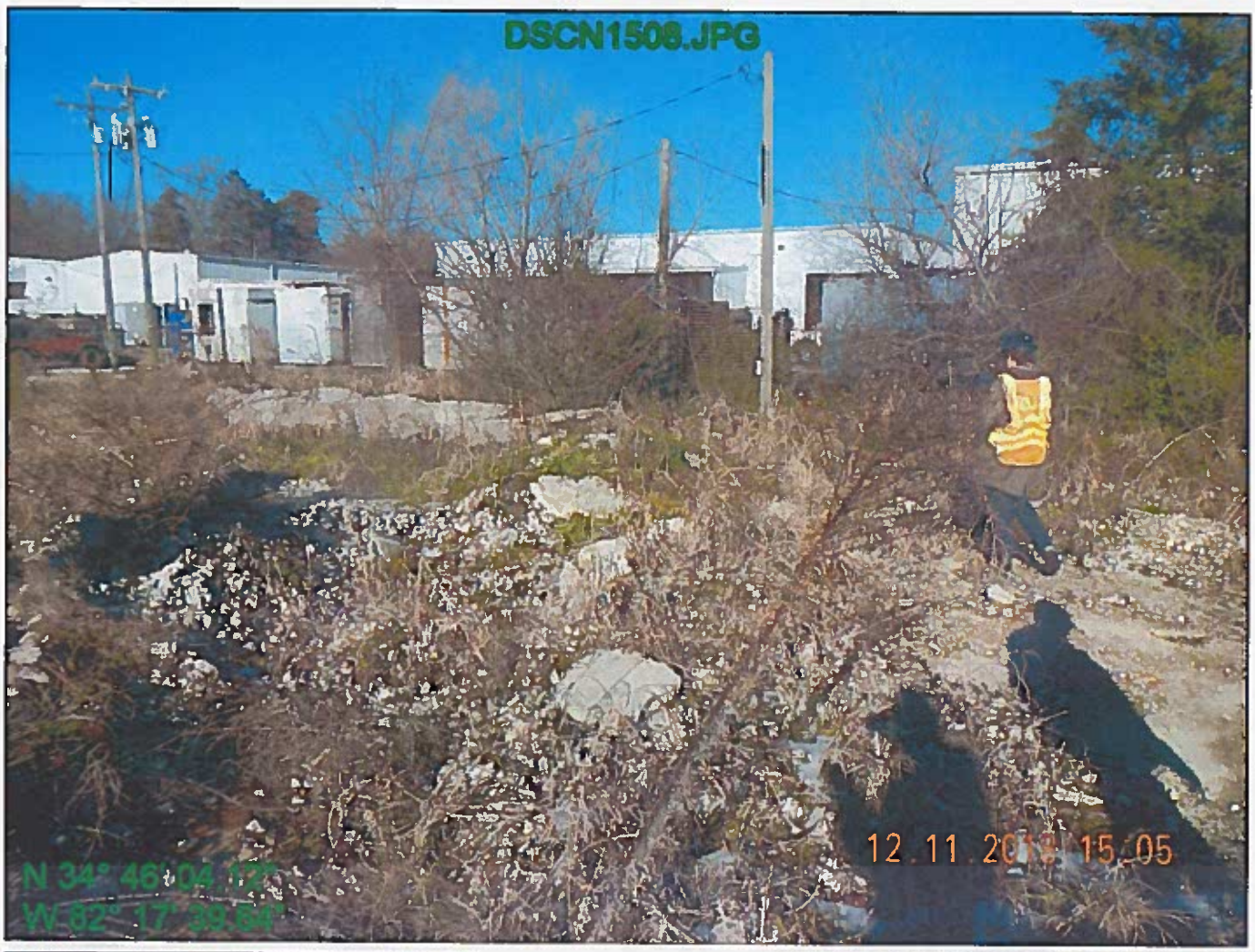
Attributes	
Description	View upgradient of water flowing towards Outfall #1 from the aggregate storage pile. The pile was being watered with city water.

DSCN1507.JPG



Attributes	
Description	View looking downgradient of water flowing towards Outfall #1 from the aggregate storage pile. The pile was being watered with city water.

DSCN1508.JPG

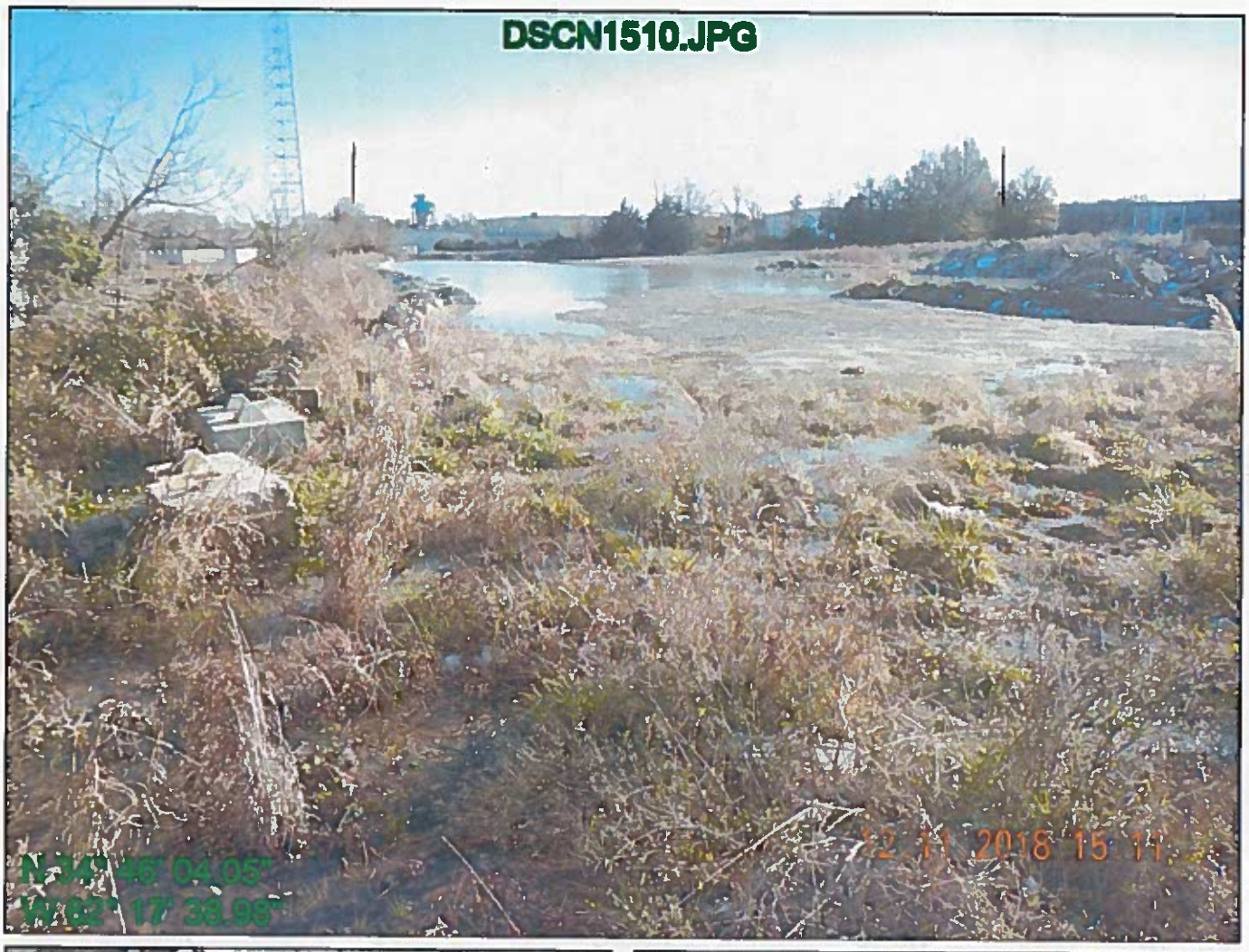


Attributes	
Description	The post in the photo is the approximate location of where the facility used to have Outfall #3. The facility stated that they moved material to block Outfall #3 and no longer treat it as an outfall. The flowing water shown in photo DSCN1507 goes under the concrete slab in the left-center of the photo. The outlet of this conveyance was not readily accessible.

DSCN1509.JPG

Attributes	
Description	The post in the photo is the approximate location of Outfall #3. Outfall 3 is considered to be unused by the facility. The center of the photo is a vegetated ditch along the NE property line.

DSCN1510.JPG



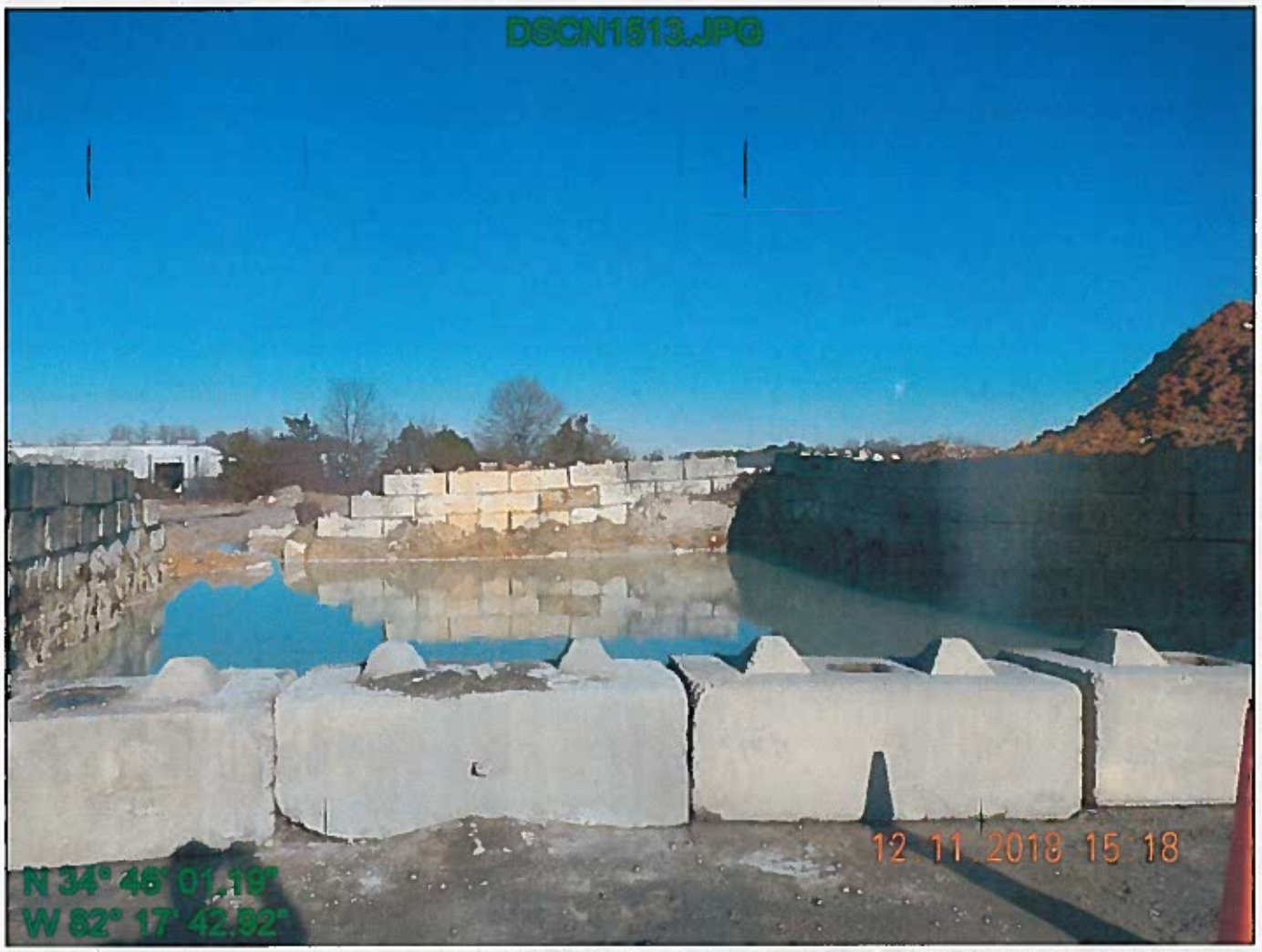
Attributes	
Description	"Returned Concrete Recycling" area with water, on the east side of the facility. Note that the water is nearly at the top of the berm in some locations.

Attributes	
Description	Another view of the Returned Concrete Recycling area.

DSCN1512.JPG

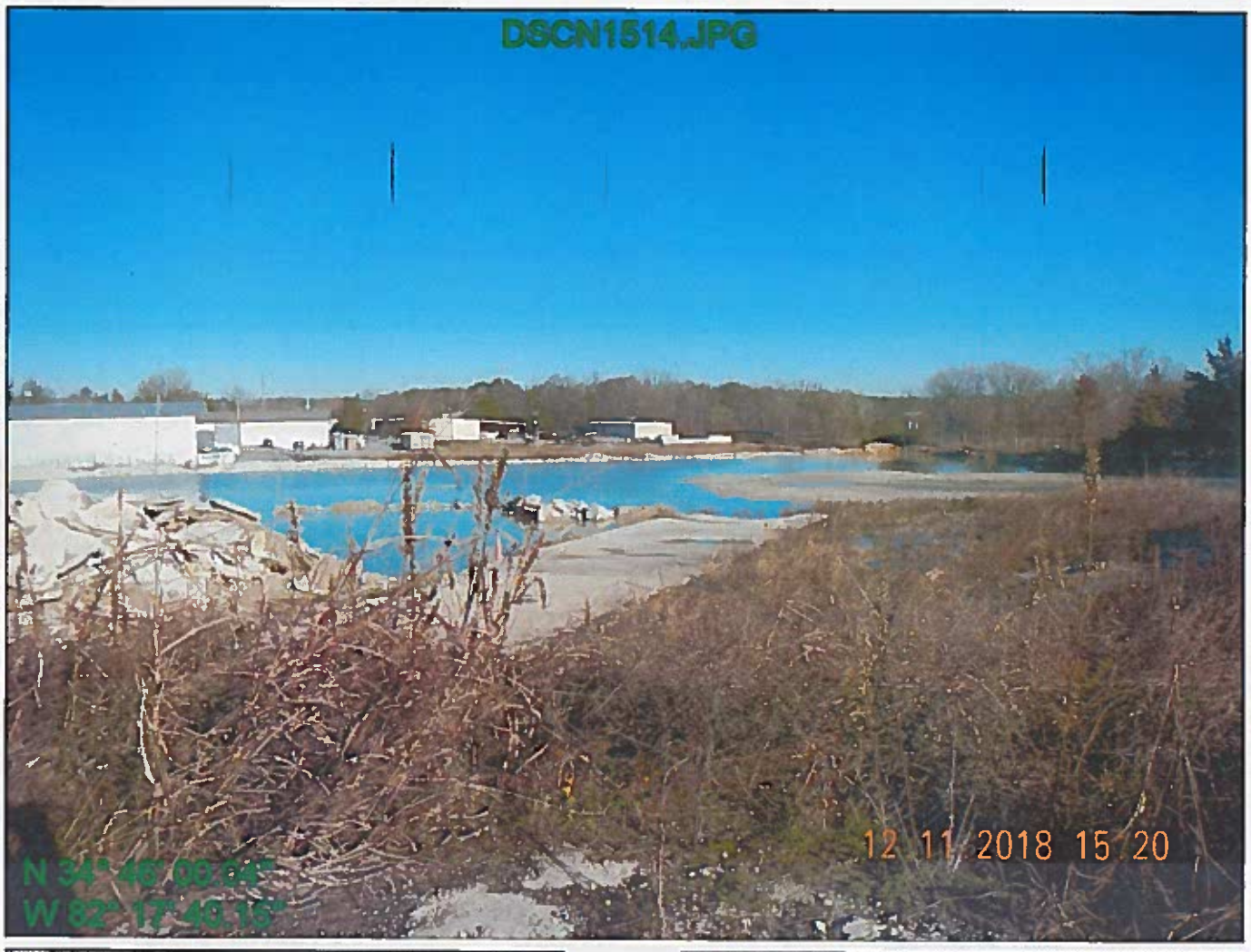
Attributes	
Description	Slurry washout area, northern end.

DSCN1513.JPG



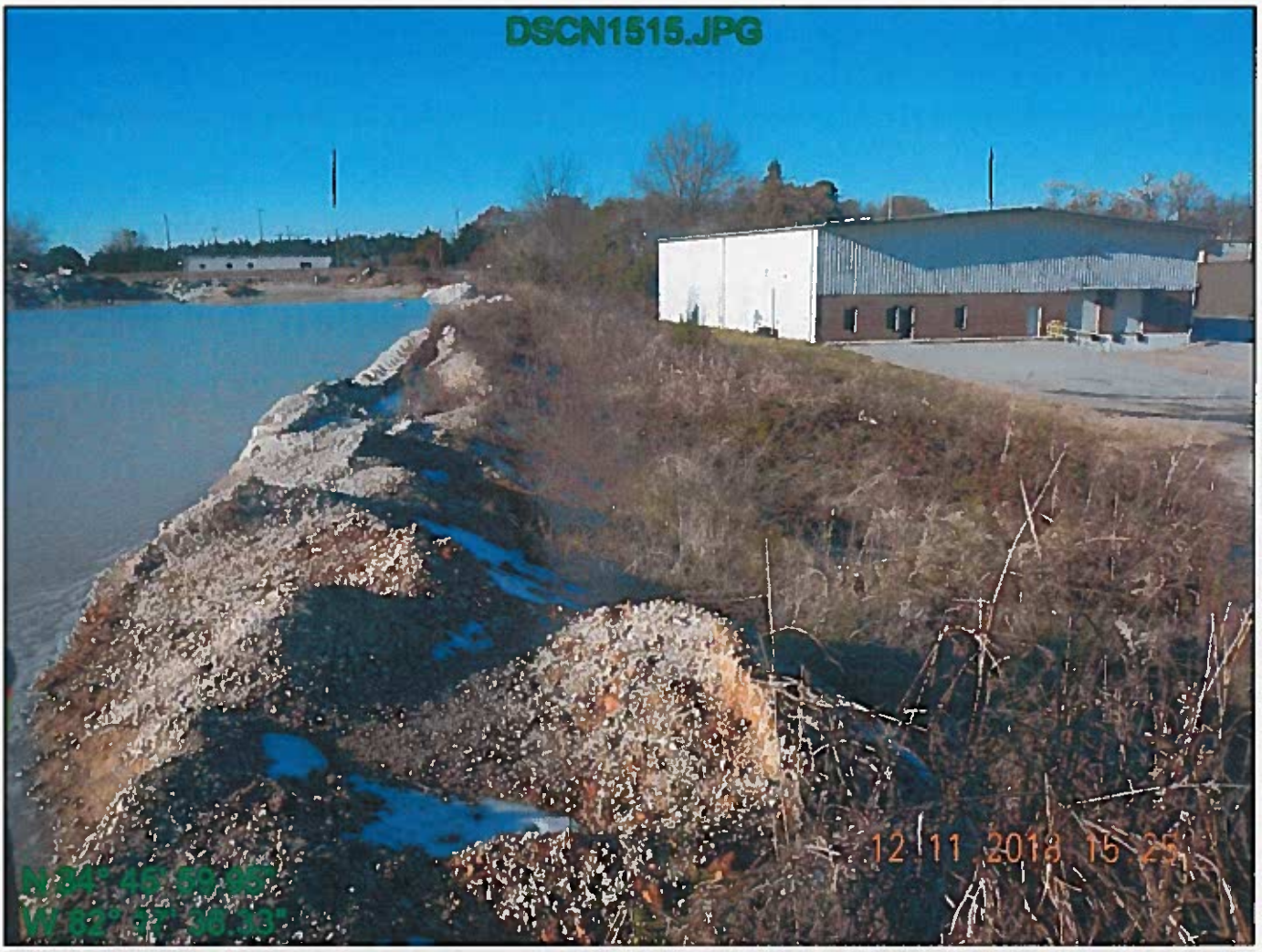
Attributes	
Description	Southwestern side of the slurry washout area. When slurry solids are mucked out, the solids are placed in piles downgradient - see back left in photo.

DSCN1514.JPG



Attributes	
Description	The pond level of the concrete recycling area was near the top of the berm. The adjacent neighbor had complained about water discharge to CSC about a year prior to the inspection, and CSC increased the berm wall height after the complaint.

DSCN1515.JPG

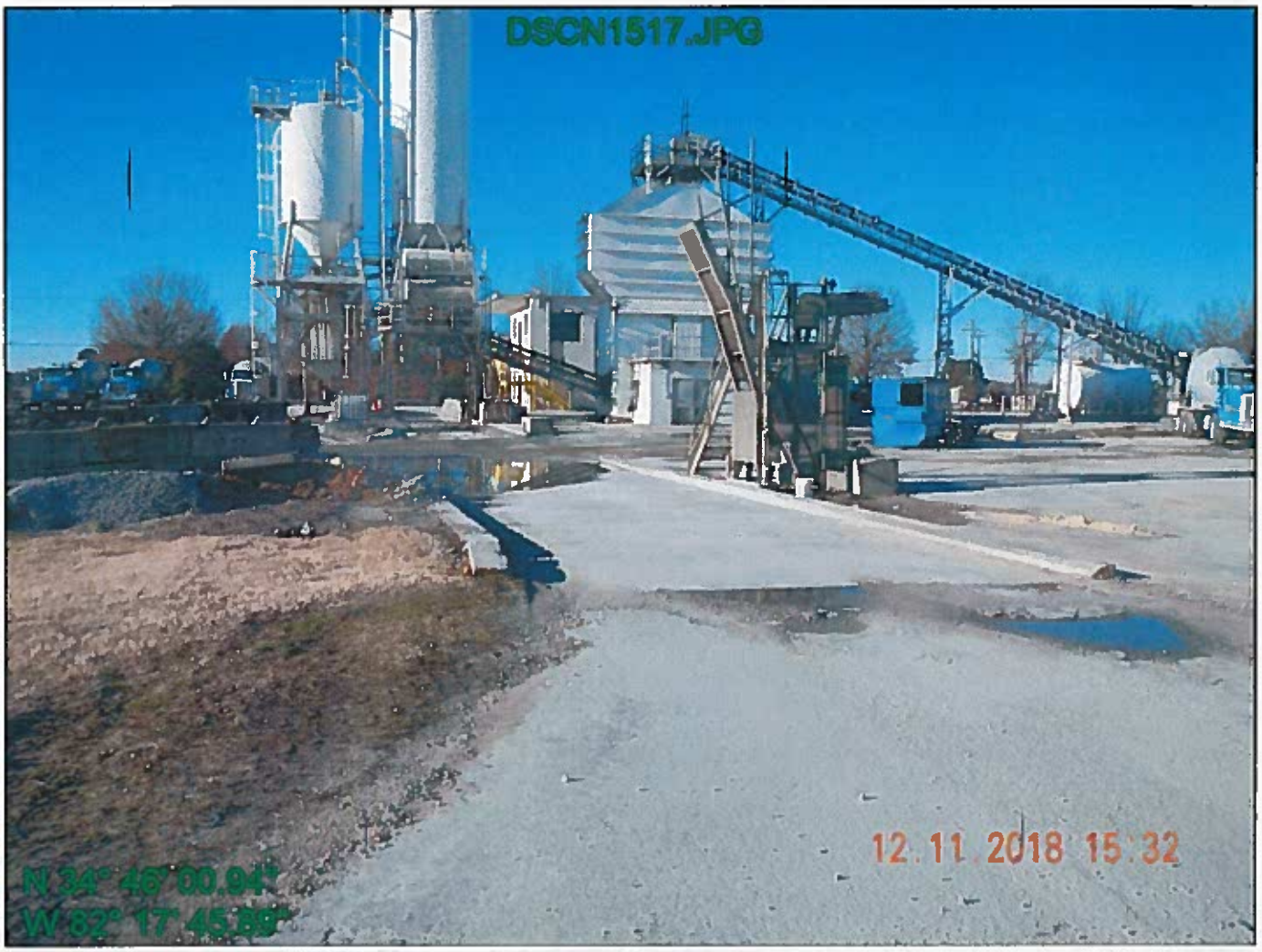


Attributes	
Description	The water in the concrete recycling area pond level is near the top of the berm.

DSCN1516.JPG

Attributes	
Description	Former rail spur at front of facility. Stormwater Outfall #2 is along that line (gravel, mid-photo).

DSCN1517.JPG



Attributes	
Description	Foreground is truck wash area; ready-mix tower in background.

DSCN1518.JPG

Attributes	
Description	Stormwater Outfall #2. Water flows southwesterly, towards photographer.

DSCN1519.JPG

Attributes	
Description	Fluids for truck maintenance and other materials are stored in this building.

DSCN1520.JPG

Attributes	
Description	Mixing and dispensing facilities - the tote at the left serves the truck wash station and the tanks center-right are liquids ad-mixes for various concrete mixes.

DSCN1521.JPG

Attributes	
Description	Sand and other piles are exposed to rainwater.

DSCN1522.JPG

Attributes	
Description	Diesel fill station - double walled fuel tank with bollards and filling plumbing.

DSCN1523.JPG

Attributes	
Description	Pile of light weight aggregate. This pile is sprayed with municipal water through sprinklers.

DSCN1524.JPG

DSCN1524.JPG

CONCRETE SUPPLY CO.

Feasibility Study

Date: March 12, 2018

As of this date, Concrete Supply Co,. LLC does not find it economically or technically feasible to alter the operations and storage practice of this site. CSC believes that the Stormwater control measures in place are suitable for this operation and any change in their design would not improve their performance. Due do the size and nature of our raw material inventories, our storage practices are limited to the size and cost of available substitutes; however within our daily operations we employ BMPs to continually address and correct to the best of our abilities any and all materials that may come in to contact with Stormwater runoff.

Johnie Alexander
Concrete Supply Co
Environmental Manager

12.11.2018 16:32

Attributes	
Description	The SWPPP contained a March 12, 2018 Feasibility Study statement. This "Feasibility Study" note contained no alternatives that were analyzed, nor any cost assessments.

DSCN1525.JPG

Attributes	
Description	Recycled water basin at left-center, and truck washdown station foreground and right.

DSCN1526.JPG

Attributes	
Description	Pump station in water recycling area. The holding basin had 3 inches of freeboard and evidence of past overflows.

DSCN1527.JPG

Attributes	
Description	A closer view of the inlet side of water pump equipment at the recycle water basin. Water level is about 3 inches from overflowing.

DSCN1528.JPG

Attributes	
Description	A view of the recycle water pump headers. Note the sediment deposition indicating previous flows of water from the parking area next to the basin. That water would flow towards the ditch along Old Stage Road.

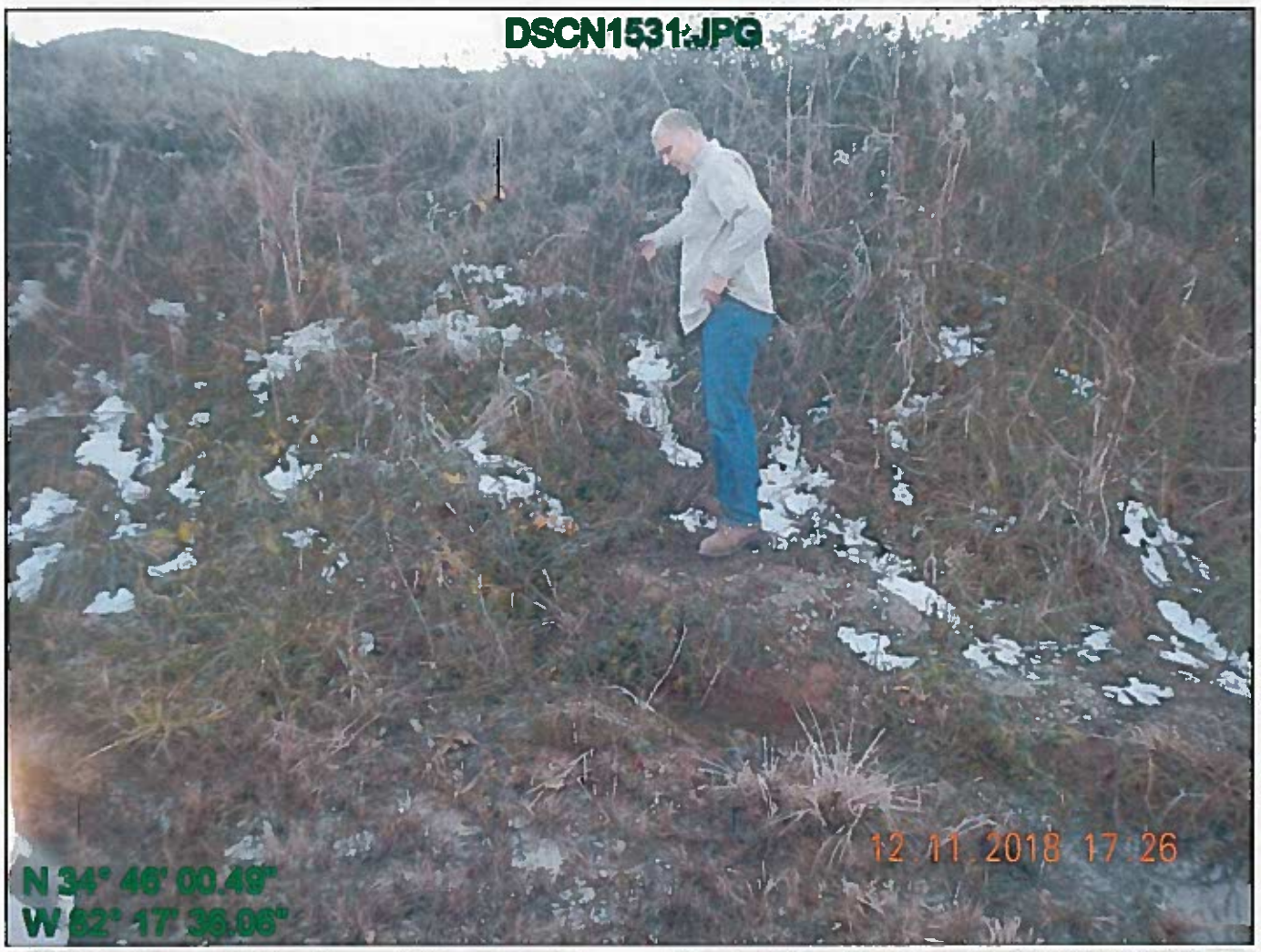
DSCN1529.JPG

Attributes	
Description	Water from the area of the berm surrounding the concrete recycle area (horizon/background center-right) flows towards the photographer.

DSCN1530.JPG

Attributes	
Description	Stormwater conveyance behind recycled concrete area berm.

DSCN1531.JPG



Attributes	
Description	View of inspector pointing at the multiple seeps from the berm wall which were flowing past his feet towards the right lower corner of the photo. These seeps were flowing enough water to be audible.

DSCN1532.JPG

Attributes	
Description	In the foreground is the inlet side of a pipe under the access road. It receives water from the northwestern side of the facility, including from the outlet area of Outfall #3 and the seeps from the berm around the concrete recycling area.

DSCN1533.JPG

Attributes	
Description	Outlet side of the pipe under the road that handles runoff from this side of the site. This conveyance is next to the cell tower access road. Water was observed flowing through this conveyance.

DSCN1534.JPG

Attributes	
Description	Drop inlet downgradient from the pipe in photos DSCN1532 and DSCN1533.