

NPDES Inspection Report - Stormwater Industrial

National Database Information		
Inspection Date: 3/13/2024	Inspection Type: Industrial Stormwater	
Entry/Exit Time: 3:00 pm – 4:00 pm	NPDES ID Number: UTU000041	
SIC Code: 3272	Inspection ID: 202403_ UTU000041	
Lead Inspector and affiliation: Stephanie Meyers / EPA Region 8		
Inspector and affiliation: Althea Wilson / EPA Region 8		
Inspector and affiliation: Jordan Bryant / Utah Division of Water Quality		
Inspector and affiliation: Randy Petersen / West Valley City MS4		
Site/Facility Name and Location: Dura-Crete, Inc. 1475 W 3500 S West Valley City, Utah 84119		
Permit Information		
Is the permit on site and available? Unpermitted facility	Date Application Submitted: Unpermitted facility	
Latitude: 40.697300°N	Longitude: -111.933191°W	
Receiving Water(s): Unnamed, unclassified ditch thence to the Jordan River	Acreage: approximately 13 acres	
Regulatory Inspector's source of information: Facility observations		
Areas Evaluated During Inspection		
Permit	Self-Monitoring Program	<u>Pollution Prevention</u>
Records	Compliance Schedule	<u>Stormwater</u>
<u>Facility Site Review</u>	Laboratory	<u>No Exposure</u>
<u>Effluent/Receiving Waters</u>	Operations and Maintenance	Other:
Flow Measurement	Sludge Handling/Disposal	Other:
Contact Information		
	Name(s)/Title	
Facility Contacts: Primary lead and present during inspections	Chris McKean / Owner / Dura-Crete, Inc. / Primary lead during the inspection	
	Brittney McKean / Vice President/HR / Dura-Crete, Inc. / Present during the closing conference	
Person/Company meeting definition of "Operator"	Dura-Crete, Inc.	
Authorized Official(s) (Per NOI or SWPPP)	N/A, since there is currently no permit for this facility	

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Report Review and Signature		
Drafter Name	Address/Phone Number	Date
Stephanie Meyers	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202	3/25/24
	303-312-6938	
Reviewer Name	Address/Phone Number	Date
Althea Wilson	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202	3/26/24
	303-312-6026	
Supervisor Signature/Name	Address/Phone Number	Date
 EMILIO LLAMOZAS Digitally signed by EMILIO LLAMOZAS Date: 2024.04.15 16:44:16 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ECA-W-N Denver, Colorado 80202	4/12/2024
	Emilio Llamozas	

Inspection Narrative and Site Description
On March 13, 2024, U.S. Environmental Protection Agency (EPA) inspectors Stephanie Meyers and Althea Wilson along with Utah Division of Water Quality (DWQ) inspector Jordan Bryant, and West Valley City Municipal Separate Storm Sewer System (MS4) Stormwater Inspector Randy Petersen arrived at Dura-Crete, Inc. (facility) at 3:00 pm to conduct an inspection and evaluate the facility's need for industrial stormwater permit coverage. The EPA, DWQ, and MS4 performed a joint inspection at this facility. The inspection was announced approximately one week prior to the inspection, to coordinate logistics for the inspection and to ensure that appropriate personnel would be available. The EPA inspectors along with DWQ and the MS4 met with Chris McKean, Owner and Brittney McKean, Vice President/HR of Dura-Crete, Inc. EPA inspector, Stephanie Meyers, presented her credentials and had an opening conference to explain the purpose of the inspection. The inspectors began by going through a series of checklist questions with the facility representatives. Once complete, the inspectors proceeded to inspect the facility and asked questions to the facility representative to help the inspectors evaluate the need for industrial stormwater permit coverage. Throughout the inspection, the inspectors noted their observations in a checklist. Photographs taken during the inspection are included in the attached photo log. Dura-Crete, Inc. is located at 1475 W 3500 S in West Valley City, Utah. The facility was established in 1954 and develops and manufactures precast concrete products such as parking lot bumper blocks,

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Inspection Narrative and Site Description

barriers, dry wells, septic tanks, storm drain boxes, and other various above ground and underground products. Concrete arrives on site wet, which is then poured into precast forms, dried, and stored on site as finished product.

After the opening conference, inspectors then walked the facility and first observed the maintenance shop (photos 50 and 51) where Dura-Crete trucks and equipment receive maintenance. The drain inside of the maintenance shop flows to a grease trap where grease is separated from other fluids and then discharged to the sanitary sewer. According to facility representatives, the grease trap is cleaned out about two to three times each year. Inspectors then proceeded to walk the outdoor portion of the site and observed several catch basins located throughout the site that receive stormwater runoff and get pumped out on an as-needed basis by a third-party which disposes of the liquids offsite (photos 52, 55, 56, and 63). These catch basins do not discharge to the storm drains. Inspectors also observed oil and other liquids/materials stored on site (photos 53 and 59). There is a 7,000-gallon diesel fueling tank located within the northern portion of the facility used to fuel equipment and machinery on site (photo 54). Casting activities occur within the center of the site where concrete is poured into precast molds and left to dry (photo 57). Inspectors observed two washout pits for the interior of the concrete trucks, and for equipment used in the casting process (photos 58 and 61). There is also salt storage on site (photo 60). Inspectors observed several oil sheens throughout the site as well (photos 56 and 62).

After the inspection of the facility, the inspectors returned to the main office and held a closing conference with Chris and Brittney McKean where they discussed observations.

Observations, Corrective Actions, and Recommendations

Observation 1: Dura-Crete, Inc. is an industrial facility under industrial stormwater Sector E: Glass, Clay, Cement, Concrete, and Gypsum Product Manufacturing Facilities, operating without industrial stormwater permit coverage or a No-Discharge Certification.

The facility's primary SIC code is 3272 (Concrete Products, Except Block and Brick), which falls under industrial stormwater Sector E: Glass, Clay, Cement, Concrete, and Gypsum Product Manufacturing Facilities, requiring industrial stormwater permit coverage. The facility has outdoor industrial operations/activities (photos 57, 58 and 61) as well as outdoor storage of materials (photos 55-61 and 63). The inspectors observed several stormwater catch basins at the facility during the inspection (photos 52, 55, 56, and 63). Inspectors observed several oil sheens throughout the site as well (photos 56 and 62).

Regulatory Information:

In 1987, the US Congress amended the Clean Water Act to expressly include stormwater discharges from industrial activities as requiring Clean Water Act controls. In 1990, EPA issued regulations that require specific industrial activities to obtain permits in order to discharge stormwater from their facilities under 40 C.F.R. 122.26. The Division of Water Quality of the Utah Department of

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Observations, Corrective Actions, and Recommendations

Environmental Quality has direction and authority to administer stormwater permitting in Utah through the Utah Water Quality Act, and its implementing regulations and permits.

In accordance with the Utah Water Quality Act, Title 19, Chapter 5, Utah Code Annotated 2004 and the Utah Pollutant Discharge Elimination System (UPDES) Regulations, UPDES discharge permit coverage is required for stormwater discharges from specific industrial activities to surface waters of the State. Facilities engaged in glass, clay, cement, concrete, and gypsum product manufacturing (Standard Industrial Classification (SIC) codes 3211, 3221, 3229, 3231, 3241, 3251-3259, 3261-3269, 3271-3275, 3281, and 3291-3299) as the primary industrial activity, are specifically required to obtain permit coverage, or a No-Exposure Certification, or a No-Discharge Certification, for discharges of stormwater associated with industrial activities from the facility to surface waters of the State.

A No-Exposure Certification may be obtained for facilities where all industrial materials and activities are protected by a storm-resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. A No-Discharge Certification may be obtained for facilities with a SIC code that requires coverage but do not discharge to surface water or groundwater. Due to the facility-wide containment of stormwater runoff within the catch basins, Dura-Crete, Inc. may qualify for a No-Discharge Certification.

Corrective Action:

Within 30 days of receipt of this report, either submit a Notice of Intent (NOI) for the UPDES Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity (UTR000000) or a No-Discharge Certification Form. See the attached NOI and No-Discharge Certification Forms. Prior to submitting an NOI or No-Discharge Certification, please coordinate with Jordan Bryant with DWQ at jtbyrant@utah.gov.

Observation 2: There were oil sheens observed (photos 56 and 62).

Inspectors observed several oil sheens in various locations throughout the facility.

Recommendation: Ensure oil sheens are cleaned up throughout the facility using absorbent material.

Observation 3: There was no spill kit located near the fueling tank (photo 54).

Inspectors observed the 7,000-gallon diesel fuel tank located along the northern half of the facility did not have a spill kit nearby.

Recommendation: Place a spill kit containing absorbent materials near the fueling tank. If a spill were to occur, the spill kit should be easily accessible for immediate cleanup.

Finding 4: Totes were stored outdoors not within secondary containment (photo 59).

Inspectors observed totes containing oil and hydraulic fluid stored outdoors not within secondary containment.

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Observations, Corrective Actions, and Recommendations
<u>Recommendation:</u> Either ensure totes containing materials/liquids are stored over secondary containment or are stored indoors/under cover.