

INSPECTION REPORT

Inspection Entry Date/Time	April 10, 2025, 11:40 a.m. (EST)	Announced: No	
Inspection Exit Date/Time	April 10, 2025, 04:08 p.m. (EST)	Access: Granted	
Weather	Cloudy		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, National Pollutant Discharge Elimination System (NPDES) permit program		
Type of Inspection	Industrial Stormwater Inspection (ISI)		
Permittee Name	Kuhlman Corporation		
Facility or Site Name	Kuhlman Corporation Yard #1		
Facility/Site Physical Address	444 Kuhlman Yard One		
City, State, Zip Code	Toledo, Ohio 43609		
County/Borough/Parish	Lucas		
Facility GPS Coordinates			
Mailing Address (If different)	JIsabell@kuhlman-corp.com		
FRS ID			
Permit Number(s) (If Applicable)	OHU000056		
SIC and/or NAICS	2041		
Lead Inspector:			
William Jones	WILLIAM JONES		Digitally signed by WILLIAM JONES Date: 2025.05.27 14:05:37 -05'00'
	EPA REGION 5	Jones.William@epa.gov	(312) 886-6058
Supervisor Review:			
Molly Smith	MOLLY SMITH		Digitally signed by MOLLY SMITH Date: 2025.05.27 13:27:05 -05'00'
	EPA REGION 5	Smith.Molly@epa.gov	

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

EPA Region 5 Lead Inspector, William Jones, arrived at Kuhlman Corporation Yard one (the “Site” or “Facility”), located at the address listed above which is located close to the Maumee River in Toledo, Ohio at 11:40 a.m. EST on April 10, 2025, for an unannounced inspection. EPA Region 5 Lead Inspector presented credentials to Joe Isabell and informed him that this was an EPA Region 5 inspection to investigate compliance with their industrial storm water permit. This is authorized by Clean Water Act (CWA) Section 308 and implementing regulations. This report is based on information supplied by Kuhlman Corporation\Gerken Materials Inc. representatives,

direct observations made by EPA Region 5 inspectors, records and reports maintained by the permittee and other information including: photographs taken by EPA Region 5 inspectors, verbal or written statements made by information supplied by Kuhlman Corporation\Gerken Materials Inc. representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA Region 5 inspectors by Kuhlman Corporation\Gerken Materials, Inc. representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or after the Inspection from a review of US Environmental Protection Agency (EPA), state, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 5	William Jones	Lead Inspector	Yes	Yes
EPA Region 5	Jeremy Leggett	Physical Scientist	Yes	Yes
Kuhlman Corporation	Joe Isabell	Director of Concrete Operations	Yes	Yes
Gerken Materials Inc.	David Benecke	Environmental Manager	Yes	Yes

Facility/Site Description

EPA Region 5 lead inspector confirmed the following facility information:

Kuhlman Corporation is a wholly owned subsidiary of Gerken Companies and was acquired in 2021. Kuhlman Corporation Yard #1 (Kuhlman) is a ready-mix plant that produces ready mix concrete for residential, highway and commercial use. They have approximately 15 trucks, bulk piles of sand and aggregates at the facility. Midwest Terminals, which is not part of Gerken Companies, owns the area along the Maumee River, the Bulk Storage Barn and another building south-east of the Kuhlman maintenance garage. Joe Isabell stated that Midwest terminals owns the outfalls. Mr. Isabell stated that the aggregate piles are natural sand from Michigan and that all the materials, except cement powder, is transported in by truck. The facility uses the aggregate to produce ready mix concrete for commercial, residential, and highway use. David Benecke applied for coverage under General Permit OHR000007 for Kuhlman Corporation Yard #1 on September 1, 2022. On November 30, 2022, the Ohio Environmental Protection Agency approved coverage for Kuhlman Yard #1, effective December 1, 2022, and expiring May 31, 2027.

Facility/Site Information

Location(s)

Location/Area/Sub-area	Description
Storage bunkers	Area where storm sewer inlet is receiving runoff by storage bunkers
Area on east side of storage piles	Area where storage piles are on east side of site
Truck wash station	Manhole by truck wash station
Ramp to scale	Manhole by ramp to scale
Manhole near facility entrance	Manhole with wood debris on top of manhole
Lab area	Lab area with manhole and sandbags

SECTION II – OBSERVATIONS

Location: Office document review		
Observation #: WJ1-OB-001	Date: April 10, 2025	Weather: Cloudy with recent rain
EPA obtained a copy of the Storm Water Pollution Plan (SWPPP) on site. It was dated March 2021. See Appendix 3. In the SWPP provided to EPA, a drawing of the facility was included and highlighted with green marker to show approximate property locations and illustrates how the Kuhlman property is located between the Midwest Terminal property and the Anderson property. Mr. Isabell's says the facility maintenance staff does the visual inspections monthly on the inlet filters. Mr. Isabel also stated the facility is swept weekly on Tuesdays and Thursdays.		
Location: Storage bunkers		
Observation #: WJ1-OB-002	Date: April 10, 2025	Weather: Cloudy with recent rain
During the inspection, EPA observed runoff from storage bunkers. The runoff was flowing to the storm drain inlet in the photograph.		
Photos 1 to 3		
Location: Area on east side of storage piles		
Observation #: WJ1-OB-003	Date: April 10, 2025	Weather: Cloudy with recent rain
During the inspection, EPA observed an area to the east of the storage piles where storm water can flow through a conveyance to the edge of the property leading to the Maumee River.		
Photo 4		
Location: Truck washout station		
Observation #: WJ1-OB-004	Date: April 10, 2025	Weather: Cloudy with recent rain
During the inspection, EPA observed a manhole. Near the manhole was ponded water that was grayish in color. This was also present on top of the storm water manhole lid.		
Photo 5		
Location: Ramp to Scale		
Observation #: WJ1-OB-005	Date: April 10, 2025	Weather: Cloudy with recent rain
EPA observed a manhole near the scale with a control device that was full of sediment.		

Photos 6 to 7

Location: Manhole near facility entrance**Observation #:** WJ1-OB-006**Date:** April 10, 2025**Weather:** Cloudy with recent rain

EPA observed a manhole near the facility entrance that had scrap bits of wood material on top of it.

Photo 8

Location: Lab area**Observation #:** WJ1-OB-007**Date:** April 10, 2025**Weather:** Cloudy with recent rain

EPA observed a manhole near the facility's lab that was partially surrounded by sandbags. Loose material was seen on the downslope edges of the sandbags and one of the sandbags had ripped open. Mr. Benecke noted that the staff tests new concrete mixes inside the lab and wash it out upslope of the bags and then it drains to the storm sewer.

Photos 9 to 11

SECTION III – RECORDS REVIEW

Records may not be in sequential order

Record: Storm Water Pollution Prevention Plan**AOC:** Yes**Ref #:** WJ1-RR-001**Reviewed By:** William Jones**Reviewed Date:** April 10, 2025

The SWPPP was dated from before the issuance of the current permit cycle. Facility staff said that they were in the middle of updating it. One issue the facility stated was where they facility should sample, since the facility does not own the outfalls. Mr. Benecke also said that there is historic contamination under the property. so the facility cannot dig down more than two feet unless they store and test the soil and water to see how to dispose of it. It is a risk mitigation plan. The facility spoke with Lashana Weeks, City of Toledo, in the past and said she is checking on the sampling locations. EPA reviewed the sampling reports since April 2020. David Benecke said the last time they had access to the outfalls was in 2022 or early 2023. The City of Toledo inspected the site about a year ago.

The following sections of the SWPPP were not reflective of current conditions:

1. References through the SWPPP appear to be from the 2017 NPDES Permit.
 - Section 1.6 described the site as receiving rock salt, oats, canola pellets, cotton seed, distillers' grain, urea, potash and other fertilizers, and aluminium briquettes. This did not match with what facility staff stated about the site during the inspection, nor what was observed during the inspection.
 - Section 1.8 contained an inaccurate map, due to the site sale.
 - Section 2.0 describes a salt pile that was not observed during the inspection or noted on the site maps.
 - Section 2.2 and 2.4 lists areas no longer owned by Kuhlman. Other sections in the permit following this appear to be based on the 2017 permit.
 - Most of the appendices are missing content. The maps are not up to date.

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION V - AREAS OF CONCERN

See below for areas of concern related to the current industrial storm water General Permit OHR000007:

- Part 2.1.2.1 requires “You shall minimize exposure of manufacturing processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance and fueling operations) to rain, snow snowmelt, and runoff by either relocating these industrial materials and activities inside or protecting them with storm resistant coverings (although significant enlargement of impervious surface area is not recommended)...”

There are material storage areas where the exposure of materials is not minimized. See photographs.

- Section 2.1.2.3 of the permit requires Maintenance. “You shall maintain all control measures that are used to achieve the control measures/best management practices (BMPs) and numeric effluent limits required by this permit in effective operating condition. Nonstructural control measures shall also be diligently maintained (e.g., spill response supplies available, personnel appropriately trained). If you find that your control measures need to be replaced or repaired, you shall make the necessary repairs or modifications as expeditiously as practicable.”

EPA noted inlet filters were not cleaned, nor was housekeeping maintained.

- Section 2.1.2.10 “You shall eliminate non-stormwater discharges not authorized by an NPDES permit”

Pursuant to Section 1.1.3 of the General Permit, non-stormwater discharges, do not include releases of test concrete from the facility lab near the sandbagged storm drain inlet.

- Part 5. “If you prepared a SWPPP for coverage under a previous NPDES permit, you shall review and update the SWPPP to implement all provision of this permit within 180 days after the effective date of this permit.” The permit was effective December 1, 2022.

SWPPP is dated March 2021. There is an outfall by the stockpile yard with raw materials that does not appear to be included.

- Part 6.1.1 of OHR000007 requires “Applicable monitoring requirements apply to each outfall...For monitoring purposes, an outfall can include a discrete conveyance (i.e. pipe, ditch, channel, tunnel or conduit) or a location where sheet flow leaves your facility’s property...”

Sampling is not being done at the outfalls. The facility is unclear where sampling should be done, since the dock area belongs to Midwest Terminal. The General Permit defines what an outfall can include and describes conducting representative monitoring.

See above observations in section II and III related to the Areas of Concern.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP**Closing Conference**

The EPA REGION 5 Lead Inspector held a closing conference with Facility personnel on April 10, 2025, for the inspection. During the closing conference, EPA REGION 5 Lead Inspector discussed the observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

William Jones, along with Jeremy Leggett, Joe Isabell, and David Benecke, were present for the closing conference. Mr. Jones shared that the observations and Areas of Concern were preliminary. Mr. Jones confirmed that no information gathered was considered Confidential Business Information. During the closing conference, David Benecke stated the facility has an issue with dust blowing from Midwest Terminal. Mr. Jones then relayed the following preliminary observations to the facility representatives:

- SWPPP and map are out of date;
- Sampling is not being done at the outfalls;
- Inlet filters were not being maintained;
- Outfall, by the stockpile yard, with raw materials;
- Housekeeping concerns with grain along the dock area;
- Discharge points that are not included in the SWPPP;
- Storm drain with ripped sandbags, and close proximity to where the lab dumps out test concrete; and
- Housekeeping issues with dust throughout the facility.

Follow Up

No information was requested by the inspector after the inspection.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log
3. Two drawings of Kuhlman Yard 1:
 - a. Aerial Photograph
 - b. Hand Drawing

APPENDIX 1: PHOTO LOG



Photograph 1. Runoff from the direction of the piles into the storm drain inlet at Kuhlman Corporation yard #1. Uncovered storage piles can be seen at the top of the photograph			IMGP0001.JPG
April 10, 2025/1:06 p.m.		No PII	Photographer: William Jones
Kuhlman Yard one			
Southeasterly			



Photograph 2. Closeup view of manhole shown in photograph 1. Inlet protection can be seen inside the manhole. The inlet protection is full to the top of the container with sediment.			IMGP0002.JPG
April 10, 2025/1:07 p.m.		No PII	Photographer: William Jones
Kuhlman yard one			
Camera Direction: down			



Photo 3. Closeup view of manhole shown in photographs 1 and 2. Inlet protection can be seen inside the manhole. The inlet protection is full to the top with sediment.			IMGP0003.JPG
April 10, 2025/1:07 p.m.		No PII	Photographer: William Jones
Kuhlman Yard One			
Camera Direction: Down			



Photograph 4. Area on east portion of site by uncovered storage piles showing the direction water flows when it runs off towards the Maumee River. This is near where the stacker ring is show on the attached drawing.			IMGP0004.JPG
April 10, 2025/1:14 p.m.		No PII	Photographer: William Jones
Kuhlman Corporation Yard #1			
Camera Direction: East flow channel passing between the trees to Maumee River			



Photo 5. Manhole by truck washout station			IMGP0005.JPG
April 10, 2025/1:27 p.m.		No PII	Photographer: William Jones
Kuhlman Corporation yard #1			
View looking Easterly			



Photograph 6. Manhole on site near ramp to scale. Sediment can be seen along side the ramp wall near the top of the photograph.			IMGP0006.JPG
April 10, 2025/1:35 p.m.		No PII	Photographer: William Jones
Kuhlman Corporatoin Yard #1			



Photograph 7. Close up of manhole on site near ramp to scale. This is also show in photo 6. Inlet protection appears to be full of sediment to the top of the container.			IMGP0007.JPG
April 10, 2025/1:35 p.m.		No PII	Photographer: William Jones
Kuhlman Corporation Yard #1			
View looking down			



Photograph 8. Inlet near entrance to facility. Wood debris have accumulated on top of the inlet.			IMGP0008.JPG
April 10, 2025/1:38 p.m.		No PII	Photographer: William Jones
Kuhlman Corporation Yard #1			
View looking down			



Photograph 9. Manhole with laboratory concrete washout area above it and sand bags between it. Concrete is dumped between the sandbags and the building after the lab tests it. Staining can be seen on the ground between the sand bags and the inlet. This area is also shown in photographs 10 and 11.			IMGP009.JPG
April 10, 2025/1:47 p.m.		No PII	Photographer: William Jones
Kuhlman Corporation Yard #1			
View looking Northeasterly.			



Photograph 10. Laboratory concrete washout area between the building and sandbags. Concrete is dumped between the sandbags and the building after the lab tests it. This is also shown in photograph 9 and 11.			IMGP0010.JPG
April 10, 2025/1:48 p.m.		No PII	Photographer: William Jones
Kuhlman Corporation Yard #1			
Easterly			



Photograph 11. Laboratory concrete washout area between the building and sandbags. Concrete is dumped between the sandbags and the building after the lab tests it. Staining can be seen on the ground between the sandbags and the storm drain inlet. This is also shown in photograph 9 and 10.			IMGP0011.JPG
April 10, 2025/1:48 p.m.		No PII	Photographer: William Jones
Kuhlman Corporation Yard #1			
View looking easterly			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Date Received
Report	SWPPP	No	No	4-10-25
Aerial photo/drawing	Kuhlman Yard 1 storm sewers with image	No	No	4-10-25
Drawing	Kuhlman Yard 1 marked with approximate property lines	No	No	4-10-25

APPENDIX 3: SWPPP, Storm sewer drawing and storm sewer drawing with aerial photograph