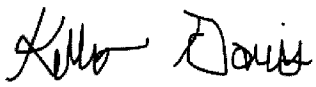
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1, ECAD-WCB
5 Post Office Square - Suite 100, Boston, MA 02109-3912

Clean Water Act (CWA) Inspection Report

Program: Industrial Stormwater	**Inspection Type:** Compliance Evaluation Inspection (CEI)	
Operator Name: Lehigh Hanson Heidelberg Materials	**NPDES/ICIS No.:** (Unpermitted at time of inspection)	
Inspection Entry Date: November 2, 2022 **Inspection Entry Time:** 12:55 PM (EDT)	**Inspection Exit Date:** November 2, 2022 **Inspection Exit Time:** 1:40 PM (EDT)	
Facility Inspected: Lehigh Hanson Heidelberg Materials 21 Wilbraham St, Palmer, MA, 01069	**Lat, Long:** 42.167077, -72.348937 **NAICS / SIC Code:** 5032 – Brick, Stone, and Related Construction Materials, "Wholesale Trade" Division	
EPA Representative(s): Abraham Elmir – EPA Region 1 Life Scientist, (617) 918-1583, elmir.abraham@epa.gov		
State Representative(s): None.		
On-site Facility Representative(s): James O'Neill, Manager/General Supervisor, (413) 283-2904, james.oneill@lehighhanson.com		
Responsible Official: James O'Neill, Manager/General Supervisor		
Name and Signature of Inspector Kelly Davis – Contract Inspector, ERG 	**Phone Number/Email** (703) 633-1646 kelly.davis@erg.com	**Date:** 12/20/2022

INTRODUCTION:

On November 2, 2022, staff from U.S. Environmental Protection Agency (EPA) Region 1 and EPA's contractor, ERG, (collectively, the EPA Inspection Team) conducted an Industrial Stormwater Non-Filer Inspection at Lehigh Hanson Heidelberg Materials located on Wilbraham St, in Palmer, Massachusetts, Hampden County (Facility). Ms. Kelly Davis (ERG) presented her Clean Water Act (CWA) inspector credentials to the Facility's Manager/General Supervisor, Mr. James O'Neill, upon arrival and conducted an opening conference.

The EPA Inspection Team explained the purpose of the CEI was to assess the Facility's compliance status with respect to EPA's 2021 Industrial Stormwater Multi-Sector General Permit (MSGP). At the time of the inspection, the Facility did not have coverage under the current MSGP. The Facility representative stated the Facility had not received previous outreach materials or correspondence on MSGP requirements and had not individually been notified by EPA that it is subject to stormwater requirements.

Weather conditions at the time of the inspection were sunny and 65°F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA), the closest precipitation monitoring station in the town of Warren area received approximately 0.06 inches of rainfall the day before the inspection.

ATTACHMENTS:

Appendix A – Photograph Log

FINDINGS AND OBSERVATIONS:

Facility Description

The Facility, owned by Lehigh Hanson Heidelberg Materials, is a bulk cement distribution site. At the beginning of the inspection, the Facility representative stated he wasn't aware of the Facility's Standard Industrial Classification (SIC) code. During the conclusion of the inspection, he stated he found documentation that stated the Facility is primarily engaged in industrial activity classified under SIC code 3241 (Hydraulic Cement), although he stated he would verify with his supervisors. After the inspection, on November 2, 2022, the Facility representative emailed Ms. Kelly Davis and stated the Facility is primarily engaged in industrial activity classified under SIC Code 5032 (Brick, Stone, and Related Construction Materials). According to the Facility representative, the Facility began operations at this location in 1986 and, at the time of the inspection, had a full-time staff of two (2).

The Facility comprises approximately one acre located on Wilbraham Street in the City of Palmer, Hampden County, Massachusetts. The Facility is bordered by commercial facilities to the east and south and a forested area to the north and west. The Facility has one building where bulk cement is stored in towers, cement is offloaded into trucks by the truckload, and a Facility vehicle is stored, fueled, and maintained. The Facility also includes an uncovered unloading area on the Facility's northeast perimeter where cement is unloaded from rail cars. A 250-gallon diesel aboveground storage tank (AST) is located inside the covered loading dock.

Facility Drainage Systems and Discharges

The Facility grounds are 100% impervious, paved with asphalt, thereby creating an impervious surface for stormwater runoff. The Facility representative estimated that stormwater flows to the Facility's northwest corner and discharges to a forested area. The receiving water, Quabaog River, is approximately 700 feet from the Facility's northwest corner. The EPA Inspection Team observed that stormwater would flow northwest through the forested area to reach Quabaog River. During the inspection, the EPA Inspection Team did not observe a drainage channel or other concentrated flow path from the Facility to the river.

Observations

The EPA Inspection Team observed the Facility entrance/exit at the south perimeter of the Facility (refer to Appendix A, Photograph 1). The driveway appeared clean and free of debris.

The EPA Inspection Team observed the garage in the Facility's west area (refer to Appendix A, Photograph 1). The garage held one vehicle, a vehicle used to move rail cars. The Facility representative stated minor vehicle maintenance, such as fluid changes, occur in the garage. The EPA Inspection Team did not observe floor drains in the garage.

The EPA Inspection Team observed the Facility's northwest paved area and the northwest corner where stormwater discharges (refer to Appendix A, Photographs 2 and 3). The pavement and discharge point appeared clean and free of debris. A covered dumpster was located adjacent to the stormwater discharge location.

The EPA Inspection Team observed the uncovered unloading area at the Facility's northeast perimeter where cement powder is transferred from rail cars to the storage tower (refer to Appendix A, Photographs 4 and 5). The unloading area appeared clean and free of debris.

The EPA Inspection Team observed the forested area northwest of the Facility discharge point and did not observe evidence of flow from the Facility to Quabaog River (refer to Appendix A, Photographs 6 and 7). Stormwater was not discharging from the Facility during the inspection.

The EPA Inspection Team observed the covered loading dock where bulk cement is transferred from the storage tower to customer trucks (refer to Appendix A, Photographs 4 and 8). The Facility maintained a 250-gallon diesel AST inside the loading dock (refer to Appendix A, Photograph 9). A spill kit was present next to the AST and the EPA Inspection Team did not observe spills or stains around the AST.

AREAS OF CONCERN:

At the time of the inspection, the EPA Inspection Team identified the following at the Facility:

a. The Facility did not have coverage under the 2021 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities.
b. During the inspection, the Facility representative stated the Facility is primarily engaged in industrial activity classified under SIC code 3241 (Hydraulic Cement) that is regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity. After the inspection, on November 2, 2022, the Facility representative stated the Facility is actually primarily engaged in industrial activity classified under SIC Code 5032 (Brick, Stone, and Related Construction Materials), an industry not regulated under 40 C.F.R. § 122.26.
c. The EPA Inspection Team observed outdoor industrial activities of unloading cement from rail cars to the storage tower at the northeast perimeter.
d. As stated in the Facility Drainage Systems and Discharges section of this report, stormwater from the Facility discharges from the Facility's northwest perimeter. The Quaboag River, the closest identified receiving water, is approximately 700 feet from the Facility's northwest perimeter.

CLOSING:

At the conclusion of the inspection, the EPA Inspection Team held a closing conference with the Facility representative and discussed the observations of the inspection. The EPA Inspection Team reiterated that all observations were preliminary and not compliance determinations. The closing conference began at 1:35 PM (EDT) and concluded at approximately 1:40 PM (EDT).