EPA Region 10 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Entry Date/Time	05/01/2023 09:00 AM (PT)
Inspection Exit Date/Time	05/01/2023 02:40 PM (PT)
Weather	50°, Overcast
Media	Water
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial
Type of Inspection	Compliance Evaluation Inspection
Permittee Name	Interstate Concrete & Asphalt
Site Name	Interstate Concrete & Asphalt – Pendleton Interstate Concrete & Asphalt - Grubbs
Site Physical Address	Emigrant Road, County Road 937
City, State, Zip Code	Pendleton, OR 97801
County	Umatilla
Facility GPS Coordinates	Pendleton – 45.671760, -118.729524 Grubbs – 45.623354, -118.627895
Mailing Address	P.O. Box 3366
City, State, Zip Code	Spokane, Washington 99220
FRS ID	ORT9756163775
Permit Numbers	Pendleton – ORR05IA01 Grubbs – ORR05IA00
SIC	3273 (Ready mix concrete mfg) – Pendleton 1429 (Other crushed & broken stone mining & quarrying (pt)) – Grubbs

Lead Inspector:

RAYMOND ANDREWS Digitally signed by RAYMOND ANDREWS Date: 2024.07.02 15:01:40 -07'00'

Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252

Supervisor Review:

PETER CONTRERAS Digitally signed by PETER CONTRERAS Date: 2024.07.02 17:09:09 -07'00'

Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the Interstate Concrete & Asphalt - Pendleton (the "Site" or "Facility"), located on Emigrant Road, County Road 937, Pendleton, Oregon, at 09:00 AM (PT) on 05/01/2024 for an announced inspection. I was accompanied by Emily Siangkam, an Inspector in Training, who was there to observe inspection procedures. I presented my credentials to Steven Warnock and informed him I was there to determine compliance with the Clean Water Act (CWA), and the facility's Oregon Muli-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity, permit numbers, ORR05IA01 (Pendleton Site) and ORR05IA00 (Grubbs Site). This report is based on information supplied by Mr. Warnock, direct observations made by me and Ms. Siangkam, and/or a review of records and reports maintained by the facility. In addition, information gathered either prior to or after the Inspection from a review of EPA, State, and/or public records may be included in this report.

American Rock Products, the sites' operator, is a subsidiary of CRH, a publicly traded company.

This is a combined report for the primary site (Pendleton) and the quarry site (Grubbs).

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
EPA Region 10	Emily Siangkam	Inspector	Yes	Yes
American Rock Products	Steve Warnock	Site Manager	Yes	Yes
ARH America's Materials	Garrett Sullivan	Senior Environmental Specialist	Yes	Yes

Site Information

Responsible official	Steven Warnock; steve.warnock@americanrockproducts.com
Personnel conducting inspections/sampling	Mr. Warnock conducts sampling, monitoring, and the annual SWPPP training for employees.
Sampling locations	One at each location, monitoring monthly but report quarterly
Years in operation	American, Rock Products, a subsidiary of CRH, has been operating the site since 2019; however, the site has been used for much longer, but the exact start date is unknown.
Number of employees	The sites average a combined 7 – 10 employees. The primary production site (Pendleton) operates from 7:00am until 3:00pm Monday through Friday. The excavation site (Grubbs) operates when the primary site needs additional gravel for operations.
Receiving Water	Umatilla River
Number/location of Stormwater Outfalls	There is one outfall at each site, but the sites are graded and bermed to maintain stormwater on-site.
BMPs/Stormwater Treatment	The sites do not treat stormwater. Most water infiltrates. Berms and grading are used to keep stormwater on-site. Water from truck washing is contained in an adjacent sump and retention pond.

Industrial activities exposed to stormwater	Gravel crushing and washing is exposed to stormwater. The hot mix asphalt and ready-mix production machines equipment is also exposed to stormwater.
Industrial Sector	Sector J: Mineral Mining and Dressing
Type of Operation	The sites produce asphalt and concrete mix.
Is property owned or leased?	The sites are primarily owned; however, a small portion of land is leased from the Umatilla tribe.
Size of Facility	34.75 acres - Pendleton site, 35 acres - Grubbs site
Is the SWPPP team present	Mr. Warnock and Mr. Sullivan are members of the SWPPP team. The SWPPP team is designated by position.
Type of materials and/or vehicles stored outdoors	The site stores input material such as gravel and aggregate outdoors, as well as packaged Ready Mix concrete product. The site also stores heavy equipment such as dump trucks and bucket loaders outdoors.
What parameters is the facility monitoring?	The facility monitors for total suspended solids (TSS), pH, and Nitrates/Nitrites. Samples are sent to a contract lab for analysis when there is a discharge. The only parameter the site analyzes is pH.
What is the facility's monitoring frequency?	The sites monitor monthly.

SECTION II – Observations

No Observations were made that constitute an Area of Concern.

SECTION III – Records Review

Records may not be in sequential order

Record: Other - Facility Quarterly Visual Inspection Reports		**AOC:** No
Ref #: RA1-RR-005	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 05/01/2024
At the time of inspection, I reviewed Quarterly Visual Inspection (QVI) Reports for 2022 and 2023 for both the Grubbs (ORR05IA00) and Pendleton (ORR05IA01) sites. I did not note any areas of concern.		
Record: Annual Reports		**AOC:** No
Ref #: RA1-RR-004	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 05/01/2024
At the time of inspection, I reviewed the 2022 and 2023 Annual Reports for both the Grubbs (ORR05IA00) and Pendleton (ORR05IA01) sites. I did not note any areas of concern.		
Record: Other - Monthly Site Inspection Reports		**AOC:** No
Ref #: RA1-RR-003	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 05/01/2024
At the time of the inspection, I reviewed monthly site inspection reports from January 2022 through December 2023 for both the Grubbs (ORR05IA00) and Pendleton (ORR05IA01) sites. The inspection reports appear complete and include the items required by the permit. I did not note any areas of concern.		
Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		**AOC:** No
Ref #: RA1-RR-002	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 05/01/2024
At the time of inspection, I reviewed information in EPA's ICIS database from June 2019 through May 2024 for both the Grubbs (ORR05IA00) and Pendleton (ORR05IA01) sites. I did not note any areas of concern.		

Record: SWPPP		**AOC:** Yes
Ref #: RA1-RR-001	**Reviewed By:** Raymond Andrews	**Reviewed Date:** 05/01/2024

At the time of the inspection, I reviewed the facility's Stormwater Pollution Control Plans (SWPPPs) for both the Grubbs (ORR05IA00) and Pendleton (ORR05IA01) sites, both dated June 1, 2021.

Pendleton

The SWPPP for the Pendleton site indicates the site conducts impaired water monitoring but does not give specifics of monitoring procedures or timelines. Attachments listed in the body of the SWPPP were not included in the SWPPP binder. The SWPPP listed the incorrect number for the National Response Center.

The Pendleton SWPPP was missing the following items:

1. SWPPP Certification signature
2. Employee Training records
3. Legible Site map - The text on the site map is too small to read so it's not possible to determine if it has all the elements required by the permit. The General Location map was adequate.

Grubbs

The SWPPP for the Grubbs site indicates the site conducts impaired water monitoring but does not give specifics of monitoring procedures or timelines. The SWPPP listed the incorrect number for the National Response Center and listed numbers for the Idaho Department of Environmental Quality (IDEQ) but not the Oregon Department of Environmental Quality (ODEQ) even though the site is in Oregon.

The Grubbs SWPPP was missing the following

1. SWPPP Certification signature
2. Stormwater Control Measures (SCMs)
3. Employee Training records

SECTION IV – Sampling Activity

No sampling was conducted.

SECTION V – Areas of Concern

Areas of Concern may not be in sequential order.
The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-001	**Records Review: SWPPP**
Permit Requirement Permit Part 6.2.7 states, "Signature Requirements. You must sign and date your SWPPP in accordance with Appendix B, Subsection 11."	
AOC: Both the Pendleton and Grubbs site SWPPPs was missing the SWPPP Certification signature.	

AOC Reference #: RA1-RR-001	**Records Review: SWPPP**
Permit Requirement Permit Part 6.2.5.1.e.iv of the permit states, in part, "You must document the following in your SWPPP...A log of the dates on which specific employees received training."	
AOC: Both the Pendleton and Grubbs site SWPPPs were missing Employee Training documentation.	

AOC Reference #: RA1-RR-001	Records Review: SWPPP
Permit Requirement Permit part 6.2.2.3 of the permit states, in part, "Your SWPPP must include the following...Site map. Provide a map showing..."	
AOC: The Pendleton SWPPP site map was illegible. The text on the site map is too small to read so it's not possible to determine if it has all the elements required by the permit.	

AOC Reference #: RA1-RR-001	Records Review: SWPPP
Permit Requirement Part 6.2.4 of the permit states, in part, "Description of Stormwater Control Measures to Meet Technology-Based and Water Quality-Based Effluent Limits. You must document the location and type of stormwater control measures you have specifically chosen and/or designed..."	
AOC: The Grubbs site SWPPP did not include Stormwater Control Measures (SCMs).	

AOC Reference #: RR-001	Records Review: SWPPP
Permit Requirement Table 8.J-1 of the permit shows the sites in Subsector J must conduct indicator monitoring for Polycyclic Aromatic Hydrocarbons (PAHs).	
AOC: Mr. Garrett stated the site is supposed to be conducting PAH monitoring; however, there was no mention of indicator monitoring in the SWPPP.	

SECTION VI – Closing Conference

I held a closing conference with facility personnel at 02:15 PM (PT) on 05/01/2024 for the inspection. During the closing conference, I discussed my observations and the Areas of Concern I identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – List of Appendices

1. Photo Log

APPENDIX 1: Photo Log

All photos were taken by Lead EPA Inspector, Ray Andrews, during the inspection.

Photos were not manipulated beyond minor cropping for sizing and labels or callouts to draw attention to the subject of the photo.

All photos taken during the inspection are included in the Photo Log; however, only photos that support an Area of Concern are included in the inspection report.

Pendleton

- P1010918 – Site Map
- P1010919 – Sign at Facility Entrance
- P1010920 – Sump for Truck Wash
- P1010921 – Truck Wash
- P1010922 – Retention Pond for Truck Wash Sump Overflow
- P1010923 – Aggregate Gravel Pile
- P1010924 – Gravel Piles and Working Road
- P1010925 – Gravel Wash
- P1010926 – Interior Gravel Berm Approximately 50 feet from Exterior Berm
- P1010927 – Exterior Berm Adjacent to River

Grubbs

- P1010928 – Gravel-Lined Pit