

REPORT OF COMPLIANCE EVALUATION INSPECTION
(INDUSTRIAL STORMWATER)

NEBCO Inc. dba Husker Ready Mix Concrete
201 S. 1st Street
Lincoln, Nebraska 68508

Authorization Number: **ISW-202200648**

BY
U.S. ENVIRONMENTAL PROTECTION AGENCY REGION 7
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)
WATER BRANCH/DRINKING WATER & INSPECTIONS SECTION (WB/DWIS)

ON
August 1 and 5, 2024

Introduction

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Compliance Evaluation Inspection (Industrial Stormwater) was conducted on August 1, 2024, at the Husker Ready Mix Concrete Plant in Lincoln, Nebraska. The inspection was conducted under the authority of Section 308 of the Clean Water Act, as amended. It was conducted in accordance with the U.S. Environmental Protection Agency (EPA) Region 7 Standard Operating Procedures for Compliance Inspections (ENST SOP No. 2332). This narrative report presents the findings of the inspection. Randol Wehrbein with the Nebraska Department of Environment and Energy was present during the inspection.

Participants

NEBCO Inc. dba Husker Ready Mix Concrete

- James Hamlette, Vice President/ General Manager Jamesh@readymixedlincoln.com
- Jen Koenig, Environmental Technician jenk@nebcoinc.com
- Joel Woita, Safety Director joelw@nebcoinc.com
- Russell George, Safety/Environmental Coordinator RussellG@nebcoinc.com
- Jeff Dieckgrafe, Plant Manager
- Linzy Johns, Operations Manager

Nebraska Department of Environment and Energy-NPDES Compliance Section

- Randol Wehrbein, Environmental Specialist Randol.Wehrbein@nebraska.gov

U.S. Environmental Protection Agency (EPA), Region 7

- Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS Ahmad.Naji@epa.gov

Inspection Procedures

Mr. Randol Wehrbein and I arrived at the Husker Ready Mix plant in Lincoln, Nebraska, on August 1, 2024, at 9:00 AM. We met with plants operators. We introduced ourselves and I presented my credentials. I explained the purpose and procedures of the industrial stormwater compliance evaluation inspection. These included completing the Region 7 Industrial Stormwater Worksheet (Attachment 1) and the U.S. EPA Confidentiality Notice, evaluating self-monitoring and stormwater management practices, and conducting a facility walk-through with photographs (Attachment 5). Plant personnel informed us that they will contact NEBCO environmental staff so they can provide us with the records I requested.

Soon after, we met with Ms. Jen Koenig, Messrs. James Hamlette, Russ George, Joel Woita, Jeff Dieckgrafe, and Linzy Johns. We introduced ourselves and I presented my credentials. I explained the purpose and procedures of the industrial stormwater compliance evaluation inspection.

I provided Ms. Koenig with the U.S. EPA Small Business Resources Information Sheet and the U.S. EPA Confidentiality Notice (CBI).

After a brief description of the site operations and stormwater management of the site, Ms. Koenig presented us with an electronic copy of the Stormwater Pollution Prevention Plan (SWPPP) (Attachment 2), the National Pollutant Discharge Elimination System (NPDES) General Permit (ISW-GP) from the Nebraska Department of Environmental and Energy (NDEE), inspection records and training records. I requested those records to be sent to my email.

After records review, site personnel escorted Mr. Wehrbein and I on a visual inspection of the site. We started our visual inspection by looking at fueling station (photo 1), the north dry bunker (photos 2 and 3), Outfall 03 (photo 4), a 250-gallon AST of used oil surrounded by concrete blocks as protection which was located at the northwest corner of the shop building (photo 5), the main aggregate pile just south of the shop building and the ready mix plant (photo 6), the ready mix plant (photo 7), inlet pipe at the ready mix plant that leads to Outfall 02 (photo 8), Outfall 02 with standing water (photo 9), the washout holding pits and re-claiming operation (photos 10, 12), truck wash station (photo 11), Outfall 01 and washout pits gate (photo 13), run-on drainage pipes from adjacent facility north of the site (photo 14), the gate at the southwest corner of the washout holding pits that was not fully closed to prevent discharge (photo 15), the south dry bunker (photo 16), and the paved drive way (photo 17).

After the site walkthrough, we held a formal exit meeting with site personnel. I discussed the preliminary observations, and I informed Ms. Koenig that I will issue a Notice of Preliminary Findings (NOPF) and email it to her upon my return to the office. In addition, I informed Ms. Koenig that I will communicate all other matters with her upon my further review of the submitted records upon my return to the office.

On August 5, 2024, I emailed Ms. Koenig the NOPF that included two preliminary observations (Attachment 3). On August 14, 2024, I received an email from Ms. Koenig that reads, *"We have the documents you requested ready; we sent them with our response to legal for review. I was*

out of the office for 5 days due to emergency surgery and just returned yesterday. So, if it is okay with you, I will email the requested documents today and we will get our response back from legal tomorrow and will next day air mail hard copies of all the documents to you that day. Please let me know if you would like us to email you the requested documents today or just send hard copies with our response tomorrow.” I granted Ms. Koenig request (Attachment 4).

On August 26, 2024, upon my return to the office, I received Husker Ready Mix formal response to the NOPF and a hardcopy of the updated SWPPP (Attachment 2).

Facility Description

NEBCO started operations at the site after purchasing it on August 1, 2018, which consists of the production of ready mixed concrete via a dry batch plant and raw materials (cements, fly ash, liquid admixtures, rock, and sand/gravel). The site is located at 201 S. 1st Street in Lincoln, Nebraska.

The property consists of approximately 7.1 acres including a large building hosting the offices and the maintenance shop, a ready-mix concrete plant, fueling station, two dry bunkers, aggregate storage piles, trucks parking area, and truck washout holding pits.

Production of ready mixed concrete is done inside via the dry batch plant. However, raw materials are unloaded and stored on paved areas to reduce the potential of materials entering the storm drain system as sediment. Operations such as parking, washing, and cleaning of mobile equipment such as haul trucks and drum mixing trucks are restricted to specific areas. Such outdoor practices can cause the exposure of fluids such as engine oil leaking onto concrete or the ground and particulates to runoff the property as a sheen.

Site Drainage Patterns

Majority of the site is paved, and selected areas are engineered to channel surface flow and any spilled/leaked materials toward the north and south dry bunkers and the washout holding pits before leaving the site via three outfalls into the Lincoln Municipal Separate Storm Sewer System (MS4) and into Salt Creek. The site is divided into three areas and each area is engineered to discharge toward its associated outfall as shown in Figure 1.

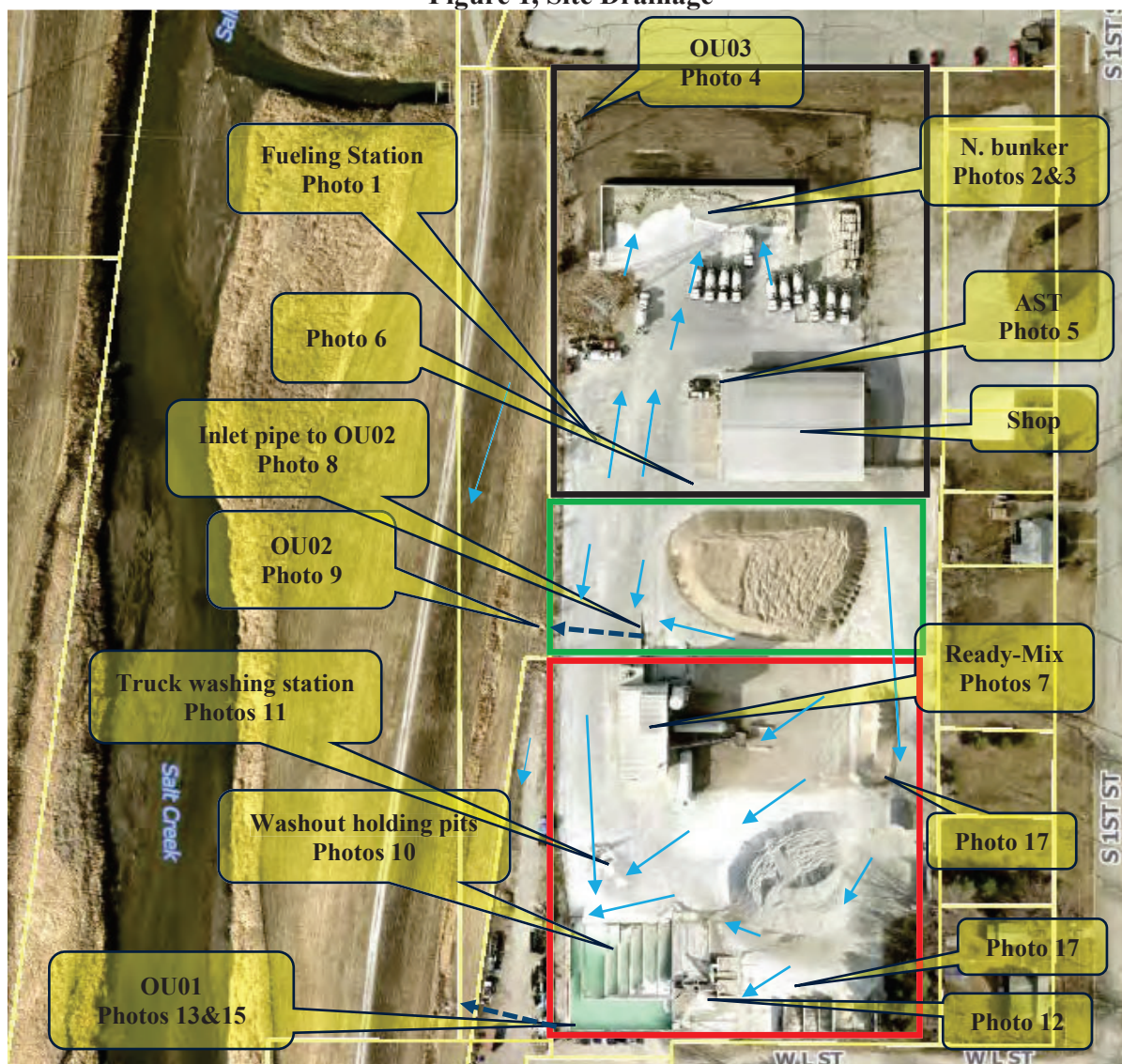
Area 3 is the drainage area to Outfall 03, and it is in the north part of the property. The paved surface is designed to direct surface runoff from the area north of the aggregate pile, including the shop building, to flow north into the north dry bunker (small portion) to Outfall 03. This area also includes the fueling station. Outfall 03 is located at the northwest corner of the property and drains approximately 1.9 acres of paved or building rooftops, and 0.6 acres of an undeveloped grassed area to the Lincoln MS4.

Area 2 is the drainage area to Outfall 02 and Outfall 01 via the washout holding pits. The paved area is located just south of the shop building, includes the aggregate pile, and just north of the ready-mix plant. The paved surface is designed to direct surface runoff from the area of the aggregate pile to flow west towards the vicinity of Outfall 02, and flow south into the washout holding pits which drains to Outfall 01. Outfall 02 is located along the west property edge of the facility approximately 400 feet north from the southwest corner of the property and drains

approximately 0.4 acres. Outfall 02 discharges to the west approximately 40 feet into the east ditch of Salt Creek Levee Trail.

Area 1 is the drainage area to Outfall 01 via the washout holding pits. The paved area is located just south of Area 2 and includes the ready-mix plant, two aggregate piles, truck washout station, re-claim operation, and the washout holding pits. The paved surface is designed to direct surface runoff from this area to flow west and south into the washout holding pits which drains to Outfall 01. Outfall 01 is a culvert pipe (photo 13) located on the southwest corner of the property and drains approximately 4.0 acres. Outfall 01 discharges to the west approximately 100 feet into the east ditch of Salt Creek Levee Trail.

Figure 1, Site Drainage



Findings and Observations

All findings and observations of this inspection concern the facility's status of compliance with the ISW-GP and stormwater management. These findings are based on my interview with site

personnel, my review of the SWPPP, and my visual observations of the site. All observations were discussed in detail with site personnel throughout the inspection and during the formal exit meeting on August 1, 2024. All photos taken during the inspection on August 1, 2024, are included as Attachment 5 to this report.

1. The site's structural controls such as the north and south dry bunkers, the washout holding pits, the design of the paved surface to direct surface sheet runoff toward the three outfalls, the washout holding pits, and the bunkers appeared adequate.
2. The site's non-structural controls such as implementation of the SWPPP, good housekeeping practices, maintenance of BMPs, spill prevention measures, employee training, and site inspections appeared adequate.
3. At the time of the inspection, I observed non-stormwater discharging from Outfall 01 located at the southwest corner of the site (photo 13). The discharge water was the washout water from the washout holding pits. Therefore, I issued Notice of Preliminary Finding number 2 (NOPF#2) because Outfall 01 was discharging (Unauthorized Discharge) process wastewater from the washout holding pits without obtaining a permit as required by the CWA-NPDES and Nebraska §81-1506 (2)(a). It appeared that the discharge was because the gate at the end of the pit was not completely closed or was faulty. Site personnel discussed that they would investigate fixing or completely blocking the discharge.

Photo 13, Outfall 01 discharging Washout Holding Pits water



4. During the inspection I noticed that there was standing water at the outlet of Outfall 02. As mentioned above, Outfall 02 receives sheet flow from area 2 and the inlet pipe located in front of the ready-mix loading bay where trucks add water to the dry mix (add-on-mix water). The

inlet pipe shown in photo 7 and photo 8 had a steel plate and wattle as BMPs to prevent discharge to Outfall 02.

Photo 8, Inlet pipe connected to Outfall 02



5. Ms. Koenig presented me with an electronic copy of the stormwater pollution prevention plan (SWPPP) she kept on her laptop. Overall, my review of the SWPPP indicated that the document is well written. The SWPPP was signed by Mr. James Hamlette on March 27, 2023.
6. The SWPPP was revised in June 2022, March 2023, May 2024, and August 2024, to update names of responsible officials, BMPs, and site map.
7. The SWPPP included a site map that identified structural and non-structural controls, sources of potential pollutants, drainage patterns, and outfalls.
8. Quarterly routine facility inspections and quarterly visual inspections, and comprehensive annual facility inspections are conducted accordingly by qualified personnel (Attachment 2 - Attachment G). The quarterly routine and visual facility inspections are done on the same day and inspection reports are combined.
9. Annual employee trainings are done accordingly (Attachment 2 - Attachment E).
10. Husker Ready Mix is subject to Subsector E2 - Concrete and Gypsum Product Manufacturers (SIC 3273) of the ISW-GP. Sector E2 requires the permittee to monitor for total suspended solids (TSS) as a benchmark monitoring threshold of 100 mg/L to determine the overall effectiveness of the stormwater control measures being implemented and to assist in knowing when additional corrective action(s) may be necessary to comply with the effluent limitations

listed in in Part 2 of the ISW-GP. Benchmark monitoring is required quarterly, by section 6.2.2.2 of the ISW-GP in the first and fourth year of permit coverage.

11. The permittee is required to conduct benchmark monitoring for TSS for four quarters in the first year of permit coverage, beginning in the first full quarter of permit coverage, and for four quarters in the fourth year of permit coverage (i.e., thirteenth through sixteenth quarters), unless the first quarter of the fourth year of permit coverage occurs on or after the date of permit expiration. ISW-GP number ISW-202200648 was issued on August 2, 2022, and will expire on March 31, 2027 (expiration date of all ISW-GPs for stormwater discharges associated with industrial Activity to waters of the state of Nebraska). Records indicated that the facility conducted a benchmark monitoring event in the second quarter of 2024, on April 16, 2024, at all three outfalls. Laboratory results indicated that the TSS concentration at Outfall 01 was 150 mg/L which exceeds the benchmark thresholds of 100 mg/L. According to the ISW-GP, the benchmark thresholds are not effluent limitations; therefore, a benchmark exceedance is not a permit violation. However, if a benchmark exceedance triggers Additional Implementation Measures (AIM), failure to conduct any required measures is a permit violation. There were no records provided to indicate that the facility took AIM. However, during the inspection Ms. Koenig indicated that screens were installed at the holding pits.
12. On September 6, 2024, I sent an email to Ms. Koenig asking if Husker Ready mix conducted any other benchmark monitoring events since the permit issuance and if AIM were taken based on the TSS benchmark threshold exceedance. On September 9, 2024, Ms. Koenig replied to my email indicating, *“For the April report, I asked the acting foreman to see if the silt fence on the pipe culvert needed replacing. But since we could still average under for the year that was the action. All the samples taken at one time are on the same report. We did sample again on July 1st. After that event the current foreman Jeff installed a new silt fence around the culvert opening and added the filter gutter buddies.”*
13. During the inspection I issued NOPF#1 indicating NEBCO failed to conduct annual effluent limitation monitoring (ELM) for TSS and pH from stormwater discharges runoff material storage piles as required by Section 6.2.3 and Section 8.E.5. of the ISW-GP. Upon my return to office, I dismissed NOPF#1 because this requirement applies to discharges from material storage piles at cement manufacturing facilities under SIC 3241. Husker Ready mix is ready mix concrete facility under SIC 3273.

Conclusion and Recommendations

Husker Ready Mix facility was well kept, and good housekeeping practices were noticeable during the inspection. Overall, structural and non-structural controls in place on site appeared adequate.

Husker Ready mix was discharging (Unauthorized Discharge) process water/washout water from the washout holding pits via Outfall 01 without obtaining a permit as required by the CWA-NPDES and Nebraska §81-1506 (2)(a).

NAJI AHMAD

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Naji J. Ahmad

Environmental Engineer, WB/DWIS

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Nicole Moran

Section Supervisor, WB/DWIS

Attachments:

1. R7 SW Checklist
2. SWPPP/NOPF Response
3. NOPF
4. emails
5. Photo Log