



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date: 12/6/2023
Regulatory Program: National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Stormwater and Mining
Facility Name: Allan Myers Paradise Quarry
Permittee: Compass Quarries, Inc. DBA Allan Myers Materials
Facility Owner/Operator: Compass Quarries, Inc. DBA Allan Myers Materials
Facility Address: 47 McIlvaine Road
Paradise, PA 17562
Latitude and Longitude: N 39.99644, W -76.09017
Permit No.: PA0595080
NPDES Permit Effective Date: 11/11/1990
NPDES Permit Expiration Date: 11/11/2025
SIC code: 1422

SHANE
MCALEER

Digitally signed by
SHANE MCALEER
Date: 2024.02.06
07:42:41 -05'00'

**Report Preparer
Signature/Date**

Shane McAleer (3ED33) NPDES Section 2

JESSICA
DUFFY

Digitally signed by
JESSICA DUFFY
Date: 2024.02.06
06:58:04 -05'00'

**Supervisor
Signature/Date**

Jessica Duffy (3ED33) Chief, NPDES Section 2

TABLE OF CONTENTS

I. INTRODUCTION 3

 A. Inspection Opening Conference.....3

 B. Weather and Precipitation.....3

 C. Summary of the Facility4

II. OBSERVATIONS 4

III. CLOSING CONFERENCE..... 6

List of Attachments:

- Attachment A: NPDES Permit No. PA0595080
- Attachment B: Photograph Log
- Attachment C: Facility SPCC-PPC Plan (dated May 2020)
- Attachment D: Module 12: Erosion and Sedimentation Controls
- Attachment E: Cover Letter (dated 12/21/2023)

I. INTRODUCTION

On December 6, 2023, representatives from EPA Region 3 collectively referred to as “the Inspection Team”, arrived at the Allan Myers Paradise Quarry facility (hereinafter, “the Facility”) at 47 McIlvaine Road, Paradise, PA. The purpose of the unannounced inspection was to observe and evaluate the Facility’s compliance with NPDES Permit No. PA0595080 (hereinafter, “the Permit”, see Attachment A) as well as Spill Prevention, Control, and Countermeasure (SPCC) compliance. The SPCC portion of this inspection can be viewed in an additional inspection report.

A. Inspection Opening Conference

The Inspection Team arrived at the Facility at approximately 9:30 a.m. for the inspection and met with Facility representatives and displayed credentials to Facility representatives. The inspection involved the following people:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
Shane McAleer, NPDES Inspector	USEPA Region 3	215-814 -5616	McAleer.Shane@epa.gov
Jeffrey Broudy, NPDES Inspector	USEPA Region 3	215-814-5761	Broudy.Jeffrey@epa.gov
Leighton Smith, SPCC Inspector	USEPA Region 3	215-814-5391	Smith.Leighton@epa.gov
Don Elly	Allan Myers	610-960-2605	Don.Elly@allenmyers.com
Adam Hess	Allan Myers	484-803-2304	Adam.Hess@allenmyers.com
Anthony Richardson	Allan Myers	410-459-5037	Anthony.Richardson@allenmyers.com
David Schnackenberg	Allan Myers	610-587-2262	David.Schnackenberg@allenmyers.com

B. Weather and Precipitation

At the time of the inspection, the weather was cloudy, approximately 35 degrees, with slight snow flurries just prior to the inspection. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the table below.

Table. 2 Precipitation Preceding Inspection¹

Station Name	Date	Precipitation Amount (inches) ²
Lancaster Airport, PA, 40.12 N	12/1/2023	0.18
Lancaster Airport, PA, 40.12 N	12/2/2023	0.02
Lancaster Airport, PA, 40.12 N	12/3/2023	0.42
Lancaster Airport, PA, 40.12 N	12/4/2023	0.00
Lancaster Airport, PA, 40.12 N	12/5/2023	0.00
Lancaster Airport, PA, 40.12 N	12/6/2023	Trace

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

C. Summary of the Facility

Allan Myers is a quarry which has the capabilities to mine, crush, screen, and store stone aggregate and lime. The Facility is located on a 98.1 acre property and also contains:

- A hot mix asphalt plant;
- A stockpile area;
- A diesel refueling area near the mining operation;
- A large area for truck and employee parking and truck deliveries and shipping;
- A truck maintenance shop;
- Unpaved roadways throughout the property for access from the asphalt area to the mining area.

Stormwater from paved areas, unpaved areas, and grassed areas is collected in a drainage system comprised of storm drains connected to storm sewer, drainage swales, a detention basin, and three (3) settling ponds. The drainage system discharges via two (2) stormwater outfalls (Outfalls 001 and 002). The three settling ponds discharge via Outfall 001 to Landonland Run and are associated with Facility mining operations. The detention basin discharges via Outfall 002 to Eshleman Run and is associated with industrial stormwater from the Facility asphalt operations.

II. OBSERVATIONS

After the inspection opening conference, the Inspection Team performed a Facility walkthrough. As part of the inspection, the Inspection Team visually observed Facility conditions and documented those conditions through photographs.

The photographs (Attachment B) for this report have been processed using EPA Region 3 's Photo Management Process. A file name (e.g., 2023-12-05--14.55.41_PC050006) which incorporates the date and time the photo was taken (e.g., 2023-12-05--14.55.41), as well as the original camera generated file name (e.g., PC050006) is assigned to each photo as part of the process. The file names generated by the camera are used to identify each photo in the Main Narrative and Photo Log of this inspection report. Unused photos are digitally stored and maintained in the inspection file. Unused photos are available upon request.

The following section presents the Inspection Team's observations relative to the Facility's Permit requirements.

Permit Requirement

Additional Requirements for Sections A and B, item 4 in the Permit states:

The permittee may not discharge floating materials, scum, sheen, or substances that result in deposits in receiving waters.

Observation 01:

The inspection team observed an area near the guiderail by the quarry operations that contained sediment debris which has direct access to a nearby swale (Attachment B, Photograph DSCN 3998)

Observation 02:

The inspection team observed an area near the asphalt operations that does not supply full secondary containment and has the potential to go into a nearby storm drain (Attachment B, Photograph DSCN 4007).

Observation 03:

The Inspection Team observed a small amount of oil sheen on a puddle inside of the secondary containment by the aboveground storage tanks containing oil (Attachment B, Photograph DSCN4014).

Observation 04:

The Inspection Team observed a discharge pipe in the oil tank secondary containment area that emptied into a bucket outside of the secondary containment area. The bucket was located near a sewer drain that flows into the detention basin associated with Outfall 002. There was product staining from the bucket previously being overfilled (Attachment B, Photographs DSCN4024 and DSCN4025).

Observation 04 Follow-up:

On January 3, 2023, Facility representatives submitted a letter dated December 21, 2023 (Cover Letter, Attachment E) indicating that the above-mentioned pipe was detached from the tank and the tank orifice was capped. The Cover Letter indicated that Allan Myers is designing a system to store the pipe within secondary containment and the pipe will remain out of use and the tank orifice capped until the pipe storage system has been installed.

Observation 04 Additional Follow-up

On January 31, 2024, facility representatives sent an email clarifying additional actions that were taken. The update stated that the discharge pipe was modified the week of January 29, 2024, so that it was within secondary containment when it was not in use.

Permit Requirement

Part C.II.D.1. of the Permit requires:

"If applicable, post-construction stormwater BMPs that are required under 25 Pa. Code Chapter 102 must be maintained."

Observation 05:

The Inspection Team observed debris covering, and inside of, stormwater sewer grates near the asphalt processing area (Attachment B, Photographs DSCN4030 and DSCN4033).

Observation 05 Follow-up:

The December 21, 2023 Cover Letter (Attachment E) indicated that Allan Myers will continue to sweep the area near the asphalt plant periodically to remove aggregate material accumulation, and that a catch basin insert was ordered and will be installed that will collect solid material that may migrate to the drain.

Observation 05 Additional Follow-up:

On January 31, 2024, facility representatives sent an email clarifying additional actions that were taken. The update stated that the catch basin insert was delivered and installed on 12/22/2023.

Permit Requirement

Section 12.2 in the Erosion and Sedimentation Controls Plan states:

Erosion and Sedimentation Control Plan has been developed to control and prevent erosion and siltation of the affected land during the development and mining of Paradise Quarry.

Observation 06:

The Inspection Team observed some erosion and evidence of sediment migration on an access road adjacent to the detention basin associated with Outfall 002 (Attachment B, Photographs DSCN4036, DSCN4039, DSCN4041).

Observation 06 Follow-up:

The December 21, 2023 Cover Letter (Attachment E) indicated that the eroded area on the access road adjacent to the detention basin was filled with aggregate and a filter berm was added. Facility representatives also submitted a photograph showing the aggregate that was added to the access road adjacent to the detention basin (Attachment B, Photograph 12/21/2023 Cover Letter).

III. CLOSING CONFERENCE

At the conclusion of the Facility walkthrough, the Inspection Team met with the Facility Representatives for a closing conference. The Inspection Team shared preliminary observations with the Facility Representatives and requested additional documentation from the Facility. Additional documentation was received from the Facility on January 3rd, 2024, including a cover letter dated 12/21/2023 (Attachment E) which contained the Facility response to several of the observations made by the EPA Inspection Team during the Facility walkthrough. An additional email was received from the Facility on January 31st, 2024, which contained follow-up actions that were noted in the cover letter (Attachment E). The Inspection Team reiterated to the Facility Representatives that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further review by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at approximately 4:30 PM (EDT).