



REGION 3

PHILADELPHIA, PA 19103

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 3 WATER BRANCH, ENFORCEMENT
AND COMPLIANCE ASSURANCE DIVISION
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT**

for

Name of Facility: Central Supply Company of West Virginia
Facility Address: Summersville Plant, 7900 Webster Rd, Summersville, WV 26651
Mailing Address: 4923 Benedum Dr., Bridgeport, WV 26330

Report Prepared on: 12/30/2024 By: _____,
Date *Environmental Scientist (ERG)*
Signature

Report Final as of: _____ By: _____, EPA
Date *Signature*

General Information

Type of Inspection:	Compliance Evaluation Inspection
Owner:	Central Supply Company
Operator:	Central Supply Company
Permittee:	Central Supply Company
NPDES Permit No:	WV0114596
NPDES Permit Issued Date:	September 16, 2022
NPDES Effective Date:	November 1, 2022
NPDES Permit Expiration Date:	September 15, 2027
Receiving Water and/or MS4:	Glade Creek, tributary to Gauley River
Latitude and Longitude:	38.3162° N, 80.8012° W

On-Site Facility Inspection Overview

On November 13, 2024, two representatives from EPA Region 3's contractor, ERG (hereinafter, referred to as the EPA Inspection Team) conducted a compliance evaluation inspection at Central Supply Company of West Virginia's (Central Supply's) Summersville plant (hereinafter, Facility) in Summersville, West Virginia. Central Supply is the Permittee and owns and operates the Facility. Two representatives from the West Virginia Department of Environmental Protection (WVDEP) attended the inspection.

Approximate Entry Time: 12:30 PM (EST) **Approximate Exit Time:** 2:45 PM (EST)

DSB ID: ECAD-5716

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I. INTRODUCTION

On November 13, 2024, two representatives from EPA Region 3's contractor, ERG (hereinafter, referred to as the EPA Inspection Team) conducted a compliance evaluation inspection at Central Supply Company of West Virginia's (Central Supply's) Summersville plant (hereinafter, Facility) in Summersville, West Virginia. Central Supply Company is the Permittee and owns and operates the Facility. Two representatives from the West Virginia Department of Environmental Protection (WVDEP) attended the inspection. The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and assess the Permittee's compliance with WVDEP's National Pollutant Discharge Elimination System (NPDES) Permit (No. WV0114596; hereinafter, the Permit; refer to [Appendix A](#)), effective November 1, 2022 through September 15, 2027.

The Facility is located at 7900 Webster Rd, Summersville, WV, and is a ready-mix concrete production plant. The Facility's Stormwater Pollution Prevention Plan (SWPPP) and internal inspection records were onsite for review (refer to [Appendix C, Exhibit 1](#)). The SWPPP map identifies two (2) outfalls, Outlet 001 and Outlet 002. Outlet 001 is located along the southern border of the site near the shop and administrative buildings, northwest of Outlet 002. Outlet 001 is permitted to discharge stormwater runoff and treated process water. Outlet 002 is located at the southwest corner of the Facility along Lower Glade Creek Road and is permitted to discharge only stormwater. Both outlets have detention ponds immediately upstream of the outlets, and both outlets discharge to Glade Creek, which is a tributary to the Gauley River.

The Permittee performs onsite analysis of pH at the outfalls and sends additional quarterly monitoring samples to Pace Analytical.

Photographs taken during the inspection are included in [Appendix B](#) (Photograph Log) and documents supporting observations in this report are included in [Appendix C](#) (Exhibit Log).

II. INSPECTION PROCESS

Inspection Opening Conference

The EPA Inspection Team arrived at the Facility at approximately 12:30 PM (EST) for the inspection. Jake Albright of ERG displayed his Clean Water Act inspector credential to the Facility representative upon entry and explained the primary purpose of the inspection was to evaluate the Facility's compliance relevant to the Permit requirements. The EPA Inspection Team explained that any information that the Facility deemed to be confidential business information ("CBI") should be identified during the inspection and it would be handled as CBI according to EPA's CBI procedures. Table 1 describes the individuals that participated in the inspection.

Table 1. Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region 3 Inspectors and Contractors			
Jake Albright, Inspector	ERG	(717) 440-0344	jake.albright@erg.com
Natalie Larsson, Inspector	ERG	(703) 829-7517	natalie.larsson@erg.com
Facility Representatives			
Marc Walmsley	Central Supply Co.	(304) 709-8523	mwwamsley@centralsupplywv.com
WVDEP			
Kimberly Dempsey (Maxwell)	WVDEP	(681) 319-7977	kimberly.a.maxwell@wv.gov
Marlan Zwoell	WVDEP	(304) 488-3524	marlan.a.zwoell@wv.gov

Weather and Precipitation

At the time of the inspection, the weather was sunny with a maximum temperature of approximately 48 degrees Fahrenheit; no precipitation was experienced during 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

Location	Date*	Precipitation Amount (inches)
SUMMERSVILLE LAKE, WV	11/14/2024	0.15
SUMMERSVILLE LAKE, WV	11/13/2024	0.00
SUMMERSVILLE LAKE, WV	11/12/2024	M**
SUMMERSVILLE LAKE, WV	11/11/2024	M**
SUMMERSVILLE LAKE, WV	11/10/2024	0.00
SUMMERSVILLE LAKE, WV	11/9/2024	M**

*Precipitation values are reported every 24 hours starting at 7am. The date after the inspection was included to capture the precipitation that occurred during the inspection.

** "M" value indicates missing data

Facility Inspection

As part of the inspection, the EPA Inspection Team visually observed Facility conditions in the presence of the Facility representatives (refer to Appendix B, Photographs 1 through 27).

The Facility's concrete production area encompasses approximately 2.2 acres and contains a ready-mix batch plant, a primary hopper/elevator for loading materials into the trucks, a truck washing station, a truck storage area, uncovered raw materials stockpiles/outdoor storage bins

¹ Source: NOAA Online Weather Data, Charleston WV Forecasting Office (<https://www.weather.gov/wrh/Climate?wfo=rlx>)

(sand, gravel, and limestone), a casting bay, material storage sheds, an office/dispatch building, and a waste concrete pouring site.

The Facility produces ready-mixed concrete and creates bin blocks from leftover concrete. The Facility receives deliveries of raw materials necessary for production by way of truck. The Facility representative stated that they produce between 25 and 50 cubic yards of concrete per day, with a maximum of 75 cubic yards of production when the Facility is busiest. The CO₂ pH treatment system, which treats process water prior to being discharged from Outlet 001, was not working at the time of the inspection, and had not been working for at least four years prior to the inspection date. At the time of the inspection, process water was being collected from the settling basins and trucked offsite to the company's Buckhannon facility as needed. The Facility representative stated that the settling basins had not been pumped out during 2024 through the date of the inspection.

The Facility has a fueling station for their trucks with a 10,000-gallon diesel aboveground storage tank (AST). Most of the facility area is gravel except for the area immediately around the main buildings and the concrete area along the northern edge of the site where concrete bin blocks are poured.

There are two discharge points at the Facility. Outlet 002 is located in the southwestern corner of the Facility, along Lower Glade Creek Road and collects runoff from the northern and western portions of the site, including the gravel road north of the main building, the fueling area, and the concrete bin block area. Outlet 001 is located northeast of Outlet 002 and collects runoff from the eastern portion of the site, including the concrete loading area, aggregate storage area, and concrete wash area. Detention ponds were located immediately upstream of each outlet.

Figure 1 shows the Facility layout from the SWPPP Drainage Map. Additional details related to the Facility conditions at the time of the inspection are included in the *Summary of Observations* section of this report.



Figure 1. SWPPP Site Drainage Map

Summary of Observations

The following section summarizes the EPA Inspection Team's observations relative to the Facility's Permit requirements, including the status of certain treatment units, operation and maintenance practices, and the Facility's monitoring and reporting documentation.

Discharge Limitations and Monitoring Requirements

Section A, Tables A.001 and A.002 of the Permit list the "Discharge Limitations and Monitoring Requirements" for Outlets 001 and 002.

Observation 1. According to Discharge Monitoring Report (DMR) data reviewed in EPA's Enforcement and Compliance History Online (ECHO) database (refer to [Appendix C, Exhibit 2](#)), there have been 10 exceedances at Outlet 001 from the Permit effective date through the 3rd quarter of 2024 (i.e., November 1, 2022, through September 30, 2024) as shown in Table 3 below. According to EPA's ECHO database, Outlet 002 had not discharged during the Permit term ("No Discharge").

Table 3. Outlet 001 Effluent Exceedances (November 1, 2022 – September 30, 2024)

Permit #	Monitoring Period End Date	Outlet	Parameter Name	DMR Value	Permit Limit	Units	Limit Type
WV0114596	2/28/2023	001	Chromium, hexavalent (as Cr)	0.103	0.015	mg/L	Daily Max
WV0114596	2/28/2023	001	Chromium, hexavalent (as Cr)	0.103	0.004	mg/L	Monthly Avg
WV0114596	2/28/2023	001	Aluminum, total recoverable	0.56	0.28	mg/L	Monthly Avg
WV0114596	2/28/2023	001	Copper, total recoverable	0.0072	0.006	mg/L	Monthly Avg
WV0114596	4/30/2024	001	Solids, total suspended	66.5	50	mg/L	Daily Max
WV0114596	4/30/2024	001	Iron, total recoverable	2	1.3	mg/L	Monthly Avg
WV0114596	4/30/2024	001	Chromium, hexavalent (as Cr)	0.132	0.015	mg/L	Daily Max
WV0114596	4/30/2024	001	Chromium, hexavalent (as Cr)	0.132	0.004	mg/L	Monthly Avg
WV0114596	4/30/2024	001	Aluminum, total recoverable	2	0.75	mg/L	Daily Max
WV0114596	4/30/2024	001	Aluminum, total recoverable	2	0.28	mg/L	Monthly Avg

Pollution Prevention and Good Housekeeping

Section C.1 of the Permit states, “the permittee shall practice good housekeeping including maintaining the facility grounds. There shall be no scattered parts, equipment, debris, etc. Any and all drums shall be either stored in a covered area or kept upon pallets and properly sealed.”

Section C.24 of the Permit states, “Solid wastes generated by the facility or any other solid waste shall be disposed of in a manner consistent with any, and all, appropriate laws and regulations. The permittee shall perform quarterly inspections of the facility area and remove and dispose of any accumulated litter.”

Part 8.0 of the Facility SWPPP, Good Housekeeping, states “good housekeeping procedures at this site include the appropriate disposal of wastes, proper material storage, and prompt clean-up of spilled materials.”

Observation 2. The EPA Inspection Team observed yard scraps and waste concrete material had overflowed and migrated beyond containment immediately adjacent to the Outlet 001 detention pond (refer to [Appendix B, Photographs 1 and 2](#)).

Observation 3. The EPA Inspection Team observed metal scrap piles upgradient of Outlet 002. Scrap metal pieces were located around the Outlet 002 detention pond, near the Outlet 002 marker (refer to [Appendix B, Photograph 3](#)). Some of the scrap metal was surrounded by concrete bin blocks, but other scrap metal was scattered, uncontained, and within about 25 feet of Glade Creek (refer to [Appendix B, Photographs 4 and 5](#)).

Observation 4. Vehicle parts and other scrap materials were observed stored, uncovered, outside of the maintenance garage, within the Outlet 002 drainage area (refer to [Appendix B, Photograph 6](#)). The EPA Inspection Team observed concrete residue on some of the material, and petroleum staining was observed on the impervious surface around the edge of the scrap material. The Facility representative was unable to locate a spill kit onsite (see Observation 5).

Section 7.3 of the Facility’s SWPPP, Fueling Areas, states that “any spillage which may occur during the fueling activities will be cleaned up using spill kit materials located at the diesel fuel tank.”

Observation 5. There was no spill kit or cleanup materials observed at the diesel fuel station, and the Facility representative was unable to locate them elsewhere at the Facility. The EPA Inspection Team observed multiple instances of petroleum staining around the site (refer to [Appendix B, Photographs 7 through 10](#)).

Effluent and Receiving Water

Appendix A, Part I.12 of the Permit, Water Quality Standards, states “this discharge shall not cause or materially contribute to: distinctly visible floating or settable solids...[or] distinctly visible color which may impair or interfere with the designated uses of the affected waters.”

Observation 6. The EPA Inspection Team observed grey residue, indicative of concrete, on the rip rap between the Outlet 001 pipe and Glade Creek (refer to [Appendix B, Photographs 11 and 12](#)). Additionally, the interior of the Outlet 001 pipe had similar grey residue (refer to [Appendix B, Photograph 13](#)). As noted in Observation 1, Outlet 001 discharged in the second quarter of 2024 resulting in multiple effluent limit exceedances.

Appendix A, Part I.3 of the Permit, Management Conditions, Duty to Mitigate, states “The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit, which has a reasonable likelihood of adversely affecting human health or the environment.”

Observation 7. The EPA Inspection Team observed an eroded channel leading from the truck loading area to the Outlet 001 detention pond, allowing process water to flow directly into the pond and bypass the settling basins and treatment (refer to Appendix B, Photographs 14 through 19). Flow containing concrete residue was observed flowing toward the Outlet 001 detention pond at the time of the inspection, and concrete residue was observed at the edge of the pond. Outlet 001’s detention pond was full of water and grey material at the time of the inspection.

Proper Operation and Maintenance

Appendix A, Part II.1 of the Permit, Proper Operation and Maintenance, states “The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit.”

Section C.17 of the Permit states, “The sedimentation basins shall be maintained in such a manner as to prevent violations of Section 17. A of this permit.”

Observation 8. The Facility’s CO₂ pH control system was not functioning at the time of the inspection (refer to Appendix B, Photograph 20). The pH control system is responsible for treating process water prior to discharge through Outlet 001. The Facility representative explained that process water was being held in the settling basins and pumped out and trucked from the Summersville facility to the Buckhannon facility for treatment and discharge as needed. The Facility representative further stated that this process had been ongoing for at least 4 years; however, the settling basins had not been pumped at all during 2024, through the date of the inspection.

The Facility representative stated that a new pH control system had been delivered, but there was not yet an installation date for the new system. The EPA Inspection Team observed the new system which was being stored on a pallet in the maintenance shop at the time of the inspection (refer to Appendix B, Photograph 21).

Observation 9. The EPA Inspection Team observed that the two concrete process water settling basins on the eastern portion of the site were beyond capacity at the time of the inspection (refer to Appendix B, Photographs 22 and 23). Specifically, there was no freeboard in either of the basins, and water was flowing out of the basin containment and onto the ground on the south side of

the basins. As stated previously, the basins had not been pumped out for the entirety of 2024, through the date of the inspection. Section 7.9, Equipment Cleaning, of the SWPPP, states “Process water generated by truck washing activities is being hauled to another permitted facility for treatment and discharge, as allowed by the permit issued to the site.”

Process water was observed running down the outside of the southern side of the basins toward a drainage ditch that leads to Outlet 001 (i.e., circumventing the treatment system). Wet concrete and cement were observed along the outer wall of the southern side of the basins (refer to [Appendix B, Photograph 24](#)). The area on the east side of the settling basins was also wet (refer to [Appendix B, Photograph 25](#)).

It should be noted that the forecast for Summersville on the day following the inspection called for heavy precipitation. The Facility representative sent an email to the EPA Inspection Team on November 14, 2024, stating the Permittee had begun pumping process water out of the basins and trucking it to the Buckhannon facility the morning following the inspection, in preparation for the storm (refer to [Appendix C, Exhibit 3](#)).

Monitoring and Reporting

Appendix A, Part III.3 of the Permit, Test Procedures states “Samples shall be taken, preserved and analyzed in accordance with the latest edition of 40 CFR Part 136, unless other test procedures have been specified elsewhere in this permit.”

Observation 10. Facility staff were not documenting the time pH compliance samples were taken and when they were analyzed to verify the 15-minute hold time was met.

Additionally, the Facility did not document pH meter calibration for the Hanna pH meter (refer to [Appendix B, Photograph 26](#)) used for onsite pH compliance monitoring. The Facility representative stated that the pH meter undergoes a two-point calibration using buffer solutions; however, he stated the Facility had just run out of the buffers prior to the inspection. Therefore, the EPA Inspection Team could not verify the expiration dates of the solutions.

Outlet Markers

Appendix A, Part I.13 of the Permit, Outlet Markers, states “a permanent marker at the establishment shall be posted in accordance with Title 47, Series 11, Section 9 of the West Virginia Legislative Rules,” which states, “1) a marker shall be posted on the stream bank at each outlet cover by the permit, 2) the marker shall consist of the name of the establishment to which the permit was issued, the permit number, and the outlet number, and 3) the marker shall be a minimum of two (2) feet by two (2) feet and shall be a minimum of three (3) feet above the ground level.”

Observation 11. The EPA Inspection Team observed the outlet marker for Outlet 002 listed the name of the previous plant owner, Boxley Concrete (refer to [Appendix B, Photograph 27](#)). The Outlet 002 marker did not contain all of the components required by the Permit. The outlet marker for Outlet 001 was correct and listed Central Supply Company of West Virginia as the owner.

Records Review

The EPA Inspection Team reviewed records pertaining to Permit requirements. Many of the records required by the Permit were provided electronically for review prior to the inspection. The following records were reviewed:

- SWPPP, revised April 2022
- Spill Prevention, Control and Countermeasure Plan, dated April 2022
- Quarterly Facility inspection records, November 2023 through November 2024
- Facility DMRs and associated lab data, 3rd quarter 2023 through 3rd quarter 2024
- EPA ECHO Detailed Facility Report and Exceedances Report

Although not a Permit requirement, it should be noted that the Facility's SWPPP had not been updated within the current Permit term. The SWPPP appeared representative of operations and site logistics observed at the time of the inspection.

Closing Conference

After the Facility inspection, the EPA Inspection Team met with the Facility representatives for a closing conference and shared their preliminary observations. The EPA 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 investigation by the EPA Inspection Team 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, as a result of reviewing additional documentation following the inspection.

The inspection concluded at approximately 2:45 PM (EST).