



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 2
Enforcement and Compliance Assurance Division
Water Compliance Branch
Clean Water Act (CWA) Inspection Report

Program: Industrial Stormwater (5G2)	Inspection Type: Compliance Evaluation Inspection
Site Name: Tri-State Quikrete	NJPDES/ICIS No.: NJG167789
Inspection Entry Date: 09/04/2024 Inspection Entry Time: 9:40 AM	Inspection Exit Date: 09/04/2024 Inspection Exit Time: 11:00 AM
Facility Inspected: Tri-State Quikrete 150 Gold Mine Road Flanders, NJ 07836	
Lat, Long: 40.88045, -74.71525 NAICS / SIC Code: 3272 - Concrete Products, Except Block and Brick	
EPA Representative(s): Christina Palmrose-Krieger, EPA Region 2, 212-637-4049, Palmrosekrieger.Christina@epa.gov	
State Representative(s): N/A	
On-site Facility Representative(s): Tony Miceli, Operations Manager, Tony.Miceli@quikrete.com	
Name and Address of Responsible Official: Tony Miceli 150 Gold Mine Road Flanders, NJ 07836	
Name and Signature of Inspector CHRISTINA PALMROSE-KRIEGER	Agency/Office/Phone Number USEPA/ECAD-WCB/212-637-4049
 Digitally signed by CHRISTINA PALMROSE-KRIEGER Date: 2024.10.23 09:37:38 -04'00'	
Name and Signature of Management QA Reviewer 	Agency/Office/Phone Number USEPA/ECAD-WCB/212-637-4268
Digitally signed by JUSTINE MODIGLIANI Date: 2024.11.05 11:18:16 -05'00'	

I. INTRODUCTION:

On September 4, 2024, a representative from the United States Environmental Protection Agency (“EPA”) conducted a Compliance Evaluation Inspection (“CEI” or “Inspection”) at Tri-State Quikrete (the “Site” or “Facility”) located at 150 Gold Mine Road, Flanders, New Jersey. At the time of the CEI, the Site had coverage under the New Jersey Department of Environmental Protection (“NJDEP”) State Pollutant Discharge Elimination System (“NJPDES”) 5G2 Basic Industrial Stormwater General Permit NJ0088315 (“5G2” or “Permit”), under NJPDES ID No. NJG167789. The current 5G2 Permit became effective on February 1, 2023, and is effective through January 31, 2028. Weather conditions at the

time of the CEI were approximately 68°F and sunny.

II. FINDINGS AND OBSERVATIONS:

Upon entering the Site, EPA Inspector Christina Palmrose-Krieger presented credentials to Tony Miceli, Operations manager. EPA Inspector Palmrose-Krieger held an opening conference with Mr. Miceli and explained the purpose, scope, and goals of the inspection and explained that records would be reviewed, as well as an on-site walk through of the Facility would be conducted. EPA Inspector Palmrose-Krieger also explained that a closing conference would be conducted at the end of the Inspection where preliminary observations would be conveyed.

After the opening conference, EPA requested to review the on-site paperwork, including the Stormwater Pollution Prevention Plan (“SPPP”), Site inspection records, and employee stormwater training records. At the time of the CEI, Mr. Miceli stated that an inspector from NJDEP, Jonah Balla, had recently done an inspection of the Facility. The Facility representative also stated that he did not know that annual inspection certifications were required to be submitted. After reviewing the available paperwork, EPA conducted a Site walkthrough beginning and ending on the north side of the Site in the employee parking lot.

The Site is a manufacturer of packaged concrete, classified under SIC: 3272 - Concrete Products, Except Block and Brick. The Site is on approximately eight (8) acres to the south of Gold Mine Road. EPA began the Inspection in the north section of the Site which contains the main office building, packaged product ready to ship, and the employee parking lot. Source material was seen on the pavement in the employee parking lot (Attachment 1; DSCN3680, DSCN3681, and DSCN3682). EPA continued the Inspection to the Site’s northeast entrance along Gold Mine Road. A catch basin is located at the entrance of the Site (Attachment 1; DSCN3685, DSCN3688, DSCN3689, and DSCN3767). The Facility representative stated that there are two (2) catch basins located on the property, and both catch basins have been outfitted with screens. Source material accumulation and a sheen was observed in the catch basin near Gold Mine Road (Attachment 1; DSCN3688 and DSCN3689). The Facility Representative stated that the screens on both catch basins had been cleaned several weeks ago and would be scheduled to be cleaned in a few more weeks. The Tri-State Quikrete Preventative Maintenance Report provided to Inspector Palmrose-Krieger during the paperwork review indicated that the preventative maintenance inspection for the catch basins was already complete for the month of September. The Preventative Maintenance report indicated that the “storm screens cleaned” was “satisfactory” (Attachment 2).

Mr. Miceli stated that the catch basins discharge to the other side of Gold Mine Road. At the time of the CEI, due to the limited shoulder along the Gold Mine Road, embankment and vegetation, this outfall was not able to be accessed or observed. Mr. Miceli also stated that there is an issue with flooding in this area of Gold Mine Road. Source material was observed along Gold Mine Road (Attachment 1; DSCN3684, DSCN3691, DSCN3692, and DSCN3694).

EPA continued the Inspection along the eastern side of the Site to the second catch basin. Stormwater and source material was observed in and around the catch basin (Attachment 1; DSCN3703, DSCN3705, and DSCN3706). Waste and materials to be recycled were also stored along the eastern edge of the Site (Attachment 1; DSCN3701 and DSCN3702). EPA continued the Inspection to the South side of the Site

where the aggregate bunks for mason sand, 3/8 gravel, and concrete sand are located (Attachment 1; DSCN3711, DSCN3712, DSCN3713, and DSCN3715). EPA observed stormwater collecting and pooling on the source material in the aggregate bunks and flowing in the direction of the catch basins to the north (Attachment 1; DSCN3719). Near the aggregate bunks were stockpiles of material to be recycled, according to the Facility representative (Attachment 1; DSCN3720). Trash and other waste material was also observed near the material to be recycled (Attachment 1; DSCN3723, DSCN3728, DSCN3730, and DSCN3731). Continuing to the south side of the Site, EPA observed an area used for storage of equipment, materials, and an uncovered scrap metal dumpster upgrade from the catch basins (Attachment 1; DSCN3724, DSCN3725, and DSCN3727).

In the central area of the Site there is a main industrial building where portland cement and other product to be used in the Facility's manufacturing process is unloaded, mixed, and bagged (Attachment 1; DSCN3743, DSCN3739, and DSCN3707). The Facility representative stated that this is a dry mixing process and no wastewater is created during manufacturing. Also located in the central area of the Site is a trash compactor (Attachment 1; DSCN3761 and DSCN3762) and the Facility's diesel and propane storage. EPA observed propane canisters stored outside of storage cabinets, and the secondary containment structure for the diesel tank was in need of maintenance (Attachment 1; DSCN3749, DSCN3751, and DSCN3752). This diesel tank is located upgrade from the nearest catch basin. The Facility representative stated that the Facility uses Penske for their commercial trucking needs, and no truck fueling, washing, or maintenance is done on-site. The Facility representative also stated that the diesel fuel located onsite is used for fueling the Facility's front loader (Attachment 1; DSCN3755). The west portion of the Site is used for storing product ready to be shipped (Attachment 1. DSCN3744 and DSCN3748). The Site representative stated that sweeping of the Site takes place approximately one time per month.

III. POTENTIAL NONCOMPLIANCE ITEMS:

1. Part 1.D.4.b of the Permit states that annually, facilities shall submit the Department's Certification Form certifying that they have conducted an annual self-inspection and that they are in compliance with all permit conditions as required in Part 1.H. Based upon the information in EPA's Enforcement and Compliance History Online ("ECHO") database, the Facility did not submit an Annual Inspection Certification for the years 2018, 2019, 2020, 2021 and 2023.
2. Part I.E.1.a of the Permit states that every facility authorized under this permit shall eliminate the exposure of source materials and/or industrial activity to stormwater discharges through the preparation and implementation of a SPPP that includes the contents required in Part 1.F. At the time of the CEI, the Facility had not eliminated exposure of source materials or industrial activity to stormwater discharges through the development and implementation of a SPPP. The SPPP provided by the Facility did not contain all of the requirements outlined in Part 1.F. of the Permit.
3. Part I.F.1.a of the Permit states that the SPPP must include a detailed description of all source materials used, stored, or otherwise located at the facility and all industrial activities conducted at the facility, including seasonal activities that are exposed to stormwater runoff. At the time of the CEI, the Facility's provided SPPP did not include all source materials, such as the diesel fuel storage, and did not provide a detailed description of all industrial activities conducted at the Facility.

4. Part I.F.2.a. of the Permit states that the SPPP is required to include a map of the entire facility that contains:
 - i. The property boundary;
 - ii. The location(s) of existing buildings and other permanent structures;
 - iii. All paved areas, including roads and access areas;
 - iv. Stormwater control features including but not limited to drainage patterns, stormwater conveyances (e.g. stormwater catch basins, downspouts [where there is industrial activity on the roof], overland flow, swales, ditches and channels, and storm sewer pipes), designed stormwater basins (e.g. infiltration, detention, and retention) and the location of all stormwater discharge structures;
 - v. The location(s), if any, where sanitary sewage, non-contact cooling water, equipment and vehicle wash wastewater, or process wastewater (including but not limited to leachate, contact cooling water, pressure-wash wastewater, hydro-blasting wastewater, boat bottom wash wastewater, and vehicle and equipment wash wastewater) generated by the facility enters a storm water conveyance that discharges to waters of the State; and
 - vi. The delineation of the areas regulated by this permit, including all source material storage areas and industrial activities conducted onsite.

The map provided by the Facility did not include all required elements listed in Part I.F.2 of the Permit (Attachment 3.b).

5. Part I.F.3.a of the Permit states that the SPPP is required to include a list of the Best Management Practices (BMPs) that are implemented at the facility in the areas regulated by this permit as identified in the mapping requirements in F.2 to eliminate the exposure of source materials and/or industrial activity to stormwater discharges. At the time of the CEI, the BMPs listed in the Facility's SPPP were not sufficient in eliminating exposure of source material or industrial activity to stormwater.
 - a. At the time of the CEI, the EPA inspector observed stormwater freely collecting and flowing downhill and a lack of structural or stabilization methods to prevent or minimize contact with pollutants and/or erosion methods for controlling sediment and pollutants around aggregate storage (Attachment 1; DSCN3712, DSCN3719)
 - b. EPA observed stormwater collecting and flowing downhill from waste storage, uncovered dumpsters, and recyclable material areas (Attachment 1; DSCN3725, DSCN3731, DSCN3702, and DSCN3723)
 - c. EPA observed significant amounts of source material on pavement along the main drive, loading and unloading areas, and onto Gold Mine Road (Attachment 1; DSCN3694, DSCN3700, DSCN3711, DSCN3755, and DSCN3767)
 - d. EPA observed a significant amount of source material build up and sheen on catch basin screens (Attachment 1; DSCN3688, DSCN3689, DSCN3706, and DSCN3705)

- e. EPA observed secondary containment of the diesel tank was in need of repair and staining was visible on the source material near the fueling hose (Attachment 1; DSCN3752)
 - f. Dust collector bins were overflowing with collected materials (Attachment 1; DSCN3739)
6. Part I.F.4.a of the Permit states that the SPPP is required to include a plan that ensures regular, preventative maintenance and appropriate repairs, including replacement of all structural BMPs and the updating of non-structural BMPs such as Standard Operating Procedures (SOPs). At the time of the CEI, the Facility's provided SPPP did not include a sufficient narrative description of the structural BMP maintenance repairs and or/replacement nor the updating of non-structural BMPs to ensure that the Facility does not discharge any unpermitted wastewaters (Attachment 3.b).
7. Part I.G.1.a of the Permit states that the permittee shall conduct annual self-inspections of the facility to ensure that the SPPP is:
- i. Current and up-to-date;
 - ii. Properly implemented; and
 - iii. Effectively eliminating the exposure of source materials and/or industrial activity to stormwater discharges, as regulated under this permit, through the implementation of structural and non-structural BMPs.

At the time of the CEI, the SPPP provided by the Facility was last updated in 2022 and is not effectively eliminating the exposure of source materials and/or industrial activity to stormwater discharges, as regulated under this permit, through the implementation of structural and non-structural BMPs.

IV. AREAS OF CONCERN:

1. Part I.E.3 states that the permittee shall provide a copy of the SPPP and the certifications required by the permit to the owner(s) of the facility. The permittee shall make the SPPP available or provide a copy upon request to an authorized representative of the Department. The SPPP provided by the Facility did not include the following certifications:
- a. Authorization/Authorization to Discharge
 - b. Completed SPPP Preparation Certification
 - c. Completed SPPP Initial Implementation Certification
 - d. Completed Annual Certification form
2. The Facility representative stated, and the provided Facility SPPP indicates, that there are two (2) catch basins located at the Facility. However, the provided SPPP map of the Facility is not clearly labeled. The previous inspection report provided by NJDEP indicates that there are five (5) stormwater catch basins that discharge off-site. Clarification is needed on how many catch basins are located at the Facility.

V. CLOSING:

A closing conference was held with Mr. Miceli where preliminary findings and observations from the CEI were discussed and the subsequent follow-up that would take place.

IV. ADDENDUM:

On September 5, 2024, Mr. Miceli sent a copy of the 5G2 annual certification form that was dated October, 2023. On September 6, 2024, Mr. Miceli sent EPA a copy of the Facility's current SPPP, a NJDEP 5G2 inspection report from 2022, and a Preventative Maintenance Log. October 16, 2024, Mount Olive Township representatives provided information on the stormwater conveyance and discharge from the Facility's catch basins on the north side of Gold Mine Road.

ATTACHMENTS

Attachment 1 – CEI Photograph Log, September 4, 2024

Attachment 2 – Scanned Tri-State Quikrete Monthly Preventative Maintenance provided the day of the CEI, September 4, 2024

Attachment 3.a – EPA requested documents provided by Tri-State Quikrete, September 5, 2024

Attachment 3.b – EPA requested document provided by Tri-State Quikrete, September 6, 2024

Attachment 4 – Mount Olive Township stormwater conveyance discharge map, October 16, 2024

Attachment 5 – EPA Tri-State Quikrete Hydrography Maps