

EPA Region 10 Enforcement and Compliance Assurance Division

INSPECTION REPORT

Inspection Entry Date/Time	02/16/2023 11:30 AM (PT)	Announced: No
Inspection Exit Date/Time	02/16/2023 12:30 PM (PT)	Access: Granted
Weather	Sunny, 45°F	
Media	Water	
Statute(s)/Program(s)	Clean Water Act, NPDES, Industrial	
Type of Inspection	Industrial Stormwater Inspection	
Permittee Name	Interstate Concrete and Asphalt	
Site Name	Interstate Concrete and Asphalt – Prosser Facility	
Site Physical Address	2500 SR 221	
City, State, Zip Code	Prosser, WA 99350	
County	Benton	
Facility GPS Coordinates	46.2069091796875, -119.738960266113	
Mailing Address	P.O. Box 3366	
City, State, Zip Code	Spokane, Washington 99220-3366	
FRS ID	WAT4839378716	
Permit Number	WAG507221	
NAICS	327320 - Ready-Mix Concrete Manufacturing 327390 - Other Concrete Product Manufacturing	
Lead Inspector:		
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov (206) 553-4252
Supervisor Review:		
Peter Contreras	EPA Region 10	contreras.peter@epa.gov (206) 553-6708

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

I arrived at the Interstate Concrete and Asphalt - Prosser site (“Site” or “Facility”) for an unannounced industrial stormwater inspection. I presented my inspector credentials to Jana McDonald and informed her I was there to determine compliance with the Clean Water Act (CWA) and the Washington Department of Ecology’s (WDOE) Sand and Gravel General Permit. This report is based on information and documentation supplied by Interstate Concrete and Asphalt and direct observations made during the inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
CRH Americas Materials, Inc	Jana McDonald	Environmental Manager	Yes	Yes
CRH Americas Materials, Inc	Kelby Johnson	Ready Mix General Manager	Yes	Yes
CRH Americas Materials, Inc	Jimmie Roper	Ready Mix Site Superintendent	Yes	Yes

Site Information

Responsible Official	Mike McBreen, Vice President, michael.mcBreen@na.crh.com
What is the principal product generated?	Concrete is the only product generated at the Prosser facility.
Type of Operation	Concrete Batch Plant
What are the raw materials used?	Sand and Gravel
Size of Facility	2.6 acres
Outfalls	There are no outfalls identified in the Site Management Plan or the Site map; however, there is an outfall identified as G001 in the Notice of Intent.

SECTION II – OBSERVATIONS

The Prosser site consists of two primary operations, the concrete batch plant and the truck washout. The concrete batch plant is solely to produce dry concrete. Equipment used on site includes feeders, conveyors, weigh hoppers, cement storage silos, and mixers. The stockpiled material (**Photo 1**) is transferred by front-end loader to the batch plant feeder. The sand and gravel go to a weigh hopper and then into the mixer truck drum. Cementitious products are pneumatically transferred from a tanker/delivery truck into a silo. It is transferred from the silo into the weigh hopper and then into the mixer drum. Concrete admixtures and petroleum products are stored inside the shop building.



Photo 1/P1010591 – Stockpiles of Concrete Manufacturing Inputs

The Prosser site also maintains a truck washout facility to clean the mixer trucks. The washout facility is on a concrete slab that drains to concrete lined settling ponds (**Photo 2**). Sediment settles out of the water which is then recycled for reuse. Sediment is removed from the ponds as needed. The washout also receives stormwater that falls nearby.



Photo 2/P1010290 – Truck Washout

SECTION III – RECORDS REVIEW

I reviewed the following documents:

- Notice of Intent (Renewal) – dated September 29, 2020
- Site Management Plan (SMP) – dated October 15, 2018
- SMP Site Map – dated September 2020
- Discharge Monitoring Reports (DMRs) – February 2022 through January 2023
- EPA’s Integrated Compliance Information System – January 1, 2018 through February 28, 2023

Any issues found during Records Review are in the Areas of Concern.

SECTION IV - AREAS OF CONCERN

The presentation of Areas of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-NT	Records Review
Regulation and/or Permit Requirement	
S5.D.2.a of the Permit states, in part, the site map must “assign a unique identifier up to four characters (e.g. S001, S002, etc.) to each outfall and monitoring point.”	
AOC: The Prosser site map shows two stormwater monitoring points, labeled MP#1 and MP#2, but does not show an outfall point. The Notice of Intent Renewal Application, dated September 29, 2020, only shows one monitoring point, labeled MP1, and includes a discharge point/outfall, identified as G001. The Site Management Plan (SMP), dated October 15, 2018, identifies a single monitoring location, labeled MP1, and does not include a discharge point or outfall.	

AOC Reference #: RA1-RR-NT	Records Review
Regulation and/or Permit Requirement	
S5.D.2.b of the Permit states, the site map must “show the drainage area for each point.”	
AOC: The Prosser site map did not show the drainage area for each monitoring point.	

AOC Reference #: RA1-RR-NT	Records Review
Regulation and/or Permit Requirement	
S5.D.2.d of the Permit states, the site map must “label whether the discharge is to surface water or groundwater.”	
AOC: The site map did not label if stormwater discharges to surface water or groundwater.	

SECTION V – CLOSING CONFERENCE

I conducted a closing conference with Facility personnel at 12:30 PM. During the closing conference, I discussed observations made during the inspection. I informed the attendees my observations and Areas of Concern have not been evaluated for a formal compliance determination.

SECTION VI – LIST OF APPENDICES

1. Photo Log

APPENDIX: PHOTO LOG

P1010590 – Truck Washout

P1010591 – Stockpiles of Concrete Manufacturing Inputs