

U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW, Atlanta, GA 30303
Water Compliance Inspection Report

FACILITY DATA

NPDES ID: SCR005476

Effective Date: 7/01/2022

Expiration Date: 06/30/2027

Facility Name: Concrete Supply Company, LLC (CSC) - Mauldin

SIC Code: 3273

Address: 1438 Old Stage Road / Simpsonville, SC 29681

On-Site Representative:

Randy Finley, Plant Manager

Email: Randy.Finely@concretesupplyco.com

Office: 864-605-9800

Responsible Official:

Johnie Alexander, Environmental Manager

Email: Johnie.Alexander@concretesupplyco.com

Office: 704-372-2930

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 11/21/2024 at 01:15 PM

Exit Date/Time: 11/21/2024 at 03:25 PM

NAMES OF STATE INSPECTORS

N/A

AREAS EVALUATED DURING INSPECTION *(Check those areas evaluated)*

☒	Permit	☒	Self-Compliance Program	☐	Pretreatment
☒	Records	☐	Compliance Schedule	☒	Pollution Prevention
☒	Facility Site Review	☐	Laboratory	☒	Storm Water
☒	Effluent/ Receiving Waters	☒	Operations & Maintenance	☐	Combined Sewer Overflow
☐	Flow Measurement	☐	Sludge Handling/ Disposal	☐	Sanitary Sewer Overflow

INSPECTION SUMMARY

This was an EPA Compliance Evaluation Inspection (CEI) focusing on the requirements of the South Carolina General Permit for Storm Water Discharges Associated with Industrial Activities.

INSPECTOR SIGNATURE

OFFICE/PHONE NUMBER

**CELINA
RUSSO**

Digitally signed by
CELINA RUSSO
Date: 2025.01.14
12:11:29 -05'00'

Celina Russo, Environmental Engineer

USEPA Region 4/ECAD-WEB-WWES
404-562-9804

**JEREMY
JUDD**

Digitally signed by
JEREMY JUDD
Date: 2025.01.14
18:02:16 -05'00'

Jeremy Judd, Environmental Engineer

USEPA Region 4/ECAD-WEB-WWES
404-562-9505

**AHMAD
DROMGOOLE**

Digitally signed by
AHMAD DROMGOOLE
Date: 2025.01.15
07:49:41 -05'00'

Ahmad Dromgoole, Section Chief
Waterways and Wetlands Enforcement Section

USEPA Region 4/ECAD-WEB-WWES
404-562-9212

NPDES Industrial Stormwater Worksheet (SC)

1. FACILITY LOCATION INFORMATION

GPS Coordinates	Latitude	34.7670442 N	Longitude	-82.2957077 W	
Receiving Water(s) or MS4	Reedy River		Discharge to 303(d) or TMDL waters	No	
Site Acreage	9.47 acres	SIC Code	3272	Weather Condition	Sunny,
Email on NOI	Johnie.Alexander@concretesupplyco.com	Date of NOI	07/12/2022		

2. STORMWATER POLLUTION PREVENTION PLAN (SWPPP) AND SUPPORTING DOCUMENTS

PLAN TOPICS	YES	NO	N/E
SWPPP available on-site Part 5.3 <i>SWPPP binder onsite.</i>	X		
SWPPP Certification Signature/Date Part 5.1.6 <i>Signed/certified by both the company president and environmental manager in October 2023.</i>	X		
SWPPP modified and updated to current conditions Part 5.2 <i>Date of last amendments: 04/16/2024 (which included an amendment for placing a rock berm at outfall 3), 12/05/2023, 11/03/2022, 03/08/2020, 2019, and 2010. The Section under "Facility Description" identified two outfalls. Three outfalls (one of which has been functionally closed) are labeled on the site map.</i>	X		
Pollution Prevention Team named in SWPPP Part 5.1.1 <i>Pollution prevention team consists of plant manager, district/area manager, and the environmental manager. The Appendix included both the names of the individuals in those roles, as well as their contact information.</i>	X		
Site Description Part 5.1.2 <i>Site is a dry concrete batch plant. Only two outfall locations were identified in this section.</i>	X		
Site Map Part 5.1.2.c <i>See photo DSCN3175. The SWPPP map was originally dated 2019, but was redlined with additional modifications, such as the stormwater pond and a rock berm by Outfall 3, which was added in April 2024. Photo DSCN 3176 shows the site map (dated August 2023) from the Facility's SPCC.</i>	X		
Summary of potential pollutant sources / particular pollutants Part 5.1.3 <i>Potential sources identified include cement, fly ash, diesel, ASTs, and raw materials.</i>	X		
Description of the Control Measures Part 5.1.4 <i>Presented in a table, consistent with company SWPPP formatting.</i>	X		
SCHEDULE & PROCEDURES FOR:			
Good Housekeeping Part 5.1.5.1.a.i <i>Is to include weekly sweeping and basin cleanout at 2/3 sump depth. Aggregate storage area is to be cleaned on at least a weekly basis.</i> <i>Facility keeps a weekly sweeping log. For 2024, sweeping was done weekly through 11/15. Logs were also completed on a weekly basis for 2023, 2022, and 2021.</i>	X		

Preventative Maintenance <i>Is to include quarterly inspections</i>	Part 5.1.5.1.a.ii	X		
Spill Prevention and Response <i>(also in SPCC plan).</i>	Part	X		
Employee training <i>To be done annually</i>	Part 5.1.5.1.a.iv / 2.1.2.9	X		
Benchmark Monitoring <i>Schedule is consistent with permit requirements. Specifies that the holding time for pH is 15 minutes and that the pH meter must be calibrated (which is tracked on the sampling report log). If Facility's sampling results are not meeting benchmarks, then the SWPPP states that the current BMPs should be re-evaluated.</i>	Part 5.1.5.2 / 6.1.7	X		
Schedule & Procedures for <u>ROUTINE</u> Inspections <i>Are to be done once per quarter. Template checklists were included.</i>	Part 5.1.5.2.e	X		
Schedule & Procedures for <u>QUARTERLY VISUAL</u> Inspections <i>To be completed once per quarter for the entire duration of the permit.</i>	Part	X		
Schedule & Procedures for <u>ANNUAL COMPREHENSIVE</u> Inspections	Part	X		
Ready-Mix Certification <i>A non-stormwater discharge certification log was signed/completed stating no non-stormwater discharges recorded for 2022, 2023, and most recently on 04/04/2024.</i>	Part 8.E.3	X		

3. SITE DESCRIPTION AND SWPPP

SWPPP identifies two drainage areas: Drainage Area #1 includes raw material storage, diesel fuel tank, and the employee parking lot. Drainage Area #2 includes the batch plant, silos, truck wash, admixtures, etc. on the south and southwest side of the site.

Photo DSCN3179 shows an overview of the yard and batch plant, which drains towards outfall 2 (photo DSCN3181). Concrete blocks were used to create a berm. Approximately one year ago, concrete was poured in front of the blocks to seal the gaps, including outfall 2. Facility personnel stated that this outfall has not discharged since the additional concrete was added; water pools at the low area in front of outfall 2 (photo DSCN3182) until it evaporates.

Facility personnel indicated that the newest pond, shown in photo DSCN3196, was installed following an inspection from SCDHEC. Overflow from this pond discharges to Outfall #3. According to notes on the site map in the SWPPP, this pond (called the stormwater pond) was added in 06/2019 and the wastewater/washout pond was added 05/2019.

RECORD REVIEW – Permit Part 5.4

RECORD REVIEW	YES	NO	N/E
Representative on-site	X		
NOI Submitted to DES <i>Submitted electronically July 2022.</i>	X		
Records available onsite or “readily available” a. Most recent NOI b. Acknowledgement letter from SC c. Permit	X		
Records of incidents with spills, leaks, pollutant releases	X		

Including: dates and description of incident and the corrective actions				
<i>A log is updated annually reporting on incidents for the year. Facility reports no spills for 2016 through 2024. According to the log, on 02/22/2024 the Facility reported an incident in which 25 gal of slur pushed over the wall; 2000 lbs were removed as a corrective action and the pond was cleaned out as a preventative action.</i>				
Records of employee training	Part 5.4.e			
<i>Training rosters complete with employee signatures for 2020, annually, through 2024. The most recent training was done on 09/03/2024. Training materials, which covered both SWPPP and SPCC topics, were kept in the binder.</i>		X		
Records of <u>ROUTINE</u> quarterly inspections	Part 5.4.f			
<i>Routine inspections to check status of housekeeping and BMPs were completed on: 06/14/2024, 02/12/24 (reported rain conditions), 01/29/24 (reported clear weather conditions), 12/01/2023, 08/07/2023</i>		X		
Records of <u>QUARTERLY VISUAL</u> Assessments	Part 5.4.f			
<i>08/07/2023 – reported no discharge from Outfall 1, 2, and 3 12/01/2023 – reported no discharge from Outfall 1, 2, and 3. 01/29/2024 – reported no discharge from Outfall 1 and 2. According to the routine inspection also performed on 01/29, weather conditions were clear. Stormwater discharge should be evaluated during storm events. 02/12/2024 – completed for Outfall 1 and 2; reported no discharge from 3. 06/14/2024 – no discharge for Outfall 1, 2, or 3 Permit 4.2.1 states that, once each quarter for the entire permit term, permittees must collect a stormwater sample from each outfall and conduct a visual assessment.</i>			X	
Records of <u>ANNUAL</u> Comprehensive inspections	Part 5.4.f			
<i>The most recent annual inspection was done on 06/13/2024. Corrective actions identified include addressing erosion under the concrete blocks at Outfall 2 and completing Appendix A in the SPCC.</i>		X		
Records of Benchmark Sampling)	Part 5.4/Part 6			
<i>On 02/12/2024, samples were collected for Outfalls 1 and 2. Both met the benchmarks for pH (8.56 and 8.12 s.u., respectively) and TSS. Permit Part 6.1.6 states that the permittee must monitor on a quarterly basis at least once in each calendar quarter (January 1 – March 31; April 1 – June 30; July 1 – September 30; and October 1 – December 31). Permit Part 6 defines monitoring as the collection and analysis of a stormwater sample during a measurable storm event.</i>			X	
Documentation of any corrective actions (including triggering event)	Part 5.4.h			
<i>A list of corrective actions is generated based on the findings from the annual comprehensive inspection. Dates each corrective action is completed.</i>		X		

5. FIELD EVALUATION & PLAN IMPLEMENTATION

Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies, and pollutants offsite
Loading/Unloading Area	<i>Truck drums are loaded at the location shown in photo DSCN3183 at the batch plant.</i>

Outdoor Storage	<i>Aggregate is stored in three-sided bins (photo DSCN3209). Cement and fly ash are stored in silos at the batch plant. Concrete rubble waiting to be crushed is stored in the pile shown in photo DSCN3207. As needed, a third-party comes onsite to crush the rubble pile. Crushed concrete is stored in piles in three-sided bins at the location shown in photo DSCN3206 while it awaits sale.</i>
Outdoor Manufacturing/ Processing Operations	<i>Facility consists of a concrete batch plant. The area shown in photo DSCN3180 is used for concrete forms. Form release is stored indoors in the neighboring building.</i>
Treatment/Storage/Disposal Areas	<i>As shown in photo DSCN3184, runoff/water from the batch plant drains towards the weir shown in photo DSCN3185. Water from this weir is pumped for recycling either at the batch plant or for rinsing the trucks drums (photo DSCN3186). The pond had adequate freeboard during the inspection. There are gaps by the sump and in the concrete block wall of the pond if it were to overflow. After collecting the recycled water (DSCN3186), truck drums are then emptied at the wastewater pond (photo DSCN3191). Facility personnel noted that this pond is about ready for a cleanout. As shown in photo DSCN3192, some process water was not contained in the pond. An additional view is shown in photo DSCN3193, as well as an additional entrance to the wastewater pond. After settling, water from the wastewater pond drains into a series of two additional ponds (see photo DSCN3208). These ponds are designed to not discharge.</i> <i>When returning from a jobsite, trucks empty leftover concrete at the location shown in photo DSCN3206. Runoff from this area (photo DSCN3203) drains to a low area/pond (photo DSCN3202), which itself is drains towards Outfall #3. Rock dams were installed across the connection (photo DSCN3198).</i> <i>When ponds (including the wastewater pond) are cleaned out, the removed solids are first brought to the pit shown in photo DSCN3195 to dry before being moved to the low area (second stage) shown in photo DSCN3194 to finish drying.</i>
Sediment & Erosion Controls (BMPs)	<i>The area around the plant is paved and swept regularly. Some fines had accumulated around the batch plant (photo DSCN3184), which is graded to drain into the weir system (photo DSCN3185).</i>
Spills / Leaks Handling / Good Housekeeping	<i>Admixture tanks and a tote of DEF are stored in a secondary containment unit (photo DSCN3177), which was not holding any water during the inspection. The unit's valve was closed. Facility personnel stated that they drain the water after a rain if there is no sheen. The facility has a 10,000 gallon double-walled fuel tank for on-road diesel, which is shown in photo DSCN3178). A spill kit was located next to the tank. Facility has two totes of truck wash (visible in photo DSCN3184). The dumpster by the office/batch plant was closed with a lid. Rebar and some scrap are stored at the location shown in photo DSCN3190, where it is awaiting pick-up for recycling. Vehicle maintenance is no longer performed onsite. Hydraulic fluids, antifreeze, and oils are stored indoors by the former maintenance shop. Form release is also kept indoors. As noted above, process water had spilled outside the pond (see photo DSCN3192).</i>

6. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

OUTFALL, STORMWATER, DISCHARGE, & RECEIVING WATER	YES	NO	DESCRIPTION
Number & location of stormwater discharge(s)/outfall(s) consistent with SWP3	X		Outfall #1 is shown in photo DSCN3188. The upgradient view of the rock-lined conveyance to the outfall is shown in photo DSCN3189. Outfall #2 is shown in photo DSCN3181. Leftover concrete was poured along the berm approximately 1 year ago to seal gaps between the concrete blocks. This modification was written onto the site map. Facility reports no discharge through this outfall since the concrete addition. As shown in photo DSCN3182, water collects in this location until it evaporates. Outfall #3 is shown in photo DSCN3199 and the upgradient view (and rock berm) is shown in photo DSCN3198. Outfall #3 discharges runoff from along perimeter berm (photo DSCN3200), the large stormwater pond in the southeastern corner (photo DSCN3201), and from the pond shown in photo DSCN3202.
Evidence of off-site accumulation of pollutants observed in receiving water		X	None observed.
Non-stormwater discharge observed		X	None was observed.

Exit interview conducted with: Mr. Finley; Mr. Wayne Amaker joined for the closing conference portion of the inspection.

Preliminary findings discussed during the exit interview included:

- Inspection report will be sent via email in 60 days
- Housekeeping: two areas to watch to prevent comingling include the spillage at the washout pond and flow from around the rubble pile.
- Comprehensive inspections will be emailed to inspectors following the inspection.

Photo Log is attached.