



Region 10 Enforcement and Compliance Assurance Division

1200 6th Avenue

Seattle, WA 98101

INSPECTION REPORT

Inspection Date:	05/25/2021	
Time:	Entry: 1:00 p.m.	Exit: 3:06 p.m.
Weather:	Periodic overcast with evidence of recent precipitation	
Media:	Clean Water Act (CWA)	
Regulatory Program:	CWA NPDES/Industrial Stormwater	
Permittee Name(s):	Clyde Companies (Sunroc Corporation)	
Permittee Addresses:	501 E. 41st St. (Sunroc Corporation)	
Permittee City, State, Zip Code:	Garden City, ID 83714	
Facility Name:	Maddens Facility	
Facility Physical Location:	10340 US-20/26	
	Latitude/Longitude	43.6666°, -116.6018°
City, State, Zip Code:	Caldwell, ID 83605	
Facility Contact(s):	Tim Henderson, Crew Lead Phone: (208) 343-6965 Email: Not provided	
County:	Canyon County, Idaho	
NPDES Permit:	2015 EPA Multi-Sector General Permit (MSGP)	
EPA Facility Identifier:	IDR053240	
Industrial Sector:	Sector E: Glass, Clay, Cement, Concrete, and Gypsum Product Manufacturing Facilities	
Subsector:	E1, Concrete Product Manufacturers	
Primary SIC Code(s):	3271 – 3273, Concrete Block to Ready-Mixed Concrete	
Facility Receiving Water(s):	Unnamed Irrigation Ditch, the Lower Fivemile Drain (1st Order tributary to Fifteenmile Creek), and Mason Creek	
Facility Receiving Water(s) Description:	Ditch, Creek	
Inspector(s):		
Anthony D'Angelo – PG Environmental	U.S. EPA Contract Inspector (Lead Inspector)	(720) 789-8049
Signature: 		Date: 07/28/2021
Charissa Bujak – EPA Region 10	U.S. EPA Inspector	(208) 378-5754
Aaron Harnsberger	IDEQ Compliance Officer	(208) 236-6160
Brett Morrison	IDEQ Compliance Officer	(208) 373-0269

EPA Region 10 Recipient: Brian Levo	
Signature:	Date:

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Section I – Inspection Information

Purpose and Scope of the Inspection

On May 25, 2021, I, Anthony D'Angelo, a U.S. Environmental Protection Agency (EPA) Contract Inspector, along with U.S. EPA inspector Charissa Bujak (hereafter, we or Inspection Team) conducted an industrial stormwater inspection of the Clyde Companies' (Sunroc Corporation's) Maddens Facility (hereafter, Permittee or Facility) in Caldwell, Idaho. We were accompanied by two compliance officers for the Idaho Department of Environmental Quality (IDEQ), Aaron Harnsberger and Brett Morrison. The purpose of the inspection was to determine compliance with the requirements of EPA's National Pollutant Discharge Elimination System (NPDES) 2015 Multi-Sector General Permit for Discharges of Stormwater Associated with Industrial Activities (hereinafter, the MSGP or Permit). The Permittee is authorized to discharge stormwater under the Permit under NPDES Permit No. IDR053240. The inspection consisted of two parts: a preliminary records review and a Facility walk-through. Photographs taken by the Inspection Team during the Facility walk-through are included in [Attachment A](#). Exhibits are included in [Attachment B](#). The Inspection Team requested digital copies of the Facility records reviewed during the inspection and performed a more thorough review after the inspection.

Opening Conference

I provided a notice of inspection, via phone call, to the Sunroc Corporation's Notus, Boise River Rd. Facility on the morning prior to the inspection at approximately 8:00 a.m. I spoke with Christie Wood (Sunroc Corporation, Notus) who stated that she would notify the Maddens Facility staff of the inspection. Upon arriving at the Facility at 1:00 p.m. on the day of the inspection, we met Tim Henderson (Crew Lead, Sunroc Corporation) at the main administrative building to begin the inspection. Charissa Bujak and I presented our inspector credentials to Mr. Henderson. Mr. Henderson explained that he had recently taken over responsibility of NPDES compliance at the Facility and was assisted by Sunroc Corporation corporate environmental compliance staff. He also explained that NPDES compliance activities at the Facility such as inspections, monitoring, and reporting NPDES compliance data to EPA are conducted by a consultant: Syman, LLC. Representatives from Syman, LLC were not present during the inspection.

During the opening conference, we held brief discussions with Mr. Henderson regarding the Facility's operations, industrial activities, stormwater inspections and monitoring, employee training program, corrective actions, and recordkeeping. Mr. Henderson stated that the Facility has not discharged from Outfall 001, the only stormwater outfall, since 2017.

We briefly reviewed Permit-required records that were located onsite, including the Facility's Notice of Intent (NOI) and stormwater pollution prevention plan (SWPPP). The Facility SWPPP was dated November 7, 2018. Mr. Henderson confirmed during the inspection that the Permittee would be submitting a NOI to EPA for coverage under the 2021 MSGP on May 30, 2021. Following the inspection, electronic documentation reviewed onsite were provided to the Inspection Team electronically for additional review.

Following the opening conference, we proceeded outdoors with Mr. Henderson to conduct the Facility walk-through. Near the end of the Facility walk-through, we were accompanied by Troy Harvey (Operations Manager, Sunroc Corporation).

Facility Description

The Facility is a ready-mix concrete batch plant located on the north side of US-20/26, approximately 4 miles east of Caldwell, ID (refer to Photograph 1, and Exhibits 1 through 3). The property is 45.59 acres, with 10 acres on the south side leased to two separately owned building materials businesses. The Permittee owned and operated facilities include an administrative/maintenance building, fuel island, truck wash station, trucking parking areas, concrete batch plant, aggregate storage piles, chemical storage areas, and a stormwater retention pond. The property is bordered by US-20/26, a commercial building to the south, and farmland to the east, west, and north. A rail line runs along the eastern perimeter of the property and is used to bring raw materials into the Facility.

The Facility SWPPP states that “the site is graded and berms have been placed along the lower property limits so that stormwater will be retained on site.” Stormwater runoff from the Facility (and leased properties to the south) flows north to an onsite stormwater retention basin in the northern corner of the property (refer to Photographs 2 through 5). The overflow of this basin is identified as Outfall 001 (refer to Photograph 6). Mr. Henderson explained that this was the only known stormwater discharge point for the property and that stormwater runoff discharged from this outfall would flow north along the railroad right-of-way and enter the Lower Fivemile Drain located approximately 700 feet to the north of the property line (refer to Photograph 7). However, as previously stated, Mr. Henderson explained that stormwater last discharged through Outfall 001 in 2017. In 2018, the stormwater retention basin was expanded to retain all stormwater on site.

According to the SWPPP, the Unnamed Irrigation Ditch referenced on the Facility’s NOI runs along the south property line, and Mason Creek is located 2,215 feet west from the site entrance off US-20/26.

Stormwater discharged from the Facility subsequently flows into the lower section of the Boise River that is designated as impaired for sediment, phosphorous, and fecal coliform bacteria. As required by Part 6.2.4 of the MSGP, Discharges to Impaired Waters Monitoring, the Facility is required to conduct quarterly benchmark monitoring for total suspended solids (TSS), total phosphorus (TP), and E. coli to meet target values, identified in a written notice from EPA Region 10 to the Permittee in 2017. The Facility is subject to additional quarterly benchmark monitoring for TSS and total iron as well as annual Effluent Limitations Guidelines and Standards (ELG) monitoring for TSS and pH. Mr. Henderson explained that all NPDES compliance sampling and inspections are conducted by Syman, LLC. He added that the Facility has not discharged stormwater through Outfall 001 since 2017; therefore, impaired waters, benchmark, and ELG monitoring has not been conducted at the Facility since then.

Documents Requested During Inspection

Due to the ongoing COVID-19 pandemic, the Inspection Team confirmed that Facility documentation was available at the time of the inspection, but we did not review the documentation in detail while on

site. The Inspection Team obtained electronic copies of the following documents from Kamren Garfield (Sunroc Corporation) shortly after the inspection. It should be noted that visual monitoring and discharge monitoring records were not provided or reviewed because the Facility did not discharge stormwater during the period of review (2018-2021). Documents used to support observations presented in Section II of this report are included in Appendix B, Exhibit Log and are referenced where applicable.

- Stormwater Pollution Prevention Plan (SWPPP), November 7, 2018
- SWPPP Inspection Reports, 2018-2021
- Daily water truck logs
- Daily “See/No See” fugitive dust logs

Section II – Observations

Following the opening conference, the Inspection Team and IDEQ compliance officers, accompanied by Mr. Henderson, began the Facility walk-through at the Facility’s maintenance building. At the time of the inspection, the weather was partly overcast with temperatures in the 60s. Precipitation fell at the Facility on the morning before the inspection. Inside the maintenance building, we observed a trench drain that ran the length of the maintenance bays. Mr. Henderson confirmed with maintenance staff that this trench drain flows north and is connected to a subsurface infiltration structure located north of the maintenance building and adjacent fuel island (refer to Photograph 8).

We observed an outdoor washing area located on the outside of the maintenance building’s northern wall. Mr. Henderson confirmed that this wash area also drains to the subsurface infiltration structure located to the north (refer to Photograph 9). Near the fuel island and subsurface infiltration structure, we observed a grated storm drain inlet with a casted message “Outfall to Stream. Dump No Pollution” (refer to Photographs 10 and 11). Mr. Henderson confirmed this storm drain also leads to the subsurface infiltration structure.

We then walked north along the Facility’s western perimeter and observed the concrete truck parking area and aggregate storage areas (refer to Photographs 12 and 13). At the northern portion of the Facility, we observed the stormwater retention basin and adjacent Outfall 001. We did not observe evidence of discharge from the stormwater retention basin (refer to Photographs 2 through 6). Next, we proceeded south along the Facility’s eastern perimeter and observed an outdoor truck wash rack that drained across the ground surface into an impervious valley gutter. The valley gutter flows north into the stormwater retention basin (refer to Photographs 15 and 16).

We then continued south and observed the concrete batch plant, the associated chemical storage area, and the wash water recycling system, which was comprised of five settling bays and a drying basin. The wash water recycling system appeared in working order (refer to Photographs 17 through 19). We concluded the Facility walk-through at the administrative/maintenance building.

For a list of areas of concern identified from the Inspection Team’s review of Permit-required documents and onsite Facility walk-through, refer to Section III, Areas of Concern.

Section III – Areas of Concern

The presentation of areas of concern in this report does not constitute a formal compliance determination or Permit violation. An area of concern is an observation about Facility protocols or conditions that may be inconsistent with the requirements of the Permit. The Inspection Team noted areas of concern in both the records review performed post-inspection and the onsite Facility walk-through.

1. Part 2.1.2.5 Erosion and Sediment Controls.

You must minimize erosion by stabilizing exposed soils at your facility in order to minimize pollutant discharges and placing flow velocity dissipation devices at discharge locations to minimize channel and streambank erosion and scour in the immediate vicinity of discharge points. You must also use structural and non-structural control measures to minimize the discharge of sediment.

Area of Concern 1a

During the inspection, we observed waste concrete piles on the south side of the stormwater retention basin ([refer to Photograph 5](#)). It was unclear if the stockpiles were diminishing the capacity of the retention basin. Mr. Henderson stated that concrete waste that cannot be recycled and settled material excavated from the retention basin are stockpiled in this location until it is eventually hauled offsite for disposal. Section 3.1.5, Erosion and Sediment Controls, of the SWPPP states, “The retention pond at the northernmost end of the site is scheduled to be expanded. The addition will have the topsoil removed and placed as berms along the edges of the pond.” At the time of the inspection, the expansion of the basin had been completed and topsoil berms were in place.

Area of Concern 1b

During the inspection, we observed evidence that sediment had mobilized from aggregate stockpiles into the valley gutter on the west side of the Facility that flows north into the northwestern side of the stormwater retention basin ([refer to Photographs 12 and 13](#)). Control measures were not in place to prevent sediment from mobilizing into this valley gutter. Section 3.1.5, Erosion and Sediment Controls, BMP #7 of the SWPPP states, “Stockpile management procedures and practices are designed to reduce or eliminate air and stormwater pollution from stockpiles of soil, aggregates, paving materials such as Portland Cement Concrete rubble, asphalt concrete, asphalt concrete rubble, aggregate base, aggregate sub-base or pre-mixed aggregate. The stockpiles should be placed in an area where sediment from precipitation will not be discharged to waters of the US.”

2. Part 2.1.2.1 Minimize Exposure.

You must minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff in order to minimize pollutant discharges by either locating these industrial materials and activities inside or protecting them with storm

resistant coverings...Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray.

Area of Concern 2a

We observed uncontained concrete washout waste on the ground surface along the northeastern perimeter, upgradient of the stormwater retention basin and Outfall 001 (refer to Photograph 14). Mr. Henderson stated this was not an approved washout location and that concrete truck drivers are educated to only wash out in authorized locations.

Area of Concern 2b

We observed an uncovered truck wash rack area on the northeast side of the Facility that drains to the stormwater retention basin (refer to Photograph 15). Wash water from the wash rack falls onto the surrounding gravel surface. Any runoff from the operation would collect in a downgradient valley gutter and be conveyed north to the northeastern side of the stormwater retention basin, upgradient of Outfall 001. We also observed the storage of concrete stripping chemicals at this wash rack. Due to recent precipitation experienced at the Facility, the secondary containment units for chemicals in this area were full of stormwater (refer to Photograph 16). The SWPPP does not identify this particular vehicle wash rack or concrete stripper storage area (refer to Exhibit 3). The SWPPP also does not identify a wash water contribution to the stormwater retention basin.

3. Part 2.1.2.8 Employee Training.

You must train all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of your stormwater pollution prevention team.

Area of Concern 3

Employee training records were not available onsite for review, and Mr. Henderson was unaware of the last stormwater training for Facility staff. Section 4.5 of the SWPPP states, "Training Activities will be recorded and kept as part of the SWPPP in Appendix I. All training logs will include the date of the training, number and names of attendees, subjects covered, and length of training." At the time of the inspection, Appendix I of the onsite SWPPP was blank. Training for the Syman, LLC employees conducting inspections and sampling was not discussed with Mr. Henderson.

4. Part 2.1.2.8 Part 5.2.2, Site Description, includes SWPPP requirements for a site map, including:

- Locations of all stormwater control measures,
- Locations of all stormwater conveyances including ditches, pipes, and swales,
- Locations used for the treatment, storage, or disposal of wastes,
- Vehicle and equipment maintenance and/or cleaning areas,
- Liquid storage tanks,

- Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility.

Area of Concern 4

The SWPPP site map was not reflective of Facility conditions at the time of the inspection. During the inspection, I observed the following areas and features at the Facility that were not identified on the SWPPP site map:

- Storm drain inlet and associated onsite subsurface infiltration structure described by Mr. Henderson (refer to Photographs 10 and 11).
- Impervious valley gutters that run north on both the east and west sides of the batch plant and aggregate stockpile that flow into the stormwater retention basin in the northern corner of the Facility (refer to Photographs 12, 13, and 15).
- Hardened and excavated concrete waste piles located on the southern edge of the stormwater retention basin (refer to Photograph 5).
- Outdoor washing area on the north side of the maintenance building (refer to Photograph 9).
- Uncovered truck wash rack and associated concrete stripper storage area on the northeast side of the Facility (refer to Photographs 15 and 16).
- Bulk chemical storage tanks of calcium chloride, phosphoric acid, and concrete additives at the batch plant (refer to Photograph 17).
- Rail line along the Facility's eastern perimeter that brings raw materials to the Facility (refer to Photographs 6, 7, and 14).

Section IV – Closing Conference

We held a closing conference with Mr. Henderson at the conclusion of the inspection. Following the inspection, I held a brief call with Kamren Garfield (Sunroc Environmental Compliance) to discuss some of the observations and request additional records. I explained to Mr. Garfield that the summary of observations (i.e., areas of concern) was “preliminary” and subject to addition, deletion, and/or modification.

- Area of Concern 1a –We observed waste concrete piles on the south side of the stormwater retention basin that may have been diminishing the capacity of the basin.
- Area of Concern 1b –We observed sediment that had mobilized from aggregate stockpiles into the valley gutter that flows north into the northwestern side of the stormwater retention basin.
- Area of Concern 2a – We observed uncontained concrete washout waste on the ground surface along the northeastern perimeter, upgradient of the stormwater retention basin and Outfall 001.
- Area of Concern 2b – We observed an uncovered truck wash rack area and associated concrete stripper storage area on the northeast side of the Facility that appears to drain to the stormwater retention basin.
- Area of Concern 3 – Employee training documentation was not available for review at the time of the inspection.
- Area of Concern 4 – The SWPPP site map was not reflective of Facility conditions at the time of the inspection.

The inspection concluded at 3:06 p.m.

Attachment A – Photograph Log

The photographs below were taken during the inspection by Mr. Anthony D'Angelo, PG Environmental, U.S. EPA Contractor, using a Panasonic Lumix DMC-TS6 digital camera. Original copies of the photos are on file.

Note: Photo time stamps shown are Eastern Daylight Time (EDT).



Photograph 1. View of the Facility sign.



Photograph 2. View, facing east, of the stormwater retention basin in the northern corner of the Facility. Outfall 001 is located at the basin's spillway on the northeast corner.



Photograph 3. View, facing south, of the inlet on the west side of the stormwater retention basin. A valley gutter that runs north between the concrete truck parking area and aggregate stockpiles enters the basin at this location.



Photograph 4. View, facing south, of the inlet on the east side of the stormwater retention basin. A valley gutter that runs north between the aggregate stockpiles and the Facility's eastern perimeter enters the basin at this location.



Photograph 5. View, facing southwest, of concrete waste stockpiles on the south side of the stormwater retention basin (between the two inlets to the basin) shown in Photographs 3 and 4.



Photograph 6. View of the overflow point of the stormwater retention basin, noted as Outfall 001. Red dotted arrow indicates flow direction from Outfall 001 to the Lower Fivemile Drain.



Photograph 7. View, facing north from Outfall 001, of the stormwater flow pathway along the railroad right-of-way from Outfall 001 toward the Lower Fivemile Drain.



Photograph 8. View, facing north inside the maintenance building, of a trench drain that flows to an onsite subsurface infiltration structure located north of the maintenance building and adjacent fuel island.



Photograph 9. View, facing east, of an outdoor wash area located north of the maintenance building. Note the hose and 55-gallon drum of muriatic acid. This wash drain flows to the onsite subsurface infiltration structure located north of the maintenance building.



Photograph 10. View, facing west, of a storm drain near the fuel island that is north of the maintenance building and outdoor wash area shown in Photographs 8 and 9. Mr. Henderson confirmed that this storm drain is connected to the onsite subsurface infiltration structure.



Photograph 11. Close-up view of the storm drain shown in Photograph 10. This grate is casted with the message "Outfall To Stream. Dump No Pollution".



Photograph 12. View, facing north, of the valley gutter that flows north to the stormwater retention basin, located along the west side of the Facility between the concrete truck parking area and aggregate stockpiles.



Photograph 13. View, facing east, of sediment in the valley gutter adjacent to the aggregate stockpiles shown in Photograph 12. Control measures were not in place to prevent sediment from the aggregate stockpiles from entering this valley gutter.



Photograph 14. View, facing north, of the concrete washout waste on the ground surface in the northeastern portion of the Facility, upgradient of the stormwater retention basin and Outfall 001.



Photograph 15. View, facing south, of an uncovered truck wash rack located in the northeastern portion of the Facility. Wash water from this wash rack would appear to flow over the gravel surface, into the valley gutter, and subsequently into the stormwater retention basin.



Photograph 16. View, facing east, of concrete stripping chemicals stored at the truck wash rack shown in Photograph 15. Note this wash rack is not identified on the SWPPP site map. Due to recent heavy precipitation, the secondary containment units were full of stormwater.



Photograph 17. View, facing north, of the bulk chemical storage area at the batch plant. This chemical storage area is not identified on the SWPPP site map.



Photograph 18. View of the wash water recycling system, which was operational at the time of the inspection.



Photograph 19. View, facing south, of the aggregate and waste concrete drying basin south of the wash water recycling system shown in Photograph 18. Settled solids from the wash water recycling system settling bays, as well as other wet concrete waste, is allowed to dry and harden in this basin.

Attachment B – Exhibit Log

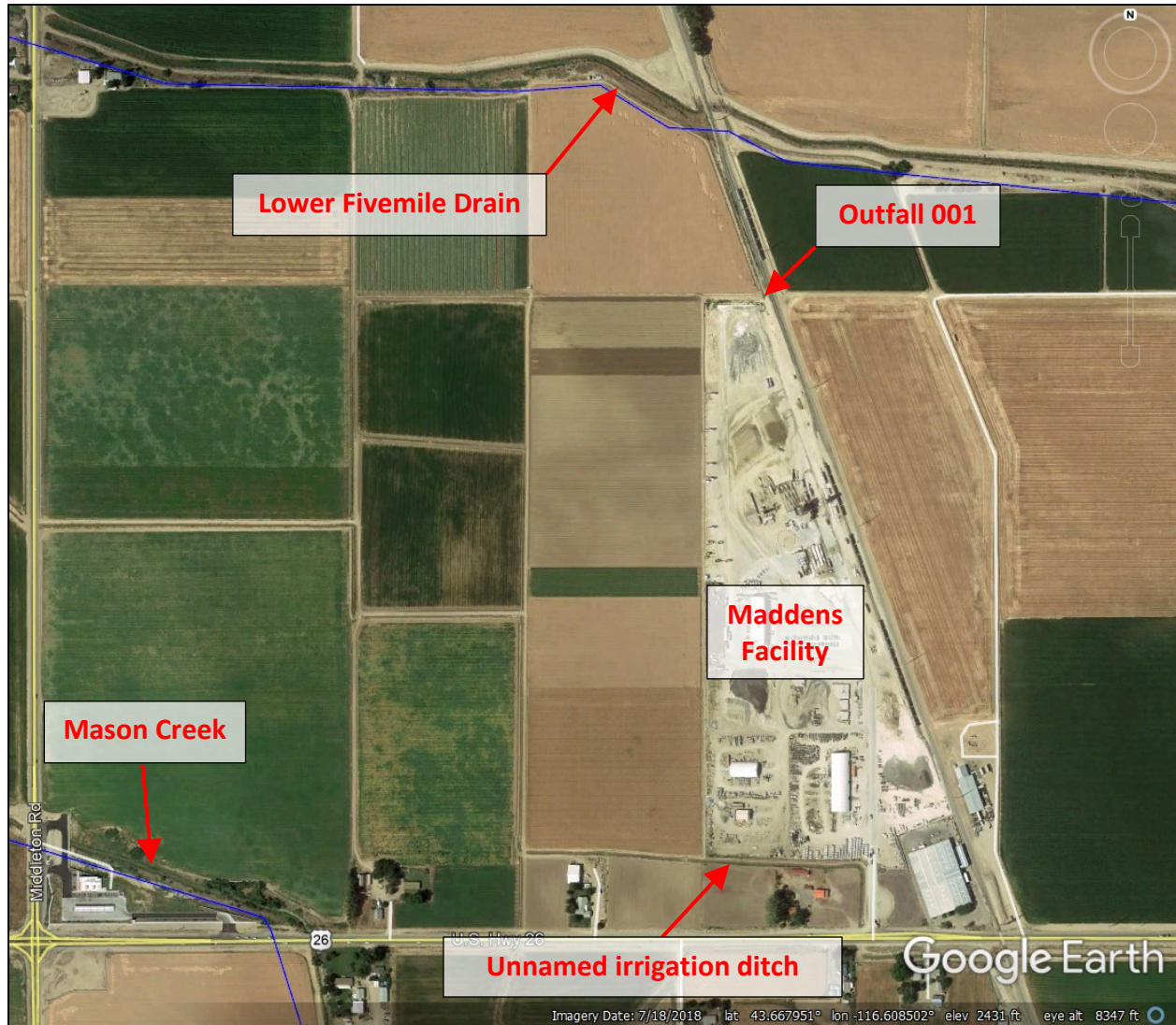


Exhibit 1. Google Earth Pro image of the Facility (imagery date: 7/18/2018). Facility features and boundaries are approximated for reference.

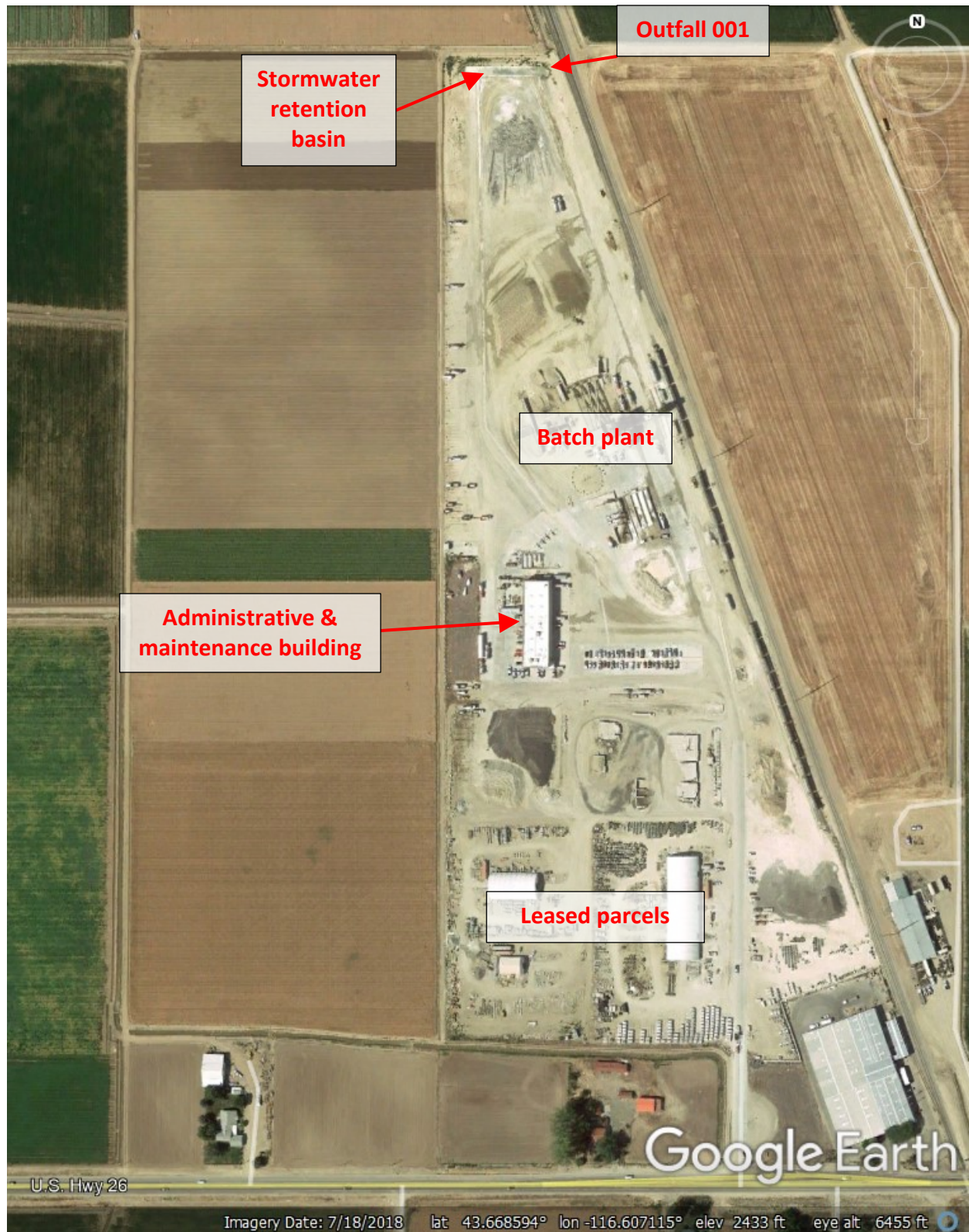


Exhibit 2. Google Earth Pro image of the Facility (imagery date: 7/18/2018). Facility features are approximated for reference.

Maddens Facility
Industrial Stormwater Inspection Report

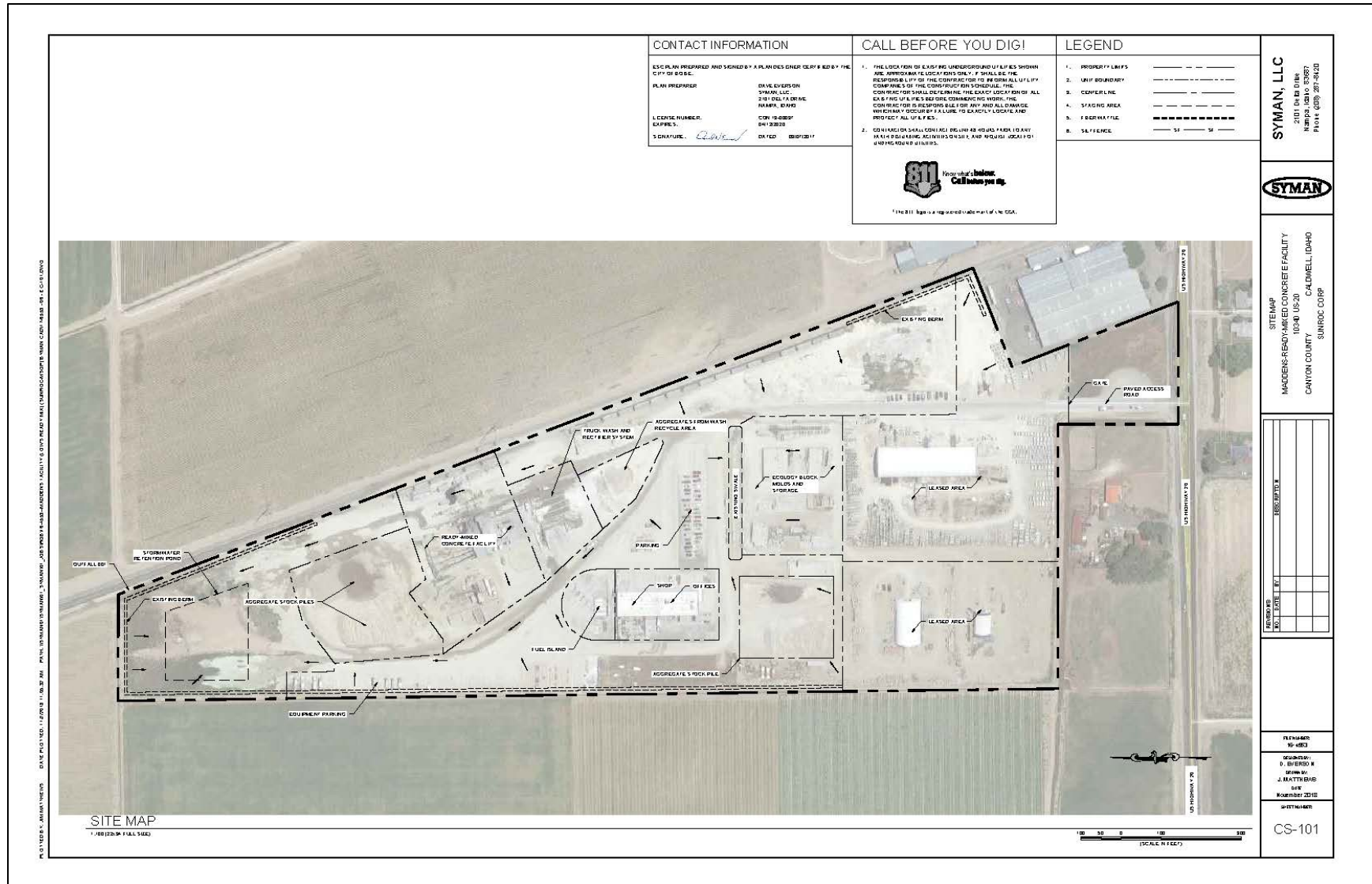


Exhibit 3. SWPPP Site Map (map dated November 2018). The SWPPP Site Map was missing several elements required by the Permit (see Section III – Areas of Concern).