

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

FACILITY DATA

NPDES ID: NCG140043 **Effective Date:** 07/01/2022 **Expiration Date:** 06/30/2027

Facility Name: Concrete Supply Company, LLC (CSC) – South Plant (Charlotte) **SIC Code:** 3273 / E / E2

Address: 400 Minute Lane, Charlotte, NC 28210

On-Site Representative:
Adam Georgia Loren Wild
Plant Lead Area Manager
o: 704-527-1387 o: 704-309-4418

Responsible Official:
Johnie Alexander, Environmental Manager
Email: Johnie.Alexander@concretesupplyco.com
Office: 704-372-2930

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 01/13/2025 at 01:30 PM **Exit Date/Time:** 01/13/2025 at 03:15 PM

NAMES OF STATE INSPECTORS

Lily Kay Brett Saunders
Lily.Kay@deq.nc.gov Brett.Saunders@deq.nc.gov

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 a joint EPA and NC DEQ stormwater Compliance Evaluation Inspection (CEI) focusing on the requirements of the North Carolina General Permit for Storm Water Discharges Associated with Industrial Activities (General Permit No. NCG140000).

INSPECTOR SIGNATURE

OFFICE/PHONE NUMBER

JEREMY JUDD Digitally signed by JEREMY JUDD Date: 2025.04.09 08:17:49 -04'00'	USEPA Region 4/ECAD-WEB-WWES 404-562-9505
Jeremy Judd, Environmental Engineer	
LONNIE DORN Digitally signed by LONNIE DORN Date: 2025.04.10 10:29:28 -04'00'	USEPA Region 4/ECAD-WEB-WWES 706-355-8683
Lonnie Dorn, Life Scientist	
AHMAD DROMGOOLE Digitally signed by AHMAD DROMGOOLE Date: 2025.04.14 15:40:36 -04'00'	USEPA Region 4/ECAD-WEB-WWES 404-562-9212
Ahmad Dromgoole, Section Chief Waterways and Wetlands Enforcement Section	

NPDES Industrial Stormwater Worksheet (North Carolina - General Permit No. NCG140000)

1. FACILITY LOCATION INFORMATION					
GPS Coordinates	Latitude	35.1564488° N	Longitude	-81.8827296° W	
Receiving Water(s) or MS4	Unnamed Tributary to Kings Branch / Sugar Creek / Catawba River		Discharge to 303(d) or TMDL waters	No	
Site Acreage	7.5 acres	SIC Code	3272 / E / E2	Weather Condition	Sunny, clear
Email on NOI	Johnie.Alexander@concretesupply.co.com	Date of NOI	09/12/2022		

2. SITE DESCRIPTION
The CSC facility in Charlotte, NC is a ready-mix plant. The process includes a batch concrete process where a predetermined amount of aggregates, cement, fly ash, and admixture are mixed in a central mixer. The final products are then loaded from the central mixer directly into each individual concrete truck. All the runoff from the production area drains toward the east side of the facility and collects in a concrete ditch. Wastewater and stormwater from the ditch are pumped through a CO₂ treatment system for pH adjustment prior to discharge via outfall #1.

3 STORMWATER POLLUTION PREVENTION PLAN (SWPPP) AND SUPPORTING DOCUMENTS			
PLAN TOPICS – Section B of Permit	YES	NO	N/E
SWPPP available on-site Part B.18	X		
SWPPP prepared by Chalam Pakala Engineering and Environmental Solutions			
SWPPP Certification Signature/Date Part B.1 / Part J	X		
Responsible Party / Pollution Prevention Team named in SWPPP Part B.1	X		
Section 7 of the SWPPP: Team consists of ENV Manager, District/Area Manager, and Plant Manager			
General Location Map Part B.2	X		
Site Map Part B.3	X		
Narrative Description of Industrial Processes Part B.4	X		
Section 4.2 of the SWPPP: industrial facility is a central mix plant that consists of aggregate storage bins, 2 cement silos, 1 fly ash silo, conveying equipment, and weighing equipment.			
Feasibility Study Part B.5	X		
Evaluation of Stormwater Outfalls Part B.6	X		
Stormwater BMP Summary Part B.7	X		
Section 10 of the SWPPP indicates the Pollution Measures and BMPs implemented at facility			

3 STORMWATER POLLUTION PREVENTION PLAN (SWPPP) AND SUPPORTING DOCUMENTS

PLAN TOPICS – Section B of Permit	YES	NO	N/E
Secondary Containment Plan Part B.8 The facility does not include a secondary containment plan as part of the SWPPP. A SPCC plan, if applicable, was not provided or made available for review. The facility does have a 6,000 gallon AST and a few 55-gallon drums stored onsite.		X	
Spill Prevention and Response Procedures Part B.9 Section 4.7 Oil and Other Storage Management, Section 11 Spill Response and Section 12 Reporting Spills are documented in the SWPPP.	X		
Solvent Management Plan Part B.10 The facility does not include a solvent management plan as part of the SWPPP. Please note, that if solvents are not stored or used onsite, the owner must certify that in the SWPPP. No certification was made available for review.		X	
Preventative Maintenance and Good Housekeeping Program Part B.11 Section 10 of the SWPPP indicates Pollution Measures and BMPs implemented at facility	X		
Employee Training Part B.12 <i>Documentation indicates training occurred on the following dates: 12/28/2021; 10/03/2022; 10/02/2023; and 10/07/2024</i>	X		
Representative Outfall Status Part B.13			X
Annual SWPPP Review and Update Part B.14 SWPPP has been documented of having been reviewed and revised for the following dates: 10/25/2019; 3/12/2020; 12/15/2020; 10/1/2021; 10/13/2022; 02/16/2023; 04/09/2024; 10/22/2024; and 11/25/2024.	X		
Notice to Modify the SWPPP Part B.15 Facility has not received any notice to modify the SWPPP from NC DEQ			X
OPERATIONAL REQUIREMENTS – Section C of Permit	YES	NO	N/E
Operation and Maintenance of Treatment and Control Systems Part C.1	X		
Stormwater Control Measure Clean Out Part C.2	X		
Polyacrylamides and Flocculants Part C.3 PAMS and Flocculants shall be selected from the NC Division of Water Resources of approved PAMS/Flocculants list.			X
Residuals Management Part C.3	X		
Corrective Actions Part C.4	X		
QUALITATIVE MONITORING OF STORMWATER DISCHARGES - Section D of Permit	YES	NO	N/E
Visual Inspections Part D.1	X		
Qualitative Monitoring Response Part D.2	X		
ANALYTICAL MONITORING OF STORMWATER DISCHARGES – Section E of Permit	YES	NO	N/E

3 STORMWATER POLLUTION PREVENTION PLAN (SWPPP) AND SUPPORTING DOCUMENTS

PLAN TOPICS – Section B of Permit		YES	NO	N/E
Required Baseline Sampling	Part E.1	X		
Tier One Response – Status	Part E.5			X
Tier Two Response – Status	Part E.6			X
Tier Three Response – Status	Part E.7			X
SUBMITTAL OF DISCHARGE MONITORING REPORTS – Section H of the Permit		YES	NO	N/E
Qualitative Monitoring Reports	Part H.10	X		
Monitoring Report Retention	Part H.11	X		
OTHER OCCURENCES THAT MUST BE REPORTED – Section I of the Permit		YES	NO	N/E
Visible Sediment deposition in a stream or wetland	Part I Table 7		X	
Oil Spills	Part I Table 7		X	
Documents indicate no history of oil spills or leaks.				
Hazardous Substances	Part I Table 7		X	
Anticipated bypasses	Part I Table 7			X
Unanticipated bypasses	Part I Table 7			X
Noncompliance with the conditions of the Permit	Part I Table 7		X	

4. FIELD EVALUATION & PLAN IMPLEMENTATION

Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies, and pollutants offsite
Loading/Unloading Area	Raw materials arrive by trucks. Aggregate and sand are stored in 3-sided concrete bins, while cement and fly ash are pneumatically pumped into silos.
Outdoor Storage	The 3-sided concrete bins for aggregate and sand were open to precipitation.
Outdoor Manufacturing/Processing Operations	Not Applicable
Treatment/Storage/Disposal Areas	Storage and Disposal areas are located on site and open to precipitation.
Sediment & Erosion Controls (BMPs)	Observed minor dust control concerns/issues at the site. Observed minor sediment track out at the entrance / exit.

4. FIELD EVALUATION & PLAN IMPLEMENTATION

Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies, and pollutants offsite
Spills / Leaks Handling / Good Housekeeping	No evidence of spills or leaks were observed onsite. The facility is generally in good and orderly with regards to good housekeeping.

5. 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		One outfall was observed, as reflected in the SPPP.
Evidence of off-site accumulation of pollutants observed in receiving water		X	
Non-stormwater discharge observed		X	

Exit interview conducted with: Johnnie Alexander, Adam Georgia, and Loren Wild

Preliminary findings discussed during the exit interview included:

1. SWPPP appears to be updated to reflect current industrial activities and operations
 - a. Verify if SWPPP has secondary containment plan section or a SPCC for the facility. This section would be different from Section 12 Spill Response in the current SWPPP.
 - b. Verify if SWPPP needs a Solvent Management Plan
2. Quarterly Good Housekeeping/BMP Inspections have been documented on a consistent and regular basis
3. Stormwater Analytical results were made available when a discharge occurred at the outfall
 - a. Last monitoring results from 11/18/2024 indicate a pH of 7.7 and TSS of 9.7 mg/L
4. Training appears to be conducted on an annual basis for employees
 - a. Ensure new employees receive training as well as employees on an annual basis

Preliminary findings noted after the exit interview included:

1. Observed minor dust control concerns/issues at the site.
2. Observed minor sediment track out at entrance / exit
3. Verify if the facility has a SPCC and/or Secondary Containment Plan within the SWPPP

Photo Log is attached.