

REPORT OF COMPLIANCE EVALUATION INSPECTION
(INDUSTRIAL STORMWATER)

Iowa Specialties, Inc.
824 and 809 27th Ave. SW
Cedar Rapids, Iowa 52404
Authorization Number: **IA-0208-0135**

BY
U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)
WATER BRANCH/DRINKING WATER & INSPECTIONS SECTION (WB/DWIS)

ON
February 7 and 8, 2024

Introduction

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Compliance Evaluation Inspection (Industrial Stormwater) was conducted on February 7 and 8, 2024, at the Iowa Specialties, Inc. facility in Cedar Rapids, Iowa. The inspection was conducted under the authority of Section 308 of the Clean Water Act, as amended. It was conducted in accordance with the U.S. Environmental Protection Agency (EPA) Region 7 Standard Operating Procedures for Compliance Inspections (ENST SOP No. 2332). This narrative report presents the findings of the inspection.

Participants

Iowa Specialties, Inc.

- Kevin Dixon, President iowaspecialties@aol.com

U.S. Environmental Protection Agency (EPA), Region 7

- Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS
- Connor Finn, Life Scientist, ECAD/WB/DWIS

Inspection Procedures

Connor Finn and I arrived at the Iowa Specialties, Inc. facility in Cedar Rapids, Iowa on February 7, 2024, at 9:30 AM. We met with Kevin Dixon. We introduced ourselves, presented our credentials, and explained the purpose and procedures of the industrial stormwater compliance evaluation inspection. These included completing the Region 7 Industrial Stormwater Worksheet and the U.S. EPA Confidentiality Notice, evaluating self-monitoring and stormwater management practices, and conducting a facility walk-through with photographs (Attachment 7). I provided Kevin Dixon with the U.S. EPA Small Business Resources Information Sheet and the U.S. EPA Confidentiality Notice. The Facility chose not to claim any confidential business information.

Kevin Dixon presented us with the Stormwater Pollution Prevention Plan (SWPPP) folder that included the SWPPP document, training records, site map with drainage patterns, site inspection reports, and other stormwater management documents.

After a brief description of the site operations and a brief review of the SWPPP and stormwater management records, Kevin Dixon escorted Connor Finn and I on a visual inspection of the site.

We started our inspection at the outdoor storage area west of the manufacturing building located at 824 27th Ave SW on the north side of 27th Ave SW. (photos 1 and 2), then we inspected the manufacturing process inside the Manufacturing building (photos 3 and 4); we looked at the outdoor storage yard east of the Manufacturing building where we observed an oily substance on the ground and evidence of the substance flowing east onto the steep cliff (photos 5-12); we continued our walkthrough and looked at the waste/chemical storage building (photos 13-14), then we looked at the paint/blast shop baghouse collection system drums (Photo 15) that were located east approximately 30 feet from the stormwater ditch that leads to the Cedar Rapids Municipal Separate Stormwater Sewer System (MS4) (photo 16).

Then we inspected the 3.9-acre storage area on the south side of 27th Ave. SW (photo 17) where we looked at the only stormwater outfall (photo 18). In addition, the next day we took photo 19 of the outlet of the stormwater outfall.

After the site walkthrough, we held an exit meeting with Kevin Dixon. We discussed the preliminary observations, and I informed him that we will issue a Notice of Preliminary Findings (NOPF) and return the next day to conduct a formal exit meeting. We all agreed to meet the next day at 9:00AM.

Soon after our site inspection on February 7, 2024, I received an email from Kevin Dixon that included the SWPPP (Attachment 3), the 2021-2023 annual inspection reports (Attachment 4); Section 313 Industrials Facilities Survey (Attachment 5); the 2021-2023 annual monitoring reports (Attachment 6), and a copy of the 2023 facility Stormwater Training (Attachment 10).

Also on February 7, 2024, I received a second email (Attachment 9) from Kevin Dixon that included photos of corrective actions taken by facility personnel in response to our site observation number 1.

On February 8, 2024, at 9:00AM, Connor Finn and I returned to the site and held a formal exit meeting with Kevin Dixon. We issued and discussed the three observations we included on the NOPF (Attachment 8). After our discussion, I deleted one of the observations.

Facility Description

Iowa Specialties, Inc. (facility) is a family-owned company that has been in business for 50 years.

According to the Linn County, Iowa website, the facility sits on a 6.33-acre parcel on the north side of 27th Ave SW, and on three-parcels with a total area of 3.9 acres. The facility sits on a higher elevation than the neighboring properties to the north, east, and south. The facility is surrounded by light industries.

Site operation consists of receiving, cleaning, fabricating, blasting, and painting of structural steel. Hours of operations at the facility are one eight-hour shift Monday through Friday between 6:00AM to 6:00PM. Currently there are 17 people employed, 3 of which are office personnel.

On average, the facility process between 2,000 to 2,500 tons of fabricated metal annually. Iowa Specialties is authorized by the Iowa Department of Natural Resources (IDNR) to discharge stormwater associated with industrial activity under the National Pollutant Discharge Elimination System (NPDES) General Permit No 1 (GP #1).

The IDNR originally granted authorization to discharge on October 1, 1992, under permit number 0208-0135. The current GP #1 coverage is provided through September 30, 2026 (Attachment 2).

Figure 1, Iowa Specialties, Inc.

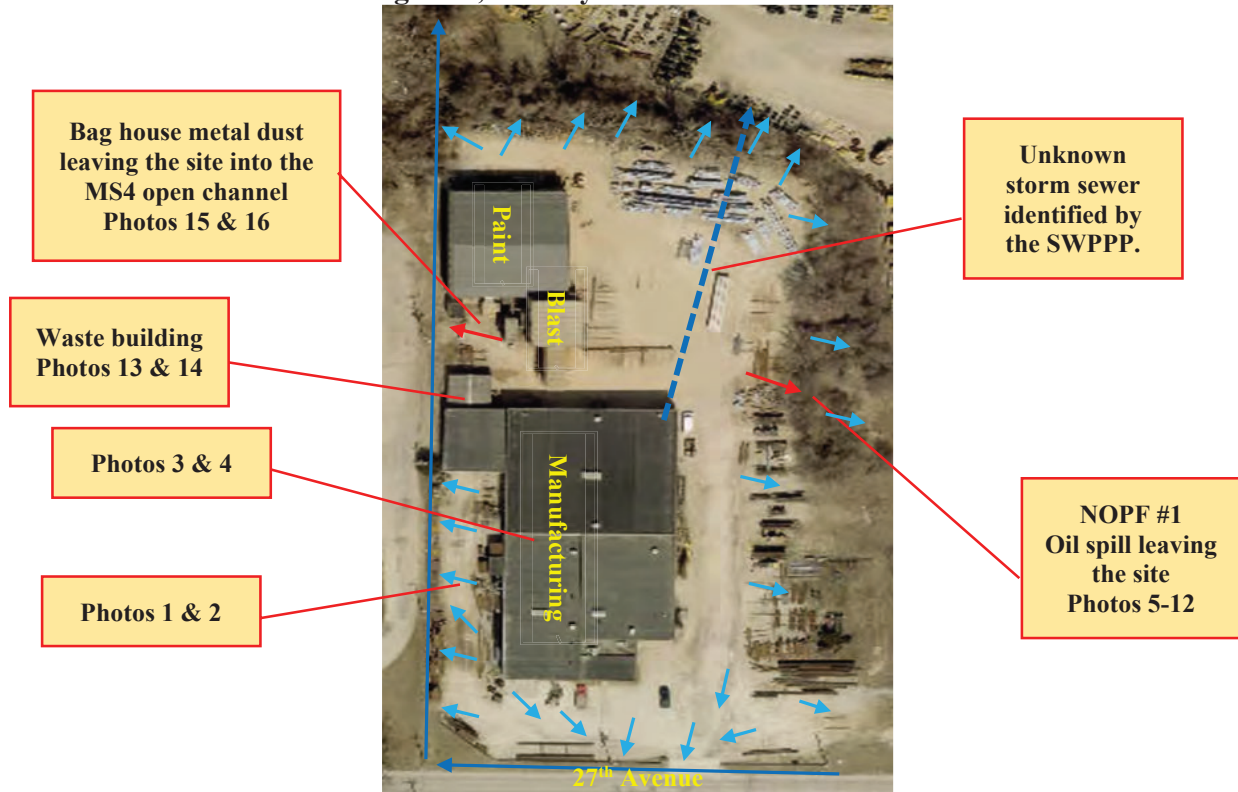


Site Drainage Patterns

Site topography is flat and sits on a 40 foot higher elevation than the north, east, and south neighboring properties. There are two drainage areas:

North Drainage Area: Stormwater runoff from the storage yard located on the north side of 27th Ave. SW. would flow to all directions. Surface runoff would flow to the north and east onto the steep cliff into the neighboring properties, south into the 27th Avenue ditch, and west into the Cedar Rapids MS4 open ditch. Stormwater in the 27th avenue ditch would flow west into the open channel. The flow in the open channel would flow north for at least 1400 feet into the unnamed tributary to Prairie Creek. The tributary would flow south approximately one mile into Prairie Creek. Prairie Creek flows northeast approximately 1.5 miles into Cedar River.

Figure 2, North yard area Surface runoff



South Drainage Area: Stormwater runoff from the storage yard located on the south side of 27th Ave. is directed to flow toward a stormwater inlet located in the yard. The inlet is piped south on the 50-foot steep cliff into the Cedar Rapids MS4.

Figure 3 , South yard area Surface runoff



Findings and Observations

All findings and observations of this inspection concern Iowa Specialties' status of compliance with the requirements of the Iowa NPDES GP #1 and the SWPPP. These findings are based on our interview with facility personnel, my review of the SWPPP, and our visual observations of the site. All observations were discussed in detail with Kevin Dixon throughout the inspection on February 7, 2024, and during the formal exit meeting on February 8, 2024. All photos taken during the inspection on February 7, 2024 (photo #19 was taken on February 8, 2024), are included as Attachment 7 to this report.

1. Upon my return to office and further review of the SWPPP, the SWPPP (Attachment 3) appeared adequate and conforms to current site activities. However, I noticed the following:
 - a. The SWPPP was not signed and did include the certification statement.
 - b. The SWPPP did not identify the bag house collection system area west of the blast building as a discharge point to the Cedar Rapids MS4 open channel.
2. Site inspections are conducted in April and October each year by Kevin Dixon. The two-page inspections reports (Attachment 4) appeared adequate by identifying site observation and corrective actions. The last inspection was conducted on October 10, 2023.
3. During our inspection of the north storage yard, we noticed an area of significant ground discoloration. The discoloration was an oil spill (photos 5-12). We pointed out our observation to Kevin Dixon, and he confirmed our observation. Kevin Dixon added that he doesn't know how or when this spill occurred, especially since no industrial activities take place outdoors. Therefore, we issued Notice of Preliminary Findings number 1 (NOPF #1) for evidence of oily substance discharged from the site into the neighboring property as shown in photo 5 below.

Photo 5, Oil spill leaving the site onto the cliff



4. Section B.7 of the SWPPP discuss sediment and erosion of the south yard area. The SWPPP should also include the north yard area to prevent future spills from flowing directly down the cliff and drain discharge at the base of the cliff into neighboring property.
5. I issued NOPF #2 because records indicated that the only employee' stormwater training was conducted on January 2, 2023. Kevin Dixon indicated that his employees receive informal training annually.

As mentioned above, the facility employs fourteen non-administrative people. The training log, however, indicated that only eleven employees received the training on January 2, 2023. On February 7, 2024, soon after our inspection, three more employees received the training (Attachment 10).

6. During our walkthrough inside the manufacturing building, we noticed the floor drainage system. Kevin Dixon was not aware where the system drains to. While reviewing the site map, I noticed that the map identified an underground stormwater pipe that runs from the northeast corner of the blast building to the north side of the site. We were unable to track the end of the pipe.
7. As mentioned above in 1.b., the facility did not identify the area surrounding the baghouse collection system located west of the blast building as a source of potential pollutants nor as a discharge point on the site map. The collection system area cliffs west, approximately 30 feet, toward the MS4 open ditch. We pointed out to Kevin Dixon the significant ground discoloration caused by fugitive dust from the collection system (photos 15 and 16 below).

Photo 15, Ground discoloration from the collection system



Photo 16, MS4 open ditch 30 feet from the collection system



8. Since the facility is subject to Title III, Section 313 of the Superfund Amendments and Reauthorization Act (SARA) for chemicals which are classified as Section 313 water priority chemicals; the facility included narrative in the SWPPP under section F that none of the SARA 313 chemicals are exposed to stormwater. The City of Cedar Rapids MS4 program, however, required the facility to conduct a SARA Section 313 Industrial Facilities Survey as part of the Cedar Rapids MS4 Stormwater Pollution Prevention and Management Program and monitoring of industrial and high-risk runoff. The facility completed the survey on November 4, 2022 (Attachment 5). The facility reported the use of 702 pounds of lead that were exposed to stormwater.
9. In addition, Part V.B.1 of the NPDES permit and the MS4 program requires the facility to annually monitor oil and grease; five-day biochemical oxygen demand (BOD5); chemical oxygen demand (COD); total suspended solids (TSS); total Kjeldahl nitrogen (TKN); total phosphorus; pH; and any SARA Section 313 water priority chemical for which the facility is subject to reporting requirements under SARA Section 313. Records indicate that the facility included this requirement under Section A.5 of the SWPPP and conducted sampling annually (Attachment 6).
10. Part III.C.4.(B).(10) and Part V.A. of the NPDES permit requires the facility to certify that there are no non-storm water discharges from the site. Kevin Dixon signed the certification statement on December 16, 2015, under Section B.10 of the SWPPP.
11. According to the SWPPP, there are no structural controls on site. However, the only control we observed was on the south yard where the topography of the site is designed to allow

surface runoff to run into the stormwater inlet (photo 18). The outlet of the inlet also has, according to Kevin Dixon, rocks to capture and filter sediment from entering the MS4. On site nonstructural control are basically implementing the SWPPP.

12. During our inspection, it appeared that the facility did not have aboveground storage capacity of 1,320 gallons of aggregate petroleum products stored on site. Therefore, at the time of this inspection, Iowa Specialties was not required to develop and implement a Spill Control and Countermeasure Plan (SPCC) in accordance with §112.7 and all other applicable sections of 40 CFR Part 112, §112.3. We explained to Kevin Dixon that § 112.3 requires the owner or operator of an onshore or offshore facility subject to this section must prepare in writing and implement a SPCC Plan. The plan must describe the physical layout of the facility and includes a facility diagram, which must mark the location and contents of each fixed oil storage container and the storage area where mobile or portable containers are located. The facility diagram must identify the location of and mark as “exempt” underground tanks that are otherwise exempted from the requirements of this part under § 112.1(d)(4). The regulation also requires employee training, inspections, tests, and records.

Conclusions

1. Overall, the site was organized, and the north and south yards were free of trash and floatables.
2. On February 7, 2024, soon after our inspection, we received an email from Kevin Dixon that included photos of corrective action taken as a response to our observations (Attachment 9).
3. Kevin Dixon should include a signed certification statement in the SWPPP and include the Blast baghouse area as discharge point. Iowa Specialties should review the current SWPPP and updated as needed.
4. Iowa Specialties should investigate the direction of the floor drains inside the manufacturing building and update the SWPPP map accordingly.
5. Section B.7 of the SWPPP discusses sediment and erosion of the south yard area. The SWPPP should also include the north yard area to prevent future spills from flowing directly down the cliff and discharging at the base of the cliff into neighboring property.
6. Iowa Specialties should ensure all employees receive formal annual stormwater training as required by PART III.C.4.B(8) of the NPDES permit and Section B.8 of the SWPPP.

NAJI AHMAD Digitally signed by NAJI AHMAD
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Naji J. Ahmad
Environmental Engineer,
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JODI BRUNO Digitally signed by JODI BRUNO
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Jodi Bruno
WB Manager

Attachments

1. ISW Checklist
2. NPDES GP1
3. SWPPP
4. 2021-2023 site inspections
5. SARA 313 Survey
6. 2021-2023 Monitoring Results
7. Photo log
8. NOPF
9. Response to the NOPF
10. Employee training