



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 2
CARIBBEAN ENVIRONMENTAL PROTECTION DIVISION
MULTIMEDIA PERMITS AND COMPLIANCE BRANCH

NPDES STORMWATER RECONNAISSANCE INSPECTION REPORT

OWNER/OPERATOR

Concrete VI

6252 Peters Rest Christiansted, Virgin Islands 00820

Tel.: (340) 249-0001

Email: info@concrete

Latitude: 17°42'2.70"N Longitude: 64°46'10.35"W

INSPECTION AUTHORITY

Section 308(a) of the Clean Water Act, 33 U.S.C § 1318(a)

NPDES ID Number: VIU008745

Inspection Date: June 30, 2022

Participating Personnel:

U.S. EPA:

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Senior Physical Scientist
Clean Water Act Team

Concrete VI.

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Inspection Report Prepared by:

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8-29-2022

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Date

**Inspection Report
Approving Officer:**

JIM CASEY

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Date

1. INTRODUCTION

On June 30, 2022, Mr. Jaime López (the “EPA Inspector”), Senior Physical Scientist of the United States Environmental Protection Agency (“EPA”) and Mr. Courtney Dickenson, Environmental Engineer of the V.I. Department of Planning and Natural Resources (“VIDPNR” or the “Department”) conducted a Federal-lead National Pollutant Discharge Elimination System (“NPDES”) Stormwater Reconnaissance Inspection (the “Inspection”) at the Concrete VI (“CVI”), facility located at 6252 Peters Rest Christiansted, Virgin Islands (the “Facility”). The Inspection was performed pursuant to the inspection authority under Section 308(a) of the Federal Water Pollution Control Act (“CWA” or the “Act”), as amended. The purpose of the Inspection was to determine whether CVI was operating its Facility in compliance with the Virgin Islands Territorial Pollutant Discharge Elimination System (“TPDES”) Multi-Sector General Permit for Stormwater Discharges from Industrial Activity¹, the CWA, and its implementing regulations. The EPA Inspector assumed the lead agency responsibility during the Inspection.

This Inspection Report (the “Report”) summarizes the discussions held with Facility’s representative and describes the EPA Inspector’s observations during the walkthrough of the Facility.

This Report entails observations and findings, and areas of concern regarding the conditions that existed at the Facility at the time of the Inspection. Also included in this Report are the EPA Inspector’s evaluation of the functional instituted practices related to Best Management Practices (“BMPs”) by CVI for prevention and control of discharges of pollutants through storm water flows associated with industrial activity from the Facility.

2. DESCRIPTION OF THE FACILITY

CVI offices are located at 6252 Peters Rest Christiansted, St. Croix, United States Virgin Islands 00820. The main industrial activity at the Facility involves manufacturing Portland cement and delivered to a purchaser in a plastic and unhardened state. This industry includes production and sale of central-mixed concrete, shrink-mixed concrete, and truck-mixed concrete. This activity is best described by the Standard Industrial Classification (“SIC”) Code 3273.

During the Inspection, the EPA Inspector learned that the Facility owns and operate volumetric concrete mixer trucks which contain separate compartments for sand, stone, cement and water that produces concrete by proportioning the materials out over time by volume and relating that volume back to the materials specific weigh (also known as a volumetric mobile mixer) that contains concrete ingredient materials and water to be

¹ This permit refers to the Virgin Islands TPDES Multi-Sector General Permit for Stormwater Discharges from Industrial Activity (“MSGP”) issued by the Virgin Islands Department of Planning and Natural Resources (“VIDPNR” or “Department”), which became effective on January 1, 2012. VIDPNR re-issued the MSGP on March 1, 2017. The MSGP expired on February 28, 2022 and has been administratively extended since.

mixed at the job site to produce the exact amount of concrete needed. The aggregates material, cement, and water are obtained and loaded from the operational addresses of local vendors into the separate compartments of the truck and delivered to clients around the island. There is not a specific manufacturing or operations site just administrative offices and a sand storage lot located at 13 S and 13 Y Vicorp Land, Bethlehem, Christiansted, St. Croix USVI. This type of industrial operation is not eligible according the MSGP requirement in Appendix D. **Image 1** depicts a view of the sand storage lot.

Image 1²



3. APPLICABLE REGULATIONS AND PERMITS

Discharges of Storm Water Associated with Industrial Activity into Waters of the United States

² The EPA Inspector used his privately-owned phone camera (T-Mobile RVVLY Motorola G7) to take photographs and document his observations. The photograph taken by the EPA Inspector was unaltered and transferred to an EPA computer system database (F:\INSNPDES\INSNPDES.22\Concrete VI. inspection file).

Section 402(p)(2)(B) of the CWA authorizes the Administrator of EPA to issue NPDES permits to storm water discharges associated with industrial activity. EPA promulgated NPDES regulations defining the term storm water associated with industrial activity. Those regulations are codified in 40 C.F.R. § 122.26(b). The industrial activity classified under SIC Code 3273 (Ready-Mixed Concrete) is included in the definition of storm water discharges associated with industrial activity. See 40 C.F.R. § 122.26(b)(14)(ii).

On June 20, 2007, VIDPNR promulgated regulations pursuant to USVI Statute at 12 V.I.C. Chapter 7, Subchapter 184-45, which require owners/operators of facilities with storm water discharges associated with industrial activities to apply for and obtain coverage under a TPDES permit.

4. PRE-INSPECTION ACTIVITIES

On Wednesday June 29, 2022, the EPA Inspector conducted a review of documents in the case file for the Facility maintained at the Agency's Office, and searched EPA's Integrated Compliance Information System ("ICIS") and the Enforcement and Compliance History Online ("ECHO") databases to determine its TPDES permitting status, and the recent compliance history. The pre-inspection review of records revealed the following:

- a. does not show that VIPI was issued coverage for the Facility under the 2017 MSGP nor a TPDES individual permit.
- b. VIDPNR has not re-issued the Virgin Islands MSGP, which became effective on March 1, 2017, and expired on February 28, 2022. The permit has been administratively extended.

5. ARRIVAL AT THE FACILITY

At approximately 3:00 p.m. on June 30, 2022, the EPA Inspector arrived at an area, in the Facility offices. Thereafter, Mr. López met with Mrs. Munchez, who presented himself as the Owner of CVI, the company that owns and operates the volumetric concrete mixer trucks. Mr. López showed his EPA-issued credentials to Mrs. Munchez.

6. ENTRY MEETING

Approximately between 3:10 p.m. and 3:35 p.m., the EPA Inspector met with Mrs. Munchez and discussed the purpose of the Inspection, the areas of the Facility that the EPA Inspector will be conducting a walkthrough. The EPA Inspector then requested the Facility records, including: the Storm Water Pollution Prevention Plan, Employee Training, Corrective Actions and Inspection Reports to be reviewed offsite.

Mrs. Munchez indicated that they do not own a ready-mixed manufacturing plant and associated support provisions where they have an operation. They only buy concrete mixture materials (i.e., sand crushed stone, concrete, and water) and load them into the

truck compartments and deliver the service to their clients' sites. The EPA Inspector also inquired about location CVI may have stored stocks of the materials and she indicated that they only store sand at a lot they rented in the location referenced above.

7. WALKTHROUGH OF THE ASPHALT PLANT

Upon the conclusion of the Entry Meeting, Mr. Dickenson accompanied the EPA Inspector to the CVI location of the stored sand to assess the site. The conditions during the walkthrough of the sand storage lot were dry weather and sunny skies.

The following were included among the EPA Inspector's observations:

- a. A lot where there were no physical building or other structures, but only deposited sand stockpiles.
- b. No industrial activities were observed at the time of the inspection.
- c. No stormwater discharges associated with industrial activities were identified and could impact waters of the US were observed.

8. EXIT MEETING

After the completion of Facility walkthrough, the EPA left the sand lot premises and continued to the airport. No exit meeting took place. the EPA Inspector left the Facility on or about 4:30 p.m.

End of Report

Attachment 1: Photo - Documentation