



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III**

**Four Penn Center – 1600 JFK Blvd
Philadelphia, Pennsylvania 19103-2029**

Report Title: Clean Water Act Compliance Inspection Report
Inspection Date(s): 06/06/2023
Regulatory Program(s): National Pollutant Discharge Elimination System (NPDES)
Type of Activity: Industrial Stormwater
Facility Name: Smith Concrete Company - Culloden
Permittee(s): Smith Concrete Co.
Facility Address: 1960 US RT 60, Culloden, WV 25510
Latitude: 38.419789 **Longitude:** -82.071561
Permit Number: WVG610500
NAICS Code: 327390 **SIC:** 3272
Receiving Waters: Unnamed Tributary to Indian Fork
Unique Project #: 3E23WN098A

Facility Representative(s):

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**Point of
Contact**
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- Appendix A - Facility Map
- Appendix B - WVDEP Modified 2020 Multi-Sector General Permit
- Appendix C - Photograph Log
- Appendix D - Stormwater Pollution Prevention Plan (SWPPP)
- Appendix E - Groundwater Protection Plan (GPP)

I. Introduction

On June 06, 2023, inspectors from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, the “EPA Inspection Team”) conducted a Stormwater Inspection (the “Inspection”) of Smith Concrete Company’s Culloden Plant (hereinafter, “the Facility”). A representative from West Virginia Department of Environmental Protection (“WVDEP”) also attended the Inspection. The purpose of the Inspection was to observe compliance with the Clean Water Act (“CWA”) and to verify compliance with WVDEP’s National Pollutant Discharge Elimination System (“NPDES”) Multi-Sector General Water Pollution Control Permit (hereinafter the “Permit”; refer to Appendix B). The Facility is regulated under Permit No. WVG610500.

A. Inspection Opening Conference

The EPA Inspection Team arrived at the Facility at approximately 9:00 AM (EDT) for the Inspection. Monica Crosby displayed her credentials to the Facility representative, Mr. James Davis, at the outset of the Inspection and explained the purpose of the Inspection was to review compliance with the Permit. The EPA Inspection Team informed Mr. Davis that any information that the Facility deemed to be confidential business information (CBI) should be identified to the EPA Inspection during the Inspection and it would be handled as CBI according to EPA’s CBI procedures. Table 1 describes the individuals that participated in the Inspection.

Table 1. Inspection Attendee List

Name	Affiliation	Contact Information
U.S. EPA Region III		
Monica Crosby	EPA Region III - Inspector	Phone: (410) 305-2930 Email: crosby.monica@epa.gov
Peter Gold	EPA Region III - Inspector	Phone: (215) 814-5236 Email: gold.peter@epa.gov
West Virginia Department of Environmental Protection (WVDEP)		
Ryan Harbison	Inspector - WVDEP	Phone: (304) 926-0470 Ext. 49771 Email: ryan.t.harbinson@wv.gov
Facility Representative		
James Davis	Lab Technician – Smith Concrete Co.	Phone: (304) 410-7609 Email: smithpoca@aol.com

B. Weather and Precipitation Conditions

During the Inspection, weather was mostly sunny and approximately 75°F. National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the Inspection and 5 days prior are provided in the Table 2 below:

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches) ¹
CULLODEN 0.5 WSW, WV US1WVCB0019	6/01/2023	0.00
CULLODEN 0.5 WSW, WV US1WVCB0019	6/02/2023	0.00
CULLODEN 0.5 WSW, WV US1WVCB0019	6/03/2023	0.00
CULLODEN 0.5 WSW, WV US1WVCB0019	6/04/2023	0.00
CULLODEN 0.5 WSW, WV US1WVCB0019	6/05/2023	0.00
CULLODEN 0.5 WSW, WV US1WVCB0019	6/06/2023	0.00

¹ Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

C. Summary of the Facility

Smith Concrete is a manufacturer of ready-mix concrete or other concrete products. The Facility receives deliveries of raw materials including, sand, gravel, and limestone, which are all stored in outdoor storage bins or designated storage areas within the plant yard. The raw materials are then transferred to the concrete plant on an as-needed basis using an end-loader and automated conveyer system. Other materials, such as fly ash, cement, and admixtures are normally stored in covered areas. Once needed, these materials are delivered to the trucks where they are then mixed with a water-admixture solution to form concrete. The concrete is then transported to the job site for placement. Smith Concrete has two additional facilities located in Charleston, WV and Poca, WV.

The Facility has two (2) outlets that are located immediately downslope of the plant and can be seen in the Facility map provided in Appendix A. Stormwater from the Facility discharges to an unnamed tributary of Indian Fork, a tributary to Mud River and ultimately the Kanawha River.

II. Facility Activity

As part of the Inspection, the EPA Inspection Team visually observed Facility conditions, operations, activities, and industrial equipment in the presence of the Facility representative and certified operator. Areas viewed during the Facility site walk include:

- Truck unloading area
- Concrete plant
- Truck loading area
- Truck washout areas (2)
- Fuel storage
- One (1) sedimentation basin
- Outlet 001 and Outlet 002

The Facility encompasses approximately 2.3 acres and contains a truck unloading area with raw material storage piles, a building that houses the admix room, storage, and office space, a trailer with an in-house lab, a concrete mixing plant, a truck loading area, and a wash area. At the time

of the Inspection, about half of the total property boundary was being leased to a third-party company, AimPoint Consulting, LLC.

The Standard Industrial Classification (“SIC”) codes associated with the Facility is **3272** (Concrete and Gypsum Product Manufacturers Monitoring Requirements) and is considered to be “industrial activity” per to 40 CFR 122.26(14). This SIC code is regulated by West Virginia’s Regulations Governing Storm Water Discharges Associated with Industrial Activities (West Virginia Administrative Code Agency 47). As such, the Facility is regulated by Subsection 47-10 and requires coverage under a West Virginia NPDES Water Pollution Control Permit, a permit by Regulations. The Facility is covered by West Virginia’s Multi-Sector General Permit (“MSGP”) under the registration number WVG610500 (“Permit”). The Permit is provided in Appendix B.

Photographs were taken during the Inspection by **Peter Gold** and are provided in Appendix C. The Facility has two (2) outlets that discharge into an Unnamed Tributary to the Indian Fork, a tributary to the Kanawha River that flows into the Ohio River. Outlet 002 was first included in the Facility’s renewal application for coverage under the 2015 MSGP, with a submission and certification date of July 23, 2014. It was explained by the Facility Representative that Outlet 002 is more a collection of water than it is an actual discharge point. Prior to Outlet 001, the Facility has a sedimentation basin constructed to collect water and thus help provide the runoff with the retention time required for settling. The flow then goes through a pipe and out of Outlet 001 (refer to Appendix C, IMG 1458 and 1459). At the time of the Inspection there was no active flow coming from these outlets.

At the time of the Inspection, Facility Representatives from Smith Concrete described operations to the EPA Inspection Team, including the individual industrial activities, ownership details, and operator responsibilities. For the past few years, most of the company’s operations have been carried out at the Poca Plant. The Culloden Plant has not been operated since WVDEP’s March 3, 2022, inspection. At the time of the Inspection, the Facility was leasing a portion of their property to AimPoint Consulting, LLC (refer to Appendix C, IMG 1435). The Facility’s mixing trucks and crushers are housed at the Poca Plant.

The Facility has one entrance and exit (refer to Appendix C, IMG 1431). The raw materials (are brought in via a dumping truck and dropped into designated concrete storage areas within the plant yard (refer to Appendix C, IMG 1480, 1485, 1490, and 1492). According to the Facility Representative, raw materials include sand, river rock, limestone, mixed limestone, pea gravel, and state approved limestone. Each returning truck is allowed to dispose of excess concrete and truck washout water (refer to Appendix C, IMG 1479 & 1484). Once excess concrete is dumped, each truck is washed by the truck wash basin (refer to Appendix C, IMG 1473). Facility representatives explained that the outside of the trucks is washed with hydrochloric acid. Water that collects in the wash basin is pumped out and recycled through to continue washing (refer to Appendix C, IMG 1470 – 1472). At the time of the Inspection, the Facility Representative explained that the previous dumping spot was located south, towards the fence line, but this area was moved to the north end of the property after WVDEP discovered Outlet 002 (refer to Appendix C, IMG 1440 and 1441).

Under normal operations, raw material that is placed in the concrete barriers is then taken to the aggregate loading area where it is carried via conveyer belt into the mixing tank (refer to

Appendix C, IMG 1480 and 1489). The mixing trucks are then loaded with water and cement aggregate water where it is then mixed in the truck to form concrete (refer to Appendix C, IMG 1494). Prior to leaving the site, each driver is responsible for washing down their truck at a separate, smaller wash basin to ensure that any aggregate-water on the outside of the truck, as well as any aggregate dust that may have collected, doesn't leave the site (refer to Appendix C, IMG 1433, 1434, and 1439). The concrete is then transported to the job site for placement. When asked where any water that collects in the exit wash basin goes, the Facility Representative stated that there were no drains or pipes; all collected water leaves through evaporation. On an as-needed basis, the Facility will scoop out sediment from these washout stations. All waste is collected in a dumpster onsite and picked up every Tuesday and Wednesday, so long as the Facility gate is open (refer to Appendix C, IMG 1454).

The observations from the Inspection are described in detail below in the Observations section.

III. Observations

Observation #1

Discharge Limitations and Monitoring Requirements:

Requirement:

Permit Section A, Table E.2 outlines the benchmark monitoring requirements of stormwater runoff for concrete products (SIC code 3472).

Pollutants of Concern	Benchmark Monitoring Concentration	Measurement Frequency
Total Suspended Solids	100 mg/l	Quarterly
Total Recoverable Iron	1.5 mg/l	Quarterly
pH	6.0 to 9.0 s.u.	Quarterly

Permit Section B. 6.a.1 requires that, “Upon reviewing a laboratory report showing a first-time exceedance of a benchmark concentration, the permittee must immediately take all reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational.” It further requires a review of the SWPPP to “determine if modifications are necessary; when in fact, a corrective action is not necessary, [the permittee] must document why a corrective action is not necessary.”

Permit Section B. 6.a.4. states, “The SWPPP must be modified after the average of four consecutive samples are above the benchmark level for the sampled parameter. Based upon the modification of the SWPPP, the selection, design, installation, and implementation of any control measures at the facility may also be required to be modified to ensure that all sampled parameters meet the required benchmark levels.

Modification is also triggered if less than four benchmark samples have been taken, but the results are such that an exceedance of the four-quarter average is mathematically certain (i.e., if the sum of quarterly sample results to date is more than four times the benchmark level)."

Observation #1:

Based on the Discharge Monitoring Reports ("DMRs") provided by the Facility from January 2018 to June 2023, the Facility did not provide any sample data for Outlet 002 during the June 2022, September 2022, December 2022, or March 2023 sample. The DMR provided for September 2022 indicated a benchmark exceedance from Outlet 001 in TSS with a DMR value of 476 mg/L. This value is more than four times the benchmark level and makes an exceedance of the four-quarter average mathematically certain. The SWPPP was last modified on 11/15/2019 and not after this September 2022 results.

Monitoring End Date	Outlet #	Parameter	DMR Value	Unit	Permit Limit	Unit
9/30/2022	001	TSS	476	mg/L	<= 100	mg/L

The majority of the reports are marked as no discharge or not in operation.

Observation #2

Visual Inspections

Requirement:

Part B. 10 of the Permit requires the permittee to perform and document a visual examination of the stormwater discharge associated with each industrial activity for each outlet quarterly. The examination should document observations of color, odor, clarity, floating solids, settling solids, suspended solids, foam, oil, sheen, and other obvious indicators of stormwater pollution. All visual examinations must be maintained onsite in the SWPPP.

Part B.17(A)(2)(10) requires the permittee to conduct visual inspections on a quarterly basis. Material handling areas shall be inspected for evidence of, or the potential for, pollutants entering the drainage system. A tracking and follow-up program shall be developed to ensure that adequate response and corrective actions have been taken in response to observations/findings during the inspection. Records of inspections and any corrective actions taken shall be maintained in the SWPPP.

SWPPP Section 4 Schedules and Procedures for Monitoring "1. Sample Location. Outfall 001 and 002."

SWPPP Section 5 identifies a monthly inspection by the Plant manager.

Observation #2:

EPA observed the Plant Manager's monthly inspection logbook that includes precipitation, flow, color, odor, foam, oil, sheen, clarity, solids, and any actions taken. The EPA Inspection Team observed that all monthly inspection logs were documented as being for Outlet 001. There were no inspection logs for Outlet 002 (refer to Appendix C, IMG 1499, 1501, and 1505). When this was raised to the Facility Representative during the Inspection, it was stated this was because Outlet 002 is not a true outfall, but rather a collection of water (refer to Appendix C, IMG 1444 – 1446). The Facility put up a concrete wall after WVDEP noticed some erosion near Outlet 002 and since that wall was constructed, the Facility noticed a spur of vegetation (refer to Appendix C, IMG 1443).

Observations #3 - #7

Stormwater Pollution Prevention Plan

Requirement:

Section B.17 of the Permit requires that each facility covered under the Permit to develop and implement a SWPPP as a stand-alone document maintained onsite.

Section B.17(A) outlines the minimum requirements to be included in the Facility's SWPPP. 1.a.1 of that section requires a site map indicating: "each drainage and discharge structure, an outline of the drainage area of each discharge point, each past or present area used for outdoor storage or disposal of significant materials; each existing structural control measure to reduce pollutants in stormwater runoff; materials loading and access area; each hazardous waste storage or disposal..."

Section B.17(A)(2)(3) that section requires the SWPPP to include a preventive maintenance program that involves the inspection and maintenance of stormwater pollution devices (e.g., cleaning oil/water separator, catch basins, etc.) as well as inspecting and testing plant equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters.

SWPPP Section 4.3 Monitoring Schedules "Once every six months"

Observations:

The Facility provided both onsite, and electronically afterwards, their most recently revised SWPPP, dated 11/15/2019 (refer to Appendix C, IMG 1507). A copy of the SWPPP is provided in Appendix D. The EPA Inspection Team made the following observations:

Observation #3:

Pursuant to Section B.17(A) of the permit, the SWPPP includes a site map that indicates drainage. The EPA Inspection Team was not able to find on the map each past or present area used for outdoor storage or disposal of significant materials; each existing structural control measure to reduce pollutants in stormwater runoff; materials loading and access area; or the storage site of hazardous waste. At the time of the inspection, the EPA Inspection team observed an unmarked pipe with its discharge point to the Unnamed Tributary. At the time of the Inspection, the pipe was capped, and the Facility Representative was unsure of its origin

(refer to Appendix C, IMG 1477).

Observation #4:

The SWPPP calls for sampling from Outfalls 001 and 002 to occur every six months. The permit requires quarterly benchmark monitoring samples and quarterly visual examinations samples.

Observation #5:

Section 2 of the SWPPP outlines potential pollution sources. During the Inspection, the EPA observed gas cannisters housed outdoors and without secondary containment. the EPA Inspection Team was unable to find these items in the SWPPP. These cannisters were in an area currently being leased by a third-party (refer to Appendix C, IMG 1464).

Observation #6:

Additionally, the SWPPP mentions maintenance of vehicles, but the EPA Inspection Team was unable to find a description of what this would entail housed in the SWPPP. The EPA Inspection Team was unable to find an inspection and maintenance program for stormwater pollution devices in the SWPPP, specifically that of the sedimentation basin that was constructed prior to Outlet 001 or the mixing truck wash station.

Observation #7:

Section 3.2 of the SWPPP mentions a biweekly self-inspection frequency, while Section 5 of the SWPPP mentions a monthly self-inspection frequency. The EPA Inspection Team was unable to find differences between these inspections or descriptions of the biweekly inspection in the SWPPP.

Observation #8
Groundwater Protection Plan

Requirement:

Permit Part B.17 requires the facility to develop and implement a Groundwater Protection Plan (GPP). Part C of that section outlines the requirements of the GPP including: an inventory of all operations which may reasonably be expected to contaminate groundwater resources with an indication of the potential for soil and groundwater contamination from those operations. In addition, the GPP shall provide a thorough and detailed description of procedures designed to protect groundwater from the identified potential contamination; a thorough and detailed list of groundwater protection procedures to be employed in the design of new equipment of operations; a thorough and detailed summary of all activities carried out under other regulatory programs which have relevance to groundwater protection; all reasonably available information on groundwater quality at the site; a statement that no wastes will be used for deicing, fills, or for other uses on the site unless provided for in existing rule; documentation that annual training all employees and contractor personnel on their responsibility to ensure groundwater protection was conducted; and instructions for

quarterly inspections of the facility to ensure that all elements and equipment of the groundwater protection programs are in place, functioning properly, and are appropriately managed. Documentation of all inspections conducted shall also be included in the GPP.

Observation #8:

The Facility provided the EPA Inspection Team with a copy of its GPP, both onsite and after the Inspection electronically, dated 11/15/2019 (refer to Appendix C, IMG 1506). The GPP was observed to have all required materials and is provided as Appendix E.

Observations #9 - #11
Preventative Maintenance

Requirement:

Permit Part B.17(A)(2)(3) requires the Permittee to develop a preventive maintenance program that involves inspection and maintenance of stormwater pollution prevention devices (e.g., cleaning oil/water separators, catch basins, etc.) as well as inspecting and testing plant equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters.

Observation #9:

As part of the Facility walk-through, the EPA Inspection Team observed the sedimentation basin that was constructed prior to Outlet 001. It was explained that flow enters the basin and makes its way through a tiered system, through a pipe, and out through Outlet 001. At the time of the Inspection, the EPA Inspection Team observed exposed soil in front of the sedimentation basin. It was explained that due to the lack of operation at this facility, there were weeds growing in this area that were recently removed. The sedimentation basin was observed to be murky and with a green discoloration. The weirs within the sedimentation basin were observed to have a slight buildup of sediment (refer to Appendix C, IMG 1456 and 1461).

Observation #10:

As part of the Facility walk-through, the EPA Inspection Team observed the truck washout basin that is used after mixing trumps dump of excess materials, but prior to filling their truck with new material. At the time of the Inspection, the Facility representative explained that hydrochloric acid is used to wash the outside of the trucks (refer to Appendix C, IMG 1470). It was further explained that the wash basin is set up as a three-tiered system that allows sediment and water to separate out, the sediment sinking to the bottom and the water moving through to the last tier. There is a pipe in the third tier that pumps collected water from the truck wash basin and recycles it through to continue washing trucks (refer to Appendix C, IMG 1471, 1472, and 1473). At the time of the Inspection, it appeared that the wash basin was compacted with sediment and the collected water to have a green

discoloration (refer to [Appendix C, IMG 1473](#)).

Observation #11:

The EPA Inspection Team observed the Facility's designated containment area that was used for trucks to dispose of excess sludge and admixture materials. It was explained that once the admixture settles and solidifies, a jackhammer is used to crush up old materials before taking them to a reclaimer located at the Poca Plant. The containment area had a downward slope, and it appeared there was no sidewall protection and a slight migration of materials (refer to [Appendix C, IMG 1478, 1479, and 1484](#)). Within this containment area, the EPA Inspection Team observed hardened concrete that had evidence of a stormwater flow path (refer to [Appendix C, IMG 1488](#)). Some materials appeared to be outside of the containment area boundaries (refer to [Appendix C, IMG 1475](#)). At the time of the inspection, the Facility's northern fence line that surrounds the back portion of this containment area was overgrown, and solidified concrete-materials were piled higher than the fence line (refer to [Appendix C, IMG 1486](#)). It was suspected by WVDEP that a drainage ditch exists parallel to the aggregate piles, but it was unconfirmed at the time of the Inspection. EPA Inspection Team did not observe any materials to have fallen over the fence line.

Observations #12 - #16

Good Housekeeping

Requirement:

Part B.17(A)(2)(4) of the Permit requires the Facility to maintain a clean, orderly facility.

SWPPP 3.2 states, "the plant management encourages good housekeeping by proper equipment maintenance and monthly inspections."

Permit Part II.1 requires the Permittee to, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit.

Observation #12:

At the time of the Inspection, there was an accumulation of used rags by the Office sign located adjacent to the smaller sedimentation basin that is used by drivers prior to leaving facility grounds. There was vegetation observed to be growing out of the rags, suggesting they had been there for an extended period (refer to [Appendix C, IMG 1436](#)).

Observation #13:

The Facility observed loose sediment in the flow path towards Outlet 002. At the time of the Inspection, it was explained that the third-party leasing this portion of the property previously hauled in dirt and placed it in this area. After becoming aware, Smith Concrete ordered the third-party to stop and remove the dirt (refer to [Appendix C, IMG 1442, 1445, &](#)

1446).

Observation #14:

The EPA Inspection Team observed an empty drum that was uncovered. It was unclear, and EPA did not infer, what the drum's intended purpose was (refer to Appendix C, IMG 1452 and 1453).

Observation #15:

During the Inspection, the EPA Inspection Team observed a bag of topsoil over the property boundary towards the UNT. Additional bags of this topsoil were observed adjacent to the sedimentation basin (refer to Appendix C, IMG 1465 and 1466).

Observation #16:

As part of the Facility walk-through, the EPA Inspection Team observed the concrete storage barriers used to house raw materials. The Facility Representative stated that raw materials include sand, river rock, limestone, a mixture of limestone and river rock, pea gravel, and state approved limestone (refer to Appendix C, IMG 1480). At the time of the inspection, these raw materials were uncovered and there was sediment track out (refer to Appendix C, IMG 1485, 1490, and 1492). The sand pile was observed to have slight discoloration (refer to Appendix C, IMG 1485).

Observations #17 and #18

Spill Prevention

Requirement:

Permit Part B.17(A)(2)(5) requires that areas where potential spills can occur, and their accompanying drainage points shall be identified clearly in the SWPPP and that procedures for spill cleanup and necessary equipment to implement a cleanup be identified in the SWPPP and made available for personnel.

SWPPP 3.1 states, "The plan and materials necessary for immediate cleanup of spills or leaks to the storm water have been identified and discussed herein. Smith Concrete's spill control response kits consist of 55- gallon drum of dry-rite materials and a package of spill kit pads is in the lab. Spill materials are reordered as needed by the Plant Manager. The Plant Manager inspects materials on a quarterly basis for re-ordering purposes."

Observation #17:

The EPA Inspection Team observed the Facility to have a spill response kit housed in their office building.

Observation #18:

As part of the Facility walk-through, the EPA Inspection Team observed the Facility's diesel fuel tank. A sign indicating the fuel tank ID, as well as the Facility phone number and Spill

Protection Hotline, was nailed to railing leading to the fuel tank . The fuel tank was contained within a concrete dike and covered by a metal roof (refer to Appendix C, IMG 1493). The Facility representative stated that the diesel is used to fuel equipment and mixing trucks. The Facility representative further explained that the containment area doesn't have a drain plug and that there have been no leaks in the history of the tanks being there.

Observation #19

Employee Training

Requirement:

Permit Part B.17(A)(2)(7) requires the permittee to instill training programs that inform personnel at all levels of responsibility of the components and goals of the SWPPP to be conducted annually. Training shall address topics such as spill response, good housekeeping, and material management practices. Records of the training program are to be maintained in the SWPPP.

Observation #19:

The EPA Inspection Team observed the Facility's log for their annual safety training. Facility representatives explained that this training is given to employees during the annual inspection. EPA communicated to the Facility Representative that third-party companies that operate on site, such as AimPoint Consulting, LLC should also be trained on the SWPPP and any spill procedures.

Observation #20

Outlet Markers

Requirement:

Appendix A.I.13 of the Permit states a permanent marker at the establishment shall be posted in accordance with Title 47, Series 11, Section 9 of the West Virginia Legislative Rules.

W. Va. Code R. § 47-11-9.2.b states, "The marker shall consist of the name of the establishment to which the permit was issued, the permit number, and the outlet number."

Observation #20:

At the time of the Inspection, the EPA Inspection Team observed each Outlet to have visible outlet signs. The sign for Outlet 002 contained all required information. The sign for Outlet 001 was observed to be without the facility name and with the permit number partially missing. (Appendix C, IMG 1560).

IV. Records Review

The EPA Inspection Team conducted a records review to evaluate the Facility's compliance with the Permit. The Facility's electronic Discharge Monitoring Reports (eDMRs), the

SWPPP, and GPP were obtained electronically and reviewed offsite after the onsite Inspection. The following were reviewed:

- Facility Permit
- Stormwater Pollution Prevention Plan (SWPPP)
- Groundwater Protection Plan (GPP)
- WVDEP March 2022 Inspection Report
- Electronic Discharge Monitoring Reports (eDMRs)
- Smith Concrete Acknowledgement of Safety Training Log

V. Closing Conference

At the conclusion of the Inspection, the EPA Inspection Team conducted a closing conference with the Facility Representatives and shared preliminary observations. The EPA Inspection Team reiterated to the site representatives that all preliminary observations discussed were not compliance determinations. The EPA Inspection team further explained that all preliminary observations discussed were subject to further investigation by EPA upon the review of additional records and documentation. Lastly, the EPA Inspection team stated that additional observations may be contained in the Inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the Inspection. The Inspection concluded at approximately 10 AM (EDT).