

UNPERMITTED INDUSTRIAL FACILITY STORMWATER INSPECTION CHECKLIST

Inspection Date	May 16, 2024	
Time	Entry: 9:30 AM	Entry: 10:20 AM
Weather Conditions	70°F's and Sunny	
Media/Program	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Primstone LLC	
Facility or Site Name:	Primstone Design Center	
Permit ID or Tracking #:	N/A. Unpermitted at the time of the inspection	
SIC Code:	SIC Code 3281 – Cut Stone and Stone Products.	
Facility Address:	9410 E Mt Houston Rd	
(city, state, zip code)	Montgomery, TX 77356	
Geographic Coordinates:	29.891200°, -95.249550°	
Mailing address:	9410 E Mt Houston Rd	
(city, state, zip code)	Montgomery, TX 77356	
County:	Harris County	
Regular Days/Hours of Operation:	8:00 AM – 4:00 PM (M – F); Closed (Sat – Sun)	
# of Employees at location:	20	
Size of Facility (in acres):	Approximately 3 acres total with approximately 2 acres of outdoor activity	
Receiving Water(s):	The nearest receiving water is the unnamed vegetated gravel swale located 150 feet southeast of the Facility	
Date facility est. @ location:	2004	
Onsite Representatives:		
Name: Freddie Hernandez	Title: Facility Manager	Phone: 281-827-9390
	Email: N/A; no email provided	
Authorized Official:	Contacted? ☐ Yes ☒ No	
Name: Charles Youssef	Title: Owner	Phone: 832-704-9598
	Email: charles.youssef@primstonellc.com	
Additional Personnel Participating in Inspection:		
Name: N/A	Title: N/A	
Inspector(s):	Title:	Company:
Christopher Pardo	Lead Inspector	Eastern Research Group, Inc.
Ryan Marrero-Vila	Inspector	Eastern Research Group, Inc.
Ivy Koberlein	Inspector	Environmental Protection Agency, Headquarters
Sharron Crayton	Inspector	Environmental Protection Agency, Region 6
Inspection Report Author:		
Name: Christopher Pardo	Signature: CPardo	Date: June 28, 2024
Supervisor Review:		
Name:	Signature: Carol Johnson	Date: 07/10/2024

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine compliance with the industrial stormwater requirements under §§ 301 and 402(p) of the Clean Water Act (CWA) and its implementing regulations found at 40 Code of Federal Regulations (CFR) Part 122.26. The inspection was unannounced and consisted of interviewing Facility representatives, recording field observations, and taking photographs to document site conditions throughout the Facility at the time of the inspection.

Opening Conference

- 1) Brief narrative documenting those present, introductions, presentation of credentials, and explanation of the purpose of the inspection.

On May 16, 2024, a U.S. Environmental Protection Agency (EPA) contractor, Eastern Research Group, Inc. (ERG), conducted an industrial stormwater non-filer inspection at Primstone LLC located in Montgomery, Texas (Facility). Ivy Koberlein of EPA Headquarters, Sharron Crayton of EPA Region 6, and Christopher Pardo and Ryan Marrero-Vila of ERG (collectively, EPA Inspection Team) met with the Facility representative, Freddie Hernandez. The EPA Inspection Team presented their credentials and explained that it was EPA's understanding that the facility did not have an industrial stormwater permit. The EPA Inspection Team explained they were onsite to conduct a Clean Water Act stormwater inspection, which includes observing the current operations of the facility and assessing the potential for stormwater discharges from the facility.

The weather at the time of the inspection was sunny and approximately 78°F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA), the Montgomery, Texas area received no rain the day of and the day prior to the inspection.

- 2) Credentials presented to: Freddie Hernandez
- 3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements?
☐ Yes ☒ No Describe: N/A
- 4) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements?
☐ Yes ☒ No Describe: N/A

FACILITY'S OPERATION & PRODUCT DESCRIPTION

Description of business and industrial activities occurring throughout the site. (Include operator's description and note any documentation that further establishes SIC code (permit applications, reports, business registries, website...)).

Primstone LLC is a marble and granite countertop manufacturer that molds, shapes, and cuts marble and granite slabs into sinks and countertops for commercial and residential clients. Countertop manufacturing occurs inside the two (2) large warehouses located in the western portion of the Facility [refer to Appendix B, Photograph Log (Photographs 11, 46 and 48)]. In addition to cutting operations, the Facility washes marble and granite using water drawn from an onsite well [refer to Appendix B, Photograph Log (Photograph 17)].

Stone molds, uncut marble/granite, and finished countertops were stored inside the warehouses and outside on paved and unpaved areas [refer to Appendix B, Photograph Log (Photographs 1, 3, 4, 7, 9, 11-14, 46 and 48)].

Other industrial facilities owned/operated by same business entity? ☐ Yes ☒ No Describe: N/A

SECTION II – OBSERVATIONS**SITE EVALUATION**

Pollutant Sources	Note location, quantity/size, design issues, any operation and maintenance (O&M) deficiencies (including the nature and extent), potential pollutants, and evidence of exposure to stormwater. Are Best Management Practices (BMPs) in place to minimize or eliminate stormwater discharges from industrial activities?
Loading/Unloading Operations	Loading and unloading operations occur on the paved concrete surface in the center of the Facility. The Facility unloads uncut granite and marble slabs from a semi-truck using one of the Facility's forklifts.
Industrial Manufacturing/Processing Operations	The EPA Inspection Team observed Facility workers cutting raw marble and granite using wet saws inside the southern warehouse [refer to <u>Appendix B, Photograph Log (Photograph 11)</u>]. Shaping and finishing of marble and granite slabs occurs within the northern warehouse.
Industrial Machinery & Equipment Storage	The EPA Inspection Team observed two (2) forklifts for moving materials around the Facility. One (1) forklift was parked in the yard among uncut marble/granite slabs in the southern portion of the Facility [refer to <u>Appendix B, Photograph Log (Photograph 12)</u>]. Industrial stone cutting and fabricating equipment were located inside the southern warehouse [refer to <u>Appendix B, Photograph Log (Photograph 11)</u>].
Storage of Industrial Materials or Products	The Facility stores uncut marble and granite slabs outside on a concrete pad and on grass in the center and southern portions of the Facility [refer to <u>Appendix B,</u>

SITE EVALUATION	
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	Photograph Log (Photographs 4, 7, 12-14, 46 and 48)]. All materials are stored uncovered. Stone molds were also stored uncovered outside on wooden racks over the concrete pad and on grass in the center portion of the Facility [refer to Appendix B, Photograph Log (Photographs 1, 3, 6, 8, 9, 46 and 48)]].
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The EPA Inspection observed one (1) large black tank located at the northwest corner of the Facility's stormwater retention pond [refer to Appendix B, Photograph Log (Photograph 45)]. According to the Facility representative, this tank was filled with water for fire suppression. The EPA Inspection Team observed one (1) tank, measuring approximately 80-gallons, at the southwestern corner of the Facility's stormwater retention pond. This tank, according to the Facility Representative, is a well pressure tank used for acquiring groundwater for marble and granite washing [refer to Appendix B, Photograph Log (Photograph 17)]].
Waste Storage/Disposal Areas (solid and/or hazardous)	The EPA Inspection Team observed one (1) uncovered solid waste roll-off dumpster stored on the paved surface in the center of the Facility [refer to Appendix B, Photograph Log (Photographs 5 and 44)] . The dumpster contained cardboard debris, plastic bags, and fragmented stone slabs.
Waste Treatment Facilities (e.g., Pretreatment Systems)	None observed or reported at the Facility.
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	None observed or reported at the Facility.
Sediment & Erosion Controls	Not applicable
Spills/Leaks Handling	None observed or reported at the facility.
Outside Shelters	☒ Temporary (Date Established _____ Unknown _____) ☐ Permanent One (1) canopy tent measuring approximately 20 feet by 12 feet was observed between the two (2) large warehouses in the western portion of the Facility. Stone molds were stored underneath the black canopy tent [refer to Appendix B, Photograph Log (Photograph 6, 8, and 43)]].
Evidence of non-	Evidence of allowable non-stormwater sources/discharges were not observed

SITE EVALUATION	
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stormwater sources/discharges (allowable if permitted under MSGP)?	during the inspection.
Evidence of process wastewater sources/discharges?	The EPA Inspection Team observed a process wastewater stream from the southern warehouse discharging offsite to the wooded area located to the southeast of the Facility via Discharge Point #2 [refer to <u>Appendix B, Photograph Log (Photographs 18-24 and 26-34)</u>]. The southern warehouse is used to cut marble and granite slabs. The process wastewater stream was turbid and white in color. The EPA Inspection Team observed white sediment accumulation on the vegetation along the flow path of the process wastewater stream. A second process wastewater outlet was observed at the southern warehouse [refer to <u>Appendix B, Photograph Log (Photographs 38 and 39)</u>]. Process wastewater from this outlet ponded adjacent to the warehouse and a thick layer of white sediment was observed immediately around the process wastewater outlet. The EPA Inspection Team observed a corroded/crumbling pipe exiting the southern warehouse with white sediment in and around the pipe [refer to <u>Appendix B, Photograph Log (Photographs 24, 26, and 40-42)</u>]. The EPA Inspection Team did not determine the intended function, or prior use, of this corroded/crumbling pipe.

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	The EPA Inspection Team observed Discharge Point #1 at the northernmost corner of the Facility's stormwater retention pond, which occupied the eastern portion of the site. According to the Facility representative, stormwater overflows the pond and discharges stormwater past the Facility fence line and into the wooded area located to the Facility's east side. [refer to <u>Appendix B, Photograph Log (Photograph 47)</u>]. The EPA Inspection Team observed ponded water within the wooded area which receives water from Discharge Point #1 [refer to <u>Appendix B, Photograph Log (Photographs 49-51)</u>]. The EPA Inspection Team additionally observed Discharge Point #2 within the wooded area located to the south of the Facility. One (1) observed process wastewater stream flowed from the southern warehouse for approximately 200 feet south into the wooded area [refer to <u>Appendix B, Photograph Log (Photographs 18-24 and 26-34)</u>]. Stormwater from the southwestern portion of

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
	the Facility would commingle with the process wastewater stream and flow southward and offsite into the wooded area.
Evidence of pollutants migrating offsite (stains, deposits, ponding) at discharge points, into receiving waters or in MS4	The EPA Inspection Team observed process wastewater flowing from the southern warehouse to the south and outside the Facility border through Discharge Point #2. The process wastewater flowed approximately 200 feet offsite before discharging into a swampy wooded area south of the Facility. The EPA Inspection Team observed white sediment accumulation along the flow path of this process wastewater stream and within the wooded area located to the south of the Facility [refer to <u>Appendix B, Photograph Log (Photographs 18-24 and 26-34)</u>].
Evidence of Non-stormwater Discharges leaving site (authorized or unauthorized)	The EPA Inspection Team observed evidence of an unauthorized process wastewater stream from the southern warehouse exiting the Facility through Discharge Point #2 and flowing approximately 200 feet into the swampy wooded area located south of the Facility [refer to <u>Appendix B, Photograph Log (Photographs 26-29)</u>].
Description of general gradients/slopes onsite, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches, driveway, pipes, & etc.)	The EPA Inspection Team observed the Facility graded southeast towards the stormwater retention pond and the swampy wooded area located to the southeast of the Facility. Stormwater from the retention pond would flow through Discharge Point #1 into the wooded area located to the east of the Facility [refer to <u>Appendix B, Photograph Log (Photograph 47)</u>]. Stormwater and commingled process wastewater would flow through Discharge Point #2 in the wooded area located to the south of the Facility [refer to <u>Appendix B, Photograph Log (Photographs 18-24 and 26-34)</u>]. Based off the observed slope of the entire area, stormwater and process wastewater which discharged into the swampy wooded area would potentially convey further southeast as overland flow towards an unnamed vegetated gravel swale located next to train tracks to the southeast of the Facility [refer to <u>Appendix B, Photograph Log (Photographs 49-53)</u>].

SECTION III – AREAS OF CONCERN

- 1) The EPA Inspection Team observed the facility engaged in manufacturing marble and granite countertops. The Facility's industrial activities include molding, shaping, and cutting marble and granite slabs into sinks and countertops. The EPA Inspection Team observed outdoor industrial activities consisted of storage of raw and cut granite and marble, rock molds, and loading/unloading operations. These activities are included in the description of SIC Code 3281 – Cut Stone and Stone Products. Businesses classified under SIC Code 3281 are regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.
- 2) The EPA Inspection Team observed two (2) discharge points.
 - a. Discharge Point #1 was the overflow from the on-site stormwater retention pond to the wooded area to the east of the Facility [refer to Appendix B, Photograph Log (Photograph 47)].
 - b. Discharge Point #2 had an active discharge of turbid process wastewater during the inspection [refer to Appendix B, Photograph Log (Photographs 18-23 and 26-29)]. The turbid process

wastewater originated in the Facility's southern warehouse where granite and marble are cut with wet saws.

- 3) The EPA Inspection Team observed white dust from the cutting operations outside on the paved concrete pad in the center of the Facility. This layer of white dust was located approximately 50 feet upgradient from the onsite stormwater retention pond [refer to Appendix B, Photograph Log (Photographs 6, 8, and 43)].
- 4) At the time of the inspection, the Facility did not have coverage under the 2021 Multi-General Stormwater Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity.
- 5) At the time of the inspection, the Facility also did not have coverage under a Texas Pollutant Discharge Elimination System (TPDES) permit for discharges associated with process related wastewater and/or process related storm water.

SECTION IV – LIST OF APPENDICES

Appendix A – Aerial Location

Appendix B – Photograph Log