



**United States Environmental Protection Agency
Region I – New England
5 Post Office Sq., Suite 100
Boston, Massachusetts 02109-3912**

Prompt and Complete Electronic Reply Required

Via Electronic Mail *(date indicated on electronic signature)*

Karin Marshall, General Manager
Boston Concrete Corporation
706 Broadway Street
Lowell, MA 01854
kmarshall@bostonconcrete.com

Re: Clean Water Act Site Inspection Report for Boston Concrete Corporation

Dear Ms. Marshall:

On March 25, 2021, the United States Environmental Protection Agency (“EPA”) conducted an announced inspection at Boston Concrete Corporation's concrete manufacturing plant located at 706 Broadway Street in Lowell, Massachusetts (the “Facility”). The inspector viewed the Facility’s concrete and block forming operations, material storage areas, industrial process and stormwater wastewater sources and disposal practices, run-off discharge paths, and oil storage containers. Please find attached the inspector’s report and pictures taken during the inspection.

The purpose of the site inspection is to evaluate concrete manufacturing industrial activities and stormwater and wastewater sources that may be subject to federal wastewater discharge regulations, specifically the industrial stormwater wastewater regulations at 40 Code of Federal Regulations (C.F.R) Part 122. The inspection also included a review of the Facility’s oil storage containers and transfer practices that may be subject to federal Oil Pollution Prevention Regulations at 40 C.F.R. Part 112.

The inspector reviewed the Facility’s June 5, 2017 stormwater pollution prevention plan (SWPPP) which was developed in accordance with EPA’s June 4, 2015 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (2015-MSGP). The EPA has completed its review of the document and finds the contents of the plan to be incomplete and not consistent with Part 5.2 of the permit, specifically Part 5.2.2 Site Description and Part 5.2.3 Summary of Potential Pollutant Sources.

For example, the SWPPP does not include or identify all stormwater discharge outfalls or pollutant sources such as the block forming operation, the concrete plant’s bag house, diesel oil tank, salt storage pile, and aggregate stockpiles.

Additionally, the Facility may not have performed and documented all required routine facility and quarterly visual outfall inspections. Please note that all outfalls and industrial activities and pollutant sources must be clearly identified in your amended SWPPP and new the Notice of Intent that the Facility is required to submit electronically to EPA by May 30, 2021 to receive permit coverage under the 2021-MSGP.

A review of storm water sampling results submitted by the Facility starting in 2018 shows a number of exceedances above benchmark standards for Total Suspended Solids (TSS) and total iron. Under Part 4 of the 2015-MSGP, the Facility may not have fully conducted a review of control measures identified in the SWPPP and implement any necessary modifications and/or corrective actions to reduce pollutant levels. According to the Facility's 2018 Annual Report a catch basin should have been installed, but as of the date of this report it has not been installed.

The Facility generates industrial process wastewaters from its concrete block forming and related concrete manufacturing operation. The inspector informed Facility representatives process wastewaters generated from the block forming activity have the potential to discharge to the Canal and the discharge of process wastewaters without permit coverage is a violation of EPA's wastewater discharge regulations.

The Facility has an earthen dug sedimentation pit that it uses to dispose of rinsewater, a process wastewater generated during the cleaning of concrete trucks (i.e., chute, and barrel). A Facility representative indicated that the wastewater in the pit either infiltrates into the ground and/or evaporates and doesn't overflow. The Facility should note that the Commonwealth of Massachusetts has certain rules regarding subsurface disposal systems that the Facility may want to review. In addition, a portion of the pavement area next to the washout station is sloped toward Outfall C. Any rinsewater discharged through Outfall C would be an unauthorized and unpermitted discharge under the 2021 MSGP.

The EPA inspector observed certain Facility operated oil tanks which have a combined total oil storage capacity greater than 1,320-gallons, and as such the Facility is required to develop and implement a federal oil spill prevention, control, and countermeasure (SPCC) plan. At the time of the inspection, the Facility did not have a SPCC plan. Following the inspection, on March 26, 2021 the inspector electronically mailed the Facility a "Notice of SPCC Inspection and Deficiencies" form. The form request the Facility correct the deficiencies, and if the Facility is not required to have an SPCC Plan submit an explanation as to why the Facility is not subject to the SPCC provision of the Oil Pollution Prevention regulations. On April 20, 2021, the Facility informed EPA it is not feasible to correct the deficiency within 30-days of the Notice and additional time is needed because a consultant was recently retained on April 9, 2021 for this work; and COVID-19 safety protocols slowdown work flow. The estimated date for SPCC Plan completion is May 30, 2021.

Within 30 days of receiving this letter, we request you provide a written response to the findings and deficiencies identified in the report. Included as part of the report are pictures taken by the inspector. Certain pictures may contain comments in parentheses which should also be addressed in your response to this report.

EPA is requesting you provide an electronic reply to this email acknowledging receipt of the inspection report, and your response to the report should be sent electronically to Joseph Canzano, Oil Spill Enforcement Officer, at:

canzano.joseph@epa.gov

EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this information request while still ensuring that EPA receives the information it

needs to timely confirm your company's compliance with the Clean Water Act. If you think you will be unable to respond to this letter within 30 days due to COVID-19 impacts on your business, please contact Mr. Canzano at the email addresses above.

Attached is a link to EPA's Small Business Resources Information Sheet¹ which is intended to assist small businesses, as defined by the Small Business Administration at 13 C.F.R. Part 121.201, in understanding and complying with environmental regulations.

Should you have any questions regarding your Facility's responsibilities under EPA's wastewater discharge regulations, specifically the industrial stormwater wastewater regulations at 40 Code of Federal Regulations (C.F.R) Part 122, or the federal oil pollution prevention regulations at 40 C.F.R. Part 112 you may contact Mr. Joseph Canzano of my staff by e-mail at canzano.joseph@epa.gov, or by telephone (617) 918-1763.

Sincerely,

NEIL HANDLER
Digitally signed by NEIL
HANDLER
Date: 2021.04.29 13:24:21 -04'00'

Neil Handler, Senior Enforcement Coordinator
Enforcement and Compliance Assurance Division

Enclosures: (electronic)

1. Inspection Report
2. Photo Log

cc: Jeff Kopf, EPA, kopf.jeff@epa.gov
Kevin Brendan, MassDEP, kevin.braner@state.ma.us
Scott Fasulo, MassDEP, scott.fasulo@state.ma.us

¹ <https://www.epa.gov/sites/production/files/2017-06/documents/smallbusinessinfo.pdf>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

Enforcement & Compliance Assurance Division
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Subj: Inspection Report
Clean Water Act

Inspector: Joseph Canzano, Clean Water Act Inspector & Compliance Engineer
Enforcement & Compliance Assurance Division (ECAD)
Water Compliance Section (WCS)

**JOSEPH
CANZANO** Digitally signed by
JOSEPH CANZANO
Date: 2021.04.29
12:38:06 -04'00'

I. Facility Information

A. Facility Name: Boston Concrete Corporation (the "Facility")
<https://bostonconcrete.com>

B. Facility Location: 706 Broadway Street
Lowell, MA 01854
42° 38' 22" N
71° 19' 42" W

C. Facility Contacts: Ms. Karin Marshall, General Manager
kmarshall@bostonconcrete.com
(978) 937-7222 (Tel)
(978) 265-6311 (Cell)

Roger Ploof, President
rploof@sandcorp.com

D. ID No(s): ICIS-NPDES (MAR054014)
Facility Registry Service ID (110070079042)

II. Background Information

A. Date(s) of inspection: March 25, 2021

B. Weather Conditions: Light Rain, 60-degree Fahrenheit.
Previous Measurable Storm Event .66 inches¹ on March 18th.

C. US EPA Inspector(s): Joseph Canzano

D. State/Local Representative(s): None

E. Federally Enforceable Requirements Covered During the Inspection:

- 40 C.F.R. Part 112, Oil Pollution Prevention Regulations
- 40 C.F.R. Part 122.26, NPDES² Stormwater Regulations

III. Type and Purpose of Inspection

The purpose of the site inspection is to view the Facility's concrete plant and wastewater sources that may be subject to federal wastewater discharge regulations, specifically the industrial stormwater regulations identified under the Clean Water Act. The inspection also included a review of oil storage tank/s and transfer practices subject to the federal oil pollution prevention regulations.

IV. Disclaimer:

Unless otherwise noted, this report describes conditions at the Facility/property as observed by EPA, and/or through records provided to and/or information reported to EPA by Facility representatives and as understood by EPA. This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern or issue. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or more formal action.

V. Facility Description & History

The Facility produces standard ready-mix concrete and inter-locking concrete blocks. It's Standard Industrial Classification (SIC) Code is 3271. The plant operations began sometime in 2017, operates Monday through Friday, 5:00 a.m. through 5:00 p.m., and employees about 25 full-time employees. The plant has the capacity to produce 70,000 yards of concrete per year, and about 1,200 to 1,500 cubic yards of concrete per day. Product is delivered to the job sites using front-discharger mixer concrete trucks, and aggregate material is moved throughout the site using a loader and skid-steer loader.

The Facility's estimated operating area is 78,587 square-feet. Part of the site's property line borders the Pawtucket Canal (or "Canal") for a distance of 200 feet. The site's slope is

¹ <https://www.wunderground.com/dashboard/pws/KMALOWEL54/table/2021-03-30/2021-03-30/monthly>

² National Pollutant Discharge Elimination System ("NPDES").

from east to west and runoff flows toward the west and the Canal. The site appears to have three drainage areas and outfalls. Two outfalls discharge to the Canal and the third outfall to the City of Lowell's stormwater sewer system. Outfalls in this report are labeled and shown as "EPA Outfall A", "EPA Outfall B/SWPPP Outfall #1", and "EPA Outfall C" on aerial Plate A and Plate C in the attached EPA Inspection Photographic Log.

On June 5, 2017, the Facility filed for permit coverage under EPA's 2015 industrial stormwater general permit³ by submitting a federal Notice of Intent (NOI) form. The Facility identified itself as being privately owned, applicable under primary sector E (Subsector E2) of the permit, and only having a single outfall to the Lowell Canal. Subsector E2 in the 2015-MSGP is associated with the manufacturing of Concrete, and Gypsum Products. On July 5, 2017 (3rd Quarter 2017) the EPA has record of the Facility receiving permit coverage to discharge stormwater associated with Industrial Activities from one outfall (Outfall 001) to the Canal under the 2015-MSGP.

The 2015-MSGP requires, among other things, the Facility electronically submit annual stormwater reports to EPA by January 30th of each year for the previous calendar year. EPA conducted a records review and confirmed on January 29, 2018 (2017 annual report), January 10, 2019 (2018 annual report), and March 29, 2021 (2020 annual report) record of receiving the Facility's annual stormwater reports in EPA's NeT MSGP system. There is no record of the facility submitting its 2019 annual report.

The 2015-MSGP also requires the Facility to collect and analyze stormwater discharges into the Canal from its outfall/s on a quarterly basis and compare the results to specific benchmark criteria identified for Total Suspended Solids (TSS) and total iron. Stormwater wastewater discharge monitoring results for TSS and total iron submitted by the Facility into EPA's NetDMR system are consistently above permit standards, see Table 1.

³ June 4, 2015 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (2015-MSGP)

Table 1				
Boston Concrete				
Stormwater Wastewater Discharge Sampling Data				
Sector E, Table 8.E-1				
MSGP Quarters	Total Suspended Solids (TSS) "mg/l" Benchmark Standard 100 mg/l	Total Iron (Fe) "mg/l" Benchmark Standard 1 mg/l	Submission Date into NetDMR	NetDMR Due Date
Q4 - 2017	No Data Submitted into NetDMR			2/28/2018
Q1 - 2018	610	20.70	05/03/18	5/28/2018
Q2 - 2018	280	8.15	9/19/2018†	8/28/2018
Q3 - 2018	460	15.00	09/19/18	11/28/2018
Q4 - 2018	970	24.00	01/10/19	2/28/2019
Average	580	16.96		
Q1 - 2019	110	3.04	3/19/2019	5/28/2019
Q2 - 2019	830	13.20	7/9/2019	8/28/2019
Q3 - 2019	240	9.73	9/10/2019	11/28/2019
Q4 - 2019	940	20.30	9/18/2020†	2/28/2020
Average	530	11.57		
Q1 - 2020	2,100	20.10	9/18/2020†	5/28/2020
Q2 - 2020	NODI - H (Invalid Test - Wrong Location)		9/18/2020†	8/28/2020
Q3 - 2020	16	19.00	10/1/2020	11/28/2020
Q4 - 2020	470	18.00	12/24/2020	2/28/2021
Average	862	19.03		
Red highlighted numbers indicate average of four samples results exceed benchmark standard.				
† Discharge Monitoring Report (DMR) submitted past due date.				

The average result for TSS and total iron from Quarter 1 2018 through Quarter 4 2020 is 833 milligrams per liter (mg/l) and 15.85 mg/l, respectively. The benchmark standards listed in the 2015-MSGP in Table 8.E-1 is 100 mg/l for TSS and 1.0 mg/l for total iron. Stormwater discharge results for TSS and total iron are 733% and 150% above the standards respectively.

The 2015 MSGP requires a facility that has collected four quarterly samples, whose average for the four monitoring samples is above the benchmark, to review its control measures as described in the facility's SWPPP to determine if modifications are necessary. If modifications or corrective actions are warranted, they should be performed immediately, and the facility should conduct four additional quarters of monitoring to evaluate the effectiveness of the new control measures. The average of the four additional monitoring samples should then be compared to the benchmark and the process for modifying the control measures repeated if the results are above the benchmark. Alternatively, a facility if appropriate, may decide that no further pollutant reductions are technologically available and economically practicable and achievable considering best industry practice to meet the technology-based effluent limits. The facility must document its rationale for concluding that no further pollutant reductions are achievable, and retain all records related to this documentation with its SWPPP and must continue monitoring for the benchmark parameters once per year.

The 2018 annual report indicates installation of catch basin at the outfall as a new proposed corrective action, and actions such as pavement sweeping and use of filter socks as immediate and ongoing actions to reduce the elevated benchmark results noted.

The 2020 annual report indicates for major corrective actions implemented during 2020 year included the relocation of Outfall 001 to provide a representative sample of stormwater runoff discharging from plant operations, and the placement of a filter medium at the entrance to the outfall, improved housekeeping, installation of a berm and additional filtration at the outfall, and diversion of stormwater runoff to a settling area prior to discharging through the outfall. Its unclear whether all of the proposed corrective actions have been implemented by the Facility and whether those corrective actions are sufficient given the continued exceedance of the benchmark criteria for TSS and total iron.

On March 2, 2021 (prior to the site inspection), the Facility provided EPA with an electronic copy of the Facility's June 5, 2017, SWPPP. EPA reviewed SWPPP, NOI, stormwater wastewater sampling data, and annual reports. On March 10, 2021, EPA provide the Facility with the following preliminary comments: (1) the Facility incorrectly reports it's a cement manufacturer on its NOI, (2) the 2019 and 2020 stormwater annual reports do not appear to have been submitted into EPA's NeT system by the Facility, and (3) the Facility may have used the wrong water quality impairment segment for the receiving stream when completing the NOI.

VI. In-Briefing – Telephone Call February 26, 2021

The site inspection was announced, and initial contact with the Facility occurred by telephone on February 26, 2021 by Inspector Canzano. Inspector Canzano informs Facility representatives (Ms. Karin Marshall, General Manager, and Mr. Pat O'Brien, Health & Safety Manager) of EPA's proposed site inspection. The inspection is being conducted under the authority of the Clean Water Act and will focus on a review of the Facility's ready-mix concrete operations and industrial activities, stormwater wastewater sources and discharges, and oil storage, transfer, and spill prevention practices.

Inspector Canzano informs Ms. Marshall and Mr. O'Brien the Facility is shown as being in significant noncompliance for stormwater wastewater discharge permit related matters on EPA's Enforcement and Compliance History Online (ECHO)⁴ Internet application. Facility representatives were unaware of EPA's ECHO application. Inspector Canzano talks about elevated stormwater wastewater monitoring results entered by the Facility into EPA's NetDMR system which communicates with EPA's ECHO application. The results for TSS and Fe are consistently above the benchmark monitoring standards.

For reducing TSS and total iron levels Inspector Canzano points to information in the Facility's 2018 stormwater annual report. The report notes the Facility would be installing a catch basin, increase pavement sweeping and the use of filter socks as part of its corrective actions. Ms. Marshall informs Inspector Canzano the catch basin has not been installed; the Facility owns two street sweepers that are used regularly and it uses filter socks at the outfall.

⁴ <https://echo.epa.gov/>

Additionally, the TSS and total total iron samples submitted to EPA may not have been collected at the sampling location shown in the June 5, 2017, SWPPP's site diagram⁵, i.e., a location before the catch basin shown as a red dot and labeled "Sample Location #001"⁶. Ms. Marshall indicates the results submitted may have been collected in the vicinity of the block forming operation. Additionally, the configuration of the Facility has changed since the development of the SWPPP.

In late 2018 or early 2019, the Facility acquired the use of an equipment service garage/building and started making concrete blocks. In addition, during this time frame a stormwater team member who was helping to assure compliance with the 2015 MSGP left the company. Ms. Marshall indicated that as a result, certain tasks might not have been fully completed such as annual report submission/s, documentation for routine facility and quarterly visual outfall inspection/s, but that the Facility's operations under review and the SWPPP will be amended, and the consultant would be submitting the 2020 stormwater annual report⁷.

Inspector Canzano informs Ms. Marshall and Mr. O'Brien that EPA reissued a new MSGP on March 1, 2021, and that existing facilities need to up-date SWPPPs and reapply for coverage no later than May 30, 2021. Additionally, for the ready-mix concrete manufacturing sector (Sector E), in the 2021-MSGP, EPA discontinued benchmark monitoring for total iron and includes a sampling requirement for Indicator Monitoring for Polycyclic Aromatic Hydrocarbons (PAHs)⁸ under certain conditions. Operators with stormwater discharges from paved surfaces that will be sealed or re-sealed with coal-tar sealcoat where industrial activities are located during coverage under this permit are required to complete Indicator Monitoring for PAHs.

Inspector Canzano is informed the Facility operates a diesel fuel-oil tank for refueling concrete trucks and loaders. Ms. Marshall is unsure of the tanks volume. It may store more than 1,320 gallons. Inspector Canzano outlined EPA's the oil pollution prevention regulations regarding the requirement for developing and implementing an oil spill prevention, control, and countermeasure (SPCC) plan.

VII. Site Inspection – March 25, 2021

I arrived at the site at ~9:00 a.m., greeted by the following Boston Concrete employees: Mr. Roger and Mr. Steve Ploof, Co-Owners, Ms. Karin Marshall, General Manager, Mr. Pat O'Mally, Health & Safety Manager, and Boston Concrete's environmental engineering consultant Mr. Derek DeCastro from SAK Environmental, LLC. ("Boston Concrete Team" or "Team").

⁵ Prepared by SAK Environmental, date May 31, 2017.

⁶ Labeled on aerial diagram Place C as EPA Outfall B/SWPPP Outfall #1.

⁷ Submitted March 29, 2021.

⁸ naphthalene, acenaphthylene, acenaphthene, fluorene, phenanthrene, anthracene, fluoranthene, pyrene, benzo[a]anthracene, chrysene, benzo[b]fluoranthene, benzo[k]fluoranthene, benzo[a]pyrene, benzo[g,h,i]perylene, indeno[1,2,3-c,d]pyrene, and dibenz[a,h]anthracene.

I introduced myself and presented my credentials and explained the purpose and scope of the inspection, and indicated I would be reviewing the Facility's concrete plant and wastewater sources that may be subject to federal wastewater discharge regulations, specifically the industrial stormwater regulations. The inspection would also include a review of oil storage tank/s and transfer practices subject to the federal oil pollution prevention regulations. I was granted permission to conduct the site inspection.

Mr. Roger Ploof indicated the neighboring business, S&R Corporation, is owned and operated by the Ploof family, and the building occupied by the automotive body supply is rented and not operated by the Ploof family. Mr. Roger Ploof indicated that S&R Corporation and Boston Concrete Corporation are separate companies.

The site walk started at the equipment service garage.

Equipment Service Garage and Drainage Area A

The area fronting the equipment service garage is asphalt paved, and the ground slopes from the garage's bay doors toward Broadway Street. Runoff flows off the site onto Broadway Street and then into a municipal street drain. EPA Outfall A and City of Lowell MS4 Drain is labeled in EPA's Plate C diagram provided in the attached EPA Inspection Photographic Log. Inspector Canzano informs Ms. Marshall the Broadway Street entrance is a discharge/outfall location and would be a representative location for collecting a stormwater wastewaters sample from the drainage area, and the amended SWPPP site diagram requires the identification of municipal separate storm sewer systems.

In the service garage Inspector Canzano observes floor drains, a tank labeled 15W-40 motor oil, an equipment power washing unit, two parked concrete trucks, a drum and two totes filled with liquid. The floor in the garage is concrete and is sloped inward, toward the center of the garage and floor drains. An oil or chemical spill in garage is expected to stay in the garage and flow into the drain/s.

The Team indicates some equipment is power washed but concrete truck washing is performed at the concrete wastewater washout pit. Natural gas is used as fuel in the power washer unit to make hot water. Inspector Canzano informs the Team that wastewaters generated from equipment and or concrete truck cleaning are process wastewaters and are prohibited for discharge under the EPA's MSGP. Ms. Marshall indicated that the floor drains connect to the sewer system, but not completely sure if it's the stormwater or sanitary sewer system. The Team indicates they might have plumbing drawings for the building.

The Team did not know the exact capacity/volume of the motor oil tank. Inspector Canzano informs the Team the tank is about 120-gallons, and it's volume would be included when determining the Facility's overall/total oil storage volume relative to the federal oil regulations, i.e., total threshold amount for aboveground capacity is 1,320-gallons in 55-gallon containers or above. Next to the garage bay doors the Facility stores totes, and Mr. Ploof indicates there is no oil in the totes. The totes may contain a surfactant type chemical that prevents the concrete mix from sticking to the inside of the concrete truck's drum. Inspector Canzano recommended spill kit and mats for the garage floor drains.

Ms. Marshall indicated that the equipment service garage/building is a new addition to the Facility's operations, and it will be included in the amended SWPPP.

Access Road, Oil Tanks, Parked Concrete Trucks and Drainage Area B

Mr. Steve Ploof and Mr. Roger Ploof exited the inspection.

The inspection then moved to the access road which is located to the southwest of the Equipment Service Garage. Runoff from the access road, beginning at the auto supply store and extending to an area fronting the service garage operated by S&R Corporation, ultimately flows toward Outfall B/SWPPP Outfall #1, see EPA's Plate C diagram. Runoff prior to discharge into the Canal crosses the site's entrance/exit at Thomas Street. Inspector Canzano observes the drainage area, as a whole, slopes from east to west. Flow from the area appears to be surface discharge into the Canal, i.e., no observed discharge pipe. Runoff flows over the top of the wall and discharges into the Canal. At Outfall B Inspector Canzano observes crushed stone and sedimentation filter socks along the edge of the wall and in front of the outfall. Ms. Marshall indicated the Facility is trying to implement filter controls and crushed stone to reduce solids in the discharge. Inspector Canzano recommended the addition of an oil absorbant sock/s.

Located along the access road, Inspector Canzano observed an equipment storage area, parked concrete trucks, a salt storage bin, roll-off container, and several fuel-oil tanks. Ms. Marshall indicated that the salt storage pile and roll-off, equipment storage area and two of the fuel-oil tanks (the red and yellow tanks) belong to S&R Corporation and are not affiliated with the Facility. Inspector Canzano informs the Team pollutant sources from the industrial activities operated by S&R Corporation may impact the Facility's stormwater wastewater results at the outfall. Ms. Marshall indicates the pavement and access road is maintained by both S&R Corporation and Boston Concrete and is frequently swept by Facility owned street sweepers.

It appears certain areas of the site are shared between S&R Corporation and Boston Concrete, and Inspector Canzano informs the Team that the Facility's SWPPP may need to include industrial activities operated by S&R Corporation. Facility stormwater wastewater that commingle with source/s from another business may not be authorized under the MSGP, and any required stormwater wastewater sampling must be performed at a point before they mix, to the extent practicable. Inspector Canzano recommends to the Team including the industrial activities operated by S&R Corporation in the Facility SWPPP.

Next to the outfall, along the edge of the Canal wall, the Facility stores certain equipment and material, i.e., excavator bucket. Inspector Canzano recommends moving the equipment back for Facility personnel to have safe access between the equipment storage area and the edge of the Canal.

Inspector Canzano observes two oil spills on the pavement from concrete trucks. The first next to the Facility's diesel fuel oil tank, and the second spill in front of S&R Corporations service garage. Inspector Canzano recommends the spills be cleaned, a spill kit be placed in close proximity of the tank/dispenser, and the operators for the trucks be informed of the spill. Inspector Canzano also points to no crash bollards for protecting the tanks from an unexpected crash/accident from a truck and recommends bollards be installed. In the event

of an unexpected and sudden oil spill from a tank from crash accident may result in an oil spill to the Canal.

Inspector Canzano informs the Team the total oil storage capacity for the diesel oil tank operated by the Facility appears to be greater than 1,320-gallons and may be applicable under EPA's oil storage regulations. The tank is manufactured by Highland Tank and is double-walled and estimated to be 64 inches in diameter and 9 feet in length. The total tank volume is 1,500 gallons⁹. Inspector Canzano informs the Team the tank should be equipped with a visual liquid level dial gauge.

Additionally, Inspector Canzano informs the Team, based on observations of S&R Corporation's fuel tanks, S&R Corporation may also need to develop an SPCC plan.

Concrete Plant and Block Forming, Aggregate Storage Bins, Truck Chute/Barrel Cleaning and Rinsing Operation, Concrete Wastewaters Sedimentation Basin/Pit, and Drainage Area C

The area is asphalt paved and entire area slopes from the concrete plant toward the concrete block forming station where the outfall is located. All the run-off from the area ultimately flows toward Outfall C, see EPA's Plate C diagram. Inspector Canzano observes a metal pipe protruding from the canal wall, and Ms. Marshall noted that stormwater discharge sample results entered into NetDMR by the Facility and reported above the benchmark standards may have been collected from the metal pipe or a location prior to the pipe's outlet. Inspector Canzano recommends a spill pipe plug, and a life preserver/vest be placed in close proximity of the edge of the canal and the outfall pipe's sampling location.

Industrial activities observed in the area include several aggregate material bins for storing sand and crush stone, concrete block forming, concrete plant and bag house, and truck chute and barrel rinsing/cleaning and a concrete wastewater storage sedimentation basin/pit. Inspector Canzano informs the Team that the MSGP requires all industrial activities including the plant's bag house be labeled on the Facility diagram and be addressed in the SWPPP.

Periodically portions of the concrete trucks (i.e., body, chute, and barrel) require cleaning and rinsing with water. Inspector Canzano observed an operator washing a truck and process wastewaters from the activity gravity flow into earthen dug sedimentation pit. A portion of the pavement area next to the washout station is sloped toward Outfall C and Inspector Canzano informs the Team that process wastewaters have a potential to not flow into the pit. The Team was unable to confirm the volume of the pit and pointed to the storage bin for dredged pit material. Inspector Canzano informs the Team liquid waste/drag-out from solids in the storage bin are process wastewaters and must flow back into the pit. Inspector Canzano estimates the pit size to be 25 feet long, 30 feet wide and 4 feet deep. Ms. Marshall indicates wastewater in the pit infiltrate and evaporate and doesn't overflow. Inspection Canzano noted that the Commonwealth has certain rules regarding subsurface disposal systems that the Facility may want to review. Inspector Canzano recommends a more formally engineered and constructed system to manage wastewaters and that the Team review the pavement grade. Finally, Inspector Canzano notes to the

⁹ $V=(3.14)(r^2)(h) = (3.14)(7.11 \text{ square-feet})(9 \text{ feet}) = 200 \text{ cubic-feet} = 1,500\text{-gallons}.$

Team the wall of the pit may be in proximity from the plant's foundation wall, and the Facility may want to consult with a structural engineer.

Concrete block forming may be conducted when concrete product remains in the truck barrels returning from the job site or if the Facility receives and order for blocks. The block forming station is located on the edge of the site and the Canal. Inspector Canzano informs the Team cleaning or rinsing waters generated from the activity are process wastewaters and not authorized for discharge to the canal under EPA's MSGP. Ms. Marshall indicates that the block forming operation is not original to the plant, and the Facility started making blocks one or two years after opening. Inspector Canzano recommends the Facility review the block forming activity for all potential wastewater sources and discharge path. Due to the pavement slope and proximity to the Outfall C, the Facility may need to reengineer the operation to ensure the capture for process wastewaters and reduce the likely hood for commingling with stormwater wastewaters prior to discharge to Outfall C.

Concrete trucks are front load and dispense type. Operators position the front of the truck in the loading bay for uploading with sand, stone, cement, and water. A conveyor moves sand and stone from an enclosed storage building into the plant where it is then loaded in the truck's barrel with cement and water. The cement is stored in silos. Following the uploading process, trucks are put into reverse gear and exit the bay. Inspector Canzano observes a truck uploading and standing and pooling water on the floor of the bay. According to Ms. Marshall, water is placed on the floor of the bay by workers in order to prevent excessive wearing on transfer hoses when pressurized, the water is not associated with the concrete mixing process and it evaporates. The plant has the ability to produce as much as 1,200 yards of concrete per day, but typically daily production is about 550 yards per day.

VIII. Closing Conference

Following the site walk the following issues and observations were discussed with Ms. Marshall, Mr. O'Brien, and Mr. DeCastro.

- Inspector Canzano informs the Facility to begin to address issues raised and EPA may follow-up with a formal letter requesting certain information.
- The EPA has no record of the Facility submitting a 2019 annual report into EPA's NeT MSGP system or submitting monitoring data into NetDMR system following the 4th Quarter 2019 year, i.e., (October 2019 through December 2019).
- The Facility's June 5, 2017 SWPPP is not accurate. The plan doesn't reflect all industrial activities, drainage areas, stormwater wastewater outfalls or control measures occurring on the property.
- Stormwater sample results are elevated and above benchmark standards for total suspended solids (TSS) and total iron, and the most likely source is uncovered aggregate stockpiles.

- The Facility's choice for control measures to reduce solids and iron levels includes pavement sweeping, and crushed stone and filter socks at outfalls. The Facility's selection of control measures is insufficient.
- Facility unit operations/industrial activities have potential to generate process wastewaters and commingle with stormwater wastewaters prior to discharge into the Canal, specifically the Facility's block forming, concrete loading, and truck chute and barrel washing at the pit.
- Facility appears to be applicable under the federal oil regulations and needs to develop an oil spill prevention, control, and countermeasure (SPCC) plan.

End of report.