

REPORT OF COMPLIANCE SAMPLING INSPECTION (CSI)

Concrete Equipment Company (Con-E-Co)

237 North 13th Street

Blair, NE 68908

NPDES NO: NE0139416 (pretreatment)

NER910535 (stormwater)

April 19-20, 2022

BY

U. S. ENVIRONMENTAL PROTECTION AGENCY

Region 7: Enforcement and Compliance Assurance Division (ECAD)

INTRODUCTION

I performed a Compliance Sampling Inspection (CSI) at the Con-E-Co in Blair, Nebraska from April 19, 2022, through April 20, 2022. The inspection was authorized by Section 308(a) of the Federal Water Pollution Control Act, as amended. This narrative report presents the findings of the inspection.

PARTICIPANTS

Concrete Equipment Company (Con-E-Co)

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PROCEDURES

On April 19, 2022, I arrived unannounced at the Con-E-Co facility along with NDEE staff at approximately 1:00 p.m. We met with Ron Stamper and Gary Stillman in a conference room. I introduced myself, presented my credentials, and explained the purpose and procedures of the inspection. These procedures included completing the industrial user checklist (attachment 1), completing the industrial storm water worksheet (attachment 2), conducting a facility walk-through with photos (attachment 3), reviewing the self-monitoring records, reviewing the Storm Water Pollution Prevention Plan (SWPPP), collecting samples prior to discharge, and conducting an exit meeting. Mr. Gillman and Mr. Stamper led a facility tour and provided requested

documentation.

On April 19, 2022, I collected grab samples of process wastewater from the below ground pit (Outfall 001). The samples were poured into clean, pre-labeled Nalgene containers for the analysis of Total Cyanide, mercury, and metals. The Total Cyanide sample was preserved using sodium hydroxide. The mercury and metals samples were preserved with nitric acid. The pH of the sample was analyzed within 15 minutes of collection using a field meter prior to preservation. The facility personnel provided calculated flow for that day.

On April 19, 2022, I placed the samples I collected on ice in an ice chest, sealed the container and shipped it overnight to the EPA Region 7 Science and Technology Center (STC) for analysis. I followed Region 7's LSASD standard operating procedures in the collection, packaging, transportation, and handling of the samples. Field Sheets and the Chain of Custody form were electronically submitted following Region 7 procedures.

FACILITY DESCRIPTION

The Con-E-Co facility is owned and operated by Astec Industries. The legal description of the facility's location is the SW ¼, SW ¼, Section 12, Township 18 North, Range 11 East within Washington County, Nebraska. The mailing address for the facility is 237 North 13th Street, Blair, Nebraska 68908. Their pretreatment National Pollutant Discharge Elimination System (NPDES) Permit NE0139416 was reissued on January 1, 2018, with an expiration date of December 31, 2022 (attachment 7). The authorization to discharge storm water associated with industrial activity under NDEE's General NPDES Permit NER910000 (facility permit NER910535) was reissued on July 18, 2016, and administratively extended to expire on September 28, 2022 (attachment 8). Portable concrete plants are manufactured and assembled at the facility. The facility receives raw metal and unfinished parts which are prepared for painting prior to assembly.

Process wastewater is produced during the paint preparation processes located indoors. The facility purchases water from the City of Blair through a metered connection for use as dust control and process water (photo 18). The amount utilized for each purpose is logged daily. A reverse osmosis (RO) system is utilized to meet the facility's water quality needs. Zirconium is added to the RO wash water to pretreat metal. Then, the metal is rinsed using hot RO water. The water from these two steps is collected in floor drains and diverted to a below ground collection pit (photo 8). Caustic soda for increasing the pH is automatically added to the collection pit and the quantity is based upon the amount of flow (photo 20). Wastewater from the collection pit gravity-flows to an adjacent wet well. The wet well has a sump pump which is activated automatically as the water level rises (photo 8). Wastewater from the wet well is discharged to the City of Blair POTW daily. Facility personnel check the pH of the wastewater in the wet well at least twice per day with a pH meter.

Process sludge settles in the collection pit. Mr. Stamper explained the process for removing sludge. In preparation for sludge removal, process wastewater is pumped from the collection pit,

so the sludge can air dry. Facility personnel then shovel the sludge into 55-gallon drums. The sludge is hauled away by Rineco-Heritage Environmental Services. Manifests of each sludge hauling are maintained by the facility.

North 12th Street bisects the facility into east and west sections. The east section is where raw materials and parts are received and stored outdoors. Also, the east section has buildings where raw metal is shaped, cut, welded, and sanded to the desired specifications. Stormwater runoff flows east offsite to a ditch which flows into a stormwater swale (photo 12). Stormwater from the swale flows approximately 1.3 miles via ditches to reach an unnamed tributary and travel another 0.5 miles to the Missouri River. Graveled surfaces are located in various places on the east section: on the south boundary along the railroad tracks, around north storage buildings, and at raw material storage areas.

The parts are then moved to the west section for painting and assembly. The final products are stored outdoors on the west section. Outdoor waste bins are covered (photo 10). Most of the outdoor part bins are parked under covers (photos 3, 5). One 500-gallon aboveground storage tank (AST) containing diesel and one 500-gallon AST containing gasoline are located in the alley (photos 1, 2). Additional chemicals are stored in sealed shipping containers (photo 6). No evidence of leaks was noted around these containers. A spill kit is located in the paint storage room near the exit door to the alley (photo 19). Most of the employee vehicles and motorized equipment are parked on concrete surfaces (attachment 4). Some graveled areas are located along the railroad tracks and at the far west (photos 4, 7, 9). Stormwater either evaporates or flows offsite at multiple points: north to State Street near 13th Street, north to State Street near 14th Street, east to 12th Street. Runoff then enters the city storm sewer via curb inlets and is directed to the same stormwater swale mentioned above. The curb inlets appeared clear and did not show evidence of pollutants discharged from the Con-E-Co facility.

FINDINGS AND OBSERVATIONS

The following findings were noted during the plant tour and record review. These findings were discussed with all the participants during the exit meeting.

Self-Monitoring Data Review

I obtained a spreadsheet of the NetDMR data for Con-E-Co from January 2017, through December 2021, and reviewed the data. During the inspection, I also obtained an electronic copy of the facility's laboratory analytical results from years 2019-2022. Effluent limit violations for pH occurred in December of 2019, March of 2020, and June of 2021 (NOPF 3). In 2018, the zinc limit was exceeded in March, and the pH limit was not met in December.

Sample Results

The analytical results from the inspection were received on May 17, 2022, from the Region 7 STC laboratory. This data was not discussed during the exit meeting. The analytical results for Total Cyanide and mercury of the samples I collected showed these analytes were not detected. Analytical results for the metals that were analyzed can be found in attachment 9. Based on the sampling data, the facility did not violate the effluent limits set forth in the NPDES permit during the inspection.

Sludge

Industrial sludge produced by the facility is currently hauled away and disposed of by Rineco. An electronic copy of the Rineco manifests was provided (attachment 10). According to the manifests, 1,363 pounds of solids were moved off site in 2019, 4,217 pounds in 2020, 4,267 pounds in 2021, and 600 pounds have been removed in 2022.

Laboratory

Facility personnel analyze the pH from the wet well at least twice per day and maintain a log of the results. Additional process sampling is conducted when the production of process wastewater increases. The pH sample analysis performed by the facility personnel appears to conform with the pretreatment NPDES permit and Chapter 40 Part 136 of the Federal Code of Regulations. The remaining permit-required sample analyses are contracted to Midwest Laboratory, Omaha, NE.

Storm Water Pollution Prevention Plan (SWPPP)

I reviewed the SWPPP to determine whether it met the requirements of the industrial storm water general NPDES permit NER910000. An electronic copy of the SWPPP was provided (attachment 6). The SWPPP did not meet the content or implementation requirements of the permit (Notice of Preliminary Findings 1 and 4).

1. Although the SWPPP has blanks for a representative to sign certifying the document is accurate, Mr. Stamper and Mr. Gillman were unable to find a signed copy. Section 5.1.7 of the NPDES permit requires the SWPPP to be signed and dated.
2. The SWPPP states employees will be provided “annual information and training on preventing stormwater pollution in their work area.” Con-E-Co was unable to provide records documenting facility personnel training on the SWPPP content in 2019, 2020, or 2021. Training of all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of the permit is required by NPDES permit section 2.1.2.9.
3. The SWPPP was not up to date. Some personnel listed in the SWPPP were no longer employed by Con-E-Co. The site inspection frequency and inspection type are not correctly detailed in accordance with NPDES permit Section 4.1, 4.2, and 4.3 requirements. The SWPPP map does not include all the required details according to

NPDES permit section 5.1.2. Map details such as potential pollutant sources (i.e. waste bins, designated vehicle and equipment parking areas), municipal storm sewer inlets, and stormwater monitoring points.

4. Monthly routine site inspection reports were provided electronically. These reports did not include quarterly visual assessments of a stormwater discharge, annual comprehensive site inspection documentation, and at least one routine site inspection during a stormwater discharge. Since at least January 2019, inspections have not been conducted according to the requirements of the NPDES permit sections 4.1, 4.2, and 4.3. As of the date of the inspection, the facility failed to document the required 13 quarterly visual assessments, 3 annual comprehensive site inspections, and 3 routine site inspections during a stormwater discharge.

Operational Issues and Observations

I observed all areas of the facility during the inspection (photos 1-20). While touring the facility, I noted three housekeeping issues and listed them as on the NOPF as item number 2.

1. There was staining on the concrete near the diesel AST indicating a release of diesel had occurred (photo 2). Mr. Gillman and Mr. Stamper were unsure of the cause of the staining on the ground but suspected a recent overfill by the fuel delivery company may be connected to the release. Documentation of the spill and corrective measures were not included with the SWPPP.
2. Bindings and wood debris in the outdoor storage areas were on the ground with the potential to enter the stormwater runoff (photos 10, 12).
3. Staining on the concrete underneath two company trucks indicated that the trucks had leaked fluids (photos 15, 16). There was no method for capturing or containing the leaked fluids. There was also no spill kit nearby.

Summary

Stormwater runoff from the site was not occurring during the inspection. Also, evidence of pollutants deposited offsite were not noted.

A NOPF was provided to Mr. Stamper and Mr. Gillman during the exit meeting. The following findings were included in the NOPF (attachment 5):

1. SWPPP: not signed, no training records, SWPPP needs updating, SWPPP map does not include permit-required details.
2. Good housekeeping: bindings and wood debris on the ground, evidence of release at diesel tank, leak at truck parking areas.
3. Permit exceedances during last 3 years.
4. Site inspections were not conducted according to ISW NPDES permit 4.1, 4.2, and 4.3.

In addition to the permit limit exceedances noted as NOPF 3, exceedances also occurred in 2018 as mentioned earlier in the report.

HANNAH
LEWIS

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Attachments:

1. Industrial User Inspection Checklist (6 pages)
2. NPDES Industrial Storm Water Worksheet (6 pages)
3. Digital Photographs with Photo Log (11 pages)
4. Facility Layout with Photo Locations (1 page)
5. NOPF dated April 20, 2022 (2 pages)
6. SWPPP (37 pages)
7. Pretreatment NPDES Permit (22 pages)
8. NPDES GP for Storm Water Discharges from Industrial Activity (205 pages)
9. Sample Analysis Results for Project HML2203 (12 pages)
10. Industrial sludge manifests (6 pages)