

MULTI-SECTOR GENERAL PERMIT NON-FILER INSPECTION CHECKLIST

Inspection Date(s):	2/9/2023	
Time:	Entry: 10:50 AM	Exit: 12:20 PM
Weather Conditions:	Cloudy, 41° F	
Media/Program:	Water – CWA § 301, 402 – Industrial SW/NEC	
Operator Name:	Trenton Group, Inc.	
Facility Name:	Shrewsbury Concrete Co. Division (Shrewsbury Concrete Co.)	
Permit ID or Tracking #:	Unpermitted at the time of the inspection	
SIC Code:	3273 – Ready-Mixed Concrete The Facility representative was unsure of the Facility's SIC code. The SIC Code was determined using the EPA Enforcement and Compliance History Online (ECHO) Facility Finder.	
Facility Address:	35 Constitution Avenue	
(city, state, zip code)	Shrewsbury, PA 17361	
Geographic Coordinates:	Latitude: 39.754011°, Longitude: -76.680425°	
Mailing address:	35 Constitution Avenue	
(city, state, zip code)	Shrewsbury, PA 17361	
County:	York County	
Regular Days/Hours of Operation:	Summer, Monday – Friday, 8:00 AM – 5:00 PM Winter, Monday – Friday 7:00 – 4:00	
# of Employees at location:	5	
Size of Facility (in acres):	Approximately 3.5	
Receiving Water(s):	A direct connection was not observed due to private property restrictions	
Date facility est. @ location:	1973	
Field Representative:		
Name: Josh Fissel	Title: Manager	Phone: (717) 235-3807
	Email: jfissel@shrewsburyconcrete.com	
Authorized Official:	→ Contacted? ☒ Yes ☐ No	
Name: Josh Fissel	Title: Manager	Phone: (717) 235-3807
	Email: jfissel@shrewsburyconcrete.com	
Inspector(s):		
Page Cirillo (PG Environmental)	Title: Inspector	Phone: (720) 743-2093
Taylor Fontaine (PG Environmental)	Title: Inspector	Phone: (703) 956-1977
Heather Dock (Pennsylvania Department of Environmental Protection (PADEP))	Title: Water Quality Specialist	Phone: (717) 439-5080
Inspection Report Author:		
Name: Page Cirillo	Signature: <i>Page Cirillo</i>	Date: 3/30/2023
Supervisor Review:		
Name: Jessica Duffy	Signature:	Date:

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 and its implementing regulations found at 40 CFR Part 122.26. The inspection was unannounced and consisted of interviewing facility representatives, recording field observations, and taking photographs to document facility conditions during the inspection. Accompanying this report is Appendix A, Aerial Map and Appendix B, Photograph Log.

Opening Conference

- 1) On February 9, 2023, U.S. Environmental Protection Agency (EPA) contractor, PG Environmental, conducted an unpermitted industrial stormwater inspection at Trenton Group, Inc. Shrewsbury Concrete Co. Division (Facility) located in Shrewsbury, Pennsylvania. Page Cirillo and Taylor Fontaine of PG Environmental (collectively, the EPA Inspection Team) were accompanied on the inspection by Heather Dock of PADEP. Taylor Fontaine presented his Clean Water Act inspector credential to the Facility representative and conducted an opening conference. The EPA Inspection Team explained the purpose of the inspection was to assess the Facility's compliance status with respect to the PAG-03 National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Stormwater Associated with Industrial Activity (Permit). At the time of the inspection, the Facility did not have coverage under the Permit.

Weather conditions at the time of the inspection were cloudy (no precipitation) with temperatures of approximately 41° F. There was no recent precipitation data available from the National Oceanic and Atmospheric Administration (NOAA) for Shrewsbury, Pennsylvania. According to precipitation data from Weather Underground¹, Harrisburg International Airport received 0.01 inches of precipitation at 8:00 AM the day of the inspection and no precipitation the day before.

- 2) Credentials presented to: Josh Fissel
- 3) Facility acknowledged receiving previous outreach materials or correspondence on Permit requirements? ☐ Yes ☒ No Describe: The Facility representative, Josh Fissel, stated the Facility has not received outreach materials or correspondence on Permit requirements.
- 4) Facility has been individually notified by permit authority or EPA that it is subject to stormwater requirements? ☐ Yes ☒ No

¹ Source: Weather Underground (<https://www.wunderground.com/>).

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Trenton Group, Inc. Shrewsbury Concrete Co.

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FACILITY'S OPERATION & PRODUCT DESCRIPTION

The Facility is approximately 3.5 acres, and industrial activities consist of aggregate storage, concrete mixing, and concrete reclaiming. The Facility includes a building on the north side of the property, which operates as the main office, and a building on the south side of the property, which houses the concrete reclaimer. A ready-mixed concrete mixer is stored outside at the center of the Facility. Industrial activities (e.g., production of ready-mixed concrete) were observed to occur outside and were exposed to stormwater.

The 3273 SIC code for Ready-Mixed Concrete, was determined using the EPA ECHO Facility Finder.

Other industrial facilities owned/operated by same business entity? ☒ Yes ☐ No

The Trenton Group, Inc. has additional businesses and facilities including Hanover Concrete Co. and Gettysburg Concrete Co.

SECTION II – OBSERVATIONS

FACILITY OBSERVATIONS

Pollutant Sources	Observations
Loading/Unloading Operations	The EPA Inspection Team observed loading activities during the inspection, which consisted of concrete mixing trucks entering the Facility from Constitution Avenue, receiving concrete from the ready-mixed concrete mixer, and exiting the Facility using Constitution Avenue. The Facility representative indicated that aggregate deliveries enter at from Constitution Avenue as well.
Industrial Manufacturing/ Processing Operations	The Facility's ready-mixed concrete mixer was located in the center of the Facility (refer to Appendix B, Photograph DSCN5559). The Facility representative stated that most of the water used in industrial processes is recycled via a concrete reclaimer, which is located in a building on the south side of the property (refer to Appendix B, Photograph DSCN5595). The Facility representative indicated that water from the concrete reclaimer exits the building into an open-top holding tank located adjacent to the concrete reclaimer building, which was observed during the inspection. During the inspection, water was observed discharging from the concrete reclaimer building into the holding tank. The holding tank was outside and exposed to stormwater (refer to Appendix B, Photographs DSCN5595 -DSCN5596, DSCN1495 - DSCN1496 & DSCN5601).
Industrial Machinery & Equipment Storage	None observed.
Storage of Industrial Materials or Products	The Facility had aggregate stockpiles in bins on impervious paved ground with and without cover on the east and west sides of the Facility (refer to Appendix B, Photographs DSCN1486 - DSCN1487, DSCN5584, DSCN5586, & DSCN5614 - DSCN5616).
Liquid Storage (e.g., Tanks, Liquid Storage Drums)	The EPA Inspection Team observed the following petroleum product storage tanks within secondary containment structures: Approximately 500-gallon heating oil storage tank on the east side of the main office building (refer to Appendix B, Photographs DSCN5554 - DSCN5556). The secondary containment structure was cracked (refer to Appendix B, Photographs DSCN5554 & DSCN5555).

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FACILITY OBSERVATIONS	
Pollutant Sources	Observations
	- Approximately 300-gallon ultra-low sulfur diesel tank (ULSD) south of the Facility's main office building (refer to Appendix B, Photographs DSCN1474 & DSCN5560 - DSCN5561). - Approximately 750-gallon tank of ULSD north of the ready-mixed concrete mixer at center of Facility (refer to Appendix B, Photographs DSCN1474, & DSCN5565 - DSCN5567). - Approximately 650-gallon kerosene storage tank north of the ready-mixed concrete mixer (refer to Appendix B, Photographs DSCN5559, DSCN5565, & DSCN5567). - Approximately 300-gallon heating oil storage tank north of the ready-mixed concrete mixer (refer to Appendix B, Photographs DSCN5559, DSCN5565, DSCN5568, DSCN1476, & DSCN5571). The EPA Inspection Team observed a drain in the bottom of the secondary containment structure wall (refer to Appendix B, Photographs DSCN1476 & DSCN5571). - Approximately 500-gallon heating oil storage tank south of the concrete reclaimer building (refer to Appendix B, Photographs DSCN1492 - DSCN1493 & DSCN5599 - DSCN5600). The EPA Inspection Team observed a drain in the bottom of the secondary containment wall (refer to Appendix B, Photograph DSCN1494). There is evidence of stormwater flow near this drain along with sediment accumulation.
Waste Storage/Disposal Areas (solid and/or hazardous)	The EPA Inspection Team observed one (1) small, covered dumpster located north of ready-mixed concrete mixer (refer to Appendix B, Photograph DSCN1475).
Waste Treatment Facilities (e.g., Pretreatment Systems)	The EPA Inspection Team observed an open-top holding tank intended to settle out concrete adjacent to the concrete reclaiming building (refer to Appendix B, Photographs DSCN5595 - DSCN5596, DSCN1495 - DSCN1496, & DSCN5601).
Fueling Stations/Equipment Maintenance Areas & Cleaning Areas	See Liquid Storage section for all petroleum product storage at the Facility.
Sediment & Erosion Controls	The Facility has one (1) stormwater retention basin in the southwest area of the Facility property, which is a stormwater best management practice (BMP) that can also provide sediment and erosion control through capture of sediment and reduction of stormwater velocities during a precipitation event. The basin discharges through a pipe outlet to a pervious drainage channel which flows southwest along the Facility property line, and then connects to the holding tank discharge flow pathway. Discharge water from the basin and the holding tank combines and flows to a low point in the southwest corner along the Facility property line and discharges to a swale located on the adjacent property to the west of the Facility (refer to Appendix B, Photographs DSCN1488, DSCN5587, DSCN5589, DSCN5602 - DSCN5605, DSCN5607, & DSCN5609 - DSCN5612). Erosion was observed in the drainage area that flows to the basin (refer to Appendix B, Photographs DSCN1490, DSCN5590 - DSCN5591). Broken concrete and a gravel pile was observed adjacent to the basin, and aggregate and sediment was observed accumulated in the bottom of the basin and in the basin outlet drainage channel (refer to Appendix B, Photographs DSCN1488, DSCN5587, DSCN5589, DSCN5602 - DSCN5603, DSCN5605, DSCN5607, & DSCN5609 - DSCN5612).

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FACILITY OBSERVATIONS	
Pollutant Sources	Observations
Spills/Leaks Handling	The EPA Inspection Team did not observe spill kits or other spills/leaks handling supplies at the Facility. The EPA Inspection Team observed petroleum product staining on the impervious surface where concrete mixing trucks are loaded at the ready-mixed concrete mixer at the center of the Facility. This area was uncovered and exposed to stormwater (refer to <u>Appendix B, Photograph DSCN5617</u>).
Outside Shelters	☐ Temporary (Date Established _____) ☐ Permanent The EPA Inspection Team observed one (1) shed west of the Facility's main office with a sign reading "Danger, Acid" used to store hazardous chemicals (refer to <u>Appendix B, Photograph DSCN5564</u>).
Evidence of non-stormwater sources/discharges (allowable if permitted under MSGP)?	The EPA Inspection Team observed vehicle sediment tracking at the Facility entrance (refer to <u>Appendix B, Photographs DSCN5586 & DSCN5593</u>).
Evidence of process wastewater sources/discharges?	During the inspection, the EPA Inspection Team observed a whitish-colored water (presumably containing concrete or concrete residual) discharging from the concrete reclaimer holding tank through a drain in the bottom of the tank (refer to <u>Appendix B, Photographs DSCN5602 - DSCN5603 & DSCN5605 - DSCN5609</u>). The Facility representative indicated the drain is controlled by a valve that the Facility leaves open to regulate holding tank water levels. The discharge pathway from the holding tank flows across the ground surface and connects to the detention basin outlet pervious drainage channel. The discharge flow pathways from the detention basin and the holding tank combine at a low point in the southwest corner along the Facility property line. Drainage soil patterns indicate water collecting in this low point discharges to a swale located on the adjacent property to the west of the Facility. The EPA Inspection Team observed a discoloration in the ground surface at this low point, indicating sediment accumulation and/or process water discharge (refer to <u>Appendix B, Photographs DSCN5602 - DSCN5607, & DSCN5609 - DSCN5612</u>).

OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
Number and description of each potential Stormwater Discharge Point from the Facility	The EPA Inspection Team observed at least four (4) distinct points of discharge from the Facility to the swale running along the west side of the Facility (refer to <u>Appendix A, Figure 1</u>).
Evidence of pollutants migrating off the Facility property (stains, deposits, ponding) at discharge points, into Receiving Waters or in MS4	During the inspection, the EPA Inspection Team observed a whitish-colored water (presumably containing concrete or concrete residual) discharging from the concrete reclaimer holding tank through a drain in the bottom of the tank (refer to <u>Appendix B, Photographs DSCN5602 - DSCN5603 & DSCN5605 - DSCN5609</u>). The Facility representative indicated the drain is controlled by a valve that the Facility leaves open to regulate holding tank water levels. The discharge pathway from the holding tank flows across the ground surface and connects to the detention basin outlet pervious drainage channel. The discharge flow pathways from the detention basin and the holding tank combine at a low point on the southwest corner property line. Drainage

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	soil patterns indicate water collecting in this low point discharges to a swale located on the adjacent property to the west of the Facility. The EPA Inspection Team observed a discoloration in the ground surface at this low point, indicating sediment accumulation and/or process water discharge (refer to <u>Appendix B, Photographs DSCN5602 - DSCN5603 - DSCN5607, & DSCN5609 - DSCN5612</u>). Aggregate and sediment was observed accumulated in the basin outlet drainage channel (refer to Appendix B, Photographs DSCN5602 - DSCN5603, DSCN5605, DSCN5607, & DSCN5609 - DSCN5612). The EPA Inspection Team observed concrete in the swale running along the west side of the Facility (refer to <u>Appendix B, Photographs DSCN1480 - DSCN1481</u>) adjacent to an identified discharge point (refer to <u>Appendix A, Figure 1</u>). The EPA Inspection Team observed sediment deposits in the swale running along the west side of the Facility (refer to <u>Appendix B, Photographs DSCN1482 - DSCN1483, DSCN5578 - DSCN5581</u>) adjacent to an identified discharge point (refer to <u>Appendix A, Figure 1</u>). An eroded channel was observed leading to these sediment deposits. The EPA Inspection Team observed aggregate stockpiles overflowing out of the back of storage bins onto a hill leading towards the swale running along the west side of the Facility (refer to <u>Appendix B, Photographs DSCN1484, & DSCN5582</u>) adjacent to an identified discharge point (refer to <u>Appendix A, Figure 1</u>).
Evidence of Non-stormwater Discharges leaving Facility (authorized or unauthorized)	The discharge flow pathways from the detention basin and the holding tank combine at a low point in the southwest corner along the Facility property line. Drainage soil patterns indicate water collecting in this low point discharges to a swale located on the adjacent property to the west of the Facility. The EPA Inspection Team observed a discoloration in the ground surface at this low point, indicating sediment accumulation and/or process water discharge (refer to Appendix B, Photographs DSCN5602 - DSCN5607, & DSCN5609 - DSCN5612). The EPA Inspection Team observed concrete in the swale running along the west side of the Facility (refer to Appendix B, Photographs DSCN1480 - DSCN1481) adjacent to an identified discharge point (refer to Appendix A, Figure 1). The EPA Inspection Team observed sediment deposits in the swale running along the west side of the Facility (refer to Appendix B, Photographs DSCN1482 - DSCN1483, DSCN5578 - DSCN5581) adjacent to an identified discharge point (refer to Appendix A, Figure 1). An eroded channel was observed leading to these sediment deposits. The EPA Inspection Team observed aggregate stockpiles overflowing out of the back of storage bins onto a hill leading towards the swale running along the west side of the Facility (refer to Appendix B, Photographs DSCN1484, & DSCN5582) adjacent to an identified discharge point (refer to Appendix A, Figure 1).
Description of general gradients/slopes at the Facility, all apparent discharge points, and discharge pathway from Facility to Receiving Water or MS4 (storm drains, channel, swale, ditches,	The Facility was observed to slope west towards a swale running along the west side of the Facility. Stormwater was conveyed from the east side of the Facility under the Facility's entrance and into a stormwater detention basin. The stormwater detention basin discharges to a pervious drainage channel which connects to the holding tank discharge pathway. The discharge flow pathways from the detention basin and the holding tank combine at a low point in the southwest corner along the Facility property line. Drainage soil patterns indicate water collecting in this low point

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OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS	
driveway, pipes, & etc.)	discharges to a swale located on the adjacent property to the west of the Facility. (refer to <u>Appendix B, Photographs DSCN5602 - DSCN5605, DSCN5607, & DSCN5609 - DSCN5611</u>). Stormwater in the northern half of the Facility flows towards the wall and discharges into the swale through cracks in the wall at two discharge points and at the end of the wall at the Facility's western border (refer to <u>Appendix B, Photographs DSCN1480, DSCN1482 - DSCN1483, DSCN5578 - DSCN5580, DSCN1485, & DSCN5583</u>). The EPA Inspection Team observed four (4) points of concentrated discharge from the Facility to the swale running along the west side of the Facility (refer to <u>Appendix A, Figure 1</u>). The majority of the Facility was impervious and paved. The south portion of the Facility behind the concrete recycler was pervious ground surface. The EPA Inspection Team observed areas where there's evidence water pools at the Facility's main entrance and west side of the Facility (refer to <u>Appendix B, Photographs DSCN1475, DSCN5569 - DSCN5571, DSCN1477, DSCN5572, & DSCN5574</u>). Facility personnel were actively washing off a concrete truck in this area during the inspection. (refer to Appendix B, Photograph DSCN5592 & DSCN5594).

SECTION III – AREAS OF CONCERN

- 1) The EPA Inspection Team observed the production and recycling of ready-mixed concrete at the Facility, an industrial activity classified under SIC Code 3273 – Ready-Mixed Concrete
 - a. Businesses classified under SIC Code 3273 are regulated under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.
 - b. Industrial activities observed occurring outside and exposed to stormwater at the time of the inspection included the production of ready-mixed concrete, storage of wastewater from the concrete recycler, and aggregate storage.
 - c. The Facility did not have coverage under the Permit at the time of the inspection.
- 2) Erosion was observed in the drainage area that flows to the stormwater detention basin (refer to Appendix B, Photographs DSCN1490, DSCN5590 - DSCN5591). Broken concrete and a gravel pile was observed adjacent to the basin, and aggregate and sediment was observed accumulated in the bottom of the basin and in the basin outlet drainage channel (refer to Appendix B, Photographs DSCN1488, DSCN5587, DSCN5589, DSCN5602 - DSCN5603, DSCN5605, DSCN5607, & DSCN5609 - DSCN5612).
- 3) The EPA Inspection Team observed a crack in the secondary containment structure for the approximately 500-gallon heating oil storage tank located on the east side of the main office building (refer to Appendix B, Photographs DSCN5554 - DSCN5556).
- 4) The EPA Inspection Team observed petroleum product staining on an impervious surface exposed to stormwater where concrete mixing trucks are loaded at the ready-mixed concrete mixer at the center of the Facility (refer to Appendix B, Photograph DSCN5617).

- 5) The EPA Inspection Team observed vehicle sediment tracking at the Facility entrance (refer to Appendix B, Photographs DSCN5586 & DSCN5593).
- 6) During the inspection, the EPA Inspection Team observed a whitish-colored water (presumably containing concrete or concrete residual) discharging from the concrete reclaiming holding tank through a drain in the bottom of the tank (refer to Appendix B, Photographs DSCN5602 - DSCN5603 & DSCN5605 - DSCN5609). The Facility representative indicated the drain is controlled by a valve that the Facility leaves open to regulate holding tank water levels. The discharge pathway from the holding tank flows across the ground surface and connects to the detention basin outlet pervious drainage channel. The discharge flow pathways from the detention basin and the holding tank combine at a low point in the southwest corner along the Facility property line. Drainage soil patterns indicate water collecting in this low point discharges to a swale located on the adjacent property to the west of the Facility. The EPA Inspection Team observed a discoloration in the ground surface at this low point, indicating sediment accumulation and/or process water discharge (refer to Appendix B, Photographs DSCN5602 - DSCN5607, & DSCN5609 - DSCN5612).
- 7) The EPA Inspection Team observed concrete in the swale running along the west side of the Facility (refer to Appendix B, Photographs DSCN1480 & DSCN1481) adjacent to an identified discharge point (refer to Appendix A, Figure 1).
- 8) The EPA Inspection Team observed sediment deposits in the swale running along the west side of the Facility (refer to Appendix B, Photographs DSCN1482 - DSCN1483, DSCN5578 - DSCN5581) adjacent to an identified discharge point (refer to Appendix A, Figure 1). An eroded channel was observed leading to these sediment deposits.
- 9) The EPA Inspection Team observed aggregate stockpiles overflowing out of the back of storage bins onto a hill leading towards the swale running along the west side of the Facility (refer to Appendix B, Photographs DSCN1484, & DSCN5582) adjacent to an identified discharge point (refer to Appendix A, Figure 1).

SECTION IV – CLOSING CONFERENCE

After the Facility walk, the EPA Inspection Team met with the Facility representative from Trenton Group, Inc. (Shrewsbury Concrete Co. Division) for a closing conference and shared preliminary observations. The EPA Inspection Team reiterated that all preliminary observations discussed were not compliance determinations. Any and all preliminary observations shared were subject to further investigation by the EPA Inspection Team. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference.

The inspection concluded at approximately 12:20 PM (EST).

SECTION V – LIST OF APPENDICES

Appendix A – Aerial Map

Appendix B – Photograph Log