



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

ENFORCEMENT &
COMPLIANCE ASSURANCE
DIVISION

SUBJECT: CLEAN WATER ACT INSPECTION REPORT
Anchorage Sand & Gravel Co., Inc. – Klatt Road Facility, Anchorage, Alaska

PREPARED BY: Tara Martich, CWA Enforcement Specialist
Water Enforcement & Field Branch, Surface Water Enforcement Section

SIGNATURES: Lead Inspector

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ANN MARTICH
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Supervisor

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BASIC INFORMATION

Facility Name: Anchorage Sand & Gravel Co., Inc. – Klatt Road Facility

Facility Location: 11195 Lang St, Anchorage, Alaska 99515

Office Location: 1040 O'Malley Rd, Anchorage, Alaska 99515

NPDES ID: AKR06AB65

Date of Inspection: Wednesday, September 14, 2022

Lead Inspector: Tara Martich, CWA Enforcement Specialist

Other Attendees:

1. Mickey Regan Jencius, EPA
2. Kris Shippen, Environmental Manager, Anchorage Sand & Gravel Co., Inc.

Purpose of Inspection: Stormwater inspection

Facility Type: Sand and gravel processing

Regulations Central to Inspection: National Pollutant Discharge Elimination System (NPDES)

Arrival Time: 11:30 AM
Departure Time: 2:20 PM

Inspection Type:

- ☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
☒ CBI warning to facility provided

The information in this section was obtained verbally from Kris Shippen unless otherwise noted. The opening conference was held in a conference room at Anchorage Sand & Gravel Co., Inc. (AS&G) office. The office is located a few blocks east of the Klatt Road Facility (“facility”).

Process Description:

AS&G brings sand and gravel to the Klatt Road Facility, where it is then crushed, washed and/or screened and distributed into stockpiles. Some materials are further processed at the concrete ready-mix plant or at the block plant. Materials leave the site as final sand and gravel products.

Piping around the facility collects stormwater and brings it to a settling pond. If the settling pond overflows, then the discharge is directed, via an underground pipe, to the Municipality of Anchorage storm sewer system.

AS&G displays a large aerial photograph of the Klatt Road Facility in its conference room. EPA asked about operations visible in the aerial photograph but excluded from the Klatt Road Facility SWPPP map. EPA identified three additional areas that are part of the Klatt Road Facility operations: 1) Precast Area, 2) Building Materials, and 3) Storage. AS&G shared that it specifically excluded Building Materials from the Klatt Road Facility SWPPP because of Building Materials’ SIC number.



Figure 1: Areas covered by 2020 SWPPP



Figure 2: Aerial of Klatt Road Facility. Precast Area, Building Materials & Storage are owned/operated by AS&G.

Other Information:

AS&G updated its SWPPP in 2020.

A water truck is used for dust suppression, as needed. The crusher foreman typically directs the water truck, but any shop or employee can request the water truck. Once per week, a sweeper truck sweeps the facility. In between sweeper truck visits, brooms can be used to sweep. Broom-sweeping is directed by a foreman.

The Environmental compliance team includes Kris Shippen and PJ Larsen (Lead Foreman).

Discharges. According to Kris Shippen, the facility has not discharged effluent since at least 2019, when Kris Shippen began his employment with AS&G.

Training. Annually, Kris Shippen provides SWPPP training to the facility foreman. The facility has foremen at the crusher, cement terminal, sacking, block plant, precast, batch plant and recycle crusher.

Routine Visual Monitoring. Kris Shippen conducts routine visual monitoring, which he does not document. During the routine monitoring, Kris uses a pH pen meter to determine pH of the pond. Whenever Kris observes track-out, he requests the sweeper truck, as well as the water truck for dust control.

Quarterly SWPPP Inspections. Kris Shippen and/or PJ Larsen conduct quarterly SWPPP inspections. They try to conduct these inspections during rain events.

RECORDS REVIEW

EPA reviewed and/or attempted to review the following inspection reports onsite.

Quarterly SWPPP Inspections

- 2nd quarter 2022 – conducted by PJ Larsen on 6/28/2022 during clear conditions.

- 1st quarter 2022 – conducted by Kris Shippen on 3/18/2022 during clear conditions. This inspection report was not available for review at the time of inspection. AS&G provided a copy after the inspection via email.
- 4th quarter 2021 – conducted by PJ Larsen on 9/30/2021 during clear conditions. This inspection was conducted before October 1, e.g., before the 4th quarter.
- 3rd quarter 2021 – conducted by PJ Larsen on 6/30/2021 during clear conditions.
- 2nd quarter 2021 – conducted by PJ Larsen on 4/20/2021 during clear conditions.
- 1st quarter 2021 – conducted by Kris Shippen on 3/26/2021 during clear conditions. The SWPPP inspection was not dated in the annual certification.
- 4th quarter 2020 –conducted by Kris Shippen on 11/14/2020 during snowy conditions.
- 3rd quarter 2020 – conducted on by Kris Shippen on 9/8/2020 during cloudy conditions.
- 2nd quarter 2020 – conducted by PJ Larsen on 5/1/2020 during cloudy conditions.
- 1st quarter 2020 – conducted by Kris Shippen on 3/20/2020 during raining/sleeting conditions.

Observation. Although, Kris Shippen told EPA that AS&G attempted to conduct its quarterly SWPPP inspections on rainy days, only 1 of the 10 the quarterly SWPPP inspections was conducted on a rainy day.

Annual Reports

- 2021 Annual Report. The MSGP Annual Reporting Form was submitted to the Alaska Department of Environmental Conservation on 2/8/2022 and based upon an inspection conducted by Kris Shippen on 9/30/2021.
- 2020 Annual Report. The MSGP Annual Reporting Form was submitted to the Alaska Department of Environmental Conservation on 2/4/2021 and based upon an inspection conducted by Kris Shippen on 10/17/2020.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

During the tour, the sun shined, and no clouds were visible. It was a clear day. A water truck actively watered facility surfaces.

EPA walked the facility starting in the southwest corner, at Building Materials. EPA could not distinguish a line of demarcation between the *SIC-excluded Building Materials* and the portion of the facility covered by the SWPPP. Materials stored along the eastern border of the facility, which belonged to operations covered by the SWPPP, were located within both the SIC excluded area and SWPPP covered areas. When EPA asked AS&G about exactly where the SWPPP coverage began and ended by

pointing to materials stored along the eastern border, AS&G was not able to clearly articulate a boundary between its Block Storage Yard and Building Materials.

Walking north, we saw the Block Storage Yard and the Block Plant. We saw the salt pile, which was covered with a tarp. We then walked to the main sand and gravel processing area and towards the pond. We saw the facility entrance, which slopes towards Walter J. Hickel Parkway.

We walked along an internal facility road that borders the northern edge of the property. Along that roadway, we could see a cut in the bank where stormwater had recently discharged. There was very wet mud in the cut.

EPA looked at where the cut flowed to. We could see leaves and grass covered with mud and a path to where the muddy discharge flowed. A large deposit of sediment sat at the bottom of the path. Some young grasses grew on the sediment, indicating the that the sediment pile had grown over time. The



Figure 3: Facility Road Along Northern Boundary with Cut



Figure 4: View of Cut from Northern Side of Fence



Figure 5: Path of Discharge through Cut, Muddy Grass/Leaves



Figure 7: Path from Cut & Sediment Deposit



Figure 6: Sediment Deposit and Curb

northernmost face of the pile dropped at an almost 90-degree angle to the curb. The curb, next to the deposit, appeared well-maintained. A storm drain inlet is located a few feet east of the sediment pile.

Next, we looked at the onsite pond and its discharge overflow pipe. When we arrived at the discharge overflow pipe, it was actively discharging. Debris on the grate above the overflow-pipe indicated the water was higher than the grate at some point.

Kris Shippen commented that he was surprised to see the pond discharging and then further commented that the discharging was new. We pointed out to Kris Shippen the mudline on the vegetation around the pond. The mudline was more than a foot above the current pond level. We told AS&G the mudline indicated the pond had been discharging for some time. Kris appeared to understand. He said he would pull a sample of the discharge.



Figure 8: Overflow Pipe Discharging



Figure 9: Mudline at Pond

Just west of the pond, at AS&G's Klatt Road Facility, is Granite Construction's operation. The operation appeared to mainly be a hot mix asphalt plant. However, it also appeared to have access to and use AS&G's stockpiles. To anyone unfamiliar with the site, Granite's operation appears to be part of AS&G's Klatt Road Facility. Again, like with Building Materials, it was difficult to tell where one operation ends and the other begins.

Lang Street, a municipal street, runs through the middle of AS&G's operation. West of Lang Street AS&G crushes and stockpiles reclaimed asphalt pavement and other materials. When we walked across Lang Street, we observed discharges entering the storm drains on both the northeast and northwest corners of Lang Street and Hickel Parkway.

Turbid waters sheet-flowed across the surface of the reclaimed asphalt pavement crushing operation. No BMPs were present to filter the sheet flow from the reclaimed asphalt paving area before it entered



Figure 10: Granite Construction / Reclaimed Asphalt Crushing & Stockpiles



Figure 11: Discharge into Storm Drain at NE Corner of Lang Street & Gilman Parkway

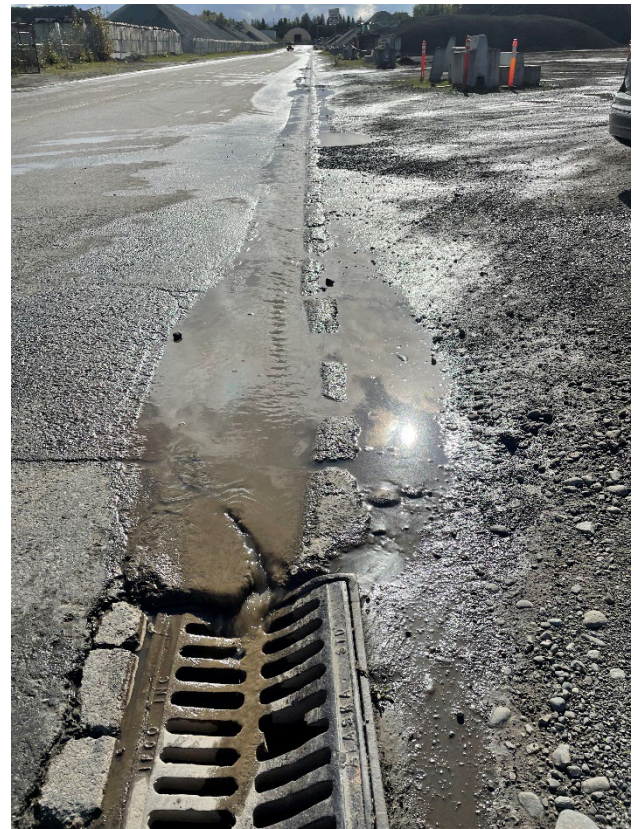


Figure 12: Discharge into Storm Drain at Reclaimed Asphalt Recycling (NW corner of Lang Street and Gilman Parkway)

into the gutter on Lang Street, and then into the storm drain. We pointed the turbid discharge out to Kris Shippen. Kris commented he would need to figure out how to collect a sample and mentioned he believed the water could include contaminants from properties upstream. We followed the water flow. Upstream properties were not discharging. We also told Kris, if/when AS&G's upstream neighbor(s)' discharged, Kris could collect a sample of that (before it came into contact with AS&G's discharge) to establish a baseline.

During the site walk, we noted several drums, and other materials stored in areas that did not include spill containment and/or located in areas where water flowed towards the onsite ponds.

Field Measurements: were not taken during this inspection.

CLOSING CONFERENCE

Concerns:

- 1) Notion the facility has not discharged since 2019, even though it was actively discharging on the day of the inspection;
- 2) no history of sampling of discharges (During the inspection on a clear/non-rainy day, EPA found the pond directly discharging to municipal storm system and noted discharges from site entering into storm drains);
- 3) excluding the precast area, storage area and building materials area from the SWPPP; and
- 4) lack of records for pH measurement of the pond.

Requested documents:

- 2020 SWPPP
- Quarterly Reports Q1 2020 – Q3 2022
- Results of Discharge Sampling

Facility Name: Anchorage Sand & Gravel

Facility Location: 11195 Lang St, Anchorage, Alaska 99515

Date of Inspection: September 14, 2022

APPENDIX 1 – PHOTO LOG

Facility Name: Anchorage Sand & Gravel
Facility Location: 11195 Lang St, Anchorage, Alaska 99515
Date of Inspection: September 14, 2022

Storm Water Pollution Prevention Plan (SWPPP)
AS&G Klatt Road Facility, May 16, 2020 – Permit #AKR06AB65

- Date of evaluation: May 11, 2020
- Description of the evaluation criteria used:
Kris Shippen an employee of AS&G, an AKCESCL certified and competent person for this evaluation examined all operations under this permit using the guidance documents from the ADEC, EPA, and industry text; as well as, this APDES General Permit.
- List of the outfalls or onsite drainage points that were directly observed during the evaluation:
There are not any non-storm water discharges identified at this site due to the covered activities.
- Different types of non-storm water discharge(s) and source locations:
During Spring break up, groundwater becomes elevated and infiltrates into the aggregate terminal. This area is designed for human occupancy; therefore, this groundwater is allowed to be pumped out per Condition 1.2.3 of this permit and per Municipality of Anchorage Handout AG.20
- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified. For example, a floor drain was sealed, a sink drain was re-routed to sanitary, or an APDES permit application was submitted for an unauthorized cooling water discharge:
No unauthorized discharges are known to exist for this facility.

2.4 Salt Storage

- Salt is stored on an intermittent basis for winter sand manufacturing production only. Salt is stored on a concrete pad and covered. See Attachment B.

2.5 Sampling Data Summary

- No measurable point source outfalls exist in the current facility design, including the period of time during the previous permit coverage. AS&G retains MSGP Coverage because we manage trackout into MS4 regulated areas.

DEC Industrial SWPPP Template,
January 30, 2020

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Anchorage Sand & Gravel FACILITY PERMIT TRACKING NUMBER: AKR06AB65
Additional MSGP Documentation

Storm water Industrial Routine Facility Inspection Report

General Information	
Facility Name	AS&G KLATT ROAD FACILITY
NPDES Tracking No.	AKR06AB65
Date of Inspection	9/30/21
Inspector's Name(s)	P.J. Larson
Inspector's Title(s)	Supervisor
Inspector's Contact Information	907-348-6708
Inspector's Qualifications	Supervisor, competent person

Weather Information	
Weather at time of this inspection?	
☒ Clear	☐ Cloudy
☐ Rain	☐ Sleet
☐ Fog	☐ Snow
☐ High Winds	Temperature:

Have any previously unidentified discharges of pollutants occurred since the last inspection? ☐ Yes ☒ No
If yes, describe:

Are there any discharges occurring at the time of inspection? ☐ Yes ☒ No
If yes, describe:

Control Measures

- Number the structural storm water control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.
- Describe the corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.

CRUSHER:

Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
1 Aggregate stockpiles contained to designed areas	☒ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
2 Asphalt roadway	☒ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
3 Swale in roadway leading north	☒ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
4 Aggregate process water conveyances and containments	☒ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
5 Redi-mix truck rinse water conveyances and containments	☒ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	

Picture 1: 2020 SWPPP indicates no non-stormwater discharges

Picture 2: September 30, 2021, Inspection conducted by P.J. Larson

Facility Name: Anchorage Sand & Gravel
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Permit Tracking #: AKR06AB65 For Agency Use

Alaska Department of Environmental Conservation
MSGP Annual Reporting Form

Section I. General Information

Facility Name		APDES Permit Tracking Number	
AS&G Klatt Road Facility		AKR06AB65	
Facility Physical Address		State	
Street	City	Alaska	Zip Code
1040 O'Malley Rd	Anchorage		99515
Contact Person	Title	Phone	Email
Kris Shippen	Environmental Coordinator	907-348-6700	kris.shippen@anchsand.com
Lead Inspector's Name	Additional Inspector's Name	Inspection Date	
Kris Shippen		09/30/2021	

Section II. General Inspection Findings

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to storm water? ☒ Yes ☐ No
 If NO, describe why not:

Note: Complete Section III of this form for each industrial activity area inspected and included in your SWPPP or as newly defined, in Section II parts 2 and 3 below, where pollutants may be exposed to storm water.

2. Did this inspection identify any storm water or non-storm water outfalls not previously identified in your SWPPP? ☐ Yes ☒ No
 If YES, for each location, describe the sources of those storm water and non-storm water discharges and any associated control measures in place:

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Picture 3: September 30, 2021, Annual Report indicates inspection conducted by Kris Shippen

Picture 4: Material Storage excluded from 2020 SWPPP

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Picture 5: Materials Stored at Building Materials and Excluded from SWPPP



Picture 6: Evidence of Onsite Erosion

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Picture 7: Chevron Meropa 150



Picture 8: Anchorage Sand & Gravel Pond and Ready Mix Truck at Granite Construction Ready Mix Plant

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Picture 9: Location of Discharge North of Pond



Picture 10: Gravel Installation

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Picture 11: Gravel Installation



Picture 12: Onsite Pond Mudline and Buried Pipe

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Picture 13: Material Stored in the Water Flow Path to Pond



Picture 14: Stormwater Control

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Picture 15: Stormwater Control



Picture 16: Sheet Flow from Recycle Asphalt Paving (RAP) Processing Area

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Picture 17: Discharge from RAP Processing Area



Picture 18: Discharge from RAP Processing Area

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Picture 19: Discharge from RAP Processing Area



Picture 20: Discharge from RAP Processing Area

Facility Name: Anchorage Sand & Gravel
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Picture 21: Discharge from RAP Processing Area



Picture 22: Ponding and Sheet Flow from RAP Processing Area

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Picture 23: Ponding and Sheet Flow from RAP Processing Area



Picture 24: Precast Area and Materials Stored Outside

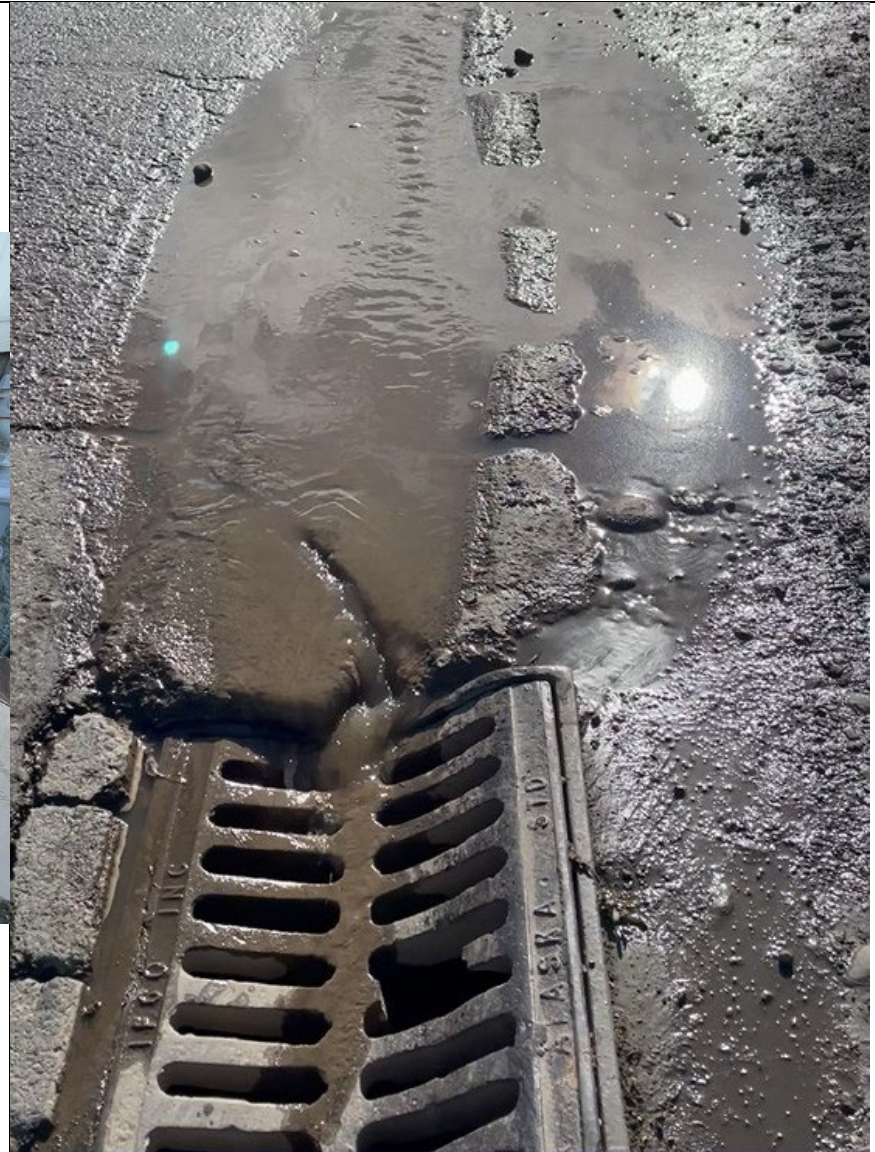
Facility Name: Anchorage Sand & Gravel

Facility Location: 11195 Lang St, Anchorage, Alaska 99515

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Picture 25: Precast Area and Materials Stored Outside



Picture 26: Discharge at NW Corner of Lang and Gilman

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Picture 27: Discharge at NE Corner of Lang St. and Gilman Pkwy.



Picture 28: Apparent Removal of Mud from Discharge Location along Northern Facility Road

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Picture 29: Discharge along Northern Facility Road



Picture 30: Storm Drain in Gilman Pkwy Gutter

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Picture 31: Discharge and Sediment from Northern Facility Road



Picture 32: Buildup of Sediment from Discharge along Northern Facility Road

Facility Name: Anchorage Sand & Gravel

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Picture 33: Sediment and Sediment Path from Discharge along Northern Facility Road



Picture 34: Storm Drain in Gilman Pkwy

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Picture 35: Discharge from AS&G into Storm Drain in Gilman Pkwy.



Picture 36: Sediment and Cobble Deposited from the Discharge along Northern Facility Road