

INSPECTION REPORT

Inspection Entry Date/Time	02/16/2023 09:08 AM (PT)	Announced: No	
Inspection Exit Date/Time	02/16/2023 11:00 AM (PT)	Access: Granted	
Weather	Sunny, 45°F		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, Industrial		
Type of Inspection	Industrial Stormwater Inspection		
Permittee Name	Interstate Concrete and Asphalt		
Facility or Site Name	Interstate Concrete and Asphalt – Richland Facility		
Facility/Site Physical Address	2505 Robertson Drive		
City, State, Zip Code	Richland, WA 99352		
County/Borough/Parish	Benton County		
Facility GPS Coordinates	46.321889, -119.288002		
Mailing Address	P.O. Box 3366		
City, State, Zip Code	Spokane, Washington 99220-3366		
FRS ID	ORT9663738365		
Permit Number	WAG505182		
NAICS	212321 - Construction Sand and Gravel Mining 327320 - Ready-Mix Concrete Manufacturing 327390 - Other Concrete Product Manufacturing		
Lead Inspector:			
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

I arrived at the Interstate Concrete and Asphalt – Richland site (the “Site” or “Facility”) for an unannounced inspection. I presented my inspector credentials to Jana McDonald and informed her I was there to determine compliance with the Clean Water Act (CWA) and the Washington Department of Ecology’s (WDOE) Sand and Gravel General Permit. This report is based on information and documentation supplied by Interstate Concrete and Asphalt and direct observations made during the inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees:

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
CRH Americas Materials, Inc.	Jana McDonald	Environmental Manager	Yes	No
CRH Americas Materials, Inc	Kelby Johnson	Ready Mix General Manager	Yes	No
CRH Americas Materials, Inc	Jimmie Roper	Ready Mix Site Superintendent	Yes	No

Site Information:

Responsible Official	Mike McBreen, Vice President, michael.mcBreen@na.crh.com
What is the principal product generated?	The principal product produced is concrete.
Type of Operation	The raw material, i.e., sand and gravel, required to produce concrete is quarried on-site. The quarried materials are then sent to the Wash Plant to be separated into its different components. Most of the quarried material is used as inputs to make concrete but some is sold on the retail market. Concrete produced at the facility is primarily sold on the retail market; however, some is made into other products such as ecology blocks.
Size of Facility	227 acres
Outfalls?	No outfalls are identified in the Site Management Plan (SMP) or Site map; however, there is an outfall identified as 001 in the Notice of Intent for permit coverage renewal dated September 29, 2020.
Parameters monitored?	The facility is only required to monitor pH, which is monitored in-house. The pH meter is calibrated prior to each use and the calibration buffer solutions are within their expiration dates.

SECTION II – OBSERVATIONS

We walked the production portion first, and then drove to the back of the property where sand and gravel quarrying operations occurred (**Photos 1 & 2**) as needed to acquire more raw materials for production. At the time of my visit to the quarry area, minimal activity was on-going.



Photo 1/P1010587 – Quarry Area, facing north



Photo 2/P1010588 – Quarry Side Wall, facing east

In the production area, there were gravel and sand piles located around the site. The topography of the site appeared to be graded slightly down towards the north (**Photo 3**). On the northern perimeter of the property is a berm that helps keep any stormwater on-site (**Photo 4**). The northern perimeter berm is a remnant from when the front area was quarried.



Photo 3/P1010578 – Gravel Piles, site graded down to north



Photo 4/P1010580 – Gravel Piles, berm to north

As I stated in “Site Information” above, the quarried material is sent to a Wash Plant. The Wash Plant discharges wastewater into a gulley where it infiltrates (**Photos 5 – 7**).



Photo 5/P1010581 – Discharge from Wash Plant, photo 1





Photo 7/P1010583 – Discharge from Wash Plant, photo 3

The site also maintains a truck washing area (**Photo 8**). The trucks pull into chutes which are part of a closed loop water recycling system. The water used to wash the trucks runs to the rear of the chute and enters a concrete pond that collects the water (**Photo 9**). Water enters the pond from the washing chutes via pass-through holes at the bottom of the diving wall.



Photo 8/P1010585 – Truck Wash Area



Photo 9/P1010586 – Concrete Pond

The facility tries to capture and reuse as much water as possible. All captured water is carried by underground piping that surfaces at the site's concrete reclamation settling pond (**Photo 10**). The sediment settles out and the water is siphoned out for reuse. The settling ponds are cleaned of sediment as needed.



Photo 10/ P1010586 – Concrete Reclamation Water Settling Pond

SECTION III – RECORDS REVIEW

I reviewed the following documents:

- Notice of Intent (Renewal) – dated September 29, 2020
- Site Management Plan (SMP) – dated October 15, 2018
- SMP Site Map – dated 2018
- Discharge Monitoring Reports (DMRs) – February 2022 through January 2023
- EPA’s Integrated Compliance Information System – January 1, 2018 through February 28, 2023

SECTION IV - AREA OF CONCERN

AOC Reference #: RA1-RR-001	Records Review: Facility Map
Regulation and/or Permit Requirement	
S5.D.2.b of the Permit states, the site map must “show the drainage area for each point.”	
AOC:	
The Richland site map did not show the drainage area for each monitoring point.	

AOC Reference #: RA1-RR-002	Records Review: Facility Map
Regulation and/or Permit Requirement	
S5.D.2.d of the Permit states, the site map must “label whether the discharge is to surface water or groundwater.”	
AOC:	
The Richland site map did not label if stormwater discharges to surface water or groundwater.	

AOC Reference #: RA1-RR-004	Records Review: Other - Site Management Plan
Regulation and/or Permit Requirement	
S5.D.2.a of the Permit states, in part, the site map must “assign a unique identifier up to four characters (e.g. S001, S002, etc.) to each outfall and monitoring point.”	
AOC:	
The Site Management Plan (SMP), dated October 15, 2018, identifies two stormwater sample location, i.e., monitoring points, labeled SW1 and SW2. The SMP does not indicate a discharge point or outfall. The Notice of Intent (NOI) renewal application lists four monitoring points, i.e., sampling locations, labeled MP2 - MP5. The NOI identifies a single outfall as 001. The facility site map shows four monitoring points, labeled MP1 - MP4. The site map does not show a discharge point.	

SECTION V – CLOSING CONFERENCE

I conducted a closing conference with facility personnel. During the closing conference, I discussed observations made during the inspection. I informed the attendees my observations and Areas of Concern have not been evaluated for a formal compliance determination.

SECTION VI – LIST OF APPENDICES

1. Photo Log

APPENDIX 1: PHOTO LOG

P1010578 – Gravel Piles, site graded down to north
P1010579 – Gravel Piles, berm to north, in distance
P1010580 – Gravel Piles, berm to north, close-up
P1010581 – Discharge from Wash Plant, photo 1
P1010582 – Discharge from Wash Plant, photo 2
P1010583 – Discharge from Wash Plant, photo 3
P1010584 – Concrete Pond
P1010585 – Truck Wash Area
P1010586 – Concrete Reclamation Water Settling Pond
P1010587 – Quarry Area, facing north
P1010588 – Quarry Side Wall, facing east