

INSPECTION REPORT

Inspection Entry Date/Time	06/06/2024 09:00 AM (PT)	Announced: Yes	
Inspection Exit Date/Time	06/06/2024 12:10 PM (PT)	Access: Granted	
Weather	55°F, Overcast		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial		
Type of Inspection	Compliance Evaluation Inspection		
Permittee Name	Brian Maller		
Site Name	Ketchikan Ready Mix Quarry		
Site Physical Address	4418 N Tongass Hwy		
City, State, Zip Code	Ketchikan, Alaska 99901		
County/Borough/Parish	Ketchikan Gateway		
Facility GPS Coordinates	55.361882, -131.704488		
Mailing Address	P.O. Box 99801		
City, State, Zip Code	Juneau, Alaska 99801		
FRS ID	110001717606		
Permit Number	AKR06AB73		
SIC	1429 (Other Crushed & Broken Stone Mining & Quarrying (pt)) – Primary 1442 (Construction Sand & Gravel Mining) 2951 (Asphalt Paving Mixture & Block mfg)		
Regulatory Representatives Participating in Inspection:			
Title	Name	Organization	
Inspector	Katrina Chambon	EPA Region 10	
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	(2067) 553-6708

SECTION I – Opening Conference

I arrived at the Ketchikan Ready Mix Quarry (the “Site” or “Facility”), located at 4418 N Tongass Hwy, Ketchikan, Alaska, at 09:00 AM (PT) on 06/06/2024 for an announced inspection. I was accompanied by Katrina Chambon, an Inspector in Training, who was there to assist with the inspection and observe inspection procedures. I presented my credentials to Steven Elliot and informed him I was there to determine compliance with the Clean Water Act (CWA), and the facility’s National Pollutant Discharge Elimination System (NPDES) permit, permit # AKR06AB73. This report is based on information supplied by facility representatives, direct observations made by me, and records and reports maintained by the facility. 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
EPA REGION 10	Katrina Chambon	Inspector	Yes	Yes
SECON, Inc	Steven Elliot	Site Manager	Yes	No
SECON, Inc.	Maureen Hanson	Engineering and Environmental Manager	Yes	No
SECON, Inc.	Marianne Kordowski	Project Engineer	Yes	No

Site Information

Responsible official?	Maureen Hanson; cc Steven Elliot, Brian Maller
Type of Operation?	Quarrying of rock for construction activity.
Is property owned or leased?	The property is owned by the operators.
Size of Facility?	17.7 acres
Years in operation?	The site has been in use for approximately 70 years but has only been operating under the current owner since approximately 2011.
Industrial activities exposed to stormwater?	All quarrying and crushing activities are conducted in the open. Vehicles (bucket loaders, flatbed trucks, dump trucks) operate in the open. Vehicle maintenance is performed on site but is done under cover.
Number of employees?	The site has five year-round employees working Monday through Friday from 8am until 3pm. During construction season, the site increases operations by adding up to 20 additional employees and operating Monday through Saturday from 7am until 5pm.
Receiving Water?	The site’s receiving water is the Tongass Narrows.
Personnel conducting inspections/sampling?	Admiralty Environmental is contracted to conduct routine inspections and sampling. Admiralty analyzes pH, total suspended solids, and nitrate/nitrite as N. Samples for analysis of Oil & Grease are sent to Microbac Laboratories, Inc. <u>Admiralty Environmental</u> 641 W Willoughby Ave, Suite 310 Juneau, Alaska 99801 (907) 463-4415 <u>Microbac Laboratories</u> 250 W 84th Dr Merrillville, Indiana 46410 (219) 769-8378
Number of Outfalls?	The facility has two outfalls. One outfall is across the street from the site and the other is a ditch that receives runoff from the site.

Sampling locations?	Stormwater is sampled at the pipe as it's discharged into the Tongass Narrows and from the ditch that received runoff from the site.
Is the SWPPP team present?	Maureen Hansen is the only member of the SWPPP Team present. Ms. Hansen goes to the site once a quarter. She signs and submits the site's DMRs. A member of the SWPPP Team signs the routine inspection reports.
BMPs/Stormwater Treatment?	The site uses berms, filtered catch basins, and a vegetated area to control and "treat" stormwater. The site is also graded from the South to North to direct stormwater flow to the conveyance ditch and vegetated area. The conveyance ditch that receives stormwater has check dams at regular intervals to slow the stormwater flow and allow sediment to drop out.

SECTION II – Observations

No observations were made that constitute an area of constitute and area of concern.

SECTION III – Records Review

Records may not be in sequential order.

Record: Other - Laboratory Reports and Chain of Custody (COC) Documents		AOC: No
Ref #: RA1-RR-005	Reviewed By: Raymond Andrews	Reviewed Date: 06/06/2024
At the time of inspection, I reviewed Laboratory Reports and Chain of Custody documents from 1Q 2021 through 1Q 2024. I did not note any areas of concern.		
Record: Other - Routine Site Inspections		AOC: No
Ref #: RA1-RR-004	Reviewed By: Raymond Andrews	Reviewed Date: 06/06/2024
At the time of the inspection, I reviewed routine site inspections from January 2021 through May 2024. I did not note any areas of concern.		
Record: Other - Quarterly Visual Inspections		AOC: Yes
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 06/06/2024
At the time of inspection, Ms. Chambon reviewed the site's Quarterly Visual Assessments (QVAs) from 1Q 2021 through 1Q 2024. Ms. Chambon found the QVIs were missing required photo documentation.		
Record: Other - Stormwater Pollution Prevention Plan (SWPPP)		AOC: Yes
Ref #: RA1-RR-002	Reviewed By: Raymond Andrews	Reviewed Date: 06/06/2024
At the time of the inspection, Ms. Chambon reviewed the facility's SWPPP, revised September 1, 2023. It was signed and certified on November 2, 2023. Ms. Chambon did not find documentation showing the SWPPP had been updated annually or employee training documentation.		
Record: Other - EPA's Integrated Compliance Information System (ICIS) Database		AOC: Yes
Ref #: RA1-RR-001	Reviewed By: Raymond Andrews	Reviewed Date: 06/06/2024
Prior to the inspection, I reviewed a violations report generated by ICIS for the period from June 2019 through May 2024. The report showed the facility failed to submit 29 Discharge Monitoring Reports (DMRs) during that time. A list of missing DMRs is in Appendix 2.		

SECTION IV – Sampling Activities

No sampling conducted.

SECTION V – Areas of Concern

Areas of concern may not be in sequential order.

The presentation of areas of concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-001	Records Review: Other - EPA's Integrated Compliance Information System (ICIS) Database
Permit Requirement Part 9.1 of the permit states, in part, "All monitoring data...must be submitted to DEC...no later than the 15th day of the following month after the permittee has received the complete laboratory results for all monitored outfalls for the reporting period."	
AOC: The facility failed to submit 29 complete Discharge Monitoring Reports (DMRs) during that time. A list of the missing DMRs is in a table in Appendix 2.	
AOC Reference #: RA1-RR-002	Records Review: Other - Stormwater Pollution Prevention Plan (SWPPP)
Permit Requirement Part 5.6.5 of the permit states, in part, "The SWPPP must be updated at least annually."	
AOC: No documentation was found showing the SWPPP was reviewed and/or updated annually.	
AOC Reference #: RA1-RR-002	Records Review: Other - Stormwater Pollution Prevention Plan (SWPPP)
Permit Requirement Part 4.2.9 of the permit states, in part, "Training shall be conducted at least annually (or more often if employee turnover is high) and documented in the SWPPP."	
AOC: No employee training documentation was found for 2023.	
AOC Reference #: RA1-RR-003	Records Review: Other - Quarterly Visual Inspections
Permit Requirement Part 6.2.2 of the permit states, in part, "A permittee must document the results of their visual assessments and maintain this documentation onsite with the SWPPP...permittees documentation of the visual assessment must include...Photographs of sample and sample location..."	
AOC: Quarterly Visual Assessments were missing required photo documentation.	

SECTION VI – Closing Conference

I held a closing conference with facility personnel at 12:10 PM (PT) on 06/06/2024 for the inspection. During the closing conference, I discussed the observations and Areas of Concern I identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – List of Appendices

1. Photo Log
2. Table of Missing DMRs

APPENDIX 1: Photo Log

All photos were taken by Lead EPA Inspector, Ray Andrews, during the inspection.

Photos were not manipulated beyond minor cropping for sizing and labels or callouts to draw attention to the subject of the photo.

All photos taken during the inspection are included in the Photo Log; however, only photos that support an Observation or Area of Concern are included in the inspection report.

- P1010961 – Lab Report, November 29, 2023
- P1010962 – SWPPP Cover Page
- P1010963 – Stormwater Conveyance Ditches with Check Dams, photo 1
- P1010964 – Stormwater Conveyance Ditches with Check Dams, photo 2
- P1010565 – Stormwater Conveyance Ditches with Check Dams, photo 3
- P1010966 – Stormwater Conveyance Ditches with Check Dams, photo 4
- P1010967 – Sampling Point 2, photo 1
- P1010968 – Sampling Point 2, photo 2
- P1010969 – Sampling Point 2, photo 1
- P1010970 – Sampling Point 2, photo 2

APPENDIX 2: Table of Missing DMRs

Monitoring Period End Date	DMR Due Date
09/30/2020	10/15/2020
10/31/2020	11/15/2020
11/30/2020	12/15/2020
12/31/2020	01/15/2021
01/31/2021	02/15/2021
02/28/2021	03/15/2021
03/31/2021	04/15/2021
04/30/2021	05/15/2021
05/31/2021	06/15/2021
06/30/2021	07/15/2021
07/31/2021	08/15/2021
08/31/2021	09/15/2021
09/30/2021	10/15/2021
10/31/2021	11/15/2021
11/30/2021	12/15/2021
12/31/2021	01/15/2022
01/31/2022	02/15/2022
02/28/2022	03/15/2022
03/31/2022	04/15/2022
04/30/2022	05/15/2022
05/31/2022	06/15/2022
06/30/2022	07/15/2022
07/31/2022	08/15/2022
08/31/2022	09/15/2022
09/30/2022	10/15/2022
10/31/2022	11/15/2022
11/30/2022	12/15/2022
12/31/2022	01/15/2023
12/31/2023	01/15/2024