

Region 5 Enforcement and Compliance Assurance Division


INSPECTION REPORT


Inspection Date(s):	04/20/2022 - 04/20/2022	Announced: No
Time:	Entry: 11:33 AM (CT)	Exit: 01:19 PM (CT)

Media:	Water
Statute(s)/Program(s):	Clean Water Act, NPDES, Stormwater – Industrial
Type of inspection:	ISI - Industrial Stormwater Inspection
Access:	Granted

Permittee Name:	Columbia Quarry Company
Facility or Site Name:	Columbia Quarry Company – Dupo Quarry Plant #9
Facility/Site Physical Address:	100 Industrial Drive
(City, state, zip code)	Dupo, IL 62239
County/Parish:	
Facility GPS Coordinates:	38.505978, -90.200772
Mailing address: (If different)	
(City, state, zip code)	
Facility/Site Identifier:	110001686355
Permit Number:	ILG840213
SIC or NAICS:	

Persons Participating in Inspection:					
Title	Name	Phone	Email	Present at Opening Conf.	Present at Closing Conf.
Lead Inspector	Joan Rogers	(312) 886-2785	rogers.joan@epa.gov	Yes	Yes
Inspector	Cheryl Burdett	(312) 886-1463	burdett.cheryl@epa.gov	Yes	Yes
Inspector	Wayne Caughman		wayne.caughman@illinois.gov	Yes	Yes
Superintendent	Philip Skuta	(618) 286-4824	philips@columbiaquarry.com	Yes	Yes

Lead Inspector:			
Joan Rogers	 <small>Digitally signed by JOAN ROGERS Date: 2022.06.24 11:34:54 -05'00'</small>	[Date]	
	Region 5	rogers.joan@epa.gov	(312) 886-2785

Supervisor Review:			
Ryan Bahr		Digitally signed by Bahr, Ryan Date: 2022.06.24 14:14:08 -05'00'	[Date]
	Region 5	bahr.ryan@epa.gov	

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

An unannounced industrial storm water inspection at a limestone quarry.

Region 5 Lead Inspector, Joan Rogers, arrived at the Columbia Quarry Company (the “Site” or “Facility”), located at 100 Industrial Drive, at 11:33 AM (CT) on 04/20/2022 for an unannounced inspection. EPA inspectors, Ms. Rogers and Ms. Burdett, and IEPA inspector, Mr. Caughman, presented credentials to Phil Skuta and informed him that this was a Region 5 inspection to determine compliance with the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) permit program.

The inspection was conducted under the authority of Region 5 NPDES permit program, under the authority of the Federal CWA of Section 308. The table above identifies the attendees that participated in the inspection. This report is based on information supplied by Columbia Quarry Company representatives, observations made by the Region 5 inspector, and records and reports maintained by the permittee and the Region 5 including: direct observations made by the Region 5 Inspector(s), photographs taken by Region 5 inspector(s), physical evidence collected by the Region 5 inspector(s), measurements taken by Region 5 inspector(s), verbal or written statements made by information supplied by Columbia Quarry Company representatives (the permittee) during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the Region 5 inspector(s) by Columbia Quarry Company representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or subsequent to the Inspection from a review of USEPA, State, and public records may be included in this report.

Facility/Site Description

Region 5 lead inspector confirmed the following facility information:

Mr. Skuta explained that the Columbia Quarry Company owns two quarries in St. Clair County, the Columbia Plant #9, also called the Dupo Quarry Plant #9, and Columbia Plant #1. Columbia Plant #9 is covered under the Illinois General Permit for Non-Coal Mining Discharges. The Permit Number is ILG840213. The Permit was issued on March 1, 2019 and has an expiration date of February 29, 2024. The Permit has a monthly average limit of 35 mg/L for TSS and a daily maximum for TSS of 70 mg/L. Flow is also required to be measured. Discharge Monitoring Reports are required to be submitted monthly. Additionally, the Permit requires the development of a Storm Water Pollution Prevention Plan (SWPPP) and visual inspections of the discharge.

Ms. Rogers explained that she would like to inspect both quarries owned by the Columbia Quarry Company in St. Clair County. The inspection team began with the Dupo Quarry Plant #9. Mr. Skuta did not claim CBI on any information.

The Dupo Quarry Plant #9 is comprised of approximately 695 acres, of which approximately 200 acres are used for the quarry operations. The quarrying operations include stockpiling, mining, processing, and maintenance. Also on the property are wetlands, farm fields and timber and bluff property. The mining operations consist of excavation, crushing, screening, and stockpiling. The Dupo Quarry Plant #9 employs 22 people in typical daytime shifts five days per week. There are two fuel tanks on site, one diesel and one gas. Both are above-ground and have concrete secondary containment around the tanks.

Inspection Date(s):

Two outfalls are permitted under the Permit, Outfall 001, and Outfall 002. Discharge, at an average rate of 0.56 MGD to Outfall 001 flows through wetlands and eventually to Prairie Lake. The discharges to Outfall 002 are intermittent and depend on rainfall. Outfall 002 also flows to Prairie Lake after flowing through a wetland area. Outfall 001 receives storm water from approximately 250 acres, while Outfall 002 receives storm water from approximately 25 acres.

Mr. Skuta stated that he conducts the sampling as required by the Permit. Once per month, he uses a 5-gallon bucket to collect water and takes his grab sample from the bucket of water. The sample is sent to a lab in St. Louis and is analyzed for pH and TSS. The sample is picked up by UPS on the same day that it is collected. The sample is not packed in ice or ice packs. Mr. Skuta stated that flow is measured by weirs, but the weirs are not calibrated. Mr. Skuta uses a standard checklist to perform the visual observations of the discharges, and he submits the DMRs to the state.

EPA briefly reviewed the SWPPP at the Site and requested documentation to be submitted electronically. The documentation requested was:

1. The Facility’s SWPPP.
2. DMR and Sample Analysis for the previous two years.
3. Annual Reports from the previous two years.
4. Facility inspection reports from the previous two years.

Location(s) Observed at the Facility

Location/Area/Sub-area	Description
Primary Settling Pond	The Primary Settling Pond accepts storm water from surface flow and from the pumped pit water.
Quarry Pit and Quarry Pit Pump	The pump and piping for dewatering the quarry pit.
Sedimentation Pond - Pre-Outfall 002	A narrow pond that receives flow from the surface and the flow goes via gravity to Outfall 002.
Storm Water Ditch	Storm water ditch flows to the Primary Settling Pond.

SECTION II – OBSERVATIONS

Location: Sedimentation Pond - Pre-Outfall 002	
Contains CBI: No	
Observation #: JR4-OB-001	Date: 04/20/2022
<p>EPA inspectors observed a sedimentation pond on the northwest side of the quarry where the plant stockpiles crushed limestone. The sedimentation pond allows sedimentation to fall out of the storm water before flowing via gravity to a wetland and eventually to Outfall 002 to Prairie Lake. This sedimentation pond accepts surface flow from approximately 22 acres. EPA observed the flow going into the pipe from the sedimentation pond to a swamp/wetland area before flowing to Outfall 002.</p>	
Location: Primary Settling Pond	
Contains CBI: No	

Observation #: JR4-OB-002	Date: 04/20/2022
<p>EPA traveled with Mr. Skuta to the Primary Settling Pond. This pond accepts storm water from surface flow and from water pumped up from the quarry pit. The water pumped up from the quarry pit is used on the facility's conveyor belts to transport crushed limestone and for dust suppression. What is not needed for these operations is pumped to a storm water ditch which flows via gravity to the Primary Settling Pond. The water in the Primary Settling Pond flows via gravity through Outfall 001 to Prairie Lake.</p>	
Location: Storm Water Ditch	Contains CBI: No
Observation #: JR4-OB-003	Date: 06/17/2022
<p>Pit water that is not needed for the conveyor belts at the quarry or for dust suppression is pumped to the Storm Water Ditch. EPA observed a rock check dam in the ditch before the flow reached the Primary Settling Pond. The rock check dam slows the flow of water so sedimentation can settle out.</p>	
Location: Quarry Pit and Quarry Pit Pump	Contains CBI: No
Observation #: JR4-OB-004	Date: 06/17/2022
<p>EPA arrived at the quarry pit and observed the scaffolding that held the piping for the pump in the quarry pit. The pump and piping were on the east side of the quarry pit. EPA observed that the pipe from the pit was leaking, and water collected on the ground around the scaffolding. Eventually, the water would flow back into the pit.</p> <p>Near the scaffolding, EPA observed the piping that allowed pumped water to be pumped into trucks for dust suppression.</p>	

SECTION III – RECORDS REVIEW

Record: Permit	AOC: No
Ref #: JR4-RR-001 Reviewed By: Joan Rogers	Reviewed Date: 06/17/2022
<p>EPA reviewed the Permit for the Dupo Quarry.</p>	
Document(s)	
<p>1. Columbia Plant 9 - Dupo Quarry Permit ILG840213.pdf</p>	
Record: DMR Reports	AOC: Yes

Inspection Date(s):

04/20/2022 - 04/20/2022

Ref #: JR4-RR-002	Reviewed By: Joan Rogers	Reviewed Date: 06/22/2022
<p>EPA reviewed the DMRs and the Reports of Analysis for January 2020 through December 2020.</p> <p>In February 2020, the sample for Outfall 002 for TSS was 74 mg/L which is over the NPDES Permitted limit of 70 mg/L for a daily maximum limit.</p> <p>Two additional samples were taken at this outfall on February 19, 2020, and February 24, 2020. Those TSS values were 5 mg/L and <5 mg/L respectively. Averaging the values for TSS for the month (28 mg/L), the facility was in compliance for the monthly average of 35 mg/L.</p>		
Document(s)		
<ol style="list-style-type: none"> 1. Columbia Plant 9 - Dupo Quarry DMRs 2020.pdf 2. Columbia Plant 9 - Dupo Quarry Sample Analysis 2020 less September and October.pdf 		
Record: DMR Reports		AOC: Yes
Ref #: JR4-RR-003	Reviewed By: Joan Rogers	Reviewed Date: 06/22/2022
<p>EPA reviewed the DMRs and the Reports of Analysis for January 2021 through December 2021.</p> <p>There were no exceedances of the NPDES Permit limit.</p> <p>For January and February 2021, there were sample analysis of discharge from Outfall 001 on the Report of Analysis from the St. Louis Testing Laboratories. The values did not exceed the NPDES Permit limit, but the DMR listed "No Discharge" from Outfall 001 in those two months. If there was a discharge to sample from, then the DMR should not list "No Discharge" from the Outfall.</p>		
Document(s)		
<ol style="list-style-type: none"> 1. Columbia Plant 9 - Dupo Quarry DMRs and Sample Analysis January 2021-June 2021.pdf 		
Record: Other - Sample Analysis		AOC: Yes
Ref #: JR4-RR-004	Reviewed By: Joan Rogers	Reviewed Date: 06/22/2022
<p>The Report of Analysis from the St. Louis Testing Laboratories states that Method Number 160.2 is used for TSS. The approved method for TSS sampling is SM 2540 D. The facility's lab is not using the correct test method for TSS.</p> <p>The holding time for TSS samples from the time collected until analysis is seven days and the samples must be chilled to less than or equal to 6°C. Although the analysis for TSS was completed within seven days of submittal of the samples to the lab, there is no documentation when the samples were collected and therefore no documentation that the holding times were met. There also is no documentation that the samples were preserved to the proper temperature.</p>		
Document(s)		
<ol style="list-style-type: none"> 1. Columbia Plant 9 - Dupo Quarry Sample Analysis 2020 less September and October.pdf 2. Columbia Plant 9 - Dupo Quarry DMRs and Sample Analysis January 2021-June 2021.pdf 3. Columbia Plant 9 - Dupo Quarry DMRs and Sample Analysis June 2021-Dec 2021.pdf 		

Inspection Date(s):

04/20/2022 - 04/20/2022

Record: Other - Sample Analysis	AOC: Yes
Ref #: JR4-RR-005 Reviewed By: Joan Rogers	Reviewed Date: 06/22/2022
<p>The holding time for pH using EPA Method SM 4500-H is 15 minutes. The samples must be chilled to less than or equal to 6°C.</p> <p>Although the pH is typically analyzed on the same day that the samples were submitted, there is no documentation of when the samples were collected, and therefore no documentation that the holding time was met. There is also no documentation that the sample was preserved properly.</p> <p>In August 2020, the sample was submitted on 8/7/20, but the analysis was completed on 8/11/20.</p>	
Document(s)	
<ol style="list-style-type: none"> 1. Columbia Plant 9 - Dupo Quarry Sample Analysis 2020 less September and October.pdf 2. Columbia Plant 9 - Dupo Quarry DMRs and Sample Analysis January 2021-June 2021.pdf 3. Columbia Plant 9 - Dupo Quarry DMRs and Sample Analysis June 2021-Dec 2021.pdf 	
Record: Other - Sample Analysis	AOC: Yes
Ref #: JR4-RR-006 Reviewed By: Joan Rogers	Reviewed Date: 06/22/2022
<p>The analysis method for pH was listed as method 150.1. According to Section (10) of the General Conditions of the Permit, monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in the Permit.</p> <p>There are no other test procedures specified in the Permit for analysis of pH and the approved method for pH analysis under 40 CFR Part 136 is SM 4500-H+B.</p> <p>The facility's lab is using an improper method for pH analysis.</p>	
Document(s)	
<ol style="list-style-type: none"> 1. Columbia Plant 9 - Dupo Quarry Sample Analysis 2020 less September and October.pdf 2. Columbia Plant 9 - Dupo Quarry DMRs and Sample Analysis January 2021-June 2021.pdf 3. Columbia Plant 9 - Dupo Quarry DMRs and Sample Analysis June 2021-Dec 2021.pdf 	
Record: Other - Compliance Sampling	AOC: Yes
Ref #: JR4-RR-007 Reviewed By: Joan Rogers	Reviewed Date: 06/22/2022
<p>The Permit requires three grab samples per month as separate grab samples or one time per month as a composite sample. The composite sample shall consist of at least 3 sample aliquots of approximately equal volume, collected within a 24-hour period.</p> <p>Mr. Skuta stated that he collects one sample per month at each Outfall by filling a 5-gallon bucket and taking a grab sample from that. One grab sample, once per month is not in compliance with the Permit.</p>	
Document(s)	
<ol style="list-style-type: none"> 1. Columbia Plant 9 - Dupo Quarry Permit ILG840213.pdf 	

Inspection Date(s):

04/20/2022 - 04/20/2022

Record: Annual Reports	AOC: Yes
Ref #: JR4-RR-008	Reviewed By: Joan Rogers
	Reviewed Date: 06/22/2022
<p>EPA reviewed the Annual Report for the timeframe 5/15/2019 - 5/15/2020. The Annual Site Compliance Evaluation included with this report was dated 5/26/2020, outside the time frame of the annual report. The quarterly reports were included. They were dated 6/27/19, 9/28/19, 12/3/19, and 3/31/20.</p> <p>EPA also reviewed the Annual Report for the timeframe 5/15/2020 - 5/15/2021. The Annual Site Compliance Evaluation included with this report was dated 6/2/2020, outside the time frame of the annual report. The quarterly reports were included. They were dated 6/19/20, 9/10/20, 12/15/20, and 3/15/21.</p>	
Document(s)	
<ol style="list-style-type: none"> 1. Columbia Plant 9 - Dupo Quarry Annual Report 20190515 - 20200515.pdf 2. Columbia Plant 9 - Dupo Quarry Annual Report 20200515 - 20210515.pdf 	
Record: SWPPP	AOC: No
Ref #: JR4-RR-009	Reviewed By: Joan Rogers
	Reviewed Date: 06/22/2022
<p>The SWPPP for the Columbia Quarry Company's Dupo Quarry Plant #9 was prepared by API Survey, LLC. The current plan is dated October 3, 2019. It is signed by both the plan preparer and the facility manager, Jacob Smith. The SWPPP contains the required elements of facility site description, site maps, narratives of the nature of the facility's activities and controls to prevent pollution into the storm water.</p>	
Document(s)	
<ol style="list-style-type: none"> 1. Columbia Plant 9 - Dupo Quarry SWPPP.pdf 	
Record: Other - Dupo Quarry Pollution Prevention Team - Appendix B	AOC: No
Ref #: JR4-RR-010	Reviewed By: Joan Rogers
	Reviewed Date: 06/17/2022
<p>The Pollution Prevention Team is in Appendix B of the SWPPP. On Worksheet #1, the team is listed as Jacob Smith, Mark Kern, Philip Skuta, and Heather Hefler. The documentation of the team is dated April 3, 2019, and was completed by the Manager, Jacob Smith. The responsibilities of each team member are listed.</p>	
Document(s)	
<ol style="list-style-type: none"> 1. Columbia Plant 9 - Dupo Quarry Pollution Prevention Team.pdf 	
Record: Facility Map – Dupo Quarry SWPPP Appendix C	AOC: No
Ref #: JR4-RR-011	Reviewed By: Joan Rogers
	Reviewed Date: 06/17/2022
<p>Appendix C of the SWPPP includes six facility maps. They include a Topographic Map, a Site Overview Map, a Bluff Erosion Correction Plan map, and maps for the South Yard, Mid Yard, and North Yard. EPA noted that the concrete weirs that were installed at the outfalls before the March 2020 quarterly inspection are listed on the Site Overview Map.</p>	
Document(s)	

Inspection Date(s):

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1. Columbia Plant 9 - Dupo Quarry SWPPP Appendix C.pdf	
Record: Other - SWPPP Appendix D AOC: No	
Ref #: JR4-RR-012	Reviewed By: Joan Rogers Reviewed Date: 06/22/2022
The SWPPP's Appendix D is for the Material Inventory and Exposed Significant Materials. Worksheet #3 and #3A can be used for materials inventory summaries and summaries of exposed significant materials. Mr. Skuta provided Appendix D via email on June 20, 2022. Handwritten notes on Worksheet #3A states that there are no significant material exposed. Handwritten notes on Worksheet #3 states that there are no exposed material of significance.	
Document(s)	
1. Columbia Plant 9 - Dupo Quarry SWPPP Appendix D.pdf	
Record: Other - SWPPP Appendix E AOC: No	
Ref #: JR4-RR-013	Reviewed By: Joan Rogers Reviewed Date: 06/22/2022
The SWPPP's Appendix E is meant to be used to document significant leaks and spills. Worksheet #4 can be used to document them. No significant leaks or spills were identified in Appendix E.	
Document(s)	
1. Columbia Plant 9 - Dupo Quarry SWPPP Appendix E-H.pdf	
Record: Other - SWPPP Appendix F AOC: Yes	
Ref #: JR4-RR-014	Reviewed By: Joan Rogers Reviewed Date: 06/22/2022
The SWPPP states that Worksheets #5 and #6 in Appendix F can be used for Non-Storm Water Discharge Assessment and Certification. The SWPPP does not contain a certification that Columbia Quarry Company has checked for non-storm water discharges at the facility. Worksheet #6 states that all outfalls are tested.	
Document(s)	
1. Columbia Plant 9 - Dupo Quarry SWPPP Appendix E-H.pdf	
Record: Other - SWPPP Appendix G AOC: No	
Ref #: JR4-RR-015	Reviewed By: Joan Rogers Reviewed Date: 06/22/2022
SWPPP Appendix G is used to document any storm water sampling data. There were no documents in Appendix G.	
Record: Other - SWPPP Appendix H AOC: Yes	
Ref #: JR4-RR-016	Reviewed By: Joan Rogers Reviewed Date: 06/22/2022
The SWPPP states that training on storm water management practices will be performed at least every 12 months.	

Worksheet #7 in Appendix H can be used to document the training. Mr. Skuta provided Appendix H on June 18, 2022.

Appendix H had two employee training worksheets, The listed training for Jacob Smith and Mark Kern on April 3, 2019, and for Phil Skuta on May 13, 2019. There were no training documents for 2020, 2021, or 2022.

Document(s)

Columbia Plant 9 - Dupo Quarry SWPPP Appendix E-H.pdf

Record: Other - SWPPP Appendix I

AOC: Yes

Ref #: JR4-RR-017 **Reviewed By:** Joan Rogers

Reviewed Date: 06/22/2022

The SWPPP states that a Pollution Prevention Team member at the Facility will perform quarterly inspections of areas that may potentially contribute pollutants to storm water discharges. Worksheet #8 can be used to document these inspections. At least one of the quarterly inspections should be during wet weather and one during dry weather.

Mr. Skuta provided documentation of the quarterly inspections from 2nd Quarter 2019 through 2nd Quarter 2022. There was no documentation on any of the quarterly inspections if the inspection was performed in wet or dry weather.

The SWPPP also states that at least once per month, a visual inspection will be performed of the storm water discharge from the Facility. Worksheet #9 can be used to document the monthly visual inspections. At a minimum, the outfalls should be examined as well as the areas that discharge into the south wetland.

Mr. Skuta provided documentation of the monthly visual examinations of storm water discharge worksheets. They were dated from April 2019 through October 2019. For most of the months in 2019, the examinations were performed more frequently than once per month. For April 2019, there were three completed worksheets. For May, June, and July 2019, there were five completed worksheets for each month. For August 2019, there were four completed worksheets. For September 2019, there was one worksheet, and for October 2019, there were two worksheets. The final worksheet was not dated. The evaluations were conducted during rainfall. No monthly visual examinations of storm water discharge quality were submitted for November 2019, all of 2020, 2021, or January through March 2022. EPA requested additional visual inspection documentation and Mr. Skuta stated via email that he does not have visual inspection records.

Additionally, the SWPPP states that a member of the Pollution Prevention Team shall conduct a site compliance evaluation at least once a year, called the Annual Site Compliance Evaluation, to verify that all elements of the SWPPP are still accurate and effective. Worksheet #10 can be used to document the annual inspections.

Mr. Skuta provided documentation of three Annual Site Compliance Evaluations. The dates of the compliance evaluations were May 26, 2020, June 2, 2021, and May 15, 2022. The review and observations of the annual reports is in Record Review JR4-RR-015

In addition to the two permitted Outfalls being sampled, the SWPPP states that a visual inspection and sampling from the discharge to the south wetland will be conducted once per year. No documentation that this sampling or visual inspection has been performed was provided to EPA.

Document(s)

1. Columbia Plant 9 - Dupo Quarry SWPPP Appendix I Worksheet 8.pdf
2. Columbia Plant 9 - Dupo Quarry SWPPP Appendix I Worksheet 9.pdf
3. Columbia Plant 9 - Dupo Quarry SWPPP.pdf

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was 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.

Location:	Area:	Sub-area:
JR4-RR-012		
<p>Handwritten notes on Worksheet #3A states that there are no significant material exposed. Handwritten notes on Worksheet #3 states that there are no exposed material of significance.</p> <p>Aggregate Stockpiles, Fuel Loading and Unloading, Plant Processing Areas, and Petroleum Products in Aboveground Storage Tanks are some of the significant materials observed by EPA inspectors at the Columbia Plant #9 – Dupo Quarry. All of these materials are exposed to storm water.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213</p>	<p>Sections: Special Condition 19.b.ii)(D)(i)5, and Special Condition 19.b.ii)(D)(i)6.</p>
JR4-RR-014		
<p>The SWPPP does not contain a certification that Columbia Quarry Company has checked for non-storm water discharges at the facility.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213</p>	<p>Sections: Special Condition 19.b.ii)(D)(ii)3.</p>
JR4-RR-016		
<p>There were no training documents for 2020, 2021, or 2022.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213 and Columbia Plant 9 - Dupo Quarry SWPPP</p>	<p>Sections: Permit Special Condition 19.b.ii)(D)(ii)2.f.vi. and SWPPP page 13.</p>
JR4-RR-017		

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<p>In addition to the two permitted Outfalls being sampled, the SWPPP states that a visual inspection and sampling from the discharge to the south wetland will be conducted once per year. No documentation that this sampling or visual inspection has been performed was provided to EPA.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry SWPPP</p>	<p>Sections: SWPPP page 15.</p>
<p>No monthly visual examinations of storm water discharge quality were submitted for November 2019, all of 2020, 2021, or January through March 2022.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213 and Columbia Plant 9 - Dupo Quarry SWPPP</p>	<p>Sections: Permit Section: Effluent Limitations, Monitoring, and Reporting and SWPPP page 15.</p>
<p>There was no documentation on any of the quarterly inspections if the inspection was performed in wet or dry weather.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213 and Columbia Plant 9 - Dupo Quarry SWPPP</p>	<p>Sections: Permit Special Condition 19.b.ii)(D)(iv) and SWPPP page 14.</p>
<p>JR4-RR-008</p>		
<p>The Annual Site Compliance Evaluation included with this report was dated 6/2/2020, outside the time frame of the annual report.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213</p>	<p>Sections: Special Condition 25 and Special Condition 19.b.ii)(D)(ii)4.</p>
<p>The Annual Site Compliance Evaluation included with this report was dated 5/26/2020, outside the time frame of the annual report.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213</p>	<p>Sections: Special Condition 25 and Special Condition 19.b.ii)(D)(ii)4.</p>
<p>JR4-RR-003</p>		
<p>For January and February 2021, there were sample analysis of discharge from Outfall 001 on the Report of Analysis from the St. Louis Testing Laboratories. The values did not exceed the NPDES Permit limit, but the DMR listed "No Discharge"</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213</p>	<p>Sections: Standard Condition (12)(e)(1) and Special Condition 3.</p>

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<p>from Outfall 001 in those two months. If there was “No Discharge,” why were there sample analysis from the discharges?</p>		
<p>JR4-RR-007</p>		
<p>Mr. Skuta stated that he collects one sample per month at each Outfall by filling a 5-gallon bucket and taking a grab sample from that. The Permit requires three grab samples per month as separate grab samples or one time per month as a composite sample. The composite sample shall consist of at least 3 sample aliquots of approximately equal volume, collected within a 24-hour period.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213</p>	<p>Sections: Effluent Limitations, Monitoring, and Reporting.</p>
<p>JR4-RR-002</p>		
<p>In February 2020, the sample for Outfall 002 for TSS was 74 mg/L which is over the NPDES Permitted limit of 70 mg/L.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213</p>	<p>Sections: Effluent Limitations, Monitoring, and Reporting.</p>
<p>JR4-RR-006</p>		
<p>The facility's lab is using an improper method for pH analysis.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213</p>	<p>Sections: Standard Condition (10)(d).</p>
<p>JR4-RR-005</p>		
<p>Although the pH is analyzed on the same day that the samples were submitted, there is no documentation that the holding time was met, or that the sample was preserved properly.</p> <p>In August 2020, the sample was submitted on 8/7/20, but the analysis was completed on 8/11/20.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213</p>	<p>Sections: Standard Condition (10).</p>

JR4-RR-004		
<p>Although the analysis for TSS was completed within seven days of submittal of the samples to the lab, there is no documentation when the samples were collected and therefore no documentation that the holding times were met. There also is no documentation that the samples were preserved to the proper temperature.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213</p>	<p>Sections: Standard Condition (10).</p>
<p>The facility's lab is not using the correct test method for TSS.</p>	<p>Citations: Columbia Plant 9 - Dupo Quarry Permit ILG840213</p>	<p>Sections: Standard Condition (10)(d).</p>

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

Ms. Rogers held a closing conference with Facility personnel at 01:19 PM (CT) on 04/20/2022 for the inspection. During the closing conference, Region 5 Lead Inspector discussed the observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

EPA requested documentation to be sent via email and exited the facility at 1:19 P.M.

Follow Up

There were no follow up items requested at the time of the inspection.

Communication Log

No additional information received by Region 5 after exiting the Facility on 04/20/2022.

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Document Log

APPENDIX 1: PHOTOLOG

ILG840213 - Columbia Plant #9 - Dupo Quarry

EPA Inspection April 20, 2022

All photos taken by Cheryl Burdett, Life Scientist/Inspector, U.S. EPA

Camera: Olympus Tough TG-4



1: P4200029

Description: A sedimentation pond at the Dupo Quarry allows sedimentation to fall out before flowing via gravity to Outfall 002. Approximately 22 acres of storm water flow to Outfall 002.

Location: West side of the Dupo Quarry.

Camera Direction: North.

Date/Time: April 20, 2022/12:31 P.M.



2: P4200030

Description: The pipe for flow to exit via gravity from the sedimentation pond to Outfall 002.

Location: West side of the Dupo Quarry.

Camera Direction: West

Date/Time: April 20, 2022/12:31 P.M.



3: P4200031

Description: Flow from the sedimentation pond goes north to a swamp/wetland area before flowing via gravity to Outfall 002.

Location: West side of the Dupo Quarry.

Camera Direction: Northwest

Date/Time: April 20, 2022/12:33 P.M.



4: P4200032

Description: The Primary Settling Pond accepts storm water from surface flow and from the pumped pit water.

Location: Primary Settling Pond.

Camera Direction: Northeast.

Date/Time: April 20, 2022/12:40 P.M.



5: P4200033

Description: The Primary Settling Pond accepts storm water from surface flow and from the pumped pit water.

Location: Primary Settling Pond.

Camera Direction: Northeast.

Date/Time: April 20, 2022/12:40 P.M.



6: P4200034

Description: Looking upstream along a storm water ditch flows to the Primary Settling Pond.

Location: Southeast of the Primary Settling Pond.

Camera Direction: Southeast.

Date/Time: April 20, 2022/12:41 P.M.



7: P4200035

Description: Downstream in the storm water ditch to the Primary Settling Pond.

Location: Southeast of the Primary Settling Pond.

Camera Direction: Northwest.

Date/Time: April 20, 2022/12:41 P.M.



8: P4200036

Description: The outfall pipe is denoted with a yellow arrow. The pipe allows water to flow via gravity from the Primary Settling Pond to the swamp to the west.

Location: Primary Settling Pond.

Camera Direction: Northwest.

Date/Time: April 20, 2022/12:43 P.M.



9: P4200037

Description: There is a rock check dam on the ditch upstream of the Primary Settling Pond to slow the flow of the water and allow sedimentation to settle out.

Location: Primary Settling Pond.

Camera Direction: East

Date/Time: April 20, 2022/12:43 P.M.



10: P4200038

Description: Pit water is pumped up from the quarry pit and used on the conveyor belts in the quarry. Excess water can be directed to the ditch. The end of the pipe from the pit water to the ditch is circled with a yellow circle.

Location: East of the quarry pit.

Camera Direction: South.

Date/Time: April 20, 2022/12:51 P.M.



11: P4200039

Description: Pit water is pumped up to the ditch.

Location: East of the quarry pit.

Camera Direction: South.

Date/Time: April 20, 2022/12:51 P.M.



12: P4200040

Description: The pump and pipe to dewater the pit is on the east side of the pit. There was a leak in the pipe from the pit but water would flow back into the pit.

Location: East side of the quarry pit.

Camera Direction: South.

Date/Time: April 20, 2022/12:57 P.M.



13: P4200041

Description: Scaffolding for the pump and piping from the quarry pit.

Location: East side of the quarry pit.

Camera Direction: Southwest.

Date/Time: April 20, 2022/12:57 P.M.



14: P4200042

Description: Piped water from the quarry pit can be pumped into trucks for dust suppression.

Location: East side of the quarry pit.

Camera Direction: Northwest.

Date/Time: April 20, 2022/12:58 P.M.



15: P4200043

Description: The pump and piping for dewatering the quarry pit.

Location: East side of the quarry pit.

Camera Direction: Northeast.

Date/Time: April 20, 2022/11:00 P.M.

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Annual Reports	Columbia Plant 9 - Dupo Quarry Annual Report 20200515 - 20210515.pdf	No	No	Joan Rogers	06/22/2022
Annual Reports	Columbia Plant 9 - Dupo Quarry Annual Report 20190515 - 20200515.pdf	No	No	Joan Rogers	06/22/2022
Permit	Columbia Plant 9 - Dupo Quarry Permit ILG840213.pdf	No	No	Joan Rogers	06/22/2022
SWPPP	Columbia Plant 9 - Dupo Quarry SWPPP.pdf	No	No	Joan Rogers	06/22/2022
Other - Columbia Plant 9 - Dupo Quarry Pollution Prevention Team - Attachment B	Columbia Plant 9 - Dupo Quarry Pollution Prevention Team.pdf	No	No	Joan Rogers	06/22/2022
Facility Map -	Columbia Plant 9 - Dupo Quarry	No	No	Joan Rogers	06/22/2022

Inspection Date(s):

04/20/2022 - 04/20/2022

SWPPP Appendix C	SWPPP Appendix C.pdf				
Other - SWPPP Appendix D	Columbia Plant 9 - Dupo Quarry SWPPP Appendix D.pdf	No	No	Joan Rogers	06/22/2022
Other - SWPPP Appendix E	Columbia Plant 9 - Dupo Quarry SWPPP Appendix E-H.pdf	No	No	Joan Rogers	06/22/2022
Other - SWPPP Appendix F	Columbia Plant 9 - Dupo Quarry SWPPP Appendix E-H.pdf	No	No	Joan Rogers	06/22/2022
Other - SWPPP Appendix H	Columbia Plant 9 - Dupo Quarry SWPPP Appendix E-H.pdf	No	No	Joan Rogers	06/22/2022
Other - SWPPP Appendix I	Columbia Plant 9 - Dupo Quarry SWPPP Appendix I Worksheet 8.pdf	No	No	Joan Rogers	06/22/2022
Other - SWPPP Appendix I	Columbia Plant 9 - Dupo Quarry SWPPP Appendix I Worksheet 9.pdf	No	No	Joan Rogers	06/22/2022
Other - SWPPP Appendix I	Columbia Plant 9 - Dupo Quarry SWPPP.pdf	No	No	Joan Rogers	06/22/2022
DMR Reports	Columbia Plant 9 - Dupo Quarry DMRs 2020.pdf	No	No	Joan Rogers	06/22/2022
DMR Reports	Columbia Plant 9 - Dupo Quarry DMRs and Sample Analysis January 2021-June 2021.pdf	No	No	Joan Rogers	06/22/2022
DMR Reports	Columbia Plant 9 - Dupo Quarry DMRs and Sample Analysis June 2021-Dec 2021.pdf	No	No	Joan Rogers	06/22/2022
Other - Sample Analysis	Columbia Plant 9 - Dupo Quarry Sample Analysis 2020 less September and October.pdf	No	No	Joan Rogers	06/22/2022
Field Inspection Notes	Field_Notes_110001686355v1.0.pdf	No	No	Joan Rogers	06/22/2022