

**U.S. Environmental Protection Agency
Region 5**

Purpose: Clean Water Act National Pollutant Discharge Elimination System Compliance
Evaluation Inspection

Facility: Hilltop Basic Resources, Inc.
Downtown Cincinnati River Terminal
511 W. Water Street
Cincinnati, Ohio 45202

Inspection Date: May 24, 2023

U.S. EPA Representatives:

Jake Berger, Physical Scientist, 312-353-8024, berger.jake@epa.gov

Jennifer Bush, Environmental Scientist, 312-886-0879, bush.jennifer@epa.gov

Facility Representatives:

Tom Ackley, Plant & Maintenance Manager

Geoff Coldiron, Safety Director

Report Prepared by: Jake Berger, Physical Scientist
Water Enforcement and Compliance Assurance Branch, Section 1

Inspector Signature and Date: Berger, Jake Digitally signed by Berger,
Jake
Date: 2023.06.16
14:26:57 -05'00'

Approver Name and Title: Molly Smith, Section 1 Supervisor
Water Enforcement and Compliance Assurance Branch

Approver Signature and Date: MOLLY
SMITH Digitally signed by
MOLLY SMITH
Date: 2023.06.16
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PURPOSE OF INSPECTION

The purpose of the inspection by the U.S. Environmental Protection Agency (USEPA) at the Hilltop Basic Resources, Inc. – Downtown Cincinnati River Terminal (Hilltop or Facility) was to describe, evaluate, and document compliance with the Clean Water Act (CWA) and their National Pollutant Discharge Elimination System (NPDES) permit.

BACKGROUND

Hilltop is a ready-mix concrete producer with 40 employees in Cincinnati, Ohio. Hilltop is located on the Ohio River and receives bulk sand and gravel aggregate material at the Facility via barge. Powdered cement is brought in via truck. Hilltop produces about 650 cubic yards of concrete onsite per day and takes it out via their own concrete mixer trucks. Bulk sand and stone aggregate material are stored in large, uncovered piles in the stockyard near the concrete production area, uphill from the Ohio River. Hilltop uses water from the city to use as an ingredient for the concrete. Hilltop has two well water pumps on the property: one serves as a backup for the city water supply, and one is used to clean the conveyors when in use, and if necessary. Hilltop takes samples of their industrial stormwater discharges from where stormwater flows into the city storm drain on Water Street. These discharges are covered by the Ohio Environmental Protection Agency (OEPA) Industrial Storm Water General Permit (Permit) (OEPA Facility ID # 1GR01157*GG; Federal NPDES Identifier # OHR000007) which has an Effective Date of September 15, 2022, and an Expiration Date of May 31, 2027.

INSPECTION

Jake Berger and Jennifer Bush of USEPA first arrived at the Facility at 9:04 a.m. EDT and were met by Tom Ackley (Plant & Maintenance Manager). Jake Berger and Jennifer Bush showed him their credentials and identification, and began the opening conference.

Opening Conference

USEPA staff explained that the purpose of the inspection was to:

- Review Hilltop's records, including sample measurements, monitoring activities, and storm water plans, as required by the Permit for Facility ID # 1GR01157*GG;
- Conduct a walkthrough of the Facility;
- Identify locations where storm water control had the potential to be insufficient; and
- Inform Hilltop of areas of concern regarding the records review and Facility walkthrough.

The opening conference ended at 9:32 a.m. EDT and was immediately followed by a Facility walkthrough with Tom Ackley and Geoff Coldiron.

Facility Walkthrough

USEPA staff made the following observations during the Facility walkthrough with Tom Ackley and Geoff Coldiron, further documented in the Photograph Log (attached):

- Hilltop is planning to end operations at this Facility and relocate to a new location farther south on the Ohio River. Hilltop predicts that this Facility will be permanently closed, and operations will begin at a new location by the end of 2024.
- A pump house uses water to rinse out the inside of the drums of the mixer trucks. This water is contained in two pits, to be continually reused onsite for this purpose, and is not discharged (Photo 16).
- The Facility lacks stormwater and sediment controls along the front of the concrete truck loading station and the stormwater drains on Water Street. Sediment that had been rinsed off the concrete trucks had accumulated along the driveway to the loading station and around the stormwater drains (Photos 1 – 4, Photo 17).
- At the time of the inspection there was a pile of material spilled off the conveyor belt in the southeast corner of the Facility. According to the Facility, this excess material is removed after each barge is unloaded; however, at the time of the inspection, sediment and rock aggregate material had still accumulated in this corner (Photos 9 – 11). There were no stormwater or sediment controls to prevent this material from flowing down the ramp to the barge dock and into the Ohio River, where sediment and aggregate material had also accumulated (Photo 7 and Photo 8).
- The southern edge of the Facility and the stockyard lacks stormwater control measures in several places, which allows excess material that is pushed up to the edge to fall down the steep surface leading down to the Ohio River (Photos 12 – 14).

The Facility walkthrough tour ended at 10:55 a.m. EDT and was followed by a review of Hilltop's records.

Records Review

USEPA began reviewing hard copy and electronic records provided by Hilltop with Tom Ackley and Geoff Coldiron at 11:00 a.m. EDT. The following areas of concern were identified:

- Storm water pollution prevention training is required annually for all on-site employees, which has not been conducted since 2019.
- Section 5.5 of Hilltop's Stormwater Pollution Prevention Plan states that the riverbanks are separated from the remainder of the Facility with concrete block dikes. Sections of the riverbank lacked sufficient containment with concrete blocks, as described above. Section 5.5 also does not describe any stormwater controls to be used to minimize

pollution or runoff in areas such as the spillage corner, barge dock, barge dock ramp, and concrete truck loading station, as described above.

USEPA and Hilltop staff paused the records review from 11:45 a.m. EDT to 12:55 p.m. EDT. The records review then continued until 1:25 p.m. EDT, and USEPA ended the records review by requesting that the following documents be provided electronically as soon as possible to USEPA after the inspection:

- Hilltop's Stormwater Pollution Prevention Plan;
- Hilltop's most recent Stormwater Annual Report; and
- Documentation of Hilltop's most recent stormwater employee training.

These documents were sent electronically to Jake Berger on June 9, 2023. The records review was immediately followed by the closing conference.

Closing Conference

USEPA staff relayed the following preliminary comments to Tom Ackley during the closing conference:

- Areas of the Facility, such as the spillage corner, barge dock, barge dock ramp, and concrete truck loading station, lack stormwater control measures. Sediment and aggregate materials had accumulated in these areas, which could be conveyed to the storm drains or the Ohio River.
- The southern edge of the Facility, along the stockyard, lacks stormwater control measures to prevent aggregate material from falling into the Ohio River.
- Storm water pollution prevention training is required annually for all on-site employees, and according to records at the Facility, has not been conducted since 2019.

USEPA confirmed that no information collected during the inspection was considered Confidential Business Information.

USEPA concluded the inspection and left the Facility at 1:45 p.m. EDT.

Hilltop Basic Resources, Inc. - Downtown Cincinnati River Terminal
U.S. EPA Inspection: May 24, 2023
All photos taken by Jake Berger, Physical Scientist, U.S. EPA
Camera: Olympus Tough TG-6



1: P5240021

Description: Concrete mixing truck getting washed while loaded with concrete

Location: Concrete truck loading station

Camera Direction: Northeast

Date/Time: May 24, 2023 / 9:38 a.m. EDT



2: P5240022

Description: Runoff of water used to spray the concrete trucks

Location: Concrete truck loading station

Camera Direction: East

Date/Time: May 24, 2023 / 9:48 a.m. EDT



3: P5240023

Description: Truck wash runoff into the sewer manhole on Water Street

Location: Water Street, near concrete loading station

Camera Direction: East

Date/Time: May 24, 2023 / 9:48 a.m. EDT



4: P5240024

Description: Runoff of water used to spray the concrete trucks, and location of where stormwater monitoring samples are taken.

Location: Water Street, near the concrete loading station

Camera Direction: Southwest

Date/Time: May 24, 2023 / 9:51 a.m. EDT



5: P5240025

Description: Sand pile behind concrete blocks

Location: Stockyard

Camera Direction: Southwest

Date/Time: May 24, 2023 / 9:54 a.m. EDT



6: P5240026

Description: Stockyard and material conveyor belt

Location: Stockyard

Camera Direction: Southwest

Date/Time: May 24, 2023 / 9:57 a.m. EDT



7: P5240027

Description: Barge dock platform on the Ohio River with scraps of sand and gravel material

Location: Barge dock

Camera Direction: South

Date/Time: May 24, 2023 / 10:03 a.m. EDT



8: P5240028

Description: Ramp leading down from stockyard to barge loading platform

Location: Barge dock

Camera Direction: Northeast

Date/Time: May 24, 2023 / 10:04 a.m. EDT



9: P5240029

Description: Corner containing piles of material spilled from the conveyor belt. Ohio River in background behind trees.

Location: Conveyor belt spillage corner

Camera Direction: East

Date/Time: May 24, 2023 / 10:11 a.m. EDT



10: P5240030

Description: Spillage corner overlooking the Ohio River

Location: Conveyor belt spillage corner

Camera Direction: Southwest

Date/Time: May 24, 2023 / 10:12 a.m. EDT



11: P5240031

Description: Edge of spillage corner directly above the Ohio River

Location: Conveyor belt spillage corner

Camera Direction: South

Date/Time: May 24, 2023 / 10:13 a.m. EDT



12: P5240032

Description: Scrap material along Southern edge of Facility directly above the Ohio River

Location: Stockyard

Camera Direction: South

Date/Time: May 24, 2023 / 10:20 a.m. EDT



13: P5240033

Description: Scrap material along southern edge of Facility directly above the Ohio River

Location: Stockyard

Camera Direction: West

Date/Time: May 24, 2023 / 10:20 a.m. EDT



14: P5240034

Description: Edge of stockyard

Location: Stockyard

Camera Direction: East

Date/Time: May 24, 2023 / 10:23 a.m. EDT



15: P5240035

Description: Unknown outfall near southwest corner of Facility

Location: Southwest corner of Facility, downhill from stockyard on the Ohio River

Camera Direction: South

Date/Time: May 24, 2023 / 10:30 a.m. EDT



16: P5240036

Description: Mixer truck rinse water

Location: Mixer truck rinse station

Camera Direction: Northwest

Date/Time: May 24, 2023 / 10:36 a.m. EDT



17: P5240037

Description: Truck wash runoff entering storm drain

Location: Water Street

Camera Direction: West

Date/Time: May 24, 2023 / 10:41 a.m. EDT