

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

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

Facility: MPR Sand Terminals, LLC
5330 Guernsey Street
Bellaire, Ohio 43906

Inspection Date: February 22, 2023

EPA Representatives:

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

Andi Hodaj, Environmental Engineer, 312-353-4645, hodaj.andi@epa.gov

Facility Representatives:

Justin Brown, Vice President of Operations

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: 2023.03.16 11:31:50 -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: 2023.03.16 16:42:27 -05'00'

PURPOSE OF INSPECTION

The purpose of the inspection by the U.S. Environmental Protection Agency (USEPA) at the MPR Sand Terminals, LLC facility (MPR Sand or Facility) was to describe, evaluate, and document compliance with the Clean Water Act (CWA).

BACKGROUND

MPR Sand does not have a National Pollutant Discharge Elimination System (NPDES) permit. The Facility is a frac sand distribution site. Sand is unloaded from barges on the Ohio River into the sand storage warehouse, and then moved into silos to be loaded into trucks and taken offsite. MPR Sand has 35 employees and operates 24 hours per day, 365 days per year.

INSPECTION

Jake Berger and Andi Hodaj of USEPA first arrived at the Facility at 11:37 a.m. EST and were met by Justin Brown, Vice President of Operations, MPR Sand. Jake Berger and Andi Hodaj (inspectors) showed Mr. Brown their inspector credentials and were granted a tour of the Facility and began the opening conference.

Opening Conference

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

- Gain an understanding of MPR Sand's operations;
- Conduct a walkthrough of the Facility;
- Identify locations where storm water control had the potential to be insufficient; and
- Inform MPR Sand of areas of concern identified during the inspection.

Facility Walkthrough

USEPA staff began the Facility walkthrough at 12:16 p.m. EST and made the following observations, further documented in the Photograph Log (attached):

- The metal walls used to retain sediment and sand in the Supply Area are not sufficiently preventing stormwater, sand, and sediment from entering the Ohio River (Photos 2 – 5). Holes in the retaining wall are seen at a height lower than the retained sand and stormwater, allowing for a discharge of stormwater, sand, and sediment through the wall and into the Ohio River (Photo 3). Similar deficiencies are seen in the corners between the metal parts of the retaining walls (Photo 4). Sand and sediment have accumulated behind the retaining walls, to the extent that it has filled up behind the wall, and is overflowing into the Ohio River (Photo 5).

- Sand, sediment, and stormwater have also accumulated behind the walls of the Harbor Area up to the same height as the wall (Photos 6 – 8). Sand and sediment are evident on the top surface of the harbor wall, directly above the Ohio River (Photo 8).
- Stormwater is collected in two catch basins beside the sand loading station (Photos 13 and 14) and is discharged to the Ohio River through a permanently installed pipe (Photo 10).
- A channel of stormwater runoff, sand, and sediment, which leads into the Ohio River, is evident at the north boundary of the Harbor Area (Photo 11).

The Facility walkthrough tour ended at 1:38 p.m. EST.

Records Review

Since MPR Sand does not have an NPDES permit and does not conduct any monitoring, self-inspections, or sampling for their stormwater runoff or stormwater control mechanisms, a records review was not part of this inspection.

Closing Conference

The closing conference began at 1:38 p.m. EST. USEPA staff discussed the following with Mr. Brown during the closing conference:

- Stormwater and sediment are not being completely contained within the site, and are entering the Ohio River from the Supply Area and Harbor Area; and
- USEPA confirmed that no information collected during the inspection was considered Confidential Business Information.

USEPA concluded the inspection and left the Facility at 1:50 p.m. EST.

MPR Sand Terminals, LLC
EPA Inspection February 22, 2023
All photos taken by Jake Berger, Physical Scientist, U.S. EPA
Camera: Olympus Tough TG-6



1: P2220027

Description: Overview of supply area

Location: Supply area

Camera Direction: North

Date/Time: 2/22/2023 – 12:34 p.m. EST



2: P2220028

Description: Sand accumulation in supply area

Location: Supply area

Camera Direction: East

Date/Time: 2/22/2023 – 12:37 p.m. EST



3: P2220029

Description: Seepage from the near top of the sediment/sand retaining wall, actively discharging stormwater into the Ohio River

Location: Supply area

Camera Direction: South

Date/Time: 2/22/2023 – 12:40 p.m. EST



4: P2220030

Description: Stormwater runoff exiting through the corner of the sediment/sand retaining wall into the Ohio River

Location: Supply area

Camera Direction: East

Date/Time: 2/22/2023 – 12:41 p.m. EST



5: P2220031

Description: Sand overflowing the edge of the retaining wall into the Ohio River

Location: Supply area

Camera Direction: North

Date/Time: 2/22/2023 – 12:42 p.m. EST



6: P2220032

Description: Poned stormwater runoff and sand next to the Ohio River

Location: Harbor area

Camera Direction: North

Date/Time: 2/22/2023 – 12:44 p.m. EST



7: P2220033

Description: Poned stormwater and sand next to the Ohio River

Location: Harbor area

Camera Direction: North

Date/Time: 2/22/2023 – 12:47 p.m. EST



8: P2220034

Description: Sand on top of the harbor wall on the Ohio River

Location: Harbor area

Camera Direction: North

Date/Time: 2/22/2023 – 12:54 p.m. EST



9: P2220035

Description: Double walled fuel tank

Location: Sand unloading conveyor system

Camera Direction: South

Date/Time: 2/22/2023 – 1:06 p.m. EST



10: P2220036

Description: Black pipe discharging stormwater into the Ohio River

Location: North end of harbor area

Camera Direction: East

Date/Time: 2/22/2023 – 1:08 p.m. EST



11: P2220037

Description: Runoff channel flowing around the north boundary wall of the harbor area

Location: North end of harbor area

Camera Direction: East

Date/Time: 2/22/2023 – 1:09 p.m. EST



12: P2220038

Description: Drainage pipe below the sand waste pile

Location: Sand loading station

Camera Direction: Northwest

Date/Time: 2/22/2023 – 1:14 p.m. EST



13: P2220039

Description: Catch basin with opening covered by orange dandy bag, south of the truck filling station. Drains to the black discharging pipe in Photo 10.

Location: Sand loading station

Camera Direction: West

Date/Time: 2/22/2023 – 1:16 p.m. EST



14: P2220040

Description: Catch basin with opening covered by orange dandy bag, north of the truck filling station. Drains to the black discharging pipe in Photo 10.

Location: Sand loading station

Camera Direction: West

Date/Time: 2/22/2023 – 1:16 p.m. EST



15: P2220041

Description: Inside of sand storage warehouse

Location: Sand warehouse

Camera Direction: East

Date/Time: 2/22/2023 – 1:21 p.m. EST



16: P2220042

Description: Drain next to the sand warehouse. Drains to the ditch north of the property and into the Ohio River.

Location: Next to sand storage warehouse

Camera Direction: East

Date/Time: 2/22/2023 – 1:23 p.m. EST