



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 30, 2011

RE: ELYRIA CONCRETE INC
3GR01249*DG
STORMWATER
LORAIN

Mr. Greg Elrick
Elyria Concrete, Inc.
400 Lowell Street
Elyria, OH 44035

Dear Mr. Elrick:

On June 27, 2011 this writer conducted an inspection of your facility, located at 400 Lowell Street, Elyria, Ohio, to determine compliance with your Industrial General Storm Water NPDES permit referenced above. Along with my observations from the inspection I have provided comments concerning your permit below:

General:

1. This site is the location of Elyria Concrete, Inc., an operation that mixes aggregates, water, cement, fly ash, and other admixtures to produce ready mixed concrete which is hauled off-site to construction projects.
2. Storm water discharges to the rear of the property or collects in an off-site pond with no natural outlet.

Inspection Observations:

1. While walking around the outside of the building I noticed a few areas of concern. There were some oil stains on the cement where trucks were parked. Drip pans should be used for any leaky vehicles and any spills should be cleaned up using absorbent material.
2. On the south side of the facility against the fence to the east there was a small off ground oil tank. This tank should be put within secondary confinement of a containment tray or bermed pad.
3. The northern washout pit empties to a storm drain on the southeast corner of the pit (Figure 1). Catch basins north of this drain were releasing non-storm water discharges from the washout process and had some settling of pollutants and murky water from the pit. This is not acceptable. Only pure storm water may be discharged to the storm water system, therefore, the water from the washout pit may not be released to the storm water drain. The storm drain the pit empties into should be capped and waste water should be disposed of properly through collection or connection to sanitary sewer.
4. A trench drain by the loading area had a lot of water sitting in the drain indicating that particles from the loading process had probably clogged the drain. This drain must be cleaned out and should be covered during the loading process to prevent such particles from entering the storm system. As an alternative, a valve can be installed on the drain to close it off during the loading process and good housekeeping practices can be implemented to monitor and clean out the drain regularly.

5. Two trench drains were located inside the maintenance building. I was told these drains were thought to go to storm sewer. If these drains do run to storm sewer, they must be permanently capped to prevent pollutants from maintenance activities from entering the storm sewer system.
6. Outside of the maintenance building there was an area where some open drums, a tote, and 2 small open containers of various liquids were left outside (Figure 2). Staining running towards the storm drain nearby indicated that some of these liquids have leaked and entered the storm system. All containers should be kept inside. If they are left outside, they should be closed and on a containment tray or bermed pad, preferably under cover, and moved further from the storm drain. This area should be monitored frequently for leakage.

Permit:

1. As required in part D.1. of part IV of the permit, a Pollution Prevention Team must be assembled and included in the Storm Water Pollution Prevention Plan (SWPPP).
2. As required in part D.2.a.1 of part IV of the permit, a site map must be included in the SWPPP. This map must include:
 - a. A facility plan view identifying buildings.
 - b. Identification of local streams, lakes, ditches, waterways, and stormsewers.
 - c. Identification of stormwater control ponds and structures.
 - d. Identification of all stormwater outfall location points with designated number (e.g.: 002, 002, etc.).
 - e. Overall drainage patterns.
 - f. Location of all stormsewers and sanitary sewers with direction of flow.
 - g. Location of potential sources of pollutants such as tank farms, raw material storage, waste material storage, dumpsters, loading/unloading docks, air pollution control equipment (e.g.: bag houses, exhaust fans). List should include any outside sources whether isolated or not.
 - h. Potential sources of pollutants clearly identified on plan or by use of key.
 - i. Identify hardscape such as parking lots and landscape such as grass or other land use.
 - j. Truck and railway lines.
 - k. Site acreage with estimate of impervious surface vs. pervious service.
3. As required in paragraph D.3.e. of part IV of the permit, employee training programs must be conducted periodically. Records of these training sessions should be kept with the SWPPP.
4. As required in paragraph D.4. of part IV of the permit, Comprehensive Site Compliance Evaluations must be conducted by qualified personnel at appropriate intervals specified in the SWPPP and no less than once a year. Records of this inspection should be kept with the plan. This evaluation should provide:
 - a. Visual inspections for evidence of or the potential for pollutants to enter the drainage system from material handling areas and other potential sources of pollution identified in the SWPPP.
 - b. Observations to ensure that structural storm water management measures, sediment and control measures, and other structural pollution prevention measures identified in the SWPPP are operating correctly.

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- c. A visual inspection of equipment needed to implement the plan, such as spill response equipment.
5. As required in paragraph D.3.g. of part IV of the permit, the SWPPP should include a Non-Storm Water Discharges Certification stating that the discharge has been tested or evaluated (this does not necessarily require discharge sampling) for the presence of non-storm water discharges. The certification must include:
 - a. The identification of potential significant sources of non-storm water at the site.
 - b. A description of the results of any test and/or evaluation for the presence of non-storm water discharges.
 - c. The evaluation criteria or testing method used, the date of any testing and/or evaluation.
 - d. The on-site drainage points that were directly observed during the test.

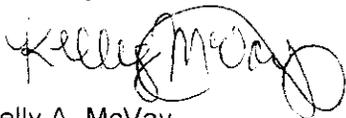
Action Items

- Clean oil stains and adopt the practice of using drip pans.
- Provide secondary containment for small off ground oil tank on south side.
- Discontinue discharging washout pit to storm sewer and plug the drain the pit is currently discharging to.
- Plug trench drains in the maintenance building.
- Provide secondary containment for liquids in totes, drums, and buckets which are currently outdoors.
- Make aforementioned improvements to SWPPP.

You are directed to provide me with a letter of response indicating the actions you will take to address the concerns and violations noted above. Please provide me with a letter of response no later than July 15, 2011.

If you should have any questions concerning this letter, feel free to contact this writer at (330) 963-1125 or by email at kelly.mcvay@epa.ohio.gov.

Sincerely,



Kelly A. McVay
Assistant to the District Engineer
Division of Surface Water

KAM/mt

cc: Mokund Moghe, Engineer and Storm Water Program Coordinator, City of Elyria



Figure 1: Wash out pit emptying to storm drain at top left corner.



Figure 2a: Tote and drums with open spouts sitting outside. Staining is apparent.



Figure 2b: Two open containers sitting outside.



Figure 2c: Staining indicating some pollutants from this outside storage area have made their way to the storm drain just right of this photo.