



**Environmental
Protection Agency**

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

August 28, 2012

Mr. Jason Fraley
Sardinia Concrete Company
911 U. S. Route 50
Milford, OH 45150

RE: Industrial Storm Water Site Inspection, NPDES Permit #1GR01076*EG

Dear Mr. Fraley:

On Monday, August 20, 2012, I inspected Sardinia Concrete's Milford plant to determine compliance with its Industrial Storm Water Discharge Permit. You represented the facility during this review.

Based on my observations of the facility's operations, the company appears to be in substantial compliance with the terms of its general Industrial Storm Water Discharge Permit. Precipitation that lands on the property near where concrete is mixed is diverted to pond #1, in to which returning trucks are also washed out. Accumulated concrete is periodically removed from this pond by another company that crushes the material and sells it for use as fill. Water is diverted from pond 1 into a smaller basin (pond 2), where it stays because of the lack of a piped outlet. Only during times of heavy rain will water overtop the banks of this second pond. The channel leading from pond 1 to pond 2 is typically cleaned out every month or so, depending on the amount of activity at the plant.

Requirements imposed by the recently revised "Multi-Sector General Permit" (MSGP) issued to industrial sites include the preparation of a Storm Water Pollution Prevention Plan (SWP3). This plan explains the basics of the company's operation, what potential pollutant sources are present on the property, and how off-site loss of pollutants in storm water runoff is minimized. A key part of the plan is a site map that shows the location of pollutant sources and the directions in which runoff moves.

For the company to be fully compliant with current Industrial Storm Water Management Regulations, an accurate and up to date SWP3 is supposed to be present on the site and made available upon request. The content of an SWP3 is detailed in the permit on pages 22 and 23.

Note that under the new MSGP concrete plants (which are in Sector E) are required to perform "quarterly visual assessments" of runoff that leaves their property (see page 19 of the permit for details). This requirement involves obtaining a sample of runoff at the point where it leaves the property and recording observations about its clarity, odor, color, if floating or settled solids are present, and several other things. This information is required to be documented, but does not have to be submitted to Ohio EPA.

Concrete plants are also required to perform "benchmark" monitoring of runoff, which involves analyzing samples of runoff to determine the levels of "total suspended solids" (TSS). Samples of runoff being discharged from the property are to be collected four times over the first three years of the permit's five-year term, (which began January 1, 2012). One sampling event is to take place in the fall, winter, spring and summer within this three-year period. Analytical results

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from the four sampling events are to be averaged and compared to the prescribed benchmark level of 100 milligrams per liter (mg/l). If the average amount of TSS in the four samples is below this 100 mg/l level, then the company can confirm that its practices for controlling dissolved solids at the site are adequate.

Data obtained from analysis of benchmark samples is required to be sent to Ohio EPA through its electronic data management system (known as eDMR). Questions about how to set up an eDMR account can be directed to Mr. Jamie Roberts in OEPA's Central Office. His direct line is (614) 644-2054, or you can email him at Jamie.Roberts@epa.ohio.gov.

Other requirements in the permit to be mindful of include inspections (section 4, p 17), and reporting and recordkeeping (section 7, pp 33-35). Details concerning monitoring procedures are in section 6, beginning on page 28 of the permit.

Please provide a copy of the site's SWP3 within 60 days of receipt of this letter. If you'd like to send draft versions of the plan for me to review to ensure the plan is on the right track, feel free to email the document to the address shown on my business card.

If you have any questions related to this inspection, I can be contacted at 937.285.6442, or via email at chris.cotton@epa.ohio.gov.

Sincerely,



Chris Cotton
Environmental Specialist II
Division of Surface Water

Enclosure

CC/ca