



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

June 17, 2013

Ms. Linda Ernst
Piqua Concrete Company
8395 North Piqua Lockington Road
Piqua, Ohio 45356

RE: Piqua Concrete (NPDES # 1GR00066*EG) Reconnaissance Inspection / Notice of Violation.

Dear Ms. Ernst:

On May 23, 2013, a representative of the Ohio EPA Southwest District Office conducted a Reconnaissance Inspection at the Piqua Concrete plants located at 555 Old Springfield Road, Vandalia, and 8395 North Piqua Lockington Road, Piqua. The inspections were conducted as part of a compliance review of the facility with respect to the terms and conditions of the facilities National Pollutant Discharge Elimination System (NPDES) permit and storm water program.

In accordance with Ohio Administrative Code (OAC) 3745-33-02 (A), "Ohio NPDES Permit Required", the storm water discharge from the Piqua Lockington Road plant must receive NPDES permit coverage. This discharge is currently in violation of OAC 3745-33-02. A complete Notice of Intent (NOI, see attached) form will need to be submitted for this discharge (see "Items Requiring a Response", Item 2).

The findings from this inspection are included in the attached report. There are two items that require a response. Please respond to these items by no later than July 15, 2013.

If you have any questions regarding the report, you may contact Joe Reynolds at (937) 285-6097.

Sincerely,

Martyn G. Burt
Division of Surface Water

MB/kb

Enclosure

Piqua Concrete
Inspection Findings
Old Springfield Street Plant
1GR00066*EG

On June 3, 2013, a Reconnaissance Inspection was conducted at the Piqua Concrete plant, 555 Old Springfield Road, Vandalia Ohio. The inspection was conducted as part of the compliance review for National Pollutant Discharge Elimination System (NPDES) permit 1GR00066*EG. This facility is located on the Phillips Company site. Phillips Companies currently holds NPDES permit number 1IJ00063*BD (effective 9/1/2011, exp. 1/31/2015).

Piqua Concrete operates a concrete plant at the site. They lease the property from Phillips Companies. All of their storm water is directed into a storm water retention basin that is maintained by Phillips Companies. Piqua Concrete has applied for and received general permit coverage for their operations at the site. They do not have a Storm Water Pollution Prevention Plan (SWPPP) for the site. Phillips Companies is responsible for maintaining the storm water controls, and doing the inspections and sampling.

Exposed materials at the site include aggregate piles, mechanical systems (conveyors, hoppers, concrete plant, etc.) and heavy equipment (dredge, front end loader, concrete trucks). Concrete truck and plant wash water is discharged to a storm water retention pond. There are several ponds in series that ultimately discharge to the Stillwater River.

This site is currently covered by two storm water permits. Piqua Concrete maintains NPDES 1GR00066*EG. Phillips Companies maintains NPDES permit 1IJ00063*BD. The NPDES storm water permitting requirements for the site can be covered under one permit, provided the coverage encompasses all activities at the site. In this instance, the permit holder must provide storm water oversight (per the requirements of the sites SWPPP) for both the aggregate mining operations and concrete making activities at the site.

Industrial Storm Water Reconnaissance Inspection

Name of facility; Piqua Concrete Company

Address; 555 Old Springfield Road

Permit number; 1GR00066*EG Applicable permit sector; E2, Concrete

Date of visit; June 3, 2013 Time started; 10:00 AM Time ended; 10:10 AM

Facility representative(s); Contacted at Piqua site.

OEPA inspector; Joe Reynolds

SWP3:

- | | |
|--|---|
| A. Did the facility representative produce a SWP3? | N |
| A1. Did it include a site map? | N |
| A2. Did it include schedules and procedures for the quarterly routine facility inspections? | N |
| A3. Did it include schedules and procedures for the comprehensive annual facility inspection? | N |
| A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges? | N |
| A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? | N |

Comments;

See attached report:

Inspection records:

- | | |
|---------------------------------------|---|
| B. Were inspection records available? | N |
|---------------------------------------|---|

Comments:

Site Observations:

- C. Are materials stored exposed to weather? Y
If Yes, list materials.
- D. Are there any structural storm water management practices used onsite? Examples include grassed swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence, rain gardens. Y
- E. Number of outfalls from site/number inspected: 1 / 0
- G. Did any show evidence of pollutants discharged in the storm water? NE
If yes, describe;
- H. Other observations/comments; See attached report.

Piqua Concrete
Inspection Findings
N. Piqua – Lockington Road Plant

Piqua Concrete also operates a concrete plant at 8395 N. Piqua Lockington Road. This site is owned by the Piqua Concrete. There is no aggregate mining occurring at this site. Aggregate is trucked in to support concrete production. Currently there is no storm water permit coverage for the site.

Structures at the site include a concrete plant, aggregate hopper and conveyor, fuel island, and office. Concrete wash out occurs in a pit next to the office. The hydrogeology in the area allows this water to rapidly infiltrate into the ground. Residual materials from the washout pit are reclaimed to make block.

Rain water run-off from the site is limited because of the rapid infiltration that occurs. The site is contoured to bring storm water to a point discharge next to the hopper. A sump below the hopper also discharges at this location. There were no signs of contaminants leaving the site at this location.

Items Requiring a Response

1. With regard to the Vandalia plant, Piqua Concrete will need to determine if the Phillips Company Storm Water Pollution Prevention Plan encompasses the activities at the concrete plant (both inspection and bench mark sampling). If they provide this coverage then Piqua Concrete can file a Notice of Termination (NOT Form, see attached) in order to have the Piqua Concrete general permit withdrawn. If this is not the case then Piqua Concrete will need to maintain their general storm water permit coverage. A written response (including NOT form, as deemed appropriate) detailing Piqua Concrete's intention with respect to storm water permitting at this site must be submitted by no later than July 15, 2013.
2. With regard to the Piqua plant, a Notice of Intent (NOI, see attached) form for general storm water permit coverage must be submitted to the Ohio EPA, Central Office, in order to provide storm water permit coverage for this site. As part of this coverage, a Storm Water Pollution Prevention Plan (SWPPP, see attached guide) will need to be developed for all permitted sites. A complete NOI form must be submitted to Ohio EPA by no later than July 15, 2013.

Industrial Storm Water Reconnaissance Inspection

Name of facility; Piqua Concrete Company

Address; 8395 N. Piqua - Lockington Road, Piqua, Ohio 45356

Permit number; No permit currently

Applicable permit sector; E2, Concrete

Date of visit; June 3, 2013

Time started; 10:45 AM

Time ended; 11:30 AM

Facility representative(s); Linda Ernst

OEPA inspector; Joe Reynolds

SWP3;

- | | |
|--|---|
| A. Did the facility representative produce a SWP3? | N |
| A1. Did it include a site map? | N |
| A2. Did it include schedules and procedures for the quarterly routine facility inspections? | N |
| A3. Did it include schedules and procedures for the comprehensive annual facility inspection? | N |
| A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges? | N |
| A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? | N |

Comments;

See attached report.

Inspection records:

- | | |
|---------------------------------------|---|
| B. Were inspection records available? | N |
|---------------------------------------|---|

Comments:

Site Observations:

- C. Are materials stored exposed to weather? Y
If Yes, list materials.
- D. Are there any structural storm water management practices used onsite? Examples include grassed swales, permeable pavement, inlet filters, detention ponds, engineered wetlands, mulch berms, silt fence, rain gardens. Y
- E. Number of outfalls from site/number inspected: 1 / 1
- G. Did any show evidence of pollutants discharged in the storm water? N
If yes, describe;
- H. Other observations/comments; See attached report.