



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

October 8, 2013

**RE: Bryce Hill, Inc. – Springfield Facility
Storm Water Compliance Inspection**

Mr. Kent Sherry
Bryce Hill, Inc.
P.O. Box 1043
Springfield, Ohio 45501

Dear Mr. Sherry:

On October 4th, I met with you to conduct an unannounced inspection to evaluate Bryce Hill's efforts to control storm water runoff from its operations at 2301 Sheridan Avenue. The inspection included observation of the sedimentation basin, the wash-out pad and waste piles. The waste piles were much smaller than they were observed earlier this year.

A quick review of your recently updated (September 27, 2013) storm water pollution prevention plan (SWP3) showed that you have developed a good site plan and that regular site inspections are being performed.

Because of the limited amount of space at your facility, I believe it is important to minimize the amount of waste material kept on-site. Material removed from the wash-out basins and sedimentation basin should be protected from exposure to precipitation as much as possible, and removed as soon as possible.

The site exhibited a significant amount of fines on the pavement areas of the loading, unloading and wash-out areas of the facility. These fines could be washing down from up-gradient graveled areas but they appeared to be related largely to cement operations.

Please note that your storm water permit requires you to:

“Practice good housekeeping to prevent or minimize the discharge of spilled cement, aggregate (including sand or gravel), kiln dust, fly ash, settled dust, or other significant material in storm water from paved portions of the site that are exposed to storm water.”; and to

“Consider sweeping regularly or using other equivalent measures to minimize the presence of these materials.”

I encourage you to look for opportunities to minimize exposure of dust and fines to storm water to avoid them being entrained in run-off and not captured by the sedimentation basin during heavy rainfall events.

Compliance monitoring you performed on June 6, 2013 was reported on July 18th. Please note that results are to be reported for the month and day that the sample was collected. Also, the reported total suspended solids result was 0.001 mg/l with a note indicating the analytical value was below detection. Results that are below detection should be reported with reporting code 'AA'. You will be prompted to enter the detection limit which, for total suspended solids, is typically around 1 mg/l.

Also, although you reported a result for total suspended solids, you did not report a result for pH, as required by the permit. Please explain how and when you plan to address this requirement.

Please provide a written response to this letter by November 1, 2013, indicating your plans for addressing the items I have presented. If you have any questions about this letter or the attached inspection form, please call me at (937) 285-6095.

Sincerely,



Matt Walbridge
Environmental Specialist
Division of Surface Water

MW/tb

ATTACHMENT

Industrial Storm Water Reconnaissance Inspection Report

Name of facility: *Bryce Hill Inc.*

Address: *2301 Sheridan Ave
Springfield, OH 45501*

Permit number: *1GR01348*EG*

Applicable permit sector: *E2
(based on their SIC code 3273 - Ready-Mixed Concrete)*

Date of visit: *October 4, 2013* Time started: *11:00* Time ended: *11:45*

Facility representative(s): *Kent Sherry*

OEPA inspector: *Matt Walbridge*

SWP3:

- A. Did the facility representative produce an SWP3? **Y / ~~N~~ / Not requested**
- A1. Did it include a site map? **Y / ~~N~~**
- A2. Did it include schedules and procedures for the quarterly routine facility inspections? **Y / ~~N~~**
- A3. Did it include schedules and procedures for the comprehensive annual facility inspection? **Y / ~~N~~**
- A4. Did it include schedules and procedures for the quarterly visual assessment of storm water discharges? **Y / ~~N~~**
- A5. If benchmark monitoring is required, does the SWP3 describe how and when that will be done? **Y / ~~N~~ / NA**

Comments:

A. The plan covers several facilities

A1. Good maps.

A4. They use a clear plastic cylinder to collect quarterly visual samples from the outfall.

Inspection records:

- B. Were inspection records available? **Y / ~~N~~**

Comments:

Looked good. Records for all Bryce Hill's facilities are kept together.

Site Observations:

- C. Are materials stored exposed to weather? Y / ~~N~~
If Yes, list materials.

Cement dust and waste cement. The large piles of waste cement observed in a previous inspection were much smaller.

- 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 / ~~N~~ / ~~Not sure~~

There is a narrow, shallow, multi-celled pond for settling with the discharge at the fence line.

Cement truck wash-out water flows into a sedimentation/recycle system - although it appeared that water escapes this system. There appeared to be attempts to capture and segregate storm water from process water, but there is a lot of comingling upstream of the facility's one outfall.

- E. Number of outfalls from site/number inspected: 1 / 1

- F. Did any show evidence of pollutants discharged in the storm water? Y / ~~N~~

If yes, describe:

Although it was difficult to tell because the ditch didn't have much flow and it appears that there is a lot of railroad ballast for the water to disappear into.

- G. Other observations/comments:

1. The sedimentation pond seems too small.

2. It was difficult to tell what was stormwater runoff and what was process water.

3. Their permit requires them to include the following in their SWP3:

- With good housekeeping, prevent or minimize the discharge of spilled cement, aggregate (including sand or gravel), kiln dust, fly ash, settled dust, or other significant material in storm water from paved portions of the site that are exposed to storm water.***

Consider sweeping regularly or using other equivalent measures to minimize the presence of these materials. Indicate in your SWPPP the frequency of sweeping or equivalent measures.

- *Prevent the exposure of fine granular solids (cement, fly ash, kiln dust, etc.) to storm water, where practicable, by storing these materials in enclosed silos, hoppers, or buildings, or under other covering.*

Their SWP3 is required to include the following:

- *Drainage Area Site Map showing the locations of the following, as applicable: bag house or other dust control device; recycle/sedimentation pond, clarifier, or other device used for the treatment of process wastewater; and the areas that drain to the treatment device.*
- *Include in the non-storm water discharge certification a description of measures that ensure that process waste waters resulting from washing trucks, mixers, transport buckets, forms, or other equipment are discharged in accordance with NPDES requirements or are recycled.*

They are also subject to the following Effluent Limitations Guidelines (w/ annual monitoring):

*Total Suspended Solids (TSS) - 50 mg/L, daily maximum
pH - 6.5 - 9.0 s.u.*

Compliance is determined based on discharges from material storage piles at cement manufacturing facilities independent of commingling with any other wastestreams that may be covered under the permit.

Bryce Hill has reported the following monitoring results:

TSS monitoring on June 6, 2013 (but reported on July 18th) was reported 0.001 mg/l with an indication that the results were below detection. There was no pH monitoring result.