

**HAZARDOUS WASTE SECTION - COMPLIANCE BRANCH
FILE TRANSMITTAL & DATA ENTRY FORM**

Your Name: Bobby Nelms

Facility ID Number: NCS000002307

Facility Name: S&W Ready Mix Concrete

Document Group: Inspection/Investigation (I)

Document Type: I - Compliance Evaluation Inspection (CEI)

File Description/Comments: Multimedia, No Violations

Date of Document: 4/13/2016

Author(s) of Document: Bobby Nelms

Inspector ID #: NC036

Suborganization: Eastern Region

County (if not on report): Brunswick

**STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WASTE MANAGEMENT
HAZARDOUS WASTE SECTION**

COMPLIANCE EVALUATION INSPECTION REPORT

1. FACILITY INFORMATION:

Facility Name: S&W Ready Mix Concrete

EPA ID Number: NCS000002307

Status of Facility: CESQG

Facility Location: 150 Landfill Road, Bolivia, NC 28422

County: Brunswick

Telephone Number: (910) 253-7588

2. FACILITY CONTACT: Hank Gay

3. INSPECTION PARTICIPANTS: Hank Gay - S&W, Trentt James and Brian Lambe - DEMLR, Ashby Armistead and Scott Sanders - DAQ, Tom Tharrington - DWR, and Bobby Nelms - DWM

4. DATE OF INSPECTION: April 13, 2016

5. DATE OF LAST INSPECTION: Never inspected by DWM

6. PURPOSE OF INSPECTION: Unannounced audit to determine compliance with regulations described at 40 CFR 261, 262, 265, 268, 273 and 279.

7. FACILITY DESCRIPTION: The Bolivia plant has the ability to produce 80 yards of concrete per day and runs four trucks. The facility has a 10,000 gallon diesel fuel tank and a small tank farm (eight tanks) which supply additives to the concrete.

Distance to closest residence: Approximately ½ mile

Distance to closest off-site well(s): located at the landfill – approximately 500 meters

Water supply: Municipal

Description of wells on-site: None

Sewage: Municipal

Operating shifts: One shift five days/week

Number of employees: Three

Size of facility:

7. WASTE STREAMS INCLUDE:

Hazardous waste streams include – None

Non-hazardous waste streams include – Universal waste lamps

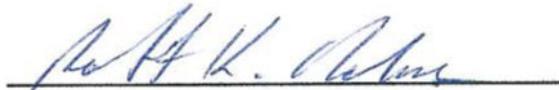
Non-RCRA regulated waste streams include – None

8. AREAS OF REVIEW AND INSPECTION:

- **Manifests:** N/A
- **Satellite Accumulation Areas:** N/A
- **Storage Areas:** N/A
- **Universal Waste:** The facility occasionally generates used lamps. There were none on site during the inspection but I informed Mr. Gay of the rules regarding containerizing, labeling, and dating of the used lamps. Mr. Gay said that in the past lamps had been properly sent off for recycling and that they were not disposed.
- **Used Oil:** None. All maintenance is done at the central facility in Clinton.

9. SITE DEFICIENCIES: None observed.

10. RECOMMENDATIONS/COMMENTS/ACTION ITEMS: None



Robert K. Nelms
Environmental Senior Specialist, NCDEQ

Date: April 21, 2016



PAT MCCRORY
Governor

DONALD R. VAN DER VAART
Secretary

April 18, 2016

MR. HANK GAY
S & W READY MIX
PO BOX 872
CLINTON, NC 28329

Subject: **Multimedia
Compliance
Inspection**
S & W Ready Mix –
Bolivia Plant
Brunswick County

Dear Permittee:

Department of Environment and Natural Resources staff conducted a multimedia compliance inspection of S & W Ready Mix – Southport Plant on April 13, 2016 for permitted and/or other activities administered by the following Divisions:

Division of Air Quality(DAQ)	Division of Energy, Mineral, and Land Resources (DEMLR) NCG140277	Division of Water Resources (DWR)	Division of Waste Management (DWM)
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We hope that you have enjoyed the benefit of our initiative to provide a single inspector capable of handling multiple areas of environmental compliance at your facility. The results of each applicable inspection area and any associated response actions or necessary corrective measures are detailed in the Division specific areas of the attached report. If there are no notes or comments under each Division header, you may assume compliance with that particular Division’s rules and regulations at the time of inspection. Should violations be noted in the attached report, you may receive separate enforcement related correspondence in addition to this report.

If you have any questions regarding this multimedia inspection, please contact the Wilmington Regional Office at (910) 796-7215 and ask to speak with the appropriate staff. Thank you for your cooperation.

Encl: NPDES Stormwater Inspection Report

cc: All applicable Division Supervisors

- DAQ WIRO Files
- DEMLR WIRO Files
- DWR WIRO Files
- DWM WIRO Files

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Inspection Report
Date: 04/20/2016

Wilmington Regional Office
S & W Ready Mix Concrete Co. - Bolivia
NC Facility ID 1000098
County/FIPS: Brunswick/019

Facility Data	Permit Data
S & W Ready Mix Concrete Co. – Bolivia 150 Landfill Road NE Bolivia, NC 28422 Lat: 34d 2.5895m Long: 78d 15.2082m SIC: 3273 / Ready-Mixed Concrete NAICS: 32732 / Ready-Mix Concrete Manufacturing	Permit 08825 / R03 Issued 8/12/2015 Expires 7/31/2023 Classification Small Permit Status Active Current Permit Application(s) None

Contact Data			Program Applicability SIP
Facility Contact	Authorized Contact	Technical Contact	
Keith Braun Plant Manager (910) 253-7588	Hank Gay Environmental Director (910) 284-2664	Hank Gay Environmental Director (910) 284-2664	

<p>Comments: Inspect facility as scheduled.</p> <p>Inspector's Signature: Scott Sanders</p> <p>Date of Signature: 4/20/16</p>	Compliance Data
	<p>Inspection Date 04/13/2016 Inspector's Name Scott Sanders Operating Status Operating Compliance Code Compliance - inspection Action Code FCE On-Site Inspection Result Compliance</p>

Total Actual emissions in TONS/YEAR:							
	TSP	SO2	NOX	VOC	CO	PM10	* HAP
2014	3.63	---	---	---	---	1.10	---
2009	0.1400	---	---	---	---	0.0700	---

* Highest HAP Emitted (in pounds)

Five Year Violation History: None			
<u>Date</u>	<u>Letter Type</u>	<u>Rule Violated</u>	<u>Violation Resolution Date</u>

Performed Stack Tests since last FCE: None			
<u>Date</u>	<u>Test Results</u>	<u>Test Method(s)</u>	<u>Source(s) Tested</u>

Directions to the site are as follows: From Wilmington, take the US-17/Shallotte/Myrtle Beach exit onto Ocean Hwy. E (US-17 S). Go 20.6 miles. Take a right onto Galloway Road NE. Go for 380 feet and bear left onto Landfill Road NE. S & W Ready Mix Concrete is down on the right approximately one half mile.

1. Contact was made with Hank Gay, Environmental Director. A multi-media team inspection was performed. Team members consisted of Scott Sanders (DAQ), Ashby Armistead (DAQ), Brian Lambe (DEMLR), Trentt James (DEMLR), Tom Tharrington (DWR), and Robert Nelms (DWM).
2. S&W Ready Mix Concrete Company – Bolivia is a concrete batch plant that consists of one cement storage silo, one flyash silo, and one weigh hopper/batcher which supply cement and flyash to ready mix trucks for delivery. Fabric filters are installed on each silo. Also existing at the facility are several associated storage piles for sand and crushed aggregates.
3. The following equipment contained in Permit No. 8825R03:

One Concrete Batch Plant with a maximum rated capacity of 60-80 cubic yards per hour, with the following emissions points and control devices:			
Emission Source ID	Emission Source Description	Control System ID	Control System Description
ES-1	one cement storage silo	CD-1	one bagfilter (195 square feet of filter area)
ES-2	one flyash storage silo	CD-2	one bagfilter (195 square feet of filter area)
ES-3a	one weigh hopper/batcher	CD-3	one weigh hopper bagfilter with 38 square feet of filter area

4. Applicable regulations for S&W Ready Mix Concrete Co. – Bolivia are as follows:
 - 2D. 0202 “Permit Renewal and Emission Inventory Requirement”**
 - 2D. 0515 “Particulates from Miscellaneous Industrial Processes”**
 - 2D. 0521 “Control of Visible Emissions”**
 - 2D. 0535 “Excess Emissions Reporting and Malfunctions”**
 - 2D. 0540 “Particulates from Fugitive Dust Emission Sources”**
 - 2D. 0611 “Bagfilter Requirements”**
5. Hank Gay with S&W Ready Mix Concrete recently requested permit renewal for this facility. The Permittee did not request any changes or modifications for the renewed permit. The application was accompanied by the Emissions Inventory

Report for calendar year 2014 (attached). The receipt of the application was July 3, 2015. An acknowledgement letter was sent to Hank Gay on July 7, 2015 by Dean Carroll indicating the application package was complete on time. The permit was renewed on August 12, 2015.

6. The normal loading rate for the site is approximately eighty (80) yards of cement per day and four hundred (400) yards of cement per week. The facility operates five (5) days per week and currently runs four (4) delivery trucks out of this site.
7. The silos were not being filled at the time of the inspection. This facility receives approximately ten (10) loads of cement per month and approximately four (4) loads of flyash per month with an average process rate of twenty-five (25) tons per load per hour.
8. Maintenance is performed on the baghouses once a month. Maintenance records are kept on site for reference. All of the bagfilters in the flyash silo were changed out on November 10, 2015. All of the bagfilters in the cement silo were changed out on January 5, 2016. All of the bagfilters in the weigh hopper were last changed out on March 11, 2014. There are 16 bags in each of the silos and 5 small bags in the weigh hopper. A copy of the most recent maintenance records are attached.
9. This plant is one of only three batch mix plants out of 28 total the company owns that does not use a central dust collector to control particulate emissions from silo loading and truck loadout activities. The other two plants without a central dust collector are located in Whiteville and Clinton. A central dust collector is typically more efficient and easier to maintain. Hank Gay indicated that S&W might install a central dust collector at this location in the future.
10. The pneumatic pressure from the truck to the silos should be kept between eight (8) to twelve (12) pounds per square inch (psi). This amount of pressure will ensure that the bags in the baghouse will not burst due to a high delivery pressure from the truck. This facility operates their loading trucks at a delivery pressure no greater than ten (10) psi.
11. Fugitive dust from the premise and access roads is not a problem with this plant. The plant is located in a very rural area and near the county landfill. The plant entrance is covered with rock and part of the premise is paved with concrete. Trucks are cleaned with water as well. The property is sprayed with water by using mix trucks or the loader as needed.
12. Facility Total CY 2014 Emission Summary is as follows:

PM (TSP)	3.63 Tons
PM10	1.10 Tons
The facility produced 17,257 cubic yards of concrete in CY 2014.	

- 13. 5 year compliance history** – This facility has been in compliance with Air Quality regulations during this time period. There have been no (zero) notices of deficiency or violation issued to this facility during the past five (5) years.

- 14. S&W Ready Mix Concrete Co. – Bolivia** was operating in compliance with Air Quality regulations at the time of the inspection.

Inspection Summary:

The inspection team for the initial multimedia inspection program for the Wilmington Regional Office consisted of Thom Tharrington DWR, Scott Sanders DAQ, Ashby Armstead DAQ, Robert Nelms DWM, Trent James LQ, and Brian Lambe LQ. Met with Hank Gay, the environmental representative for S & W.

The site is generally well maintained. Additional work needs to be done on the berms as they should encompass the site, limiting discharge to the stormwater pond outlet. Stabilize berms once they are established on all sides.

All chemicals must be stored in secondary containment. Two detergent barrels were outside of secondary containment.

Records showed that the site has good sampling results. Sampling has occurred regularly.

The concrete washout should be cleaned out regularly as to maximize storage in the case of a significant rain event, preventing overflow.

The stormwater pond should be maintained. This entails cleaing the pond to designed depth. The pond seemed to be effective right now, but future plans should be made to muck out the bottom.

Maintain construction entrances.

Analytical Monitoring

Yes No NA NE

Has the facility conducted its Analytical monitoring?

Has the facility conducted its Analytical monitoring from Vehicle Maintenance areas?

Comment:

Permit and Outfalls

Yes No NA NE

Is a copy of the Permit and the Certificate of Coverage available at the site?

Were all outfalls observed during the inspection?

If the facility has representative outfall status, is it properly documented by the Division?

Has the facility evaluated all illicit (non stormwater) discharges?

Comment: Please limit discharge off site to the identified outfall. A berm should be build on the east side of the property to prevent sediment and concrete dust from leaving the site. The berm on the west side needs maintenance.

Qualitative Monitoring

Yes No NA NE

Has the facility conducted its Qualitative Monitoring semi-annually?

Comment:

Stormwater Pollution Prevention Plan

Yes No NA NE

Does the site have a Stormwater Pollution Prevention Plan?

Does the Plan include a General Location (USGS) map?

Does the Plan include a "Narrative Description of Practices"?

Does the Plan include a detailed site map including outfall locations and drainage areas?

Does the Plan include a list of significant spills occurring during the past 3 years?

Has the facility evaluated feasible alternatives to current practices?

Does the facility provide all necessary secondary containment?

Does the Plan include a BMP summary?

Does the Plan include a Spill Prevention and Response Plan (SPRP)?

Does the Plan include a Preventative Maintenance and Good Housekeeping Plan?

Does the facility provide and document Employee Training?

Does the Plan include a list of Responsible Party(s)?

Is the Plan reviewed and updated annually?

Does the Plan include a Stormwater Facility Inspection Program?

Has the Stormwater Pollution Prevention Plan been implemented?

Permit: NCG140277

Owner - Facility: S & W Ready Mix Concrete Company LLC

Inspection Date: 04/13/2016

Inspection Type : Compliance Evaluation

Reason for Visit: Routine

Stormwater Pollution Prevention Plan

Yes No NA NE

Comment: Please provide secondary containment for all chemicals stored onsite, in this case, the detergents should be stored in secondary containment.