



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
Division of Water Resources
Nashville Environmental Field Office
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August 1, 2018

Daniel Bugbee
Garrott Bros Inc.
PO Box 419
Gallatin, TN 37066

RE: Compliance Evaluation Inspection
Garrott Bros – Plant #5 (Eubanks Road)
NPDES TNG110427
Robertson County

Dear Mr. Bugbee,

On Friday, July 20, 2018, I performed a Compliance Evaluation Inspection (CEI) at the Irving Materials Inc. (IMI) Dickson plant to assess compliance with the National Pollutant Discharge Elimination System (NPDES) general Ready-Mix Concrete Plant (RMCP) Permit TNG110427. The Notice of Coverage (NOC) was issued to on November 13, 2017. The current RMCP General Permit expires in October, 2022.

On site I met with Mr. Andrew Rucker, Quality Control Manager. I would like to thank your personnel for their time and cooperation while I was on site for this inspection.

Permit and Records Review

A current copy of the NOC was posted in the office. A review of records indicates that there has been no discharge at this facility since the NOC was issued.

The permit requirement for a Stormwater Pollution Prevention Plan (SWPPP) was fulfilled by the Spill Prevention, Control, and Countermeasures (SPCC) Plan. The SPCC appeared to contain all the components required to be in the SWPPP. The SPCC included dates and names of personnel training.

There was no record of monthly or annual site inspections. Section 7.3.4 of the permit requires monthly inspections to of the site to observe all areas that may contribute to stormwater pollution. Additionally, Section 7.7 requires comprehensive annual inspections to insure that any

treatment processes are performing adequately, that best management practices are in place and functional, and should lay out any changes to either the site or SWPPP.

Site Review

This plant operates as a no-discharge system. As such there is no outfall structure for the sediment pond. There is not currently any treatment of truck washout water, and trucks wash out next to the retention pond. Mr. Rucker explained that there are plans to build sedimentation pits that will then discharge into the retention pond.

The site appeared to be well-graded with berms and cement block directing any stormwater to the retention pond. There was no water in the pond at the time of the inspection despite the recent increase in production. This facility is in a fairly low area and receives significant runoff from the surrounding fields despite diversion ditches. Garrott Brothers should consider reusing settled process water for production or truck wash in order to maintain low levels in the retention pond and be able to accommodate heavy rains without discharging.

Conclusions:

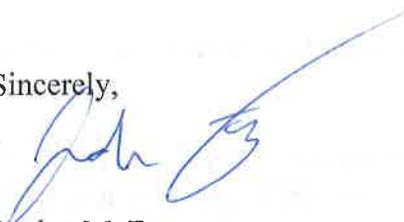
The site is well maintained and retention capacity appears sufficient. Though no treatment for process water is currently in place, there is no discharge. The SWPPP is organized and complete. There was no observable evidence of discharge and the retention pond appeared dry. Site inspections need to be recorded..

Action Items and Recommendations

Please begin recording site inspections. As a reminder, should there ever be a discharge of process water, that discharge is still subject to the monitoring requirements and limitations laid out in sections 4. and 5. of the permit and will need to be reported.

I would again like to thank Mr. Rucker for his courtesy and cooperation shown during the inspection. If you have any questions or need additional information, please contact me at 615-687-7114 or Jordan.Fey@tn.gov.

Sincerely,



Jordan M. Fey
Environmental Consultant
Division of Water Resources

e-copy: Sarah Elias, Division of Water Resources – Sarah.Elias@tn.gov
Andrew Rucker, QC Manager, Garrott Bros – arucker@garrottbros.com