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California Ready Mixed Concrete Producers Ask for Help

16/05/2005

California Ready Mixed Concrete Producers - **Ask for Help!**

(NRMCA) The California Regional Water Quality Control Board, Central Valley Region, is proposing severe regulatory measures that are extremely burdensome to area ready mixed concrete producers. If enacted, they would have to place impermeable liners under the entire site and install a leak detection system within a very short timeframe. Additionally, groundwater monitoring is required. Estimated initial cost for each plant is \$500,000 while the Board has not offered evidence that groundwater may be impaired.

NRMCA has been working closely with the Construction Materials Association of California (CMAC) to stop the aggressive and unnecessary actions of the Central Valley Board. Earnest efforts of the CMAC have been met with more restrictions and costs placed on producers. California producers and those from other areas are encouraged to write the Central Valley Regional Water Quality Control Board and voice their concerns. A sample letter is attached to this E-NEWS.

For more information, contact CMAC's Charley Rea at 1-916-554-1000 or by e-mail, clreacmac@sbcglobal.net

Sample Letter (copy and paste this into your own document):

May 13, 2005

Mr. Thomas R. Pinkos, Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, California 95670-6114

Re: Response to Draft General Waste Discharge Requirements Order for Ready Mix Concrete Process Water

Dear Mr. Pinkos,

The purpose of this letter is to respond to the Regional Board's recently proposed Draft General Waste Discharge Requirements Order (Order) for ready mix

May 13, 2005

Mr. Thomas R. Pinkos, Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, California 95670-6114

Re: **Response to Draft General Waste Discharge Requirements Order for Ready Mix Concrete Process Water**

Dear Mr. Pinkos,

The purpose of this letter is to respond to the Regional Board's recently proposed Draft General Waste Discharge Requirements Order (Order) for ready mix concrete process water, specifically:

1. To request that the Board delay adoption of the Order, and
2. To request that Board staff work with representatives of the ready mix and aggregate industries to develop a more reasonable approach to the management of ready mix process water and the runoff from returned and recycled concrete.

This letter represents a broad consensus of ready mix producers and aggregate facilities within the Central Valley and has been developed in cooperation with the Construction Materials Association of California (CMAC) and the National Ready Mix Concrete Association (NRMCA)...

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concrete process water, specifically:

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This letter represents a broad consensus of ready mix producers and aggregate facilities within the Central Valley and has been developed in cooperation with the Construction Materials Association of California (CMAC) and the National Ready Mix Concrete Association (NRMCA).

[XYZ READY MIX] is committed to environmentally responsible management of process water at our facilities in the Central Valley. However, for reasons described below, we feel that the Order, as proposed, represents an inappropriate mechanism to develop such compliance.

First, the financial and operational implications of complying with the draft Order, as proposed, are substantial. As an industry, we are only beginning to recognize the potential magnitude of these implications. A preliminary cost-to-compliance estimate for the engineering and infrastructure improvements required by the Order approximates \$500,000 per facility. This estimate does not include costs associated with the extensive and detailed application process nor with continuing operations, maintenance, and reporting as required in the Order. Costs of this magnitude will necessitate the closure of smaller plants for multi-facility operators and may force small independent operators out of business.

Second, the industries believe the detailed application process, the highly prescriptive design standards, and the intensive monitoring and reporting process to exceed those that would provide adequate protection of groundwater resources.

Third, the adoption of the Order, as proposed, would have significant cost implications for building materials supplied for public works projects, commercial and industrial developments, and residential construction.

Fourth, the adoption of the Order, as proposed, would negatively affect developing trends within the building materials, construction, and landfill industries for the use of recycled material. For example, the requirements for the management of runoff from recycled material stockpiles may make continued production of these materials economically unjustifiable, diverting perhaps millions of tons of potentially recyclable material to landfills.

Fifth, the adoption of the Order, as proposed, would have significant collateral implications, which include:

- **Increased Truck Traffic.** With the likely closure of some smaller ready mix facilities, the distances from remaining producing plants to some job sites would increase. In addition, if returned concrete is not processed into a recycled product, the hauling of returned concrete to landfills would also result in increased truck traffic.
- **Air Pollution.** Particulate and NOx emissions will increase due to the increased truck traffic.
- **Concrete Quality.** The increased travel times will result in a higher incidence of off-spec loads. The off-spec loads will be rejected, resulting in higher operating costs and further-increased truck traffic.
- **Recycled Material Use.** The supply of products manufactured from returned concrete (e.g., aggregate base) is likely to decrease as more facilities divert returned materials to landfills.
- **Material Costs.** The costs of ready mix concrete are likely to rise significantly as result of the application process, engineering, infrastructure improvements, operations, maintenance, reporting, returned concrete disposal costs, and decreased competition. The industries believe these costs will be felt throughout the regional economy.
- **Non-Compliance.** The industry believes that these substantial costs-to-compliance will be an incentive for some producers to evade compliance.

[XYZ READY MIX] wants to develop an approach towards process water management – and protection of groundwater resources – that is more cost-effective than that prescribed in the Order. [XYZ READY MIX] therefore requests that the Board provide opportunity for constructive interaction between the Board and the ready mix and aggregate industries, by which the industries can provide the Board with:

- A representative, detailed engineer's cost estimate of the costs to compliance.

- An evaluation of the operational effects of the Order, as proposed.
- A complete and representative characterization of ready mix process water.
- A characterization of the runoff from returned concrete and recycled materials.
- An evaluation of the permeability of a reinforced concrete sump system, with and without various waterproofing treatments.
- An evaluation of the potential environmental impacts associated with process-water runoff from (zero-head) tributary areas.

The end objective of these evaluations is to develop a library of data that will assist Board staff and the industries in cooperatively defining the type of water management system that will be cost effective and protective of groundwater.

To these ends, the industries commit to performing this work at our expense, with the scope of the work to be mutually agreed upon by Board staff and industry representatives.

In the meanwhile, so as not to waste time and money designing and implementing water management strategies that may indeed exceed the (yet-to-be-determined) design standards for effective water management systems, [XYZ READY MIX] requests a substantial delay in the adoption of the proposed Order. This delay will provide opportunity to develop the scope(s) of work, complete the evaluations, report on the results of the evaluations, and interact with Board staff on potential revisions to the Order.

[XYZ READY MIX] thanks you in advance for your careful consideration of these requests.

Sincerely,
[XYZ READY MIX]

Representative's Name
Representative's Title
cc: