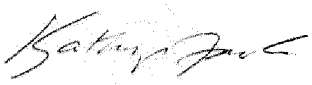


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1, ECAD-WCB
5 Post Office Square - Suite 100, Boston, MA 02109-3912

Clean Water Act (CWA) Inspection Report

Program: Industrial Stormwater	Inspection Type: Compliance Evaluation Inspection (CEI)	
Facility Name: Scrap Metals Inc.	NPDES/ICIS No.: (Unpermitted at time of inspection)	
Inspection Entry Date: November 3, 2022 Inspection Entry Time: 8:00 AM (EDT)	Inspection Exit Date: November 3, 2022 Inspection Exit Time: 9:00 AM (EDT)	
Facility Inspected: Scrap Metals Inc. 128 E Glenwood St, Nashua, New Hampshire 03060	Lat, Long: 42.733272°, -71.437708° NAICS / SIC Code: 5093 – Scrap and Waste Materials	
EPA Representative(s): None.		
State Representative(s): None.		
On-site Facility Representative(s): Ansel Grandmaison – Owner, (603) 396-6282, scrapmetals@yahoo.com Holly Bleu – Office Manager, (603) 396-6282, scrapmetals@yahoo.com		
Responsible Official: Ansel Grandmaison – Owner		
Name and Signature of Inspector Kate Forsmark – Contract Inspector, PG Environmental 	Phone Number/Email (720) 696-0935 Kate.Forsmark@pgenv.com	Date: 12/8/2022

INTRODUCTION:

On November 3, 2022, a U.S. Environmental Protection Agency (EPA) contractor, PG Environmental, conducted a Compliance Evaluation Inspection (CEI) at Central Auto Recyclers located in Nashua, New Hampshire, Hillsborough County (Facility). Ms. Kate Forsmark of PG Environmental (EPA Inspector) presented her Letter of Authorization to conduct inspections under the Clean Water Act (CWA) to the Owner, Ansel Grandmaison and Holly Bleu (hereinafter, the Facility representatives) upon arrival at the Facility and conducted an opening conference.

The EPA Inspector explained the purpose of the CEI was to assess the Facility's compliance status with respect to EPA's 2021 Industrial Stormwater Multi-Sector General Permit (MSGP). At the time of the inspection, the Facility did not have coverage under the 2021 MSGP. Facility representatives stated that they had not been previously contacted by the EPA and were unfamiliar with the EPA's MSGP.

The weather at the time of the inspection was sunny and approximately 60°F. According to precipitation data from the National Oceanic and Atmospheric Administration (NOAA), the Nashua, NH area did not receive any rainfall the day of the inspection or the day prior to the inspection.

ATTACHMENTS:

Appendix A – Photograph Log

FINDINGS AND OBSERVATIONS:

Facility Description

The Facility, owned by Ansel Grandmaison, is a scrap metal processing site for ferrous and non-ferrous metals, but also accepts other materials including compost, tires, and various materials classified as junk. Industrial activity associated with scrap metal recycling is classified under the Standard Industrial Classification (SIC) Code 5093 (Scrap and Waste Materials). According to the Facility representatives, the Facility began operations in 1971 and, at the time of the inspection, had a full-time staff of four (4).

The Facility comprises approximately eleven (11) acres with 1 to 2 acres in use for industrial activities located at the end of East Glenwood Street in the City of Nashua, Hillsborough County, New Hampshire (see attached aerial photo with approximate delineations of site and activities). The other 9 to 10 acres are woods. The Facility is bordered by woods to the north and south, a railroad to the west, and the Merrimack River to the east. The Facility includes an office, a building for sorting metals, materials storage, and vehicle maintenance, a shed holding flammable materials such as drums of waste oil, and exterior scrap materials storage piles scattered throughout the Facility (refer to Appendix A, Photographs 1 through 8).

The Facility accepts ferrous and non-ferrous metals from both commercial and public sources. Upon arrival, incoming loads of scrap metal pass over the truck scale and are visually inspected for prohibited or conditionally accepted materials at the gatehouse located at the East Glenwood Street entrance to the Facility. Prohibited materials include batteries, refrigerants, or items not drained of petroleum products. Unprocessed materials are piled within the fenced area in the northwest corner of the Facility. Materials which are found to still have fluids (i.e., petroleum, refrigerants, etc.) are rejected prior to offloading. Rejected materials are sent back with their respective delivery drivers. Materials are then sorted, boxed or barreled, and stored outside until they are shipped offsite to a bigger scrap metal facility, typically in Massachusetts or Rhode Island.

Facility Drainage Systems and Discharges

The location of the scrap metal storage at the Facility is approximately 350 feet west of the Merrimack River. The EPA Inspector observed that the ground surface between the scrap metal storage area and the Merrimack River was flat. The northwest corner of the Facility, where the bulk of the scrap metal is stored, is bordered by concrete block barriers and is paved with concrete (refer to Appendix A, Photographs 1 through 5). The remainder of the Facility is unpaved and mostly wooded (refer to Appendix A, Photographs 8 and 9).

The ground surface in the western half of the Facility is sloped from west to east, towards the Merrimack River located directly east of the Facility. Industrial activities at the Facility are predominantly contained in the western portion of the Facility. The eastern half of the Facility is flat until the ground surface drops downwards at the bank of the Merrimack River (refer to Appendix A, Photographs 10 through 12). Facility representatives

stated there are no storm drains at the Facility and the EPA Inspector did not observe any storm drains during the inspection.

Observations

At the time of the inspection, the EPA Inspector observed:

- the Facility's graded entrance off East Glenwood Street, sloping from west to east towards the Merrimack River (refer to Appendix A, Photograph 1).
- the main materials storage area on the impervious ground in the northeastern portion of the Facility including the Facility's office and scale (refer to Appendix A, Photographs 2 through 5).
- the shed holding flammable materials including drums of waste oil and the Facility's 200-gallon double-walled kerosene aboveground storage tank (AST) located next to the office (refer to Appendix A, Photographs 6 and 7).
- the Facility's wooded area, east of where the majority of Facility operations occur, where miscellaneous materials were stored including tires, compost, and ferrous metals in uncovered roll-off dumpsters (refer to Appendix A, Photographs 8 and 9).
- the Facility's eastern perimeter, directly adjacent to the Merrimack River (refer to Appendix A, Photographs 11 and 12). The eastern perimeter appeared free of debris and pollutants.

POTENTIAL NONCOMPLIANCE ITEMS:

At the time of the inspection, the EPA Inspector identified the following at the Facility:

1. The Facility is primarily engaged in industrial activity classified under SIC Code 5093 (Scrap and Waste Materials), a regulated industry under 40 C.F.R. § 122.26 for stormwater discharges associated with industrial activity.
2. The Facility did not have coverage under the 2021 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities.
3. As stated in the Facility Drainage Systems and Discharges section of this report, stormwater from Facility areas associated with industrial activity flows east towards the Merrimack River. The center and eastern portion of the Facility is a pervious, wooded surface. The EPA Inspector observed the ground surface in the center and eastern portion of the Facility to be flat.
4. The Facility stores the majority of the scrap metal in the northwest portion of the Facility, without storm resistant covering and without grading, berms, or curbing to prevent discharges of contaminated flows from the areas where scrap metal and other materials are stored (refer to Appendix A, Photographs 2 through 5). The Facility stores a pile of ferrous metals to the east of the main area, in the north central portion of the facility without storm resistant covering or berms (refer to Appendix A, Photograph 8).

CLOSING:

At the conclusion of the inspection, the EPA Inspector held a closing conference with the Facility representative and discussed the preliminary findings and observations of the inspection. The EPA Inspector reiterated that all

observations were preliminary and not compliance determinations. The closing conference began at 8:55 AM (EDT) and concluded at approximately 9:00 AM (EDT).