



**United States Environmental Protection Agency
Region I – New England
5 Post Office Sq., Suite 100
Boston, Massachusetts 02109-3912**

Via Electronic Mail *(date indicated on electronic signature)*

Mr. Kevin Wheeler, Director
Freudenberg-NOK Sealing Technologies
450 Pleasant Street
Bristol, NH 03222
Kevin.Wheeler@fnst.com

Re: Clean Water Act Inspection on September 21, 2021

Dear Mr. Wheeler:

On September 21, 2021, the U.S. Environmental Protection Agency ("EPA") conducted an announced inspection at Freudenberg-NOK Sealing Technologies' facility located at 450 Pleasant Street in Bristol, New Hampshire ("the Facility").

EPA inspectors viewed Facility metal finishing and rubber manufacturing operations, industrial wastewater sources subject to federal general and categorical pretreatment standards and wastewater sampling locations. Samples were also obtained by EPA of the discharge from the metal finishing process lines from the main manufacturing building. Inspectors also reviewed the Facility's stormwater pollution prevention plan (SWPPP) and oil spill prevention, control, and countermeasure (SPCC) plan.

Attached is the inspection report with monitoring data collected by EPA and pictures taken during the inspection. EPA is requesting the Facility address issues and/or deficiencies presented in the report and comments in pictures in parenthesis. EPA is requesting you provide a written response within 45-days of receipt. The response should be emailed to Joseph Canzano at canzano.joseph@epa.gov.

- The Facility initiated certain production change/s that are not shown on an April 28, 2021, Wastewater Schematic Flow Diagram which is part of the Facility Baseline Monitoring Report (BMR), 40 C.F.R. §403.12(b). The Diagram is not accurate and should be updated and the BMR should be amended to reflect changes. Certain unit operations have been combined, no longer discharge to the sewer and/or have been redirected to an evaporator or eliminated. EPA doesn't seem to have record from the Facility notifying EPA of the change/s. All Industrial Users shall promptly notify the Control Authority ... in advance of any substantial change in the volume or character of pollutants in their discharge, 40 C.F.R. §403.12(j).
- Semi-annual reports on compliance do not include discharge flow rate data for categorical unit operations and certain reports did not include analytical monitoring data. Reports from June 2018 through December 2020 did not include an estimated or actual discharge flow rate/s for wastewaters introduced into the sewer system from metal finishing and rubber manufacturing operations. The December 12, 2018, report did not include sample results from the TPS rubber manufacturing operation collected on October 29th and November 28th. Prior to the Facility's June 10, 2021, report monitoring results collected at the sewer pump house have not been included in semi-annual reports. Reports shall contain the results of sampling and analysis of the discharge, including the flow and the nature and concentration ... which are limited by the applicable Pretreatment Standards, 40 C.F.R. §403.12(g)(1).

- The June 10, 2021, semi-annual report for compliance from the Facility reported an estimated flow rate for wastewaters generated from metal finishing lines. It was determined during the inspection it is technically feasible for the Facility to install meter/s in certain location/s and report actual wastewater flow rate for metal finishing lines. Any Industrial User subject to a categorical pretreatment standard ... shall submit a report indicating the nature and concentration of pollutants in the effluent which are limited by such categorical standards ... include a record of measured or estimated ... daily flows for the reporting period, except that the Control Authority may require more detailed reporting of flows, 40 C.F.R. §403.12(e)(1). The EPA is requesting more detailed reporting for discharge flows from meter/s for metal finishing lines.
- At the time of the inspection, there did not appear to be a significant potential for a chemical spill to be introduced into the town's wastewater treatment works while the Facility is operating during normal business hours or is occupied. While EPA is not requiring a formal slug discharge control plan under 40 C.F.R. §403.12(f)(2)(vi), EPA recommends the Facility periodically review EPA's *Control of Slug Loadings to POTW Manual*¹, particularly the employee training program for reporting and responding to an accidental chemical spill to the publicly owned treatment works.

The Facility continues to be regulated under EPA's oil pollution prevention regulations at 40 C.F.R Part 112. According to the Facility's September 20, 2020, SPCC plan total aboveground oil storage capacity at the Facility equals more than 8,000-gallons and there is reasonable potential for a spill to reach surface waters. EPA reviewed the plan, and it doesn't appear to include a signature/stamp for management approval, management certification for applicability of substantial harm criteria and record for five-year plan review by management or date/s representing previous revisions to the plan. For more information about SPCC plans go to EPA's website at www.epa.gov/oilspill.

The Facility received authorization from EPA on June 24, 2021, for stormwater discharges associated with EPA's March 1, 2021, Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity, the (2021-MSGP). Prior to receiving permit authorization under the 2021-MSGP, Facility stormwater discharges were authorized under the 2015-MSGP. The Facility stormwater pollution prevention plan (SWPPP) is dated May 2021. The Facility has authorization for three stormwater outfalls.

The EPA is requesting you provide an electronic reply to this email acknowledging receipt of the report, and if you will be unable to respond to the report within 45 days due to COVID-19 impacts on your business, please email Mr. Canzano at canzano.joseph@epa.gov, or you can reach him by telephone at (617) 918-1763.

Sincerely,

**NEIL
HANDLER**

Digitally signed by NEIL
HANDLER
Date: 2021.10.21 09:49:16
-04'00'

Neil Handler, Senior Enforcement Coordinator
Enforcement & Compliance Assurance Division

Enclosures: (electronic)
Images and Pictures

cc: Alex Rastorguyeff, NH-DES, Alexis.Rastorguyeff@des.nh.gov
Jerry Keefe, EPA, keefe.jerry@epa.gov

¹ <https://www3.epa.gov/npdcs/pubs/owm021.pdf>

Michelle Coombs, EPA, coombs.michelle@epa.gov
Joe Canzano, EPA, canzano.joseph@epa.gov



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

Enforcement & Compliance Assurance Division

5 Post Office Square, Suite 100

Boston, MA 02109-3912

Subj: Inspection Report - Clean Water Act

Inspector: Joseph Canzano, Inspector & Compliance Officer
Enforcement & Compliance Assurance Division (ECAD-EWC)
Water Compliance Section (WCS)

JOSEPH
CANZANO

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JOSEPH CANZANO
Date: 2021.10.21
13:09:06 -04'00'

I. Facility Information

A. *Facility Name:* Freudenberg-NOK Sealing Technologies (the "Facility")
<https://www.tendercorp.com/>

B. *Facility Location:* 450 Pleasant Street
Bristol, NH 03222
43.585476° N
-71.750525° W

C. *Facility Contacts:* Ms. Letty Towne, Health and Safety Coordinator
Letty.towne@fnst.com
603 744 1614

Mr. Kevin Wheeler, Director
Kevin.Wheeler@fnst.com
603-744-1717

D. *ID No(s):* ICIS-NPDES (NHR053048)
ICIS-NPDES (NHG910006)
National Oil Data Base (R1-NH-00290)
Facility Registry Service ID (110007681758)

II. Background Information

E. *Date(s) of inspection:* September 21, 2021

F. *Weather Conditions:* Clear, 75-degree Fahrenheit
Previous Measurable Rain Event¹: Sept. 15th - .27"

G. *US EPA Inspector(s):* Joseph Canzano, Michelle Coombs

H. *State/Local Representative(s):* None

I. *Federally Enforceable Requirements Covered During the Inspection:*

- 40 C.F.R. Part 112, Oil Pollution Prevention Regulations
- 40 C.F.R. Part 122, NPDES² Regulations
- 40 C.F.R. Part 403, General Pretreatment Regulations
- 40 C.F.R. Part 433.15, Metal Finishing Regulations
- 40 C.F.R. Part 428.66, Rubber Manufacturing Regulations

III. Type and Purpose of Inspection

The purpose of the site inspection is to view the Facility's metal finishing and rubber manufacturing operations, process wastewater collection and transfer systems, and

¹ <https://www.wunderground.com/dashboard/pws/KNHBRIST1/graph/2021-09-12/2021-09-12/monthly>

² National Pollutant Discharge Elimination System ("NPDES").

sources subject to federal general and categorical pretreatment standards. EPA's inspectors review/evaluate for potential slug load discharge/s into the municipal wastewater treatment works, and implementation records required under federal stormwater, and oil storage and transfer regulations. Samples were also obtained by EPA of the discharge from the metal finishing process lines from the main manufacturing building.

IV. Disclaimer:

Unless otherwise noted, this report describes conditions at the Facility/property as observed by EPA, and/or through records provided to and/or information reported to EPA by Facility representatives and as understood by EPA. This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

V. Facility Description & File Review

The Facility's is a rubber mixing and production facility. The Facility supplies other Freudenberg plants with gaskets, packing, sealing devices, and metal cases for the manufacturing of custom-molded rubber products primary for the automotive and appliance industries. The Facility's reported primarily standard industrial classification code is 3053 (Gaskets, Packing, and Sealing Devices).

According to EPA's records³, the average rate of production (i.e., treated metal cases and rubber) for the Facility is approximately 100,000 pounds per day while the average amount of rubber processed is approximately 15,200 pounds per day. The Facility employs about 400 to 425 people, 3-shifts per day, Monday through Friday. Industrial wastewaters generated from manufacturing operations introduced into the sanitary sewer system are subject to federal pretreatment general and categorical standards. Specifically, General Pretreatment Regulations at 40 C.F.R. Part 403, Metal Finishing Regulations at 40 C.F.R. Part 433.15, and Rubber Manufacturing Regulations at 40 C.F.R. §428.66.

The Town of Bristol does not have a requirement to implement and enforce a federally approved industrial pretreatment program, and as such EPA is the *Control Authority* and *Approval Authority* for the Facility, see 40 C.F.R. §403.3(f) and (c) respectively. Under 40 C.F.R. §403.3(v) the Facility is a *Significant Industrial User* and is required, by federal regulations, to submit certain wastewater monitoring reports directly to EPA, at a minimum, twice per year and during the months of June and December, see 40 C.F.R. §403.12(e) and shall include results of sampling and analysis including flow of the discharge/s.

The EPA reviewed periodic reports on compliance (semiannual self-monitoring reports) submitted electronically to EPA by the Facility from June 5, 2018, through June 10, 2021. Certain reports did not include sample results noted in Facility cover letters. The December 12, 2018 and June 8, 2020 reports did not include results for the Ropelines rubber manufacturing line/s. Additionally, with exception to the June 10, 2021 report, reports do not include discharge flowrate/s for categorical unit operations as discussed in 40 C.F.R. §403.12(e)(1).

On May 25, 2021 the Facility submitted a Notice of Intent (NOI) form for continued coverage under EPA's newly reissued, March 1, 2021, NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity, the (2021-MSGP), and received authorization from EPA on June 24, 2021 (2nd quarter 2021) for permit coverage (Permit #NHR053048). Prior to receiving permit authorization under the EPA's 2021-MSGP, the Facility was permitted under EPA's 2015-MSGP.

The Facility identifies itself as being privately owned and applicable under primary Sector Y (Subsector Y1). Subsector Y1 in the 2015-MSGP and 2021-MSGP is associated with the manufacturing of Rubber Products Manufacturing. The Facility has potential to discharge industrial stormwaters from its property to surface waters from three outfalls.

³ November 9, 2009 Baseline Monitoring Report.

Two outfalls discharge to a tributary of the Smith River (i.e., Outfall #1 and Outfall #10) while one discharges to Newfound River (i.e., Outfall #9).

Much like the 2021-MSGP, the 2015-MSGP required, among other things, the Facility electronically submit annual stormwater reports to EPA by January 30th of each year for the previous calendar year. The Facility submitted annual stormwater reports in EPA’s NeT-MSGP system on January 26, 2017 (2016 annual report), January 29, 2018 (2017 annual report), January 16, 2019 (2018 annual report), January 21, 2020 (2019 annual report), and January 13, 2021 (2020 annual report). The next annual report (2021 annual report) is due January 30, 2022.

Total zinc is the identified pollutant of concern in Sector Y1. Monitoring results for total zinc have been submitted by the Facility into EPA’s NetDMR system. Monitoring results collected at Outfall #1 are periodically above the total zinc benchmark⁴ value while sample results collected at Outfall #9 are consistently below benchmark value. From December 2015 through December 2020 the average zinc discharge concentration at Outfall #1 is .083 mg/l, and for Outfall #9 it’s .039 mg/l. The Facility, in its 2020 stormwater annual report, indicates it implemented certain corrective action/s for reducing total zinc at Outfall #1, i.e., pavement sweeping to remove accumulated sediment and disposing/relocation of certain galvanized equipment and materials.

For the 2015 MSGP the Facility reported into EPA’s NetDMR system two outfalls, Outfall #9 and Outfall #1. In the 2021-MSGP, a third outfall, Outfall #10, is identified. Outfall #10 reportedly never discharges as such there are no monitoring results for zinc reported for this location or entered into EPA’s NetDMR.

The 2021-MSGP has new Indicator Monitoring requirements for Sector Y for Polycyclic Aromatic Hydrocarbons⁵ (PAHs). Monitoring for PAHs are to be conducted from paved surfaces that will be initially sealed or re-sealed with coal-tar sealcoat where industrial activities are located during coverage under the 2021-MSGP. For such situations, indicator monitoring for PAHs shall occur twice per year in the first and fourth years of permit coverage.

The Facility operates a groundwater remediation treatment system for management of migration of a chlorinated volatile organic compound plume. The system discharges treated effluent to a tributary of the Smith River through an outfall. The discharge is permitted under EPA’s NPDES General Permit for Remediation Activity Discharges (RGP) which became effective on April 9, 2017 and will expire on April 8, 2022, but coverage will be administratively continued until issuance of a new RGP.

Discharge monitoring results submitted to EPA by the Facility for the groundwater remediation treatment system indicate monitoring violations under the RGP. The table below summarizes reported violations.

Month/Year Report	Pollutant	Result	Limit/s
June 2017	pH	8.7 S.U.	6.5 S.U. - 8.0 S.U.
December 2018	Total Cadmium	.2 ug/l	.1875 ug/l
December 2018	Total Lead	2,700 ug/l	1,015 ug/l
June 2019	Total Cyanide	11 ug/l	5.9 ug/l

According to EPA’s records the Facility’s groundwater remediation treatment system is expected to be ongoing and continues to be subject to EPA’s NetDMR reporting requirements, which began August 1, 2019 for the Facility. EPA would like to remind the Facility to continue to use EPA’s NetDMR reporting system for all future groundwater remediation system discharge monitoring reports.

⁴ The benchmark value for total zinc is no greater than .05 mg/l based on hardness value/s reported for the receiving stream, see Table 8.Y-2 in the 2021-MSGP.

⁵ naphthalene, acenaphthylene, acenaphthene, fluorene, phenanthrene, anthracene, fluoranthene, pyrene, benzo[a]anthracene, chrysene, benzo[b]fluoranthene, benzo[k]fluoranthene, benzo[a]pyrene, benzo[g,h,i]perylene, indeno[1,2,3-c,d]pyrene, and dibenz[a,h]anthracene.

VI. In-Briefing, September 14, 2021

The inspection was announced and contact with Facility personnel occurred as early as August 25, 2021. Prior to performing the inspection Inspector Canzano requested copies of the Facility's stormwater pollution prevention plan (SWPPP), and oil spill, prevention control and countermeasure (SPCC) plan. The Facility submitted the SWPPP and SPCC plan on September 7, 2021. The SWPPP is dated of May 2021, and the SPCC plan is dated September 2020.

On September 14, 2021, EPA inspectors Canzano and Coombs coordinated a meeting with Freudenberg's personnel (Team⁶) via Microsoft Teams. Inspector Canzano informs the Team EPA would be performing a site inspection on September 21, 2021. The site inspection will include collecting wastewater samples. Inspector Coombs offers, if requested, to split the samples with the Facility. The inspection will include, but is not limited to, a review of industrial stormwater activities, oil and chemical storage and transfer locations, categorical pretreatment manufacturing operations, wastewater evaporator and discharge monitoring location/s.

Inspector Canzano explains EPA's site inspection protocol and health and safety measures. Inspectors will limit amount of time in interior spaces due to COVID considerations when viewing certain metal finishing and rubber cleaning manufacturing operations and wastewater compliance monitoring location/s. EPA will take photographs and review certain spaces for potential chemical spill paths to the sanitary sewer system which could cause or contribute to *Pass Through*, or *Interference* at the town's wastewater treatment works. The Team informs EPA's inspectors that all floor drains in the plant are sealed and the Facility doesn't have a formal/written Slug Discharge Control Plan.

The Facility periodically submits pretreatment reports on continued compliance to EPA. The reports notes metal finishing wastewaters are sampled at the "Filterpress Building", rubber manufacturing wastewaters are sampled at "TPS Mold Set Washer", and combined/total wastewater discharges to the POTW are sampled at the "Sewer Pump House". The Team informs EPA's inspectors, prior to June 2021, the Facility directed wastewaters from rubber manufacturing operation Rope-line #9/#10 sources to the sanitary sewer. Rope-line wastewaters have been redirected after June 2021 to an on-site evaporator unit and are no longer sampled and reported to EPA. Inspector Canzano explains EPA will try and collect wastewater samples in the same location as being reported by the Facility in its semi-annual reports.

Facility semi-annual reports indicate flow rate/s from metal finishing operations are estimated. Inspector Canzano informs the Team EPA will be requesting actual flow rate data moving forward for metal finishing wastewaters introduced into the sanitary sewer system versus estimated flows.

The Team informs EPA inspectors that the Facility Wastewater Schematic Flow Diagram, dated April 28, 2021, is not accurate. The Facility submitted the diagram to EPA on September 15, 2021. Certain unit operations have been combined, no longer discharge to the sewer and/or have been redirected to an evaporator or eliminated and the diagram doesn't include the changes. Additionally, wastewaters introduced into the collection system are neutralized for pH using potassium hydroxide at the Sewer Pump House. The Facility is not engaged in lead-sheathed hose production and compliance monitoring for total lead is performed at the Sewer Pump Station.

Inspector Canzano discusses sample results collected at the Filterpress Building and Sewer Pump House for certain detectable compounds, specifically results for phenol, acetone, methylphenol and aniline. The Team informs EPA's inspectors the Facility doesn't have a formal solvent management plan under 40 C.F.R. §433.12. The Team explains some of the standard operating procedures they use to prevent toxic organic compounds from being introduced into the collection system. Formalizing procedures may be considered moving forward.

⁶ Letty Towne, H/S Manager, Kevin Wheeler, Director, Rene Lefebvre, Facility Manager, and Ron Breton and Claire Lund from GZA Consulting.

VII. Site Inspection – September 21, 2021

EPA inspectors Canzano and Coombs arrived at the site at ~9:00 a.m. and were greeted at the entrance door by Mr. Wheeler. EPA inspectors presented credentials. Mr. Wheeler granted permission for EPA to enter the Facility and conduct the site inspection. EPA's inspectors and Facility personnel⁷ gather in a large meeting room to review health and safety protocol and logistics for conducting the inspection and collecting wastewater samples.

Inspector Canzano explains EPA would like to limit the amount of time in all interior building spaces and would like to view wastewater monitoring point/s, boiler room/s, and certain production and chemical storage areas. EPA inspectors will be reviewing, among other things, certain interior spaces for potential chemical slug load/spill to the sanitary sewer system.

Inspector Coombs explains EPA's sampling protocol and offers to split samples. Facility personnel decline the offer. Samples collected by EPA at the Filterpress Building will be analyzed for categorical metal finishing standards. EPA will also collect a sample for pH at the Sewer Pump House. EPA inspectors decided not to collect samples at the TPS Mold Set Washer because Facility personnel informed EPA inspectors the cleaning solution for the TPS Mold Set Washer is not spent and therefore is not a waste requiring discharge at this time. Ms. Towne explains the solution in the Washer was recently replaced.

Filterpress Building

The sampling location for metal finishing wastewaters is conducted in structure resembling a well. Inspector Canzano noted that the top of the structure is open and should have a cover, and sewer vent lines should be vented to the outside of the building.

Inspector Coombs prepares sample bottles and documents certain elements associated with collecting wastewater samples, see Attachment #1 for analytical results. Inspector Canzano and Mr. Lefebvre measured the monitoring well's dimensions. Mr. Lefebvre explains the overflow/spill alarm float switch in the well is not operating and needs to be repaired, and the chances of an overflow is remote because if power is lost all process wastewater flows will stop. At the entrance of the building is a storm drain which connects to Outfall #9. Mr. Wheeler informs Inspector Canzano the Facility is in the process of redesigning and appropriating monies to reconstruct parts of the Filterpress Building and some of the issues being observed are expected to be addressed.

Mr. Lefebvre describes flow direction for wastewaters. Wastewaters exiting the monitoring well flow via gravity to the Sewer Pump House. The discharge pipe from the well is submerged/hidden. Once wastewaters flow to the Sewer Pump House they combine and mix with other process and sanitary wastewaters before it is pumped to the town's sanitary sewer system.

The Wastewater Schematic Flow Diagram shows wastewaters entering the monitoring well from metal finishing coating/cleaning lines PHOS #1, PHOS #2 and PHOS #3. The Team determined the Diagram, provided to EPA on September 15, 2021, is not accurate and will be updated to show more clearly equipment contributing flow/s to the monitoring well. Additionally, it was determined that it may be possible to measure/meter flow rate from certain equipment/storage tanks to the monitoring well versus using estimated flows.

Inspector Coombs completes the job of collecting wastewater samples representative of metal finishing process lines.

Sewer Pump House & Stormwater Outfall #9

Mr. Lefebvre shows EPA inspectors the sampling location for Facility combined process and sanitary wastewaters. The monitoring location is a rectangular, below grade, covered pit. Wastewater is ejected from the pit by way of two pumps. Inspector Coombs prepares sampling equipment and documents certain elements associated with collecting wastewater samples.

⁷ Letty Towne, H/S Manager, Kevin Wheeler, Director, Rene Lefebvre, Facility Manager, and Ron Breton and Claire Lund from GZA

Mr. Lefebvre explains that the pumps activate individually from hi and low float switch/s and wastewaters flow from the pit into a force main which connects to the municipal sanitary sewer system. Wastewaters are pH adjusted in the pit using potassium hydroxide and final discharge is recorded using an instantaneous digital meter and daily wheel chart. The digital pH meter @11:06 a.m., records a pH value of 8.35 S.U. Flow rate to the sewer is recorded using an end-of-pipe digital ultrasonic flow meter manufactured by Turbo Company. The flowrate from the previous day recorded in the discharge logbook is 99,640-gallons, and meters were all observed to have calibration stickers.

Inspector Canzano recommends proper NFPA signage on the exterior of the building for identifying chemicals used/stored in the building, i.e., potassium hydroxide drum/s. Additionally, the discharge pump/s electrical breaker/s should be clearly labeled in the circuit breaker box. Inspector Canzano explains that if the pumps are not turned off in an appropriate amount of time during a spill then there is additional potential for a slug discharge to the sanitary sewer.

Inspector Coombs completes the job of collecting a grab pH wastewater sample from the pit. The Team escorts EPA inspectors to stormwater Outfall #9. The outfall is located on the north side of an access road located on the norther side of property. The outfall pipes are not marked or identified.

Mr. Lefebvre explains the drainage area for Outfall #9 includes stormwater run-off from several separate collection systems and drainage flow from certain sections of the production plant's roof drains. Stormwaters from certain areas combine and flow into Office Pond. Mr. Lefebvre explains Office Pond is manmade and water exists the Pond from a concrete structure. When the water in the Pond reaches a certain elevation, it flows into the structure and then to Outfall #9.

The water in the Pond appears to have no oder, clear and free of foam, floatables or oil. EPA inspectors are escorted to Outfall #9 and observe two pipes. No discharge flow from either. Mr. Lefebvre explains if water level in the Pond is too high then both outfalls will activate.

Inspector Canzano expresses concern regarding difficulty of access to Outfall #9. It's potentially unsafe, especially during winter months, and should be kept clear and made accessible for people to collect samples for deploying, in an emergency, a pipe plug/balloon. Additionally, the outfall/monitoring location should be identified in the field using signage, i.e., Freudenberg-NOK Sealing Technologies SW Outfall #9.

Inspection of Interior Spaces

EPA's inspectors are escorted through certain interior places in plant, i.e., evaporator room, chemical storage tank room, boiler room, metal finishing and rubber manufacturing areas, and the TPS Mold Set Washer monitoring point.

EPA's inspectors are shown the evaporator. Mr. Wheeler explains certain wastewaters are no longer discharged to the sewer and have been rerouted to a newly installed evaporator. Mr. Wheeler said the evaporator was installed in April/May 2021. Record keeping for the evaporator usage is maintained in a computer located in the evaporator room. Inspector Canzano requested a printable record for the month of September, but the printout was not available. The operator for the unit said the usage rate for the evaporator is about 1,000-gallons per batch per day.

EPA's inspectors enter the Facility's potassium hydroxide and phosphoric acid chemical storage room. The room contains two plastic potassium hydroxide tanks and two plastic phosphoric acid tanks. Mr. Wheeler explains that there are no drains in the room, its sealed and alarmed for a possible spill, and off-loading from a tanker truck to the tanks is not conducted alone - there is always an employee supervising acid or hydroxide off-loading activities and the area is under surveillance.

EPA's inspectors are shown the TPS Mold Set Washer unit. Ms. Towne explains that this is the monitoring point/location, end-of-process, for Facility rubber manufacturing wastewaters prior to discharge into the sewer system. An operator for the unit explains to EPA inspectors that the unit is a self-contained tank, the process uses proprietary solutions to clean mold sets containing rubber, all wash/rinse waters remain in the unit, and every six weeks about 400 gallons of solution and rinse are generated. Spent solution and rinse

is pH adjusted in place, tested and if within acceptable discharge range for pH and oil and grease concentration the solution is then discharged into the sewer system via sink drain. If the solution is out of spec it is then transported for off-site disposal.

EPA's inspectors are shown a phosphate coat metal finishing line. Mr. Wheeler explains that the Facility has three lines. Wastewaters flow from certain rinse tanks to an individual storage tank prior to being pumped from the tank to the well in the Filterpress Building. GZA and Facility personnel indicated that flow rate from the tank may be metered for each metal finishing line moving forward, and the storage tank/s and pump/s can be shown more clearly on the Wastewater Schematic Flow Diagram.

Stormwater Outfall #1, Groundwater Remediation Plant & Storage Buildings

EPA inspectors are escorted outside and to the Facility's fire protection pond and pump house. In the event of a building fire a diesel-powered engine will provide power for a pump that will draw water from the pond to the building sprinkler system. Inspector Canzano recommends improving building signage and consider installing a spill bucket for the oil tank fill line/port.

Mr. Lefebvre explains the water in the pond has potential to discharge to surface waters, but he has not observed a discharge from the pond in years. Inspector Canzano explains to Mr. Wheeler the Facility received authorization for stormwater discharges for the pond (Outfall #10) and is expected to enter periodically sampling data or a NODI code describing any no discharge condition/s for the outfall, i.e., the NODI code "C" is to be used for no discharge conditions for the reporting period.

Mr. Wheeler indicated that the Torit® dust collection system on the southern side of the plant is expected to be disassembled and replaced with a new system. The work expected to be complete by the end of the year, and the oil filled equipment/transformer next to the system and will be protected for impact.

Mr. Wheeler shows EPA inspectors SW Outfall #1, the groundwater treatment building and discharge location/outfall pipe for the treatment system. The drainage area for the outfall is located at the northwest end of the property. Runoff from paved and roof areas flow to swale at the edge of the pavement. Potential pollutant sources maybe storage of mechanical equipment, totes, sand/salt for ice and snow control and the area surrounding the groundwater treatment building. At the time of the inspection weather conditions were dry and no runoff flow was observed. The outfall is not identified in the field and Inspector Canzano recommends all outfall/monitoring locations be labeled.

Inspector Canzano is shown the inside of the groundwater remediation building. Facility records note the flow rate for the system is generally between three to six gallons per minute and discharge may be intermediate. The treatment plant includes, but is not limited to, flow equalization, cartridge filters, spray aeration, metal precipitant, air stripper, and liquid-phase activated carbon canisters.

EPA inspectors are shown the hazardous waste storage shed and methanol drum storage building. The area around the buildings is paved and runoff from the area flows into to a street drain. Mr. Wheeler explains the shed and building are in the drainage area for Outfall #9. Inspector Canzano observes spill prevention equipment in each building.

VIII. Closing Conference – September 21, 2021

Following the site walk the following issues were discussed.

- The Facility initiated certain production change/s that are not shown on the April 28, 2021, Wastewater Schematic Flow Diagram. It was determined during the inspection the Diagram is not accurate and should be updated. Certain unit operations have been combined, no longer discharge to the sewer and/or have been redirected to an evaporator or eliminated. In addition, wastewater storage tanks, pumps and future flow meters for metal finishing lines should all be shown on the diagram. Also, EPA has no record from the Facility notifying EPA of the change/s.

All Industrial Users shall promptly notify the Control Authority ... in advance of any substantial change in the volume or character of pollutants in their discharge, 40 C.F.R. §403.12(j).

- Facility periodic reports on continued compliance include estimated flow rates for metal finishing lines. It was determined during the inspection it is technically possible to install meters at certain locations and thereby quantify metal finishing wastewater flows versus providing an estimated flow.

Additionally, periodic reports from June 2018, through June 2021 are incomplete. Reports may not include all sample results collected and as noted in Facility cover letters. For example, the December 12, 2018 and June 8, 2020 reports did not include sample results collected from the Rope-line manufacturing operations, and certain reports do not include actual or estimated discharge flowrate/s.

Any Industrial User subject to a categorical Pretreatment Standard ...shall submit to the Control Authority ... a report indicating the nature and concentration of pollutants in the effluent. In addition, this report shall include a record of measured or estimated average and maximum daily flows for the reporting period for the Discharge ... except that the Control Authority may require more detailed reporting of flows, 40 C.F.R. §403.12(e)(1).

- At the time of the inspection, there did not appear to be a significant potential for a chemical spill (Slug Discharge) to be introduced to the POTW while the Facility is operating during normal business hours or is occupied, 40 C.F.R §403.12(f)(2)(vi). A Slug Discharge (40 C.F.R. §403.8(f)(2)(iv)) is any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits, or Permit conditions. EPA is recommending the Facility review EPA's Control of Slug Loadings to POTW Manual, particularly employee training program for reporting and responding to an accidental chemical spill to the POTW.

End of report.

Attachment #1
Wastewater Sampling Results

EPA conducted sampling during the inspection on September 21, 2021. Samples of effluent were collected from inside the Filter Press Building. The tank receives discharge from the metal finishing process lines from the main manufacturing building.

Inspector Coombs collected grab samples from the tank for total metals, total cyanide, semi-volatile organic compounds (BNAs), and volatile organic compounds (VOCs) and instantaneous grab samples for Hydrogen Ion Concentration (pH) and Total Residual Chlorine (TRC) for in-situ screening. At 10:25 HRS, sample collection was initiated, and the sample was field tested for pH using an Oakton pH meter and TRC using a HACH colorimeter. The pH was 7.81 Standard Units (S.U.) and the TRC was 0.00 mg/L.

The total metals sample was collected in a 250-mL HDPE container and preserved with nitric acid to attain a pH of less than 2 S.U. The total cyanide sample was collected in a 250-mL HDPE container and preserved with sodium hydroxide to attain a pH of above 12 S.U. The BNA samples were collected in 1-liter amber jars with no preservative added. The VOC samples were collected in 40-mL amber vials and preserved with hydrochloric acid to attain a pH of less than 2 S.U. All samples were then placed in coolers with ice to maintain an internal temperature of less than 6 degrees Celsius and delivered to the the EPA New England Regional Laboratory in North Chelmsford, MA to be analyzed.

At 10:50 HRS, the EPA inspection team collected an instantaneous grab sample for pH at the facility’s Sewer Pump House (“end of pipe” location) and detected the pH at 8.36 S.U.

EPA Sampling and Analytical Results

The table below provides a summary of the laboratory analytical results and field parameters collected during the inspection. For a full list of compounds analyzed for each parameter and their results, refer to the laboratory reports that are attached to this inspection report.

Table 1: Summary of Freudenberg-NOK Sealing Technologies 9/21/21 Inspection

Sample #	Sample Date and Time	Sample Type	pH (S.U.)	TRC (mg/L)	Analytical Results (mg/L)		Pretreatment Standards for 40 CFR §433.15	
							Daily Maximum (mg/L)	Monthly Average (mg/L)
MP001	9/21/21 10:25 HRS	Grab	7.81	0.00	VOCs¹			
					Acetone	0.17	2.13	N/A
					BNAs¹			
					2,4-dimethylphenol	0.0029	2.13	N/A
					Total Cyanide	0.028	1.20	0.65
					Total Metals²			
					Cadmium	ND	0.69	0.26
					Chromium	ND	2.77	1.71
					Copper	ND	3.38	2.07
					Lead	ND	0.69	0.43
					Nickel	ND	3.98	2.38
					Silver	ND	0.43	0.24
					Zinc	ND	2.61	1.48

Notes:
1: Compounds that were analyzed but not listed in this table are Not Detected above Reporting Limit (ND).
2: Metals within the pollutants of concern under the Metal Finishing Point Source Category in 40 CFR 433.15.