UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Drafted Date: June 24, 2022
Finalized Date: *Dated as shown on electronic signature*

Subj: Inspection Report
Clean Water Act
Bomar, Division of Pompanette, LLC

From: John (Jack) Melcher, Enforcement Officer

JOHN MELCHER Digitally signed by JOHN MELCHER Date: 2022.07.29 16:47:28 -04'00'

Michelle Coombs, Inspector

MICHELLE COOMBS Digitally signed by MICHELLE COOMBS Date: 2022.08.01 07:24:06 -04'00'

Appendices:

Appendix A – No Exposure Certification
Appendix B - Photographs
Appendix C – Aerial Photograph
Appendix D - Monitoring and Reporting Procedures
Appendix E - VOAs
Appendix F - BNAs
Appendix G - Cyanide
Appendix H - Metals
Appendix I - Pesticides and PCBs

I. Facility Information

A. *Facility Name:* Bomar, Division of Pompanette, LLC

B. *Facility Location*: 73 Southwest Street
Charlestown, NH 03603

C. *Facility Contacts:* Dennis Squires, Hazardous Waste Coordinator
603-690-1165, dennis_squires@pompanette.com

Craig Goodrich, General Manager
603-826-5791

D. *NPDES ID No(s).:* NHPIU0002 (wastewater pretreatment)
NHNOEJ014 (stormwater)

II. Background Information

A. *Date(s) of inspection:* June 21, 2022

B. *Weather Conditions:*
Weather Underground reports the previous precipitation in Charlestown, New Hampshire was 0.12 inches on June 13

C. *US EPA Representative(s):*
John (Jack) Melcher, Enforcement Officer
Michelle Coombs, Inspector
William Sommer, Inspector

D. *State/Local Representative(s):*
Ken Vandenburgh, Chief Operator, Town of Charlestown Water & Wastewater Department

E. *Federally Enforceable Requirements Covered During the Inspection:*
40 C.F.R. Part 403 – General Pretreatment Regulations for Existing and New Sources of Pollution[1]
40 C.F.R. § 433.17 – Metal Finishing Point Source Category, Pretreatment Standards for New Sources[2]
40 C.F.R § 122.26 – National Pollutant Discharge Elimination System ("NPDES") regulation for the discharge of stormwater

F. *Previous Enforcement Actions:*
No EPA Clean Water Act enforcement actions are on record since at least May 10, 2002.
On May 10, 2002, EPA sent an information request (Docket No. 02-308P-043) regarding Clean Water Act compliance.

III. Type and Purpose of Inspection

EPA conducted an Industrial User ("IU") Evaluation Inspection and an IU Sampling Inspection to evaluate compliance with the General Pretreatment Regulations at 40 C.F.R. Part 403 and the Metal Finishing Point Source Category, Pretreatment Standards for New Sources at 40 C.F.R. § 433.17.

EPA conducted a Compliance Evaluation Inspection to evaluate compliance with the National Pollutant Discharge Elimination System ("NPDES") regulation for the discharge of stormwater at 40 C.F.R § 122.26.

[1] Available at: https://www.ecfr.gov/current/title-40/chapter-I/subchapter-N/part-403?toc=1

[2] Available at: https://www.ecfr.gov/current/title-40/chapter-I/subchapter-N/part-433?toc=1

IV. Facility Description

The Facility manufactures marine hardware.

EPA's Enforcement Compliance History Online ("ECHO") website provides general environmental compliance data for Bomar, Division of Pompanette, LLC ("Bomar" or "the Facility").[3]

A. Wastewater

The Facility discharges wastewater from tumbling, ultrasonic cleaning, electropolishing, and passivation. The Facility's treatment system consists of pH adjustment, coagulation, and filtration.

EPA's previous on-site inspection to evaluate the Facility's compliance with the Pretreatment Standards was on March 25, 2009.

The New Hampshire Department of Environmental Services performed an Industrial User Site Visit on February 18, 2022.

According to Periodic Reports on Continued Compliance submitted by the facility, the facility's average daily discharges are approximately 200 gallons per day and maximum daily discharges are approximately 3,000 gallons per day.

The Facility discharges to the Town of Charlestown Publicly Owned Treatment Works (NPDES Permit No. NH0100765). Mr. Vandenburgh has been the Chief Operator for the Town since May 2022.

B. Stormwater

EPA's previous on-site inspection to evaluate the Facility's compliance with the NPDES stormwater regulations was on March 26, 2009.

The Facility submitted a No Exposure Certification dated January 21, 2020, for "78 Southwest Street." The certification form, included as Appendix A of this report, indicates that the Facility does not require permit authorization under EPA's Stormwater Multi Sector General Permit for its stormwater discharges associated with industrial activity because no industrial activities are exposed to stormwater.

V. Inspection

Mr. Melcher announced the inspection to the Facility on June 9, 2022.

[3] Available at: https://echo.epa.gov/detailed-Facility-report?fid=110001122972. Accessed on June 23, 2022.

Mr. Melcher, Ms. Coombs, and Mr. Sommer ("the EPA inspectors") arrived at approximately 10:30 on June 21, 2022.

Unless otherwise noted, this report describes conditions at the Facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by Facility representatives and as understood by the inspector(s). 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.

A. Opening Conference

The EPA inspectors and Mr. Vandenburgh met with Mr. Squires and Mr. Goodrich of Bomar. Mr. Melcher and Mr. Sommer presented credentials; Ms. Coombs presented credentials at the Closing Conference. Mr. Melcher provided a copy of the Small Business Resources Information Sheet and explained the purpose of the inspection.

Mr. Squires explained that his duties include hazardous waste coordinator, production manager, and safety officer. Mr. Squires has been managing wastewater compliance since approximately 2018.

Mr. Squires said that Bomar produces marine hardware, including casings for lights and hatches. Bomar also produces hardware for wind turbines, fire trucks, and railroad locomotives.

Mr. Squires said that Bomar's facility includes two main buildings: one at 73 Southwest Street and one at 58 Southwest Street. A sand-cast aluminum foundry, metal sanding and grinding, tumbling, and anodizing processes are located at 73 Southwest Street. Metal parts coating operations are located at 58 Southwest Street. No industrial wastewaters are generated by the foundry or by the coating operations.

Mr. Squires described Bomar's wastewater treatment process. Wastewaters are accumulated in a 1,400-gallon tank. The pH of the wastewater is reduced to ensure that all metals are dissolved, raised to precipitate out metals, and then lowered again to neutral. Wastewater is then pumped to two 1,000-gallon tanks where a flocculation agent is added, as well as, sometimes, aluminum sulfate and calcium chloride coagulants. Wastewater is then pumped to a clarifier ("the ladder") where solids are removed. Sludge from the clarifier is pumped to a filter press; filtrate is directed back to the initial tank and "sodium hydroxide filter cake" is produced and shipped off as a hazardous waste.

Mr. Squires said that Bomar typically treats and discharges approximately two batches per month. The first batch treated each month is sampled for metals and cyanide (and periodically for Total Toxic Organics) and results sent to the Town and EPA. Treatment of a batch typically takes six or seven hours. Bomar last treated a batch in early June.

Ms. Coombs asked if Bomar had a flow diagram of the wastewater treatment system. Mr. Squires said that a diagram was not readily available, but he could look in the files.

Mr. Squires said that, as requested by Mr. Melcher's telephone call on June 9, the Facility had a tank of wastewater available for EPA to sample. The wastewater was untreated.

Mr. Squires said that it was Bomar's practice to calibrate its pH meters by leaving the probe in each standard for 20 minutes. Due to this practice, it would take some time for the Facility to set up their treatment process. Mr. Squires said that he did not know the reason why the 20-minute duration was used at the Facility and said that the pH reported by the meters typically reaches an equilibrium after a few minutes. Ms. Coombs said that she was not familiar with the 20-minute duration and suggested that the Facility consult with the guidelines establishing test procedures in 40 C.F.R. Part 136.

The Facility representatives and the EPA inspectors agreed that Bomar would treat a batch of wastewater while the EPA inspectors observed.

B. Wastewater Treatment Room Tour

At approximately 11:00, the EPA inspectors, Mr. Squires, Mr. Goodrich, and Mr. Vandenburgh went to the wastewater treatment room. In the wastewater treatment room, they were joined by Shawn Snide, the backup Hazardous Waste Coordinator.

Select photographs taken during the inspection are provided in Appendix B of this report.

Photograph 1 ("Photo 1") shows the tank storing wastewater for treatment from anodizing and tumbling ("Holding Tank #1").

Photo 2 shows the pipe from the pump below Holding Tank #1. The pipe, like other pipes observed in the wastewater treatment room, is labeled. The label reads "SLUDGE PUMP/LINE FROM HOLDING TANK #1."

Photo 3 shows the two tanks where flocculants (and other chemistry, as needed) are added. The tanks are labeled "Melon Tank 1" and "Melon Tank 2." Mr. Squires said that "Melon" refers to the treatment process. pH meters are present on the Melon Tanks. Mr. Squires said that the meters ("Liquidtron DP5000") can be used to control equipment but were only used by Bomar to display pH.

Photo 4 shows the "Clarifier Holding Tank." Wastewater flows from Melon Tank 2 into the Clarifier Holding Tank. A sump pump in the Clarifier Holding Tank pumps wastewater to the clarifier. The pump is controlled by two floats – a white float that serves as the primary control on the pump and, if the white float fails to activate, a black float that serves as a backup control.

Photo 5 shows the clarifer (also known as "the ladder" for the appearance of its baffles).

Photo 6 shows a portion of the top of the clarifer. Flow enters the clarifer towards the rear and leaves toward the front of the clarifier.

Photo 7 shows the Clean Water Holding Tanks. Tank 1, located on the right of the photograph, is primarily used by Bomar to hold wastewater prior to discharge to the

Town. Photo 8 shows the interior of Clean Water Holding Tank 1. Mr. Squires said that the second holding tank gives the Facility flexibility should wastewaters not meet specifications.

Mixers were not present in the Clean Water Holding Tanks. Mr. Squires said that wastewaters are not held in the Clean Water Holding Tanks for long and that he had not observed solids settle out.

Photo 9 shows the Sludge Holding Tank. Sludge from the clarifier flows to the Sludge Holding Tank. Sludge is then pumped to the filter press.

A photograph was not taken of the filter press.

Photo 10 shows a barrel with a sump pump that allows for the Facility to pump from the Sludge Holding Tank to the Clean Water Holding Tanks. Mr. Squires said that this feature had never been used to his knowledge.

Mr. Squires said that off-spec wastewater in the Clean Water Holding Tanks could be routed to the Sludge Holding Tank and then to Holding Tank #1.

Photo 11 shows containers of treatment chemicals. The bag is labeled "calcium chloride," the fiber drums are labeled "BONDERITE S-PD PHA PAINT FLOCCULANT; NOVAFLOC PHA," and the plastic pails are labeled "Aluminum Sulfate."

Photo 12 shows a pH display and recorder. Mr. Squires said that two probes are connected to the unit – one for the digital display and one for the analog recorder. The analog recorder draws on a paper roll. Mr. Squires said that he keeps paper rolls with pH records. Mr. Squires said that the probes can be moved to the secondary Clean Water Holding Tank, but usually stay in the primary Clean Water Holding Tank.

Photo 13 shows a flow meter on the discharge pipe from the Clean Water Holding Tanks. Mr. Squires said that he records an instantaneous flow when the discharge to the Town begins but said that the flow rate slows as the head pressure in the tank reduces. Mr. Squires said that the Facility records the total volume recorded by the flow meter at the start and at the end of every discharge.

A sink in the wastewater treatment room connects with the wastewater line following the flow meter.

At approximately 11:45, the inspection paused for lunch.

C. Discussion of High Nickel Concentration Observed in May 2022

At approximately 12:15, the inspection resumed. As the Facility began treating the wastewater in Holding Tank #1, Mr. Melcher had a side conversation with Mr. Squires.

Mr. Melcher asked Mr. Squires for an explanation of the anodizing process. Mr. Squires said that anodizing is done to remove scratches and to prevent corrosion of aluminum

parts. Anodizing is performed by dipping parts in sulfuric acid and running a current through the bath, greatly accelerating the speed at which metals dissolve into the acid bath.

Mr. Melcher asked Mr. Squires if he knew the cause of the high nickel concentration (5.3 milligrams per liter) observed by the Facility during sampling on May 9, 2022. Mr. Squires said that he believed that the root cause of the high nickel concentration was a different alloy used by the Facility during that period. Aluminum alloys typically contains some zinc, copper, and nickel. The Facility typically receives "6061" aluminum, but instead received "6065" aluminum from its supplier.

According to Mr. Squires, the Facility uses a chemical etching process on parts to remove marks left by grinding and sanding prior to anodization. The etching process used by the Facility removed an excessive amount of nickel from the 6065 aluminum and the treatment system could not adequately treat the wastewater. The Facility has requested that future shipments from its supplier use 6061 aluminum but Bomar is still working through its supply of 6065 aluminum. To reduce nickel loads on the wastewater treatment system, the Facility is using a finer grit to sand parts and has reduced the time for which parts are chemically etched.

Mr. Squires told Mr. Melcher that nickel is also present in a sealant used on parts by Bomar. Mr. Squires showed Mr. Melcher the Safety Data Sheet for "Gardoseal Z1959." The Safety Data Sheet listed nickel di(acetate) as a constituent. However, Mr. Squires said that he did not think that the sealant was the source of the elevated nickel since the application of the sealant has not changed in recent months.

Mr. Squires told Mr. Melcher that the Facility used to perform black dying following anodization but does not do so anymore. The Facility still has black dye tanks and lists the process on its hazardous waste management plan but plans to remove the tanks soon.

D. Wastewater Treatment

At approximately 12:15, the EPA inspectors and Mr. Vandenburgh joined the Facility representatives in the wastewater treatment room. Mr. Snide was in the process of adding sulfuric acid to Holding Tank #1 to lower the pH of the wastewater. Mr. Snide added sulfuric acid by climbing a step ladder next to Holding Tank #1 carrying a bucket of sulfuric acid and dumping it into the top of the tank.

Photo 14 shows a portable meter reading "2.0" when Mr. Snide had finished adding sulfuric acid.

Mr. Melcher asked Mr. Snide if adding treatment chemical via a pump would be safer. Mr. Snide said that doing so would be safer, but that Bomar did not have the equipment to do so.

Mr. Melcher asked Mr. Snide to explain the process for adjusting the pH of Holding Tank #1. Mr. Snide said that the pH was reduced to approximately 2 to ensure that all metals were dissolved. Next, sodium hydroxide was added to raise the pH to approximately 12

to drop all metals out of solution. Finally, sulfuric acid was added to reduce the pH to approximately 7 so that it would be the proper pH for discharge. The Facility does not adjust pH following adjustment in Holding Tank #1.

Mr. Vandenburgh said that there were no pump stations between the Facility and the Town's Wastewater Treatment Facility. The Wastewater Treatment Facility is a lagoon system with a headworks, primary lagoon, and secondary lagoon. The Town has not discharged to the Connecticut River since May 6 because the Town had to drain down its secondary lagoon to repair aeration equipment and the lagoon is still filling back up. Typical influent flow to the Town's Wastewater Treatment Facility is approximately 125,000 gallons per day.

At approximately 13:30, the pH in Holding Tank #1 reached 7.0 and a pump was activated to send flow to the Melon Tanks. No chemicals were added to Melon Tank #1. Mr. Melcher asked Mr. Snide what the purpose of Melon Tank #1 is; Mr. Snide said that he did not know.

Photo 15 shows Melon Tank #2 after wastewater had begun flowing and Mr. Squires had added a scoop of liquid flocculant ("Novafloc") to the tank. Mr. Squires said that when the treatment system is operating, the operator (either Mr. Squires or Mr. Snide) needs to be in the room continuously to monitor performance. Novafloc is added when floc size starts to decrease, approximately every ten minutes. A pump was present above the barrel of Novafloc; Mr. Squires said that the pump did not provide an adequate dosing rate, so manual addition of Novafloc is performed instead. Mr. Squires said that the solution of Novafloc is very dilute (approximately one-half cup of Novafloc per 10 gallons of water).

Mr. Squires added an approximately one-quarter cup of aluminum sulfate powder to Melon Tank #2 approximately every 30 minutes.

Mr. Squires said that calcium chloride is typically only added in the winter. The treatment process is heat-sensitive and calcium chloride addition generates heat.

Ms. Coombs asked if boiler blowdown was routed into the wastewater treatment system. Mr. Squires said that it was not.

Periodically, Mr. Squires looked into the outlet end of the clarifer to confirm that no solids were visible.

At approximately 14:10, the Facility began discharging wastewater to the Town.

Mr. Squires recorded the pH in the primary Clean Water Tank. The pH shown on the meter was 7.8. Mr Squires explained that this pH from the start of the discharge was the pH reported to EPA. Mr. Squires said that since neutralization chemistry was not added once Holding Tank #1 had been adjusted to a neutral pH, he expected that the pH would be consistent throughout the discharge.

Mr. Squires recorded the total volume from the flow meter and verified that it matched the ending total volume from the last discharge on June 6.

At approximately 14:20, Mr. Squires turned off the valve from the primary Clean Water Tank. The pH meter still displayed a pH of 7.8. Mr. Squires explained that he was turning off the discharge because most of the wastewater was being collect for sampling.

E. Wastewater Sampling

EPA conducted sampling of the facility's pretreated effluent during the inspection on June 21, 2022. According to Mr. Squires, compliance samples are collected from the top of the clarifier. Due to safety and logistical reasons, the EPA inspection team decided not to deploy an automatic sampler to collect composite samples. Instead, they determined that collecting manual grab samples over the course of the batch discharge was the safest and most efficient method of composite sample collection.

At 14:25, EPA collected grab samples for the analysis of volatile organic compounds ("VOCs"), base/neutral and acid extractables ("BNAs"), pesticides, polychlorinated biphenyls ("PCBs"), and total cyanide from the clarifier. At this time, EPA also initiated the first manual grab sample to be composited for the analysis of metals, and took another sample every 30 minutes after that until about 16:15. A total of 4 manual grab samples were collected between 14:25 and 16:15, which were composited and homogenized before pouring into the sample container. A sample ("Pomp") and a duplicate ("Dup-01") were collected for each parameter. An instantaneous grab sample was collected for pH and Total Residual Chlorine ("TRC") for in-situ screening. The sample was field tested for pH using an Oakton "pHtestr" pH meter and TRC using a HACH "DR300" colorimeter. The pH was 7.52 Standard Units (S.U.) and the TRC was 0.00 mg/L.

The total metals samples were collected in 250-mL HDPE containers and preserved with nitric acid to attain a pH of less than 2 S.U. The total cyanide samples were collected in 250-mL HDPE containers 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 pesticides/PCBs 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 4 degrees Celsius and delivered to the to the EPA New England Regional Laboratory in North Chelmsford, MA to be analyzed.

F. Wastewater Reporting

While wastewater sampling was in progress, Mr. Melcher provided some comments to Mr. Squires on the Facility's wastewater reporting.

Mr. Melcher said that the Facility's Periodic Reports on Continued Compliance were signed by Mr. Squires and Mr. Snide. Mr. Melcher encouraged the Facility to review the General Pretreatment Regulations to ensure that the individuals signing reports have sufficient authority. In general, individuals signing reports must be authorized to make capital expenditures. References to the applicable regulation are provided in the Monitoring and Reporting Procedures document to be provided at the closing conference.

Mr. Squires stated that his job description provided that he had authority to make capital expenditures during emergencies.

Mr. Melcher said that the Facility typically analyzes wastewater semiannually using EPA Method 8260C and Method 608.3. These methods do not capture all of the Total Toxic Organics listed in the Metal Finishing Point Source Category regulations. Mr. Melcher said that, in lieu of regular monitoring, the regulations allow for the Facility to prepare a Toxic Organics Management Plan and certify that no toxic organics had been discharged to the sewer. References to the applicable regulation are provided in the Monitoring and Reporting Procedures document.

Mr. Melcher said that, while emailing Periodic Reports on Continued Compliance was appropriate during the COVID-19 pandemic, the General Pretreatment Regulations require the submittal of hard copy reports. An updated mailing address is provided in the Monitoring and Reporting Procedures document. In addition, EPA requests that the Facility continue to provide electronic copies of Periodic Reports on Continued Compliance to a new email address provided in the Monitoring and Reporting Procedures document.

Mr. Melcher said that the minimum reporting frequency in the General Pretreatment Regulations was semi-annually, and that EPA has discretion to reduce the monthly monitoring and reporting frequency currently required by the EPA Request for Information, dated May 10, 2002.

Mr. Melcher said that, in the next several years, EPA would be requiring the Facility to complete its Periodic Reports on Continued Compliance by filling out a form online.

G. Process Tour

At approximately 15:45, the EPA inspectors, Mr. Vandenburgh, Mr. Squires, and Mr. Goodrich performed a tour of some of the Facility's industrial processes.

Photo 16 shows a summary of the Facility's two anodizing lines.

Photo 17 shows a tumbling machine. Mr. Squires said that soap and water are added to the tumbler during operation and this mixture is drained to the wastewater treatment system.

The group visited the aluminum foundry. Mr. Squires said that no wastewater was generated in the foundry.

H. Stormwater Tour

At approximately 16:05, the EPA inspectors, Mr. Vandenburgh, Mr. Squires, and Mr. Goodrich left the foundry at the southeastern end of 73 Southwest Street and walked counterclockwise around the building. Appendix C shows an aerial photograph of the Facility marked up by EPA.

Several bag houses were observed on the southwest side of 73 Southwest Street; all appeared to be in good repair and no materials were observed on the ground near the receptacles. Photo 18 shows an example bag house.

Photo 19 shows gray particulate materials on the pavement on the southwest side of 73 Southwest Street. Mr. Squires said that the material was placed by their snow and ice control contractor to provide grit and aid in melting. Mr. Vandenburgh, who has experience in municipal roadway maintenance, confirmed that use of this material is a common practice in the area.

Photo 20 shows a catch basin with a "Pig Sack" installed. A media of foam-like blocks was observed inside the sack. Mr. Squires said that the sack fills with stormwater and then overflows within the catchbasin, removing particulates.

Photo 21 shows the southwest side of 73 Southwest Street. The large vent stack emits treated air discharges from the anodizing room. No particulate matter or other visible deposits of residuals from the vent stack was observed.

The group walked counterclockwise around 58 Southwest Street.

Loading docks with trench drains were observed on the southeast side of 58 Southwest Street. Mr. Squires said that spill control kits were present inside 58 Southwest Street. Mr. Squires said that liquids were delivered to 73 Southwest Street, where no drains are present. A covered dumpster was observed.

A dumpster with an open top was observed by the group. Mr. Squires said that it was used for demolition materials, including scrap wood. Mr. Goodrich said that Bomar's products are frequently packed in wooden crates. Mr. Melcher looked into the dumpster and saw a variety of materials including wood and two pallet jacks. Mr. Melcher asked if the dumpster could be covered. Mr. Squires said that a tarp could be placed over the dumpster.

To the north of 58 Southwest Street, an additional building was observed. Mr. Squires said that the building was owned by Bomar and used for storage. The group did not approach the building closely.

Photos 22 through 25 show baghouses and old materials and equipment on the southwest side of 58 Southwest Street. Mr. Squires said that only two of the four baghouses were still in use – the other two baghouses are no longer needed. The plywood present had the appearance of weathering, indicating that the materials had been outdoors for a significant amount of time.

Two catchbasins were observed near the southwest corner of the paved area behind 58 Southwest Street. Mr. Squires said that the catchbasins drained to an outfall to the southwest. The area to the southwest was a thickly vegetated embankment and the outfall was not viewed.

I. Closing Conference

A closing conference was held at approximately 16:45 by the EPA inspectors, Mr. Vandenburgh, Mr. Squires, and Mr. Goodrich. Mr. Melcher provided preliminary areas of concern from the inspection.

Mr. Melcher summarized his discussion with Mr. Squires earlier in the inspection regarding the high nickel concentration observed in May 2022. Mr. Squires reported that the nickel concentration observed from sampling performed on June 6, 2022, was compliant with the Metal Finishing Pretreatment Standards for New Sources at 40 C.F.R. § 433.17.

Mr. Melcher re-iterated his earlier statements that the Facility's Total Toxic Organics sampling did not include all of the regulated chemicals. Mr. Melcher provided a copy of the Monitoring and Reporting Procedures document (included as Appendix D of this report) and encouraged the Facility to pursue certification in lieu of regular monitoring for all Total Toxic Organics.

Mr. Melcher said that the materials located behind 58 Southwest Street appeared to be inconsistent with the checklist included in the No Exposure Certification. Mr. Melcher encouraged the facility to remove materials or products stored outdoors.

Mr. Melcher said that he would email Mr. Squires following the inspection to request electronic copies of several Periodic Reports on Continued Compliance that were not present in EPA's files.

Mr. Squires said that the Facility would like to explore reducing the required monitoring frequency for industrial wastewater discharges.

The EPA inspectors departed at approximately 17:00.

VI. Sampling and Analytical Results Summary

Table 1, 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 in Appendices E through I.

Table 1: Summary of Bomar-Pompanette 6/21/22 Sampling Inspection

Sample #	Sample Date and Time	Sample Type	pH (S.U.)	TRC (mg/L)	Analytical Results (mg/L unless otherwise noted)		Pretreatment Standards for 40 CFR 433.17	
							Daily Maximum (mg/L)	Monthly Average (mg/L)
POMP	6/21/22	Grab	7.52	0.00	**VOAs[1,2]**		2.13	N/A
					2-Butanone (MEK)	0.0024		
					Tetrahydrofuran	0.001		

	14:25 6/21/22 16:14	Compo site			**BNAs[1,2]**	ND	2.13	N/A
					Total Cyanide	ND	1.20	0.65
					Total Metals[3]			
					Cadmium	ND	0.11	0.07
					Chromium	ND	2.77	1.71
					Copper	ND	3.38	2.07
					Lead	ND	0.69	0.43
					Nickel	0.2	3.98	2.38
					Silver	ND	0.43	0.24
					Zinc	ND	2.61	1.48
					Pesticides[1,2]	ND	2.13	N/A
					PCBs[1,2]	ND	2.13	N/A
DUP-01	6/21/22 14:25 6/21/22 16:14	Grab Compo site	N/A	N/A	**VOAs[1,2]**		2.13	N/A
					2-Butanone (MEK)	0.0015		
					BNAs[1,2]	ND	2.13	N/A
					Total Cyanide	ND	1.20	0.65
					Total Metals[3]			
					Cadmium	ND	0.11	0.07
					Chromium	ND	2.77	1.71
					Copper	ND	3.38	2.07
					Lead	ND	0.69	0.43
					Nickel	0.21	3.98	2.38
					Silver	ND	0.43	0.24
					Zinc	ND	2.61	1.48
					Pesticides[1,2]	ND	2.13	N/A
					PCBs[1,2]	ND	2.13	N/A

Notes:
1: Compounds that were analyzed but not listed in this table are Not Detected above Reporting Limit (ND).
2. Compounds are not subject to the Total Toxic Organics (TTO) standard in the Metal Finishing Point Source regulations under 433.17, but were detected above the analytical reporting limit. Compounds subject to the TTO standard were not detected.
3: Metals within the pollutants of concern under the Metal Finishing Point Source Category under 40 CFR 433.17.