



REGION 1

BOSTON, MA 02109

Dated by Electronic Signature

February 14, 2024

Mr. Alan Plue
AJ Nonwovens – Hampton, LLC
11 Merrill Industrial Drive
Hampton, New Hampshire 03842

Re: Inspection of AJ Nonwovens, 11 Merrill Industrial Drive, Hampton, New Hampshire on December 7, 2023.

Dear Mr. Plue,

On December 7, 2023, the U.S. Environmental Protection Agency Region 1 ("EPA") performed a multi-media inspection at AJ Nonwovens located on Merrill Industrial Drive in Hampton, New Hampshire (the "Facility" or "site") regarding compliance with the Clean Water Act ("CWA"). A copy of the inspection report is enclosed with this letter. EPA inspectors identified the following areas of concern during this inspection. **Within 30 calendar days of the receipt of this letter**, submit a report detailing what actions have been taken already, and what actions will be taken, to address these areas of concern to Damian Bednarz of my staff at bednarz.damian@epa.gov.

1. Pretreatment Regulations (40 C.F.R. § 403) – Permit ID NHPIU0008

- A. AJ Nonwoven is permitted to discharge industrial wastewater to the Town of Hampton's Publicly Owned Treatment Works ("POTW") by the Town of Hampton under Industrial Discharge Permit No. 2023-A ("Industrial Discharge Permit"). Part 1.D.10 of the Industrial Discharge Permit prohibits the discharge of "any water from storm water flow that may leak into pump station wet wells or tanks". In addition, Part 1.G. of the Industrial Discharge Permit states: "no sanitary sewer shall be used to receive and convey or dispose of any storm or surface water, or any other uncontaminated or unpolluted discharge." The Pump Station #2 access cover is situated at the bottom of a grass depression where stormwater may pool and infiltrate around the access cover. As discussed during the facility inspection, stormwater infiltrates via the access cover and is discharged to the POTW. Provide a plan or report describing the actions taken to prevent stormwater from entering Pump Station #2, in compliance with the Industrial Discharge Permit for AJ Nonwovens.

2. Stormwater Regulations (40 C.F.R. § 122.26) – Multi-Sector General Permit (MSGP) ID NHR053211

- A. The site map in the Facility's Storm Water Pollution Prevention Plan ("SWPPP") depicts Outfall 003 at an inlet structure north of the Manufacturing Building; however, the Notice

of Intent("NOI") for the Facility identifies latitude and longitude coordinates of Outfall 003 at the discharge point of Drainage Area 4. Correct this discrepancy within the Facility's site map to match the outfall location as identified in the NOI. Additionally, it was discussed that quarterly stormwater assessments were conducted at the improper outfall location, resulting in the consistent reporting of NODI code C: no discharge. Resume quarterly stormwater assessments at the correct Outfall 003 location as defined in the Facility's NOI.

- B. Section 2.1.2.2 of the MSGP ("Good Housekeeping") requires that the Facility must keep clean all areas that are potential source of pollutants, and that the Facility also must perform good housekeeping measures to minimize pollutant discharges. Describe what actions the Facility will take to address the deficiencies identified below:
- a. EPA inspectors observed areas throughout the site to have accumulated fleck material on paved areas near drains and stormwater outfall locations. Part 2.1.2.2.a. of the MSGP requires permit holders to sweep or vacuum at regular intervals or, alternatively, wash down the area and collect and/or treat, and properly dispose of the washdown water.
 - b. EPA inspectors observed uncovered roll-off containers. Part 2.1.2.2.c. of the MSGP requires permit holders to keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids and could leak, ensure that discharges have a control (e.g., secondary containment, treatment).
 - c. EPA inspectors observed raw, pre-processed plastic material stored outside, without cover, on top of pallets. Part 2.1.2.2.d. of the MSGP requires that facilities that handle pre-production plastic must implement control measures to eliminate discharges of plastic in stormwater. Materials included in this requirement are plastic resin pellets, powders, flakes, additives, regrind, scrap, waste, and recycling.
- C. Within the Facility's Drainage Area 6, a discharge was observed leaving the site at the time of the inspection which flowed west, towards the Drakes River. Submit a Change NOI to reflect this discharge as an additional outfall. Identify in your response all pollution sources within this drainage area and reflect these in the Facility's SWPPP.
- D. Within the most northeastern area of Drainage Area 3 and closest to Lafayette Road, EPA inspectors observed that the site's topography allows runoff from the materials storage area and creates a flow path of discharge west into a wooded area. Correct the flow lines on the SWPPP's site diagram.

Technical questions and concerns may be directed to Damian Bednarz at (617) 918-1482 or via email at bednarz.damian@epa.gov. Legal issues may be directed to Jeff Kopf, Senior Enforcement Counsel, at (617) 918-1796.

Sincerely,

**NEWTON
TEDDER**

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NEWTON TEDDER
Date: 2024.02.14
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Newton Tedder,
Acting Manager Water Compliance Section 1
Enforcement and Compliance Assurance Division

ENCLOSURES

1. Inspection Report for December 7, 2023, EPA Inspection
2. Stormwater photo log for December 7, 2023, EPA Inspection
3. AJ Nonwoven's Stormwater Pollution Prevention Plan, Site Drainage Plan
4. BOD, TSS & Ammonia Analytical Results

cc: Tracy L. Wood, NHDES
Jeff Kopf, US EPA
Damian Bednarz, US EPA
Shannon Shea, US EPA