



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. Rich Knapp, Regulatory Compliance Officer
New England Wire Technologies Corporation
130 North Main Street
Lisbon, NH 03585
rich.knapp@newenglandwire.com

Re: Clean Water Act Inspection on September 22, 2021

Dear Mr. Knapp:

On September 22, 2021, the U.S. Environmental Protection Agency (“EPA”) conducted an announced inspection at New England Wire Technologies Corporation’s facility located at 130 and 145 North Main Street in Lisbon, New Hampshire (“the Facility”).

EPA inspectors viewed Facility metal finishing and plastic molding & forming 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 plastic molding & forming (contact cooling) process lines from the Riverside manufacturing building at 145 North Main Street. See Attachment for results. Inspectors also reviewed the Facility’s stormwater pollution prevention plan (SWPPP) and oil spill prevention, control, and countermeasure (SPCC) plan interim report.

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.

- Currently, the Facility doesn’t meet the federal definition of a Significant Industrial User (SIU) under 40 C.F.R. §403.3(v). The Facility’s silver and tin electroplating processes are zero-discharge categorical unit operations. If the operation/s should change and begin introducing wastewaters into a Publicly Owned Treatment Works (POTW) then the Facility would become a Categorical Industrial User/Significant Industrial User. The EPA is requesting the Facility provide voluntarily to EPA a zero-discharge certification statement for electroplating wastewaters. The certification statement would be submitted at least annually to EPA and should be prepared in accordance with 40 C.F.R. §403.6(a)(2)(ii).
- While the Facility is not a SIU, the federal Pretreatment Regulations require all Industrial Users to promptly notify the Control Authority (EPA and POTW) ... in advance of any substantial change in the volume or character of pollutants in their discharge, 40 C.F.R. §403.12(j). This requirement applies to the Facility.
- Currently, 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. Facility personnel should review EPA's *Control of Slug Loadings to POTW Manual*¹, particularly the information pertaining to employee training program for reporting and responding to an accidental chemical spill to the POTW.

- On September 22, 2020, the Facility submitted/filed a conditional exclusion for no exposure (NOE) under EPA's NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP), the regulations for which can be found at 40 C.F.R. §122.26(g). The NOE only identifies the Facility's 130 North Main Street/Trackside Plant. The Facility may have inadvertently forgot to include on the NOE under Facility Information the property located at 145 North Main Street/Riverside Plant. The Facility should review its operations at the location and determine if a NOE is needed at its Riverside Plant.

The current NOE (NHNOE3250) remains in effect and will expire on September 22, 2025, unless your facility becomes unable to maintain its eligibility for an exclusion sooner than that date. If changes at a facility result in industrial activities or materials becoming exposed, the no exposure exclusion ceases to apply. Currently, there did not appear to be industrial activities or materials exposed to precipitation or other source of pollutants to the environment. Even through the Facility maintains a no exposure exclusion status, Facility personnel should periodically review EPA's *Guidance Manual for Conditional Exclusion from Stormwater Permitting*². The Facility

- EPA inspectors observed several oil-filled containers, drums and equipment and were informed by Facility personnel that the Facility may have total oil storage capacity greater than 1,320-gallons. At the time of the inspection Facility personnel were unable to provide EPA inspectors with a Spill Prevention, Control, and Countermeasure (SPCC) plan. On October 14, 2021, the Facility provided EPA with an oil SPCC Plan Interim Report, dated November 11, 2016, and informed the EPA that the document was never finalized. On October 19, 2021, the Facility acknowledged receipt of an EPA document entitled Notice of SPCC Inspection with Deficiencies. Inspector Canzano informed Mr. Knapp by way of an October 21, 2021 email that the Facility's responsibility is to develop and implement a SPCC plan as soon as possible, and to respond to the Notice no later than November 19, 2021 regarding the Facility's progress for finalizing the SPCC plan.

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 or you can reach him by telephone at (617) 918-1763.

Sincerely,

NEIL HANDLER
Digitally signed by NEIL
HANDLER
Date: 2021.11.12 14:02:57
-05'00'

Neil Handler, Senior Enforcement Coordinator
Enforcement & Compliance Assurance Division

Enclosures: (electronic)
Images and Pictures

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

² <https://www.epa.gov/npdes/guidance-manual-conditional-exclusion-stormwater-permitting-based-no-exposure-industrial>

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