



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Sent via Electronic Mail (*Dated as shown on electronic signature*)

Gina Piccirilli, Director
Weber Auto and Truck Parts Corporation
135 Island Pond Road
Derry, New Hampshire 03038
gina@weberautoparts.com

Subject: November 7, 2023 EPA Inspection of Weber Auto and Truck Parts

Dear Ms. Piccirilli:

On November 7, 2023, the U.S. Environmental Protection Agency Region 1 ("EPA") performed an inspection at Weber Auto and Truck Parts Corporation located at 135 Island Pond Road in Derry, New Hampshire (the "Facility"). The purpose of EPA's inspection was to evaluate the Facility's compliance with the National Pollutant Discharge Elimination System ("NPDES") Program of the Clean Water Act. A copy of the inspection report is included as an attachment to this letter along with a photo album.

The industrial activities taking place at the Facility are classified under Sectors M, N, and F of the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity ("MSGP"). EPA notes that the Facility is covered under the 2021 MSGP (ID NHR053298) and submitted to EPA an electronic copy of its Storm Water Pollution Prevention Plan ("SWPPP") on November 9, 2023.

Within 30 days of receipt this letter, provide written responses to the following questions to my staff at rosenberg.alex@epa.gov.

1. Inspectors were unable to safely walk the perimeter of the site because buses and trailers were parked along a majority of its length. The Facility's SWPPP states in Section 3.1 that "stormwater is generally retained on site within stormwater detention berms." However, a potential stormwater discharge could occur from Discharge Point 001 located at the southern portion of the site property identified on the Facility's SWPPP Site Plan. Section 4.1.1 of the Facility's SWPPP states that "[b]erms are constructed around the property to retain stormwater and potential pollutants on site or restrict the release of stormwater through Discharge Point 001." Submit photographic evidence of the berm (and its continuous nature surrounding the site), discharge point 001, and the flow paths from every vehicle storage area identified by a "2" on the Facility's SWPPP Site Plan.
2. Section 5.6.2 of the Facility's SWPPP states that "[a]t least once each calendar year, the routine facility inspection will be conducted during a period when stormwater discharge is occurring." Submit documentation from the last two Facility inspections that were

conducted during a rain event. Ensure the facility representative Who conducted the inspections is identified.

3. Provide justification as to why for every sampling for the entirety of the current permit cycle (since July 2021), the Facility has submitted the no data indicator code “C” on the Facility’s discharge monitoring reports, representing that no discharge occurred at outfall 001. Historic rain event records show that many large-scale precipitation events occurred since July 2021. Include in the justification the amount of rainfall that fell on each of the last year’s inspection dates (March 16, 2022; June 8, 2022; September 21, 2022; and December 14, 2022), and identify what method of weather forecasting the Facility uses to determine the optimal time to inspect and monitor stormwater flows.
4. The Facility’s SWPPP lists pollution prevention team members by title and job description. Submit an organization chart identifying the individuals who fill each position title on the storm water pollution prevention team.

Please refer any questions related to the technical issues addressed in this letter to Alex Rosenberg at 617-918-1709 or rosenberg.alex@epa.gov. Legal issues may be directed to Sam Horowitz, Enforcement Counsel, at (617) 918-1512 or horowitz.samuel@epa.gov.

Sincerely,

TODD BORCI Digitally signed by TODD BORCI
Date: 2023.12.19 13:20:10 -05'00'

Todd Borci, Manager
Water Compliance Section 1
Enforcement and Compliance Assurance Division

Enclosures:
Inspection Report
Inspection Photo Album

CCs (electronic only):
Laurel Pushee, NHDES
Sam Horowitz, Enforcement Counsel, US EPA
Alex Rosenberg, Enforcement Counsel, US EPA