



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

Enforcement & Compliance Assurance Division
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Subj: Facility Inspection Report - Clean Water Act

Inspector: Joseph Canzano, Inspector
Enforcement & Compliance Assurance Division ("ECAD")

**Canzano,
Joseph**

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Canzano, Joseph
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I. Facility Information

A. *Facility Owner:* Burndy, LLC

B. *Facility Operator:* Burndy, LLC (the "Facility")
34 Bern Dibner Drive
Lincoln, NH 03251

44°2'54.66" N
71°40'59.64"W

C. *Facility Operator
Contacts:* James Bailey, Plant Health, and Safety Manager
JBailey3@hubbell.com
(603) 647-5218

Kevin Wheeler, Plant Manager
KWheeler2@hubbell.com
(603) 647-5218

D. *ID Nos.:* NPDES¹ Industrial Pretreatment (NHPIU0013)
NPDES Stormwater (NHR05J01D)
National Oil Data Base (R1-NH-00306)
Facility Registry Service Number (110000581308)

II. Background Information

E. *Date of inspection:* October 23, 2023

¹ National Pollutant Discharge Elimination System

- F. *Weather Condition/s:* Overcast, 45-degree Fahrenheit
Previous 30-Day Rain Events²:
October 21st – 1.42”
- G. *US EPA Inspectors:* Joseph Canzano, Shannon Shea, and Nafisah Ali
- 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, Industrial Stormwater Regulations
 - NPDES-Industrial Multi-Sector General Permit
 - 40 C.F.R. Part 403, General Pretreatment Regulations
 - 40 C.F.R. Part 433, Metal Finishing Regulations

III. Type and Purpose of Inspection

The purpose of the site inspection was to view company operations associated with oil storage and transfer activities, locations where portable and/or mobile oil storage containers are positioned, spill containment and runoff controls for exposed industrial operations and activities, and runoff compliance monitoring locations. The inspection also included reviewing the Facility’s wastewater treatment system for process wastewaters introduced into the Publicly Owned Treatment Works (“POTW”) and compliance monitoring locations.

IV. Disclaimer

Unless otherwise noted, this report describes conditions observed by EPA inspector/s, 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 and activities ongoing at the Facility. This report does not make final determination/s on potential areas of concern and/or deficiencies. Nothing in this report affects EPA’s authorities under federal statutes and regulations to pursue further investigations.

V. Pre-inspection Facility File/Information Review

Records show EPA inspected the Facility on July 19, 2005, and February 26, 2014. The inspections reviewed operations and activities relating to federal stormwater, pretreatment, and oil storage regulations. On October 10, 2023, prior to the inspection, EPA provided a copy of the 2014 report to a Facility representative.

² <https://www.wunderground.com/dashboard/pws/KNHLINCO23/table/2023-09-22/2023-09-22/monthly>. The inspector selected daily rainfall amount recorded greater than ¼-inch.

Federal Emergency Management Agency (“FEMA”) flood hazard area records³ are not available for areas neighboring the Facility. The Facility, due to its proximity to the Pemigewasset River, has reasonable potential to discharge pollutants including oil directly and/or indirectly to a bordering unnamed tributary/swale that drains to the Pemigewasset River. EPA recommends that Facility representatives review the property for materials stored or operations occurring in potential areas subject to flooding/elevated water levels and, if possible, move vulnerable materials above potential flood elevation. For more information about preparing for natural disasters and resilience you can go to: <https://www.epa.gov/natural-disasters/flooding>, and https://www.epa.gov/sites/default/files/2015-08/documents/flood_resilience_guide.pdf.

Under 40 C.F.R. § 122.26(b)(14)(i)-(xi), stormwater discharges associated with certain categories of industrial activity are required to be covered under a NPDES permit, unless otherwise excluded. Facility operations, as reported by the Facility, fall under Category Eleven (xi) which is light manufacturing. Public information indicates the Facility’s primary standard industrial code is 3643, Current-Carrying Wiring Devices, which is an identified code in EPA’s 2021 Multi-Sector General Permit (“2021-MSGP”).

On June 2, 2021, the Facility completed a federal Notice of Intent (“NOI”) form for reapplying for NPDES permit coverage under EPA’s 2021-MSGP. EPA records show the Facility had permit coverage under EPA’s 2015-MSGP. On August 1, 2021, EPA notified the Facility that discharge authorization for stormwater and allowable non-stormwater associated with industrial activity under the 2021-MSGP has commenced and the Facility’s NPDES identification number is NHR05J01D. Facility stormwater discharges are categorized under Sector AC – Electronic and Electrical Equipment and Components, Photographic and Optical Goods in the 2021-MSGP.

The Facility is submitting to EPA stormwater discharge monitoring reports (“DMRs”) on a quarterly basis for Outfall 001 and Outfall 006 for indicator monitoring pollutants identified in Table 8.AC-1 in the 2021-MSGP. Pollutants include hydrogen ion concentration (“pH”), chemical oxygen demand (“COD”) and total suspended solids (TSS)⁴. The most recent report was submitted on July 10, 2023, for 2nd quarter 2023 (April 2023 through June 2023). Additionally, the Facility is submitting annual stormwater reports. Reports were submitted on February 2, 2023, for the 2022 reporting year, and January 20, 2022, for the 2021 reporting year. Part 7.2 of the 2021-MSGP requires reports be submitted into EPA via NeT-MSGP system no later than January 30th of each year for the past calendar year.

On November 10, 2023, the Facility provided EPA with routine facility and visual assessment stormwater inspection reports from January 4, 2023, through November 7, 2023, and assessment reports from September 15, 2021, through September 29, 2023. Routine reports should include time of inspection, a description of any discharges occurring at the time of the inspection, and observations regarding the physical condition of and around all stormwater discharge points ... and evidence of pollutants in discharges and/or the receiving water/s. Additionally, reports should

³ <https://msc.fema.gov/portal/home>.

⁴ Table 8.AC-1 in 2021-MSGP.

include stormwater control measures ... implemented since previous inspection, e.g., pavement sweeping/cleaning, see Part 3.1.6 of the 2021-MSGP.

The visual assessment report for June 9, 2022, shows pH result of 5.37 Standard Units (“S.U.”) at Outfall 1, and 5.07 S.U. at Outfall 002. Surface water quality limitations are between 6.0 S.U. and 9.0 S.U. Results are not within the acceptable range and may have been a signal for stormwater contamination and the report should have addressed a probable source. Assessment reports should also indicate if the sample collected is collected within the first 30 minutes of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes and the reason why it was not possible to take the sample within the first 30 minutes must be documented. In the case of snowmelt, samples must be taken during a period with a measurable discharge, see Part 3.2.2.2 of the 2021-MSGP.

EPA was provided with the Facility November 10, 2023, Stormwater Pollution Prevention Plan (“SWPPP”). The inspector reviewed the Plan and offers the following: add into Section 1.3 of the Plan, “Indicator Monitor Sampling” and “Routine Facility Inspections” under Individual Responsibilities, and the Site Diagram in Attachment B of the Plan should show location for monitoring points for indicator monitoring pollutants, locations of ... discharge points ... indicating if you are treating one or more discharge points as “substantially identical”, and municipal storm sewer system and where Facility stormwater discharges to them, see Part 6.2.2.3 in the 2021-MSGP. Additionally, the Site Diagram shows parts of the building roof area included in certain outfall drainage areas. however, the SWPPP does not discuss drain paths from building roof drains.

According to EPA records, the Facility has been in operation and introducing federally regulated categorical metal finishing wastewaters into the Town of Lincoln’s Publicly Owned Treatment Works (“POTW”) prior to July 1983. The Facility has submitted to EPA information indicating it generates metal finishing process wastewaters from electroplating, and chemical etching operations. Process wastewaters from the Facility are treated prior to being introduced into the POTW. Facility metal finishing wastewaters are limited by, among other things, federal pretreatment existing source standards at 40 C.F.R. Part 433, Metal Finishing Point Source Category Regulation, and certain other standards and reporting requirements in EPA’s General Pretreatment Regulations at 40 C.F.R. Part 403.

The Facility periodically reports to EPA effluent flow volume and total copper amounts, and results for other metal finishing standards, i.e., total chromium, lead, zinc, cyanide etc. Flow and copper amounts are submitted monthly whereas results for other metal finishing standards are submitted twice per year. In accordance with 40 C.F.R. § 403.12, the Facility provided the inspector with 3-years of effluent results for treated wastewaters introduced into the POTW, i.e., August 2020 through October 2023.

The Facility provided EPA with a July 23, 2003, oil Spill Prevention, Control and Countermeasure (SPCC”) plan amended November 10, 2023. Plan comments are provided in an attachment entitled SPCC Field Inspection and Review Checklist. The plan meets the minimum requirements of the Rule. According to the plan, the total oil storage capacity for the Facility is 8,888-gallons, the

largest-single oil storage tank is for a 600-gallon emergency power generator, and potential spill path/s are to the Pemigewasset River. The Facility also uses a 12,000-gallon underground storage tank for heating the building.

Under 40 C.F.R § 112.3(g) the Facility is a Tier I qualified facility. Although the Facility meets the qualification criteria to self-certify, Burndy, LLC has chosen to maintain a P.E. certified SPCC Plan.

VI. In-Briefing

On October 10, 2023, EPA (Joseph Canzano) contacted James Bailey, Health and Safety Manager for Burndy, LLC (“Burndy”) to announce an October 23, 2023, EPA inspection. On October 17, 2023, EPA requested pretreatment periodic reports on continued compliance for previous 3-years. On November 3, 2023, EPA received the reports.

On October 23, 2023, EPA inspectors Shannon Shea, Nafisah Ali, and Joseph Canzano arrived at the Facility at approximately 9:00 a.m. and were greeted by company representatives Brian Donovan, Director of Environmental Health and Safety, Kevin Wheeler, Plant Manager, James Bailly, Plant Environmental Health and Safety Manager, and Russell Merrick, Facilities Maintenance Team Leader. Engineering consultants for the Facility from Brown and Cadwell also participated in the inspection.

Inspectors presented credentials and requested permission to conduct a site inspection. Facility representatives granted access. The group then reviewed health and safety protocols and logistics for conducting the inspection. Inspector Canzano explained the purpose of the inspection and informed the Facility representative it will include, but not limited to, a review of Facility oil storage and transfer operations, stormwater runoff locations, potential spill path/s to surface waters, monitoring outfalls, location of industrial activities and materials exposed to rain, and wastewater treatment system and monitoring location for industrial wastewaters introduced into the POTW. Certain implementation records may be requested following the inspection, and pictures may be taken during the site walk.

Facility personnel explained the Facility is a fastener manufacturer of electrical connectors for the electric utility industry. Most of the connectors are made of copper and aluminum and coated in tin, nickel, or copper. The Facility employs approximately 230 employees and typically operates three shifts per day, five days per week plus a fourth shift on the weekends. The Facility has annual capacity to process approximately 1.2 million pounds of aluminum and 4.2 million pounds of copper in rods. The Facility is a 102,000-square foot, single-story manufacturing building that includes a wastewater treatment plant, metal finishing operations, hazardous waste, and material storage areas, loading docks, groundwater treatment plant, and parking and landscaped areas. Additionally, the unnamed tributary skirts along the northern and western side of the property in which the stormwater outfalls discharge into and eventually drains into the Pemigewasset River.

Compliance monitoring reports for metal finishing standards including cyanide indicate cyanide samples are collected automatically at the end of the wastewater treatment and at a point labeled Outfall 001 shown a Facility Wastewater Treatment Flow Diagram. Inspector Canzano informed

Facility personnel sampling for cyanide may not be occurring in the proper compliance monitoring location. Facility compliance monitoring reports for cyanide do not include an adjustment calculation based on the dilution ratio of the cyanide waste stream flow to the final effluent flow. Under 40 C.F.R. § 433.12(c), self-monitoring for cyanide must be conducted after cyanide treatment and before dilution with other streams. Alternatively, samples may be taken of the final effluent, if the plant limitations are adjusted based on the dilution ratio of the cyanide waste stream flow to the effluent flow.

Production processes include, but are not limited to, metal cutting, tampering, annealing, and flattening, vibratory deburring, electroplating and chemical etching. Certain processes generate wastewaters which require treatment. According to effluent flow records, the Facility introduces a daily average 35,653-gallons of treated process wastewaters into the POTW. The wastewater treatment plant generates hazardous waste sludge. According to Facility personnel the operation generates about 30-yards of hazardous waste sludge every 5-weeks.

VII. Site Inspection

The site inspection started by Facility representatives walking EPA's inspection team around the exterior of the plant. The second part of the day, after lunch, would be for viewing industrial wastewater treatment operation/s and monitoring location/s.

Inspectors walked around the Facility in a clockwise direction beginning at Stormwater Outfall 001. Facility representatives informed inspectors Outfall 001 is one of two monitoring locations for collecting samples for stormwater indicator monitoring pollutants. Samples are collected by Facility personnel in pre-preserved sample bottles and then taken to an outside state certified laboratory for analysis.

Outfall 001 is a roadside square catch basin that collects runoff from an access road and portion of guest parking area and is in the southwest corner of the property. Most of the area is asphalt paved. Facility representatives showed inspectors an electrical transformer, and two storm drains that gather runoff from the area and divert flow to the manhole for Outfall 001.

According to the SPCC plan, the manhole/Outfall 001 discharges to the unnamed tributary that discharges to the Pemigewasset River. A release conveyed to this outfall could possibly discharge to the Pemigewasset River. Inspector Canzano said the catch basin may be connected to the municipal street storm drain system which discharges into the Pemigewasset River. If the catch basin to Outfall 001 is connected to the municipal drain system, then the connection should be identified in the SWPPP site diagram. Inspector Canzano recommends a sign be posted, taking snowfall amount into consideration, for identifying Outfall 001 location.

Facility representatives walked inspectors to the Stormwater Outfall 002 location. Outfall 002 is not monitored for stormwater indicator pollutants. The location of Outfall 002 is at the edge/corner of a paved area used for employee parking and industrial operations and activities, and about ~200-feet from the west side of the building. Industrial activities observed included a transfer station for a 12,000-gallon underground heating oil ("No. 2") tank ("UST"). Facility representatives informed inspectors the tank is registered with the state underground tank program. Inspector Canzano

recommends marking of the fill port and plate cover using industrial standard color for type of oil and stage a spill response scenario for employees for a worst-case release from a tanker truck offloading heating oil into the UST and/or diesel oil into the emergency power generator unit/s and prevention measure for protecting the Pemigewasset River.

Adjacent to the UST loading area, against the building and under cover in a shed, Facility representatives showed inspectors three electrical transformers which contain more than 55-gallons of dielectric oil. Also observed is a recently installed new emergency power generator and the old temporary generator. Oil tank capacity for each generator and transformer is identified in the SPCC plan. The new generator oil tank capacity is 609-gallons while the oil tank capacity for the temporary tank is 250-gallons. Both use diesel fuel oil. Along the west side of the plant are stacks and vents for plant plating and wastewater treatment operations.

The industrial activities within the drainage area are unique to Outfall 002. The area for Outfall 002 is an area where potential spills and leaks could occur. Inspector Canzano recommends Outfall 002 become a monitoring location for collecting samples for stormwater indicator monitoring pollutants. Facility representatives showed inspectors topography of the land and runoff path at Outfall 002 and an embankment which channels runoff into an unnamed tributary which flows into the Pemigewasset River. Inspector Canzano recommends oil absorbent spill material be kept near the Outfall location and to train employees to deploy material.

While walking along the west side of the building, along an access road, Facility representatives tell inspectors runoff from the area (drainage area 003) enters the woods and does not discharge.

Facility representatives walked inspectors to the back (north side) of the building. Facility representatives showed inspectors Stormwater Outfall 004 location. Outfall 004 is a pipe located at the northern edge of the property. Outfall 004 is not monitored for stormwater indicator pollutants. The Outfall pipe receives runoff from two storm drains located in the back area of the plant. The area is paved. Facility representatives tell inspectors the discharge path/flow from the Outfall pipe flows down an embankment to an unnamed tributary which flows into the Pemigewasset River.

Industrial activities and operations observed in the drainage area for Outfall 004 include storage and material transfer area for hazardous and nonhazardous waste, waste roll off containers, portable and mobile storage containers, transportation storage boxes, equipment storage, ground water treatment building, and waste/trash compactor.

Facility representatives show inspectors a Quonset hut type storage structure (the "structure") being used for storing and filling a 30-yard roll-off container with federally identified hazardous waste, i.e., dry metal hydroxide sludge generated from the wastewater treatment system. According to a Facility Wastewater Treatment System Flow Diagram the dried sludge cake is labeled F006 and F019 for disposal. F006 is wastewater treatment sludges from certain electroplating operations while F019 is wastewater treatment sludges from the chemical conversion coating of aluminum. Facility representatives indicate the company transports off-site a 30-yard roll-off container once every 4 to 5-weeks.

Inspectors observed two roll-off containers each covered and sealed; one being stored in the structure and the other outside. Facility representatives informed inspectors the roll-off outside is empty. Dried sludge is moved from the treatment room into the structure where it is dumped into a roll-off using a fork truck and self-dumping hopper. Sludge dust can potentially be generated and released during dumping/emptying step releasing material into the air which settles on the floor of the structure. While the entrance to the structure is raised any material on the floor has potential to be tracked out of the structure and onto the pavement. Inspector Canzano recommends pavement sweeping and cleaning activities be documented on routine facility and/or visual assessment reports.

The industrial activities within the drainage area are unique to Outfall 004. The area for Outfall 004 is an area where potential spills and leaks could occur from movement of hazardous waste. Inspector Canzano recommends drain spill mats be kept near storm drain inlets, train employees to deploy spill equipment, and Outfall 004 discharge pipe become a monitoring location for collecting samples for stormwater indicator monitoring pollutants.

Facility representatives walked inspectors to the northeast corner of the property and showed inspectors Stormwater Outfall 005 location. Outfall 005 is not monitored for stormwater indicator pollutants. The location/drainage area collects surface runoff from an access road that runs along the east side of the building where there are loading docks, an equipment storage garage, chillers and condenser units, electrical transformer and a location for storing winter road treatment materials. Facility representatives tell inspectors the discharge path from the area flows along the edge of the paved access road toward the northeast corner of the property and then drains into a wooded area. Outfall 005 is estimated to be about 330-feet from the unnamed tributary. Inspector Canzano tells Facility representatives industrial activities observed along the east side of the building and within drainage area Outfall 005 is similar in nature to industrial activities in drainage area for Outfall 001.

Inspectors are shown Stormwater Outfall 006 location. Facility representatives inform inspectors Outfall 006 is the other monitoring location for collecting samples for stormwater indicator pollutants. Outfall 006 is a circular catch basin located in a truck trailer loading dock area. Facility personnel inform Inspector Canzano they are unsure of the ultimate discharge/drain path for runoff entering the catch basin. The inspection team observes two other drains within the loading dock area. Inspector Canzano requests the Facility determine the ultimate discharge/drainage path for all drain/s and show on SWPPP, SPCC site and/or process flow diagrams. Inspector Canzano also informs Facility personnel that Outfall 006 may not be a representative location for sampling for stormwater indicator pollutants if the catch basin/s are determined to be a dry well/s and do not discharge to surface waters.

End of exterior site walk, and the inspection team leaves the building for lunch. Facility personnel and inspection team agree to resume the inspection at 1:00 p.m.

Inspectors reenter the building and resume the inspection with Facility personnel. Facility personnel show inspectors a parshell flume which is used for flow measurement and compliance monitoring location for treated wastewaters introduced into the POTW. The location is labeled Effluent Outfall 001 to POTW on a Facility Wastewater Treatment System Flow Diagram. The

sampling suction line to the sampler is observed to be dirty and stained and the automatic sampler was unrefrigerated. Inspector Canzano recommends the suction line be replaced and sampler remain in working order. Inspector Canzano informs Facility representatives an EPA sampling team may in the future request to enter the Facility, unannounced, to collect a wastewater effluent sample at Outfall 001.

Facility representatives show Inspector Canzano the cyanide wastewater destruct treatment system. The system treats wastewaters from cyanide electroplating and rinse tanks, certain floor drains in the cyanide plating area/s, and a cyanide wet fume scrubber. Wastewaters drain into a 50-gallon sump prior to being pumped through the cyanide destruct system. Facility representatives did not know the flow rate/volume for wastewaters entering or exiting the system. Inspector Canzano suggested obtaining a flow rate specification from sump pump/s.

The cyanide destruct system consists of two 350-gallon rectangular tanks arranged in series. According to a Facility Wastewater Treatment System Flow Diagram, sodium hydroxide, sodium hypochlorite and sulfuric acid is added to the tanks from chemical drums using chemical dosing pumps. The reduction process from cyanide to cyanate to carbonate and nitrogen is monitored with pH and oxygen-reduction potential (“ORP”) probes. Effluent from the system then flows into a 3,500-gallon collection chamber and mixes with other waste streams including non-cyanide electroplating process and rinse tanks, floor drain/s, wet fume scrubber/s and other dilute⁵ and/or unregulated streams.

Flow rate volume for other dilute and unregulated streams mixing with regulated streams in the collection tank may be unknown. Under 40 C.F.R § 403.6(d), except where expressly authorized to do so by an applicable Pretreatment Standard or Requirement, no Industrial User shall ever increase the use of process water, or in any other way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with a Pretreatment Standard or Requirement. The Control Authority may impose mass limitations on Industrial Users which are using dilution to meet applicable Pretreatment Standards or Requirements, or in other cases where the imposition of mass limitations is appropriate. Under 40 C.F.R § 403.6(e), where process effluent is mixed prior to treatment with wastewaters other than those generated by the regulated process, fixed alternative discharge limits may be derived by the Control Authority or by the Industrial User with the written concurrence of the Control Authority. These alternative limits shall be applied to the mixed effluent. Inspector Canzano recommends the Facility evaluate and determine the amount of dilute and unregulated wastewater streams that mix with regulated process streams prior to treatment. The Facility should refer to EPA Guidance Manual for Use of Production-Based Pretreatment Standards and the Combined Wastestream Formula, September 1985, <https://www3.epa.gov/npdes/pubs/owm0260.pdf>.

Facility personnel show Inspector Canzano the Facility’s wastewater treatment system. The system includes metals chemical precipitation and flocculation and sludge press treatments. Wastewater in the 3,500-gallon collection chamber is gravity feed or pumped through a series of tanks (12-gallon equalization, 4,100-gallon pretreatment, and two 3,300-gallon tanks for neutralization and

⁵ Under 40 C.F.R. § 403.6(e) - boiler blowdown streams, non-contact cooling streams, stormwater streams, and demineralizer backwash streams.

equalization) prior to being pumped into a 3,500-gallon Lamella inclined plate clarifier. Chemical addition of sodium hydroxide, sulfuric acid, polymers, coagulants and flocculants occurs, and the treatment process is monitored with pH and ORP probes. Treatment chemicals are added to certain tanks from drums and chemical dosing pumps. The effluent from the clarifier is further treated using sand filters, then flows through the Parshell Flume (Outfall 001) and then to the POTW.

In the wastewater treatment system room, the Facility operates an evaporator unit for certain waste streams. Inspector Canzano recommended the unit operation be shown on the Facility Wastewater Treatment System Flow Diagram. Inspector Canzano did not request copies of operation and/or maintenance logs for the treatment system.

VIII. Closing Conference

- Following the site walk, the following issues and observations were communicated to company representatives:
- NPDES stormwater sampling locations may not be correct for indicator monitoring pollutants. The Facility is monitoring and reporting for Outfall 001 and Outfall 006. Outfall 001 is like Outfall 005, and Outfall 006 may not have a discharge. Outfall 002 and Outfall 004 are unique, not identical and represent industrial activities and operations occurring in each drainage area. Facility should change monitoring locations and SWPPP should be reviewed and amended. Facility should submit updated Notice of Intent to NetMSGP to reflect these changes.
- The Facility is monitoring for total cyanide amount introduced into the POTW in the wrong location. Pretreatment regulations require self-monitoring for cyanide must be conducted after cyanide treatment and before dilution with other streams. EPA is requesting the Facility amend a new pretreatment baseline monitoring report and treatment and production industrial process flow diagrams and submit to EPA.
- The Facility is sending EPA via mail pretreatment periodic reports on compliance. Moving forward, the Facility is instructed to electronically submit reports via e-mail to Joseph Canzano at canzano.joseph@epa.gov and R1.ECAD.pretreatment@epa.gov. Reports shall include information outlined in the attached document, EPA Region I Pretreatment Monitoring and Reporting Procedures Metal Finishing Point Source Category.
- The inspectors exited the Facility at approximately 3:00 p.m. End of report.