



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

Ref: 8ENF-W-NW

SENT VIA EMAIL
DIGITAL READ RECEIPT REQUESTED

Monte Paddleford, President
Eagle Bronze, Inc.
monte@eaglebronze.com

Re: Inspection Report for Eagle Bronze, Inc., NPDES Identification No. WYPF00101

Dear Mr. Paddleford:

On July 2, 2021, representatives of the U.S. Environmental Protection Agency inspected the Eagle Bronze, Inc. facility in Lander, Wyoming to determine compliance with the facility's Notice of Discharge Requirements and the metal finishing pretreatment requirements. The inspection was conducted under the authority of Section 308 of the Clean Water Act (Act). Enclosed is a report of the inspection.

Inspection findings are summarized within the enclosed inspection report in a table titled "Findings, Corrective Actions, and Recommendations." Within **thirty (30) days** of receipt of this report, please provide the EPA with a summary of any actions taken to address the findings identified in the report and any information which may change the findings or content of the report. This summary should be sent to:

Kristin Ratajczak
NPDES and Wetlands Enforcement Section
U.S. EPA Region 8
ratajczak.kristin@epa.gov

Jessica Duggan
NPDES and Wetlands Enforcement Section
U.S. EPA Region 8
duggan.jessica@epa.gov

A Small Business Regulatory Enforcement and Fairness Act (SBREFA) information sheet containing information on compliance assistance resources and tools available to small businesses is enclosed with this letter. The inclusion of this information sheet does not necessarily mean that the EPA has determined that Eagle Bronze, Inc. is a small business.

The EPA acknowledges the COVID-19 pandemic may be impacting your work. If there is reason to believe current conditions prevent you from meeting the timeline specified above, please notify the EPA and we will consider your specific circumstances in adjusting the timeline for response submittal.

Please contact me at 303-312-6310 or ratajczak.kristin@epa.gov if you have any questions regarding this letter or the enclosed report.

Sincerely,

KRISTIN
RATAJCZAK

Digitally signed by
KRISTIN RATAJCZAK
Date: 2021.09.13 08:00:36
-06'00'

Kristin Ratajczak
NPDES and Wetlands Enforcement Section
Enforcement and Compliance Assurance Division

Enclosures:

- 1) NPDES Pretreatment Industrial User Inspection Report
- 2) Photo Log
- 3) SBREFA Information Sheet

NPDES Pretreatment Categorical User Inspection Report

National Database Information	
Inspection Date: 7/2/2021	Inspection Type: Pretreatment Categorical Industrial User
Entry/Exit Time: 10:00 am / 11:45 am	NPDES ID Number: WYPF00101
Inspection ID: 202107 WYPF00101	
Lead inspector and affiliation: Kristin Ratajczak, EPA Region 8	
Inspector and affiliation: Jessica Duggan, EPA Region 8	

Facility Location Information <i>(Name/Location/ Mailing Address)</i>	
Site/Facility Name & Location: Eagle Bronze, Inc. 130 Poppy Street Lander, Wyoming 82520	Email Report to: Monte Paddleford, President Eagle Bronze, Inc. monte@eaglebronze.com

Contact Information	
	Name(s)/Title
Facility Contacts: <i>(indicate whether present during inspection)</i>	Monte Paddleford, President (present)
	Deni Castillejo, Administrative Support (not present)
Person/Company meeting definition of Owner/Operator	Eagle Bronze Foundry and Gallery
Authorized Official(s)	Monte Paddleford, President

Areas Evaluated During Inspection		
Permit	Effluent/Receiving Waters	Compliance Schedule
<u>Records/Reports</u>	<u>Flow Measurement</u>	Pollution Prevention
<u>Facility Site Review</u>	<u>Self-Monitoring Program</u>	Laboratory

Report Review and Signature		
Drafter Name	Address/Phone Number	Date
Kristin Ratajczak	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	9/8/2021
	303-312-6310	
Reviewer Name	Address/Phone Number	Date
Jessica Duggan	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	9/9/2021
	312-353-6195	
Supervisor Signature/Name	Address/Phone Number	Date
	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	9/10/2021
Michael Boeglin	303-312-6250	

Inspection Narrative and Site Description

On Friday July 2, 2021, the U.S. Environmental Protection Agency (EPA) conducted a compliance evaluation inspection at Eagle Bronze, Inc. (Eagle Bronze or facility), located in Lander, Wyoming, to evaluate compliance with the requirements in 40 C.F.R. Parts 403 and 433 for the General Pretreatment Regulations and Metal Finishing Point Source Category, respectively, as well as the EPA-issued Notification of Discharge Requirements (WYPF00101), which identifies the general pretreatment and non-significant categorical industrial user (NSCIU) requirements applicable to the facility. The facility is subject to regulation under 40 C.F.R. Part 433 because of the patina coloring process onsite. Though the facility performs metal molding and casting in its foundry operations, it is not subject to regulation as a Metal Molding and Casting Point Source under 40 C.F.R. 464 because it does not perform any of the operations defined in 40 C.F.R. 464.25. The EPA is responsible for direct implementation of the pretreatment program in the state of Wyoming and is the control authority for industrial users (IUs) that discharge to publicly owned treatment works (POTWs) without approved pretreatment programs. The Town of Lander does not have an approved pretreatment program; therefore, the EPA directly oversees compliance of IUs that discharge to the POTW and on September 27, 2020, the EPA issued the Notification of Discharge Requirements to Eagle Bronze (WYPF00101). The inspection was announced to the Eagle Bronze several days in advance of the inspection, to coordinate logistics.

At approximately 10:00 am, EPA inspectors Kristin Ratajczak and Jessica Duggan (jointly referred to as inspectors) arrived at the facility and met with Monte Paddleford, President of Eagle Bronze. Inspectors presented their credentials and held an opening conference with Mr. Paddleford to explain the purpose of the inspection. Inspectors proceeded to ask a series of questions to evaluate compliance. Mr. Paddleford provided an overview of the processes occurring onsite, including receipt of raw materials, wastewater generation and discharge, chemical storage and waste handling, monitoring, and shipping of the final product. Throughout the inspection, the inspectors noted their observations in a bound checklist. Photographs taken during the inspection are included in the attached photo log.

Eagle Bronze has approximately 30 employees that work Monday through Friday, from either 7:00 am to 3:30 pm or 6:00 am to 2:30 pm. The facility began operations in approximately 1985 and creates sculptures through the lost wax process. Artists create a clay or wax sculpture, then a reinforced plaster mold is made to create what the facility refers to as the mother mold. Wax is then poured into the mold. The mold is removed, and the wax is coated with a ceramic shell. The interior wax is melted out leaving behind a ceramic shell cast that molten metal is poured into to create a metal sculpture. The resulting sculpture cools at room temperature prior to being prepared for shipping. The source metal used to create the bronze sculptures is received in ingot form and contains 95% copper, 4% silica, and 1% manganese. Large sculptures are often created in pieces, and the parts are welded together to form the complete sculpture. Sculptures also undergo manual grinding and sand blasting. Scrap metal is collected and recycled. The facility also has a small vibratory tumbler the Monument Building that is used once or twice per year. When the vibratory tumbler is in operation, water and detergent are added to ceramic media, which smooth the surface of metal sculptures placed inside. At the time of the inspection, Mr. Paddleford estimated the tumbler was last used in January 2021, though he was unsure if the resulting wastewater was discharged or evaporated. Tumbling is a regulated ancillary process under 40 C.F.R. 433 and discharges from the tumbler that flow through a regulated outfall are required to be reported.

Many bronze sculptures go through a patina process which can occur in two buildings; small and medium size sculptures go through the patina process in the Main Building (photos 138, 139, 140, 141

and 142) while large sculptures that cannot fit in the main building go through the patina process in the Monument Building (photos 133 and 134). The patina process is completed through the application of sulfurated potash which oxidizes the bronze to produce a dark color on the surface of the sculpture. Sulfurated potash is mixed and applied manually onto sculptures, rubbed with rags, and rinsed off. In the Main Building, rinse water from the patina process flows through a floor drain or shop sink to a 7-gallon sump (photo 139). The height of the wastewater in the sump is measured and used to calculate the volume of the wastewater. The wastewater is discharged through Outfall 001 by manually operating the sump pump, which discharges the wastewater to the POTW. Eagle Bronze typically discharges less than 1 gallon per day, three times per week from the patina room in the Main Building. In the Monument Building, rinse water flows to a trench drain that is connected to a 35-gallon sump that is plumbed to overflow to the POTW via Outfall 002; however, Mr. Paddleford indicated that discharge from the Monument Building does not occur because rinse water generation in the building is minimal and absorbed by saw dust and solids in the trench (photos 133 and 134). There is no wastewater treatment at the facility.

Inspectors walked through the facility and observed the processes detailed above. Because the inspectors and Mr. Paddleford shared timing constraints on the day of the inspection, inspectors requested copies of records for review on a later date. The facility provided copies of records, including daily flow logs for Outfalls 001 and 002 from July 2020 - June 2021, submitted Discharge Monitoring Reports (DMRs) for Outfalls 001 and 002, past correspondence with the EPA, and the current Toxic Organics Management Plan (TOMP). A brief closing conference was held during which preliminary findings from the onsite portion of the inspection were discussed. The inspectors completed their records review on July 6-7, 2021. Inspectors offered a virtual closing conference to discuss preliminary findings related to the records review but were unable to coordinate a time that was acceptable to both parties. Rather than holding a traditional closing conference, inspectors conveyed preliminary findings to Mr. Paddleford via email on July 15, 2021.

Findings, Corrective Actions and Recommendations

Finding #1: The facility was not including discharges from the vibratory tumbler in its total flow calculations reported on DMRs.

Eagle Bronze utilized a vibratory tumbler in the Monument Building approximately twice per year, occurring most recently in January 2021 (photos 135 and 136). Because the facility performs coating, a core metal finishing process subject to 40 C.F.R. 433, wastewaters generated from ancillary processes defined in 40 C.F.R. 433.10 are also regulated. Wastewater generated from this process was likely discharged to the trench drain in the Monument Building. Eagle Bronze estimated the volume discharged was approximately five gallons per discharge. The volume of each discharge was not being recorded and reported to the EPA on DMRs, though it was unclear if the discharge flowed through Outfall 002.

Pretreatment Requirement:

40 C.F.R. 433.10(a) states, “Except as noted in paragraphs (b) and (c), of this section, the provisions of this subpart apply to plants which perform any of the following six metal finishing operations on any basis material: Electroplating, Electroless Plating, Anodizing, Coating (chromating, phosphating, and coloring), Chemical Etching and Milling, and Printed Circuit Board Manufacture. If any of those six operations are present, then this part applies to discharges from those operations and also to discharges from any of the following 40 process operations: Cleaning, Machining, Grinding, Polishing, Tumbling, Burnishing, Impact Deformation, Pressure Deformation, Shearing, Heat Treating, Thermal Cutting, Welding, Brazing, Soldering, Flame Spraying, Sand Blasting, Other Abrasive Jet Machining, Electric Discharge Machining, Electrochemical Machining, Electron Beam Machining, Laser Beam Machining, Plasma Arc Machining, Ultrasonic Machining, Sintering, Laminating, Hot Dip Coating, Sputtering, Vapor Plating, Thermal Infusion, Salt Bath Descaling, Solvent Degreasing, Paint Stripping, Painting, Electrostatic Painting, Electropainting, Vacuum Metalizing, Assembly, Calibration, Testing, and Mechanical Plating.”

Part II.A.1 of the Notification of Discharge Requirements states, “Eagle Bronze is required to monitor for flow of the process discharges from Outfalls 001 and 002 for every operating day and document the discharge quantity in gallons each day of discharge. These NSCIU Requirements allow the facility to discharge less than or equal to 100 gallons per day of regulated wastewater for any production day from Outfalls 001 and 002. An exceedance of 100 gallons per day of regulated wastewater would result in Eagle Bronze no longer being classified as an NSCIU.”

Corrective Action:

Report the flow from all processes performed onsite that are regulated under 40 C.F.R. 433. If needed, revise previously submitted DMRs to include the flow contributed to the POTW through Outfall 002 from the vibratory tumbler. In response to the EPA, indicate how the facility will address this finding.

Finding #2: There was slug discharge potential in the metal pour area.

An unprotected floor drain was present in the metal pour area (photo 131). In addition, the sink in the metal pour area was plumbed to the floor drain (photo 129). Though the floor drain was surrounded by ceramic shells, the drain presented potential for a slug discharge to the City of Lander’s sanitary sewer.

Pretreatment Requirement:

According to the requirements at 40 C.F.R. §403.8(f)(2)(vi), the POTW shall develop and implement

procedures to ensure compliance with the requirements of a Pretreatment Program. At a minimum, these procedures shall enable the POTW to, “Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User. For purposes of this subsection, a Slug Discharge 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. The results of such activities shall be available to the Approval Authority upon request. Significant Industrial Users are required to notify the POTW immediately of any changes at its facility affecting potential for a Slug Discharge. If the POTW decides that a slug control plan is needed, the plan shall contain, at a minimum, the following elements:

- (A) Description of discharge practices, including non-routine batch Discharges;
- (B) Description of stored chemicals;
- (C) Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under §403.5(b) with procedures for follow-up written notification within five days;
- (D) If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.”

Guidance:

The EPA developed a guidance manual titled Control of Slug Loadings to POTWs. Though the Notification of Discharge Requirements does not currently require Eagle Bronze to develop and implement a slug discharge control plan, the facility can reduce the risk of a slug discharge to the POTW by sealing floor drains in production areas. <https://www3.epa.gov/npdes/pubs/owm021.pdf>.

Corrective Action:

Permanently seal the floor drain or otherwise mitigate the slug discharge potential in the metal pour area. In response to the EPA, indicate how the facility will address this finding and provide photo documentation of any corrective actions taken.

Finding #3: The trench drain in the Monument Building was partially full of solids.

The trench drain in the Monument Building contained solids, reducing containment capacity for regulated process wastestreams (photo 134). When regulated rinse water enters the trench drain, it could carry excessive solids to the sump and POTW; alternatively, the trench drain could overflow, leading to a release of wastewater to the environment.

Pretreatment Requirement:

According to the requirements at 40 C.F.R. §403.8(f)(2)(vi), the POTW shall develop and implement procedures to ensure compliance with the requirements of a Pretreatment Program. At a minimum, these procedures shall enable the POTW to, “Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User. For purposes of this subsection, a Slug Discharge 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. The results of such activities shall be available to the Approval Authority upon request. Significant Industrial Users are required to notify the POTW immediately of any changes at its facility affecting potential for a Slug Discharge. If the POTW decides that a slug control plan is needed, the plan shall contain, at a minimum, the following elements:

- (A) Description of discharge practices, including non-routine batch Discharges;
- (B) Description of stored chemicals;
- (C) Procedures for immediately notifying the POTW of Slug Discharges, including any Discharge that would violate a prohibition under §403.5(b) with procedures for follow-up written notification within five days;
- (D) If necessary, procedures to prevent adverse impact from accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, worker training, building of containment structures or equipment, measures for containing toxic organic pollutants (including solvents), and/or measures and equipment for emergency response.”

Guidance:

The EPA developed a guidance manual titled Control of Slug Loadings to POTWs. Though the Notification of Discharge Requirements does not currently require Eagle Bronze to develop and implement a slug discharge control plan, the facility can reduce the risk of a slug discharge to the POTW or a spill reaching the environment by implementing good housekeeping practices and best management practices. <https://www3.epa.gov/npdes/pubs/owm021.pdf>.

Corrective Action:

Remove accumulated solids from the trench drain and arrange for proper disposal. In response to the EPA, indicate how the facility will address this finding.

Finding #4: Calculations were being performed incorrectly, resulting in inaccurate data being reported on DMRs.

Inspectors reviewed Eagle Bronze records from July 2020 to June 2021, including flow documentation, calculations, and DMRs. The EPA observed the following.

- a. Number of discharges: The total number of discharges for each month was tallied and used to calculate the average discharge; however, Eagle Bronze appeared to be using the number of discharges to the sump, rather than the number of discharges from the sump to the sanitary sewer for this summation and the resulting average calculations. In the documentation provided by Eagle Bronze, the word “pump” appeared to indicate when the sump was pumped to the sanitary sewer.
 - i. For example, the log provided to the EPA for Outfall 001 in July 2020 indicated Eagle Bronze generated wastewater from the patina process on 14 days; however, the word “pump” was written on nine occasions. Therefore, it is the EPA’s understanding that wastewater was discharged from the sump to the sanitary sewer through Outfall 001 nine times during the month.
- b. Volume of discharges: The volumes discharged to the sump that were summed for required calculations appeared to be based on the volume discharged to the sump in a calendar month; however, the volumes that should be summed for these calculations include those that were discharged from the sump to the sanitary sewer in a calendar month. Wastewater generated in

one month that was discharged to the sanitary sewer in a different month, should be added to the total for the month of discharge to the sanitary sewer.

- i. For example, the log provided to the EPA for Outfall 001 in July 2020 indicated Eagle Bronze generated 0.25 gallons of wastewater from the patina process on July 31, 2020; however, that volume of wastewater did not appear to be pumped from the sump to the sanitary sewer until the end of the day on August 3, 2020 or the beginning of the day on August 4, 2020, as indicated by the word “pump.” Therefore, the 0.25 gallons of wastewater generated on July 31, 2020 should be included in the calculations for August 2020 because that’s when it was discharged through Outfall 001.
- c. Average flow calculations: The EPA’s calculations, based Findings #4a and 4b are summarized in the table below. Items in **bold** indicate EPA calculations that differed from Eagle Bronze calculations.

Month	Eagle Bronze’s Calculations			EPA’s Calculations		
	Volume discharged, sump	Discharges to sump	Calculated average flow	Volume discharged, sump to sanitary sewer	Discharges from sump to sanitary sewer	Corrected average flow
Jul 2020	7.75 gal	14	0.554 gal/day	7.5 gal	9	0.83 gal/day**
Aug 2020	6.5 gal	10	0.65 gal/day	6.75 gal	7	0.96 gal/day
Sept 2020	6.75 gal	9	0.75 gal/day	6.75 gal	7	0.96 gal/day
Oct 2020	6.25 gal	13	0.48 gal/day	5.75 gal	6	0.95 gal/day
Nov 2020	8.75 gal	15	0.583 gal/day	8.75 gal	8	1.09 gal/day
Dec 2020	7.0 gal	12	0.583 gal/day	7.5 gal	7	1.07 gal/day
Jan 2021	7.25 gal	14	0.52 gal/day	7.25 gal	7	1.035 gal/day
Feb 2021	3.75 gal	7	0.54 gal/day	3.75 gal	4	0.93 gal/day
Mar 2021	8.0 gal	12	0.67 gal/day	7.5 gal	8	0.937 gal/day
Apr 2021	6.75 gal	12	0.56 gal/day	7.25 gal	7	1.03 gal/day
May 2021	9.25 gal	15	0.62 gal/day	9.75 gal	9	1.08 gal/day
Jun 2021	8.0 gal	12	0.67 gal/day	7.5 gal	8	0.93 gal/day

** average flow may need further adjustment depending on the volume of wastewater pumped at the start of the first workday of the month, discharging wastewater generated during the prior month.

- d. Maximum daily flow calculations: As described in Finding #4a, required calculations should be based on the number of discharges from the sump to the sanitary sewer. Additionally, Finding

#4b explained wastewater volumes discharged to the sanitary sewer in a calendar month should be included in required calculations, such as the total volume discharged and the average discharge. These values should also be used to identify the maximum daily discharge. The EPA identified the following maximum daily discharges that did not appear to be based on the discharges from the sump to the sanitary sewer in the calendar month.

- i. For example, the log provided to the EPA for Outfall 001 in July 2020 indicated Eagle Bronze generated 0.5 gallons of wastewater on July 8, 2020; 0.25 gallons of wastewater on July 8, 2020; and 0.5 gallons of wastewater on July 13, 2020 before pumping the sump to discharge to the sanitary sewer. Therefore, the total volume that flowed through Outfall 001 at the end of the day on July 13, 2020 or the beginning of the day on July 14, 2020 was 1.25 gallons.

Month	Maximum daily discharge, reported	Maximum daily discharge, corrected
Jul 2020	0.75 gal	1.25 gal
Sept 2020	1.0 gal	1.25 gal
Oct 2020	0.75 gal	1.5 gal
Jan 2021	1.0 gal	1.5 gal
Feb 2021	1.0 gal	1.25 gal
Mar 2021	1.0 gal	1.5 gal
Apr 2021	0.75 gal	1.25 gal
May 2021	1.25 gal	1.5 gal

Pretreatment Requirement:

Part I.B of the Notification of Discharge Requirements defines the facility's outfalls.

Outfall Number	Description of Discharge Point
001	Discharge of the sump located in the main building. The contents of the sump are discharged with a manual sump pump to the sanitary sewer.
002	Discharge of the sump located in the monument building. The contents of the sump overflow to the sanitary sewer.

Part II.A.1 of the Notification of Discharge Requirements states, "Eagle Bronze is required to monitor for flow of the process discharges from Outfalls 001 and 002 for every operating day and document the discharge quantity in gallons each day of discharge. These NSCIU Requirements allow the facility to discharge less than or equal to 100 gallons per day of regulated wastewater for any production day from Outfalls 001 and 002. An exceedance of 100 gallons per day of regulated wastewater would result in Eagle Bronze no longer being classified as an NSCIU."

Part III.A.3 of the Notification of Discharge Requirements states, "Flow Data. The Annual NSCIU Compliance Report shall include flow data based on flow monitoring required in Part II.A.1 of these NSCIU Requirements. Submit a record on the discharge monitoring report (DMR) of the measured average daily flow for each month (monthly average) and the maximum daily flow for each month (daily maximum) from Outfalls 001 and 002 in the reporting period. If no discharge occurs during a month, it shall be stated as such on the DMR."

Part III.D states, “The Annual NSCIU Compliance Report shall include the following certification statement as set forth in 40 CFR § 403.12(q): “Based on my inquiry of the person or persons directly responsible for managing compliance with the categorical Pretreatment Standards under 40 CFR Part 433, I certify that, to the best of my knowledge and belief that during the period from January 1, [Calendar Year], to December 31 [Calendar Year]:

(a) The facility described as Eagle Bronze met the definition of a non-significant categorical Industrial User as described in §403.3(v)(2);

(b) the facility complied with all applicable Pretreatment Standards and requirements during this reporting period; and

(c) the facility never discharged more than 100 gallons of total categorical wastewater on any given day during this reporting period. This compliance certification is based upon the following information:

[Complete or attached required applicable documentation, including process discharge records].”

Corrective Action:

Ensure accurate data is reported to the EPA. Revise previously submitted DMRs to reflect accurate flow data. In response to the EPA, indicate how the facility will address this finding.

Finding #5: Plaster material and totes of waste wax were stored outside.

The EPA observed plaster material from the cooling metal molds and totes of waste wax outside the manufacturing buildings (photos 132, 137, and 143). During the inspection, it was noted that waste plaster is typically cleaned up and put into a dumpster at the end of each workday. Due to the July 4th holiday, this procedure may not have been followed. Ensure waste material from the manufacturing process is properly disposed of and if material comingles with stormwater on the site and flows offsite, an industrial stormwater permit from Wyoming DEQ may need to be obtained.

Recommendation:

The EPA recommends the facility coordinate with Wyoming DEQ to determine whether an industrial stormwater permit is required. No response to the EPA is needed regarding this Finding.