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)*

Ms. Sheena Kinkeade, Sr. EHS Manager
PCC Structurals, Inc.
839 Poquonnock Road
Groton, Connecticut 06340
sheena.kinkeade@pccstructurals.com

Re: Clean Water Act Inspection on August 23, 2022

Dear Ms. Kinkeade:

On August 23, 2022, the U.S. Environmental Protection Agency ("EPA") conducted an announced inspection at PCC Structurals, Inc. locations at 24 Granite Street in Northfield, New Hampshire, and 35 Industrial Park in Franklin, New Hampshire.

The inspector reviewed and observed metal finishing, mold and casting operations and process wastewater collection and treatment systems, industrial material and activities potentially exposed to precipitation, and oil storage and transfer areas. The inspector also reviewed chemical storage areas for potential slug load discharge/s into the municipal wastewater treatment works and/or surface waters.

Attached is the inspection report and pictures taken during the inspection. EPA is requesting the company address issues and deficiencies presented in the report and comments in pictures that are noted in parenthesis. EPA is requesting you provide a written response within 30-days of receipt. The response should be emailed to the inspector, Joseph Canzano at canzano.joseph@epa.gov.

The inspector observed industrial materials and activities not under cover and/or not fully within a storm-resistant shelter and having potential to be exposed to rain. At the company's Northfield plant, the inspector observed spilled industrial waste/solids from wastewater treatment in a roll-off container comingling with stormwaters in an area that has potential to discharge to surface waters and waste metal in a roll-off container not covered. At the company's Franklin plant, the inspector observed waste roll-off containers not under cover and/or fully under cover and not sealed, and industrial equipment not in use not fully under cover and corroding.

Based on the conditions of the company's plants during the inspection, the plants would not qualify for a Conditional Exclusion for "no exposure" under 40 C.F.R. §122.26(g). You must immediately ensure that all industrial materials and activities are protected by a storm-resistant shelter to prevent exposure to rain, snow, snowmelt and/or runoff. Please provide photo documentation to Mr. Canzano if you believe you have taken steps to qualify for the Conditional Exclusion for "no exposure." If such site conditions cannot be achieved at each plant, you must begin the process of developing a Stormwater Pollution Prevention Plan ("SWPPP") and submit a

Notice of Intent ("NOI") for coverage under EPA's NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity ("MSGP").

The Oil Pollution Prevention Regulations (40 C.F.R Part 112) may also be applicable to your plants. The inspector was informed by facility personnel that neither plant has an oil Spill Prevention Control and Countermeasure ("SPCC") plan but that one may need to be developed. The inspector recommends the company consult a professional engineer to evaluate each plant's applicability under the regulations.

Process wastewaters from the company's Northfield plant from metal mold and casting operations may be above federal standards for oil and grease and total copper. The company is mathematically averaging, on a quarterly basis, flow and production rate data when calculating equivalent concentration-based limits. This method is not consistent with EPA guidance[1]. EPA guidance shows variability analysis yields a determination of the achievable maximum daily, or maximum monthly average, concentration, or mass per day. This is then combined with the "long-term" average production and flow rates to yield a production-based standard. The Northfield plant's wastewaters may be in violation of categorical pretreatment standards at 40 C.F.R. § 464.15(f).

Upon your receipt of this letter (via email), EPA is requesting you provide an electronic reply to Mr. Canzano acknowledging receipt of this letter and the inspection report. If you have any questions about this letter or the inspection report, please email Mr. Canzano or you can reach him by telephone at (617) 918-1763.

Sincerely,

DENNY DART Digitally signed by DENNY DART Date: 2022.10.12 10:34:27 -04'00'

Denny Dart, Branch Manager
Enforcement & Compliance Assurance Branch

Enclosures: (electronic)
Images and Pictures

[1] Guidance Manual for the Use of Production-Based Pretreatment Standards and Combined Wastestream Formula, September 1985, and Metal Molding and Casting Development Document, October 1985.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
Enforcement & Compliance Assurance Division
5 Post Office Square, Suite 100
Boston, MA 02109-3912

Subj: Inspection Report - Clean Water Act

Inspector: Joseph Canzano, Clean Water Act Inspector
Enforcement & Compliance Assurance Division (ECAD-EWC)
Water Compliance Section (WCS)

JOSEPH CANZANO
Digitally signed by JOSEPH CANZANO
Date: 2022.10.04 15:00:59 -04'00'

I. Facility Information

A. Facility Name: PCC Structurals, Inc.

B. Facility Location/s: 24 Granite Street
Northfield/Tilton, NH 03276-1632
43° 26' 30.58" N
71° 35' 09.79" W

35 Industrial Park Drive
Franklin, NH 03235
43° 25' 21.42" N
71° 39' 31.03" W

C. Facility Contact/s: Sheena Kinkeade, Sr. EHS Manager
sheena.kinkeade@pccstructurals.com
(918) 346 3820

D. ID No(s): ICIS-NPDES[1] Northfield (NH0001023)
ICIS-NPDES NOE[2] Northfield (NHNOEJ02P)
National Oil Data Base Northfield (R1-NH-00295)
Facility Registry Service ID Northfield (110007681641)

ICIS-NPDES NOE Franklin (NHNOEJ02Q)
National Oil Data Base Northfield (R1-NH-000294)
Facility Registry Service ID Northfield (110070692303)

[1] National Pollutant Discharge Elimination System ("NPDES")

[2] No Exposure Exclusion ("NOE")

II. Background Information

E. Date(s) of inspection: August 23, 2022

F. Weather Conditions: Sunny, 82-degree Fahrenheit
Previous 30-Day Rainstorm Events[3]:
July 28th - .35" and July 25th - .48"
Aug 4th - .61" and Aug 6th - .61"
Aug 8th - 1.15" and Aug 22nd - .31"

G. US EPA Inspector(s): Joseph Canzano

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 433, Metal Finishing Regulations
- 40 C.F.R. Part 464, Metal Mold & Casting Regulations
- 40 C.F.R. Part 403, General Pretreatment Regulations
- 40 C.F.R. Part 122, NPDES Industrial Stormwater Regulations

III. Type and Purpose of Inspection

The purpose of the site inspection is to view Facility metal finishing, mold and casting categorical unit operations and process wastewater collection and treatment systems, industrial material and activities potentially exposed to precipitation, and oil storage and transfer areas. EPA's inspector also reviewed chemical storage areas for potential slug load discharge/s into the municipal wastewater treatment works and/or surface waters.

IV. Disclaimer:

Unless otherwise noted, this report describes conditions at the Facility/property as observed by EPA inspector/s, and/or through records provided to and/or information reported to EPA by Facility and as understood by EPA. This report may not capture all operations and activities ongoing at the Facility and at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action/s.

V. Facility File Review

Northfield/Tilton Facility

[3] https://www.wunderground.com/dashboard/pws/KNHFRANK19/table/2022-07-1/2022-07-1/monthly. The inspector selected days when daily rainfall amount recorded greater than ½-inch.

According to Federal Emergency Management Agency ("FEMA") flood information[4] part of the Facility is identified in a Flood Hazard Zone. The Facility, based on its location, has reasonable potential to discharge pollutants including oils to surface waters directly and/or indirectly, and runoff and drainage flows may discharge to the Winnipesaukee River.

According to EPA's records, on April 11, 2022, the company submitted into EPA's electronic NPDES eReporting tool ("NeT") a No Exposure Certification ("NEC") form[5], i.e., Exclusion from EPA's Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity ("MSGP"). The form was approved, and the certification (NHNOEJ02P) is scheduled to expire April 11, 2027. The company reported, for the plant, a primary standard industrial classification ("SIC") code of 3365, Aluminum Foundries, and certified industrial materials/activities are not exposed to precipitation, now or in the foreseeable future.

On October 26, 2018, the EPA issued the plant an individual permit[6] to discharge non-contact cooling waters to the Winnipesaukee River. The permit requires, among other things, monthly monitoring and reporting for non-contact cooling waters, annual monitoring and reporting for whole effluent toxicity, and a report describing operation/s using river water for non-contacting cooling and documentation for removing built-up sediment and debris from intake pipes.

According to certain discharge monitoring reports ("DMR") submitted by the company electronically into EPA's NetDMR system, the following monthly reports for non-contact cooling water discharges were submitted late/after the respective due date/s, i.e., October 2018, November 2018, July 2019, October 2019, November 2019, February 2020, and July 2021. Additionally, whole effluent toxicity reports due April 2019 and October 2021 were received late/after the due date/s. The April 2019 whole effluent toxicity monitoring report was due May 15, 2019 and the company submitted it into NetDMR system on November 13, 2019, and the October 2021 whole effluent toxicity discharge report was due November 15, 2021 and the company submitted it into NetDMR system on February 23, 2022. Additionally, the company submitted toxicity results for 2nd quarter 2020 into NetDMR system on May 15, 2020, but the submission and subsequent submissions did not include analytical laboratory results/report.

Within six months of the effective date of the permit, or no later than April 2019, the company should have submitted a report describing operation/s using river water for non-contacting cooling and documentation for removing built-up sediment and debris from intake pipes. In November 2019, six months after the due date, the company submitted the report, and also reported the intake piping was cleaned in February 2019.

The permit requires the company's effluent/discharge to the Winnipesaukee River for hydrogen ion concentration ("pH") be between 6.5 - 8.0 Standard Units ("S.U."). On two occasions, February 2020 and July 2021, the company reported pH results for the discharge below 6.5 S.U., i.e., February 13, 2020, 6.45 S.U., and on July 30, 2021, 6.41 S.U. and 6.45 S.U. Further, the discharge permit limit for maximum temperature to the river is to be no greater than 90 degrees Fahrenheit. On two occasions the company reported a discharge temperature greater than 90

[4] https://msc.fema.gov/portal/home

[5] Form 3510-11.

[6] NH0001023.

degrees Fahrenheit, i.e., July 2020, 93.6 degrees Fahrenheit, and August 2020, 92.7 degrees Fahrenheit.

Following the inspection, the EPA requested the company provide certain intake monitoring log/s for non-contact cooling waters drawn from the river. The Facility log from April 5, 2022 records an impingement event but the log doesn't include all required information set forth in the permit under Part C.4(c)(3), i.e., total length of each fish. Also, for each inspection performed the operator (ADP) is recording the inspection at the same time of day, i.e., 1159.

According to EPA records, process wastewaters generated from industrial manufacturing operations are introduced into the municipal sanitary sewer system which is managed by the Winnipesaukee River Basin Program ("WRBP"). Industrial wastewaters introduced into the system are subject to, among other things, federal pretreatment regulations which include general and specific prohibitions found at 40 C.F.R. §403.5 and categorical effluent standards for metal molding and casting operations, specifically at 40 C.F.R. §464.15(f).

The EPA reviewed discharge monitoring reports for wastewaters introduced into WRBP's municipal sanitary sewer system from categorical metal mold and casting operations following treatment. On a monthly basis the company collects and analyzes wastewaters for, total copper, total lead, total zinc, and oils and grease, and records daily categorical wastewater flows. Using this information, the EPA calculated from quarterly discharge monitoring reports an average daily production and discharge rates, and equivalent concentration-based limits for categorical standards[7]. From 3rd quarter 2019 through 2nd quarter 2022 EPA calculated an average daily production and discharge rates of 1,740-pounds of metal poured and 12,469-gallons respectively. Table below shows EPA calculated equivalent concentration-based limits ("ECLs")[8] for daily maximum ("DLMX") and monthly average ("MNAV") standards in 40 C.F.R. §464.15(f).

	DLMX (lbs/Mlbs)	MNAV (lbs/Mlbs)	ECL/DLMX (mg/l)	ELC/MNAV (mg/l)
Copper	8.48	4.63	0.142	0.077
Lead	8.7	4.3	0.145	0.072
Zinc	12.6	4.74	0.211	0.079
O/G	330	110	5.518	1.839

From September 2019 through April 2022, Facility wastewaters for certain pollutants of concern are reported above EPA calculated ECLs. Table below shows a summary of sampling data reported. Results highlighted in yellow are above daily maximum ECLs. Additionally, for certain months, some results, not highlighted, are also reported above the monthly average ECLs.

[7] Guidance Manual for the Use of Production-Based Pretreatment Standards and Combined Wastestream Formula, September 1985, and Metal Molding and Casting Development Document, October 1985.

Results (mg/l)				
	Copper (mg/l)	Lead (mg/l)	Zinc (mg/l)	O/G (mg/l)
DLMX	0.142	0.145	0.211	5.518
MNAV	0.077	0.072	0.079	1.839
Date of Samples Collected				
4/8/2022	0.37	0.0091	0.0141	7.7
1/5/2022	0.02	0.0021	0.022	<5
10/7/2021	0.16	0.01	0.053	<5
8/4/2021	0.11	0.0068	0.065	7.7
4/9/2021	0.19	0.015	0.078	8.4
1/6/2021	0.1	0.0051	0.047	<5
10/1/2020	0.21	0.044	0.15	<5
7/10/2020	0.037	0.0013	0.02	<5
4/22/2020	0.62	0.015	0.069	<5
1/23/2020	0.18	0.027	0.096	11
10/18/2019	0.26	0.018	0.14	<5
9/28/2019	0.08	0.011	0.072	<5

The company is mathematically averaging, on a quarterly basis, flow and production rate data when calculating ECLs and reporting WRBP. The company's method for calculating ECLs is not consistent with EPA guidance. EPA guidance shows variability analysis yields a determination of the achievable maximum daily, or maximum monthly average, concentration, or mass per day. This is then combined with the "long-term" average production and flow rates to yield a production-based standard.

Additionally, the number of production days the company is using for the calculation may not be representative. For example, the July 19, 2022 report uses 91-days as a production variable whereas company documentation indicates 37-days of production occurred over the quarter.

As noted above, company reports do not include monthly average ECLs, and reports do not address compliance with monthly average standards. Further, analytical laboratory detection levels for oil and grease is not at a test level below monthly average ECL. EPA calculated ECL for oil and grease is 1.83 mg/l and the laboratory oil and grease (HEM) blank value is <5 mg/l.

Franklin Facility

According to EPA's records, on April 11, 2022, the company submitted into EPA's electronic tool a NEC form, i.e., Exclusion from EPA's MSGP. The form was approved by EPA, and the certification (NHNOEJ02Q) is scheduled to expire April 11, 2027. The company reported, for the plant, a primary standard industrial classification ("SIC") code of 3441, Fabricated Metal Products, and certified industrial materials/activities are not exposed to precipitation, now or in the foreseeable future.

According to EPA records, process wastewaters generated from industrial manufacturing operations are introduced into WRBP's municipal sanitary sewer system. Industrial wastewaters introduced into the system are subject to, among other things, federal pretreatment regulations

which include general and specific prohibitions found at 40 C.F.R. §403.5 and categorical effluent standards for metal finishing operations, specifically at 40 C.F.R. §433.15.

The EPA reviewed discharge monitoring reports for wastewaters introduced into WRBP's sewer system from metal finishing operations following treatment. On a monthly basis the plant collects and analyzes wastewaters for, among other things, oils, and grease. From July 2019 through July 2022, plant wastewaters for oils and grease are reported at or above the industrial discharge local limit standard of 50 mg/l. Table below shows a summary of reported results above the limit.

Results (mg/l)	
Local Limit	O/G (mg/l)
DLMX	50 mg/l
Date of Samples Collected	
7/25/2019	220
11/8/2019	300
12/6/2019	190
5/14/2020	220
6/7/2020	62
7/10/2020	62
6/7/2020	50
9/3/2020	84
11/6/2020	77
4/13/2021	67
7/9/2021	51
10/8/2021	92
12/9/2021	55
1/6/2022	58
3/4/2022	73
4/15/2022	53

VI. In-Briefing

On August 9, 2022, EPA inspector, Joseph Canzano, contacted the Facility representative (Ms. Sheena Kinkeade, Sr. EHS Manager) and announced EPA would be conducting a site inspection on August 23, 2022. Ms. Kinkeade agreed to the date.

The inspector arrives at the site at ~9:00 a.m. (at the Franklin plant) and greeted by Ms. Kinkeade and Jim Eldridge, Plant Manager for both Franklin and Northfield/Tilton plants. The inspector presents credentials and request permission to conduct site inspections. Facility personnel allow access. The inspector reviews health and safety protocol, logistics for conducting the inspection and the purpose of the inspection. The inspector informs personnel the site inspection will include, but is not limited to, a review of industrial material and activities/operations, material storage/stockpile areas, oil and/or liquid chemical storage and transfer operations, warehouse building and runoff discharge points/outfalls, and process and treatment system wastewaters introduced into the sanitary sewer system.

Facility personnel explain Franklin and Northfield/Tilton plants store and consume oil and maybe applicable under EPA's Oil Pollution Prevention Regulations and may require an oil spill

prevention plan. The inspector requests the company perform an evaluation for applicability and determine if a spill plan is required, and if required, develop plan/s. The inspector recommends contacting a registered professional engineer.

Facility personnel indicate the company doesn't document site inspections regarding materials and activities exposed to stormwater. The inspector recommends the company periodically, once per year, document site conditions and changes at each plant for maintaining NECs. The company should use a site-specific checklist and refer to EPA's Guidance Manual for Conditional Exclusion from Storm Water Permitting Based On "No Exposure" of Industrial Activities to Storm Water, June 2000.

Process wastewaters from each plant's categorical operations are introduced into the municipal sanitary sewer system after treatment and is permitted by WRBP. Process wastewaters from the Franklin plant are subject to categorical metal finishing standards while process wastewaters from the Northfield/Tilton plant are subject to categorical metal molding and casting regulations. The Franklin plant performs, among other things, tumbling, water quenching and chemical etching operations while the Northfield/Tilton plant performs, among other things, aluminium investment casting operations which include acid mold washing. Dust collection and certain quench wastewaters from Franklin plant operations are collected in 275-gallon totes and transported off-site for disposal.

The Franklin plant has two connections into the sanitary sewer system. According to Facility representatives only one discharge is limited by metal finishing standards, i.e., discharge from T95 treatment storage tank. Wastewaters are treated prior to discharge using lime addition. Sludge/solids generation from treatment is disposed off-site as a non-hazardous waste. Wastewaters are batch treated and discharged periodically into the sewer system by an operator manually activating a discharge pump. Facility personnel indicated chemical spills within the plant's process areas would flow into the treatment system and be captured to prevent a slug load discharge into the sewer system.

Process categorical wastewaters from the Northfield/Tilton plant are introduced into the sewer system through a single connection and are treated prior to discharge. Wastewaters are treated using chemical addition for metals precipitation and flocculation for solids settling and neutralized for pH. Sludge/solids generation from treatment is disposed off-site as a non-hazardous waste. Wastewaters continuously discharge from the treatment system into the sewer system while the plant is operating. Wastewaters treated include, among other things, waters from cast cleaning (water jet blasting) operation and citric acid mold wash waters.

Treatment for wastewaters is initiated from a collection tank. Wastewaters from operations flow into the tank. Waters is then pumped from the collection tank to a chemical addition flash tank followed by a mixing tank. Pumps in the collection tank is activated based on liquid level float switch/s. The float/s activate or deactivate an automatic pump which initiates flow into the treatment system. From the mixing tank treated water flows into a clarifier and then discharges to the sewer system. Facility personnel indicate any chemical spills within the plant's process areas would flow into the wastewater collection tank and be captured to prevent a slug load discharge from reaching the sewer system.

The company is headquartered in Portland, Oregon and has an office in Groton, Connecticut. The Franklin and Northfield/Tilton plants employee 200-300 people, 2-shifts per day, Monday through Friday. The company, according to its website, is a world leader in aluminum, and titanium investment casting for applications in jet aircraft engines, airframes, and other industrial markets.

The inspector informs Facility representatives photographs will be taken during the site walk. The inspection team agrees to inspect the Franklin plant in the morning and the Northfield/Tilton plant in the afternoon.

VII. Site Inspection

Franklin Plant

The plant is a single story building about 4,500-square feet in area. The Merrimack River is about ½-half mile to the east of the plant and an unnamed stream to the west of the property which flows into the Merrimack River. The plant is located upgradient from the surface waters and certain designated wetlands. The access roads, parking lot and loading dock areas are asphalt paved.

The inspector observes a company truck and storm drain in front of a loading dock and platform, electrical transformers in certain areas, and condensate from an air conditioner unit. Under Part 1.2.2.1 of EPA's MSGP, condensate from air conditioners is authorized as a non-stormwater discharge provided condensate is uncontaminated. Facility representatives indicate transformers are owned by electrical company, and materials being loaded or unloaded at the dock doesn't come in contact with rainwater because the dock is covered, and the outfall for the storm drain is located on the opposite side of the facility fence. The inspector indicates, in the event of an accident/spill, an operator would have a difficult time reaching the outfall pipe to stop a discharge and/or be able to quickly deploy spill equipment.

Wastewaters from heat treatment and quenching operations are not introduced into the sanitary sewer system. Facility representatives indicate wastewaters from the operations are collected, drummed, and stored outside in a containment area that is fenced and undercover. The inspector observes (6) 275-gallon intermediate bulk containers (totes) in the containment area. Containers observed sealed and not leaking. The inspector recommends periodically inspecting and documenting quality of drainage waters pumped or released from the containment area. Adjacent to the area is a second partially roofed storage area with, among other things, empty plastic totes, wood pallets, out-of-service machinery, and waste roll-off containers. While certain materials are undercover, there is a potential for exposure. The inspector observes staining on the pavement, equipment corrosion, a rubbish container with a broken lid, and a roll-off container not completely undercover. The roll-off waste container used for treatment system solids is not covered and the container liner appeared to be damaged. The inspector recommends the area be evaluated and modified to ensure rain is not able to come in contact with industrial materials and all waste containers are covered.

Facility categorical process wastewaters are generated from a parts cleaning and etching operations. Wastewaters from rinsing and cleaning tanks drain into a sump prior to the treatment process. Wastewaters are pretreated using lime for pH adjustment and for encouraging solids

settling and removal. Sludge is pumped to a plate and frame press filter. Solids from the filter press are non-hazardous and disposed of in a roll-off container. Treated wastewaters are manually discharged to the sewer system. An operator initiates an electrical switch which activates a discharge pump. The discharge from the system into the collection system is monitored and recorded for pH automatically on a wheel chart while flow is recorded manually. Monitoring for compliance is performed from an inline pipe sample port.

Northfield/Tilton Plant

The plant is, for the most part, a single story building about 94,000,000-square feet in area. The Winnipesaukee River is adjacent to the plant. The plant is located upgradient from the river and run-off from the property has potential to discharge to the river. The access roads, loading docks and parking areas are asphalt paved.

The inspector observes water on the floor in a garage area where the company is storing a 10-yard roll-off waste container. The container is used to store solids generated from the plant's wastewater treatment system plate and frame press. Facility personnel indicate the floor in the garage is uneven and water can enter the garage. Waste solids and water mixture is observed on the garage floor. The day before the inspection the area experiences rain. Due to the condition of the garage floor and door, and exterior pavement there is potential for spilled solids to exit the garage and/or for rainwater to enter the garage area, mix with spilled solids and become contaminated, and then flow out of the garage to an outfall. Facility personnel indicate the garage and surrounding area is under evaluation and the company is in the process of addressing the matter. The inspector notes if the issue is not resolved immediately the plant's NEC could be withdrawn by the EPA and the company would be required to file for coverage under the MSGP and develop and implement a stormwater pollution prevention plan.

Water is taken from the Winnipesaukee River from a pump house for use in the plant using two pumps. According to Facility personnel pump rate withdrawal is between 45 and 50-gallons per minute. River water is used in the plant to, among other things, cool equipment. Water permitted for discharge is not to come in contact (noncontact) with material/s prior to discharge. Discharge rate to the river from the plant's outfall is calculated by the company prior to reporting to EPA on discharge monitoring reports. The company should attach supporting information/calculations when submitting DMRs.

Wastewaters are generated from, among other sources, aluminum investment cast cleaning operations. Facility personnel indicate the operation may be the source of elevated oil and grease results in wastewaters discharged to the sewer. In the cleaning process wax/oils is removed from cleaning molds. An operator loads parts into a washer unit and using a handheld high pressure power washer/wand cleans material from molds. Wastewaters from the operation drain to a central floor sump where it is pumped, via liquid level switch floats, into the treatment system. The sump is about 3,000-gallons in size. From the sump water flows through a treatment system to remove metals and adjust for pH prior to discharge into the sewer. The flow rate through the treatment system is recorded at 45-gallons per minute, and pH is 6.9 Standard Units.

Wastewaters are pretreated using chemical addition for pH adjustment and for encouraging solids settling and removal. Solids wasted from a clarifer flow to a sludge holding/thickening tank and then pumped to a plate and frame press filter. Solids from the filter are non-hazardous

and placed in a roll-off container for disposal. Treated wastewaters from the clarifier flow to a polishing tank for final pH adjustment and then the sewer system. Flow is continuous.

The pH for the discharge from the system into the collection system is monitored and recorded continuously on a wheel chart while flow is recorded manually. Monitoring for compliance is performed from an inline pipe sample port.

VIII. Closing Conference

Following the site walk the inspector reviews certain issues and observations with Facility representatives and recommends the following:

- For both plants, the company should review the federal Conditional Exclusion for "no exposure" under 40 C.F.R. §122.26(g). At the time of the inspection, the inspector observes industrial materials and activities exposed to rain. The garage space used for sludge solids storage at the Northfield plant is not storm resistant. Spilled waste solids on the floor of the garage can drag out of the garage and coming into contact with rain thereby potentially contaminating runoff flowing to an outfall. The company should immediately resolve the matter. The plant's NEC could be withdrawn by the EPA and the company would be required to file for coverage under the MSGP and develop and implement a stormwater pollution prevention plan.

- For the Franklin plant, Facility personnel indicate the plant is not appliable under EPA's Oil Pollution Prevention regulations because there is no reasonable potential for discharge. The inspector recommends the company consult a professional engineer to reevaluate both plants for applicability under the Rule.

- Wastewaters from the Northfield/Tilton plant have been identified in non-compliance with federally regulated oil and grease limits by the WRPB. Effluent data provided by the company confirms treated wastewaters from metal mold and casting operations may be above federal categorical standards for oil and grease, and total copper. In the reviewing the information, the company's method for calculating ECLs by averaging quarterly production and discharge rate data is not consistent with EPA guidance. Further, regarding copper the inspector recommends that Facility evaluate incoming water supply and treatment for copper source/s, see 40 C.F.R. §403.15.

The inspector exited the Franklin facility at 11:30 a.m., and the Northfield/Tilton plant at 2:30 p.m. End of report.