UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2, ECAD-WCB
290 Broadway, 21st Floor, New York, NY 10007

Program: Pretreatment	**Inspection Type:** Compliance Evaluation Inspection
Permittee Name: Brunner International Inc.	**NPDES/ICIS No.:** NY00B930 (MSGP), EPA IU ICIS NO. NYP081240
Inspection Entry Date: September 18, 2024 **Inspection Entry Time:** 9:00 AM	**Inspection Exit Date:** September 18, 2024 **Inspection Exit Time:** 1:30 PM
Facility Information: Brunner International, Inc. 3959 Bates Road Medina, New York 14103	**Lat, Long:** 43.220921, -78.366475 **NAICS / SIC Code:** 3714 MSGP: Sector AB – Transportation Equipment, Industrial & Commercial Machinery
EPA Representative(s): Murray Lantner, P.E. Environmental Engineer, EPA Region 2, ECAD-WCB (212) 637 3976 Lantner.Murray@epa.gov Mikhail Mohammed, Physical Scientist, EPA Region 2, (212) 637 4265, Mohammed.Mikhail@epa.gov	
State Representative(s): N/A	
On-Site Facility Representative(s): Dustin Corallo, EHS Manager, Brunner International Inc., dcorallo@brunnerbrakes-intl.com	
Medina WWTP Representative(s): Steve Rodland, Chief Operator, Village of Medina Wastewater Treatment Plant, stevenrodland@frontier.com Jason Watts, Superintendent, Village of Medina Department of Public Works, jwatts@villagemedina.org	
Responsible Official: Brian Peyatt, Plant Manager, Brunner International Inc., (585) 798-6000, (716) 804-7441 bpeyatt@brunnerbrakes-intl.com	

Name and Signature of Inspector	**Agency/Office/Phone Number**	**Date**
Murray Lantner, P.E. Env. Eng. MURRAY LANTNER Digitally signed by MURRAY LANTNER Date: 2024.11.22 12:26:56 -05'00' Mikhail Mohammed, Physical Scientist Mohammed, Mikhail Digitally signed by Mohammed, Mikhail Date: 2024.11.22 12:05:24 -05'00'	ECAD-WCB (212) 637-3976 ECAD-WCB (212) 637-4265	
Name and Signature of Management QA Reviewer	**Agency/Office/Phone Number**	**Date**
LARRY GAUGLER Digitally signed by LARRY GAUGLER Date: 2024.11.22 13:53:42 -05'00' Larry Gaugler, Team Leader, SCWCPT	ECAD-WCB (212) 637-3950	

I. INTRODUCTION

On September 18, 2024, Representatives of the United States Environmental Protection Agency ("EPA") Region 2, and representatives from the Village of Medina Wastewater Treatment Plant ("WWTP"), conducted a Compliance Evaluation Inspection ("CEI" or "Inspection") at Brunner International Inc. ("Facility") to determine compliance with the industrial user requirements in 40 CFR 403 and 433.17 (Metal Finishing - Pretreatment) and Section 307 of the Clean Water Act for its wastewater discharges to the Village of Medina Wastewater Treatment Plant ("WWTP"). The Village of Medina's WWTP discharges to the Oak Orchard Creek under State Pollutant Discharge Elimination System ("SPDES") Permit No. (NY0021873). Oak Orchard Creek is a tributary of Lake Ontario, which are all Navigable Waters under the Clean Water Act. The CEI also evaluated compliance with the Facility's New York State Department of Environmental Conservation ("NYSDEC") Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity, GP-0-23-001 ("MSGP") The Facility conducts industrial activity under Sector AB (Transportation Equipment, Industrial & Commercial Machinery) of the MSGP and maintains coverage under NYSDEC ("SPDES") Permit Tracking No. NYR00B930.

The Facility is a manufacturing plant, engaged in the production of braking systems for commercial truck and tractor trailers. The Facility's operations include metal forging, impact deformation, machining, stamping, heat treating, welding, e-coat immersion painting and system assembly. Brunner's process wastewater and non-process wastewater is directed to the sanitary sewer system of the Village of Medina's WWTP. Based upon the spring 2024 semi-annual report for the period December 2023 to May 2024 the Facility discharged a total of 1.209 MG with a daily average flow of 5,640 gpd and daily maximum flow of 13,840 gpd to the Medina POTW.

Upon entering the site, the EPA inspectors presented their credentials to the Facility representatives listed above. The EPA inspectors and Medina representatives conducted the opening conference explained the scope of the inspection. Following the opening conference, the EPA representatives along with the Village of Medina WWTP representatives, conducted an inspection of the Facility along with the EHS manager.

Note that there was a failure of the camera's memory card which deleted all of the photos taken during the inspection.

This report is based on information supplied by Facility representatives, direct observations made by the EPA inspectors, and other information including: photographs taken by EPA inspectors, physical evidence collected by the EPA inspectors, measurements taken by EPA inspectors, verbal or written statements made by information supplied by the Facility representatives during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA inspectors by the Facility representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to or after the inspection from a review of EPA, State, and/or public records may be included in this report.

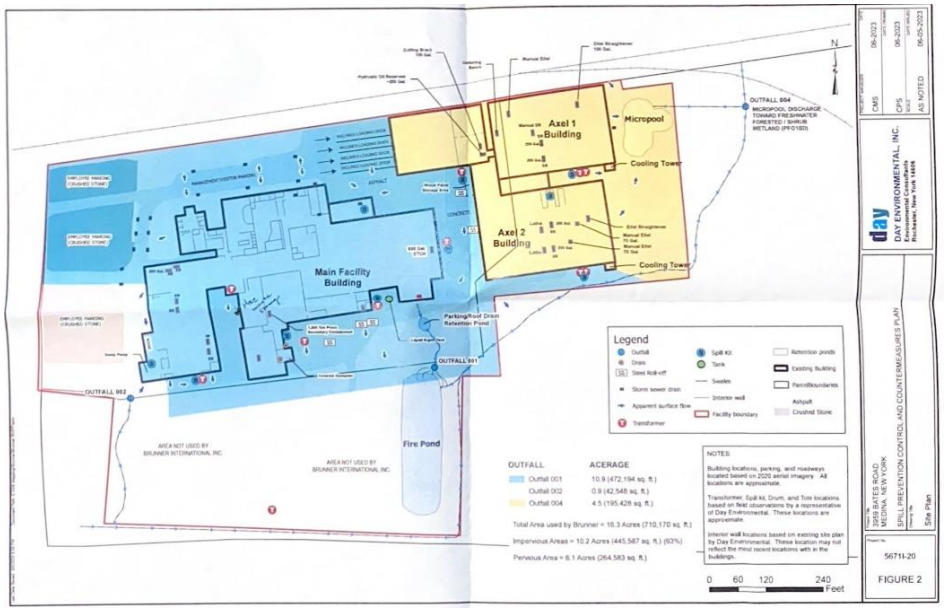
II. FINDINGS & OBSERVATIONS

Site Description:

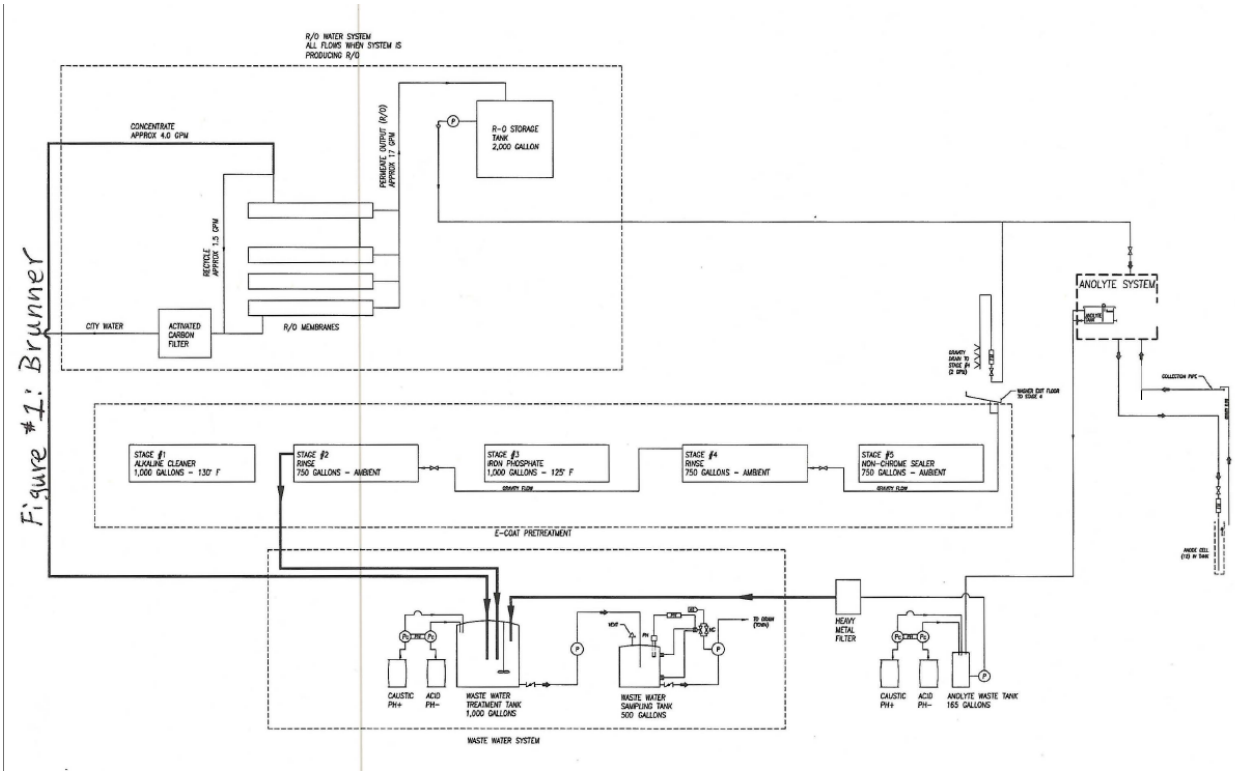
The Facility's Stormwater Pollution Prevention Plan ("SWPPP") indicated that the Site is approximately 32.6 acres of which 16.3 acres were said to contain industrial activities. The Facility conducts most of its processing in one main building and has other buildings for storage. Most of the manufacturing in the newer Axel buildings on the eastern portion of the site have ceased. Brunner uses Day Environmental as a third-party contractor for effluent monitoring, and contracts with Miller Environmental and Sun Environmental for hauling hazardous waste off-site.

The Site contains catch basins, swales and sewers that ultimately discharge to outfalls, 001, 002 and 004. Based on the Site Map and inspection, water from the Outfall 001 drainage flows through a pond where oil is skimmed, then it flows into the fire pond. The Site Map does not show it, but there also could be flow going west from the area marked Outfall 001 in the direction of 002 or vice-verse. The Site map shows that Outfalls 001 and 002, ultimately flow into Outfall 004 (which is currently unmonitored) which discharges into wetland PFO1BD. The Facility's SWPPP states that stormwater discharges from the Facility's Outfalls 001, 002, and 004 flow from the wetland to the North/Northwest into the Erie Canal a Navigable water and water of the U.S.

(Image displaying aerial view from Google Earth)



(Image displaying copy of site map from the SWPPP)



(Image displaying copy of site process flow diagram)

The Facility's operations include metal forging, impact deformation, machining, stamping, heat treating, welding, e-coat immersion painting and system assembly.

The Facility operations has a ten-stage process for its metal finishing process. Stage one: caustic cleaner, stage two: city water rinse, stage three: zirconium pre-treatment, stage's four, five and six: reverse osmosis water rinse, stage seven: e-coat paint bath, stage eight, nine and ten: premature post-rinse. Following this process theca parts after placed into a cure oven. The Facility said that it has phased out the use of phosphoric acid.

Wastewater (associated with part rinses) is treated through pH adjustment in a mixed tank where acid or caustic is added. When pH is within the set range of 6 to 9 it is pumped to the 500 gallon final discharge tank. A tap off the bottom is used for grab samples. The process wastewater flow to the Village of Medina is based on discharge pump cycles with a known volume for each pump cycle.

Brunner has been issued a sewer use permit by the Village of Medina WWTP to authorize the discharge of its process wastewater to the Village's sewer system. The Village's Sewer Use Permit does not include the metal finishing categorical standards in 40 CFR §433.17, but does include local limits for BOD, TSS, COD, Chlorine Demand, Phosphorus, Fats Oil and Grease, Total Nitrogen and pH. Brunner also submits semi-annual reports to EPA consistent with the metal finishing requirements in 40 CFR §433.17.

A. Potential Non-Compliance

MSGP

1. Part II.A.2 of the Permit requires Good Housekeeping and that the permittee keep clean all exposed areas that are potential sources of pollutants. Good housekeeping measures must be performed in order to minimize pollutant discharges. At the time of the CEI, EPA observed the following areas that were not operated or maintained in accordance with the Multi Sector General Permit:
    a. At the time of the inspection, EPA noted several uncovered metal bins stored near the souther perimeter of the site, some contained oily wastewater, some contained standing water.
    b. At the time of the inspection, EPA observed material on the ground from the Facility's shot blast dust collector. EPA observed track out of this material around the collection area. The dust collector area must be covered and dust collector bins should be sealed to avoid loss of dust and stormwater contamination. Part II.A.11 of the MSGP requires that the minimization of dust generation be minimized.
    c. There was oily sediment and used speedy-dry outside of a dumpster near the Axel building that needed to be cleaned up.
    d. At the time of the inspection, EPA observed several catch basins throughout the site with ripped or torn filter fabric, and/or were inundated with sediment and in need of maintenance. There was soil and material around dumpsters and near catch basins on the north side of the facility.

The Facility's SWPPP per Part III of the MSGP also specifies that routine inspection and maintenance will be conducted.

2. Part IV.E of the Permit requires quarterly visual monitoring. The SWPPP identifies that the there is an Outfall 004 at the Facility. Site representatives stated that they can not currently access outfall 004 to conduct visual monitoring. Outfall 004 had not been monitored in the second quarter 2024 and it was likely that it was not going to be monitored in the 3rd quarter 2024. The Facility must identify an accessible location and monitor Outfall 004 in accordance with Part IV of the MSGP. Please send EPA a narrative description for a new sampling plan for outfall 004.

3. Part III.A.6 of the Multi Sector General Permit requires the listed site requirements for a site map including location of potential pollutant sources, location of outfalls, and processing and storage areas. At the time of the inspection, EPA noticed the following deficiencies:
   a. At the time of the inspection, EPA noted that the location of sampling for outfall 001 was not sufficient for obtaining representative samples, nor was it at the point designated on the Site Map. The Facility said that it would move the Outfall 001 sampling point to the retention pond to obtain a representative sample.
   b. At the time of the inspection, EPA observed a stockpile of concrete aggregates stored in the southern portion of the facility which were not identified on the site map during the CEI.
   c. The bin storage described in A.1 above in the southern portion of the facility was not shown on the site map.
   d. The shot blast dust collector – which led to dust exposed to stormwater, is not identified on the Site Map.

Industrial User

1. 40 CFR 403.3 (k) specifies, *"[t]he term Interference means a Discharge which, alone or in conjunction with a discharge or discharges from other sources, both:*

   (1) Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and

   (2) Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act."

2. 40 CFR 403.3(p) specifies that, *"the term Pass Through means a Discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone*

or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation).”

3. 40 CFR Part 403.5 (a) specifies that a user may not introduce into a POTW any pollutant(s) which cause Pass Through or Interference.

4. 40 CFR Part 403.5(b) (4) prohibits an Industrial User “from discharging any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a Discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW.”

5. The Facility in the past used phosphoric acid and was said to be a source of phosphorus exceedances at the Medina WWTP. Brunner has since phased out the use of phosphoric acid in its process, and the Medina WWTP Operators said that Brunner no longer causes phosphorus exceedances at the Medina WWTP. The table below shows Medina WWTP Permit Exceedances for the period January 2021 to July 2024 with a clear reduction in phosphorus exceedances. 40 CFR 403.5 prohibits causing or contributing to pass through and interference at the POTW.

Table 1 - Medina WWTP Permit Exceedances for the Period January 2021 to July 2024.

Monitoring Period Date	Outfall	Parameter Description	Type	Limit Value	DMR Value
January-21	001-M	Phosphorus, total (as P)	MO AVG	1	2.05
January-21	001-M	BOD, 5-day, percent removal	MO AV MN	85	84
February-21	001-M	Phosphorus, total (as P)	MO AVG	1	1.07
March-21	001-M	Solids, suspended percent removal	MO AV MN	85	84
May-21	001-M	Phosphorus, total (as P)	MO AVG	1	1.03
June-21	001-M	Phosphorus, total (as P)	MO AVG	1	1.29
July-21	001-M	Phosphorus, total (as P)	MO AVG	1	1.6
August-21	001-M	Phosphorus, total (as P)	MO AVG	1	1.51
September-21	001-M	Phosphorus, total (as P)	MO AVG	1	1.16
November-21	001-M	Phosphorus, total (as P)	MO AVG	1	1.12
January-22	001-M	Solids, suspended percent removal	MO AV MN	85	84
February-22	001-M	BOD, 5-day, percent removal	MO AV MN	85	77
February-22	001-M	Solids, suspended percent removal	MO AV MN	85	84
March-22	001-M	BOD, 5-day, percent removal	MO AV MN	85	84

Monitoring Period Date	Outfall	Parameter Description	Type	Limit Value	DMR Value
March-22	001-M	Solids, suspended percent removal	MO AV MN	85	77
April-22	001-M	Solids, suspended percent removal	MO AV MN	85	83
June-22	001-M	Solids, suspended percent removal	MO AV MN	85	83
September-22	001-M	Phosphorus, total (as P)	MO AVG	1	3.2
October-22	001-M	Phosphorus, total (as P)	MO AVG	1	1.69
November-22	001-M	Nitrogen, ammonia total (as N)	MO AVG	5.7	6.7
December-22	001-M	BOD, 5-day, percent removal	MO AV MN	85	82
January-23	001-M	BOD, 5-day, percent removal	MO AV MN	85	78
January-23	001-M	Solids, suspended percent removal	MO AV MN	85	82
February-23	001-M	BOD, 5-day, percent removal	MO AV MN	85	83
February-23	001-M	Solids, suspended percent removal	MO AV MN	85	84
March-23	001-M	BOD, 5-day, percent removal	MO AV MN	85	58
March-23	001-M	Solids, suspended percent removal	MO AV MN	85	69
April-23	001-M	BOD, 5-day, percent removal	MO AV MN	85	76
April-23	001-M	Solids, suspended percent removal	MO AV MN	85	73
May-23	001-M	Phosphorus, total (as P)	MO AVG	1	1.02
June-23	001-M	Phosphorus, total (as P)	MO AVG	1	1.66
June-23	001-M	BOD, 5-day, percent removal	MO AV MN	85	75
June-23	001-M	Solids, suspended percent removal	MO AV MN	85	84
July-23	001-M	Phosphorus, total (as P)	MO AVG	1	1.4
July-23	001-M	Solids, suspended percent removal	MO AV MN	85	73
August-23	001-M	Solids, suspended percent removal	MO AV MN	85	83
November-23	001-M	Nitrogen, ammonia total (as N)	MO AVG	5.7	8
December-23	001-M	BOD, 5-day, percent removal	MO AV MN	85	73
January-24	001-M	Nitrogen, ammonia total (as N)	MO AVG	5.7	6.1
January-24	001-M	BOD, 5-day, percent removal	MO AV MN	85	80

Monitoring Period Date	Outfall	Parameter Description	Type	Limit Value	DMR Value
January-24	001-M	Solids, suspended percent removal	MO AV MN	85	80
February-24	001-M	BOD, 5-day, percent removal	MO AV MN	85	83
March-24	001-M	BOD, 5-day, percent removal	MO AV MN	85	76
March-24	001-M	Solids, suspended percent removal	MO AV MN	85	84
April-24	001-M	BOD, 5-day, percent removal	MO AV MN	85	78
April-24	001-M	Solids, suspended percent removal	MO AV MN	85	84
June-24	001-M	Phosphorus, total (as P)	MO AVG	1	1.24
July-24	001-M	Solids, suspended percent removal	MO AV MN	85	78

B. Areas of Concern Stormwater:

1. At the time of the inspection, EPA observed an oil water seperator in main building. Facility representatives explained that the soil/groundwater below the facility may be contaminated from previous use, leading to discharges of oily stormwater. The Facility collects the oil from a pit below the building and runs it through the Oil/Water separator which then discharges to stormwater outfall 001. Part I.A.2 of the MSGP cites to 6 NYCRR 750-1.2(a)(29)(vi) for allowable non-stormwater discharges that are authorized to discharge under the MSGP. 6 NYCRR 750-1.2(a)(29)(vi) authorizes the discharge of uncontaminated groundwater; and foundation or footing drains where flows are not contaminated with process materials such as solvents under the MSGP. Outfall 002 also has a retention pond that was relined this year, where oil can be removed with sorbent pads. The Facility should discuss with the Village of Medina whether the Oil/Water Separator discharge can be routed into the Village's Sanitary Sewer or discuss with NYSDEC Region 9, whether an individual SPDES Permit is needed for this Oil/Water Separator Discharge.

2. On the north side of the Facility near the Fleet building there appeared to be a potential stormwater outfall that needs to be evaluated to determine if it is a stormwater outfall that needs to be included in the Notice of Intent and the SWPPP.

3. The Facility representatives said that a contractor's truck had a hydraulic oil leak and reported a spill to NYSDEC in February/March 2024. Part III.A.4.a of the MSGP specifies that spills must be identified in the SWPPP.

4. Part V.A of the MSGP states that when the quarterly visual monitoring indicates the presence of pollution or when the benchmark or numeric effluent limitation monitoring sample results indicate exceedances of the pollutants, the owner or operator must inspect the facility for potential sources of stormwater contamination. And implement additional non-structural

and/or structural BMPs to address any sources of contamination that are identified to prevent recurrence. Part III.11 of the MSGP requires that corrective action documentation be maintained. Review of the Quarterly Visual Monitoring records indicated that in the:

a. First Quarter 2024 - during a snow melt event there yellowish slightly cloudy sample at Outfall 002 attributed to moving water at 002 stirring up sediment.
b. Second Quarter 2024 - the discharge from Outfall 001 was cloudy and had sediment due to strong rains. Outfall 002 was also cloudy with floating vegetation and settled vegetation.

No corrective actions per Part III.11 and Part V.A of the MSGP were identified for the issues noted during the above quarterly visual monitoring.

C. Areas of Concern Industrial User

1. The Facility runs city water through a reverse osmosis ("R.O.") unit to obtain water for its processes. R.O. water is stored in a 1,500 gallon tank. R.O. reject water was said to be mixed with the process wastewater tributary to the Medina WWTP. The membranes were said to be flushed every 6 months and no acid/chemicals used to clean the membranes. Please provide the daily volume of R.O. reject water that is mixed with the process wastewater that flows through the industrial user monitoring point.

2. The process wastewater flow to the Village of Medina is based on discharge pump cycles with a known volume for each pump cycle. In the past the volume for each pump count or cycle was determined using a bucket. The Facility should verify/calibrate its flow measurements since pumping rates can change over time do to pump wear.

3. At the time of the inspection, facility representatives stated that all floor drains and manholes had been sealed. EPA observed one manhole/floor drain that was not completely sealed off in building 1.

4. At the time of the inspection, EPA observed leaking process wastewater onto the floor inside the main building near the pH neutralization tanks. The wastewater would be sent to the Village of Medina WWTP. However, the leak should be fixed to avoid puddling of water on the building's floor.

5. The Facility has cooling towers on-site. Please verify where each of the cooling towers discharge into.

D. Other Inspection Observations

1. At the time of the inspection, EPA was informed by facility representatives that the facility eliminated the use of the phosphating process and chromium coating. The Facility said that they were doing coating with titanium and its E-Coat process.
2. The Facility has a Spill Prevention Control and Countermeasures ("SPCC") Plan

Industrial User

3. Brunner submitted the following semi-annual reports to EPA as required by 40 CFR Part 403 and 433.17:
   a. The laboratory report for the semiannual samples collected for the period August 8 to 9, 2023, April 3, 2024 to April 4, 2024 indicated that the Facility's discharges were below the effluent limits contained 40 CFR §433.17. The reports also contained the certification statement in lieu of Total Toxic Organics ("TTO") monitoring as provided in 40 CFR § 433.12. Analytical methods, preservatives and holding times contained in the lab report were consistent with the requirements of 40 CFR 136.

   b. Brunner provided EPA with its Toxic Organic Management Plan/Solvent Management Plan ("TOMP") (per 40 CFR § 433.12) and the EPA approval letter for the TOMP dated March 5, 2018, which allows for in lieu of monitoring for TTO.

   c. Recent phosphorus (phosphates as P) concentration samples for the IU Discharge were below the local limits (20 mg/L) as shown in the table below.

Table – IU Outfall sample results for Phosphorus to the Village of Medina

Date of Sample	Phosphorus Concentration (mg/l) Local Limit 20 mg/l
February 7 to 8, 2024	2.75
July 9 to 10, 2024	0.32
August 6 to 7, 2024	0.34

   d. The wastewater system has pH meters and an audible alarm if pH is out of range.

Stormwater MSGP

4. Fourth Quarter 2023
   a. Quarterly Visual Monitoring Per Part IV.E of the MSGP was available for the 3rd Quarter 2023 and did not note any need for corrective action;
   b. Quarterly Routine Facility Inspection per Part IV.B of the MSGP was conducted in the 3rd Quarter 2023

5. First Quarter 2024
   a. Quarterly Visual Monitoring Per Part IV.E of the MSGP was available for the first quarter 2024 during a snow melt event and noted a yellowish slightly cloudy sample at Outfall 002 attributed to moving water at 002 stirring up sediment.
   b. Quarterly Routine Facility Inspection per Part IV.B of the MSGP was conducted in the first quarter of 2024.
6. Second Quarter 2024

a. Quarterly Visual Monitoring Per Part IV.E of the MSGP was available for the second quarter 2024 and noted that the discharge from Outfall 001 was cloudy and had sediment due to strong rains. Outfall 002 was also cloudy with floating vegetation and settled vegetation and no corrective actions were noted. No monitoring was conducted at Outfall 004, due to access issues.

b. Quarterly Routine Facility Inspection was conducted in the second quarter of 2024.

7. The 2023 Annual Certification Report required by Part VI.A.1 of the MSGP for 2023 was sent to EPA as requested.

8. The Facility reported that it conducts annual stormwater training per Part II.8 of the MSGP. They train about 20 people and had training records from 2023.

9. No sheens or foams were seen in the discharges at Outfalls 001 and 002 nor in the pond tributary to Outfall 004.

III. CLOSING

At the conclusion of the CEI, EPA, and the Village of Medina WWTP representatives held a closing conference with the Facility representatives and discussed many of the above items.