



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

Date: *Dated as shown on electronic signature(s)*

Subj: Inspection Report
Clean Water Act
BETE Fog Nozzle, Inc.

From: John (Jack) Melcher, Environmental Engineer

JOHN MELCHER

Digitally signed by JOHN

MELCHER

Date: 2022.12.14 16:10:32 -05'00'

Thru: Damian Bednarz, Life Scientist

DAMIAN BEDNARZ

Digitally signed by DAMIAN

BEDNARZ

Date: 2022.12.15 09:12:50 -05'00'

To: File

I. Facility Information

A. Facility Name: BETE Fog Nozzle, Inc.

B. Facility Location: 50 Greenfield Street
Greenfield, MA 01301

C. Facility Contacts: Matthew Boyden, VP Operations & Engineering
413-772-2166, mboyden@BETE.com

Jeffrey P. Bubeau, Environmental Compliance Associate
Tighe & Bond Consulting Engineers
413-572-3243, JBibeau@tighebond.com

D. NPDES ID No(s): 3601486884 (ICIS ID for pretreatment)
MAU000357 (stormwater)

II. Background Information

A. Date(s) of inspection: November 29, 2022

B. Weather Conditions: 41 °F, clear skies and sunny

C. US EPA Representative(s):
John (Jack) Melcher
Damian Bednarz

D. State/Local Representative(s):

None

E. Federally Enforceable Requirements Covered During the Inspection:

40 CFR 403 – General Pretreatment Regulations for Existing and New Sources of Pollution¹

40 CFR § 433.17 – Metal Finishing Point Source Category, Pretreatment Standards for New Sources²

40 CFR § 122.26 – National Pollutant Discharge Elimination System (“NPDES”) regulation for the discharge of stormwater

F. Previous Enforcement Actions:

No prior EPA Clean Water Act enforcement.

III. Type and Purpose of Inspection

EPA conducted an Industrial User (“IU”) Reconnaissance Inspection and to evaluate applicability of the Metal Finishing Point Source Category at 40 C.F.R. Part 433.

EPA conducted a Reconnaissance Inspection to evaluate compliance with the NPDES regulation for the discharge of stormwater at 40 C.F.R § 122.26.

IV. Facility Description

BETE Fog Nozzle (the “Facility”) is a manufacturer of nozzle and spray system components. The products are used in applications, including foam and dust suppression and fire protection. The facility is located at the end of Greenfield Street in an industrial park. The building where operations are conducted is about 1.2 acres. The site also features a non-permeable, asphalt parking lot of about another 1.2 acres.

V. Inspection

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 inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing 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.

¹ Available at: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-N/part-403?toc=1>

² Available at: <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-N/part-433?toc=1>

I announced the inspection to the Facility on November 22, 2022. Brian Henderson, maintenance manager at BETE, agreed to meet on the following Wednesday alongside their Environmental Compliance Associate, Jeffrey Bibeau.

Mr. Bednarz and I arrived at approximately 2:30 PM on November 29, 2022.

A. Opening Conference

I presented my credentials and explained the purpose of the inspection. I asked whether the Facility conducts metal finishing operations, including electroplating, electroless plating, anodizing, coating, chemical etching and milling, and printed circuit board manufacturing. Mr. Bibeau expressed that while their SIC code is 2499, none of these occur on site and that their manufacturing is a dry operation. Further, Mr. Bibeau explained that the only wet practice occurring was quality control, where the nozzles are tested for their spray patterns and efficacy. This water is recirculated in that system, and a small amount of nozzle test water is discharged to the town infrequently.

Mr. Bibeau stated that the Facility did not have any stormwater point source discharges since all stormwater was conveyed by sheet flow.

B. Facility Tour

I observed a loading dock with a trench drain. The facility representatives said that they did not know where the drain flowed to.

I observed a swale beside the parking lot.

Facility representatives said that no industrial activities occur outdoors.

C. Closing Conference

I said that the Facility did not appear to be subject to the Metal Finishing Point Source Category at 40 C.F.R. Part 433.

I recommended that the Facility consider preparing a no exposure certification under the Multi Sector General Permit (“MSGP”) for Stormwater Discharges Associated with Industrial Activity.³

Mr. Bednarz and I departed at approximately 3:00 PM.

³ Available at: <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-epas-2021-msgp>