



**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)*

James Bailey
Plant Health and Safety Manager
Burndy, LLC
34 Bern Dibner Drive
Lincoln, New Hampshire 03251
JBailey3@hubbell.com

Re: Clean Water Act Inspection on October 23, 2023, of Facility at 34 Bern Dibner Drive,
Lincoln, New Hampshire

Dear Mr. Bailey:

On October 23, 2023, the U.S. Environmental Protection Agency (“EPA”) conducted an announced inspection at Burndy, LLC located at 34 Bern Dibner Drive in Lincoln, New Hampshire (the “Facility”). The purpose of the inspection was to view Facility metal finishing operations, wastewater collection and treatment systems, industrial material and activities potentially exposed to precipitation, and oil storage and transfer areas. Inspector also reviewed chemical storage areas for potential slug load discharges 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 Facility is reporting to EPA stormwater sample results for indicator pollutants identified in EPA’s industrial stormwater Multi-Sector General Permit (“MSGP”) at certain outfalls, i.e., Stormwater Outfall 001 and Stormwater Outfall 006. Based on the inspector’s observations, runoff from those outfalls do not fully represent Facility industrial activities and operations exposed to rain. The inspector recommends the Facility change monitoring locations for indicator pollutants from Facility Stormwater Outfall 001 and Stormwater Outfall 006 to Facility Stormwater Outfall 002 and Stormwater Outfall 004. Within the drainage area for Stormwater Outfall 002 the inspector observed oil truck off-loading areas not under cover for an underground storage tank and emergency power generators. Additionally, storage containers used for solid and hazardous waste disposal are located in the drainage area for Stormwater Outfall 004. The Facility must amend its Stormwater Pollution Prevention Plan (“SWPPP”) to reflect any changes related to stormwater monitoring.

The Facility is submitting to EPA pretreatment periodic reports on continued compliance as required by the General Pretreatment Regulations at 40 C.F.R. Part 403. Facility reports and

process flow diagrams show compliance monitoring for the metal finishing total cyanide standard is occurring in an improper location. Under 40 C.F.R. § 433.12(c), self-monitoring for cyanide must be conducted after cyanide treatment and before dilution with other streams. Additionally, the process flow diagram should show the cyanide monitoring location, flow measurement equipment before and/or after cyanide destruct system, and identify waste stream sources as regulated, non-regulated or dilute.

The Oil Pollution Prevention Regulations at 40 C.F.R Part 112 remain applicable to the Facility. The Facility provided EPA with an oil Spill Prevention Control and Countermeasure ("SPCC") plan certified by a professional engineer, date November 10, 2023.

Following the inspection, on November 3, 2023, November 10, 2023, and November 15, 2023, the Facility submitted certain documents to EPA that demonstrate actions taken or will be taken because of the inspection. EPA is reviewing the documents. The Facility may want to revise the November 15, 2023 action punch list after reviewing the inspection report.

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,

TODD BORCI
Digitally signed by TODD
BORCI
Date: 2023.12.11 12:43:45
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Todd Borci, Supervisor
Water Technical Unit 1
Enforcement and Compliance Assurance Division

Enclosures: (electronic)
SPCC Field Inspection and Plan Review Checklist, and Pictures
Pretreatment Monitoring and Reporting Procedures
Facility Inspection Reports