



**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)*

Mr. Rich Knapp, Regulatory Compliance Officer
New England Wire Technologies Corporation
130 North Main Street
Lisbon, NH 03585
rich.knapp@newenglandwire.com

Re: Clean Water Act Inspection on September 22, 2021

Dear Mr. Knapp:

On September 22, 2021, the U.S. Environmental Protection Agency ("EPA") conducted an announced inspection at New England Wire Technologies Corporation's facility located at 130 and 145 North Main Street in Lisbon, New Hampshire ("the Facility").

EPA inspectors viewed Facility metal finishing and plastic molding & forming manufacturing operations, industrial wastewater sources subject to federal general and categorical pretreatment standards and wastewater sampling locations. Samples were also obtained by EPA of the discharge from the plastic molding & forming (contact cooling) process lines from the Riverside manufacturing building at 145 North Main Street. See Attachment for results. Inspectors also reviewed the Facility's stormwater pollution prevention plan (SWPPP) and oil spill prevention, control, and countermeasure (SPCC) plan interim report.

Attached is the inspection report with monitoring data collected by EPA and pictures taken during the inspection. EPA is requesting the Facility address issues and/or deficiencies presented in the report and comments in pictures in parenthesis. EPA is requesting you provide a written response within 45-days of receipt. The response should be emailed to Joseph Canzano at canzano.joseph@epa.gov.

- Currently, the Facility doesn't meet the federal definition of a Significant Industrial User (SIU) under 40 C.F.R. §403.3(v). The Facility's silver and tin electroplating processes are zero-discharge categorical unit operations. If the operation/s should change and begin introducing wastewaters into a Publicly Owned Treatment Works (POTW) then the Facility would become a Categorical Industrial User/Significant Industrial User. The EPA is requesting the Facility provide voluntarily to EPA a zero-discharge certification statement for electroplating wastewaters. The certification statement would be submitted at least annually to EPA and should be prepared in accordance with 40 C.F.R. §403.6(a)(2)(ii).
- While the Facility is not a SIU, the federal Pretreatment Regulations require all Industrial Users to promptly notify the Control Authority (EPA and POTW) ... in advance of any substantial change in the volume or character of pollutants in their discharge, 40 C.F.R. §403.12(j). This requirement applies to the Facility.
- Currently, there did not appear to be a significant potential for a chemical spill (Slug Discharge) to be introduced to the POTW while the Facility is operating during normal business hours or is occupied, 40 C.F.R. §403.12(f)(2)(vi). A Slug Discharge (40 C.F.R. §403.8(f)(2)(iv)) 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. Facility personnel should review EPA's *Control of Slug Loadings to POTW Manual*¹, particularly the information pertaining to employee training program for reporting and responding to an accidental chemical spill to the POTW.

- On September 22, 2020, the Facility submitted/filed a conditional exclusion for no exposure (NOE) under EPA's NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP), the regulations for which can be found at 40 C.F.R. §122.26(g). The NOE only identifies the Facility's 130 North Main Street/Trackside Plant. The Facility may have inadvertently forgot to include on the NOE under Facility Information the property located at 145 North Main Street/Riverside Plant. The Facility should review its operations at the location and determine if a NOE is needed at its Riverside Plant.

The current NOE (NHNOE3250) remains in effect and will expire on September 22, 2025, unless your facility becomes unable to maintain its eligibility for an exclusion sooner than that date. If changes at a facility result in industrial activities or materials becoming exposed, the no exposure exclusion ceases to apply. Currently, there did not appear to be industrial activities or materials exposed to precipitation or other source of pollutants to the environment. Even through the Facility maintains a no exposure exclusion status, Facility personnel should periodically review EPA's *Guidance Manual for Conditional Exclusion from Stormwater Permitting*². The Facility

- EPA inspectors observed several oil-filled containers, drums and equipment and were informed by Facility personnel that the Facility may have total oil storage capacity greater than 1,320-gallons. At the time of the inspection Facility personnel were unable to provide EPA inspectors with a Spill Prevention, Control, and Countermeasure (SPCC) plan. On October 14, 2021, the Facility provided EPA with an oil SPCC Plan Interim Report, dated November 11, 2016, and informed the EPA that the document was never finalized. On October 19, 2021, the Facility acknowledged receipt of an EPA document entitled Notice of SPCC Inspection with Deficiencies. Inspector Canzano informed Mr. Knapp by way of an October 21, 2021 email that the Facility's responsibility is to develop and implement a SPCC plan as soon as possible, and to respond to the Notice no later than November 19, 2021 regarding the Facility's progress for finalizing the SPCC plan.

The EPA is requesting you provide an electronic reply to this email acknowledging receipt of the report, and if you will be unable to respond to the report within 45 days due to COVID-19 impacts on your business, please email Mr. Canzano or you can reach him by telephone at (617) 918-1763.

Sincerely,

NEIL HANDLER
Digitally signed by NEIL
HANDLER
Date: 2021.11.12 14:02:57
-05'00'

Neil Handler, Senior Enforcement Coordinator
Enforcement & Compliance Assurance Division

Enclosures: (electronic)
Images and Pictures

¹ <https://www3.epa.gov/npdes/pubs/owm021.pdf>

² <https://www.epa.gov/npdes/guidance-manual-conditional-exclusion-stormwater-permitting-based-no-exposure-industrial>

cc: Alex Rastorguyeff, NH-DES, Alexis.Rastorguyeff@des.nh.gov
Jerry Keefe, EPA, keefe.jerry@epa.gov
Michelle Coombs, EPA, coombs.michelle@epa.gov
Joe Canzano, EPA, canzano.joseph@epa.gov



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, Inspector & Compliance Officer
Enforcement & Compliance Assurance Division (ECAD-EWC)
Water Compliance Section (WCS)

**JOSEPH
CANZANO**

Digitally signed by
JOSEPH CANZANO
Date: 2021.11.12
15:13:03 -05'00'

I. Facility Information

- A. Facility Name:* New England Wire Technologies Corporation (the "Facility")
<http://www.newenglandwire.com/>
- B. Facility Location:* 130 & 145 North Main Street
Lisbon, NH 03585
43° 13' 01" N
-71° 54' 21" W
- C. Facility Contact/s:* Mr. Rich Knapp, Regulatory Compliance Officer
rich.knapp@newenglandwire.com
603-838-7078
- D. ID No(s):* ICIS-NPDES (NHNOE3250)
National Oil Data Base (R1-NH-00291)
Facility Registry Service ID (110000313928)

II. Background Information

- E. Date(s) of inspection:* September 22, 2021
- F. Weather Conditions:* Overcast, 70-degree Fahrenheit
Previous Measurable Rain Event¹: Sept. 15th - .36"
- G. US EPA Inspector(s):* Joseph Canzano, Michelle Coombs

¹ <https://www.wunderground.com/dashboard/pws/KNHTINKE2/graph/2021-09-19/2021-09-19/monthly>

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 122, NPDES² Regulations
- 40 C.F.R. Part 403, General Pretreatment Regulations
- 40 C.F.R. Part 433.15, Metal Finishing Regulations
- 40 C.F.R. Part 463.15, Plastic Molding & Forming Manufacturing Regulations

III. Type and Purpose of Inspection

The purpose of the site inspection is to view the Facility's metal finishing and plastic molding and forming manufacturing operations, process wastewater collection and transfer systems, and sources subject to federal general and categorical pretreatment standards. EPA's inspectors review/evaluate for potential slug load discharge/s into the municipal wastewater treatment works, and implementation records required under federal industrial stormwater, and oil storage and transfer regulations.

IV. Disclaimer:

Unless otherwise noted, this report describes conditions at the Facility/property as observed by EPA, and/or through records provided to and/or information reported to EPA by Facility representatives and as understood by EPA. 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.

V. Facility Description & File Review

The Facility's part of MJM Holding Group and is a highly customized cable and wire manufacturing facility dating back to 1898. The Facility includes two wire and cable manufacturing buildings in Lisbon, NH, i.e., Riverside and Trackside buildings.

The Facility reported on September 21, 2020 to EPA in its No Exposure Certification (NEC) for Exclusion from EPA's Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities (MSGP) a primary standard industrial classification code of 3357 (Nonferrous Wiredrawing & Insulation). On-site manufacturing processes include wire drawing, plating, braiding, cabling, insulating, and extrusion services. The Facility employs about 400 people, 3-shifts per day, Monday through Friday.

Average production rate for drawn wire for the Facility is approximately 11,300 pounds per day. Facility process wastewaters that discharge into the sewer system include: contact cooling waters, non-contact cooling waters and mop waters. The Facility also generates wastewaters

² National Pollutant Discharge Elimination System ("NPDES").

from silver and tin metal plating operations, but these wastewaters are transported off-site as hazardous waste for precious metals reclamation. The overall process wastewater flows from the Facility introduced into the municipal sewer system have decreased between 2017 and 2019. The reduction in overall discharge flow to the POTW is from the elimination of mop waters which are drummed and transported off site for disposal.

Reported Total Annual Discharge Flow (gallons) to Publicly Owned Treatment Works (POTW)		
Lisbon Discharge Permit Date	11/14/2017	09/23/19
Contact Cooling Waters	26,973	27,723
Non-Contact Cooling Waters	640	640
Mop Waters	11,220	0
Total	38,833	28,363

At the time of the inspection, the Facility doesn't meet the federal definition of a *Categorical Industrial User* (CIU)³ because contact cooling and heating wastewaters are not subject to a categorical pretreatment standard under 40 C.F.R. §463.15. Wastewaters from contact cooling and heating must only comply with General Pretreatment Regulations, 40 C.F.R. Part 403. Further, the Facility doesn't meet the federal definition of a *Significant Industrial User* (SIU). The amount of wastewater generated and introduced into the POTW from contact cooling and heating operations are less than 25,000-gallons per day and contribute to less than 5 percent of the average dry weather hydraulic or organic capacity of the POTW. At the time of the inspection there did not appear to be reasonable potential for process wastewaters including contact cooling and heating wastewaters to adversely affect POTW operations or for violating any pretreatment standard or requirement. Please note, if wastewaters from silver and tin plating operations are transported and introduced into another POTW or the Town of Lisbon's POTW in the future, then the Facility would be identified as a *Categorical Industrial User* and thus a *Significant Industrial User* and subject to pretreatment reporting requirements in 40 C.F.R. §403.12, i.e., Baseline Monitoring Report and Periodic Reports on Compliance. Regarding the Facility's silver and tin electroplating operations, the operation would be considered a zero discharge categorical industrial user operation and the Region may request the Facility provide annually a certification indicating wastewaters from the operation continue to be zero discharge into a POTW.

The Facility is still required to provide EPA and the POTW with certain information required under the General Pretreatment Regulations. For example, under 40 C.F.R. §403.12(f), Notice of Potential Problems, including slug loading. All ... Industrial Users shall notify the POTW immediately of all discharges that could cause problems to the POTW, including any slug loadings, as defined by 40 C.F.R. §403.5(b). Under 40 C.F.R. §403.12(j), Notification of Changed Discharge. All Industrial Users shall promptly notify the EPA and the POTW in advance of any substantial change in the volume or character of pollutants in their discharge.

³ <https://www3.epa.gov/npdes/pubs/bull03.pdf>

As noted above, on September 22, 2020, the Facility⁴ submitted/filed a NOE under EPA's NPDES MSGP, the regulations for which can be found at 40 C.F.R. §122.26(g). The NOE only identifies the Facility's 130 North Main Street/Trackside Plant. The Facility may have inadvertently forgot to include on the NOE, under Facility Information, the property located at 145 North Main Street/Riverside Plant. The Facility should amend its NOE to include its operations at the Riverside Plant. The current NOE NPDES ID NHNOE3250 remains in effect and will expire on September 22, 2025, unless your facility becomes unable to maintain its eligibility for an exclusion sooner than that date. If changes at a facility result in industrial activities or materials becoming exposed, the no exposure exclusion ceases to apply⁵.

Since October 30, 2000, EPA has reissued four MSGPs for industrial stormwater discharges. The first on October 30, 2000 (2000-MSGP), second on September 29, 2008 (2008-MSGP), third on June 4, 2015 (2015-MSGP) and the fourth on September 29, 2021 (2021-MSGP). According to EPA's records, the Facility received authorization on January 24, 2001 for authorization under the 2000-MSGP (NHR05A520), and on May 29, 2009 for authorization under the 2008-MSGP (NHR05BQ44). On October 28, 2010, November 17, 2015 and again on September 21, 2020, the Facility received conditional exclusion for no exposure.

On October 14, 2021, EPA was provided with a June 2016 oil spill prevention, control, and countermeasure (SPCC) plan interim report. The report (prepared by HRP Associates, Inc.) indicates the certifying engineer (at that time) required further information to complete/finalize the plan and urges the Facility to reconcile certain questions and supply the necessary information to the certifying engineer. Following the site inspection, the Facility informed EPA that they had worked with HRP Associates, Inc. in the past to develop the SPCC plan, but it was never finalized. Since at least June 2016, the Facility had knowledge that a federal oil SPCC plan is required for the Facility. On October 19, 2021, EPA e-mailed the Facility a form entitled Notice of SPCC Inspection with Deficiencies for failing to have an oil SPCC plan.

VI. In-Briefing, September 14, 2021

The inspection was announced and contact with Facility personnel occurred as early as August 19, 2021. On September 14, 2021, EPA inspectors Canzano and Coombs coordinated a meeting with New England Wire personnel (Team⁶) via Microsoft Teams.

Inspector Canzano informs the Team EPA would be performing a site inspection on September 22, 2021. The site inspection will include collecting wastewater samples. Inspector Coombs offers, if requested, to split the samples with the Facility. The inspection will include, but is not limited to, a review of industrial stormwater activities, oil and chemical storage and transfer locations, categorical pretreatment manufacturing operations, wastewater evaporator and discharge monitoring location/s.

⁴ Thomas White.

⁵ <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-conditional-no-exposure-exclusion>

⁶ Richard Knapp, Regulatory Compliance Officer, Robert Norman, Facility Manager, and Dave Combs, Health and Safety Officer.

Prior to performing the inspection Inspector Canzano requested copies of the Facility's MSGP stormwater pollution prevention plan (SWPPP) and SPCC plan. Facility personnel indicated the Facility filed a conditional NOE under EPA's MSGP so no SWPPP is required and facility believes it may not require a SPCC plan.

Inspector Canzano explains EPA's site inspection protocol and health and safety measures. Inspectors will limit amount of time in interior spaces due to COVID considerations when viewing certain metal finishing and plastic molding and forming (extrusion) manufacturing operations and wastewater compliance monitoring location/s, and EPA will inspect only the Facility's Riverside Plant. Facility personnel indicate manufacturing operations in the Trackside Plant are same as Riverside Plant.

EPA will take photographs and review certain spaces for potential chemical spill paths to the sanitary sewer system which could cause or contribute to *Pass Through*, or *Interference* at the POTW. Facility representatives inform EPA inspectors all floor drains in the plant are sealed and the Facility doesn't have a formal/written Slug Discharge Control Plan.

VII. Site Inspection – September 21, 2021

EPA inspectors Canzano and Coombs arrived at the site at ~9:00 a.m. and are greeted at the entrance door by Mr. Knapp, Mr. Norman, and Mr. Combs. EPA inspectors present credentials. Facility representatives grant permission for EPA inspectors to enter the Facility and conduct the site inspection. EPA inspectors and Facility representatives gather in a large meeting room to review health and safety protocol and logistics for conducting the inspection and collecting wastewater samples.

Inspector Canzano explains EPA would like to limit the amount of time in all interior building spaces for only the Facility's Riverside Plant and would like to view the Plant's wastewater monitoring point/s, boiler room/s, plating room, certain production and chemical storage areas, and wastewater evaporator. EPA inspectors will be reviewing, among other things, certain interior spaces for potential chemical slug load/spill to the sanitary sewer system.

Regarding the collection of wastewater samples, Inspector Canzano indicates EPA will be collecting samples from locations identified in Facility's industrial discharge permit issued by the Town of Lisbon on September 23, 2019, i.e., extrusion cooling and heating units EX2 and EX12. Inspector Canzano also indicated EPA will collect a wastewater sample from a manhole that represents Facility combined sanitary and process wastewaters entering the POTW (end-of-pipe) from the Riverside Plant. Inspector Canzano explains federal prohibitions apply at end-of-pipe. Inspector Coombs explains EPA's sampling protocol and offers to split samples. Facility personnel decline the offer. Samples collected at EX2 and EX12 will be analyzed by EPA for hydrogen ion concentration (pH), total chlorine residual (TRC), and categorical metal finishing pollutants of concern listed in 40 C.F.R. Part 433, while sampling for only pH at end-of-pipe manhole.

Inspection of Interior Spaces - Riverside Plant

Facility representatives escort EPA inspectors through the plant to view certain production floor areas and contact cooling extrusion units, the silver and tin wire electroplating room, boiler, and wastewater evaporator rooms.

The EPA sampling location for contact cooling extrusion units are collected from each unit's water reservoir, i.e., EX2 and EX12. Inspector Coombs prepares sample bottles and documents certain elements associated with collecting a grab wastewater sample. Facility personnel indicated chiller unit/s can cool or heat water for the extrusion process. Each unit's reservoir has a capacity of about 15-gallons and water from the unit is pumped to an extrusion process where water comes in contact thereby cooling product as it exits the process in a trough where it then travels through piping back to the chiller unit. Some wire and cable products may be coated with extruded insulations including, but not limited to, polyester, nylon, and silicone rubber. Inspector Coombs completes the job of collecting a wastewater sample and testing for pH, EX2 pH is 7.30 S.U. and for EX12 its 7.23 S.U. Inspector Coombs informs Mr. Norman EPA will also analyze for metals, cyanide, base/neutrals and acid, and volatile organic compounds.

Facility personnel indicate recirculation chiller EX2 is used to process the greatest variety of different colors while EX12 is used to process the greatest variety of thermoplastics. The sampling locations are in Building #7 of the Riverside Plant. The extrusion process consists of a pay-off reel of wire or cable, a preheated unit which heats wire prior to entering the extruder, a feed hopper which contains pelletized plastic compounds, a throat (where the hopper sits) which is cooled to maintain the pelletized form of the compounds prior to entering the extruder, an extruder which melts the plastic compound and applies it onto the wire or cable, a cooling trough which cools the extruded wire or cable and finally a take up reel which spools the finished product. The water supplied to the throat and trough is cooled by being recirculated through the chiller units. The recirculated water contained within the chiller units is dumped into the sewer periodically, i.e., once per week.

Regarding contact cooling water units, Facility personnel explain the Facility has a total of 29 extrusion lines. The Trackside Plant has 3 while the Riverside Plant has 26 extrusion lines.

The Facility primarily uses copper that is 5/16-inch rod which is drawn to a specified gauge. The Facility can also process bronze and stainless steel which is not drawn to specified gauge but rather purchased in dimensional form. Copper rod can be drawn to 20-gauge (.032-inch) wire. An emulsion is used in drawing machines for lubrication. The lubrication is an emulsion and is filtered and recirculated. Spent emulsion is removed from machines and evaporated in an on-site evaporator. Some drawing machines have non-contact cooling water in a chiller servicing the machine and water is changed out periodically (once per year) and is discharged to the sewer.

Facility personnel explain in the basement of the building are four open top tanks containing an oil and water mixture (emulsion) from drawing machines. Two tanks have a volume of 4,700-gallons, one tank (for the Rod Machine) has a volume of 4,200-gallons, and one tank (for the 48-inch wire machine) has a volume of 2,500-gallons. EPA inspectors elected not to enter the below grade/basement area of the building and view the tanks. Inspector Canzano explain that the

emulsion, because it contains oil, is subject to the oil spill rule and should be included in a SPCC plan.

After drawing the copper wire, it may require tin and or silver plate. For tin-plated copper, the copper wire is pulled through a flux bath consisting of a proprietary acid followed by a molten tin bath. The tin-plated copper wire is air cooled and spooled. For superconductor wire, silver is mixed with the molten tin bath. The copper wire is pulled through the molten bath and is cooled with water. Cooling water is recirculated from holding tank. No water is discharged from either plating process. Facility personnel indicated that the Facility no longer performs nickel plate on copper wire. Nickel plating stopped in 2000.

EPA inspectors viewed the plating room and a boiler room. The Facility has a tin and silver wire plating lines. In the room inspectors observe three 55-gallon drums containing cyanide waste and labeled as hazardous waste. Facility personnel explain the room has no floor drains and is specifically designed and constructed to contain a spill. Wastewaters from the operation are sent off site for silver reclamation and transported under manifest as hazardous waste. Any liquid/s spills would remain on the floor in the room and the floor in certain area/s is alarmed to detect spills.

Inspectors observed two oil fired boilers. Boilers are fed from a 200-gallon day tank. Facility personnel indicated that the day tank and feed system to the boilers is expected to be replaced. The room has a sealed floor drain. Inspector Canzano recommends periodically inspecting the integrity of the drain. Facility personnel indicated that the Riverside and Trackside Plants each have a 15,000-gallon underground storage tank for storing oil for the boilers. Mr. Norman explain the Facility has a total of 8-boilers; 4-boilers at the Riverside Plant and 4-boilers at the Trackside Plant.

Facility personnel show EPA inspectors the evaporator room, hazardous waste storage room, an enclosed loading dock/receiving area, and a satellite waste drum storage area on the production floor. In the evaporator room Facility personnel identify for EPA inspectors (11) 55-gallon oil drums. The evaporator usage logbook shows on June 2nd and September 14th of 2021 the Facility evaporated 220-gallons and 110-gallons of spent drawing solution from the wire drawing department respectively. Inspector Canzano measures the dimensions of the evaporator and estimates the volume of the unit to be about 223-gallons.

In a certain area of the plant, Facility representatives identify for EPA inspectors a satellite waste drum storage area with (2) 55-gallon drums containing oil and labeled/identified as hazardous waste. One drum is labeled Mobil Gear Oil while the other is labeled Varnish, Isopropyl Alcohol and Mineral Spirits. Both drums positioned on a spill pallet and the drum containing Varnish, Isopropyl Alcohol and Mineral Spirits is electrically grounded. Inspector Canzano explains each drum is subject to the SPCC rule. EPA Inspectors enter the Facility hazardous waste storage area. Inspector Canzano observes several 55-gallon drums and explains if any contain oil then the drums are to be identified in a SPCC plan. The room doesn't appear to have floor drain/s and drums are placed on spill pallets, and certain drum/s observed to be electrically grounded.

Inspection of Exterior & Sampling Manhole – Riverside Plant

Inspector Coombs and Canzano are escorted outside the building by Facility personnel to a certain sewer manhole in front of Building #8⁷. Mr. Norman explains all process and sanitary flows exiting the Riverside Plant pass through the manhole before entering the POTW. Inspector Canzano explains federal wastewater discharge prohibitions would apply at this manhole. Inspector Canzano recommends the location be marked and placed on a Facility site diagram. Mr. Norman explains the Facility is not required by the POTW to conduct monitoring at this location.

Inspector Coombs prepares sampling equipment and documents certain elements associated with collecting a grab wastewater sample. Inspectors observe two pipes in the manhole well, an inflow pipe and an outflow pipe, and intermittent low velocity flow through the well. Inspector Coombs completes the job of collecting a wastewater sample, testing for pH and the result is 7.32 S.U. Inspector Canzano explains the federal wastewater pH probation standard is not less than 5.0 S.U.

EPA inspectors are shown by Facility representatives the location of the Facility's 15,000-gallon underground storage tank used for No. 2 fuel oil for boilers. The tank's fill port and oil truck transfer/off-load area are located up-gradient from the Ammonoosuc River and an oil release from the activity has reasonable potential to spill to the River through Outfall #10. Inspector Canzano recommends all outfalls, especially Outfall #10 be marked, during times of much snow coverage and have in proximity a spill plug/balloon specifically for Outfall #10 discharge pipe. Mr. Knapp tested for EPA inspectors the tank overflow audible and visual alarm system. Mr. Norman explains all oil transfers are performed with a Facility representative overseeing the activity.

Facility representative and EPA inspectors walk the property boarding the Ammonoosuc River viewing stormwater outfalls and industrial materials and activities. Mr. Norman identifies for EPA inspectors the location of each outfall pipe and certain catch basins that drain to certain outfalls, i.e., Catch Basin #40 and #41, next to Building #5, are connected to Outfall #10. Connected to Outfall #10 is a grass treatment swale estimated to 100-feet in length by 10-feet in width. EPA inspectors observe exhaust vents and stacks on Building #5, garbage compactor unit and propane generator, liquid nitrogen storage system and air-cooled chiller units, several pad-mounted and pole-mounted electrical transformers and loading docks. Mr. Norman indicates transformers are owned by the Facility. Inspector Canzano explains oil capacity of the transformers is most likely, due to the size of the transformers, greater than 55-gallons and is considered oil-filled equipment under the SPCC rule and would be included in the SPCC plan.

Mr. Norman explains building roof drains and pavement runoff flow to different outfalls from different parts of the plant and property surrounding the plant and has nine drainage areas and some of the areas do not discharge, i.e., the drainage area in front of the plant along Route 10. Inspector Canzano notes certain outfalls could not be inspected (Outfall #4 through Outfall #7) because they are not accessible. The River embankment/slope is a hazard. Inspector Canzano

⁷ October 14, 2010 Water Quality No Exposure Assessment, Figure 2.

recommends placing a life vest in proximity of the outfalls and an engineered solution for safer access to inspect outfalls, i.e., lifeline system/s.

While conducting the site walk, Inspector Canzano notes loading docks are under cover, the plant is not storing drums, barrels, or tanks of any type outside, and doesn't have aboveground tank/s. The plant's propane powered generator, cooling chiller units and the liquid nitrogen storage system is in an area that is surrounded by a physical barrier (berm) to prevent runoff in the event of internal leaking lines or valves, and the solid waste container is a sealed unit. General purpose vehicles observed around the plant did not appear to be leaking fluids or otherwise a potential source of contaminants. Building exhaust systems (stacks/vents) do not appear to be emitting particulate matter, i.e., no dust/solids observed on the ground or side of building. Inspector Canzano explains particulate matter emission from roof stacks/vents do not cause a condition of exposure, provided they are compliant with other applicable environmental protection programs (e.g., air quality control programs) and do not cause storm water contamination⁸.

VIII. Closing Conference

Following the site walk the following issues were discussed.

- Currently, the Facility doesn't meet the federal definition of a Significant Industrial User under 40 C.F.R. §403.3(v). The Facility's silver and tin electroplating processes are zero-discharge categorical unit operations. If the operation/s should change and begin introducing wastewaters into a POTW then the Facility would become a Categorical Industrial User/Significant Industrial User. Inspector Canzano recommends the Facility provide EPA with a zero-discharge certification statement for electroplating wastewaters. The certification statement would be submitted at least annually and should be prepared in accordance with 40 C.F.R. §403.6(a)(2)(ii).
- While the Facility is not a SIU, the federal Pretreatment Regulations require all Industrial Users promptly notify the Control Authority (EPA and POTW) ... in advance of any substantial change in the volume or character of pollutants in their discharge, 40 C.F.R. §403.12(j).
- Currently, there did not appear to be a significant potential for a chemical spill (Slug Discharge) to be introduced to the POTW while the Facility is operating during normal business hours or is occupied, 40 C.F.R §403.12(f)(2)(vi). A Slug Discharge (40 C.F.R. §403.8(f)(2)(iv)) 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. EPA is recommending the Facility review EPA's Control of Slug Loadings to POTW

⁸ Guidance Manual for Conditional Exclusion from Storm Water Permitting Based On "No Exposure" of Industrial Activities to Storm Water.

Manual, particularly employee training program for reporting and responding to an accidental chemical spill to the POTW.

- Currently, there did not appear to be industrial activities or materials exposed to precipitation or other source of pollutants to the environment which would require coverage under the MSGP. Even though the Facility maintains a no exposure exclusion status, Inspector Canzano recommends Facility personnel periodically review EPA's guidance manual for conditional exclusion from stormwater permitting.
- EPA inspections observe several oil-filled containers, drums and equipment and are informed by Facility personnel that the Facility may have total oil storage capacity greater than 1,320-gallons. At the time of the inspection the Facility was unable to provide inspectors with a SPCC plan. Inspector Canzano informs Facility personnel to perform a Facility wide self-audit for all oil containers and develop a SPCC plan if it meets the capacity threshold for this requirement.

End of report.

Attachment

September 22, 2021 Wastewater Sampling for Industrial Wastewaters

EPA conducted sampling during the inspection on September 22, 2021. Samples of effluent were collected at 2 extruder line collection tanks (“EX2” and “EX12”), which are recirculated contact cooling water that is used during the wire treating process. According to facility representatives, each tank holds approximately 15 gallons and is batch-discharged weekly on Fridays to the town sewer via sinks located adjacent to each tank on the processing floor.

Inspector Coombs collected grab samples from the EX2 and EX12 for total metals, total cyanide, semi-volatile organic compounds (BNAs), and volatile organic compounds (VOCs) and instantaneous grab samples for pH and Total Residual Chlorine (TRC) for in-situ screening. At 10:18 HRS, sample collection at EX2 was initiated and the sample was field tested for pH using an Oakton “pHtestr” pH meter and TRC using a HACH colorimeter. The pH was 7.30 Standard Units (S.U.) and the TRC was 0.00 mg/L. At 10:33 HRS, sample collection at EX12 was initiated and the sample was field tested for pH and total residual chlorine. The pH was 7.23 S.U. and the total chlorine was 0.06 mg/L.

The total metals samples were collected in 250-mL HDPE containers and preserved with nitric acid to attain a pH of less than 2 S.U. The total cyanide samples were collected in 250-mL HDPE containers and preserved with sodium hydroxide to attain a pH of above 12 S.U. The BNA samples were collected in 1-liter amber jars with no preservative added. The VOC samples were collected in 40-mL amber vials and preserved with hydrochloric acid to attain a pH of less than 2 S.U. All samples were then placed in coolers with ice to maintain an internal temperature of less than 6 degrees Celsius and delivered to the to the EPA New England Regional Laboratory in North Chelmsford, MA to be analyzed.

At 11:13 HRS, the EPA inspection team collected an instantaneous grab sample for pH at the facility’s final sewer connection to the POTW via a manhole in the parking lot (“end of pipe” location) and detected the pH at 7.32 S.U.

Sampling and Analytical Results Summary

The table below provides a summary of the laboratory analytical results and field parameters collected during the inspection. For a full list of compounds analyzed for each parameter and their results, refer to the laboratory reports that are attached to this inspection report.

Sample #	Sample Date and Time	Sample Type	pH (S.U.)	TRC (mg/L)	Analytical Results (mg/L unless otherwise noted)		Pretreatment Standards for 40 CFR 433.15	
							Daily Maximum (mg/L)	Monthly Average (mg/L)
EX2	9/22/21 10:18 HRS	Grab	7.30	0.00	VOCs¹		2.13	N/A
					Acetone	0.39		
					Methyl Ethyl Ketone	0.31		
					Tetrahydrofuran	0.0043		
					BNAs¹		2.13	N/A
					Bis(2-ethylhexyl) - phthalate	0.0068		
					Total Cyanide	ND	1.20	0.65
EX12	9/22/21 10:33 HRS	Grab	7.23	0.06	Total Metals²		2.13	N/A
					Cadmium	ND		
					Chromium	ND		
					Copper	0.21	3.38	2.07
					Lead	ND	0.69	0.43
					Nickel	ND	3.98	2.38
					Silver	ND	0.43	0.24
					Zinc	0.1	2.61	1.48
					VOCs¹		2.13	N/A
					Acetone	0.016		
					Methyl Ethyl Ketone	0.0084		
					Tetrahydrofuran	0.0055		
					BNAs¹	ND	2.13	N/A
					Total Cyanide	ND	1.20	0.65
					Total Metals²		2.61	1.48
					Cadmium	ND		
					Chromium	ND		
					Copper	0.38		
					Lead	ND		
					Nickel	ND		
					Silver	ND		
					Zinc	0.099		

Notes:

1: Compounds that were analyzed but not listed in this table are Not Detected above Reporting Limit (ND).

2: Metals within the pollutants of concern under the Metal Finishing Point Source Category under 40 CFR 433.15.