



REGION 1

BOSTON, MA 02109

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

Subj: Inspection Report – Clean Water Act (“CWA”)
National Pollutant Discharge Elimination System (“NPDES”)

From: Damian Bednarz, EPA Inspector **DAMIAN BEDNARZ** Digitally signed by DAMIAN
BEDNARZ
Date: 2025.01.17 14:15:32 -05'00'

Thru: Margarita Chatterton, EPA Inspector

To: File

I. Facility Information

- A. *Facility Name:* North Grafton Washington Mills, Inc.
- B. *Facility Location:* 20 N Main Street
North Grafton, MA 01536
- C. *Facility Contacts:* Roberto De La Torre
EHS Coordinator
- Steven Schmitt
Plant Manager
- John Winkler
Vice President of Operations
- Jim Barker
EHS Consultant
- D. *ID No(s):* MAR05J03J

II. Background Information

- A. *Date(s) of inspection:* 11/21/2024
- B. *Weather Conditions:* Approx 45 °F and 0.2” precipitation

- C. *US EPA Representative(s):*
Damian Bednarz
Margarita Chatterton
Elliot Anderson
- D. *State/Local Representative(s):*
N/A
- E. *Federally Enforceable Requirements Covered During the Inspection:*
National Pollutant Discharge Elimination System (NPDES) Multi-Sector General permit (MSGP) for Stormwater Discharges Associated with Industrial Activities) 40 C.F.R. § 122.26
- F. *Previous Enforcement Actions:*
None at the time of the inspection

III. Type and Purpose of Inspection

EPA conducted an announced inspection at Washington Mills (the “Facility” and/or “WM”) on November 21, 2024, located at 20 N Main Street, Grafton Massachusetts. The inspection was announced to the Facility by phone call approximately a week prior to the inspection. Damian Bednarz, Margarita Chatterton, and Elliot Anderson (“EPA Inspectors”) conducted an evaluation of industrial stormwater discharge permit requirements under EPA’s Multi-Sector General Permit (“MSGP”).

IV. Facility Description

WM has an associated primary Standard Industrial Classification (“SIC”) Code of 3291, defined as “establishments primarily engaged in manufacturing abrasive grinding wheels, abrasive-coated products, and other abrasive products¹”. WM’s website indicates it produces a multitude of abrasive products to be sold to customers for an array of end-use applications including but not limited to polishes, coatings, and grinding and blasting media. Products are defined by mineral and chemical compositions as well as particle or grit sizes. The Facility, also referred to as “Plant 1”, is located at 20 N Main Street, Grafton Massachusetts (Photo 1) and is authorized to discharge stormwater associated with industrial activity to the Quinsigamond River under the MSGP (Permit ID MAR05J03J). WM representatives also own and operate a neighboring complex located at 19 Mill Street, Grafton Massachusetts known as “Plant 2” (Photo 2), is also authorized to discharge stormwater associated with industrial activity to the Quinsigamond River under the MSGP (Permit ID MAR05J03K). Plant 1 primarily engages in the receiving and processing of raw materials, indoor and outdoor storage of materials, packaging of final product, business administration, and shipping/receiving. Plant 2 serves auxiliary to the functions at Plant 1, and features indoor and outdoor storage of equipment, indoor maintenance for specialized industry machines and vehicles, and shipping/receiving operations.

¹ SIC industry description via the NAICS (North American Industry Classification System) Association
<https://www.naics.com/sic-industry-description/?code=3291>

EPA Inspectors conducted an evaluation at both Plant 1 and Plant 2. After the Facility tour of Plant 1, EPA Inspectors and Facility Representatives continued the inspection at Plant 2. A separate report details observations and conditions observed at Plant 2. This report details observations from Plant 1 as they relate to industrial stormwater.

V. Inspection

EPA Inspectors arrived at the Facility at approximately 9:00 a.m. and departed at approximately 2:30 p.m.

A. Opening Conference

After meeting at the Plant 1 location, EPA Inspectors and Roberto De La Torre, Steven Schmitt, , John Winkler, and Jim Barker ("Facility Representatives") held an opening conference at the Facility's administration building at approximately 9:30 a.m. EPA Inspectors presented their credentials, and I explained the scope of the inspection. I asked if WM holds permit authorizations to discharge outside of its MSGP coverage. Mr. Schmitt explained that aside from the two MSGP permits for Plant 1 and Plant 2, the Facility does not have additional authorizations under the Clean Water Act ("CWA").

I asked Facility Representatives to describe general activities occurring at the Facility. Mr. Winkler explained that Washington Mills in Grafton, Massachusetts receives raw minerals and materials by train or by truck. Mr. Schmitt stated that 18-wheeler trucks bring in approximately 35 tons of material at a time. I asked how often raw materials arrive at the Facility, and Mr. Schmitt stated that materials generally arrive daily, however delivery frequency fluctuates. The Facility furnaces, crushes, and grades raw materials and packages final products in preparation for sale to customers. Mr. Schmitt stated that Plant 1 is associated with processing materials and Plant 2 has a primary function of shipping.

I explained that the inspection was prompted by a complaint submitted to EPA regarding illicit drain connections from indoor Facility industrial process areas to the Quinsigamond River. Facility representatives were unaware of such a connection. I asked if any Facility process utilizes water for treating and discharging wastewaters associated with industrial activity. Facility Representatives stated that there are no processes at WM that result in such discharges, and that products must remain dry during the entire production process. Mr. Winkler affirmed that the only wastewater generated at the Facility is sanitary wastewater. Ms. Chatterton asked whether vehicle washing occurs at the Facility, and Mr. Schmitt responded that WM does not conduct vehicle washing. Ms. Chatterton asked whether any chemicals are used at the Facility. Mr. Winkler described that the Facility used "red coat" and "seal coat" on some of its products, and that these materials are typically stored indoors.

I asked Facility Representatives whether oil-filled equipment is fueled and/or maintained on site, whether the Facility utilizes oil storage of any kind, and their capacities. Mr. Schmitt answered that two front loaders are fueled at Plant 2, and that all remaining vehicles are fueled offsite. Mr. Becker identified that Plant 2 has a 250 to 275 aboveground oil tank, and Mr. Schmitt explained that vehicle servicing mostly occurs off-site, apart from Milton Cat occasionally providing services for their front loaders.

I stated that I did not see signage of permit coverage visible from a public right of way and identified that public signage is required under 1.3.5 of the MSGP. Mr. De La Torres responded that the Facility would investigate this. Within a post inspection follow up from WM, a sign was installed in January 2025.

Ms. Chatterton asked how many people are employed at the Facility. Mr. Schmitt stated that approximately 55 people are employed across both Plants, and that an additional 20 employees work in administration based at this Facility.

I explained to Facility Representatives that at the time of the inspection, the Facility has a status of Significant Non-Compliance ("SNC"). According to EPA's Enforcement and Compliance History Online ("ECHO"), the Facility is in SNC due to a missing Discharge Monitoring Report ("DMR") with a monitoring period end date of September 30th, 2023. Mr. De La Torre assured that he would investigate this and correct the discrepancy, as he was confident there was no lapse in DMR monitoring during this period.

B. Facility Tour

EPA Inspectors and all Facility Representatives began the Facility Tour at approximately 10 a.m. I asked to first observe each outfall and outdoor conditions of the Facility.

Outfall 002:

At the center of the Facility, pavement is sloped such that stormwater flows towards outfall 002 and the train tracks located on-site (photo 3). I observed numerous shipping containers, staged trailers, and wooden pallets in this area (photos 4a, 4b, 4c). Stormwater continued northeast towards Outfall 002, and accumulated such that flow was visible near the Facility's boundary to the eastern train tracks (photos 5a, 5b). Stormwater continued under the train tracks through a riveted pipe approximately a foot in diameter before discharging to outfall 002 (photo 6). When asked, Facility Representatives were uncertain of the source of the other actively discharging pipe.

Outfall 001 and 003:

Continuing southward along the train tracks and eastern perimeter of the Facility, EPA Inspectors observed the principle raw material transfer point at the Facility (photos 7a, 7b). I observed a storm drain near the tracks (labelled "CB3", photos 7a, 7b, 8b). Directly north of CB3 and in line with the train tracks, I observed two additional drains (labelled "CB1" and "CB2", photos 9a, 9b, 10). CB1, CB2, and CB3 were collecting stormwater and fine materials at the time of the inspection.

Outside of building 1H, I observed a trench drain (labelled "CB5", photos 12a, 12b). I observed minimal stormwater flow cornering the building near a blue roll-off dumpster (circled in red, photos 12b, 12c). The neighboring blue roll-off dumpster was uncovered and filled with assorted waste (photo 13). North and outside of building 1C, I observed an additional stormwater drain underneath a cart (labelled "CB6", photo 14). Stormwater flow that bypasses CB5 and CB6 travels downgradient towards CB3's drainage area.

South of the stationary cart and material drop off location I observed a warehouse with riveted roofing containing piles of fine materials, a front loader, and surplus equipment staging (photos 11a, 11b). The warehouse entrance was open and downgradient of previously mentioned stormwater flow paths near CB3, CB5, and CB6.

EPA Inspectors and Facility Representatives continued south along the train tracks towards the outfall 001 discharge point. I observed fine sediment and material accumulation directly along the tracks (photos 15a, 15b). Facility Representatives explained that this is the location of outfall 001 (photos 15b, 16). Approximately 200 feet west of the train tracks and outfall 001, I observed uncovered material storage piles. A considerable accumulation of fine materials from these piles had escaped its concrete barrier containment due to their exposure to stormwater (photo 17). I observed flow channels travelling from the piles towards outfall 001 (photos 18a, 18b, 19).

Continuing west beyond the uncovered material storage area, EPA Inspectors observed red staining on the south side of the Facility's building 1C and on paved areas (photos 20a, 20b, 20c). I asked if there exists a stormwater drain within this area, and Facility Representatives pointed me to a catch basin situated under a leaf pile (labelled "CB4", photo 20d). The red staining was evident upslope and near an entrance to building 1C (photos 21a, 21b). I asked Facility Representatives if the source of the red staining was on the side of the building. Facility Representatives explained they could not previously identify the source of the concentrated red staining within building 1C (photo 20a). The red staining was observed downslope of an unknown source and towards CB4. Directly south of CB4 and towards the Quinsigamond River, Facility Representatives identified outfall 003 to EPA Inspectors (photo 23).

EPA Inspectors observed an additional catch basin towards the center of the Facility (labelled "CB7", photos 24a, 24b).

Additional observations:

At the time of the inspection, Facility Representatives were uncertain whether flow collected in on-site catch basins were tied into an existing stormwater conveyance system and discharged via outfall². EPA Inspectors and Facility Representatives discussed the need to know precisely where these stormwater drains eventually discharge.

Following the outdoor portion of the Facility Tour, I requested that Facility Representatives explain the indoor industrial processes occurring at the plant relating to production. I emphasized to observe areas where water may be involved in their processes. Facility Representatives assured that the only wastewater generated by the Facility is sanitary waste from on-site restrooms. Through the indoor Facility tour, I did not observe WM's production process to be producing process wastewaters at the time of the inspection.

EPA Inspectors observed red staining at the location of an industrial coating process within building 1C (photos 25, 26). The staining appeared to be sourced from the staging and utilization of "Micronox R01", or micronized red oxide (photos 27b, 27c), which Facility Representatives explained was a coating designed to prevent corrosion and enhance durability of various

² Mr. De La Torre, in a follow up dated December 18, 2024, to the EPA inspection, submitted a report conducted by contractors GPRS which appears to identify underground connections between CB1, CB2, CB3, and CB4 before discharging to outfall 003 (Photo 32). The report does not detail drainage lines of CB5, CB6, and CB7.

surfaces, and that WM uses both a red and silver coat in its production. Near this red oxide process, I observed a sink basin and floor drain (photos 28a, 28b). When asked, Facility Representatives were uncertain where the floor drain leads.

I observed a well structure labelled with “do not dump” warnings near Facility production and sorting operations (photo 31a). I asked if I could remove the cap and received permission. I observed standing water with a floating sheen (photo 31b) and asked what the purpose of this access port was, and where it leads. Facility representatives were uncertain of the purpose or connection of this access port.

C. Records Review

The Facility submitted the Storm Water Pollution Prevention Plan (“SWPPP”) and underground connections report conducted by GPRS, dated February 2021, by email to EPA Inspectors on December 18, 2024. I reviewed and referenced these materials in the writing of this report.

D. Closing Conference

EPA Inspectors and Facility Representatives returned to the conference room to conduct the closing conference. EPA Inspectors discussed the following areas of concern with the Facility:

- General conditions at the Facility indicate that the transfer and storage of materials should be managed more effectively such that materials do not escape their intended destinations and become exposed to stormwater.
- I requested that the Facility submit to me, by email, their SWPPP and any information regarding stormwater conveyance piping, tie-ins, and an illicit discharge study. I explained that it should be known where indoor drains lead to.
- The Facility, at the time of the inspection, is in SNC because of a missing DMR.
- Per the MSGP, dumpsters should remain closed when not in use.
- Considering a recent change of organization at WM, and a resulting unfamiliarity with on-site stormwater management, the Facility should become familiar with how stormwater interacts with the property and conduct regular training to its staff.
- Sweeping is not to be limited to indoor areas, sweeping of outdoor areas must be implemented to control the discharge of particulate matter.
- EPA Inspectors observed a floor drain in a maintenance building at Plant 2. It’s function and connection should be investigated.
- Regarding the elevator sump pump, investigate the frequency of discharge and communicate how waters are disposed of when pumped.

EPA Inspectors departed the Facility at approximately 2:30 p.m.

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.