



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

Sent via Electronic Mail

Louis Tarentino, Project Manager
EOMS Recycling
200 Oak Hill Way
Brockton, MA 02301

Subject: August 1, 2022, EPA Inspection

Dear Mr. Tarentino:

On August 1, 2022, the U.S. Environmental Protection Agency ("EPA") performed an inspection at EOMS Recycling regarding compliance with the National Pollutant Discharge Elimination System program of the Clean Water Act. A copy of the inspection report is included as an attachment to this letter.

Specific comments, informed by the inspection, are as follows:

- Ensure that all containers are water-tight, and kept closed, sealed, and secured when not being actively used; and if stored outside, use a spill containment pallet or similar device to capture small leaks or spills (Part 2.3.3. of the Construction General Permit (CGP)).
- Clean, or remove and replace, the inlet protection measures as sediment accumulates, the filter becomes clogged, and/or performance is compromised (Part 2.2.10 of the CGP).
- The Stormwater Pollution Prevention Plan (SWPPP) indicates that inspections are done once every seven days. Please provide copies of inspection reports for the months of May, June and July of this year. If you do not have inspection reports for this time period, please explain why. Part 4 of the CGP details inspection frequency requirements.

Where applicable, please provide a response to these comments in an electronic format to the following technical contact:

Stephanie Tougas
U.S. Environmental Protection Agency
5 Post Office Sq - Suite 100
Boston, MA 02109-3912
(617) 918-1798
tougas.stephanic@epa.gov

Legal issues may be directed to Jeff Kopf, Senior Enforcement Counsel, at (617) 918-1796 or at kopf.jeff@epa.gov.

Sincerely,

Stephanie Tougas
Water Compliance Section
Enforcement and Compliance Assurance Division

Enclosures:

Inspection Report for August 1, 2022, EPA Inspection

CCs (electronic only):

Judith Schmitz, MADEP
Jeff Kopf, EPA



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Drafted Date: 8/3/2022
Finalized Date: 8/16/2022

Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination
System ("NPDES")
EOMS Recycling

From: Stephanie Tougas, Inspector

Thru: Damian Bednarz, Inspector

To: File

I. Facility Information

- A. Facility Name:* EOMS Recycling
- B. Facility Location:* 200 Oak Hill Way
Brockton, MA 02301
- C. Facility Contacts:* Louis Tarentino, Project Manager
508-889-1001, ltarentino@gmail.com
- EOMS Recycling
PO Box 3606
Brockton, MA 02304
- D. NPDES ID No(s):* MAR100151

II. Background Information

- A. Date(s) of inspection:* August 1, 2022
- B. Weather Conditions:* Sunny, 80 degrees F
- C. US EPA Representative(s):*
Stephanie Tougas
Damian Bednarz
- D. State/Local Representative(s):* N/A

E. Federally Enforceable Requirements Covered During the Inspection:
2022 EPA Construction General Permit

F. Previous Enforcement Actions:
None

III. Type and Purpose of Inspection

Evaluation

IV. Facility Description

The site is approximately 21 acres and located partially in Brockton and partially in West Bridgewater. The portion of the site that is composting is in West Bridgewater. There is an access road to the site that runs over a stream. The stream below the stream crossing is Edson Brook. The brook flows westerly under the site entrance and then south until its confluence with the Salsbury Plain River. Edson Brook is approximately 600 feet from the west side of the perimeter of the site. The site appeared to not have any recent earth disturbance, and the center was rough and graded.

V. Inspection

We arrived at the facility unannounced at approximately 11:45 AM.

I called the number listed on the NOI for operator point of contact. The person who answered the phone told me they'd have Mr. Tarentino call me back. I shortly received a call from Mr. Tarentino. I explained that I was on site to conduct a routine construction general permit inspection and requested access, to which he granted. I asked Mr. Tarentino about the stormwater management. He said he is currently transitioning from their current consultant, Eric Dias, to a new consultant, "MBL". I asked where a copy of the SWPPP was located, and he said the engineer has it. I said I would follow up with an email requesting the SWPPP. I said we were going to walk around the site observing erosion controls and invited him to attend if he would like but said he did not have to attend. Mr. Tarentino said it was okay for us to go without him. He mentioned that there is not much active building on the site due to supply chain issues, but they plan to build three buildings.

A. Opening Conference

Mr. Tarentino was not present on the inspection, so we did not hold an in person opening conference.

B. Facility Tour

We began our site walk starting at the entrance. I noted DEP file numbers posted but did not observe any posting of their CGP coverage. I noted haybales along each side of the stream crossing and a grassy swale adjacent to the brook.

We continued walking south along the west side of the site. I noted multiple areas where sediment had eroded into the vegetation. I also noted areas where sediment had breached the erosion control – I observed both silt fences and silt socks where this had occurred.

We continued walking towards the back of the site where the composting facility is located. There was someone actively excavating in the compost.

We continued our tour moving back towards the entrance along the northeast perimeter. I noted another area where a silt fence had been breached.

We walked towards the center of the site where I observed four 55-gallon drums. The drums were sealed but did not have secondary containment.

We walked towards the site entrance where I observed another 55-gallon drum. This drum did not have a lid on it. We looked inside the drum and noted a liquid that appeared to be oil. I did not see anyone around who appeared to be actively using the drum.

In the entrance area before the stream crossing, we observed a catch basin that was full of sediment with storm drain inlet protections that appeared to no longer be functioning.

D. Closing Conference

We departed the site at approximately 12:30PM. When I arrived home, I followed up with Mr. Tarentino with an email indicating we would send an inspection report within 60 days. I asked for a copy of the SWPPP and mentioned the 55-gallon drum at the entrance lacking a lid.

Post inspection follow up: Mr. Tarentino provided me with a copy of the SWPPP and informed me that the drums have been removed from the site.

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.

Photo log

RIMG0387.JPG – entrance with DEP file number
RIMG0388.JPG – entrance
RIMG0389.JPG - entrance
RIMG0390.JPG – hay bales on stream crossing
RIMG0391.JPG – “”
RIMG0392.JPG – vegetated area bordering stream
RIMG0393.JPG – retention basin
RIMG0394.JPG – eroded sediment into vegetation

RIMG0395.JPG-“”
RIMG0396.JPG – another area of eroded sediment into vegetation
RIMG0397.JPG –“”
RIMG0398.JPG –“” also buried silt sock
RIMG0399.JPG – area with sediment deposits in vegetation
RIMG0400.JPG – basin outlet
RIMG0401.JPG – grassy basin
RIMG0402.JPG – silt fence with accumulated sediment
RIMG0403.JPG - basin
RIMG0404.JPG - basin
RIMG0405.JPG – halfway along southern edge of site
RIMG0406.JPG – compost area
RIMG0407.JPG – grassy area
RIMG0408.JPG – silt fence down and sediment accumulated
RIMG0409.JPG – four 55 gallon drums lacking secondary containment
RIMG0410.JPG – “”
RIMG0411.JPG –“”
RIMG0412.JPG – “”
RIMG0413.JPG – buried silt sock
RIMG0414.JPG – “”
RIMG0415.JPG – 55 gallon drum not being actively used without a lid, contains oil inside
RIMG0416.JPG – oil filter
RIMG0417.JPG – close up of drum
RIMG0418.JPG – catch basin with accumulated sediment
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