



REGION 2

NEW YORK, N.Y. 10007

January 2, 2024

Via Electronic Mail To: James.Vreeland@crucible.com

James Vreeland, Director of Maintenance and Engineering
Crucible Industries, LLC
575 State Fair Blvd.
Syracuse, NY 13209

**Re: REQUEST FOR INFORMATION, Pursuant to Section 308 of the CWA
Docket No. CWA-IR-24-006
Crucible Industries, LLC
SPDES Permit No. NY0000825**

Dear Mr. Vreeland:

The purpose of this Request for Information ("RFI") is to require Crucible Industries, LLC ("Crucible") to submit information to the United States Environmental Protection Agency ("EPA") regarding compliance with its New York State Department of Environmental Conservation ("NYSDEC") State Pollutant Discharge Elimination System ("SPDES") Permit No. NY0000825, which imposes requirements under the Clean Water Act ("CWA") on Crucible. On September 27, 2023, EPA conducted a Compliance Evaluation Inspection ("CEI") of the Crucible facility located at 575 State Fair Boulevard in Syracuse, New York (the "Facility"). Findings from the CEI, which are detailed in the attached CEI Report, included Potential Non-Compliance Items and Areas of Concern.

Section 308(a) of the CWA, 33 U.S.C. § 1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether any person is in violation of Section 301 of the CWA, 33 U.S.C. § 1311, the EPA shall require the submission of any information reasonably necessary to make such a determination. Under the authority of Section 308 of the CWA, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances.

REQUEST FOR INFORMATION

Within **forty-five (45) calendar days** of receipt of this RFI, you are hereby required to submit the following to EPA:

1. A copy of the Facility's current Best Management Practice ("BMP") plan;

2. A written/photographic response to Potential Non-Compliance Items #2.a, #2.b and #2.c in the attached CEI Report, describing how Crucible has addressed or will address these items;
3. A proposed expedited schedule for addressing maintenance/repairs needed to Tank A of the wastewater treatment plant ("WWTP");
4. A copy of written Operation & Maintenance ("O&M") procedures for the WWTP; and
5. A written/photographic (where applicable) response describing how Crucible has addressed or will address the Areas of Concern in the attached CEI Report.

CERTIFICATION

Any documents to be submitted by Crucible shall be signed by an authorized representative of the respective entity (see 40 C.F.R. § 122.22), and shall include the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitted false information, including the possibility of fine and imprisonment for knowing violations."

All information required to be submitted by this RFI shall be emailed to the following EPA representatives:

Justine Modigliani, P.E., Acting Manager, Water Compliance Branch, Modigliani.Justine@epa.gov
Katherine Green, Acting Supervisor, Clean Water Act Compliance Section, Green.Katherine@epa.gov

Failure to provide the required information may subject Crucible to civil/criminal penalties pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. Failure to comply with the RFI may also subject Crucible to ineligibility for participation in work associated with Federal contracts, grants or loans. If you have any questions regarding this RFI or the CEI Report, please feel free to contact Katherine Green of my staff via phone at (212) 637-4226 or via email at Green.Katherine@epa.gov.

Sincerely yours,



Digitally signed by JUSTINE
MODIGLIANI

Date: 2024.01.02 17:06:20 -05'00'

Justine Modigliani, P.E., Acting Manager
Water Compliance Branch

Attachment: CEI Report for 9/27/23 CEI

Cc: Ed Hampston, Director, Bureau of Water Compliance Programs, NYSDEC
Thomas Vigneault, Regional Engineer, NYSDEC Region 7
Valarie Ellis, Division of Water, NYSDEC Region 7
Matt Widay, Division of Water, NYSDEC Region 7