



**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)*

Ms. Sheena Kinkeade, Sr. EHS Manager
PCC Structural, Inc.
839 Poquonnock Road
Groton, Connecticut 06340
sheena.kinkeade@pccstructurals.com

Re: Clean Water Act Inspection on August 23, 2022

Dear Ms. Kinkeade:

On August 23, 2022, the U.S. Environmental Protection Agency (“EPA”) conducted an announced inspection at PCC Structural, Inc. locations at 24 Granite Street in Northfield, New Hampshire, and 35 Industrial Park in Franklin, New Hampshire.

The inspector reviewed and observed metal finishing, mold and casting operations and process wastewater collection and treatment systems, industrial material and activities potentially exposed to precipitation, and oil storage and transfer areas. The inspector also reviewed chemical storage areas for potential slug load discharge/s 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 inspector observed industrial materials and activities not under cover and/or not fully within a storm-resistant shelter and having potential to be exposed to rain. At the company’s Northfield plant, the inspector observed spilled industrial waste/solids from wastewater treatment in a roll-off container comingling with stormwaters in an area that has potential to discharge to surface waters and waste metal in a roll-off container not covered. At the company’s Franklin plant, the inspector observed waste roll-off containers not under cover and/or fully under cover and not sealed, and industrial equipment not in use not fully under cover and corroding.

Based on the conditions of the company’s plants during the inspection, the plants would not qualify for a Conditional Exclusion for “no exposure” under 40 C.F.R. §122.26(g). You must immediately ensure that all industrial materials and activities are protected by a storm-resistant shelter to prevent exposure to rain, snow, snowmelt and/or runoff. Please provide photo documentation to Mr. Canzano if you believe you have taken steps to qualify for the Conditional Exclusion for “no exposure.” If such site conditions cannot be achieved at each plant, you must begin the process of developing a Stormwater Pollution Prevention Plan (“SWPPP”) and submit a

Notice of Intent (“NOI”) for coverage under EPA’s NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (“MSGP”).

The Oil Pollution Prevention Regulations (40 C.F.R Part 112) may also be applicable to your plants. The inspector was informed by facility personnel that neither plant has an oil Spill Prevention Control and Countermeasure (“SPCC”) plan but that one may need to be developed. The inspector recommends the company consult a professional engineer to evaluate each plant’s applicability under the regulations.

Process wastewaters from the company’s Northfield plant from metal mold and casting operations may be above federal standards for oil and grease and total copper. The company is mathematically averaging, on a quarterly basis, flow and production rate data when calculating equivalent concentration-based limits. This method is not consistent with EPA guidance¹. EPA guidance shows variability analysis yields a determination of the achievable maximum daily, or maximum monthly average, concentration, or mass per day. This is then combined with the “long-term” average production and flow rates to yield a production-based standard. The Northfield plant’s wastewaters may be in violation of categorical pretreatment standards at 40 C.F.R. § 464.15(f).

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,

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Denny Dart, Branch Manager
Enforcement & Compliance Assurance Branch

Enclosures: (electronic)
Images and Pictures

¹ Guidance Manual for the Use of Production-Based Pretreatment Standards and Combined Wastestream Formula, September 1985, and Metal Molding and Casting Development Document, October 1985.