



REGION 1

NEW ENGLAND REGIONAL LABORATORY
NORTH CHELMSFORD, MA 01863

Date: 4/17/2024

Subject: Inspection Report
Compliance Sampling Inspection
Tender Corporation d/b/a Adventure Ready Brands™

From: William Sommer, Inspector
Field Services Branch (FSB)
Laboratory Services and Applied Science Division (LSASD)

WILLIAM SOMMER

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Date: 2024.04.17 08:52:45 -04'00'

Anna Hatke, Life Scientist
LSASD-FSB

**ANNA
HATKE**

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Reviewed By: Jerome Keefe, Field Team Leader
LSASD-FSB

JEROME KEEFE

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To: Newton Tedder, Acting Manager
Water Compliance Section 1
Enforcement and Compliance Assurance Division (ECAD)

CC: Damian Bednarz, Inspector
ECAD-EWC

I. Facility Information

- A. Facility Name: Tender Corporation d/b/a Adventure Ready Brands™
- B. Facility Location: 944 Industrial Park Road, Littleton, NH 03561
- C. Facility Contact(s): John Gaulin, Chief Operating Officer
jgaulin@adventurereadybrands.com (800) 258- 4696,
Patience Marsh, QAIRA Manager,
Anastasia Keats, QC Manager
- D. National Pollutant Discharge Elimination System ("NPDES") ID Number: NHPIU0014

II. Background Information

- A. Date and time of inspection: 2/21/2024
Facility entrance: 13:00

Facility exit: 15:41

- B. Weather Conditions: 34 °F, sunny, with little cloud cover*
- C. US EPA Representative(s): William Sommer, Nafisah Ali, Ryan Leo, Anna Hatke*
- D. State/Local Representative(s): Doug Damko, Director of Public Works , The Town of Littleton POTW) ddamko@townoflittleton.org, Eric Oliver, Public Works Pre-Treatment Coordinator, The Town of Littleton POTW eoliver@townoflittleton.org*
- E. Federally Enforceable Requirements Covered During the Inspection: 40 C.F.R. Part 403, General Pretreatment Regulations, 40 CFR Part 439.27- Pharmaceutical Manufacturing Point Source Category Subpart B-Extraction Products 40 C.F.R. Part 455.47- Pesticide Chemicals Formulating and Packaging Regulations*
- F. Previous Enforcement Actions: Administrative- Formal
Docket Number: CWA-AO-R01-FY20-29
Enforcement Type: CWA 309A AO For Compliance*

III. Disclaimer

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.

IV. Type and Purpose of Inspection

US EPA Region 1 representatives William Sommer, Nafisah Ali, Anna Hatke, Ryan Leo, and Damian Bednarz (the "EPA Inspection Team") conducted an announced NPDES Industrial User ("IU") pretreatment sampling inspection at Tender Corporation d/b/a Adventure Ready Brands™, a privately-owned industrial facility ("the facility"), located in Littleton, NH.

The purpose of this inspection was to collect representative effluent wastewater samples and assess the facility's compliance with the EPA general pretreatment regulations in 40 CFR 403, the applicable EPA categorical pretreatment standards in 40 CFR 439.27 and 40 C.F.R. Part 455.47, and applicable provisions including but not limited to industrial local limits in the facility's industrial discharge permit (IDP) issued by the Town of Littleton, NH.

V. Facility Description

According to the facility's website, Tender Corporation d/b/a Adventure Ready Brands was established in 1975. The facility manufactures pharmaceutical and pesticide products for

external or internal human consumption, primarily in the form of ampoules, tablets, capsules, vials, ointments, medicinal powders, solutions, and suspensions. Specific brands and products produced by this facility include After Bite®, Ben's® and Natrapel® insect repellent, first aid kits from Adventure Medical Kits®, Easy Care First Aid™, survival products from Survive Outdoors Longer®, RapidPure® outdoor water purifiers, bear spray from Counter Assault®, and newly acquired LuminAID® that provides solar powered lanterns.

According to a prior facility inspection report, one discharge point is present in the facility, "Outfall 1", which discharges to the Littleton Publicly Owned Treatment Works ("POTW") (NPDES Permit No. NH0100153). Two processing lines are present at the facility, one pharmaceutical processing line and one pesticides processing line. "Outfall 1" is located at the end of the pharmaceutical processing line. According to John Gaulin, Chief Operating Officer of the facility, there is no discharge from the pesticide processing line to Littleton POTW. The facility's Significant Industrial User ("SIC") Codes are 2834 (Pharmaceutical Preparations), and 2879 (Pesticides and Agricultural Chemicals, Not Elsewhere Classified).

VI. Inspection

On 2/6/2024 Damian Bednarz announced the inspection to the facility. On 2/21/24 the EPA Inspection Team entered the facility at approximately 13:00.

VI.A. Opening Conference

At 13:10, the EPA Inspection Team held an opening conference with Doug Damko and Eric Oliver from the Town of Littleton POTW (the "Local Representatives"), and facility representatives John Gaulin, Patience Marsh, and Anastasia Keats (the "Facility Representatives"). Mr. Sommer and Mr. Bednarz presented credentials to the facility and Local Representatives. Mr. Sommer explained the purpose of the wastewater sampling inspection.

Mr. Gaulin explained that Tender Corporation d/b/a Adventure Ready Brands™ employs 78 full-time employees and 2 part-time employees in manufacturing. The facility has two ten-hour operating shifts on Monday through Thursday.

Mr. Gaulin explained that the facility has an automated wastewater pretreatment system that batch discharges to the Littleton POTW. Wastewater sent to the pretreatment system is generated from the facility's pharmaceutical processing line. The pesticide processing line present at the facility does not discharge to the facility's pretreatment system and does not discharge to the POTW. All floor drains present in the pesticide process line room are plugged. Mr. Gaulin explained that in the past, Veolia, a third-party contractor, was hired for wastewater removal from the facility's pesticide processing line. Mr. Gaulin explained the facility recycles rinsate through the facility pesticide processing line and removal is no longer necessary. Veolia is now utilized for disposal of expired key product returns.

Mr. Gaulin explained that in November through December of 2022, the facility underwent renovations. A new dividing wall was installed between the pharmaceutical process line and the pretreatment room. This addition was included in the updated facility schematic.

Mr. Gaulin explained two emergency stop buttons were installed, one of which is located at the automatic sump pump in the pharmaceutical pretreatment room. Ms. Ali asked if the addition of the emergency stop buttons were included in the updated facility schematic. Mr. Gaulin explained they were not included on the updated facility schematic. Ms. Ali asked if "Outfall 1" is labeled on the updated facility schematic. Mr. Gaulin explained that "Outfall 1" is not labeled on the updated facility schematic.

Ms. Hatke asked if emergency shutoff valves are present at the facility. Ms. Marsh explained that the facility requires employees to attend training for use of facility shut off valves upon hiring and during document changes.

Mr. Gaulin explained grab samples are collected from "Outfall 1" by facility personnel once a week for pH measurements.

Mr. Bednarz explained, upon review of facility records, that the facility reported weekly and monthly averages for pH and monthly averages for flow. He explained that there was one periodic report for compliance ("PRC") that did not have discharge representative pH data, and that flow is typically reported as one representative month of flow out of the 6-month operational duration of the PRC.

Mr. Gaulin explained the facility uses Chemserve, a contract laboratory, for facility sample analysis. Samples collected by facility personnel are sent to Chemserve within 24 hours of collection.

The Facility Representatives announced that the wastewater pretreatment system would not be discharging during the sampling. The Facility Representatives explained sanitized water would have to be fed into the wastewater pretreatment system to generate effluent.

Mr. Sommer asked if the facility wanted split samples. Mr. Gaulin declined.

VI.B. Plant Inspection

At 14:04, the Local Representatives departed the facility for the day. The Facility Representatives lead the EPA Inspection Team to the personal protective equipment outfitting room and the EPA Inspection Team donned Tyvek suits, gloves, safety glasses and hair nets. The EPA Inspection Team, except for Mr. Bednarz, and the Facility Representatives, except for Mr. Gaulin, walked to the facility pretreatment system. Mr. Gaulin and Mr. Bednarz agreed to conduct an inspection of the remainder of the footprint of the Facility while sampling was conducted in the pretreatment room.

At the pretreatment system, the EPA Inspection Team observed the emergency stop for the automatic sump-pump (Photo 1) and the 300 and 1,000-gallon pharmaceutical mix tanks. The EPA Inspection Team observed two floor drains, one on the upper level, and one on the lower level beneath the tanks, both of which lead to the sump. Ms. Marsh and Ms. Keats showed the EPA Inspection Team the pH neutralization unit which is attached to the sump. They explained that a digital meter attached to the pretreatment system depicts flow and pH. The station also has a paper flow meter attached to the pretreatment system (Photo 2). The EPA Inspection Team observed a valve, labeled “Outfall 1”, where Mr. Gaulin said the facility samples treated wastewater is sampled (Photo 4).

The EPA Inspection Team began sampling set up at approximately 14:34 at “Outfall 1”. To trigger the batch discharge from the pretreatment system Ms. Marsh fed a sanitized water line hose to a port in the “wastewater” pipeline (Photo 3). Samples were collected from the “Outfall 1” valve on the “Treated Water” pipeline. Prior to sample collection, the valve was opened and allowed to run for proximately 30 seconds into a catch bucket to purge the line. Grab and duplicate sample collection occurred at 15:00. Details of the sampling event can be found in Section VII: “Wastewater Sampling”.

The EPA Inspection Team rejoined Mr. Gaulin and Mr. Bednarz in front of a packaging room after completion of the sampling event.

VI.C. Closing Conference

At approximately 15:20, the EPA Inspection Team and Facility Representatives reconvened for the closing conference.

Mr. Bednarz stated he witnessed a spill during his tour of the pesticide process line, due to the overfilling of a mixing tank. Mr. Gaulin stated that the material from the spill clean-up will be stored in 55-gallon drums, as well as the mop heads used to clean up the spill. Ms. Marsh stated that an email would be sent to Mr. Bednarz outlining the volume of water used to wash out tanks in the pesticide process room.

Mr. Bednarz reiterated that pH and flow data ought to be representative of every instance where discharge is occurring to the POTW.

Ms. Ali and Mr. Sommer requested an updated schematic from the facility to include e-stops, drains, and “Outfall 1”.

The EPA Inspection Team departed at 15:41.

VII. Wastewater Sampling

The sampling activities were conducted in accordance with the FSB Standard Operating Procedure (SOP) for Collection of NPDES Water and Wastewater Samples contained in FSB SOP-NPDESWATERSOP, Revision 2, 2020, and the signed Sampling and Analysis Plan (SAP).

Mr. Sommer, Ms. Ali, and Mr. Leo collected all the samples described below. Grab samples (“Tender-01”) were collected from Outfall 1 valve on the “Treated Water” pipeline for the analysis of Volatile Organic Analytes (VOAs), acetone and methylene chloride. A field duplicate sample (“DUP-01”) was collected for each analysis during the sampling inspection. An instantaneous grab sample was collected for the in-situ measurement of pH and Total Residual Chlorine (“TRC”). The sample was field tested for pH using an Oakton “pH tester” pH meter. The pH reading was 8.44 S.U. The pH meter was calibrated prior to the inspection by Ms. Hatke on 2/20/24, using National Institute of Standards and Technology traceable standards.

TRC was analyzed in the field using a HACH “DR300” colorimeter by Ms. Ali. The TRC reading was 0.00 mg/L. The Hach DR300 colorimeter was verified according to manufacturer specifications, prior to the inspection using SpecCheck DPD chlorine standards by Ms. Hatke on 2/20/2024.

The VOA samples were collected in 40-mL amber vials and preserved with hydrochloric acid to attain a pH of less than 2 S.U. After collection, all samples were placed in coolers with ice to maintain an internal temperature of less than 4 degrees Celsius and delivered to the EPA New England Regional Laboratory in North Chelmsford, MA to be analyzed.

VIII. EPA Sampling and Analytical Results

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, Attachment A.

Table 1: Summary of Field Parameters and Laboratory Analytical Results for Inspection of Tender Corporation d/b/a Adventure Ready Brands™ on February 21, 2024

Sample #	Sample Date and Time	Sample Type	pH (S.U.)	TRC (mg/L)	EPA Analytical Results (mg/L unless otherwise noted)		Pretreatment Standards for 40 CFR Part 439.27	
							Daily Maximum (mg/L)	Monthly Average (mg/L)
Tender-01	2/21/24 15:00	Grab	8.44	0.00	VOCs acetone	0.011	20.7	8.2
					VOCs methylene chloride	ND (<.001) ¹	3.0	0.7

DUP-01	2/21/24 15:00	Dup. of Grab	N/A	N/A	VOCs acetone	0.012	20.7	8.2
					VOCs methylene chloride	ND (<.001) ¹	3.0	0.7

Footnotes:

1. Reporting Level

Compounds that were analyzed but not listed in Table 1 are Not Detected above Reporting Limit (ND). The trip blanks were prepared prior to the mobilization.

IX. Appendices

A: Photos



Photo 1: Emergency shut off button located in the facility's pretreatment room.

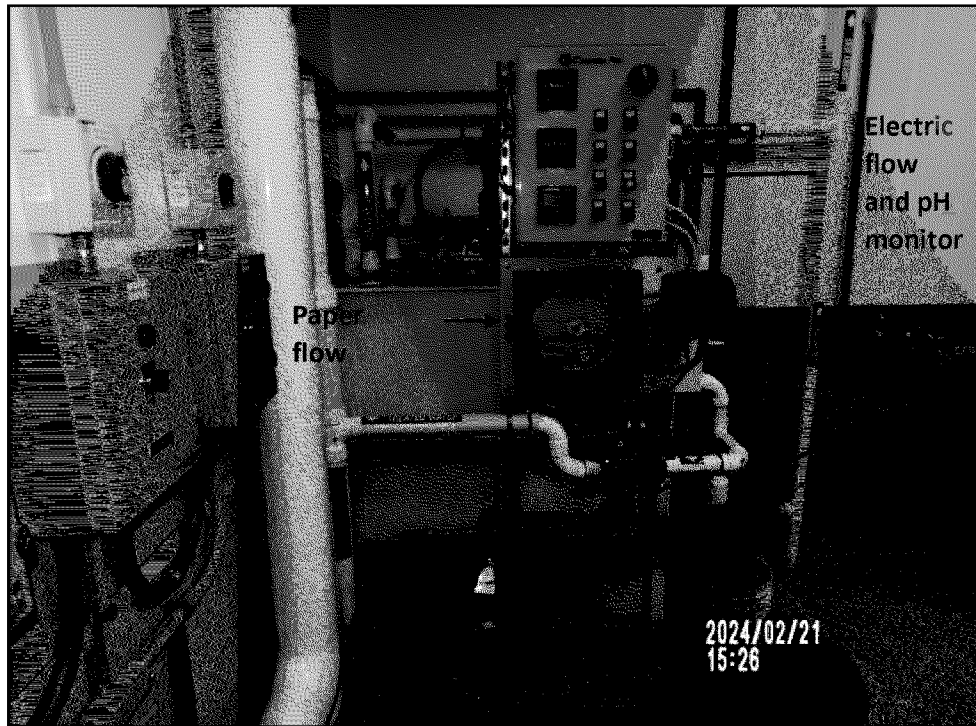


Photo 2. Facility's pretreatment system with paper flow monitor, and electronic flow and pH monitor. The categorical sampling location for "Outfall 1" is located on the bottom right above the catch bucket.



Photo 3. The port where the sanitized water hose was connected to is located on the right-hand side, on the “Wastewater” pipe. The categorical sampling location for “Outfall 1” is located on the left over the catch bucket.

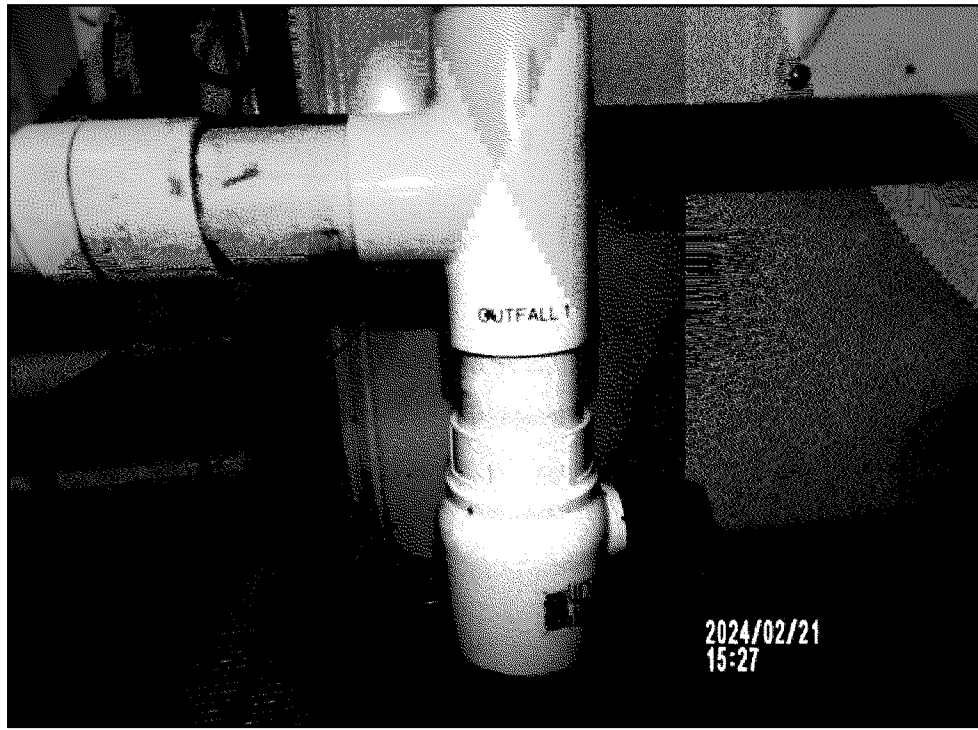


Photo 4. The categorical sampling location for “Outfall 1” which is connected to the “treated Water” line and from where sampling occurs.

B. Laboratory Analysis

End of Report