



REGION 2

NEW YORK, N.Y. 10007

12/2/2024

Via Certified Mail or UPS Mail

And Email - bpeyatt@brunnerbrakes-intl.com

Brian Peyatt, Plant Manager
Brunner International, Inc.
3959 Bates Road
Medina, New York 14103

Re: **Request for Information**
Brunner International, Inc.
Docket No. CWA-IR-25-005
EPA Compliance Evaluation Inspection, September 18, 2024
Industrial User of Medina and MSGP
MSGP Permit ID NO NY00B930 and IU ICIS No. NYP081240

Dear Mr. Peyatt:

The purpose of this Request for Information ("RFI") letter is to require you to submit information to the U.S. Environmental Protection Agency ("EPA") regarding the Brunner International, Inc. 3959 Bates Road, Medina New York Facility ("Site" or "Facility"). Representatives of the United States Environmental Protection Agency ("EPA") Region 2, and the Village of Medina, conducted a Compliance Evaluation Inspection ("CEI" or "Inspection") at this braking systems manufacturing Facility on September 18, 2024. The purpose of the CEI was to determine the Facility's compliance status with Section 301, 307 and 402 of the Clean Water Act related to discharges of stormwater associated with industrial activity to tributaries of the Erie Canal and its industrial user (pretreatment) discharge to the Village of Medina WWTP

The Facility discharges its process wastewater to a Village of Medina Sewer System which transmits the wastewater to the Village of Medina Wastewater Treatment Plant (WWTP). The Medina WWTP discharges under treated wastewater to Oak Orchard Creek under SPDES Permit No. NY0021873. Oak Orchard Creek is a tributary of Lake Ontario, which are all Navigable Waters of the U.S. Brunner is an Indirect Discharger or Industrial User of the Village of Medina WWTP. Brunner's metal finishing process wastewater discharges are subject to the provisions in Section 307 of the CWA and 40 CFR Part 403 and 433 as applicable.

The Facility also has coverage under the New York State Department of Environmental Conservation's

(NYSDECs) SPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity ("MSGP" or "Stormwater Permit") for stormwater discharges to tributaries of Erie Canal and SPDES MSGP ID No NY00B930

Section 308(a) of the Clean Water Act ("CWA"), 33 U.S.C. §1318(a), provides that whenever it is necessary to carry out the objectives of the CWA, including determining whether or not a person/agency 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 Clean Water Act, EPA may require the submission of information necessary to assess the compliance status of any facility and its related appurtenances. Failure to respond properly to a Request for Information may subject the Owner/Operator to enforcement subject to Section 309 of the CWA 33 U.S.C. §1319.

REQUEST FOR INFORMATION

Brunner International, Inc. ("Respondent") is hereby required, pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. §1318(a), to submit the following information regarding the subject site.

1. Within forty-five (45) calendar days of receipt of this RFI submit:

- a. A written response to the CEI Report with the actions (including a schedule) that are being taken or will be taken to address each of the Potential Non-Compliance Items and Areas of Concern (items that should be improved or addressed for better operations of the facility) identified in the attached inspection report, if not already addressed in the responses above;
- b. The approximate daily flow volume of Reverse Osmosis ("R.O") reject water (identified on the flow map as R.O. concentrate) that is discharged to the wastewater treatment tank/wastewater monitoring tank. The flow diagram identifies that there is a flow of 4 gpm when the R.O. unit is operating. Approximately how often (e.g how many hours per day, how many days per week, etc.)? The approximate percentage of the total discharge to the wastewater monitoring tank that is R.O. reject water.
- c. Representative Monitoring results of the R.O reject water on two separate days. Take grab samples of the R.O. reject water and analyze it for the same parameters required at the Industrial User Outfall required by 40 CFR 433.17, without total toxic organics. Take grab samples for Total Cadmium, Chromium, Copper, Lead, Nickel, Silver, Cyanide. All monitoring shall be conducted in accordance with 40 CFR Part 136.

CERTIFICATION

Any documents to be submitted as part of this Request for Information 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 submitting false information, including the possibility of fine and imprisonment for knowing violations."

All information required to be submitted pursuant to this Request for Information shall be **sent by email** to the following (if unable to make electronic submittals mailing addresses are listed below):

Larry Gaugler, P.E, Team Leader
Small Clean Water Programs Team, Water Compliance Branch
Enforcement and Compliance Assurance Division
EPA – Region 2
gaugler.larry@epa.gov

Mikhail Mohammed
Water Compliance Branch Enforcement and Compliance Assurance Division
EPA - Region 2
mohammed.mikhail@epa.gov

Murray Lantner, P.E., Environmental Engineer
Water Compliance Branch Enforcement and Compliance Assurance Division
EPA - Region 2
Lantner.Murray@epa.gov

New York State Department of Environmental Conservation, Region 9
Damianos Skaros, P.E. Regional Water Engineer
damianos.skaros@dec.ny.gov

Should you have any questions regarding this request, feel free to contact Larry Gaugler, P.E., Team Leader at (212) 637-3950 or Murray Lantner, P.E. Environmental Engineer (212) 637-3976.

Sincerely,



Digitally signed by JUSTINE
MODIGLIANI
Date: 2024.12.02 11:10:24 -05'00'

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

Enclosure

Compliance Evaluation Inspection Report from September 18, 2024, Inspection

cc: Ed Hampston, P.E., Director, Bureau of Water Compliance Programs, NYSDE
Jason Watts, Superintendent Public Works, Village of Medina, jwatts@villagemedina.org

