REGION 1

BOSTON, MA 02109

Date: *Dated as shown on electronic signature(s)*

Subj: Inspection Report – Clean Water Act ("CWA")
National Pollutant Discharge Elimination System ("NPDES")

From: Margarita Chatterton, EPA Inspector MARGARITA CHATTERTON Digitally signed by MARGARITA CHATTERTON Date: 2025.01.17 14:30:15 -05'00'

Thru: Damian Bednarz, EPA Inspector

To: File

I. Facility Information

A. *Facility Name:* North Grafton Washington Mills, Inc.

B. *Facility Location*: 19 Mill Street
North Grafton, MA 01536

C. *Facility Contacts:* Steve Schmitt – Plant Manager,
John Winkler - Vice-President,
Roberto Delatorre – EHS Coordinator,
Jim Barker – EHS Consultant
20 North Main Street
North Grafton, MA 01536

D. *ID No(s).:* MAR05J03K

II. Background Information

A. *Date(s) of inspection:* 11/21/2024

B. *Weather Conditions:* Rainy, approximately 44° F (Worcester, MA, Regional Airport)

C. *US EPA Representative(s):* Margarita Chatterton, Damian Bednarz, Elliot Anderson, Enforcement & Compliance Assurance Division (ECAD)

D. *State/Local Representative(s): NA*

E. *Federally Enforceable Requirements Covered During the Inspection:*
40 C.F.R. Part 122.26, National Pollutant Discharge Elimination System ("NPDES") Multi-Sector General Permit ("MSGP") for Stormwater Discharges Associated with Industrial Activities

F. *Previous Enforcement Actions:*
None at the time of the inspection

III. Type and Purpose of Inspection

EPA Inspectors Damian Bednarz, Margarita Chatterton and Elliot Anderson conducted an announced inspection at Washington Mills, hereafter referred to as "the facility" and/or "WM". The purpose of the site inspection was to evaluate the Facility's industrial operations and activities exposed to precipitation that produce a discharge to surface waters and compliance with the requirements of EPA's 2021 Multi-Sector General Permit (MSGP).

IV. Facility Description

Washington Mills, Inc. ("WM") is an abrasive manufacturer that has operated in the US since 1868. WM's website indicates it produces a multitude of abrasive products to be sold to customers for an array of end-use applications including but not limited to polishes, coatings, and grinding and blasting media. Products are defined by mineral and chemical compositions as well as particle or grit sizes. According to facility representatives and the February 2021 facility's SWPPP, WM conducts operations at two separate locations in North Grafton, where abrasive materials are manufactured and packaged. These activities are associated with Standard Industrial Classification (SIC) Code 3291, which is part of Sector E, Sub-Sector E3 of the MSGP. The Facility, also referred to as "Plant 2", is located at 19 Mill Street, Grafton Massachusetts (Photo 1) and is authorized to discharge stormwater associated with industrial activity to the Quinsigamond River under the MSGP (Permit ID MAR05J03K). Plant 2 is primarily engaged in the re-packaging and shipping of abrasive final product, outdoors storage of equipment and indoor maintenance of 2 loaders and machinery.

V. Inspection

EPA inspectors arrived at approximately 9:00 a.m.

A. Opening Conference and Site Walk

After meeting at the Plant 1 location, EPA Inspectors and Roberto De La Torre, Steven Schmitt, John Winkler, and Jim Barker ("Facility Representatives") held an opening conference at the Facility's administration building at approximately 9:30 a.m. EPA inspectors presented credentials, provided a copy of the Small Business Resources Information Sheet, and explained the purpose of the inspection.

Facility representatives described the industrial operations at the North Grafton facilities as follows: "raw materials (e.g., bauxite) shipped from Canada, are delivered daily to the 20 North

Main Street ("Plant 1") location via truck or rail. Raw materials are crushed, sorted by size (some of the abrasive is coated with red iron-based material to improve toughness) and packaged into 2,000 lb bags." WM representatives described the 19 Mill Street ("Plant 2") operations as "primarily engaged in the re-packaging of the abrasive materials produced Plant 1), into 25 and 50-lb bags and limited maintenance of 2 front-end loaders and indoors fabrication, and cleaning and storage of equipment and machinery." Facility representatives indicated that maintenance of vehicles is limited to indoors routine maintenance, repairing and fueling of 2 front loaders and that there is no washing of vehicles occurring on-site.

WM representatives indicated that Plant 1 and Plant 2 have a combined total of about 55 employees, working 5am-3pm, 7am-3pm and 3pm-1am shifts covering production, receiving and shipping of raw materials and products, and maintenance. In addition, there are about 20 employees handling the administrative portion of the business.

Following the opening conference a site walk of Plant 1 was started at around 10:15 am, information on the site walk for Plant 1 can be found in a separate inspection report (see 11/21/2024 inspection report for Washington Mills, 20 North Main Street, North Grafton).

After a lunch break WM representatives met EPA inspectors at the Plant 1 office, at around 1:10 pm WM staff accompanied the EPA inspectors to the 19 Mill Street WM location. Inspectors observed that the Plant 2 is located on a South facing slope that abuts the Quinsigamond River to the South. As the group entered this location Mr. De La Torre explained that an area on the northeastern portion of Plant 2 was leased and used for school bus storage (Photo 2).

The Notice of Intent (NOI) for 19 Mill Street identifies four (4) Outfalls 005, 006, 007 and 008, at Plant 2 (Photo 1), the facility's SWPPP map shows an additional outfall 004. The SWPPP shows these outfalls as located on the southern portion of the facility and discharging directly to the Quinsigamond River.

Upon entering Plant 2 the team proceeded to outfall locations 004 and 005. EPA inspectors observed a covered delivery bay (Photo 5) in the building nearest to outfall 005, no floor drains were observed within the bay. I observed that stormwater discharges for outfalls 004, 005 and 006 originate from overland runoff from nearby paved areas that concentrates at the points were these outfalls are located (Photos 4, 6A, 6B, 8). Inspector Elliot Anderson observed bricks that were stored and/or discarded on the stream bank (Photo 7).

EPA inspectors observed corrugated white pipes along the stream bank of the Quinsigamond River which Mr. De La Torre identified as outfalls 007 and 008, outfalls 007 (Photos 9A, 9B and 9C) and 008 Photos (10A, 10B and 10C) each appeared to be aligned and connected to two upgradient catch basins situated on either side of facility road nearest to the river. EPA Inspectors did not observe catch basins or other stormwater infrastructure on the vicinity of the buildings located on the Northern half of the facility that may potentially discharge to outfalls 005 through 008.

Additionally, EPA Inspectors observed the following areas at Plant 2:

- Various outdoor storage and equipment staging areas (Photo 1).

- Western most area - pallets, an uncovered dumpster full of empty drums, and old machinery parts (Photos 11 and 12).
- Across access road, West of Building E – sand storage shed, empty 55-gallon drums, metal pipes and beams (Photos 13A and 13B).
- Area located between truck shop and maintenance shop (Photo 17).

EPA Inspectors observed particulate/soil accumulated on pavement on the vicinity of the warehouse, truck shop and maintenance shop (Photo 14). During the site walk of Plant 1 I asked Mr. Winkler about sweeping practices being implemented and the frequency and he responded that sweeping is primarily limited to indoors.

Mr. De La Torre told EPA inspectors that building 2B is used for warehousing of products by multiple companies. He indicated that the maintenance of 2 front loaders and equipment fabrication, as well as cleaning and storage operations, are implemented indoors in the maintenance buildings. WM representatives led EPA inspectors inside the truck and maintenance shops. I observed a drain grate in proximity to a front-end loader in the maintenance garage (Photo 15). Beside the loader was a 275-gallon diesel tank utilized for fueling of equipment (Photo 16). The volume of this tank is an estimation given by Facility Representatives. When asked about the floor drain, WM representatives stated that they did not know if the structure was a dry well or was connected to stormwater infrastructure or sewers. EPA inspectors observed indoor storage of various chemicals and drums with hazardous waste labelling (Photos 18A, 18B, 18C, 18D, 19A, 19B), and a bucket marked sump pump kit. When asked if they had a sump pump, WM representatives indicated that a sump pump serviced the elevator shaft in the 2A East building, WM representatives did not know where the pumped water was discharged to.

B. Records Review

Notice of Intent for NPDES Permit: MAR05J03K

Stormwater Pollution Prevention Plan – Facility representatives submitted the Storm Water Pollution Prevention Plan ("SWPPP") that included Plant 1 and Plant 2 and underground connections report conducted by GPRS, dated February 2021, by email to EPA Inspectors on December 18, 2024. I reviewed and referenced these materials in the writing of this report.

C. Closing Conference

After completing the site walk of Plant 2, EPA Inspectors and Facility Representatives returned to the conference room to conduct the closing conference. EPA Inspectors discussed the following areas of concern with WM representatives:

- General conditions at the Facility indicate that the transfer and storage of materials should be managed more effectively such that materials do not escape their intended destinations and become exposed to stormwater.
- Inspector Damian requested that the Facility submit to him, by email, their SWPPP and any information regarding stormwater conveyance piping, tie-ins, and an illicit discharge study. Inspector Damian explained that it should be known where indoor drains lead to.

- The Facility, at the time of the inspection, is in SNC because of a missing DMR.
- Per MSGP requirements, dumpsters should remain closed when not in use. Discharges from exposed dumpsters and roll-offs are not authorized by the MSGP.
- Considering a recent change of organization at WM, and a resulting unfamiliarity with on-site stormwater management, the Facility should become familiar with how stormwater interacts with the property and conduct regular training to its staff.
- Sweeping is not to be limited to indoor areas, sweeping of outdoor areas must be implemented to control the discharge of particulate matter.
- EPA Inspectors observed a floor drain in a maintenance building at Plant 2. It's function and connection should be investigated.
- Regarding the elevator sump pump, investigate the frequency of discharge and communicate how waters are disposed of when pumped.

EPA inspectors departed at approximately 2:30 p.m.

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.