



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Sent via Electronic Mail (*Dated as shown on electronic signature*)

Michael Nuzzolilo
Culpeper Wood Preservers
840 Sterling Road
Lancaster, MA 01523
mnuzzolilo@culpeperwood.com

and

Chris Doucette, Plant Manager
Culpeper of Belchertown, LLC
201 Springfield Road
Belchertown, MA 01007
cdoucette@culpeperwood.com

Subject: November 2nd and 3rd, 2022, EPA Inspections

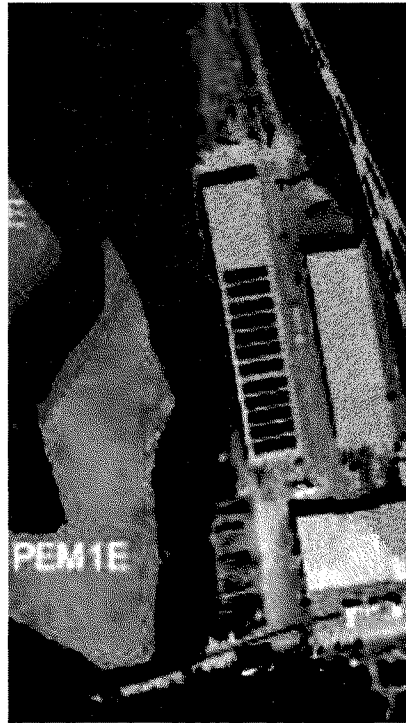
Dear Mr. Doucette and Mr. Nuzzolilo:

On November 2nd and 3rd, 2022, respectively, the U.S. Environmental Protection Agency ("EPA") performed inspections at Culpeper Wood Preservers located at 840 Sterling Road in Lancaster, MA ("Lancaster Facility") and Culpeper of Belchertown, LLC located at 201 Springfield Road in Belchertown, MA ("Belchertown Facility") (collectively "sites" or "Facilities") regarding compliance with the National Pollutant Discharge Elimination System program of the Clean Water Act. A copy of the inspection reports and associated documents are included as attachments to this letter.

1. Specific comments, informed by the inspections, are as follows:
2. Facility representatives at the Lancaster Facility stated that the locations for Outfalls 001 and 002 depicted on the site map were inaccurate. Provide an updated Stormwater Pollution Prevention Plan ("SWPPP") map with the correct locations for Outfalls 001 and 002.
3. On page 2-7 of the Lancaster Facility's SWPPP, it states incorrectly that "under the multi-sector general permit, Culpeper is required to sample stormwater discharges (outfalls) twice per year of their permit." This statement should be corrected to be consistent with the requirements of Section 4.2.2 of the Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity ("MSGP") which requires quarterly benchmark monitoring.
4. At the Belchertown Facility, representatives stated treated lumber sits for up to a year outdoors before it is shipped out. The Facility representatives also stated that raw and dried, treated wood is occasionally pressure washed with water to remove decaying

material and dirt as needed. Please note that process wastewater is not authorized to be discharged under the MSGP.

5. Draw the outline of the northwestern and southwestern detention pond as well as the flow path between the two ponds on the image below (which portrays nationally defined wetlands).



6. The Facilities have both triggered Additional Implementation Measure (“AIM”) requirements:
 - The Lancaster Facility’s 2021 Annual Report states pollution control measures would begin to be implemented in the spring of 2022. During the inspection, representative stated that to address copper exceedances, the Facility has begun coordinating response plans with both Irwin Engineer and GZA GeoEnvironmental, Inc. Additionally, page 4-12 of the facility’s SWPPP states that “it is aggregating past data.”

Submit a narrative description of all AIM responses taken to date and an implementation schedule for any future AIM responses at both Facilities. Include the past sample data aggregation as part of the Lancaster Facility description.

Please provide a response to these comments in an electronic format to me at the following address: Rosenberg.alex@epa.gov within 30 calendar days from receiving this letter.

Legal issues may be directed to Sam Horowitz, Enforcement Counsel, at (617) 918-1512.

Sincerely,



Digitally signed by
ALEX ROSENBERG
Date: 2022.12.21
14:53:06 -05'00'

Alex Rosenberg, Water Compliance Section Inspector
Enforcement and Compliance Assurance Division

Enclosures:

Inspection Report November 2, 2022 + Photo Album
Inspection Report November 3, 2022 + Photo Album

CCs (electronic only):

Joshua J. Adkins, EHS Director, Culpeper Wood Preservers
Susannah King, MASS DEP
David Boyer, MASS DEP
Giles Perkins, MASS DEP
Sam Horowitz, Counsel, US EPA