



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100 (OESO4-4)
BOSTON, MASSACHUSETTS 02109-3912

APR - 5 2011

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Betty and Gary Grimmel, Owners
Grimmel Industries, L.L.C.
80 Pejepscot Village
Topsham, Maine 04086-6194

Re: In the Matter of Grimmel Industries, Administrative Order Docket No. 011-002

Dear Mr. and Ms. Grimmel:

Enclosed is an Administrative Order ("Order") issued by the U.S. Environmental Protection Agency ("EPA") pursuant to Sections 308(a) and 309(a)(3) of the Clean Water Act, as amended (the "Act"), 33 U.S.C. §§ 1318(a) and 1319(a)(3). The Order requires Grimmel Industries, L.L.C. ("Grimmel") to stop discharges resulting from spraying scrap metal piles with water for dust suppression purposes. The Order requires Grimmel Industries to submit an engineering plan to eliminate mercury and PCB discharges to the Piscataqua River and to meet the effluent limits of the 2008 Multi Sector General Permit ("MSGP"). The Order also requires Grimmel Industries to comply with the inspection and sampling requirements in the MSGP and to submit certain information to EPA.

Enclosed with this Order is an information sheet intended to assist small businesses, as defined by the Small Business Administration (SBA) at 13 C.F.R. Part 121.201, in understanding and complying with environmental regulations.

If you have any technical questions regarding this letter, you may contact Denny Dart, of my staff, at (617) 918-1850. For legal matters please have your attorney contact Kathleen Woodward, of my staff, at (617) 918-1780.

Sincerely,

Susan Studlien

Susan Studlien, Director
Office of Environmental Stewardship

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

IN THE MATTER OF:)	DOCKET NO. 11-002
)	
)	FINDINGS OF VIOLATION
Grimmel Industries, L.L.C.)	
)	AND
Proceedings under Sections 308(a) and)	
309(a)(3) of the Clean Water Act,)	ORDER FOR COMPLIANCE
as amended, 33 U.S.C. §§ 1318(a) and)	
1319(a)(3))	

I. STATUTORY AUTHORITY

The following Findings are made and ORDER issued pursuant to Sections 308(a) and 309(a)(3) of the Clean Water Act, as amended (the "Act"), 33 U.S.C. §§ 1318(a) and 1319(a)(3). Section 309(a)(3) of the Act grants to the Administrator of the U.S. Environmental Protection Agency ("EPA") the authority to issue orders requiring persons to comply with Sections 301, 302, 306, 307, 308, 318 and 405 of the Act and any permit condition or limitation implementing any of such sections in a National Pollutant Discharge Elimination System ("NPDES") permit issued under Section 402 of the Act, 33 U.S.C. §1342. Section 308(a) of the Act, 33 U.S.C. § 1318(a), authorizes EPA to require the submission of any information required to carry out the objectives of the Act. These authorities have been delegated to EPA Region I's Administrator, and in turn to the Director of EPA, Region I's Office of Environmental Stewardship ("Director").

The Order herein is based on findings of violation of Section 301 of the Act, 33 U.S.C. § 1311 and violation of a NPDES permit issued under Section 402 of the Act, 42 U.S.C. § 1342. Pursuant to Section 309(a)(5)(A) of the Act, 33 U.S.C. § 1319(a)(5)(A), the Order provides a schedule for compliance which the Director has determined to be reasonable.

II. DEFINITIONS

Unless otherwise defined herein, terms used in this Order shall have the meaning given to those terms in the Act, 33 U.S.C. § 1251 *et. seq.*, and the regulations promulgated thereunder.

III. FINDINGS

The Director makes the following findings of fact:

Regulatory Framework:

1. Section 301(a) of the Act, 33 U.S.C. § 1311 (a), makes unlawful the discharge of any pollutant by any person from any point source to navigable waters except in compliance with, among other things, the terms and conditions of a NPDES permit issued pursuant to Section 402 of the Act, 33 U.S.C § 1342.
2. Section 502(12) of the Act, 33 U.S.C. § 1362(12) defines the term “discharge of a pollutant” to include “any addition of any pollutant to navigable waters from any point source.”
3. Section 502(5) of the Act, 33 U.S.C. § 1362(5) defines the term “person” to mean “an individual, corporation, partnership, association, State, municipality, commission, or political subdivision of the State, or any interstate body.”
4. Section 502(14) of the Act, 33 U.S.C. § 1362(14) defines the term “point source” as “any discernible, confined and discrete conveyance”
5. Section 502(7) of the Act, 33 U.S.C. § 1362(7) defines the term “navigable waters” as “the waters of the United States, including the territorial seas.”
6. Pursuant to 402(p) of the Act, 33 U.S.C. § 1342(p), discharges of storm water associated with industrial activity must be permitted.
7. Pursuant to Sections 308 and 402(p) of the Act, 33 U.S.C. §§ 1318 and 1342(p), EPA promulgated regulations relating to the control of stormwater at 40 C.F.R. § 122.26.
8. On September 29, 1995, EPA issued the “Final National Pollutant Discharge Elimination System Storm Water Multi-Sector General Permit for Industrial

- Activities" ("1995 MSGP"), which was effective on the date of issuance. 60 Fed. Reg. 50804 (September 29, 1995). The 1995 MSGP covered storm water discharges associated with industrial activities for certain states, including New Hampshire. Facilities requiring coverage under the 1995 MSGP were required to file a Notice of Intent ("NOI") to be covered under the permit by March 29, 1996.
9. On October 30, 2000, EPA re-issued the "Final National Pollutant Discharge Elimination System Stormwater Multi-Sector General Permit for Industrial Activities" ("2000 MSGP") which was effective on the date of issuance. 65 Fed. Reg. 64745 (October 30, 2000).
 10. On September 29, 2008, EPA issued the final 2008 "Final National Pollutant Discharge Elimination System Stormwater Multi-Sector General Permit for Industrial Activities" ("2008 MSGP"). This permit replaces the 2000 MSGP.
 11. Forty C.F.R. § 122.26(b)(14)(vi) defines "stormwater discharge associated with industrial activity" to include facilities classified as Standard Industrial Classification ("SIC") code 5093. SIC code 5093 generally covers "Scrap Recycling Facilities". Grimm Industries' primary SIC code is 5093, Scrap Recycling Facilities, and falls within Sector N, Scrap Recycling Facilities, of the 1995, 2000 and 2008 MSGPs. Part 8, Subpart N, of the 2008 MSGP, "Sector N – Scrap Recycling and Waste Recycling Facilities", provides sector-specific requirements associated with Scrap Recycling and Waste Recycling Facilities. These sector-specific requirements are in addition to any requirements specified elsewhere in the 2008 MSGP.
 12. Section 8.N.6 of the 2008 MSGP sets forth benchmark values of specified pollutants for which permittees must monitor pursuant to Section 6.2.1 of the 2008 MSGP.
 13. Part 2 of the 2008 MSGP, "Control Measures and Effluent Limits," requires that control measures be selected, designed, installed, and implemented to minimize pollutant discharges. Pursuant to Part 2, the term "minimize" in the technology-based limits included in the 2008 Permit "means reduce and/or eliminate to the extent achievable using control measures (including best management practices)

that are technologically available and economically practicable and achievable in light of the best industry practice.”

14. Part 2.1 of the 2008 MSGP, “Control Measures”, provides that the permittee “must select, design, install, and implement control measures (including best management practices) to address the selection and design considerations in Part 2.1.1, meet the non-numeric effluent limits in Part 2.1.2, and meet limits contained in applicable effluent limitations guidelines in Part 2.1.3.”
15. Part 2.1. further provides that “[i]f you find that [the permittee’s] control measures are not achieving their intended effect of minimizing pollutant discharges, [the permittee] must modify these control measures as expeditiously as practicable.”
16. Part 2.2.1 of the 2008 MSGP, “Water Quality Standards,” requires that discharges must be controlled as necessary to meet applicable water quality standards.

Respondent

17. Grimmel Industries, L.L.C. (“Grimmel Industries”) was incorporated in the State of Maine and has its headquarters at 80 Pejepscot Village, Topsham, Maine.
18. Since about February 2002, Grimmel Industries, doing business as Portsmouth Trading, has operated a scrap recycling facility at 555 Market Street in Portsmouth, New Hampshire, on property leased from Pease Development Authority (“Facility”).
19. Grimmel Industries is a “person” as defined in Section 502(5) of the Act, 33 U.S.C. § 1362.

Facility and Operations

20. The Facility is located on a paved 391,700 square foot lot bordered on the east by the Piscataqua River. The site is generally flat with minor slopes for drainage purposes.
21. Stormwater from the site drains generally to the east through regularly spaced catch basins which collect contaminated stormwater and process water and convey these by underground pipe to discharge points into the Piscataqua River.

There are six of these discharge outfalls, referred to as Outfalls 1 through 5 and 10. These discharge outfalls are "point sources" as defined in Section 502(14) of the Act, 33 U.S.C. § 1362(14).

22. Grimmel Industries' industrial operations at the Facility include, but are not limited to, scrap and shredded metal storage piles and pile movement, vehicle maintenance and fueling, and ship loading.

Discharges of Pollutants to Waters of the United States

23. Grimmel Industries discharges stormwater and process waters contaminated with "pollutants", namely, aluminum, copper, iron, lead, mercury, zinc, PCB 1242, chemical oxygen demand, and total suspended solids, as defined in Section 502(6) and (12) of the Act, 33 U.S.C. § 1362 (6) and (12), from point sources, as defined in Section 502(14) of the Act, 33 U.S.C. § 1362(14), into the Piscataqua River.
24. The Piscataqua River flows into the Great Bay which flows into the Atlantic Ocean. All are waters of the United States as defined in 40 C.F.R. § 122.2 and, therefore, are navigable waters under Section 502(7) of the Act, 33 U.S.C. § 1365(7).
25. The Piscataqua River has been identified on the State of New Hampshire's Clean Water Act Section 303(d) impaired waters list as exceeding water quality standards for polychlorinated biphenyls ("PCBs"), mercury, dioxin and pathogens.

Stormwater Discharges

26. Grimmel Industries has conducted "industrial activities" within the meaning of 40 C.F.R. § 122.26(b)(14)(vi) at the Facility since 2002.
27. Since 2002, Grimmel Industries has discharged stormwater from outfalls at the Facility into the Piscataqua River during wet weather events. Monthly monitoring of two of the outfalls discharging from the Facility to the Piscataqua River (Outfalls 2 and 4) was conducted by the McGuire Group, Inc., on behalf of Pease Development Authority. This monitoring revealed that from August 2004 through

at least August 2010, discharges of stormwater from the Facility caused or contributed to an exceedance of numeric Water Quality Criteria for mercury. The monitoring revealed that from August 2004 through at least March of 2010, discharges of stormwater from the Facility caused or contributed to an exceedance of numeric Water Quality Criteria for PCB 1242. The State of New Hampshire Water Quality Criteria are set forth at NH Code of Administrative Rules, Env-Wq 1703.21(b).

28. The monitoring also revealed that from August 2004 through March 2010, discharges of stormwater from the Facility contained aluminum, copper, iron, lead, and zinc in concentrations that exceed numeric Water Quality Criteria for those pollutants as set forth at NH Code of Administrative Rules, Env-Wq 1703.21(b).
29. Since 2004, monthly monitoring of Outfall 2 and Outfall 4 conducted by the McGuire Group, Inc., on behalf of Pease Development Authority, revealed that from August 2004 through November of 2010, discharges exceeded the benchmark standards applicable to Sector N of the 2008 MSGP including benchmark standards for chemical oxygen demand, total suspended solids, aluminum, copper, iron, lead, and zinc.

Process Water Discharges

30. Grimmel Industries sprays scrap metal piles with water to suppress dust. The water becomes contaminated by running through the piles of metal scrap prior to discharge into the Piscataqua River through the catch basins and outfalls. Dust suppression wastewaters are process waste waters.
31. Grimmel Industries does not have authorization under the Act to discharge process wastewaters into the Piscataqua River. Therefore, Grimmel Industries' dust suppression wastewater discharges to the Piscataqua River without permit authorization violated Section 301(a) of the Act, 33 U.S.C. § 1311(a), from the time it began such dust suppression practices to the present.

Discharges of Stormwater without a Permit

32. Stormwater has discharged from the Facility during wet-weather events since February of 2002.
33. Grimmel Industries' stormwater discharges were not covered under a NPDES permit until February 1, 2009.
34. Therefore, Grimmel's stormwater discharges from industrial activities to the Piscataqua River during certain wet-weather events from February of 2002 through January 31 of 2009 were in violation of Section 301(a) of the Act, 33 U.S.C. § 1311(a).

Failure to Comply with the Multisector General Permit

35. Section 5 of the 2008 MSGP requires that permit applicants prepare a Stormwater Pollution Prevention Plan ("SWPPP") before submitting a NOI for permit coverage. The SWPPP is intended to document the selection, design and installation of control measures.
36. Grimmel Industries prepared a SWPPP dated January, 2009.
37. Section 2.1, "Control Measures", requires that if a permittee finds that its control measures are not achieving their intended effect of minimizing pollutant discharges, the permittee must modify these control measures as expeditiously as practicable.
38. Section 2.2.1, "Water Quality Standards" of the 2008 MSGP requires that if a facility discharge causes or contributes to an exceedance of applicable water quality standards, or a discharge violates a numeric effluent limit, the facility must take corrective action as required in Part 3.1, document the corrective actions as required in Parts 3.4 and 5.4, and report the corrective actions to EPA as required in Part 7.2 of the 2008 MSGP. Part 3.1 requires the facility to review and revise the selection, design, installation, and implementation of its control measures to ensure that the condition is eliminated and will not be repeated in the future.

39. Section 3.2 provides that if the average of 4 quarterly sample results exceeds the applicable benchmark, or if less than 4 benchmark samples have been taken, but the results are such that an exceedance of the 4 quarter average is mathematically certain, the permittee must review the selection, design, installation and implementation of its control measures to determine if modifications are necessary to meet the effluent limits of the MSGP.
40. Grimmel Industries has not taken corrective actions, reviewed and revised its SWPPP, or reported corrective actions to EPA, in violation of Parts 2.1; 2.2.1; 2.2.2.2; 3.1; 3.2; 3.4; 5.4; 6.2.4 and 7.2 of the 2008 MSGP.
41. Part 4.1.1, "Routine Facility Inspection Procedures", requires that, at least once each quarter, the permittee conduct routine facility inspections of all areas of the facility where industrial materials or activities are exposed to stormwater and of all stormwater control measures used to comply with the effluent limits contained in the permit. Part 4.1.2 requires that permittees must document the findings of each routine facility inspection performed and maintain this documentation onsite with the SWPPP.
42. Grimmel Industries has not conducted routine facility inspections and documented its findings in violation of Part 4.1 of the 2008 MSGP.
43. Part 4.2.1 of the 2008 MSGP, requires that once each quarter for the entire permit term, a facility must collect a stormwater sample from each outfall and conduct a visual assessment of each of these samples.
44. Based on findings of an August 31, 2010 inspection conducted by EPA, Grimmel did not collect quarterly stormwater samples for visual assessment between February 2009 and the present, in violation of Part 4.2.1 of the 2008 MSGP.
45. Part 4.3, "Comprehensive Site Inspection Procedures", requires that the permittee must conduct annual comprehensive site inspections covering all areas of the facility affected by the requirements of the 2008 permit. Part 4.3.2. requires that the permittee document the findings of each comprehensive site inspection, maintain the documentation on site with the SWPPP, and submit the report to EPA.

46. Grimmel Industries has not conducted comprehensive site inspections and documented its findings in violation of Part 4.3 of the 2008 MSGP.
47. Part 6.2.1 of the 2008 MSGP requires that facilities classified within Sector N conduct benchmark monitoring (2008 MSGP Section 6 and 8.N.6).
48. Grimmel Industries has failed to comply with the 2008 MSGP by failing to conduct benchmark monitoring between February 2009 and the present in violation of the 2008 MSGP Section 6 and 8.N.6.
49. Part 6.2.4 of the MSGP requires facilities that discharge to impaired waters to monitor for all pollutants for which the waterbody is impaired and for which a standard analytical method exists.
50. Grimmel Industries has failed to comply with the 2008 MSGP by failing to conduct monitoring required by Part 6.2.4 between February 2009 and the present in violation of the 2008 MSGP Section 6.
51. From at least February 1, 2009 to the present, Respondent has discharged storm water associated with industrial activity to a "water of the United States" without complying with the terms and conditions of the 2008 MSGP, a permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342, and, therefore, is in violation of Section 301(a) of the Act, 33 U.S.C. § 1311(a).

IV. ORDER

Accordingly, pursuant to Sections 308 and 309(a)(3) of the Act, it is hereby ordered that Grimmel Industries:

52. Immediately stop discharging all process waters to the Piscataqua River including, but not limited to, discharges resulting from spraying scrap metal piles with water for dust suppression purposes.
53. Within 60 days of receipt of this Order, submit an engineering plan to EPA for review and written approval, that will: (A) address the elimination of mercury and PCB discharges to the Piscataqua River; (B) address the elimination and/or reduction of other pollutant discharges as necessary to meet applicable water quality standards; (C) provide for permanent elimination of Grimmel Industries' process wastewater discharge; and (D) include review of the selection, design,

installation and implementation of control measures to determine what modifications are necessary to meet the effluent limits of the 2008 MSGP. Your plan shall be consistent with and in compliance with Section 3 of the 2008 MSGP, Corrective Actions. Your plan shall include a detailed schedule for implementing all of the above measures.

54. Within thirty (30) days of receipt of EPA's written approval of your engineering plan or portions thereof, Grimmel Industries shall begin to implement the engineering plan or portions thereof as approved by EPA.
55. Thirty (30) days after Grimmel Industries begins implementing the engineering plan and each calendar quarter thereafter until all improvements have been achieved, Grimmel Industries shall submit a progress report to EPA. Progress reports shall be post-marked no later than thirty (30) days after the end of each calendar quarter.
56. Grimmel Industries shall immediately begin to collect and analyze stormwater discharges from the Facility in compliance with the 2008 MSGP Sections 6 and 8.N.6.
57. Grimmel Industries shall immediately commence complying with Section 4 of the 2008 MSGP (Inspections).
58. Within thirty (30) days of receipt of this Order, Grimmel Industries shall respond to the Request for Information set forth in Attachment 1 to this Order.

V. NOTIFICATION PROCEDURES

59. Where this Order requires a specific action to be performed within a certain time frame, Grimmel Industries shall submit a written notice of compliance or noncompliance with each deadline. Notification must be mailed within fourteen (14) days after each required deadline. The timely submission of a required report shall satisfy the requirement that a notice of compliance be submitted.
60. Submissions required by this Order shall be in writing and shall be mailed to the following address:

U.S. Environmental Protection Agency
Region I
5 Post Office Square Suite 100
OES04-4
Boston, MA 02109-3912
Attn: Denny Dart

VI. GENERAL PROVISIONS

61. Grimmel Industries may, if it desires, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 C.F.R. § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent set forth in 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Grimmel Industries. Grimmel Industries should carefully read the above-cited regulations before asserting a business confidentiality claim since certain categories of information are not properly the subject of such a claim. For example, the Act provides that "effluent data" shall in all cases be made available to the public. See Section 308(b) of the Act, 33 U.S.C. § 1318(b).
62. This Order shall become effective upon receipt by Grimmel Industries.

04/01/11
Date

Susan Studlien
Susan Studlien, Director
Office of Environmental Stewardship
Environmental Protection Agency, Region I

Attachment 1

A. Instructions

1. Please provide a separate narrative response to each and every question and subpart of a question set forth in this Information Request. Precede each answer with the text and the number of the question and the subpart (a, b, c, etc.) to which the answer corresponds.
2. If any question cannot be answered in full, answer to the extent possible. If your responses are qualified in any manner, please explain.
3. Any documents relied upon or used by you to answer any of the questions in the request must be copied and submitted to EPA with your response. All documents must contain a notation indicating the question and subpart of the question to which they are responsive.
4. If information or documents not known or not available to you as of the date of submission of your response to this request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response, that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide a corrected response.

B. Respond to the Following

1. General Business and Ownership Information Questions
 - a. Specify the full legal name(s) with the exact spelling, the business mailing address, and phone number of Grimmel Industries, L.L.C. (hereafter referred to as "Grimmel Industries"). If incorporated, specify the state of incorporation and the principal place of business. If a partnership, provide the names and addresses of all the partners. If Grimmel Industries has a parent company, please list the parent name and address.
 - b. Please provide a list of all Grimmel Industries facilities in New Hampshire, Maine, Massachusetts, Connecticut and Rhode Island ("New England"). In addition, please provide a list of all facilities in New England that are owned or operated by a subsidiary of Grimmel Industries.
 - c. Specify the entity or entities that own or have owned each of the Grimmel Industries facilities located throughout New England from January 1, 2006 to the present. If any transfer of ownership has occurred, specify the owner(s) prior to and following the transfer, and the dates of transfer.

- d. Provide a diagram that illustrates the corporate and management structure of Grimmel Industries, its parent company, and its subsidiaries. Please identify who has responsibility for environmental compliance within each organization.
2. Please include the following information for each Grimmel Industries facility in New England:
 - a. Full legal name and address of each facility.
 - b. Any names under which each facility does business.
 - c. The date that Grimmel Industries or its subsidiary acquired the facility.
 - d. Describe the operation(s) that have taken place at each facility since January 2006, in chronological order, including the period of time and dates in which the operations occurred. Provide a site map that shows the locations where each of these operations take/have taken place.
 - e. Specify the primary and secondary standard industrial classification (SIC) codes for each facility and its associated operations.

3. Process Wastewater Questions

Unless stated otherwise, the questions in this section of the Information Request relate to the Grimmel Industries facility located at 555 Market Street in Portsmouth, New Hampshire, on property leased from Pease Development Authority. Describe the process wastewaters generated by each operation listed in response to Question 2.d. Process wastewaters are waters that are used in operations at the Site. Process wastewaters are NOT stormwater. Process wastewaters may include, but are not limited to, waters used for dust suppression and truck rinse down.

- a. Specify the source(s) of process wastewater and the operational activity where the process wastewater is used. Specify any sources of contamination to the process wastewater, such as uncovered scrap, contaminants in the scrap or additives that are used in each process.
- b. Describe in detail the transport, treatment, storage, and discharge of process wastewater listed in response to Question 3.a. Provide a site diagram, flow schematic, and/or waste stream diagram to illustrate how process wastewater is managed.
- c. Provide, in gallons per day, estimated or actual daily maximum and monthly average volumetric flow rates discharged from each waste

stream, and the total discharge for the year. If the flow rate is estimated, please indicate how the flows were estimated.

- d. Describe in detail the means by which each process wastewater discharge is transported (i.e. pipe, ditch, swale, overflow, catch basin, etc.) from the facility to the surface water.
- e. For each discharge from any operation or activity to surface water, state the name and location of the surface water.
- f. For each discharge from an operation or activity to surface water, provide the date(s) discharges commenced and the date(s) the discharges ceased if they have been terminated.
- g. Provide the frequency of each type of process wastewater discharge (per week).
- h. Provide a copy of all discharge permits in effect and the permit number and date of coverage. If a permit was not obtained for any process water discharges, provide a detailed explanation as to why a permit was not obtained.

4. Stormwater Questions

Provide the following information:

- a. Provide a copy of each original signed (and dated) application or Notice of Intent ("NOI") used to first obtain stormwater permit coverage, and all subsequent applications or NOIs.
- b. Provide a copy of each original and subsequent permit or permit authorization notice, the permit number(s) and dates of coverage.
- c. Please state the date when the original Stormwater Pollution Prevention Plan ("SWPPP") was prepared and the dates of all revisions to the SWPPP. Please submit a complete copy of all SWPPPs (and amendments thereto) prepared from January 2006 to the present.
- d. Provide a chronological listing of all "Routine Facility Inspections" conducted to evaluate applicable stormwater pollution prevention measures. Please submit a copy of all inspection checklists for inspections performed from January 2006 to the present.
- e. Provide a chronological listing of all "Annual Comprehensive Site Evaluation Inspections". Please submit a copy of all checklists for inspections performed from January 2006 to the present.

- f. Provide a chronological listing of all "Quarterly Visual Monitoring Inspections" of stormwater discharges. Please submit a copy of checklists for all inspections performed from January 2006 to the present.
- g. Provide a chronological listing of when "Benchmark Monitoring Inspections" of stormwater discharges were conducted. Please submit a copy of all results from January 2006 to the present.
- h. Provide a chronological listing of all stormwater inspections and monitoring not included in response to Questions 4(d) through 4(g). Please submit copies of all reports and monitoring results from January 2006 to the present.
- i. Provide the name and credentials of all personnel who performed inspections identified above.
- j. Provide all analytical monitoring results for discharges from January 1, 2006 to the present. Results should be referenced to a facility site diagram to illustrate the exact location where monitoring occurred,

End of Questions

Attachment 2

Statement of Certification

I declare under penalty of perjury that I am authorized to respond on behalf of Grimmel Industries, L.L.C. I certify that the foregoing responses and information submitted were prepared under my direction or supervision and that I have personal knowledge of all matters set forth in the responses and the accompanying information. I certify that the responses are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

By _____
(Signature)

(Printed Name)

(Title)

(Date)