

Joint Statement of

CLF Great Bay-Piscataqua Waterkeeper

Audubon Society of New Hampshire

Great Bay Chapter of Trout Unlimited

Winnicut River Watershed Coalition

To

U.S. Environmental Protection Agency, Region 1

Regarding

Grimmel Industries, LLC, 555 Market St. Scrap Metal Operation, Portsmouth, NH

(Administrative Order Docket No. 11-002 and Docket No. 13-308-18)

We, the undersigned organizations, write to request the Environmental Protection Agency (EPA) to accelerate regulatory actions necessary to eliminate ongoing water pollution problems associated with the Grimmel Industries, LLC scrap metal operation at 555 Market Street in Portsmouth, NH, including requiring Grimmel to install a chemical treatment system to supplement existing clarifier units to treat its discharges of stormwater. We commend the EPA for imposing an Administrative Order in April 2011 requiring a reconfiguration of the site, and the collection and treatment of stormwater at this highly industrial facility. However, much time has passed, and further action is required.

According to the June 3, 2011 compliance and engineering plan prepared for the facility, Grimmel Industries was to install stormwater clarifier units by August 1, 2011, evaluate the effectiveness of those units for a period of six months, and then, “[i]f additional treatment is needed to obtain benchmark levels,” design and construct a chemical treatment system. Monitoring data clearly demonstrate that, since installation and operation of stormwater clarifier units, the site continues to discharge stormwater with significant exceedances (in many cases by orders of magnitude) of EPA benchmark standards for numerous pollutants (lead, copper, aluminum, COD and total suspended solids). These data support the need to promptly require Grimmel Industries to proceed with the design and construction of a chemical treatment system to supplement the existing stormwater clarifier units.

Additionally, in reviewing the EPA Request for Information document sent to Grimmel Industries on July 3, 2013, you posed numerous questions regarding basic operational, procedural and reporting activities that may indeed be in place by now, but if not, should be at the earliest possible time.

Our collective purpose is to be assured that Grimmel Industries LLC complies with the Clean Water Act in short order, particularly in light of the intense nature of its industrial operation, the pollutants associated with that operation, and its discharges directly into the Piscataqua River.

Respectfully submitted,

Jeffrey Barnum
Great Bay-Piscataqua Waterkeeper
Conservation Law Foundation
27 N. Main St., Concord, NH 03301-4930
jbarnum@clf.org

Michael Bartlett
President
Audubon Society of New Hampshire
84 Silk Farm Rd.
Concord, NH 03301

Dr. Mitchell Kalter
President
Great Bay Trout Unlimited
PO Box 1121
Dover, NH 03821

Jean Eno
Project Director
Winnicut River Watershed Coalition
54 Portsmouth St.
Concord, NH 03301