

DEQ / DEMLR
FACT SHEET FOR NPDES INDUSTRIAL INDIVIDUAL
STORMWATER PERMIT DEVELOPMENT

Basic Information for Permit Issuance and Renewals:

Permit Writer / Date	Brianna Young 5/16/2023
Permit Number	NCS000050
Owner / Facility Name	SCM Metal Products, Inc / SCM Metal Products, Inc.
SIC (NAICS) Code / Category	3399 (331420) / Primary Metal Products
Basin Name / Sub-basin number	001: Cape Fear / 03-06-05 002 and 003: Neuse / 03-04-02
Receiving Stream / HUC	001: UT to Northeast Creek / 030300020605 002 and 003: Stirrup Iron Creek / 030202010801
Stream Classification / Stream Segment	001: WS-V; NSW / 16-41-1-17-(0.3) 002 and 003: C; NSW / 27-33-4-2
Is the stream impaired [on 303(d) list]?	No
Any TMDLs?	No
Any threatened and/or endangered species?	No
Any compliance concerns?	See Section 2 (below)
Any permit mods since last permit?	See Section 1 (below)
New expiration date	6/30/2028
Comments on Draft Permit?	See Section 6 (below)

Section 1. Facility Activities and Process:

SCM Metal Products, Inc. is a facility that produces copper powder, copper oxide, tin powders, antimony powder, and Cubond Brazing Paste for industrial applications. Flammable materials are stored outside under roof and in secondary containment. Water in a bioretention cell infiltrates into the ground, however, if there is ever any overflow, the water for the riser in the bioretention cell is piped to Outfall SW001.

Significant changes at the facility since the last permit renewal include:

- Brazing manufacturing process was moved from an outside building into the main facility in March 2013
- Most additives are stored indoors except some drums of flammable liquids (required to store outdoors); Drums are stored on secondary containment pallets and covered with tarps.
- New process added April 2019: antimony ingots processed into antimony powder (crushing ingots, grinding/milling and screening)
- Former drum crusher was decommissioned and removed in 2018; Empty drums are now exchanged with the chemical vendor
- Catalyst process that was in the TL#3 room was decommissioned and all equipment was removed in December 2021
- Tin, NuTin, and Bismuth processes commissioned in September 2022, producing tin powder, tin-copper alloy powders, and bismuth powders through air atomization and screening.
 - Tin manufacturing previously discontinued December 2013 (moved to another location)

- Bismuth production will include the melting of bismuth ingot and air atomization of the molten metal to create bismuth powder, and screening operations
 - NuTin process will include the melting and air atomization of a 90/10 tin/copper mixture; resulting powder will include dry handling operations such as screening
- There are plans to install a water copper process in the main production area and a continuous belt reduction furnace during 2022 Q4
 - As a part of this construction, the wastewater pretreatment system been moved to the Brazing Manufacturing Process area. This will include moving the process tank outside, near the current storage tank. This tank will be installed inside of a secondary containment bunker.
 - Per information provided 10/25/2022: The process tank being moved outside is part of the non-process wastewater pretreatment system. This is similar to the large wastewater storage tank that receives wastewater from the employee shower drains, restroom sinks, and laboratory sinks. The water from these drains is collected in the large wastewater storage tank, then pumped into the process tank. Wastewater from the smaller process tank is then run through a series of 72 membrane filters, which is then run through a resin bed filter prior to being discharged to the sanitary sewer. The location of the process tank will be in close proximity to the existing large wastewater storage tank and located inside a concrete secondary containment.
- Per email communication dated 9/22/2022, outfall SW003 was added in September 2011.

Outfall SW001:

Drainage area contains a parking area, storage pad, copper production warehouse, production plant warehouse, a bioretention pond, new pallets storage, scrap materials, scrap metal, process equipment storage, liquid hydrogen storage and loading/unloading operations, copper storage area, slag material from melt furnace skimming operations, processing of antimony ingots into powder, air atomization of tin, tin-copper alloy, and bismuth, dumpsters, trash compactor, oil drum storage building, ethylene glycol and SCM mix storage, waste oil storage tank, maintenance shop, a cooling tower, oil storage building, and bulk storage tanks for argon, propane, liquid oxygen, and liquid nitrogen.

Outfall SW002:

Drainage area contains the road providing access to the manufacturing areas of the plant parking lot, administrative offices, loading/unloading area, and R&D lab area. The primary source of storm water contamination in this area is through accidental spills that could occur during transport of raw materials and wastes.

Outfall SW003:

Drainage area contains vegetated areas, a parking lot, the Microbond building, production of Cubond® Brazing paste, storage of tin powders, a wastewater treatment tank, and a wastewater process tank. The outfall is a settling device which retains rainwater to allow solids to settle prior to being discharged.

Why Industrial Sites with Stormwater are Subject to a Permit: Federal NPDES regulations define stormwater discharge associated with industrial activity in 40 CFR §122.26 (b)(14) as: “the discharge from any conveyance that is used for collecting and conveying storm water and that is directly related to manufacturing, processing or raw materials storage areas at an industrial plant. The term does not include discharges from facilities or activities excluded from the NPDES program under this part 122. For the categories of industries identified in this section, the term includes, but is not limited to, storm

water [sic] discharges from industrial plant yards; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or byproducts used or created by the facility; material handling sites; refuse sites; sites used for the application or disposal of process waste waters (as defined at part 401 of this chapter); sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and final products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to storm water. For the purposes of this paragraph, material handling activities include storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product, byproduct or waste product. The term excludes areas located on plant lands separate from the plant's industrial activities, such as office buildings and accompanying parking lots as long as the drainage from the excluded areas is not mixed with storm water [sic] drained from the above described areas."

Section 2. Monitoring Information and Compliance History:

- May 2012 to March 2022, benchmarks exceeded for:
 - SW001: TSS 1x, Zinc 7x, Copper 23x
 - SW002: Copper 23x
 - SW003: TSS 1x, Copper 23x
- Copper was exceeded for every outfall for every sampling point provided, however, Tiered Response was not implemented by the permittee.
- Per an inspection letter dated 8/23/2011, SW001 is representative of all 3 outfalls
- On 11/4/2021, it's estimated 800 to 900 gallons of cooling water discharged to SW001 through storm drains. The cooling water is non-contact cooling water that is treated with a corrosion inhibitor at a concentration of 25ppm.
- Downstream of the discharge location, Northeast Creek (SW001 receiving stream) is impaired for turbidity, copper, and zinc. During previous permit renewals, the City of Durham had concerns about air emissions from this facility potentially contributing to the degradation of the stream.
- Permit file history for previous permits shows DEQ staff concerns over copper at the facility and implementing BMPs to prevent pollution to Northeast Creek.
 - Lots of discussion and meetings between DEQ and SCM staff
- Per an email from Raleigh Regional Office staff (dated 12/13/2022), based on the December 2022 inspection, copper dust was everywhere, with a layer inside the facility (so much that the RRO inspector asked if it was safe to breath in). RRO staff stated the biggest issue seemed to be the copper getting tracked out by workers who are leaving doors open and running equipment through the dust, but that all BMPs were being implemented at some level.

Section 3. Proposed Monitoring for Stormwater Discharges:

The Division considered potential pollutants from past and present industrial activities and data was submitted for May 2012 to March 2022. Quantitative sampling included pH, TSS, copper, and zinc.

Parameters are based on potential pollutants in the drainage area, sampling results, and in some cases, dependent upon future activities (e.g., ash removal through the drainage area). Below is a table of the proposed monitoring for each outfall at the SCM Metal Products, Inc. site.

Outfalls SW001, SW002, SW003	
Total Suspended Solids (TSS)	Quarterly monitoring BASIS: Potential pollutant from drainage area and BMP effectiveness indicator.
pH	Quarterly monitoring BASIS: Pollutant indicator and important to interpreting toxicity potential of metals.
Total Rainfall	Quarterly monitoring BASIS: Discharge potential indicator
Non-Polar Oil & Grease	Quarterly monitoring BASIS: Potential pollutant from lubricants; Method 1664 SGT-HEM targets petroleum-based O&G
Monthly Oil Usage	Quarterly monitoring BASIS: Potential pollutant from drainage area
COD	Quarterly monitoring BASIS: Discharge potential indicator
Total Nitrogen	Quarterly monitoring BASIS: Discharge potential indicator
Antimony	Quarterly monitoring BASIS: Potential pollutant from drainage area
Total Copper	Quarterly monitoring BASIS: Potential pollutant from drainage area
Total Zinc	Quarterly monitoring BASIS: Potential pollutant from drainage area

Stormwater Benchmarks and Tiered Response: Rather than limits, North Carolina NPDES Stormwater permits contain benchmark concentrations. Stormwater benchmarks are numerical action levels for stormwater monitoring. Benchmarks are not effluent limits, and benchmark exceedances are not permit violations. Benchmarks provide facilities a tool for assessing the significance of pollutants in stormwater discharges and the effectiveness of best management practices (BMPs). Benchmark concentrations are intended as guidelines for the facility's development and implementation of the Stormwater Pollution Prevention Plan (SWPPP).

Benchmark exceedances require the permittee to increase monitoring, increase management actions, increase record keeping, and/or install stormwater BMPs in a tiered program. The permit establishes a tiered approach to specify actions the permittee must take in response to analytical results above benchmark concentrations. The tiered structure of the permit provides the permittee and DEMLR wide flexibility to address issues that may arise with one or more parameters and/or outfalls.

Metals benchmarks are calculated to mimic acute water quality standards and with the guidance of DWR. NC DWR follows established federal procedures for calculating acute standards when developing the benchmarks. Just like the acute standards, metals benchmarks normally reflect one half of the calculated Final Acute Value (the "1/2 FAV"). In most cases, translation into total recoverable values is based on an assumed hardness of 25 mg/L and a total suspended solids (TSS) concentration of 10 mg/L. Acute standards protect aquatic life from negative impacts of short-term exposure to higher levels of chemicals where the discharge enters a waterbody. The Stormwater Permitting Program applies this approach because of the ephemeral nature of rainfall events.

The Division may evaluate results to determine if a smaller suite of parameters for some outfalls is adequate to characterize potential pollution or BMP effectiveness. For example, one or more metals or other parameters may serve as an adequate tracer for the presence of ash pollution during disturbance or ash removal in specific drainage areas at this site. For parameters that do not have a stormwater benchmark, the Division may develop a benchmark value if appropriate toxicity data become available or if rising trends in concentrations suggest a persistent source.

A summary of the benchmarks in the draft permit, and their basis, is below:

Parameter	Benchmark	Basis
Total Suspended Solids (TSS)	100 mg/L	National Urban Runoff Program (NURP) Study, 1983
pH	6 s.u. – 9 s.u.	NC Water Quality Standard (Range)
Non-Polar Oil & Grease EPA Method 1664 (SGT-HEM)	15 mg/L	Review of other state's daily maximum benchmark concentration for this more targeted O&G; NC WQS that does not allow oil sheen in waters
COD	120 mg/L	BPJ; Generally found at levels 4x BOD5 in domestic wastewaters
Total Nitrogen	30 mg/L	TKN + Nitrate + Nitrite Benchmarks (Expressed in mg/L of N)
Antimony	340 µg/L	½ FAV
Copper (Total)	10 µg/L	Acute Aquatic Criterion, ½ FAV
Zinc (Total)	126 µg/L	Acute Aquatic Criterion, ½ FAV

Stormwater Pollution Prevention Plan: The proposed permit conditions reflect the EPA and NC's pollution prevention approach to stormwater permitting. The Division's maintains that implementation of Best Management Practices (BMPs) and traditional stormwater management practices that control the source of pollutants meets the definition of Best Available Technology (BAT) and Best Conventional Pollutant Control Technology (BCT). The permit conditions are not numeric effluent limitations but are designed to be flexible requirements for implementing site-specific plans to minimize and control pollutants in stormwater discharges associated with the industrial activity. Title 40 Code of Federal Regulations (CFR) §122.44(k)(2) authorizes the use of BMPs in lieu of numeric effluent limitations in NPDES permits when the agency finds numeric effluent limitations to be infeasible. The agency may also impose BMP requirements which are "reasonably necessary" to carry out the purposes of the Act under the authority of 40 CFR 122.44(k)(3). The conditions proposed in this draft permit are included under the authority of both of these regulatory provisions. In essence, the pollution prevention and BMP requirements operate as limitations on effluent discharges that reflect the application of BAT/BCT.

Flexibility in Tier Responses: Tier Two actions provide an opportunity for the permittee to propose an alternative monitoring plan for approval by the Region:

- Alternatively, in lieu of steps 2 and 3, the permittee may, after two consecutive exceedances, exercise the option of contacting the DEMLR Regional Engineer as provided below in Tier Three. The Regional Engineer may direct the response actions on the part of the permittee as provided in Tier Three, including reduced or additional sampling parameters or frequency.
- If pursuing the alternative above after two consecutive exceedances, the permittee may propose an alternative monitoring plan for approval by the Regional Engineer.

The permit therefore allows the permittee to petition the Regional Office for monitoring changes sooner than Tier Three (upon any four benchmark exceedances) and gives guidance on one option to take. For example, the permittee may request that mercury only be monitored semi-annually under the tiers, or that only parameters over the benchmark be monitored more frequently. In this way, changes to the monitoring scheme for any outfall could be handled outside of a permit modification.

Other Proposed Requirements:

- It is standard for Stormwater Pollution Prevention Plan (SWPPP) requirements to include an annual certification that stormwater outfalls have been evaluated for the presence of non-stormwater discharges, and if any are identified, how those discharges are permitted or otherwise authorized.
- Requirement to submit a request for permit modification if the facility identifies or creates any new outfalls, removes outfalls, or alters any drainage area that changes potential pollutants.
- The Division expects the permittee to apply best professional judgment and consider the safety of its personnel in fulfilling sampling obligations under the permit.
- Federal regulations require electronic submittal of all discharge monitoring reports (DMRs). If a state does not establish a system to receive such submittals, then permittees must submit DMRs electronically to the EPA.
- Quarterly Qualitative/Visual Monitoring to assure regular observation of outfalls throughout year.

Section 4. Changes from previous permit to draft:

- Monitoring increased from semi-annually to quarterly for all parameters (qualitative and quantitative)
- “No discharge” clarifications made
- eDMR requirement added
- Feasibility study requirement removed per updated stormwater program requirements
- Boilerplate language moved into body of the permit; boilerplate no longer attached
- Monitoring for total hardness added for all outfalls as monitoring for hardness dependent metals is required
- Benchmarks updated for parameters per guidance from DWR Standards group on stormwater benchmarks
- Monitoring for COD added as a potential pollutant indicator due to presence of materials stored onsite
- Monitoring for total nitrogen added as liquid nitrogen is stored onsite
- Monitoring for antimony added as manufacturing has been added
- BMP permit condition updated

Section 5. Changes from draft to final:

- None

Section 6. Discussions with the Facility and Regional Office:

- Initial contact with facility: 9/12/2022
- Initial contact with Regional Office: 9/16/2022
- Draft sent to CO peer review: 1/23/2023
- Draft sent to Regional Office: 1/24/2023
- Final permit sent for supervisor signature: 5/17/2023

Section 7. Comments received on draft permit:

- **Michelle Woolfolk** (City of Durham; via email 3/27/2023): The City has no comments. We do have questions regarding the use of benchmarks, but that is more for the state.
- **Permittee representative** (via phone 4/14/2023): Permittee does not think they will be able to meet copper and zinc benchmarks (were not in last permit); permittee may request a stepwise/drop down in benchmark levels over permit term or a compliance schedule so they can get extra controls on copper; Permittee may request ROS potentially.
- **Jonathan White** (SCM Metal Products, Inc.; via email 4/28/2023; summarized here):
 - Given historical data, and despite recent and planned efforts to reduce discharges, it is difficult to predict when SCM may be able to achieve these benchmarks. It is therefore unreasonable for NCDEQ to impose a permit with unattainable benchmarks. Hardness and site-specific considerations should be accounted for to have a tailored approach that reflects a facility-specific nature in developing benchmarks.
 - **DEMLR Response:** Stormwater benchmarks are not based on the type of permit issued, but are developed in conjunction with the DEQ DWR Classifications and Standards Branch. All general and individual industrial permits issued by the Stormwater Permitting Program use the same benchmarks for pollutants of concern for a specific facility or industry. Different benchmarks for different facilities/permits are not permitted.
 - In lieu of the tier structure proposed in the draft permit, SCM proposes that DEMLR include a permit requirement that SCM develop a stormwater controls enhancement plan, to be approved by DEMLR, that commits SCM to develop and implement enhanced stormwater controls under a reasonable time schedule.
 - **DEMLR Response:** Tiered Response is a Stormwater Permitting Program requirement of all individual industrial permits. Therefore, Tiered Response will remain in the permit as drafted.
 - In place of a Total Antimony benchmark, SCM proposes inclusion of Total Antimony in quarterly sampling of Outfall SW002, as the stormwater runoff from the antimony process area discharges only to Outfall SW002.
 - Follow-up clarification (Westley Riscili via email 5/16/2023): You are correct. Stormwater runoff for the area in which the antimony process is located does in

fact discharge to SW001, as indicated on the site map. The site map that was provided on October 7, 2022 is correct.

- **DEMLR Response:** Monitoring for Total Antimony will remain for all outfalls as access roads are throughout the site, with potential tracking from vehicles or other means, and there has been previous concerns regarding potential air deposition. As a stormwater benchmark exists for Total Antimony, the benchmark will remain in the permit.
- The draft permit cover letter indicates that the Feasibility Study was removed, yet it is still referenced in Part E of the draft permit.
 - **DEMLR Response:** This was an oversight and erroneously not removed from the permit. The reference to the Feasibility Study will be removed.
- DEMLR also added benchmarks for Non-Polar Oil & Grease, Chemical Oxygen Demand, and Total Nitrogen, citing to no supporting logic. SCM urges DEMLR to tailor the final permit to SCM's facility, remedy the inconsistencies, and provide support for the additional parameter benchmarks.
 - **DEMLR response:** Monitoring for Non-polar Oil & Grease is required monitoring for all individual industrial permits and, as stated in the draft permit, is only required for drainage areas that use >55 gallons/month of oil on average per EPA Method 1664 (SGT-HEM). Monitoring for Chemical Oxygen Demand and Total Nitrogen were added to the permit due to the type of materials stored onsite.



Beaufort Gazette	The Herald - Rock Hill	el Nuevo Herald - Miami	Sun News - Myrtle Beach
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AFFIDAVIT OF PUBLICATION

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Attention: Paul Clark

NC DENR ENGERGY MINERAL & LAND RESOURCES
1612 MAIL SERVICE CENTER
RALEIGH, NC 276991612

**NORTH CAROLINA ENVIRONMENTAL
MANAGEMENT COMMISSION INTENT TO ISSUE
NPDES STORMWATER DISCHARGE PERMITS**

The North Carolina Environmental Management Commission proposes to issue NPDES stormwater discharge permit(s) to the person(s) listed below. Public comment or objection to the draft permits is invited. Written comments regarding the proposed permit will be accepted until 30 days after the publish date of this notice and considered in the final determination regarding permit issuance and permit provisions. The Director of the NC Division of Energy, Mineral, and Land Resources (DEMLR) may hold a public hearing should there be a significant degree of public interest. Please mail comments and/or information requests to DEMLR at 1612 Mail Service Center, Raleigh, NC 27699-1612.

- SCM Metal Products, Inc. [2601 Week Drive, Research Triangle Park, NC] has requested renewal of permit NCS000050 for the SCM Metal Products, Inc. in Durham County. This facility discharges to an unnamed tributary to Northeast Creek in the Cape Fear River Basin and Stirrup Iron Creek in the Neuse River Basin.

Interested persons may visit DEMLR at 512 N. Salisbury street, Raleigh, NC 27604 to review information on file. Additional information on NPDES permits and this notice may be found on our website: <https://deq.nc.gov/about/divisions/energy-mineral-and-land-resources/stormwater/stormwater-program/stormwater-public-notices>, or by contacting Brianna Young at brianna.young@ncdenr.gov or 919-707-3647.

IPL0117378
Apr 7 2023

**STATE OF NORTH CAROLINA
COUNTY OF WAKE, COUNTY OF DURHAM**

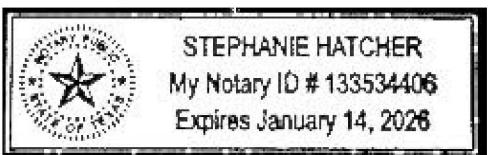
Before the undersigned, a Notary Public of Dallas County, Texas, duly commissioned and authorized to administer oaths, affirmations, etc., personally appeared Tara Pennington, who being duly sworn or affirmed, according to law, doth depose and say that he or she is Accounts Receivable Specialist of the News & Observer Publishing Company, a corporation organized and doing business under the Laws of the State of North Carolina, and publishing a newspaper known as The News & Observer, Wake and State aforesaid, the said newspaper in which such notice, paper, document, or legal advertisement was published was, at the time of each and every such publication, a newspaper meeting all of the requirements and qualifications of Section 1-597 of the General Statutes of North Carolina and was a qualified newspaper within the meaning of Section 1-597 of the General Statutes of North Carolina, and that as such he or she makes this affidavit; and is familiar with the books, files and business of said corporation and by reference to the files of said publication the attached advertisement for NC DENR ENGERGY MINERAL & LAND RESOURCES was inserted in the aforesaid newspaper on dates as follows:

1 insertion(s) published on:

04/07/23

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Notary Public in and for the state of Texas, residing in Dallas County



Extra charge for lost or duplicate affidavits.
Legal document please do not destroy!

Young, Brianna A

From: Westley Riscili <westley.riscili@kymerainternational.com>
Sent: Tuesday, May 16, 2023 3:33 PM
To: Young, Brianna A
Cc: Jonathan White; David Singer
Subject: RE: [External] Comments on NPDES Permit NC000050, SCM Metal Products, Inc., Durham County

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Dear Ms. Young,

Yes, you are correct. Stormwater runoff for the area in which the antimony process is located does in fact discharge to SW001, as indicated on the site map. The site map that was provided on October 7, 2022 is correct. Please let me know if you have any additional inquiries.

Best regards,

Westley Riscili, CQIA
N.A. Environmental Compliance Manager

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Mobile +1 (716) 307.3191
westley.riscili@kymerainternational.com

ACuPowder | AmeriTi Manufacturing | CASL Surface Technologies | ECKA Granules | Innobraze |
Reading Alloys | SCM Metal Products | Telex Metals | Thermal Spray Solutions
www.kymerainternational.com



From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Tuesday, May 16, 2023 9:58 AM
To: Westley Riscili <westley.riscili@kymerainternational.com>

Cc: Jonathan White <jonathan.white@kymerainternational.com>; David Singer <David.Singer@kymerainternational.com>
Subject: RE: [External] Comments on NPDES Permit NC000050, SCM Metal Products, Inc., Durham County

[[EXTERNAL EMAIL]]

Good morning,

After reviewing the comments submitted on the draft permit, I have one question. You state “stormwater runoff from the antimony process area discharges only to Outfall SW002.” However, in information you provided October 7, 2022, the antimony processing area is shown as a part of Outfall SW001 (see attached). Please confirm whether the information in the attached site map is accurate. If it is not accurate, please provide an accurately updated site map as soon as possible.

Thank you,

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (e-mail preferred)
919-707-3647 (office)

Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612
Physical address: 512 North Salisbury Street, Raleigh, NC 27604

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.

Based on the current guidance to minimize the spread of COVID-19, the Department of Environmental Quality has adjusted operations to protect the health and safety of the staff and public. Please check with the appropriate staff before visiting our offices, as we may be able to handle your requests by phone or email. We appreciate your patience as we continue to serve the public during this challenging time.

From: Young, Brianna A
Sent: Tuesday, May 2, 2023 11:26 AM
To: Westley Riscili <westley.riscili@kymerainternational.com>
Cc: Jonathan White <jonathan.white@kymerainternational.com>; David Singer <David.Singer@kymerainternational.com>
Subject: RE: [External] Comments on NPDES Permit NC000050, SCM Metal Products, Inc., Durham County

Good morning,

Thank you for submitting comments on the draft permit. I will review these as part of the final issuance process.

Thank you,

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

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From: Westley Riscili <westley.riscili@kymerainternational.com>

Sent: Friday, April 28, 2023 4:46 PM

To: Young, Brianna A <Brianna.Young@ncdenr.gov>

Cc: Jonathan White <jonathan.white@kymerainternational.com>; David Singer

<David.Singer@kymerainternational.com>

Subject: [External] Comments on NPDES Permit NC000050, SCM Metal Products, Inc., Durham County

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Dear Ms. Young,

Please see the enclosed comments of SCM Metal Products on the referenced permit. Please confirm receipt of this email.

Best regards,

Westley Riscili, CQIA – N.A. Environmental Compliance Manager
Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA

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ACuPowder | AmeriTi Manufacturing | CASL Surface Technologies | ECKA Granules | Innobraze |
Reading Alloys | SCM Metal Products | Telex Metals

www.kymerainternational.com



Young, Brianna A

From: Woolfolk, Michelle <Michelle.Woolfolk@durhamnc.gov>
Sent: Monday, March 27, 2023 3:16 PM
To: Young, Brianna A
Subject: RE: [External] RE: NC DEQ Stormwater Permit for SCM Metal Products, Inc.

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Thanks for checking back. The City has no comments. We do have questions regarding the use of benchmarks, but that is more for the state.

Michelle

Michelle Woolfolk
City of Durham Public Works Department
Stormwater Division
Michelle.Woolfolk@durhamnc.gov

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Monday, March 27, 2023 2:38 PM
To: Woolfolk, Michelle <Michelle.Woolfolk@durhamnc.gov>
Subject: RE: [External] RE: NC DEQ Stormwater Permit for SCM Metal Products, Inc.

Good afternoon Michelle,

I wanted to follow up on my previous email as I had not received a response. Does the City of Durham have any comments or questions on the SCM Metal Products draft stormwater permit (NCS000050)? If the City has no comments, I will move to put the draft permit out to public notice within the next two weeks.

Thank you,

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (*e-mail preferred*)
919-707-3647 (office)

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Physical address: 512 North Salisbury Street, Raleigh, NC 27604

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From: Young, Brianna A
Sent: Wednesday, March 1, 2023 1:14 PM
To: Woolfolk, Michelle <Michelle.Woolfolk@durhamnc.gov>
Subject: RE: [External] RE: NC DEQ Stormwater Permit for SCM Metal Products, Inc.

Good afternoon,

A copy of the preliminary draft permit is attached. Please let me know if you have any questions or would like to set up a call to discuss the permit and/or facility.

Thank you,

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (e-mail preferred)
919-707-3647 (office)

Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612
Physical address: 512 North Salisbury Street, Raleigh, NC 27604

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From: Woolfolk, Michelle <Michelle.Woolfolk@durhamnc.gov>
Sent: Tuesday, February 28, 2023 9:37 AM
To: Young, Brianna A <Brianna.Young@ncdenr.gov>
Subject: RE: [External] RE: NC DEQ Stormwater Permit for SCM Metal Products, Inc.

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

Send the draft to me. I will coordinate the City response.

Michelle Woolfolk
City of Durham Public Works Department
Stormwater Division
Michelle.Woolfolk@durhamnc.gov

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Tuesday, February 28, 2023 9:34 AM
To: Woolfolk, Michelle <Michelle.Woolfolk@durhamnc.gov>
Subject: RE: [External] RE: NC DEQ Stormwater Permit for SCM Metal Products, Inc.

Hello Michelle,

I should have a draft ready for your review this week. We would welcome the opportunity to discuss any issues. Please let me know who should receive the preliminary draft and I will include all parties on the email.

Thank you,

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

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From: Woolfolk, Michelle <Michelle.Woolfolk@durhamnc.gov>
Sent: Tuesday, February 28, 2023 9:15 AM
To: Young, Brianna A <Brianna.Young@ncdenr.gov>
Subject: [External] RE: NC DEQ Stormwater Permit for SCM Metal Products, Inc.

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Hello Brianna. Yes, the City would like to be involved in the renewal of the stormwater permit. We would not only like a copy of the draft permit before it goes to public notice, but would also appreciate the opportunity to discuss issues with you.

Thank you for reaching out. When do you anticipate having a preliminary draft permit?

Michelle

Michelle Woolfolk
City of Durham Public Works Department
Stormwater Division
Michelle.Woolfolk@durhamnc.gov

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Tuesday, February 28, 2023 9:05 AM
To: Woolfolk, Michelle <Michelle.Woolfolk@durhamnc.gov>
Subject: NC DEQ Stormwater Permit for SCM Metal Products, Inc.

Good morning,

I am with the NC DEQ Stormwater Permitting Program. I am working on renewing the stormwater permit for SCM Metal Products, Inc. (NCS000050), located in Durham County at 2601 Weck Drive. According to our permit files, the City of Durham was very involved in the renewal of the last stormwater permit for this facility. Is this permit still of interest to the City of Durham? I am preparing the updated draft permit for public notice and am reaching out to confirm if the City would like to provide comments before I submit the draft to public notice. If you are not the correct contact for this request, can you please point me in the right direction?

Thank you,

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (e-mail preferred)
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Young, Brianna A

From: Valentine, Thad
Sent: Tuesday, December 13, 2022 9:27 AM
To: Garcia, Lauren V; Young, Brianna A; Carson, Brittany; Georgoulias, Bethany
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

Looking at Laurens inspection report for the facility, she gives them 5 stars for PP&G and their BMP's. I don't see any deficiencies noted or recommendations, other than continued sweeping, so it appears they do everything possible to control pollutants from entering the stormwater and leaving the site. This may be one of those sites where we need to make a judgement call. If there needs to be a conversation, let me know.

Thad Valentine

Environmental Senior Specialist – RRO
Division of Energy, Mineral, and Land Resources – Land Quality Section
Department of Environmental Quality

919 791 4220 office
thad.valentine@ncdenr.gov

1628 Mail Service Center, Raleigh, North Carolina 27699

From: Garcia, Lauren V <lauren.garcia@ncdenr.gov>
Sent: Tuesday, December 13, 2022 8:33 AM
To: Young, Brianna A <Brianna.Young@ncdenr.gov>; Valentine, Thad <thad.valentine@ncdenr.gov>; Carson, Brittany <brittany.carson@ncdenr.gov>; Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

My bad, if the copper tier relief was requested at another facility, an inspection probably needs to be done there...

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Friday, December 9, 2022 4:03 PM
To: Valentine, Thad <thad.valentine@ncdenr.gov>; Carson, Brittany <brittany.carson@ncdenr.gov>; Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>
Cc: Garcia, Lauren V <lauren.garcia@ncdenr.gov>
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

Sorry for the second email. I just looked up the distance between the two facilities and they seem to be about 3 miles apart. Not sure if that affects any thinking.

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

[\(e-mail preferred\)](mailto:Brianna.Young@ncdenr.gov)
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From: Young, Brianna A
Sent: Friday, December 9, 2022 3:33 PM
To: Valentine, Thad <thad.valentine@ncdenr.gov>; Carson, Brittany <brittany.carson@ncdenr.gov>; Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>
Cc: Garcia, Lauren V <lauren.garcia@ncdenr.gov>
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

SCM has many copper exceedances (basically every sample period reviewed for permit renewal). Zinc has a couple of exceedances but is not a chronic problem. Lauren's inspection report indicated the facility does have good BMPs in place, but that copper is still getting out of the facility. Is there anything I need to add to SCM's BMP permit condition? Or should we just tell them they need to look into other options to stop copper being tracked outside?

How can we assess/confirm whether air deposition is coming from SCM onto Wolfspeed (as Wolfspeed claims)? What do we need to do/review to move the SCM permit and Wolfspeed relief request forward?

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

[\(e-mail preferred\)](mailto:Brianna.Young@ncdenr.gov)
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From: Valentine, Thad <thad.valentine@ncdenr.gov>
Sent: Friday, December 9, 2022 12:47 PM
To: Young, Brianna A <Brianna.Young@ncdenr.gov>; Carson, Brittany <brittany.carson@ncdenr.gov>; Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>
Cc: Garcia, Lauren V <lauren.garcia@ncdenr.gov>
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

If they are sampling all their outfall areas and copper is not an issue, I don't think there is anything else beyond what is required and actively being done that would need to be added. If they are getting high readings, they should have their consultant investigate other options to reduce the tracking of copper.

If the permittee that believes that the SCM facility is the cause of their high copper sample results can sample the flow coming onto their site from the SCM facility to confirm that the issue originates there, we can look at providing tier relief, if they provide their proof.

Thad Valentine

Environmental Senior Specialist – RRO
Division of Energy, Mineral, and Land Resources – Land Quality Section
Department of Environmental Quality

919 791 4220 office
thad.valentine@ncdenr.gov

1628 Mail Service Center, Raleigh, North Carolina 27699

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Friday, December 9, 2022 11:25 AM
To: Carson, Brittany <brittany.carson@ncdenr.gov>; Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>
Cc: Valentine, Thad <thad.valentine@ncdenr.gov>; Garcia, Lauren V <lauren.garcia@ncdenr.gov>
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

Lauren conducted an inspection this week on the SCM facility as part of the renewal. Based on the inspection report, it sounds like they have good BMPs in place but that copper does get tracked outside the processing facility from feet and tires. Is there anything we should add to the permit as another facility is citing SCM for their issues? There is already a BMP condition in the permit to address copper issues:

The Permittee shall implement the following BMPs at this facility and shall include these BMPs in the facility's SWPPP:

- (a) The Permittee shall ensure entryways and loading areas near manufacturing areas where dust track-out occurs are swept daily, and that cleaning procedures are conspicuously posted within the affected work areas.
- (b) The Permittee shall ensure routine evaluations by employee task groups of BMPs intended to reduce copper or other metal dust exposure and shall identify practices or areas in need of improvement.
- (c) The Permittee shall implement BMPs to reduce fugitive dust, including but not limited to:
 - i. Moving fork truck and sweeper maintenance indoors;
 - ii. Improving preventative maintenance for dust collectors; and
 - iii. Handling and storing glycerin in reusable containers.

For BMPs that have already been implemented, the Permittee shall ensure those practices are maintained as long as they effectively reduce fugitive dust.

- (d) The Permittee shall maintain an Operation and Maintenance (O&M) Plan for any structural BMPs, such as bioretention cells. The O&M Plan must indicate actions that shall be taken, specific criteria used for determining when those actions shall be taken, and who is responsible for those actions. The plan must clearly indicate the steps that shall be taken and who shall be responsible to restore the structural stormwater BMP systems to design specifications if a failure occurs and must include acknowledgement by the responsible party.
- (e) For areas the Permittee has determined to be primary contributions to copper or other metals in runoff from this facility, either through the Monitoring Plan approved by the Division in May 2007 or by other means, the Permittee shall continue to:

- i. Assess BMPs intended to reduce dust release and track-out from industrial activities;
- ii. Improve dust collection efficiency;
- iii. Reduce other sources of copper or other metals contamination; and/or
- iv. Capture and treat the runoff with engineered controls.

The Permittee shall maintain current information about selected BMPs, their implementation, and effectiveness in reducing metals concentrations in the Stormwater Pollution Prevention Plan. That information should include reference to DWR stormwater benchmark concentrations for total recoverable copper and zinc, currently 10 µg/L and 126 µg/L. All or part of this information should be incorporated into the Feasibility Study component of the Stormwater Management Plan (see Part B Section B-8 of Stormwater Pollution Prevention Plan requirements) as appropriate.

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (e-mail preferred)
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From: Young, Brianna A
Sent: Tuesday, November 29, 2022 8:58 AM
To: Carson, Brittany <brittany.carson@ncdenr.gov>; Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>
Cc: Valentine, Thad <thad.valentine@ncdenr.gov>
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

NCS000050 is currently undergoing review for renewal. It's on RRO's inspection list for the renewal, so will be interesting to see what they find. Their DMR data didn't show big zinc issues, but they have a lot of copper exceedances at all 3 of their outfalls.

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

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From: Carson, Brittany <brittany.carson@ncdenr.gov>

Sent: Tuesday, November 29, 2022 8:10 AM

To: Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>

Cc: Valentine, Thad <thad.valentine@ncdenr.gov>; Young, Brianna A <Brianna.Young@ncdenr.gov>

Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

Thanks Bethany,

This is an interesting one. Brianna and I will collaborate on this.

Brittany Carson

General Industrial Stormwater Permit Coordinator

Stormwater Program, Division of Energy, Mineral, and Land Resources

N.C. Department of Environmental Quality

Phone: (919) 707-3648

From: Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>

Sent: Monday, November 28, 2022 5:01 PM

To: Carson, Brittany <brittany.carson@ncdenr.gov>

Cc: Valentine, Thad <thad.valentine@ncdenr.gov>; Young, Brianna A <Brianna.Young@ncdenr.gov>

Subject: FW: [External] Request for Relief from Advance Tier Response for Copper and Zinc

Greetings, Brittany – getting you and Brianna in the loop on this. I've saved the records to both GP COC files in Laserfiche.

Including Brianna because there's a reference to a potential influence from Kymera (formerly SCM Metal), which is under an individual permit. A potential collaboration effort? Might even involve DAQ since there's a possible deposition issue.

Bg

Bethany Georgoulias (she/her)

Environmental Engineer

Stormwater Program, Division of Energy, Mineral, and Land Resources

N.C. Department of Environmental Quality

919 707 3641 office

bethany.georgoulias@ncdenr.gov

512 N. Salisbury Street, Raleigh, NC 27604 (location)

1612 Mail Service Center, Raleigh, NC 27699-1612 (mailing)

Website: <http://deq.nc.gov/about/divisions/energy-mineral-land-resources/stormwater>



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From: Robin Housh <Robin.Housh@wolfspeed.com>
Sent: Monday, November 28, 2022 4:06 PM
To: Valentine, Thad <thad.valentine@ncdenr.gov>
Cc: Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>; james.azarelo@durhamnc.gov; Andy Rodak <arodak@daa.com>; Madison Paul <Madison.Paul@wolfspeed.com>
Subject: [External] Request for Relief from Advance Tier Response for Copper and Zinc

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Mr. Valentine,

Please find attached a letter requesting relief from advance tier response for copper and zinc at both Wolfspeed facilities in Durham County. Justification and supporting documentation is included.

(Hard copy to Mr. Valentine is in USPS mail.)

Please acknowledge receipt of this email.

Sincerely,



Robin Housh
Environmental Manager, EHS

4600 Silicon Drive, Durham, NC 27703
O: +1 (919) 407-6103 | M: +1 (919) 616-4614
www.wolfspeed.com

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Young, Brianna A

From: Garcia, Lauren V
Sent: Tuesday, December 13, 2022 8:30 AM
To: Young, Brianna A; Carson, Brittany; Georgoulias, Bethany
Cc: Valentine, Thad
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

Good morning! I am going through all my emails from when I was out. I definitely don't think they can justify tier relief for copper, the dust was everywhere. There was a layer of it inside the facility, so much so, that I asked if it was safe to breath it in.

Also, they are having their duct work replaced right now to improve collection efficiency. I saw evidence that they are implementing all their required BMPs on some level. The biggest issue seemed to be the copper getting tracked out by workers who are leaving doors open and running equipment through the dust.

They have drop inlets in the parking lot that drain to their bioretention cell, I don't know if anything can be added to keep the copper from getting into those?

Thanks,
Lauren

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Friday, December 9, 2022 11:25 AM
To: Carson, Brittany <brittany.carson@ncdenr.gov>; Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>
Cc: Valentine, Thad <thad.valentine@ncdenr.gov>; Garcia, Lauren V <lauran.garcia@ncdenr.gov>
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Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

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Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

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Brittany Carson
General Industrial Stormwater Permit Coordinator
Stormwater Program, Division of Energy, Mineral, and Land Resources
N.C. Department of Environmental Quality
Phone: (919) 707-3648

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Sent: Monday, November 28, 2022 5:01 PM
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Bethany Georgoulias (she/her)
Environmental Engineer
Stormwater Program, Division of Energy, Mineral, and Land Resources

N.C. Department of Environmental Quality

919 707 3641 office

bethany.georgoulias@ncdenr.gov

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Website: <http://deq.nc.gov/about/divisions/energy-mineral-land-resources/stormwater>



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From: Robin Housh <Robin.Housh@wolfspeed.com>

Sent: Monday, November 28, 2022 4:06 PM

To: Valentine, Thad <thad.valentine@ncdenr.gov>

Cc: Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>; james.azarelo@durhamnc.gov; Andy Rodak <arodak@daa.com>; Madison Paul <Madison.Paul@wolfspeed.com>

Subject: [External] Request for Relief from Advance Tier Response for Copper and Zinc

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Mr. Valentine,

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(Hard copy to Mr. Valentine is in USPS mail.)

Please acknowledge receipt of this email.

Sincerely,



Robin Housh

Environmental Manager, EHS

4600 Silicon Drive, Durham, NC 27703

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www.wolfspeed.com

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Young, Brianna A

From: Valentine, Thad
Sent: Monday, December 12, 2022 10:51 AM
To: Young, Brianna A
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

Sorry, just getting to this email. That probably will affect our response

Thad Valentine
Environmental Senior Specialist – RRO
Division of Energy, Mineral, and Land Resources – Land Quality Section
Department of Environmental Quality

919 791 4220 office
thad.valentine@ncdenr.gov

1628 Mail Service Center, Raleigh, North Carolina 27699

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Friday, December 9, 2022 4:03 PM
To: Valentine, Thad <thad.valentine@ncdenr.gov>; Carson, Brittany <brittany.carson@ncdenr.gov>; Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>
Cc: Garcia, Lauren V <lauren.garcia@ncdenr.gov>
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

Sorry for the second email. I just looked up the distance between the two facilities and they seem to be about 3 miles apart. Not sure if that affects any thinking.

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (e-mail preferred)
919-707-3647 (office)

Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612
Physical address: 512 North Salisbury Street, Raleigh, NC 27604

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From: Young, Brianna A
Sent: Friday, December 9, 2022 3:33 PM
To: Valentine, Thad <thad.valentine@ncdenr.gov>; Carson, Brittany <brittany.carson@ncdenr.gov>; Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>

Cc: Garcia, Lauren V <lauren.garcia@ncdenr.gov>

Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

SCM has many copper exceedances (basically every sample period reviewed for permit renewal). Zinc has a couple of exceedances but is not a chronic problem. Lauren's inspection report indicated the facility does have good BMPs in place, but that copper is still getting out of the facility. Is there anything I need to add to SCM's BMP permit condition? Or should we just tell them they need to look into other options to stop copper being tracked outside?

How can we assess/confirm whether air deposition is coming from SCM onto Wolfspeed (as Wolfspeed claims)? What do we need to do/review to move the SCM permit and Wolfspeed relief request forward?

Brianna Young, MS (she/her/hers)

Industrial Individual Permits Coordinator

Stormwater Permitting Program

NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

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From: Valentine, Thad <thad.valentine@ncdenr.gov>

Sent: Friday, December 9, 2022 12:47 PM

To: Young, Brianna A <Brianna.Young@ncdenr.gov>; Carson, Brittany <brittany.carson@ncdenr.gov>; Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>

Cc: Garcia, Lauren V <lauren.garcia@ncdenr.gov>

Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

If they are sampling all their outfall areas and copper is not an issue, I don't think there is anything else beyond what is required and actively being done that would need to be added. If they are getting high readings, they should have their consultant investigate other options to reduce the tracking of copper.

If the permittee that believes that the SCM facility is the cause of their high copper sample results can sample the flow coming onto their site from the SCM facility to confirm that the issue originates there, we can look at providing tier relief, if they provide their proof.

Thad Valentine

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Division of Energy, Mineral, and Land Resources – Land Quality Section

Department of Environmental Quality

919 791 4220 office

thad.valentine@ncdenr.gov

1628 Mail Service Center, Raleigh, North Carolina 27699

From: Young, Brianna A <Brianna.Young@ncdenr.gov>

Sent: Friday, December 9, 2022 11:25 AM

To: Carson, Brittany <brittany.carson@ncdenr.gov>; Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>

Cc: Valentine, Thad <thad.valentine@ncdenr.gov>; Garcia, Lauren V <lauren.garcia@ncdenr.gov>

Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

Lauren conducted an inspection this week on the SCM facility as part of the renewal. Based on the inspection report, it sounds like they have good BMPs in place but that copper does get tracked outside the processing facility from feet and tires. Is there anything we should add to the permit as another facility is citing SCM for their issues? There is already a BMP condition in the permit to address copper issues:

The Permittee shall implement the following BMPs at this facility and shall include these BMPs in the facility's SWPPP:

- (a) The Permittee shall ensure entryways and loading areas near manufacturing areas where dust track-out occurs are swept daily, and that cleaning procedures are conspicuously posted within the affected work areas.
- (b) The Permittee shall ensure routine evaluations by employee task groups of BMPs intended to reduce copper or other metal dust exposure and shall identify practices or areas in need of improvement.
- (c) The Permittee shall implement BMPs to reduce fugitive dust, including but not limited to:
 - i. Moving fork truck and sweeper maintenance indoors;
 - ii. Improving preventative maintenance for dust collectors; and
 - iii. Handling and storing glycerin in reusable containers.

For BMPs that have already been implemented, the Permittee shall ensure those practices are maintained as long as they effectively reduce fugitive dust.

- (d) The Permittee shall maintain an Operation and Maintenance (O&M) Plan for any structural BMPs, such as bioretention cells. The O&M Plan must indicate actions that shall be taken, specific criteria used for determining when those actions shall be taken, and who is responsible for those actions. The plan must clearly indicate the steps that shall be taken and who shall be responsible to restore the structural stormwater BMP systems to design specifications if a failure occurs and must include acknowledgement by the responsible party.
- (e) For areas the Permittee has determined to be primary contributions to copper or other metals in runoff from this facility, either through the Monitoring Plan approved by the Division in May 2007 or by other means, the Permittee shall continue to:
 - i. Assess BMPs intended to reduce dust release and track-out from industrial activities;
 - ii. Improve dust collection efficiency;
 - iii. Reduce other sources of copper or other metals contamination; and/or
 - iv. Capture and treat the runoff with engineered controls.

The Permittee shall maintain current information about selected BMPs, their implementation, and effectiveness in reducing metals concentrations in the Stormwater Pollution Prevention Plan. That information should include reference to DWR stormwater benchmark concentrations for total recoverable copper and zinc, currently 10 µg/L and 126 µg/L. All or part of this information should be incorporated into the Feasibility Study component of the Stormwater Management Plan (see Part B Section B-8 of Stormwater Pollution Prevention Plan requirements) as appropriate.

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Stormwater Permitting Program
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To: Carson, Brittany <brittany.carson@ncdenr.gov>; Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>
Cc: Valentine, Thad <thad.valentine@ncdenr.gov>
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

NCS000050 is currently undergoing review for renewal. It's on RRO's inspection list for the renewal, so will be interesting to see what they find. Their DMR data didn't show big zinc issues, but they have a lot of copper exceedances at all 3 of their outfalls.

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Sent: Tuesday, November 29, 2022 8:10 AM
To: Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>
Cc: Valentine, Thad <thad.valentine@ncdenr.gov>; Young, Brianna A <Brianna.Young@ncdenr.gov>
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

Thanks Bethany,

This is an interesting one. Brianna and I will collaborate on this.

Brittany Carson

General Industrial Stormwater Permit Coordinator
Stormwater Program, Division of Energy, Mineral, and Land Resources
N.C. Department of Environmental Quality
Phone: (919) 707-3648

From: Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>

Sent: Monday, November 28, 2022 5:01 PM

To: Carson, Brittany <brittany.carson@ncdenr.gov>

Cc: Valentine, Thad <thad.valentine@ncdenr.gov>; Young, Brianna A <Brianna.Young@ncdenr.gov>

Subject: FW: [External] Request for Relief from Advance Tier Response for Copper and Zinc

Greetings, Brittany – getting you and Brianna in the loop on this. I've saved the records to both GP COC files in Laserfiche.

Including Brianna because there's a reference to a potential influence from Kymera (formerly SCM Metal), which is under an individual permit. A potential collaboration effort? Might even involve DAQ since there's a possible deposition issue.

Bg

Bethany Georgoulias (she/her)

Environmental Engineer
Stormwater Program, Division of Energy, Mineral, and Land Resources
N.C. Department of Environmental Quality

919 707 3641 office

bethany.georgoulias@ncdenr.gov

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From: Robin Housh <Robin.Housh@wolfspeed.com>

Sent: Monday, November 28, 2022 4:06 PM

To: Valentine, Thad <thad.valentine@ncdenr.gov>

Cc: Georgoulias, Bethany <bethany.georgoulias@ncdenr.gov>; james.azarelo@durhamnc.gov; Andy Rodak <arodak@daa.com>; Madison Paul <Madison.Paul@wolfspeed.com>

Subject: [External] Request for Relief from Advance Tier Response for Copper and Zinc

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Mr. Valentine,

Please find attached a letter requesting relief from advance tier response for copper and zinc at both Wolfspeed facilities in Durham County. Justification and supporting documentation is included.

(Hard copy to Mr. Valentine is in USPS mail.)

Please acknowledge receipt of this email.

Sincerely,



Robin Housh
Environmental Manager, EHS

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Compliance Inspection Report

Contact Person: Westley Riscili **Title:** **Phone:** 919-287-9891

Directions to Facility:

System Classifications: SWNC,

Primary ORC:

Secondary ORC(s):

On-Site Representative(s):

Related Permits:

Inspection Date: 12/07/2022

Entry Time 09:15AM

Exit Time: 11:30AM

Primary Inspector: Lauren Garcia

Phone: 919-707-3648

Secondary Inspector(s):

Reason for Inspection: Routine

Inspection Type: Compliance Evaluation

Permit Inspection Type: Stormwater Discharge, Individual

Facility Status: Compliant Not Compliant

Question Areas:

■ Storm Water

(See attachment summary)

Permit: NCS000050

Owner - Facility: SCM Metal Products, Inc.

Inspection Date: 12/07/2022

Inspection Type : Compliance Evaluation

Reason for Visit: Routine

Inspection Summary:

Inspection was in response to permit renewal. Information included in the application is accurate. The application states that the tin manufacturing process has been discontinued. Tin manufacturing was brought back. The facility has also added some special metals manufacturing, like antimony, bismuth, nuTin, etc. Antimony and tin dust are combustable, so manufacturing is contained and there should be no transfer of the dusts around the facility. The copper manufauctuing that takes place onsite does generate a lot of dust. There is a dust residue that gets tracked outside the facility by foot and loader traffic. The facility is also partially under construction so BMPs that have previously been regularly used are not as effective, like tacky matts to prevent the copper dust being tracked outside. There is a dust collection system and the copper dust is collected in an exterior bag house. The copper dust is deposited in a bag and the bag is monitored multiple times a shift to prevent over flow. There is still a risk of exposure of the copper dust to stormwater if there is a bag malfunction. Copper dust was observed tracked outside. It should be noted that the facility has an impressive list of BMPS that are regularly implemented to deal with the dust. There are tanks and other materials stored outside at the rear of the facility. Everything appeared to be stored correctly. There are several drop inlets in the paved lot at the rear of the facility where there is storage. The drop inlets drain to an onsite bioretention cell. Water in the bioretention cell infiltrates into the ground. If there is ever any overflow, the water for the riser in the bioretention cell is pipes to outfall 1. The facility uses a street sweeper in the back parking lot to control copper dust. Used oil drums are stored under cover and in propper secondary containment in the back lot. Construction materials are also stored temporarily in this back lot.

I recomend the site map be updated to show the bag houses, outdoor storage of tanks, used oil, raw materials, etc. Continue sweeping activities to address the copper dust tracked into the back lot.

Permit: NCS000050

Owner - Facility: SCM Metal Products, Inc.

Inspection Date: 12/07/2022

Inspection Type : Compliance Evaluation

Reason for Visit: Routine

Stormwater Pollution Prevention Plan

- Does the site have a Stormwater Pollution Prevention Plan? Yes No NA NE
- # Does the Plan include a General Location (USGS) map? Yes No NA NE
- # Does the Plan include a "Narrative Description of Practices"? Yes No NA NE
- # Does the Plan include a detailed site map including outfall locations and drainage areas? Yes No NA NE
- # Does the Plan include a list of significant spills occurring during the past 3 years? Yes No NA NE
- # Has the facility evaluated feasible alternatives to current practices? Yes No NA NE
- # Does the facility provide all necessary secondary containment? Yes No NA NE
- # Does the Plan include a BMP summary? Yes No NA NE
- # Does the Plan include a Spill Prevention and Response Plan (SPRP)? Yes No NA NE
- # Does the Plan include a Preventative Maintenance and Good Housekeeping Plan? Yes No NA NE
- # Does the facility provide and document Employee Training? Yes No NA NE
- # Does the Plan include a list of Responsible Party(s)? Yes No NA NE
- # Is the Plan reviewed and updated annually? Yes No NA NE
- # Does the Plan include a Stormwater Facility Inspection Program? Yes No NA NE
- Has the Stormwater Pollution Prevention Plan been implemented? Yes No NA NE

Comment: Facility inspections are thorough and detailed. SWPPP documentation is well maintained. DMRs are up to date.

Qualitative Monitoring

- Has the facility conducted its Qualitative Monitoring? Yes No NA NE

Comment:

Analytical Monitoring

- Has the facility conducted its Analytical monitoring? Yes No NA NE

Has the facility conducted its Analytical monitoring from Vehicle Maintenance areas? Yes No NA NE

Comment:

Permit and Outfalls

- # Is a copy of the Permit and the Certificate of Coverage available at the site? Yes No NA NE
- # Were all outfalls observed during the inspection? Yes No NA NE
- # If the facility has representative outfall status, is it properly documented by the Division? Yes No NA NE
- # Has the facility evaluated all illicit (non stormwater) discharges? Yes No NA NE

Comment:

Young, Brianna A

From: Young, Brianna A
Sent: Wednesday, December 7, 2022 2:11 PM
To: Carson, Brittany
Subject: RE: [External] Request for Relief from Advance Tier Response for Copper and Zinc

What do we need to do about this one? Anything right now, or just wait for the regional office to do their inspections?

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

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N.C. Department of Environmental Quality

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To: Carson, Brittany
Cc: Valentine, Thad; Young, Brianna A
Subject: FW: [External] Request for Relief from Advance Tier Response for Copper and Zinc
Attachments: 2022-11-28 Request for Relief Letter.pdf

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November 28, 2022

Wolfspeed Inc.
4600 Silicon Drive
Durham, North Carolina, 27703

Mr. Thad Valentine, Environmental Specialist
Division Energy, Mineral, and Land Resources (DEMLR)
NC Department of Environmental Quality
3800 Barrett Drive
Raleigh, NC 27609

RE: NPDES Permits NCG030433 and NCG030541
Request for Relief from Advanced Tier Response for Copper and Zinc

Dear Mr. Valentine:

Wolfspeed, Inc. (formerly Cree, Inc.) operates under General Stormwater Permit NCG030000 for Metal Fabrication. This General Stormwater Permit was renewed effective 07-01-2021. It was revised to increase routine sampling from semi-annually to quarterly. It also rescinded Wolfspeed's Letter of Relief from Advanced Tier Response for Copper and Zinc granted by DEMLR on 09-24-2014. Due to the increased sampling frequency and the lack of relief from advanced tier response for copper and zinc exceedances, Wolfspeed now has several stormwater outfalls at both locations requiring Tier III response.

Wolfspeed does not believe the elevated copper and zinc levels originate from the Silicon Drive (DUR) or Cornwallis Road (RTP) locations based on the following:

- Kymera International (formerly SCM Metal Products, Inc.) is located at 2601 Weck Drive, Research Triangle Park, NC 27709. The facility smelts copper which could be emitting unregulated concentrations of copper and zinc to the atmosphere, as reported in their TRI annual report. The copper and zinc may then be atmospherically deposited to surrounding surface areas such as roofs and parking lots and "washed" to stormwater outfalls during rain events.
- Copper and zinc compounds are used in wet manufacturing processes at the DUR site. However, the processes are contained within buildings with no impact to stormwater drains or outfalls.
- Copper and zinc compounds are not used at the RTP site.
- Elevated copper and zinc levels have consistently exceeded the benchmark values in several of the industrial stormwater discharge outfalls between the two sites. Table 1 and Table 2 (attached) present the history of copper and zinc exceedances.
- SDO-2, SDO-5, WOLF-1, and WOLF-4 receive the majority of flows from building roofs and paved surfaces at the respective sites. The copper and zinc values for these outfalls are indicative of atmospheric deposition.

- Possible mitigation measures are costly and are not guaranteed to reduce the copper and zinc values below benchmark.

In summary, Wolfspeed does not see a benefit to continue to perform the costly monthly monitoring at both Wolfspeed facilities beyond the required quarterly occasions or implement costly mitigation measures.

Based on these reasons and the previous *Relief from Advanced Tier Response for Copper and Zinc* granted by DEMLR, Wolfspeed respectfully requests to resume quarterly sampling stormwater analytical monitoring for the remainder of our permit terms for the copper and zinc parameters. Wolfspeed will continue to perform quarterly qualitative monitoring along with the quarterly analytical monitoring for all required parameter, and Wolfspeed will continue to follow the Tier I – Tier III process should Wolfspeed's sampling results ever exceed another parameter besides copper and zinc.

Please contact me at 919-407-6103 should you require additional information.

Regards,



Robin L. Housh
Environmental Manager
Wolfspeed, Inc.

Enclosures

- August 4, 2014 Analytical Monitoring Request and Response to August 1, 2014 Meeting Letter
- September 24, 2014 Letter of Relief from Advanced Tier Response for Copper and Zinc

cc: Bethany Geogoulias, NC DEQ DEMLR Central Office
Jim Azarelo, City of Durham Stormwater Inspector
Andy Rodak, TRC Stormwater Consultant

Table 1. History of Silicon Drive Copper and Zinc Exceedances

	SDO-1	SDO-2	SDO-3	SDO-4	SDO-5	SDO-6	SDO-7
Date	Copper	Zinc	Copper	Zinc	Copper	Zinc	Copper
5/14/2014	0.034	0.156	0.021	0.136	0.034	0.157	0.011
12/16/2014	0.011	0.076	0.013	0.159	No Flow	0.006	0.128
6/25/2015	0.01	0.094	0.009	0.15	0.012	0.049	0.011
12/17/2015	0.008	0.217	0.022	0.338	0.01	0.063	0.01
6/28/2016	0.008	0.33	0.033	0.512	0.015	0.047	0.03
12/4/2016	0.00785	0.218	0.0099	0.17	No Flow	No Flow	0.02
6/24/2017	<0.007	0.187	0.0104	0.113	No Flow	No Flow	0.24
12/8/2017	0.0166	0.159	0.0153	0.245	No Flow	No Flow	0.0185
4/24/2018	0.0102	0.0981	0.0218	0.175	0.0112	0.0352	No Flow
11/12/2018	<0.007	0.0602	<0.007	0.103	<0.007	0.0096	<0.007
6/5/2019	0.0112	0.158	0.012	0.18	No Flow	No Flow	0.0246
11/18/2019	0.008	0.077	0.015	0.177	No Flow	No Flow	0.016
3/31/2021	0.031	0.184	0.0566	0.436	No Flow	No Flow	0.0321
9/22/2021	0.0073	0.105	0.0105	0.15	No Flow	No Flow	0.0332
1/20/2022	0.00522	0.0774	0.013	0.185	0.007	0.108	No Flow
6/27/2022			0.0264	0.372	No Flow	No Flow	0.0265
9/30/2022	0.00618	0.0925	0.0122	0.191	0.00831	0.039	No Flow

Table 2. History of Cornwallis Road Copper and Zinc Exceedances

	WOLF-1	WOLF-2	WOLF-3	WOLF-4	WOLF-5
Date	Copper	Zinc	Copper	Zinc	Copper
5/14/2014	ftc	0.04	0.009	0.018 0.01	0.021
12/16/2014	0.015	0.087	0.006	0.023	No Flow 0.01
6/25/2015	0.033	0.109	0.016	0.04	No Flow 0.021
12/17/2015	0.036	0.695	0.004	0.01	No Flow 0.002
6/28/2016	0.045	0.202	0.015 0.012	0.025	0.072 0.022
12/4/2016	0.044	0.236	No Flow	No Flow	0.0472
9/27/2017	0.0487	0.308	No Flow	No Flow	0.0167
12/8/2017	0.0238	0.141	0.0086	0.022	0.0074 <0.002 0.118
4/18/2018	0.015	0.0681	0.0138	0.0323	0.0535 0.609
11/17/2018	0.013	0.104	0.00824	0.028	0.0852 0.176
6/20/2019	0.0176	0.168	0.0054	0.019	No Flow 0.0114
11/18/2019	0.024	0.151	0.009	0.027	No Flow 0.013
3/31/2021	0.0271	0.106	No Flow	No Flow	<0.005 0.0313
9/22/2021	0.0114	0.0559	No Flow	No Flow	0.00965 0.105
1/20/2022	0.0134	0.116	0.0101	0.024	0.0075 0.114
6/27/2022	0.0422	0.291	No Flow	No Flow	0.0189 0.455
9/30/2022	0.0111	0.101	0.0101	0.0196	No Flow 0.004 0.0794
					0.007 0.0345



4600 Silicon Drive, Durham, NC 27703 USA
Main: (919) 407-5300

August 4, 2014

Mr. David Parnell, Environmental Senior Specialist, Water Quality, Surface Water Protection Section, North Carolina Department of Environment and Natural Resources, 3800 Barrett Drive, Raleigh, NC 27760

Attn: Mr. David Parnell
Environmental Senior Specialist
Water Quality, Surface Water Protection Section
North Carolina Department of Environment and Natural Resources
3800 Barrett Drive
Raleigh, NC 27760

RE: NPDES Permits NCG030433 and NCG030541
Analytical Monitoring Request and Response to August 1, 2014 Meeting

Dear Mr. Parnell:

It was a pleasure meeting with you and Bethany Georgoulias to discuss options for Cree's stormwater monitoring for copper and zinc. This letter is to follow up the verbal request made during our meeting on Friday, August 1, 2014 at NCDENR offices at 3800 Barrett Drive.

During the meeting Cree presented reasons why the Cree-Durham and Cree-RTP (Research Triangle Park) facilities, which have both reached Tier Three status under Part II Section B of our NPDES permits NCG030433 and NCG030541, should return to semi-annual stormwater analytical monitoring from Tier Two monthly monitoring. Elevated copper and zinc levels, we feel, are not originating from the Cree-Durham or Cree-RTP facilities based on the following objective evidence:

- No copper or zinc compounds are used in Cree's manufacturing processes at either location which could contribute to these levels;
- Cree has performed an extensive review of its buildings and operational areas and no significant sources of copper or zinc have been identified at either Cree facility that could be contributing to these levels;
- Elevated copper and zinc levels have consistently exceeded the benchmark values in all seven Cree-Durham industrial stormwater discharge outfalls and all five Cree-RTP industrial stormwater discharge outfalls, even though several of these outfalls have on-site drainage areas that contain no buildings, equipment, vehicles, or other possible sources of copper and zinc.

Further, Cree is aware of a copper smelting plant in the vicinity that could be contributing to these elevated copper and zinc levels. That facility should be taken into consideration by NCDENR as a potential source of copper and zinc due to atmospheric deposition.

In summary, Cree does not see a benefit to continue to perform the costly monthly monitoring at both Cree facilities beyond the required four occasions already completed.

Based on these reasons and on the technical discussion held during our meeting on August 1, Cree formally asks to resume semi-annual stormwater analytical monitoring for the remainder of our permit terms for the zinc and copper parameters. Cree will continue to perform semi-annual qualitative monitoring along with the semi-annual analytical monitoring for all required parameters, and Cree will continue to follow the Tier One-Tier Three process should Cree's sampling results ever exceed another parameter besides copper and zinc. If NCDENR agrees, and we are able to perform analytical monitoring of stormwater discharges this next month, we also respectfully request that the next samples collected be allowed to satisfy our upcoming fall 2014 reporting period.

In addition, during the August 1, 2014 meeting with you Cree asked for a reduction in the number of outfalls that require analytical monitoring at both the Cree-Durham and Cree-RTP facilities based on representative outfall status and in a few cases insignificant drainage from certain outfalls.

Cree will plan to submit a separate formal request for this reduction to NCDENR in the near future. In the interim please advise Cree on our above request to return to semi-annual monitoring immediately for both Cree-Durham and Cree-RTP facilities.

Please contact me at 919-407-6101 if you need additional information.

Sincerely,

Donna Lazzari
Environmental Manager
Cree, Inc.

Enclosures

cc: Bethany Georgoulias, NCDENR Central Office
Lloyd Smith, Cree, Inc.
Dan O'Connor, PE, URS Stormwater Consultant



North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

John E. Skvarla, III
Secretary

September 24, 2014

Ms. Donna Lazzari, Environmental Manager
CREE
4600 Silicon Drive
Durham, North Carolina 27703

Subject: CREE – Silicon Drive
NPDES Permit NCG030433
Relief from Advanced Tier Response
Durham County

Dear Ms. Lazzari:

In response to your discussions with NCDENR Land Quality Section staff, concerning multiple exceedances of the benchmark values for zinc and copper, Dave Parnell of the Land Quality Section - Stormwater staff, conducted a compliance evaluation inspection (CEI) on April 8, 2014. The inspection was conducted to determine compliance with the conditions of your NPDES NCG030433 Stormwater Permit and to discuss any actions that have been or could be taken to identify and eliminate potential sources of Zinc and Copper related to facility operations.

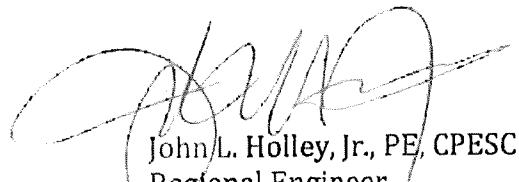
Keep in mind that benchmark exceedances are not limit violations or violations of permit conditions; however, you are obligated to follow the tiered response actions outlined in your permit. At the time of the inspection, your facility was found to be in compliance with the tiered response actions and other conditions of the permit. During the inspection, you are reported to have relayed to Mr. Parnell that you have been unable to determine the source of the higher levels of the metals, found at the Silicon Drive outfalls. It is notable in this case, that CREE does not use copper or zinc in the manufacturing processes and the facility has conducted extensive reviews of your site for external sources of the metals. Your diligence in attempting to determine and eliminate the zinc source and your continued communication with Raleigh Regional Office staff is commendable and is documented back to the April 8 compliance evaluation inspection.

Based on the aforementioned items, DENR Land Quality Section is granting regulatory relief in the form of a collapsed Tier 2-Tier 3 response. Upon receipt of this letter, CREE - Silicon Drive, may resume the permit specified semi-annual analytical monitoring for the remainder of the current permit term - which ends October 31, 2017. This decision applies only to the zinc and copper benchmarks. **A benchmark exceedance of any other parameter listed in your permit will trigger the tiered response actions as described in your permit.**

You must notify this office, in writing, within five business days if you become aware of any significant source of zinc or copper at your facility, that has the potential to be exposed to stormwater. The relief granted in this letter is contingent upon the current industrial practices at CREE. If industrial practices change and zinc & copper does become a significant stormwater exposure risk, then this office reserves the right to withdraw this decision and reinstate the permit specified tiered response or other actions that may be warranted by the new set of circumstances.

Retain and append this letter to your Stormwater Pollution Prevention Plan (SPPP) or permit. Should you have questions or comments regarding the CEI or this letter, please contact Dave Parnell at (919) 791-4200 or david.parnell@ncdenr.gov.

Sincerely,



John L. Holley, Jr., PE, CPESC
Regional Engineer
Raleigh Regional Office

cc: Stormwater Permitting Program Files
DEMRL Raleigh Regional Office Stormwater Files

Young, Brianna A

From: Westley Riscili <westley.riscili@kymerainternational.com>
Sent: Tuesday, October 25, 2022 10:14 AM
To: Young, Brianna A
Subject: RE: [External] SCM Metal Products, Inc. update
Attachments: New Location of the Wastewater Process tank.pdf

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Good morning, Brianna,

The process tank that is being moved outside is part of our non-process wastewater pretreatment system. This is similar to the large wastewater storage tank that receives wastewater from our employee shower drains, restroom sinks, and laboratory sinks. The water from these drains is collected in the large wastewater storage tank, then pumped into the process tank. Wastewater from the smaller process tank is then run through a series of 72 membrane filters, which is then run through a resin bed filter prior to being discharged to the sanitary sewer. The location of the process tank will be in close proximity to the existing large wastewater storage tank. This tank is located inside of a concrete secondary containment. I have attached a site map showing this location. Please let me know if this will suffice, or if you would prefer a satellite image showing this location.

Best regards,

Westley Riscili, CQIA – N.A. Environmental Compliance Manager
Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA
Tel +1 (919) 544.8090
Direct +1 (919) 287.9891
Mobile +1 (716) 307.3191
westley.riscili@kymerainternational.com

ACuPowder | AmeriTi Manufacturing | ECKA Granules | Innobraze | Reading Alloys | SCM Metal Products | Telex Metals
www.kymerainternational.com

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Tuesday, October 25, 2022 9:45 AM
To: Westley Riscili <westley.riscili@kymerainternational.com>
Subject: RE: [External] SCM Metal Products, Inc. update

[[EXTERNAL EMAIL]]

Hello Westley,

Can you please provide more information on the process tank that is being moved outside? What is being stored in this tank? Please point on the map where the exact location will be.

Thank you,

Brianna Young, MS (she/her/hers)

Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (e-mail preferred)
919-707-3647 (office)

Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612
Physical address: 512 North Salisbury Street, Raleigh, NC 27604

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.

Based on the current guidance to minimize the spread of COVID-19, the Department of Environmental Quality has adjusted operations to protect the health and safety of the staff and public. Please check with the appropriate staff before visiting our offices, as we may be able to handle your requests by phone or email. We appreciate your patience as we continue to serve the public during this challenging time.

From: Westley Riscili <westley.riscili@kymerainternational.com>
Sent: Friday, October 7, 2022 4:41 PM
To: Young, Brianna A <Brianna.Young@ncdenr.gov>
Subject: [External] SCM Metal Products, Inc. update

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Hi Brianna,

Please find attached an updated site map showing the locations of the new processes, as well as significant changes in industrial activities. Please let me know if you have any questions.

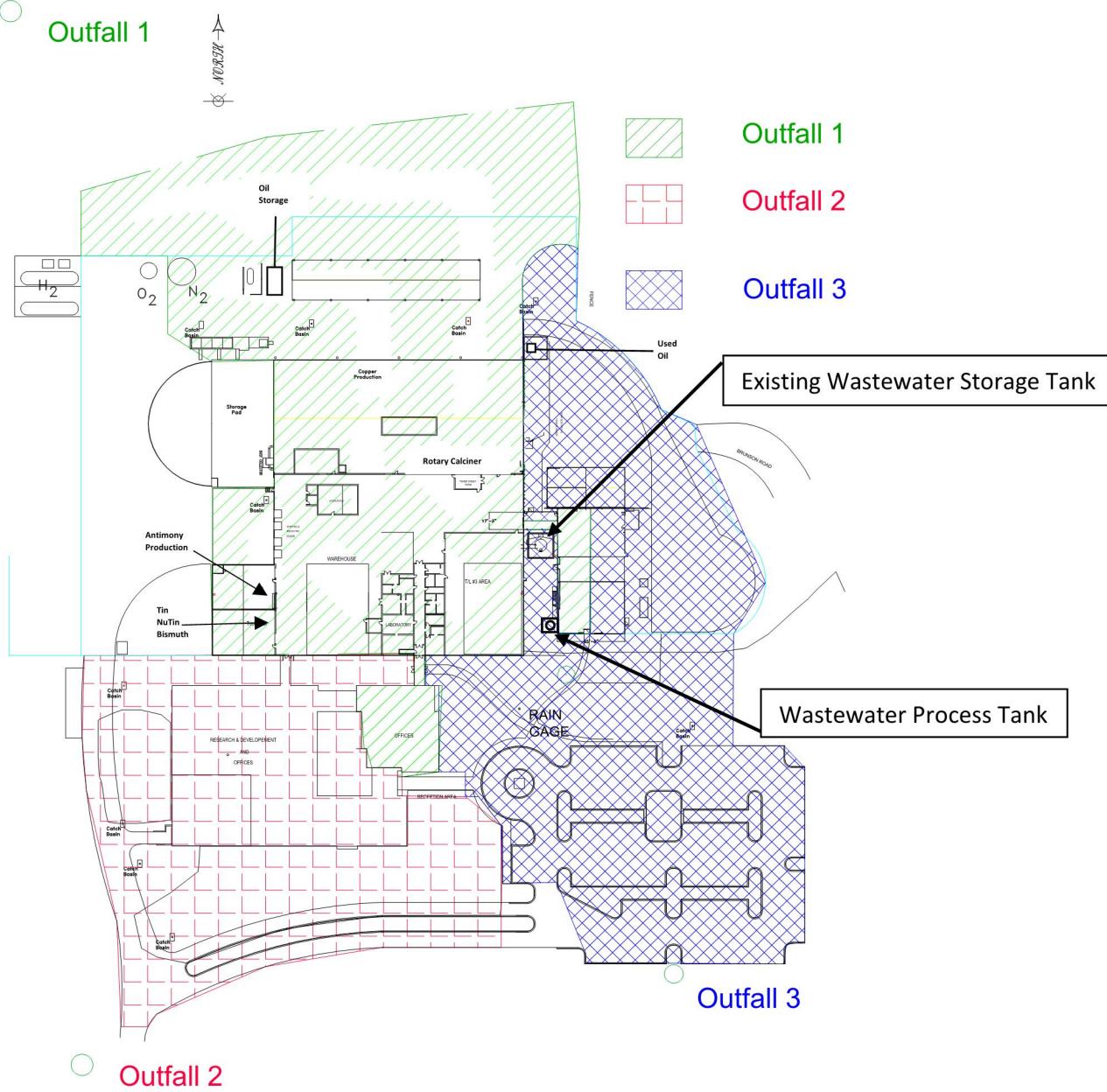
Regards,

Westley Riscili, CQIA – N.A. Environmental Compliance Manager
Kymera International

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Outfall 1



Outfall 1

Outfall 2

Outfall 3

Existing Wastewater Storage Tank

Wastewater Process Tank

Outfall 3

Outfall 2



SIGNIFICANT CHANGES IN INDUSTRIAL ACTIVITIES – Updated 10/7/2022

In March of 2013, the Brazing Manufacturing Process was moved into the main facility from an outside building. This relocation of this process has helped eliminate the transfer of materials between buildings.

In December of 2013, the Tin Manufacturing Process was discontinued at the RTP facility. This process was moved to another SCM Manufacturing Plant in Union, New Jersey.

Most additives are stored indoors, with the exception of some drums of flammable liquids, which SCM is required to store outdoors by the fire department. These drums are stored on secondary containment pallets and are covered with tarps.

UPDATE SINCE ORIGINAL PERMIT RENEWAL SUBMISSION IN 2016:

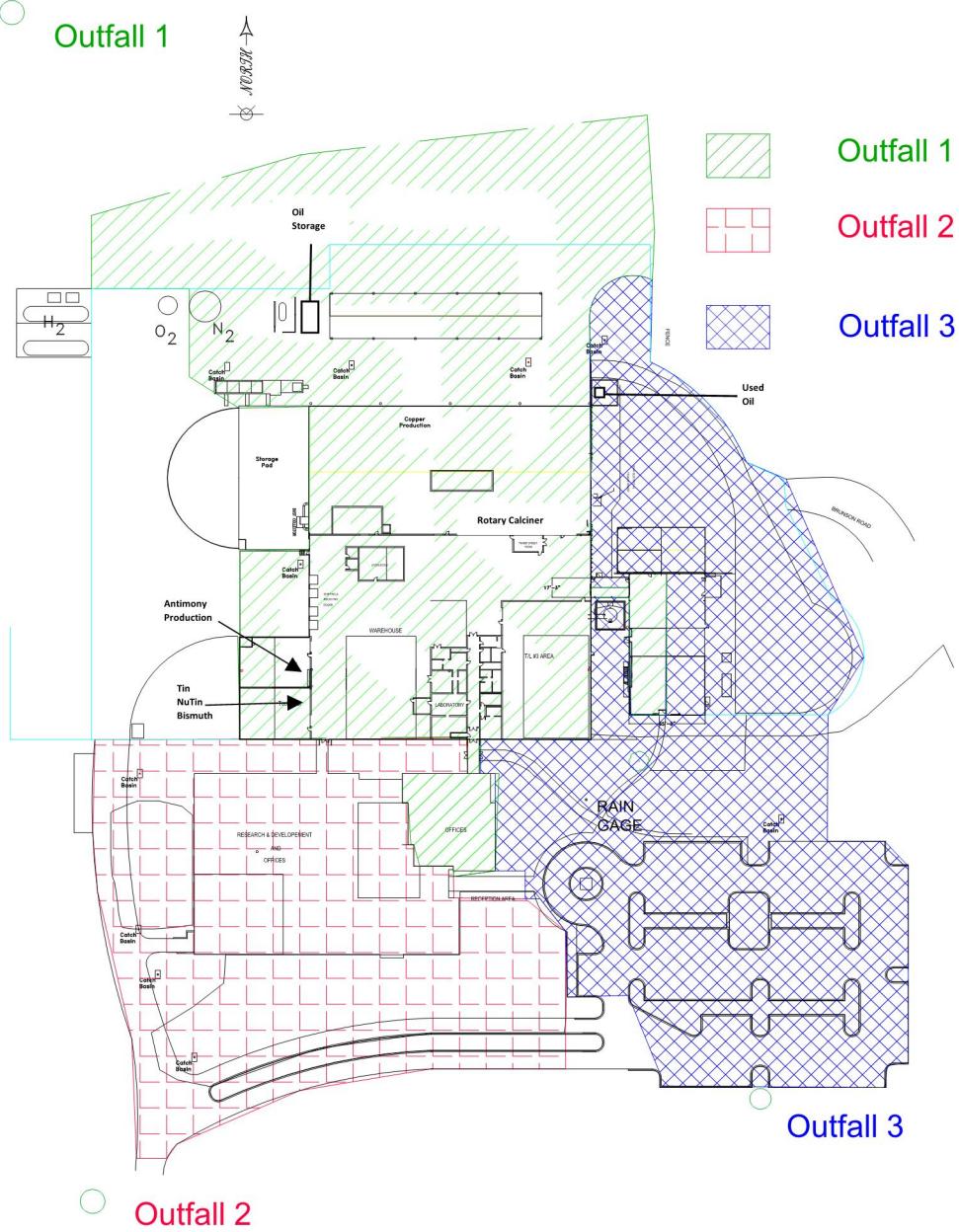
In April of 2019, the Antimony process began operations. This process involves crushing antimony ingots into powder form through a series of jaw crushers, mills, and screening activities. This is a dry process that is located inside of the main building near the warehouse loading docks.

In December of 2021, the Catalyst process that was located in the TL#3 room was decommissioned and all equipment was removed.

In September of 2022, the Tin Manufacturing Process was recommissioned, located in the room next to the Antimony process. The process is currently under Engineering control and has not been handed over to operations. This is expected to occur in the next week. An additional process for the production of Bismuth and NuTin Powder is also being commissioned in this room. Bismuth production will include the melting of bismuth ingot and the air atomization of the molten metal to create bismuth powder, and screening operations. The NuTin process will include the melting and air atomization of a 90/10 tin/copper mixture. The resulting powder will include dry handling operations such as screening. Activities for all of these processes will occur indoors.

There are plans to install a water copper process in the main production area. In addition, a continuous belt reduction furnace is planned to be installed in the previous TL#3 room. This is expected to occur in the 4th quarter of 2022. As a part of this construction, the wastewater pretreatment system been moved to the Brazing Manufacturing Process area. This will included moving the process tank outside, near the current storage tank. This tank will be installed inside of a secondary containment bunker.

Outfall 1



Outfall 1

Outfall 2

Outfall 3

Outfall 2

Young, Brianna A

From: Westley Riscili <westley.riscili@kymerainternational.com>
Sent: Monday, September 19, 2022 12:22 PM
To: Young, Brianna A
Cc: Jonathan White
Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)
Attachments: Outfall areas.pdf; Questions.pdf; Summary of Stormwater Analytical Results for 2022 Permit Renewal Review.xlsx

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Hi Brianna,

I have attached a map of our facility areas, describing which areas discharge to which outfalls. Also included are the responses to your questions, and the summary of analytical results since the implementation of the current permit. I did update the contact information as requested. Please confirm that you have received this information. I am working on updating the renewal application as requested. I will provide this information as soon as possible. Please let me know if you have any additional questions regarding the information that I have provided to you in this email. Thank you for your time.

Best regards,

Westley Riscili, CQIA – N.A. Environmental Compliance Manager
Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA
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westley.riscili@kymerainternational.com

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www.kymerainternational.com

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Friday, September 16, 2022 11:26 AM
To: Westley Riscili <westley.riscili@kymerainternational.com>
Cc: Jonathan White <jonathan.white@kymerainternational.com>
Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

[[EXTERNAL EMAIL]]

If you already have access to eDMR, you will not need to do anything further for this renewal regarding that. However, eDMR is a separate database from our internal database. In order to make sure our internal database is up to date, please run the [Stormwater Permit Summary Report](#) and update the contact information as needed.

Facility/Company name or ownership: [Name/Ownership Change Form](#)

Owner Affiliation (Legally responsible person; i.e., someone with the company who is designated to represent the company per signatory requirements or another authorized representative): [Permit Contact Update Request Form](#)

Delegation of Signature Authority (DOSA): [Permit Contact Update Request Form](#)

Billing contact: [Permit Contact Update Request Form](#)

Permit contact: [Permit Contact Update Request Form](#)

Facility contact: [Permit Contact Update Request Form](#)

Facility address **only**: Email [Bethany Georgoulias](#)

Stormwater outfall information: Email [Bethany Georgoulias](#)

Visit the [eDMR Six Steps website](#) and complete Steps 1 and 2.

Pay outstanding permit fees: [Stormwater ePayment website](#)

Thank you,

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (e-mail preferred)
919-707-3647 (office)

Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612

Physical address: 512 North Salisbury Street, Raleigh, NC 27604

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.

Based on the current guidance to minimize the spread of COVID-19, the Department of Environmental Quality has adjusted operations to protect the health and safety of the staff and public. Please check with the appropriate staff before visiting our offices, as we may be able to handle your requests by phone or email. We appreciate your patience as we continue to serve the public during this challenging time.

From: Westley Riscili <westley.riscili@kymerainternational.com>
Sent: Friday, September 16, 2022 10:55 AM
To: Young, Brianna A <Brianna.Young@ncdenr.gov>
Cc: Jonathan White <jonathan.white@kymerainternational.com>
Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Hi Brianna,

If I previously have been set up for eDMR submissions, do I need to complete this exercise again?

Regards,

Westley Riscili, CQIA – N.A. Environmental Compliance Manager
Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA

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westley.riscili@kymerainternational.com

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www.kymerainternational.com

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Tuesday, September 13, 2022 10:57 AM
To: Westley Riscili <westley.riscili@kymerainternational.com>
Cc: Jonathan White <jonathan.white@kymerainternational.com>
Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

[[EXTERNAL EMAIL]]

Westley,

Thank you for the quick response. I received a bounce back on Jill Spaulding's email address on my original send. As you gather the data, please make sure to also follow the links in the previous email to update the contacts for this permit so our database is accurate. Please let me know if you have any questions as you work through the request.

Thank you,

Brianna Young, MS (she/her)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (e-mail preferred)
919-707-3647 (office)

Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612
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From: Westley Riscili <westley.riscili@kymerainternational.com>
Sent: Tuesday, September 13, 2022 10:38 AM
To: Young, Brianna A <Brianna.Young@ncdenr.gov>
Cc: Jonathan White <jonathan.white@kymerainternational.com>
Subject: [External] RE: SCM Metal Products, Inc. (NCS000050)

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Good morning Brianna,

I am happy to assist with the requested information. Since our submission of this renewal, there have been some changes at the facility. Jonathan White (in copy here) is the new Operations Manager. I am still the technical contact for the facility. We are currently in the process of adding additional processes at the facility. These are both dry processes in which all handling and processing activities occur indoors. These include the processing of tin and bismuth. None of these processes should have an impact on the stormwater quality for this facility. Construction for these processes is currently underway. The next phase of construction will also include some new processing equipment for copper. All activities for this process will also occur indoors. If you have any questions while I gather the requested information, please do not hesitate to ask.

Best regards,

Westley Riscili, CQIA – N.A. Environmental Compliance Manager
Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA
Tel +1 (919) 544.8090

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westley.riscili@kymerainternational.com

ACuPowder | AmeriTi Manufacturing | ECKA Granules | Innobraze | Reading Alloys | SCM Metal Products | Telex Metals
www.kymerainternational.com

From: Barton White <barton.white@kymerainternational.com>

Sent: Monday, September 12, 2022 5:51 PM

To: Westley Riscili <westley.riscili@kymerainternational.com>; Gabor Szentivanyi <Gabor.Szentivanyi@kymerainternational.com>

Subject: Fwd: SCM Metal Products, Inc. (NCS000050)

Not sure if this is Spam but it looks legit

From: Young, Brianna A <Brianna.Young@ncdenr.gov>

Sent: Monday, September 12, 2022 4:06 PM

To: jspaulding@scmmetals.com <jspaulding@scmmetals.com>

Cc: Barton White <barton.white@kymerainternational.com>

Subject: SCM Metal Products, Inc. (NCS000050)

[[EXTERNAL EMAIL]]

Good afternoon,

I am working on renewing the individual stormwater permit for the SCM Metal Products, Inc. (NCS000050). I need additional information in order to 1) confirm that the information I have is correct and 2) make sure the permit adequately serves the needs of the facility. Please provide the following:

- Confirmation on number of outfalls and associated coordinates;
- Confirmation of the receiving stream for each outfall;
- Description of industrial activity in each drainage area;
- SIC (NAICS) code;
- An electronic spreadsheet summarizing all of the monitoring data that has been collected since the effective date of the current permit;
- Verification that the information in the renewal application is still complete and correct; and
- An explanation of any operational changes since the renewal application was submitted.

Enter your stormwater permit number into the [Stormwater Permit Summary Report](#) and you will see a form that includes the address of the facility, contact information for the permit, and the regulated stormwater outfall(s) for the facility. Please review the facility information to make sure it is correct. Information can be updated using the links provided below, where applicable:

Facility/Company name or ownership: [Name/Ownership Change Form](#)

Owner Affiliation (Legally responsible person; i.e., someone with the company who is designated to represent the company per signatory requirements or another authorized representative): [Permit Contact Update Request Form](#)

Delegation of Signature Authority (DOSA): [Permit Contact Update Request Form](#)

Billing contact: [Permit Contact Update Request Form](#)

Permit contact: [Permit Contact Update Request Form](#)

Facility contact: [Permit Contact Update Request Form](#)

Facility address **only**: Email [Bethany Georgoulias](#)

Stormwater outfall information: Email [Bethany Georgoulias](#)

Visit the [eDMR Six Steps website](#) and complete Steps 1 and 2.

Pay outstanding permit fees: [Stormwater ePayment website](#)

Once I have the above listed information, I can continue my review. You will receive a draft permit for a 30-day comment period. During this time we will be able to address any comments or concerns you have. During the same 30-day period, the draft will be sent to a Regional Office staff member for review as well as out to public notice. Once all comments and concerns are addressed, you may be issued a final permit.

Please contact me if you have any questions.

Thank you,

Brianna Young, MS (she/her)

Industrial Individual Permits Coordinator

Stormwater Permitting Program

NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (e-mail preferred)

919-707-3647 (office)

Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612

Physical address: 512 North Salisbury Street, Raleigh, NC 27604

Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.

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the intended recipient is prohibited. If you received this message in error, please contact the sender and destroy any copies of this correspondence and the information within.

Young, Brianna A

From: Westley Riscili <westley.riscili@kymerainternational.com>
Sent: Thursday, September 22, 2022 8:53 AM
To: Young, Brianna A
Cc: Jonathan White
Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Hi Brianna,

No problem. I had the same issue when I initially set up our EDMR. Outfall #3 was not listed for reporting. However, when I contacted Bethany we were able to get it on there. Please let me know if you need any additional information.

Best regards,

Westley Riscili, CQIA – N.A. Environmental Compliance Manager
Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA
Tel +1 (919) 544.8090
Direct +1 (919) 287.9891
Mobile +1 (716) 307.3191
westley.riscili@kymerainternational.com

ACuPowder | AmeriTi Manufacturing | ECKA Granules | Innobraze | Reading Alloys | SCM Metal Products | Telex Metals
www.kymerainternational.com

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Thursday, September 22, 2022 8:42 AM
To: Westley Riscili <westley.riscili@kymerainternational.com>
Cc: Jonathan White <jonathan.white@kymerainternational.com>
Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

[[EXTERNAL EMAIL]]

Thank you for this information. I will add it to our permit files.

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

[\(e-mail preferred\)](mailto:Brianna.Young@ncdenr.gov)
919-707-3647 (office)

Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612
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From: Westley Riscili <westley.riscili@kymerainternational.com>

Sent: Wednesday, September 21, 2022 4:49 PM

To: Young, Brianna A <Brianna.Young@ncdenr.gov>

Cc: Jonathan White <jonathan.white@kymerainternational.com>

Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Hi Brianna,

Outfall #3 was not added prior to 2007. It was added in September of 2011. The first stormwater sample collected for Outfall #3 was on 9/30/2011.



Chain of Custody

Tribest W.O. # 1110-00348

- 9701 Conference Drive, Raleigh, NC 27607
ph: (919) 434-4984, fax: (919) 834-6497
NCWW Cert#67 NCDW Cert#37731
 - 6624 Gordon Road, Unit G, Wilmington, NC 28411
ph: (910) 763-9793, fax: (910) 343-9688
NCWW Cert#75 NCDW Cert#37721
 - 6300 Ramada Dr., Suite C2, Clemmons, NC 27012
ph: (336) 768-7846, fax: (336) 766-2514
NCWW Cert#103 NCDW Cert#37733

Report Results To:

Company: SCM Metal Products
Address: P.O. Box 12166
RTP, NC 27713
Altin: GERALD HENCKEL
Phone: (919) 544-287-9877
Fax: (919) 544-8332

Sampled by (signature): 

Bill To:
Sam

Project Reference:

Project Number:

Purchase Order #: 05-42561

Standard Report Delivery

Rush Report Delivery (extra charges)

***Rush projects are subject to prior approval by the laboratory**

Requested Due Date:

Relinquished by (signature) <i>Sergeant R. A. Lamond</i>	Received by (signature) <i>R. A. Lamond</i>	Date 10/5/11	Time 12:30
Relinquished by (signature) <i>R. A. Lamond</i>	Received by (signature) <i>R. A. Lamond</i>	Date 10/5/11	Time 12:30
Relinquished by (signature)	Received by (signature)	Date	Time

Receipt Conditions (1 ab 110a Only)

■ 4°C Temp: %

Res. Chlorine

Absent Present n/a

Final summary, ≤ 23

Yes No n/a

Base present >122

Yes No n/a

10-5

10-3.

A

10^{-5}

Best regards,

Westley Riscili, CQIA – N.A. Environmental Compliance Manager
Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA

Tel +1 (919) 544.8090

Direct +1 (919) 287.9891

Mobile +1 (716) 307.3191

westley.riscili@kymerainternational.com

ACuPowder | AmeriTi Manufacturing | ECKA Granules | Innobraze | Reading Alloys | SCM Metal Products | Telex Metals
www.kymerainternational.com

From: Young, Brianna A <Brianna.Young@ncdenr.gov>

Sent: Wednesday, September 21, 2022 4:05 PM

To: Westley Riscili <westley.riscili@kymerainternational.com>

Cc: Jonathan White <jonathan.white@kymerainternational.com>

Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

[[EXTERNAL EMAIL]]

Thank you for the quick response. If you are able to easily find when outfall SW003 was added to the site, that would be great. Otherwise, knowing it has been in place since at least 2007 is very helpful.

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

[\(e-mail preferred\)](mailto:Brianna.Young@ncdenr.gov)
919-707-3647 (office)

Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612

Physical address: 512 North Salisbury Street, Raleigh, NC 27604

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From: Westley Riscili <westley.riscili@kymerainternational.com>

Sent: Wednesday, September 21, 2022 3:23 PM

To: Young, Brianna A <Brianna.Young@ncdenr.gov>

Cc: Jonathan White <jonathan.white@kymerainternational.com>

Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to [Report Spam](#).

Hi Brianna,

There is an outdoor H2 storage tank located at the NW corner of the facilities perimeter fence, inside of a fenced area within the perimeter fence.

A 36" pipe runs approximately 400' N from the underdrain of the bioretention cell towards the property line. The pipe ends at a weir that then discharges down a riprap channel. Point at which the water leaves the weir is outfall #1.

I will need to review my archive to determine the date of installation for Outfall #3. This outfall is described in our SWPPP as far back as 2007. It has been in place prior to that.

Regards,

Westley Riscili, CQIA – N.A. Environmental Compliance Manager
Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA
Tel +1 (919) 544.8090

Direct +1 (919) 287.9891

Mobile +1 (716) 307.3191

westley.riscili@kymerainternational.com

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www.kymerainternational.com

From: Young, Brianna A <Brianna.Young@ncdenr.gov>

Sent: Wednesday, September 21, 2022 2:48 PM

To: Westley Riscili <westley.riscili@kymerainternational.com>

Cc: Jonathan White <jonathan.white@kymerainternational.com>

Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

[[EXTERNAL EMAIL]]

Westley,

I have a few follow-up questions.

- 1) Are there H2 storage tanks outdoors on the property?
- 2) Does outfall SW001 discharge from the bioretention pond?
- 3) When was Outfall SW003 identified at/added to the facility? Our permit files only discuss outfalls SW001 and SW002.

Thank you,

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

[\(e-mail preferred\)](mailto:Brianna.Young@ncdenr.gov)
919-707-3647 (office)

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From: Young, Brianna A
Sent: Tuesday, September 20, 2022 8:46 AM
To: Westley Riscili <westley.riscili@kymerainternational.com>
Cc: Jonathan White <jonathan.white@kymerainternational.com>
Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

Westley,

Thank you for providing this information. I will reach out with any questions once I review everything. Please let me know if you have any questions as you work on updating the application.

Thank you,

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (e-mail preferred)
919-707-3647 (office)

Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612
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From: Westley Riscili <westley.riscili@kymerainternational.com>
Sent: Monday, September 19, 2022 12:22 PM
To: Young, Brianna A <Brianna.Young@ncdenr.gov>
Cc: Jonathan White <jonathan.white@kymerainternational.com>
Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

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Hi Brianna,

I have attached a map of our facility areas, describing which areas discharge to which outfalls. Also included are the responses to your questions, and the summary of analytical results since the implementation of the current permit. I did

update the contact information as requested. Please confirm that you have received this information. I am working on updating the renewal application as requested. I will provide this information as soon as possible. Please let me know if you have any additional questions regarding the information that I have provided to you in this email. Thank you for your time.

Best regards,

Westley Riscili, CQIA – N.A. Environmental Compliance Manager
Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA
Tel +1 (919).544.8090
Direct +1 (919).287.9891
Mobile +1 (716).307.3191
westley.riscili@kymerainternational.com

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www.kymerainternational.com

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Friday, September 16, 2022 11:26 AM
To: Westley Riscili <westley.riscili@kymerainternational.com>
Cc: Jonathan White <jonathan.white@kymerainternational.com>
Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

[[EXTERNAL EMAIL]]

If you already have access to eDMR, you will not need to do anything further for this renewal regarding that. However, eDMR is a separate database from our internal database. In order to make sure our internal database is up to date, please run the [Stormwater Permit Summary Report](#) and update the contact information as needed.

Facility/Company name or ownership: [Name/Ownership Change Form](#)

Owner Affiliation (Legally responsible person; i.e., someone with the company who is designated to represent the company per signatory requirements or another authorized representative): [Permit Contact Update Request Form](#)

Delegation of Signature Authority (DOSA): [Permit Contact Update Request Form](#)

Billing contact: [Permit Contact Update Request Form](#)

Permit contact: [Permit Contact Update Request Form](#)

Facility contact: [Permit Contact Update Request Form](#)

Facility address **only**: Email [Bethany Georgoulias](#)

Stormwater outfall information: Email [Bethany Georgoulias](#)

Visit the [eDMR Six Steps website](#) and complete Steps 1 and 2.

Pay outstanding permit fees: [Stormwater ePayment website](#)

Thank you,

Brianna Young, MS (she/her/hers)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

[\(e-mail preferred\)](mailto:Brianna.Young@ncdenr.gov)

919-707-3647 (office)

Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612

Physical address: 512 North Salisbury Street, Raleigh, NC 27604

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From: Westley Riscili <westley.riscili@kymerainternational.com>

Sent: Friday, September 16, 2022 10:55 AM

To: Young, Brianna A <Brianna.Young@ncdenr.gov>

Cc: Jonathan White <jonathan.white@kymerainternational.com>

Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

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Hi Brianna,

If I previously have been set up for eDMR submissions, do I need to complete this exercise again?

Regards,

Westley Riscili, CQIA – N.A. Environmental Compliance Manager
Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA

Tel +1 (919) 544.8090

Direct +1 (919) 287.9891

Mobile +1 (716) 307.3191

westley.riscili@kymerainternational.com

ACuPowder | AmeriTi Manufacturing | ECKA Granules | Innobraze | Reading Alloys | SCM Metal Products | Telex Metals
www.kymerainternational.com

From: Young, Brianna A <Brianna.Young@ncdenr.gov>

Sent: Tuesday, September 13, 2022 10:57 AM

To: Westley Riscili <westley.riscili@kymerainternational.com>

Cc: Jonathan White <jonathan.white@kymerainternational.com>

Subject: RE: [External] RE: SCM Metal Products, Inc. (NCS000050)

[[EXTERNAL EMAIL]]

Westley,

Thank you for the quick response. I received a bounce back on Jill Spaulding's email address on my original send. As you gather the data, please make sure to also follow the links in the previous email to update the contacts for this permit so our database is accurate. Please let me know if you have any questions as you work through the request.

Thank you,

Brianna Young, MS (she/her)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (e-mail preferred)
919-707-3647 (office)

Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612
Physical address: 512 North Salisbury Street, Raleigh, NC 27604

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From: Westley Riscili <westley.riscili@kymerainternational.com>
Sent: Tuesday, September 13, 2022 10:38 AM
To: Young, Brianna A <Brianna.Young@ncdenr.gov>
Cc: Jonathan White <jonathan.white@kymerainternational.com>
Subject: [External] RE: SCM Metal Products, Inc. (NCS000050)

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

Good morning Brianna,

I am happy to assist with the requested information. Since our submission of this renewal, there have been some changes at the facility. Jonathan White (in copy here) is the new Operations Manager. I am still the technical contact for the facility. We are currently in the process of adding additional processes at the facility. These are both dry processes in which all handling and processing activities occur indoors. These include the processing of tin and bismuth. None of these processes should have an impact on the stormwater quality for this facility. Construction for these processes is currently underway. The next phase of construction will also include some new processing equipment for copper. All activities for this process will also occur indoors. If you have any questions while I gather the requested information, please do not hesitate to ask.

Best regards,

Westley Riscili, CQIA – N.A. Environmental Compliance Manager
Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA
Tel +1 (919).544.8090
Direct +1 (919).287.9891
Mobile +1 (716).307.3191
westley.riscili@kymerainternational.com

ACuPowder | AmeriTi Manufacturing | ECKA Granules | InnoBraze | Reading Alloys | SCM Metal Products | Telex Metals
www.kymerainternational.com

From: Barton White <barton.white@kymerainternational.com>
Sent: Monday, September 12, 2022 5:51 PM
To: Westley Riscili <westley.riscili@kymerainternational.com>; Gabor Szentivanyi <Gabor.Szentivanyi@kymerainternational.com>
Subject: Fwd: SCM Metal Products, Inc. (NCS000050)

Not sure if this is Spam but it looks legit

From: Young, Brianna A <Brianna.Young@ncdenr.gov>
Sent: Monday, September 12, 2022 4:06 PM
To: jspaulding@scmmetals.com <jspaulding@scmmetals.com>
Cc: Barton White <barton.white@kymerainternational.com>
Subject: SCM Metal Products, Inc. (NCS000050)

[[EXTERNAL EMAIL]]

Good afternoon,

I am working on renewing the individual stormwater permit for the SCM Metal Products, Inc. (NCS000050). I need additional information in order to 1) confirm that the information I have is correct and 2) make sure the permit adequately serves the needs of the facility. Please provide the following:

- Confirmation on number of outfalls and associated coordinates;
- Confirmation of the receiving stream for each outfall;
- Description of industrial activity in each drainage area;
- SIC (NAICS) code;
- An electronic spreadsheet summarizing all of the monitoring data that has been collected since the effective date of the current permit;
- Verification that the information in the renewal application is still complete and correct; and
- An explanation of any operational changes since the renewal application was submitted.

Enter your stormwater permit number into the [Stormwater Permit Summary Report](#) and you will see a form that includes the address of the facility, contact information for the permit, and the regulated stormwater outfall(s) for the facility. Please review the facility information to make sure it is correct. Information can be updated using the links provided below, where applicable:

Facility/Company name or ownership: [Name/Ownership Change Form](#)

Owner Affiliation (Legally responsible person; i.e., someone with the company who is designated to represent the company per signatory requirements or another authorized representative): [Permit Contact Update Request Form](#)

Delegation of Signature Authority (DOSA): [Permit Contact Update Request Form](#)

Billing contact: [Permit Contact Update Request Form](#)

Permit contact: [Permit Contact Update Request Form](#)

Facility contact: [Permit Contact Update Request Form](#)

Facility address **only**: Email [Bethany Georgoulias](#)

Stormwater outfall information: Email [Bethany Georgoulias](#)

Visit the [eDMR Six Steps website](#) and complete Steps 1 and 2.

Pay outstanding permit fees: [Stormwater ePayment website](#)

Once I have the above listed information, I can continue my review. You will receive a draft permit for a 30-day comment period. During this time we will be able to address any comments or concerns you have. During the same 30-day period, the draft will be sent to a Regional Office staff member for review as well as out to public notice. Once all comments and concerns are addressed, you may be issued a final permit.

Please contact me if you have any questions.

Thank you,

Brianna Young, MS (she/her)
Industrial Individual Permits Coordinator
Stormwater Permitting Program
NC DEQ / Division of Energy, Mineral, and Land Resources (DEMLR)

Brianna.Young@ncdenr.gov (e-mail preferred)
919-707-3647 (office)

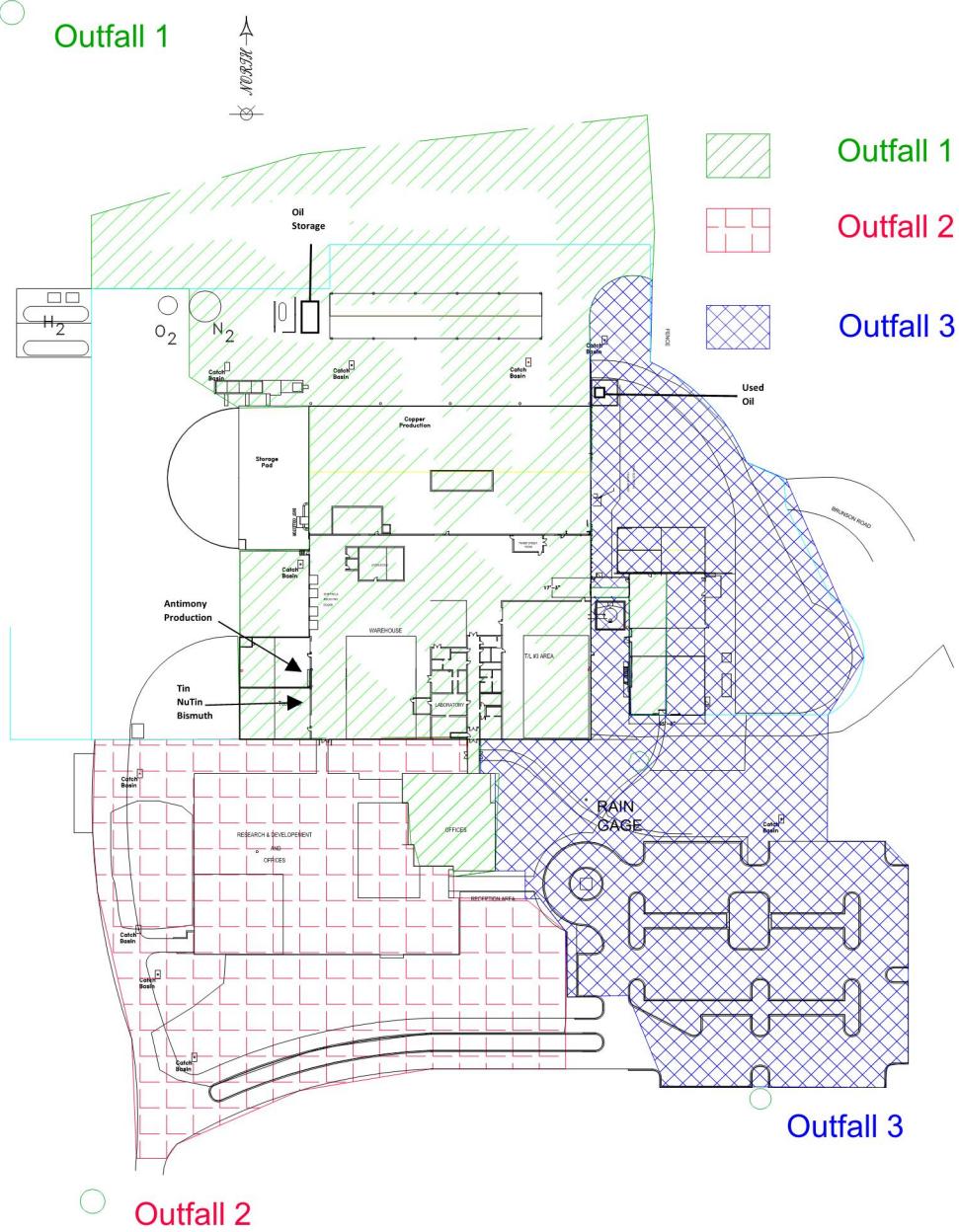
Mailing address: 1612 Mail Service Center, Raleigh, NC 27699-1612
Physical address: 512 North Salisbury Street, Raleigh, NC 27604

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Outfall 1



Outfall 1

Outfall 2

Outfall 3

Outfall 2

Requested information:

- Confirmation on number of outfalls and associated coordinates;
 - ✓ **The number of outfalls and associated coordinates have not changed.**
- Confirmation of the receiving stream for each outfall;
 - ✓ **The receiving stream for each outfall remains unchanged.**
- Description of industrial activity in each drainage area;

2.1 Outfall 1 (Area 1)

Industrial activities, consisting of raw material storage, chemical storage, waste storage, equipment storage, and loading/unloading operations take place throughout the drainage area of the storm water outfall. Because of this, the outfall drainage area will be subdivided into the following four sections: (1) between the copper plant/warehouse building and the west fence line extending to the northwest fence corner, (2) across the rear of the plant from the northwest fence corner to northeast fence corner, (3) between the copper plant/warehouse building and the eastern fence, and (4) the general area between the copper plant/warehouse building and the maintenance building.

2.1 Area 1 Section (1)

The area adjacent to the western fence line is primarily used for storage of new pallets, scrap materials, equipment that is not in use, liquid hydrogen storage and loading/unloading operations. The scrap materials consist of scrap metal. The equipment consists of process equipment that is not in use as well as equipment that is used from time-to-time but temporarily stored in this area until needed. Three newly commissioned processes reside in this area and are described below.

Adjoining the building is the copper storage area. This area, consisting of a concrete pad, is completely covered and thus eliminates storm water exposure to the copper metal stored there. Slag material from melt furnace skimming operations is stored in this area before shipment to a metal reclamation facility. The southwest corner of the warehouse contains ancillary processes consisting of the processing of antimony ingots into powder through a series of crushers and mills, and the air atomization of tin, tin-copper alloy, and bismuth and associated screening operations. Emissions from these processes are controlled with baghouses and do not have any open discharges to the outside. A bulk storage tank for Argon is located in this area. There are also waste receptacles such as dumpsters and a trash compactor in this area. The compactor is located in the truck loading/unloading area and is mainly used for office trash and used shipping containers. The primary source of storm water contamination in this area is from the waste materials themselves and residue on waste materials and equipment that is stored outside.

2.1 Area 1 Section (2)

Located in the area beginning at the northwest fence corner and extending to the maintenance building are SCM's oil storage building, propane, liquid oxygen and liquid nitrogen bulk storage tanks. Drums in the oil storage building are stored on containment pallets and are completely sheltered from contact with stormwater. The contents of the bulk storage tanks contain liquefied gases that return to a gaseous state at ambient temperature and pressure and therefore do not constitute a storm water contamination hazard.

Within the area that extends from the east corner of the maintenance building to the northeastern fence corner is a cooling tower. The main potential for contamination in this area is from chemicals used to treat the water used in the cooling tower. All chemicals used in the cooling tower are added to the system inside the building that helps reduce the likelihood of contact with storm water. The former drum crusher was eliminated from this area in 2018. It had not been used in several years, as metal drums are now exchanged and picked up by our supplier.

2.1 Area 1 Section (3)

Near the northeast corner of the building is the waste oil storage tank. The waste filter storage bin has been eliminated from this area, and the filters are now cleaned and stored inside of the maintenance

shop. The waste oil storage tank is located on a concrete secondary containment pad within an additional secondary containment structure.

2.1 Area 1 Section (4)

The area between the maintenance building and the copper plant/warehouse building is primarily used for storage of ethylene glycol and SCM mix, which are used in the Cubond process. The materials are stored in sealed containers with appropriate covers and secondary containment.

2.2 Outfall 2 (Area 2)

Industrial activity contributing to storm water run-off from this area is limited to a loading/unloading area that adjoins the Research and Development Labs and the road that provides access to the manufacturing areas of the plant. Therefore, the primary source of storm water contamination in this area is through accidental spills that could occur during transport of raw materials and wastes through this area. The occurrence of large spills in this area is considered unlikely.

2.2 Outfall 3

The industrial activity in this area that could contribute to storm water contamination includes the production of Cubond® Brazing paste and the storage of tin powders. A waste water treatment tank located in this area has a sufficiently sized secondary-containment structure.

The industrial activities occur indoors. The only potential source of storm water contamination is the dust collector located between the copper production area and the Cubond® production area; it is inspected at regular intervals.

- SIC (NAICS) code;
 - ✓ **331420**
- An electronic spreadsheet summarizing all of the monitoring data that has been collected since the effective date of the current permit;
 - ✓ **Spreadsheet is attached in this email.**
- Verification that the information in the renewal application is still complete and correct.
 - ✓ **Some modifications are required due to the commissioning of new processes. These will be uploaded separately.**
- An explanation of any operational changes since the renewal application was submitted.
 - ✓ **The primary changes since the renewal application was submitted are as follows:**
 - The commissioning of the Antimony Process. This is an ancillary process in which antimony ingots are processed through crushing and milling into a powder. The process is contained within the building and is not considered to be a potential stormwater contamination source.
 - The commissioning of the Tin/NuTin/Bismuth processes. These ancillary processes produce tin powder, tin-copper alloy powders, and bismuth powders through air atomization and screening. These processes are contained within the same building and are not considered to be a potential stormwater contamination source.
 - The oil storage location for this facility was moved to an adjacent building to the Maintenance shop. The floor was sealed, and all drums are contained in the building on secondary containment pallets. These are not exposed to stormwater.

- The former drum crusher had not been in use for many years, and in 2018, it was decommissioned and removed from the site. Empty drums are now exchanged with the vendor for these chemicals.

Year	Period	Date	Total Rainfall (inches)	Outfall	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids, (mg/l)	pH
1	1	5/9/2012	0.3	1	13.5	0.118	145	7.7
				2	0.692	0.048	<2.5	7.5
				3	12.1	0.106	1180	8.1
1	1 Resample	5/30/2012	0.2	1	0.599	0.082	5.1	7.8
				2	0.756	0.055	16.8	7.9
				3	0.36	0.03	5.6	8.4
1	1 Resample	6/11/2012	1	1	4.29	0.102	9.1	7.7
				2	0.517	0.029	<2.5	7.8
				3	0.794	0.021	8.4	7.9
1	2	11/13/2012	0.15	1	0.919	0.037	7	8
				2	0.385	0.036	ND	8.1
				3	2.64	0.11	53.5	8.1
2	1	5/6/2013	1.35	1	1.29	0.0686	13.5	8.2
				2	1.32	0.0698	16.4	7.6
				3	0.494	0.0403	5.2	8.5
2	2	12/7/2013	0.2	1	0.72	0.04	4.1	8.1
				2	1.2	0.058	27.1	7.9
				3	1.7	0.048	26	8.1
3	1	4/15/2014	1.1	1	1.34	0.079	49.6	7.3
				2	1.62	0.026	9.3	7.4
				3	1.47	0.036	63	7.3
3	2	11/17/2014	0.35	1	1.27	0.168	13.6	7.3
				2	0.848	0.05	3.1	7.1
				3	1.58	0.054	7.2	7.4
4	1	4/15/2015	1	1	0.801	0.067	9.4	7.6
				2	0.937	0.046	3.4	7.3
				3	1.16	0.037	6.1	7.5
4	2	11/19/2015	1.4	1	0.675	0.035	9.7	7.6
				2	0.713	0.024	3.6	7.2
				3	1.08	0.019	26.3	7.5
5	1	5/13/2016	0.5	1	1.34	0.152	12.3	7.8
				2	0.963	0.062	3	7.4
				3	0.89	0.024	5	7.5
5	2	9/27/2016	1.3	1	1.39	0.117	2.7	7.1
				2	1.22	0.046	ND	7.3
				3	0.598	0.02	5.1	7.8
6	1	3/13/2017	0.8	1	2.62	0.346	6.8	7.8
				2	1.22	0.069	15.1	7.2
				3	1.04	0.039	ND	8.2
6	2	8/23/2017	0.15	1	3.58	0.1	11.5	7.2
				2	1.06	0.066	6.3	6.8
				3	1.03	0.03	16.4	6.7
7	1	5/16/2018	0.5	1	2.03	0.16	2.5	7.1
				2	1.4	0.07	6	6.8
				3	1.79	0.04	11.3	6.7
7	2	10/9/2018	0.1	1	1.02	0.06	ND	8
				2	0.79	0.04	2.9	7.2
				3	1.06	0.04	8.4	7.5
8	1	3/15/2019	0.45	1	1.83	0.152	ND	7.9
				2	1.3	0.044	10	7.6
				3	0.937	0.042	5.3	7.3
8	2	10/30/2019	0.4	1	1.74	0.122	ND	7.3
				2	0.838	0.053	2.8	6.7
				3	0.853	0.036	5.2	7.6
9	1	5/18/2020	0.35	1	1.89	0.101	ND	6.9
				2	0.893	0.046	3.1	6.7
				3	1.22	0.029	7.8	6.9
9	2	11/11/2020	3.15	1	1.18	0.073	ND	7.7
				2	0.93	0.036	ND	7.1
				3	1.3	0.023	3.6	7.1
10	1	3/16/2021	0.2	1	4.53	0.11	13.4	7.8
				2	1.17	0.1	ND	6.9
				3	1.53	0.04	25.1	7.3
10	2	11/22/2021	0.6	1	2.78	0.214	2.7	6.8
				2	2.05	0.075	15.8	7.5
				3	0.855	0.066	7.3	7.5
11	1	3/31/2022	1	1	1.96	0.444	16.8	7.5
				2	1.45	0.081	21.4	7.5
				3	1.35	0.0296	14.3	6.9

- File an Annual Report/Amend an Annual Report • Upload a PDF Filing • Order a Document Online •
- Add Entity to My Email Notification List • View Filings • Print a Pre-Populated Annual Report form • Print an Amended a Annual Report form

Business Corporation

Legal Name

SCM Metal Products, Inc.

Information

SosId: 0729075

Status: Current-Active ⓘ

Date Formed: 6/7/2004

Citizenship: Foreign

State of Incorporation: DE

Fiscal Month: December

Annual Report Due Date: April 15th

Current Annual Report Status:

Registered Agent: CT Corporation System

Addresses

Reg Office	Reg Mailing	Mailing
160 Mine Lake Ct Ste 200 Raleigh, NC 27615-6417	160 Mine Lake Ct Ste 200 Raleigh, NC 27615-6417	2601 Weck Drive Research Triangle Park, NC 27709

Principal Office

2601 Weck Drive
Research Triangle Park, NC 27709

Officers

Chief Financial Officer

James C. Hunt
2601 Weck Drive
Research Triangle Park NC 27709

Vice President

Julie Waymouth
2601 Weck Drive
Research Triangle Park NC 27709

President

Barton White
2601 Weck Drive
Research Triangle Park NC 27709

Stock



ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

WILLIAM E. TOBY VINSON, JR.
Interim Director

April 26, 2018

Mr. Westley Riscili, CQIA
SCM Metal Products, Inc.
2601 Weck Drive
Durham, NC 27709

Subject: NPDES Stormwater Permit Renewal
Permit No. NCS000050
SCM Metal Products
Durham County

Dear Mr. Riscili:

The Division of Energy, Mineral and Land Resources' Stormwater Permitting Program acknowledges receipt of your renewal application for coverage under NPDES Permit Number NCS000050 on July 29, 2016. We are currently in the process of reducing our backlog of permit renewals, including the subject renewal application. Please continue to comply with all conditions and monitoring requirements in your current or expired NPDES stormwater permit. **Since you submitted a complete renewal request package in a timely manner, and as long as you maintain compliance with those permit conditions, stormwater discharges from this facility are automatically authorized by that expired permit (Part III Sect. B.1) until the Division issues a renewal permit or notifies you of an alternative action.**

No additional information is required at this time. Please notify us if any significant changes have taken place at this facility since you submitted the renewal package. If you have any questions or comments concerning this permit, contact Bethany Georgoulias at (919) 807-6372 or at Bethany.Georgoulias@ncdenr.gov.

Sincerely,

A handwritten signature in red ink that reads "R.D. Patterson".

Robert D. Patterson, PE
Environmental Engineer
Stormwater Program

cc: Bethany Georgoulias – DEMLR Stormwater Program
NCS000050 File
DEMLR RRO

McCoy, Suzanne

From: westley riscilli <westley.riscili@kymerainternational.com>
Sent: Thursday, March 14, 2019 4:20 PM
To: McCoy, Suzanne
Subject: [External] FW: NPDES Permit Number NCS000050 renewal amendments
Attachments: Storm water renewal amendment.pdf

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to report.spam@nc.gov

Good afternoon Suzanne,

I just wanted to confirm that you have received my previous email. Please let me know if you need any additional information.

Best regards,

Westley Riscili, CQIA – Environmental Specialist
Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA
Tel +1 (919) 544.8090
Direct +1 (919) 287.9891
Mobile +1 (716) 307.3191
westley.riscili@kymerainternational.com

ACuPowder | ECKA Granules | SCM Metal Products
www.kymerainternational.com

From: westley riscili
Sent: Monday, March 11, 2019 2:36 PM
To: suzanne.mccoy@ncdenr.gov
Subject: NPDES Permit Number NCS000050 renewal amendments

Good afternoon Suzanne,

I had submitted a renewal application for our storm water permit in 2016, in which we are still operating under the parameters of the previous permit as instructed by the state because we have not received the renewal to date. However, we would like to make a small amendment to that application, as we intend to install a new process onsite in June of this year. Please see the attached cover letter, along with an amended Significant Changes in Industrial Activities and a site map showing the location of the new process.

Also, our copier does not produce the best quality copies. Please let me know the supplied attachment is acceptable to request this change, or the preferred method of submission if this is not acceptable.

I appreciate your help on this matter.

Best regards,

Westley Riscili, CQIA – Environmental Specialist

Kymera International

SCM Metal Products | 2601 Weck Drive | RTP | NC | 27709 | USA

Tel +1 (919).544.8090

Direct +1 (919).287.9891

Mobile +1 (716).307.3191

westley.riscili@kymerainternational.com

ACuPowder | ECKA Granules | SCM Metal Products

www.kymerainternational.com



March 11, 2019

SW Individual Permit Coverage Renewal
Stormwater Permitting Program
1612 Mail Service Center
Raleigh, NC 27699-1612

Registered Mail: 7004 1350 0002 8891 8848

To whom it may concern:

The purpose of this letter is to notify the state of SCM Metal Products' intent to install a new process at our facility. In 2016 I had submitted a permit renewal form for SCM Metal Products, Inc., permit No. NCS000050. We have not received the renewed permit to date, and we are currently operating within the parameters of our previous permit as instructed by the state. However, there is a plan to install a new process in June of this year in which antimony ingots will be processed into antimony powder. We would like for the state to include this process in our permit during the renewal process.

This process will include crushing, milling, and screening operations. The process will be located indoors in the previous location of our tin powder production area, which is no longer in operation. The process will be connected to a baghouse that will be located outside of the building as a control device for air quality. There are no floor drains associated with this process that are connected to any of our storm drains. This process will be located in the area of our storm water site map that is directed to outfall #1. We do not anticipate any emissions that would affect storm water quality. We will update our storm water pollution prevention plan accordingly to include this process.

If you have any questions or require additional information please contact me at westley.riscili@kymerainternational.com, and I can be reached direct at (919) 287-9891.

Sincerely,

Westley Riscili

Enclosures: SCM Metal Products, Inc. Storm Water Site Map showing the location of the antimony process and an amendment to the Significant Changes in Industrial Activities that was submitted with the 2016 renewal application.



SIGNIFICANT CHANGES IN INDUSTRIAL ACTIVITIES

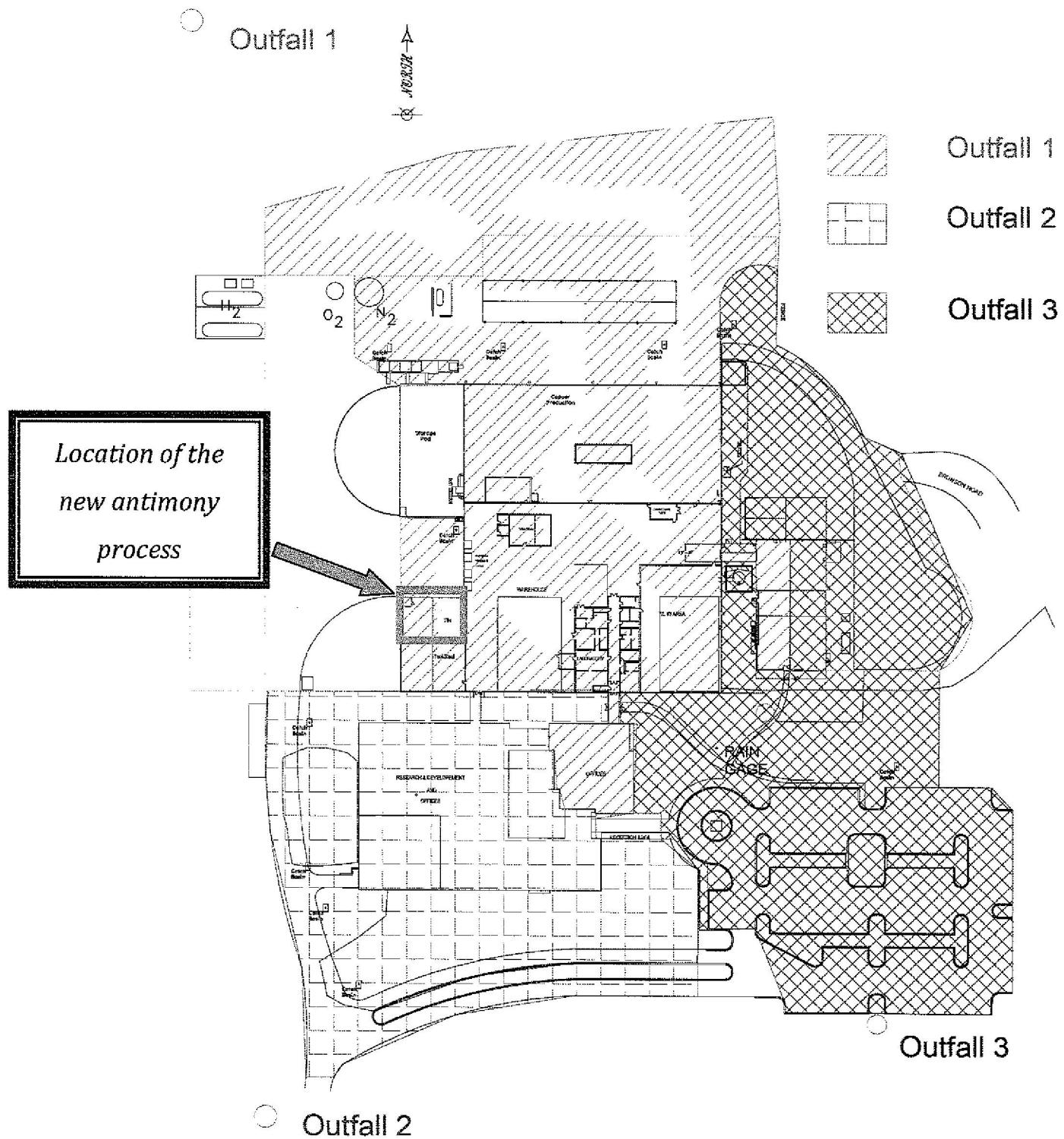
In March of 2013, the Brazing Manufacturing Process was moved into the main facility from an outside building. This relocation of this process has helped eliminate the transfer of materials between buildings.

In December of 2013, the Tin Manufacturing Process was discontinued at the RTP facility. This product is now produced at a sister facility.

Most additives are stored indoors, with the exception of some drums of flammable liquids, which SCM is required to store outdoors by the fire department. These drums are stored on secondary containment pallets and are covered with tarps.

SCM intends to install an Antimony Powder Process at our RTP facility. This process includes the crushing of antimony ingots, and the grinding/milling and screening of antimony powder. This process is planned to be installed in June of 2019. The Storm Water Pollution and Prevention Plan will be updated accordingly.

SCM Metal Products, Inc. Storm Water Site Map





Permit Coverage
Renewal Application Form
National Pollutant Discharge Elimination System
Stormwater Individual Permit

NPDES Permit Number
NCS000050

Bims
7/29/16
ja

Please provide your permit number in box in the upper right hand corner, complete the information in the space provided below and return the completed renewal form along with the required supplemental information to the address indicated.

Owner Information

Owner / Organization Name: *SCM Metal Products, Inc.*
Owner Contact: *Barton White*
Mailing Address: *2601 Weck Drive
RTP, NC 27709
919-544-8090
919-544-7996
bwhite@scmmetals.com*

Facility Information

Facility Name: *SCM Metal Products, Inc.*
Facility Physical Address: *2601 Weck Drive
RTP, NC 27709
Jill Spaulding
2601 Weck Drive
RTP, NC 27709
919-544-8090
919-544-8332
jspaulding@scmmetals.com*

Permit Information

Permit Contact: *Westley Riscili*
Mailing Address: *2601 Weck Drive, RTP, NC 27709
RTP, NC 27709
919-287-9891
919-544-8332
wriscili@scmmetals.com*

Discharge Information

Receiving Stream: *Unnamed tributary to Northeast Creek, Stirrup Iron Creek*
Stream Class: *C,C*
Basin: *Cape Fear River Basin, Neuse River Basin*
Sub-Basin:
Number of Outfalls: *3*

Facility/Activity Changes Please describe below any changes to your facility or activities since issuance of your permit. Attached a separate sheet if necessary.

The Brazing Paste Manufacturing Process was moved from an outside building into the main facility in March of 2013. In addition, the Tin Manufacturing Process was discontinued at this facility in December of 2013. All additives, with the exception of some drums of flammable material, are stored inside. SCM has an agreement with the local fire department to store these drums outdoors, covered on a secondary containment pallet.

CERTIFICATION

I certify that I am familiar with the information contained in the application and that to the best of my knowledge and belief such information is true, complete and accurate.

Signature

Jill Spaulding

Print or type name of person signing above

Date

7/25/16

Plant Manager

Title

Please return this completed application form and requested supplemental information to:

SW Individual Permit Coverage Renewal
Stormwater Permitting Program
1612 Mail Service Center
Raleigh, North Carolina 27699-1612

SUPPLEMENTAL INFORMATION REQUIRED FOR RENEWAL OF INDIVIDUAL NPDES STORMWATER PERMIT

Two copies of each of the following shall accompany this submittal in order for the application to be considered complete:

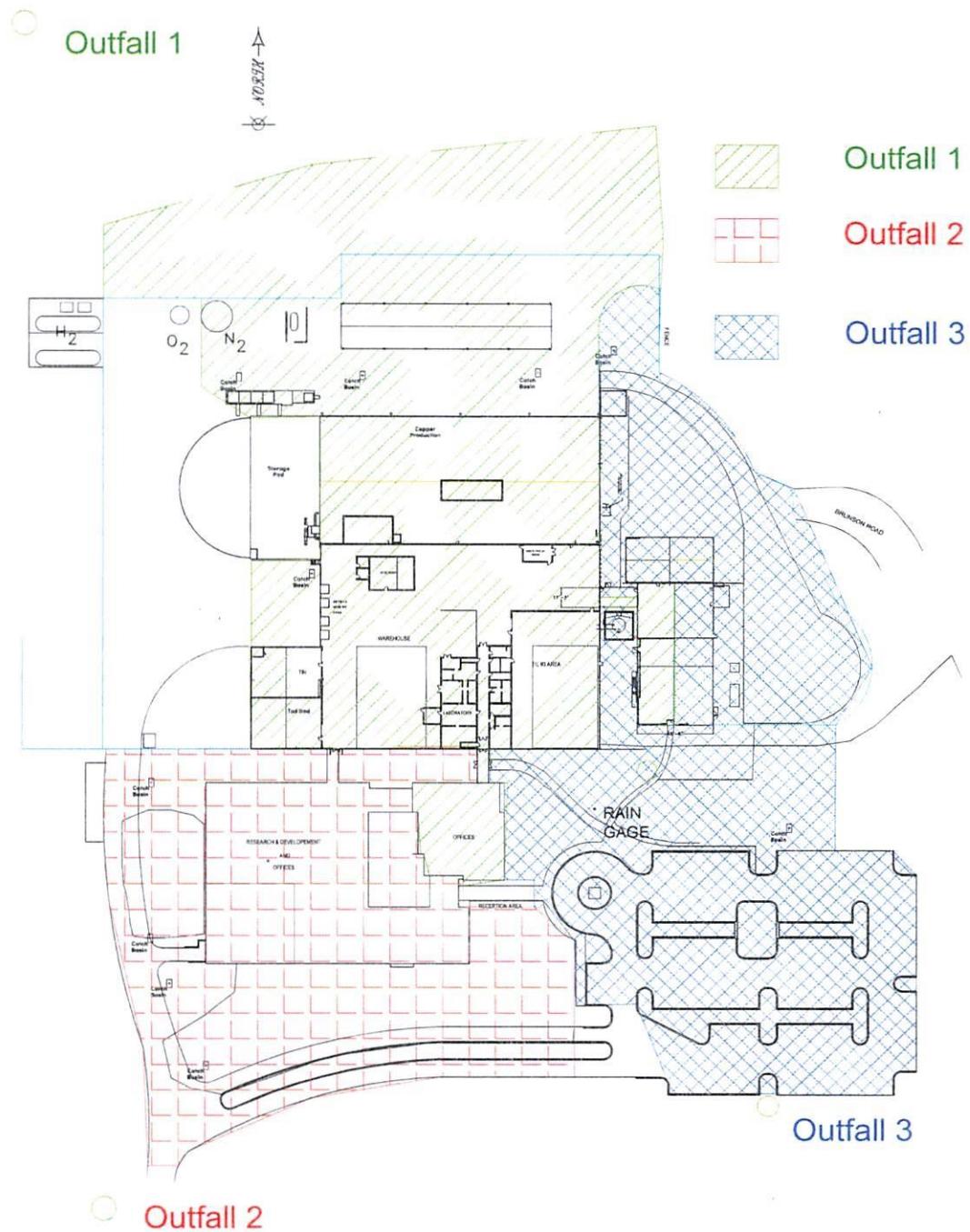
(Do not submit the site Stormwater Pollution Prevention Plan)

Initials

- WSR 1. A current Site Map from the Stormwater Pollution Prevention Plan. The location of industrial activities (including storage of materials, disposal areas, process areas and loading and unloading areas), drainage structures, drainage areas for each outfall, building locations and impervious surfaces should be clearly noted.
- WSR 2. A summary of Analytical Monitoring results during the term of the existing permit (if your permit required analytical sampling). Do not submit individual lab reports. The summary can consist of a table including such items as outfall number, parameters sampled, lab results, date sampled, and storm event data.
- WSR 3. A summary of the Visual Monitoring results. Do not submit individual monitoring reports. The summary can consist of a table including such items as outfall number, parameters surveyed, observations, and date monitoring conducted.
- WSR 4. A summary of the Best Management Practices utilized at the permitted facility. Summary should consist of a short narrative description of each BMP's in place at the facility. If the implementation of any BMP's is planned, please include information on these BMP's.
- WSR 5. A short narrative describing any significant changes in industrial activities at the permitted facility. Significant changes could include the addition or deletion of work processes, changes in material handling practices, changes in material storage practices, and/or changes in the raw materials used by the facility.
- WSR 6. Certification of the development and implementation of a Stormwater Pollution Prevention Plan for the permitted facility (Sign and return attached form).

If the final year analytical monitoring of the existing permit term has not been completed prior to filing the renewal submittal, then the last years monitoring results should be submitted within 30 days of receipt of the laboratory reports. (i.e. do not withhold renewal submittal waiting on lab results)

SCM Metal Products, Inc. Storm Water Site Map



SCM Metal Products, Inc.

Summary of Analytical Monitoring Results

Permit No. NCS000050

Date: 05/09/12		Total Rainfall (inches): 0.3	Year: 1	Period: 1	
Outfall #	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids (TSS)	pH	
1	13.5	0.118	145	7.7	
2	0.692	0.048	<2.5	7.5	
3	12.1	0.106	1180	8.1	

Date: 05/30/12		Total Rainfall (inches): 0.2	Year: 1	Period: 1 (resample)	
Outfall #	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids (TSS)	pH	
1	0.599	0.082	5.1	7.8	
2	0.756	0.055	16.8	7.9	
3	0.360	0.030	5.6	8.4	

Date: 06/11/12		Total Rainfall (inches): 1.0	Year: 1	Period: 1 (resample)	
Outfall #	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids (TSS)	pH	
1	4.29	0.102	9.1	7.7	
2	0.517	0.029	<2.5	7.8	
3	0.794	0.021	8.4	7.9	

Date: 11/13/12		Total Rainfall (inches): 0.15	Year: 1	Period: 2	
Outfall #	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids (TSS)	pH	
1	0.919	0.037	7.0	8.0	
2	0.385	0.036	ND	8.1	
3	2.64	0.110	53.5	8.1	

SCM Metal Products, Inc.

Summary of Analytical Monitoring Results

Permit No. NCS000050

Date: 05/06/13		Total Rainfall (inches): 1.35	Year: 2	Period: 1	
Outfall #	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids (TSS)	pH	
1	1.29	0.0686	13.5	8.2	
2	1.32	0.0698	16.4	7.6	
3	0.494	0.0403	5.2	8.5	

Date: 12/07/13		Total Rainfall (inches): 0.2	Year: 2	Period: 2	
Outfall #	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids (TSS)	pH	
1	0.72	0.040	4.1	8.1	
2	1.2	0.058	27.1	7.9	
3	1.7	0.048	26.0	8.1	

Date: 04/15/14		Total Rainfall (inches): 1.10	Year: 3	Period: 1	
Outfall #	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids (TSS)	pH	
1	1.34	0.079	49.6	7.3	
2	1.62	0.026	9.3	7.4	
3	1.47	0.036	63.0	7.3	

Date: 11/17/14		Total Rainfall (inches): 0.35	Year: 3	Period: 2	
Outfall #	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids (TSS)	pH	
1	1.27	0.168	13.6	7.3	
2	0.848	0.050	3.1	7.1	
3	1.58	0.054	7.2	7.4	

SCM Metal Products, Inc.

Summary of Analytical Monitoring Results

Permit No. NCS000050

Date: 04/15/15		Total Rainfall (inches): 1.00	Year: 4	Period: 1	
Outfall #	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids (TSS)	pH	
1	0.801	0.067	9.4	7.6	
2	0.937	0.046	3.4	7.3	
3	1.16	0.037	6.1	7.5	

Date: 11/19/15		Total Rainfall (inches): 1.40	Year: 4	Period: 2	
Outfall #	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids (TSS)	pH	
1	0.675	0.035	9.7	7.6	
2	0.713	0.024	3.6	7.2	
3	1.08	0.019	26.3	7.5	

Date: 05/13/16		Total Rainfall (inches): 0.5	Year: 5	Period: 1	
Outfall #	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids (TSS)	pH	
1	1.34	0.152	12.3	7.8	
2	0.963	0.062	3.0	7.4	
3	0.890	0.024	5.0	7.5	

Date:		Total Rainfall (inches):	Year: 5	Period: 2	
Outfall #	Copper, Total Recoverable (mg/l)	Zinc, Total Recoverable (mg/l)	Total Suspended Solids (TSS)	pH	
1	Will report results after next rain event.				
2					
3					

SCM Metal Products, Inc.

Summary of Visual Monitoring Results

NCS000050

Date: 05/09/12			Total Rainfall (inches): 0.30			Year: 1			Period: 1
Outfall #	Color	Odor	Clarity	Floating Solids	Suspended Solids	Foam	Oil Sheen	Erosion or deposition at the outfall	Obvious indicators of pollution
1	Clear	None	2	1	2	None	None	No	No
2	Clear	None	1	1	1	None	None	No	No
3	Clear	None	2	1	2	None	None	No	No

Date: 05/30/12			Total Rainfall (inches): 0.20			Year: 1			Period: 1
Outfall #	Color	Odor	Clarity	Floating Solids	Suspended Solids	Foam	Oil Sheen	Erosion or deposition at the outfall	Obvious indicators of pollution
1	Clear	None	1	1	1	None	None	No	No
2	Clear	None	1	1	1	None	None	No	No
3	Clear	None	1	1	1	None	None	No	No

Date: 06/11/12			Total Rainfall (inches): 1.0			Year: 1			Period: 1
Outfall #	Color	Odor	Clarity	Floating Solids	Suspended Solids	Foam	Oil Sheen	Erosion or deposition at the outfall	Obvious indicators of pollution
1	Clear	None	1	1	1	None	None	No	No
2	Clear	None	1	1	1	None	None	No	No
3	Clear	None	1	1	1	None	None	No	No

Date: 11/13/12			Total Rainfall (inches): 0.15			Year: 1			Period: 2
Outfall #	Color	Odor	Clarity	Floating Solids	Suspended Solids	Foam	Oil Sheen	Erosion or deposition at the outfall	Obvious indicators of pollution
1	Slight Brown	None	1	1-leaves	1	None	None	No	No
2	Clear	None	1	1-leaves	1	None	None	No	No
3	Clear	None	1	1	1	None	None	No	No

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Summary of Visual Monitoring Results

NCS000050

Date: 05/06/13			Total Rainfall (inches): 1.35			Year: 2			Period: 1
Outfall #	Color	Odor	Clarity	Floating Solids	Suspended Solids	Foam	Oil Sheen	Erosion or deposition at the outfall	Obvious indicators of pollution
1	Clear	None	1	2-pollen	1	None	None	No	No
2	Clear	None	2	1	2	None	None	No	No
3	Clear	None	1	1	1	None	None	No	No

Date: 12/07/13			Total Rainfall (inches): 0.20			Year: 2			Period: 2
Outfall #	Color	Odor	Clarity	Floating Solids	Suspended Solids	Foam	Oil Sheen	Erosion or deposition at the outfall	Obvious indicators of pollution
1	Clear	None	2	1	1	None	None	No	No
2	Clear	None	2	4-leaves	1	None	None	No	No
3	Clear	None	2	1	1	None	None	No	No

Date: 04/15/14			Total Rainfall (inches): 1.1			Year: 3			Period: 1
Outfall #	Color	Odor	Clarity	Floating Solids	Suspended Solids	Foam	Oil Sheen	Erosion or deposition at the outfall	Obvious indicators of pollution
1	Slight tan	None	2	1	2	None	None	Yes	No
2	Slight brown	None	1	1	1	None	None	No	No
3	Light tan	None	2	1	2	None	None	Yes	No

Date: 11/17/14			Total Rainfall (inches): 0.35			Year: 3			Period: 2
Outfall #	Color	Odor	Clarity	Floating Solids	Suspended Solids	Foam	Oil Sheen	Erosion or deposition at the outfall	Obvious indicators of pollution
1	Clear	None	1	3-leaves	1	None	None	Yes	No
2	Clear	None	1	3-leaves	1	None	None	Yes	No
3	Clear	None	1	3-leaves	1	None	None	Yes	No

SCM Metal Products, Inc.

Summary of Visual Monitoring Results

NCS000050

Date: 04/15/15			Total Rainfall (inches): 1.00			Year: 4			Period: 1	
Outfall #	Color	Odor	Clarity	Floating Solids	Suspended Solids	Foam	Oil Sheen	Erosion or deposition at the outfall		Obvious indicators of pollution
1	Clear	None	2	1	2-silt	None	None	Yes		No
2	Clear	None	1	2-leaves	1	None	None	Yes		No
3	Clear	None	1	2-pollen	1	None	None	Yes		No

Date: 11/19/15			Total Rainfall (inches): 1.40			Year: 4			Period: 2
Outfall #	Color	Odor	Clarity	Floating Solids	Suspended Solids	Foam	Oil Sheen	Erosion or deposition at the outfall	Obvious indicators of pollution
1	Clear	None	1	1	1	None	None	Yes	No
2	Clear	None	1	2-leaves	1	None	None	No	No
3	Clear	None	1	2-leaves	2-silt	None	None	yes	No

Date: 05/13/16			Total Rainfall (inches): 0.50			Year: 5			Period: 1
Outfall #	Color	Odor	Clarity	Floating Solids	Suspended Solids	Foam	Oil Sheen	Erosion or deposition at the outfall	Obvious indicators of pollution
1	Brown	None	2	1	2	None	None	Yes	No
2	Clear	None	1	1	1	None	None	Yes	No
3	Clear	None	1	1	1	None	None	Yes	No

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BEST MANAGEMENT PRACTICES

1. A high-efficiency sweeper was purchased for use on the paved area around the copper production area. The area between the copper production building and the CuBond®/Maintenance Building receives intensive sweeping. This area is swept twice per day, as weather conditions permit.
2. The slag storage has been located in the covered pad area. This storage removes this material from any storm water exposure.
3. The CuBond® dust collector has been enclosed and a clean-up method will be installed to gather possible spilled material.
4. A corrosion-proof storage tank with secondary containment has been installed for waste oil storage.
5. Clean out corrugated pipe leading to Outfall 1
6. New style trash dumpster/compactor to minimize rain water entering and washing through the dumpster. Also, an indicator will be included in the hydraulic system; this indicator will lead to more efficient use of the dumpster by assuring maximum loading. Maximum loading will minimize handling.
7. New rules on used pallet and card board disposal. These revisions have lowered the amount of material in the dumpster. These improvements also minimize dumpster handling.
8. Rules on material that can be added to the dumpster and different packaging requirements. CuBond® regularly bags the trash they add to the dumpster.
9. “Tacky Mats” at doorways between the copper production area and the outside area.
10. Fork truck and sweeper maintenance is performed indoors.
11. Preventative Maintenance of dust collectors was improved to include dye inspection of interior.
12. Glycerin storage has been moved indoors. Additionally, glycerin is stored in re-usable containers.
13. Written and posted instructions on floor sweeping. Sweeping is accomplished at least daily.
14. Work Instructions on Dust Collector Media change-out.
15. Implementation of employee task group meetings to elicit and evaluate copper exposure reduction BMP's.
16. Installation of new equipment to reduction fugitive copper dust emissions.
17. The Dust Control Committee will be revitalized
18. Include Storm Water Prevention awareness as part of Housekeeping Committee inspections.
19. A major Best Management Practice installed in 2010 was a Bio-Retention Device servicing the run-off from the paved area between the copper production building and the Maintenance/Cubond building.
20. The area north of the Maintenance/Cubond building was re-graded and planted to control run-off.
21. The continued implementation and improvement of dust collector bag change-out procedures, especially the Shot Furnace and Thin Layer Furnace dust collectors.

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22. Different filter media is being used in Dust Collector to determine efficacy
23. Improvement to storm drainage around the “Microbond Building” was completed. This work is expected to improve silt run-off in Outfall 3. The work was also undertaken to alleviate flooding conditions in the “Microbond Building.”
24. Improvements to erosion control have been implemented in other locations around the facility. These improvements were undertaken to reduce soil run-off.
25. Cubond® powder is stored indoors.
26. Additional erosion controls have been installed around the Cubond® building (formerly the Microbond building.)
27. Cubond® paste operations relocated to allow transfer of raw materials and product without exposure to storm water.
28. Additional erosion control installed.
29. Improved feeders were installed at belt furnaces to minimize fugitive emissions.
30. Cyclones in process area replaced to minimize fugitive emissions.
31. Trees have been planted in the Northwest corner of the property to help with erosion.
32. Used and broken pallets are stored indoors to minimize potential contact of contaminated pallets with storm water.
33. Outfall 3 was cleared of silt.
34. The corrugated pipe leading to Outfall 1 was cleared of silt.
35. Additional trees have been planted in the Northeast corner of the property to help reduce erosion.
36. A level spreader was installed in the Northeast corner of the property to help slow storm water runoff coming from the top of the hill to help ameliorate erosion issues in that area. This BMP runs North and South, parallel to the fence line on the east side of the property.
37. The earthen swale that runs from the Northeast corner of the property was re-graded, a silt liner was added to the swale and covered with grade A rip rap to help protect the swale from erosion.
38. The Bio-retention device located to the west of the hydrogen tank has been cleared of old vegetation, mulch, and soil, all of which has been replaced to specification of the original Bio-retention plans.

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SIGNIFICANT CHANGES IN INDUSTRIAL ACTIVITIES

In March of 2013, the Brazing Manufacturing Process was moved into the main facility from an outside building. This relocation of this process has helped eliminate the transfer of materials between buildings.

In December of 2013, the Tin Manufacturing Process was discontinued at the RTP facility. This process was moved to another SCM Manufacturing Plant in Union, New Jersey.

Most additives are stored indoors, with the exception of some drums of flammable liquids, which SCM is required to store outdoors by the fire department. These drums are stored on secondary containment pallets and are covered with tarps.

STORMWATER POLLUTION PREVENTION PLAN DEVELOPMENT AND IMPLEMENTATION CERTIFICATION

North Carolina Division of Energy, Mineral, and Land Resources – Stormwater Permitting

Facility Name: SCM Metal Products, Inc.
Permit Number: NCS000050
Location Address: 2601 Week Drive, RTP, NC 27709
County: Durham

"I certify, under penalty of law, that the Stormwater Pollution Prevention Plan (SPPP) document and all attachments were developed and implemented under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information required by the SPPP. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information gathered is, to the best of my knowledge and belief, true, accurate and complete."

And

"I certify that the SPPP has been developed, signed and retained at the named facility location, and the SPPP has been fully implemented at this facility location in accordance with the terms and conditions of the stormwater discharge permit."

And

"I am aware that there are significant penalties for falsifying information, including the possibility of fines and imprisonment for knowing violations."

Sign (according to permit signatory requirements) and return this Certification. DO NOT SEND STORMWATER POLLUTION PREVENTION PLAN WITH THIS CERTIFICATION.

Signature

Jarbyranky
Jill Spaulding

Print or type name of person signing above

Date

7/25/16
Plant Manager

Title