



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
DENVER, CO 80202  
Phone 800-227-8917  
<http://www.epa.gov/region08>

September 27, 2020

Ref: 8WD-CWW

**SENT VIA EMAIL**  
**ELECTRONIC READ RECEIPT REQUESTED**

Monte Paddleford, President  
Eagle Bronze, Inc.  
[monte@eaglebronze.com](mailto:monte@eaglebronze.com)

Re: EPA Pretreatment Notification of Non-Significant Categorical Industrial User Requirements,  
ICIS Number: WY-PF00101

Dear Mr. Paddleford:

Eagle Bronze, Incorporated (Eagle Bronze) entered into an Administrative Order on Consent (AOC), Docket # CWA-08-2015-0018 with the Environmental Protection Agency (EPA) on June 11, 2015. In addition, on July 26, 2019, EPA conducted an inspection of Eagle Bronze. Based on information gathered during the inspection and discharge monitoring reports required by the AOC, EPA has determined that Eagle Bronze should be classified as a Non-Significant Categorical Industrial User (NSCIU) subject to the Metal Finishing Point Source Category Pretreatment Standards at 40 CFR 433.17. Eagle Bronze is an industrial user of the Town of Lander's publicly owned treatment works (POTW), which does not have a Pretreatment Program approved by EPA. Therefore, EPA directly oversees compliance of industrial users that discharge to the Town of Lander's POTW and is partnering with the Town to ensure its POTW is protected from potential impacts of pollutants discharged from non-domestic sources.

Enclosed is information regarding Eagle Bronze's discharge requirements as an NSCIU (Enclosure 1, Non-Significant Categorical Industrial User Requirements). This enclosure sets forth specific notification and reporting requirements EPA has established in accordance with the NSCIU definition found in 40 CFR Part 403.3(v)(2). Enclosure 2 is the associated fact sheet, which provides a rationale for the conditions set forth in Enclosure 1.

The Pretreatment Regulations at 40 CFR 403.12(j) require Eagle Bronze to promptly notify EPA and the Town of Lander in advance of any substantial change in the volume or character of pollutants in its discharge. These substantial changes could include changes that may affect the NSCIU requirements contained in this notification such as discharges of regulated wastewater over 100 gallons per day for any production day, changes to the operations, wastestream generation, and/or wastewater management that may affect the status of Eagle Bronze under the Pretreatment Regulations.

Nothing contained in this notification package or in any EPA regulations restrict State or local agencies from imposing additional requirements in accordance with applicable laws, including requirements which are more stringent than those imposed by EPA.

If you have any questions about the enclosed information, please contact Al Garcia at 303-312-6382 or [garcia.al@epa.gov](mailto:garcia.al@epa.gov).

Sincerely,

Darcy O'Connor, Director  
Water Division

Enclosures:

1. Non-Significant Categorical Industrial User Requirements under the Metal Finishing Point Source Category and the General Pretreatment Regulations
2. Eagle Bronze Fact Sheet

cc:

Lance Hopkin, Public Works Director, City of Lander (via email)  
Jason Thomas, Water Quality Division, Wyoming Department of Environmental Quality (via email)