Pretreatment Compliance Inspection

Summary Report

Discharger:	City of North Las Vegas NPDES Permit No. NV0023647
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Inspection Dates:	September 29–30, 2014
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1. Executive Summary

This report includes several requirements to enhance the operation of the City of North Las Vegas's (City's) pretreatment program. Requirement for the City's pretreatment program are also included in section 12.1 of this report.

- The City is required to develop and seek approval for a pretreatment program in accordance with the federal regulations at 40 CFR 403.8(a).
- The City is required to ensure that it identifies and locates all possible industrial users within its service area.
- The City is required to modify its SUO to ensure that it has the proper legal authority to require compliance with applicable pretreatment standards and requirements by Industrial Users.
- The City is required to conduct a technical evaluation for local limits, and to develop local limits for the City's Water Reclamation Facility (WRF).
- The City is required to update its sewer use ordinance (SUO) to include information regarding the City's WRF and the required streamlining provisions.
- The City is required to ensure that it issues effective permits to the significant industrial users (SIUs) in order to control the wastewater contributed to the publically owned treatment works (POTW) by each industrial user (IU).
- The City is required to ensure that the language in its Class I and Class II permits includes the requirement for the facility to notify the City in the event of a significant change in the wastewater discharged to the City.
- The City is required to ensure that it samples each SIU at least once each year and keeps adequate records of these monitoring events.
- The City is required to ensure that all SIUs are inspected at least once each year, and that those inspections are adequately documented.
- The City is required to ensure that the CINTAS Corporation facility adequately stores chemicals at the facility in accordance with the requirements of the facility's permit.
- The City is required to evaluate the need for the SIUs to develop and implement a slug discharge control plan (SDCP).
- The City is required to ensure that the Pipe Maintenance Services, Inc. facility properly operates and maintains the process equipment in accordance with the requirements of its permit. In addition, the City is required to ensure that the Pipe Maintenance Services, Inc. facility does not increase the use of potable water or in any other way attempt to use dilution as a method of treatment for its process wastewater. Furthermore, the City is required to ensure that the Pipe Maintenance Services, Inc. facility store the chemicals in the boiler room inside secondary containment in accordance with Part II, Item L of the permit.
- The City is required to ensure that the Thermofluids, Inc. facility is not discharging prohibited waters to the City's sewer system in accordance with section 13.28.085 of the City's SUO. In addition, the City is required to further evaluate the operations at the Thermofluids, Inc. facility and assess the facility's potential classification as a CIU.
- The City is required to ensure that it properly notifies each SIU of its status as such and of all requirements applicable to it as a result of such status.
- The City is required to ensure that it reviews and analyzes reports submitted by its Class I IUs.

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- The City is required to evaluate its permitting process and ultimately ensure that it controls through permit the contribution to the POTW by each IU to ensure compliance with the federal pretreatment regulations.
- The City is required to update its enforcement response plan (ERP) and to reference the correct City municipal codes.
- The City is required to implement its ERP for all discharge violations by its Class I IUs.
- The City is required to ensure that it has allocated the proper resources and qualified personnel to adequately implement its pretreatment program.

Recommendations for the City's pretreatment program are also included in Section 12.2 of this report. As a result of the recent inspection, several recommendations were made.

- It is strongly recommended that the City ensure that it has a current and updated written agreement in place with the Clark County Water Reclamation District that addresses the City's responsibilities for implementing the pretreatment program in the Nellis Industrial Park. Further, the City should make it a priority to identify which entity is responsible for regulating the industries within the City that discharge to Clark County.
- It is recommended that the City continue to develop its pharmaceutical take-back program.
- It is recommended that the City review trends in mercury concentrations for the WRF's influent, effluent, and sludge and continue to permit and inspect dental facilities within the service area.
- It is recommended that the City discuss and review the EPA's Safer Detergents Stewardship Initiative (SDSI) program with the industrial laundries in its service area.
- It is recommended that the City continue to develop and distribute outreach materials to residents about properly disposing of fats, oils, and grease (FOG) waste and procedures for reporting sanitary sewer overflows (SSOs).
- It is recommended that the City develop and distribute outreach materials on the proper disposal of nonwoven disposable products to protect the collection system and the POTW as a whole.
- It is recommended that the City modify the definition of SNC included in the ERP to match the definition of SNC in the SUO and to be as least as stringent as the definition provided in the federal regulations.
- It is strongly recommended that the City amend the permit to include specific information on the sampling location; this description may include a photograph or the specific location where samples should be collected.
- It is recommended that the City include more detail about the facility inspections and include information such as the condition of the pretreatment system, notes on discussions held, calibration details, and characteristics of the facility's effluent.
- It is recommended that the City conduct a followup inspection at the CINTAS Corporation facility to determine the facility's need to reinstall the pH monitoring system to conduct continuous pH monitoring and ultimately ensure that the wastewater is within the permitted pH range. In addition, it is recommended that the City inspectors become familiar with the CINTAS Corporation facility's pretreatment system and that the City recommend the facility develop written standard operating procedures (SOPs) for operating the pretreatment system in the event that Decon Water Technologies, LLC is unavailable. Furthermore, it is recommended that the City conduct a followup inspection

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at the CINTAS Corporation to ensure that chemicals are properly stored, and not within the direct vicinity of the facility's discharge/sample sump.

- It is recommended that the City conduct a thorough followup inspection of the G&K Services facility.
- It is strongly recommended that the City follow-up with the Pipe Maintenance Services, Inc. facility to ensure that the facility updates the schematics to accurately reflect the process flow taking place at the facility. In addition, it is recommended that the City conduct a followup inspection at the Pipe Maintenance Services, Inc. facility to ensure that appropriate procedures are in place to eliminate spills and/or events that may create slug-like discharges to the sanitary sewer.
- It is recommended that the City follow up with the Thermofluids, Inc. facility to ensure that chemicals are properly stored and contained. In addition, it is strongly recommended that the City conduct a followup inspection at the Thermofluids, Inc. facility to determine the potential for chemicals in the warehouse to be discharged to the sanitary sewer from the floor drain. Furthermore, the City should determine if the floor drain at the Thermofluids, Inc. facility needs a more permanent seal and should inspect the floor drain area as part of its annual inspection.
- It is recommended that the City use the EPA's model permit application form to ensure SIUs complete thorough permit applications in an effort to obtain the necessary information for properly regulating these entities.

2. Introduction

PG Environmental, LLC assisted the U.S. Environmental Protection Agency (EPA) Region 9 (collectively, the EPA Inspection Team) in conducting a pretreatment compliance inspection (inspection) of the City of North Las Vegas's (City's) industrial pretreatment program on September 29–30, 2014. This report describes the primary concerns generated by the recent inspection.

The files of six non-categorical significant industrial users (SIUs) were reviewed during the inspection to provide a general overview of the City's pretreatment program:

- Blue Beacon Truck Wash (non-categorical SIU).
- CINTAS Corporation (non-categorical SIU).
- Darling International, Inc. (non-categorical SIU).
- Pipe Maintenance Service, Inc. (non-categorical SIU).
- Sunshine Fresh, Inc. (non-categorical SIU).
- Thermofluids, Inc. (non-categorical SIU).

Onsite inspections were conducted at Biodiesel of Las Vegas, CINTAS Corporation, G&K Services, Pipe Maintenance Service, Inc., and Thermofluids, Inc. as a component of the inspection. Refer to section 9.3, *Nondomestic Discharger Site Inspections Conducted during the Inspection*, for more information on the facilities inspected.

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2.1 Size of Program

The City's pretreatment staff manages a pretreatment program that consists of 457 permitted nondomestic dischargers. City representatives stated that the City has classified 24 of the dischargers as SIUs as defined at Title 40 of the *Code of Federal Regulations* (CFR), section 403.3(v); the City permits the dischargers individually as Class I Industrial Users. The City has classified only one of these SIUs as a categorical industrial user (CIU), Las Vegas Cogeneration, as required under 40 CFR 423, Steam Electric Power Generating Point Source Category. City representatives provided a document titled "Class I Permitted Facilities" to the EPA Inspection Team. The document lists 26 Class I industries; however, 2 of the facilities, Veolia Water and Southern Nevada Detailing, were no longer in operation according to City representatives. The remaining 433 permitted nondomestic dischargers are permitted by the City as Class II Industrial Users, a category that includes vehicle wash facilities, medical facilities, automotive painting and repair facilities, paper printing facilities, construction maintenance facilities, and dental facilities.

According to the City's 2013 Annual Pretreatment Report, the City permits 19 Class I Industrial Users and 491 Class II Industrial Users. The Senior Pretreatment Inspector stated that while the City permits 24 SIUs (Class I users), only 19 of those facilities discharge to the City of North Las Vegas Water Reclamation Facility (WRF). The remaining 5 SIUs discharge to the Clark County Water Reclamation District (Clark County), along with 30 Class II Industrial Users. According to City representatives, nondomestic dischargers at several locations within the City limits discharge to Clark County. A map of the City's service area and information provided by City representatives indicate 6 SIUs that discharge to Clark County are located in the Nellis Industrial Park, on the east side of Interstate 15 near Nellis Air Force Base. Those SIUs are Basic Food Flavors, Inc.; Darling International, Inc.; G&K Services; Pipe Maintenance Service, Inc.; Sunshine Fresh, Inc.; and Superior Linen & Laundry Services. For more information on the implementation of the pretreatment program for nondomestic dischargers located within the City but discharging to Clark County, refer to section 2.1, below. The EPA Inspection Team asked the City representatives about the discrepancy between the number of SIUs provided during the inspection and the number of SIUs provided in the 2013 Annual Pretreatment Report. According to the City representatives, the previous pretreatment program supervisor was primarily responsible for regulating the Class I users, and City representatives were thus unsure why the previous supervisor reported varying numbers of SIUs. The City representatives thought that the discrepancy may be related to the fact that the previous pretreatment supervisor did not include the 6 SIUs that were located within the City limits and discharged to Clark County.

The City does not issue Class II Industrial User permits to food service establishments (FSEs), which are regulated under a different type of permit. The City permits FSEs under a "Grease Interceptor Permit." Refer to section 2.2.6, *Performance Measures*, of this report for additional details regarding the City's FSEs and Grease Interceptor Permits.

The City operates the City of North Las Vegas Water Reclamation Facility (WRF), which first became operational in 2011. The WRF receives and treats flow from the City, discharging treated wastewater to the Sloan Channel, which ultimately discharges into Lake Mead. City representatives explained that prior to the construction of the City's WRF, the City discharged a portion of its untreated wastewater to the City of Las Vegas and another portion to Clark County. The City no longer discharges wastewater to the City of Las Vegas; however, a portion of the City's untreated industrial and domestic wastewater is discharged to Clark County for treatment.

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The City's WRF has a dry weather flow capacity of 25 million gallons per day (mgd) and treats an average of 17 mgd using a submerged membrane bioreactor (MBR) technology.

The City does not accept hauled liquid waste at its WRF. City representatives stated that hauled liquid waste requests from the general public are redirected to Clark County, which accepts hauled liquid waste from the Las Vegas Valley.

2.1.1 Contributing Jurisdictions and Other Entities

According to the federal regulations at 40 CFR 403.8(f)(2)(i), the publicly owned treatment works (POTW) is required to identify and locate all possible industrial users that might be subject to the POTW's pretreatment program. City representatives explained to the EPA Inspection Team that prior to the construction of the City's WRF in 2011, a portion of the wastewater from the City's service area discharged to the City of Las Vegas and another portion discharged to Clark County. The City had previously entered into inter-local agreements with each entity regarding the discharge of the City's wastewater to each entity's collection system and treatment plant. City representatives provided the EPA Inspection Team with three inter-local contract agreements, each of which is summarized below:

- *Pretreatment Ordinance Inter-local Agreement Contract between the City of North Las Vegas and the City of Las Vegas*, dated June 6, 1990. This agreement outlines the implementation and review of each City's pretreatment ordinance. City representatives stated that since the construction of the City's WRF in 2011, the City no longer discharges wastewater to the City of Las Vegas's collection system or treatment facilities. City representatives were unsure if the inter-local agreement contract had been terminated upon completion of the City's WRF.
- *Inter-local Contract (Wastewater Service) between the City of North Las Vegas and the Clark County Sanitation District* (now the Clark County Water Reclamation District), dated November 2, 1994. This agreement outlines the conditions of wastewater service provided by Clark County to the City's service area located within the Nellis Industrial Park. Condition 5 of the agreement states, "The DISTRICT and the CITY agree to abide by the terms of the District/City industrial pretreatment agreement approved concurrently with this Agreement [described below], and as amended from time to time."
- *Inter-local Contract (Industrial Pretreatment) between the City of North Las Vegas and the Clark County Sanitation District* (now the Clark County Water Reclamation District), dated November 2, 1994. This agreement outlines the Clark County Sanitation District pretreatment regulations specific to the customers of the City of North Las Vegas (within the Nellis Industrial Park) that discharge wastewater to Clark County. Condition 3 of the agreement specifies that the City and Clark County will issue joint wastewater discharge permits to all SIUs within the Nellis Industrial Park. Condition 4 identifies the City's responsibility to draft the joint permits, conduct inspections and monitoring, and enforce Clark County Sanitation District pretreatment regulations. Condition 5 specifies the use of the Clark County Sanitation District Enforcement Response Plan to enforce the Clark County Sanitation District pretreatment regulations against any offending City customers. Condition 12 of the agreement states, "This Agreement shall be for a term of fifty (50) years or until NLV sewer service becomes available, whichever should first occur. Available is defined to mean a sewer service line within 400 feet of the customer's location with a capacity to handle the customer's discharge."

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The City's inter-local agreements with Clark County Sanitation District (now the Clark County Water Reclamation District) refer to the North Las Vegas Municipal Code 4.14; however, this reference was no longer correct as the City no longer implements this municipal code. Specifically, City representatives stated that the City's current sewer use ordinance (SUO; i.e., Chapter 13.28 of the City North Las Vegas Municipal Code) was written in approximately 1996. They did not know if the inter-local agreements had been modified, updated, or rewritten after the development of the City's SUO in 1996, or after construction of the City's WRF in 2011.

City representatives explained that the City was uncertain about pretreatment program implementation details for the SIUs located in the Nellis Industrial Park. As previously stated, the City's 2013 Annual Pretreatment Report did not identify the SIUs located within the Nellis Industrial Park as Class I Industrial Users permitted by the City. Additionally, City representatives stated that they did not know who was responsible for implementing the pretreatment program in the areas of the City that discharged to Clark County—the City or Clark County. City representatives also stated that they were unsure who was responsible for pretreatment program implementation (the City or Clark County) for a number of "border facilities" (i.e. facilities located on the border of the City limits and Clark County) that discharged to Clark County. Although it appeared that the inter-local contract between the City of North Las Vegas and Clark County dated November 2, 1994 may be void due to the availability of the City's sewer service, City representatives were not aware of another agreement defining the responsibility of each entity in implementing a pretreatment program. As a component of the inspection, the EPA Inspection Team visited the Biodiesel of Las Vegas facility that was located within the City but discharged to Clark County. City representatives did not know who was responsible for permitting, sampling, and inspecting the facility. For more information on the facility inspection, refer to section 9.3, *Nondomestic Discharger Site Inspections Conducted during the Inspection*.

Due to the lack of updated written agreements between various entities and the City regarding program implementation, and uncertainties related to the entity responsible for regulating nondomestic discharges from industrial users (IUs), the City is required to ensure that it identifies and locates all possible IUs, in accordance with the federal regulations at 40 CFR 403.8(f)(2)(i). Further, it is strongly recommended that the City ensure that it has a current and updated written agreement in place with the Clark County Water Reclamation District that addresses each entity's responsibility for implementing the pretreatment program in the Nellis Industrial Park.

2.2 Focus Topics

Before the inspection, the City was asked to complete a survey that covered the following focus topics. City representatives provided the following industrial pretreatment program information.

2.2.1 Significant Noncompliance

The City's Senior Pretreatment Inspector is responsible for calculating the number of SIUs in significant noncompliance (SNC). These calculations are completed electronically using a spreadsheet. City representatives stated that the previous pretreatment program supervisor was responsible for calculating SNC prior to his departure in July 2014. The City's 2013 Annual Pretreatment Report, completed by the previous pretreatment program supervisor, stated that the

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facility's SIUs (the 19 that discharge to the City's WRF) were in compliance during the 2013 calendar year. City representatives stated that they were unable to locate the previous supervisor's SNC calculations; therefore, they were unable to confirm that none of the City's SIUs were in SNC during the 2013 calendar year. The City is reminded that, according to 40 CFR 403.8(f)(2)(viii) of the federal regulations, the City must comply with the public participation requirements, including at least annual public notification of IUs which, at any time during the previous 12 months, were in SNC with applicable pretreatment requirements. This notification must be published in a newspaper of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW. The City is also reminded that, according to 40 CFR 403.12(o), the City is required to retain records of monitoring activities and results for a minimum of 3 years.

It should be noted that the City's SUO and enforcement response plan (ERP) did not accurately state the federal definition of SNC according to the streamlining regulations. For more information on the City's SUO, refer to section 6, *Legal Authority,* section 6.1, *Streamlining Provisions,* and section 8, *Application of Pretreatment Standards and Requirements*, of this report.

2.2.2 Pharmaceutical Recovery

The City does not have a formal pharmaceutical recovery program. However, the City contributes to the Clark County "Pain in the Drain" Web site; other contributors include Clark County, the City of Las Vegas, and the City of Henderson. The Web site describes various topics of concern related to discharges to the POTW, including fats, oils, and grease (FOG) waste disposal; pharmaceutical disposal; and illegal dumping. In addition, City representatives stated that the "Pain in the Drain" Web site identifies drop-box locations for unwanted pharmaceuticals at various Las Vegas Metropolitan Police Department substations throughout the Las Vegas Valley, two of which are located within the City limits. A link to the "Pain in the Drain" Web site is located on the "Utilities" page of the City's Web site. Furthermore, the City also directs residents to (and provides a link to) the Southern Nevada Health District Web site, which provides information regarding proper disposal of pharmaceuticals.

City representatives stated that they were considering adding pharmaceutical disposal outreach material to resident water bills and that the topic would be discussed at the next quarterly regional pretreatment coordinator meeting.

It is recommended that the City continue to develop its pharmaceutical take-back program. The City could target locations such as senior care centers, hospitals, and pharmacies. Pharmaceutical waste in the POTW's effluent can have a detrimental effect on the health of receiving waters. Pharmaceutical take-back events have proven to be a simple and effective way of reducing the harmful effects of pharmaceuticals on human health and aquatic organisms. Successful take-back programs have been implemented in California's San Francisco Bay Area by the Bay Area Pollution Prevention Group (BAPPG); EPA considers the BAPPG programs to be model systems.

2.2.3 Streamlining

The City representatives stated that the SUO had not been updated or modified since its development in approximately 1996; therefore, the City had not incorporated the mandatory and

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optional portions of the EPA's pretreatment streamlining regulations in its SUO. The EPA Inspection Team reviewed the SUO and confirmed that none of the federally required streamlining modifications were included. For more information on the City's SUO, refer to section 3, *Pretreatment Program Modifications*, section 6, *Legal Authority* and section 6.1, *Streamlining Provisions* of this report.

2.2.4 Dental Mercury

City representatives explained to the EPA Inspection Team that the City's pretreatment program issues Class II Industrial User permits to dental facilities within the City's service area. The Class II permits require the use of amalgam traps, screens, and vacuum separators. According to the information provided by City representatives, the City has identified 11 dental facilities within the service area and regulates these facilities via permits and inspections. City representatives indicated that the 11 dental facilities have traps, screens, and vacuum separators in place to collect and dispose of the dental amalgam.

The City's local limit for mercury is 0.001 milligrams per liter (mg/L). City representatives stated that the mercury levels in the City's influent and effluent have been below the detection limit. In addition, City representatives stated that data regarding mercury levels in the City's wastewater was included in the 2013 Annual Pretreatment Report; however, the EPA Inspection Team did not find this information when reviewing the 2013 Annual Pretreatment Report.

It is recommended that the City review trends in mercury concentrations for the WRF's influent, effluent, and sludge and continue to permit and inspect dental facilities within the service area.

2.2.5 Industrial Laundries

At the time of the inspection, 8 industrial laundry facilities were located within the City's service area which had been issued Class I permits. In addition, a number of commercial laundry facilities were located within the City's jurisdiction, which had been issued Class II permits.

City representatives did not know if the City had discussed the EPA's Safer Detergents Stewardship Initiative (SDSI) program with the industrial laundries. City representatives stated that the previous pretreatment program supervisor had been responsible for communicating with the City's industrial laundries, as well as conducting inspections at the facilities. City representatives also did not know if any of the 8 facilities participated in the SDSI program or made any voluntary efforts to reduce the use of nonylphenol ethoxylates (NPEs) in their operations. The Senior Pretreatment Inspector indicated that the pretreatment program staff planned to discuss the SDSI program with the industrial laundries within the City's service area.

It is recommended that the City discuss and review the EPA's SDSI program with the industrial laundries in its service area. SDSI is a voluntary program to commit to the use of safer surfactants. Safer surfactants are those which break down quickly to non-polluting compounds, helping to protect aquatic life in both freshwater and saltwater environments. NPEs are an example of a surfactant class that does not meet the definition of a safer surfactant.

2.2.6 Performance Measures

According to the information provided by the City's Utilities Operations Manager, the City experienced 6 sanitary sewer overflows (SSOs) during the 2013 calendar year. The Utilities

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Operations Manager stated that SSOs experienced in the City have primarily been attributed to accumulated debris and residential grease in the collection system. Furthermore, the Utilities Operations Manager stated that restaurants have contributed to FOG-related blockages that resulted in SSOs. The FSEs that have contributed to SSOs are monitored more frequently than FSEs without a history of contributing to SSOs.

FSEs are permitted by the City under what City representatives referred to as Grease Interceptor Permits. Chapter 13.24.080 of the City North Las Vegas Municipal Code identifies a specific permit classification as "Grease trap/interceptor." However, Chapter 13.28.150, Wastewater Contribution Permit-Classification, of the SUO does not identify "Grease trap/interceptor" as a specific classification of wastewater contribution permits. It should be noted that Chapter 13.28.210, Sand, Grease, and Oil Traps, of the SUO requires each restaurant that discharges grease waste to install and maintain an approved grease trap or oil interceptor to "prevent excessive discharges of grease and oil into the system." In addition, Chapter 13.28.210 states, "Any grease trap or oil interceptor or sand and oil interceptor that is required by this section shall be readily accessible for inspection by the authorized personnel of the City and shall be properly maintained to ensure that accumulations of grease and oil or sand and oil, as the case may be, do not impair the efficiency of the trap or interceptor or are not discharged with the effluent, or both." If the City intends to enforce Grease Interceptor Permits, then it is required to modify its SUO to ensure that it has the proper legal authority to require compliance with applicable pretreatment standards and requirements by Industrial Users, per 403.8(f)(1)(ii) (including preventing interference with the POTW and collection system).

The City provides commercial and residential outreach material for proper FOG management and disposal. As previously stated, the City contributes to the Clark County "Pain in the Drain" Web site, which offers information regarding the impact of discharging FOG-related waste to the POTW as well as proper disposal methods that should be implemented when disposing of FOG wastes. In addition, City representatives stated that the City runs informational booths at various environmental events in the Las Vegas Valley, including Earth Day and National Night Out. At these booths, the City provides the general public with FOG management information. Furthermore, City representatives stated that in the past, City inspectors provided FOG brochures to residential customers near areas where SSOs occurred; however, they were unaware if brochures were still being distributed in these areas. It is recommended that the City continue to develop and distribute outreach materials to residents about properly disposing of FOG waste and procedures for reporting SSOs. Targeted outreach should be provided to areas with a high volume of residential housing and areas with numerous FSEs.

2.2.7 Potential Cleanups or Criminal Violations

The City is unaware of facilities that might close and leave a cleanup needing public funding. The City has not identified facilities that appeared to have knowingly violated pretreatment or other environmental requirements.

2.2.8 Nonwoven Disposable Products

City representative informed the EPA Inspection Team that the collection crew has reported two events in which nonwoven disposable products had accumulated in the collection system, causing disturbances with the system pumps. City representatives stated that the City had not yet developed outreach materials for the general public describing the effects of discharging

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nonwoven disposable products to the collection system. The City's WRF Administrator currently serves on the Flushables Task Group of the Water Environment Federation; this group is tasked with helping the wastewater industry develop standards and implement practices for dealing with nonwoven disposable products in the collection systems. It is recommended that the City develop and distribute outreach materials on the proper disposal of nonwoven disposable products to protect the collection system and the POTW as a whole.

3. Pretreatment Program Modifications

The federal pretreatment regulations at 40 CFR 403.18 require the City to notify the approval authority of any modifications it intends to make to its pretreatment program.

City representatives explained that during 2009 and 2010 the City lost approximately 1,200 employees, as a result of the economic downturn. In addition, the City's previous pretreatment program supervisor unexpectedly retired in July 2014. Furthermore, City representatives explained that the majority of the City's pretreatment personnel were part time, and that currently, the City only had one fulltime pretreatment position, the Senior Pretreatment Inspector, who had recently been promoted to Pretreatment Program Supervisor (however, to avoid confusion, he is referred to as the Senior Pretreatment Inspector throughout the report).

City representatives explained to the EPA Inspection Team that the City had experienced multiple staff changes within the pretreatment program over the past 10 years and that the program has suffered as a result of these changes. City representatives explained that in 2005, the pretreatment program was re-staffed to include a new pretreatment program supervisor, a senior pretreatment inspector, and seven part-time pretreatment inspectors. The part-time pretreatment inspectors are responsible for performing compliance sampling at all permitted nondomestic dischargers, as well as conducting annual inspections at the Class II Industrial User facilities. In addition to their pretreatment responsibilities, the part-time pretreatment inspectors are responsible for cleaning and maintaining (e.g., video inspecting) the City's sanitary collection system. The Senior Pretreatment Inspector is responsible for assisting with Class II Industrial User facility annual inspections, as well as identifying and permitting new industrial users. According to City representatives, the previous pretreatment program supervisor had been the sole person conducting Class I Industrial User inspections. In addition, they stated that the City has lost two of its part-time pretreatment inspectors and that those positions were still vacant at the time of this inspection.

City representatives explained that prior to July 2014, the majority of the pretreatment program was implemented by the previous pretreatment program supervisor, with very little transparency or open communication with other City staff. They stated that since the unexpected departure of the previous pretreatment program supervisor, the Senior Pretreatment Inspector, along with other City staff, has begun reviewing the City's pretreatment program organization and implementation. The Senior Pretreatment Inspector has identified shortcomings with the program, particularly in the areas of documentation and enforcement.

The Senior Pretreatment Inspector stated that data management and managing pretreatment files were the responsibility of the previous pretreatment program supervisor, and that the majority of IU files were maintained as hardcopy files within the previous supervisor's office. City representatives stated that after his departure, the City was unable to locate a vast majority of the

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City's IU files, including monitoring data, inspection records, general correspondence, and enforcement documentation. City representatives explained that the majority of the hardcopy files were not recovered after his departure and that the City was currently going through the previous pretreatment program supervisor's computer hard drive and e-mail to recover missing information. Furthermore, they explained that they were in contact with the Class I Industrial Users, as well as with the contract laboratories, to recover missing information, particularly self-monitoring data.

The Senior Pretreatment Inspector provided laboratory data that had been received from the IUs and contract laboratories to the EPA Inspection Team, but stated that the sampling data had not been reviewed by the City. The EPA Inspection Team conducted a cursory review of a portion of the data, and identified several discharge violations. Refer to section 10, *Enforcement*, of this report for additional details regarding Class I Industrial User discharge violations.

According to City representatives, the City's SUO, Chapter 13.28 of the City of North Las Vegas Municipal Code, was developed in approximately1996, and the SUO has not been modified since. The City was in the process of preparing to modify its SUO in response to the recent staff changes; however, such modifications had not yet commenced at the time of the inspection. For more information on the City's SUO, refer to section 6, *Legal Authority,* and section 6.1, *Streamlining Provisions,* of this report.

4. Local Limits

The federal pretreatment regulations at 40 CFR 403.5(c) require POTWs to develop and enforce local limits in order to implement the general and specific prohibitions at 40 CFR 403.5(a) and (b). The pretreatment regulations also require POTWs to continue to develop these local limits as necessary and to effectively enforce the limits.

City representatives explained that when the pretreatment program was developed, the City was not responsible for treating wastewater; instead, the City was conveying domestic and industrial wastewaters from the City to the City of Las Vegas and to Clark County for treatment. Since two separate entities were receiving the City's wastewater, the City adopted two separate local limits; each set of local limits was adopted sometime between 1994 and 1996. Enforcement of the local limits for the City's IUs depended on which treatment facility received flow from the IU. In addition, City representatives stated that the limits had not been reviewed or evaluated since their adoption. Furthermore, they stated that local limits had not been developed for the City's WRF, which was constructed in 2011. Currently, the City was enforcing both the local limits developed for the City of Las Vegas Water Pollution Control Facility and the local limits for Clark County, neither of which was developed to protect the City's WRF. City representatives explained that the IUs that discharge to the City's WRF are required to comply with the local limits that were developed for the City of Las Vegas Water Pollution Control Facility. They stated that no instances of pass through, interference, or upset had occurred at the WRF from industrial discharges during 2013.

It should be noted that the City's SUO was not updated upon completion of the City's WRF in 2011; therefore, the SUO does not contain limits that were technically developed for the City's WRF treatment capacities. City representatives stated that they were aware of the need to develop new local limits for the City's WRF and that they were scheduled to meet with

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laboratory staff to discuss a new local limits technical evaluation. The City is required to conduct a technical evaluation for local limits, and to develop local limits for the City's WRF, as stated in CFR 403.5(c).

5. Nondomestic Discharger Characterization

The federal pretreatment regulations at 40 CFR 403.8(f)(2) require POTWs to develop and implement procedures to identify and locate industrial users that might be subject to the local pretreatment program. These procedures must also include proper categorization of all SIUs as defined at 40 CFR 403.3(v).

The City has implemented a number of procedures to identify and locate possible nondomestic dischargers. The City's pretreatment staff receives business license and building permit notifications from the City's Building Safety Division or Business License Division. For new building permits for potential Class I Industrial Users, the Senior Pretreatment Inspector reviews and approves the building plans. New businesses requesting a connection to the City's collection system are required to complete wastewater informational surveys.

In addition, the City's Senior Pretreatment Inspector stated that the City conducts annual audits of specific areas of interest within its service area to identify unpermitted industrial users. During audits, City inspectors conduct "knock and talks" at industries that may be operating within the City but without a wastewater contribution permit. The Senior Pretreatment Inspector stated that both Class I and Class II Industrial Users have been identified during these annual City audits. City representatives were unable to produce documentation of the annual City audits.

Additionally, according to City representatives, the City's collection system crew notifies the pretreatment staff if they notice new businesses or if they identify issues within the system while cleaning and inspecting the sewer lines, which are activities conducted on a daily basis.

City representatives stated that the City maintains open communication with both the Southern Nevada Health District and the City of North Las Vegas Fire Department regarding facilities that maintain a large quantity of hazardous waste or chemicals onsite. City representatives also stated that the pretreatment staff reviews newspapers and conducts Internet searches for potential nondomestic discharges that may be subject to regulation by the City's pretreatment program.

City representatives stated that the City's pretreatment staff maintains open communication with pretreatment staff from the surrounding municipalities located within the Las Vegas Valley. Specifically, the pretreatment program supervisors from each pretreatment program meet quarterly to discuss program implementation, recent issues, new industrial users, and any changes or modifications to state or federal pretreatment regulations.

Although City representatives mentioned several methods used to identify potential nondomestic dischargers within its service area, the City was unaware of the specific role it played in regulating potential nondomestic dischargers located within the City but discharging to Clark County. Specifically, the EPA Inspection Team asked City representatives about processes and procedures to address nondomestic dischargers in these portions of the City's service area. City representatives were unsure which entity (the City or Clark County) was ultimately responsible for implementing the pretreatment program in these areas. As a result of the aforementioned

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uncertainties regarding program implementation, the EPA Inspection Team conducted an inspection at the Biodiesel of Las Vegas facility located within the City, but that discharged to Clark County (refer to section 9.3 for further information). The City is required to ensure that it identifies and locates all possible IUs that might be subject to the POTW pretreatment program in accordance with the federal regulations at 40 CFR 403.8(f)(2)(i). Further, it is strongly recommended that the City meet with Clark County and develop a written agreement (or update the existing agreement) describing each entity's responsibility in implementing the pretreatment program.

6. Legal Authority

The federal pretreatment regulations at 40 CFR 403.8(f) require every POTW subject to the national pretreatment program to have the necessary legal authority to apply and enforce sections 307(b) and (c) and section 402(b)(8) of the Clean Water Act. As noted previously, the City last modified its SUO in 1996. City representatives stated that they were aware of the information missing from the SUO and were in the process of preparing to modify its SUO. The EPA Inspection Team requested the version of the SUO that was currently being modified by the City; however, this was not provided by the City at the time of the inspection. Therefore, the EPA Inspection Team was unable to verify that the City was in the process of modifying its SUO.

Section 13.28.025 of the City's SUO defines the term "system" as "the wastewater collection of the city [City of North Las Vegas] and/or the treatment system of the city of Las Vegas and/or Clark County sanitation district and, without limitation, includes sewer service connections and all of the facilities that are used by the city for the collection, pumping, transportation, treatment and final disposal of wastewater." The City's SUO was not updated upon completion of the City's WRF in 2011; therefore, the SUO does not identify the City's WRF as a wastewater treatment facility. In order to ensure that the City has the proper legal authority to include its WRF in the "system," the City is required to update its SUO to include information regarding the City's WRF.

In addition, it should be noted that the City's ERP identified an additional SNC criterion that was not identified in the SUO. Specifically, Criteria Item I under the ERP's definition of SNC defines an SNC criterion as "refusal by an IU to allow Control Authority personnel access to its facility." This criterion was not included in the definition of SNC in the SUO. It is recommended that the City modify its ERP to include the definition of SNC as listed in the City's SUO and at least as stringent as the definition in the federal regulations. Refusal of entry can still be a permit violation, but should not be considered an SNC criterion.

6.1 Streamlining Provisions

On October 14, 2005, EPA promulgated several changes to the general pretreatment regulations (streamlining rule). The following list indicates where to find these changes in the newly revised general pretreatment regulations at 40 CFR Part 403.

- Sampling for pollutant not present (40 CFR 403.8(f)(2)(v), 40 CFR 403.12(e)).
- General control mechanisms (40 CFR 403.8(f)(1)(iii)).
- Best management practices (BMPs) (40 CFR 403.5, 403.8(f), 403.12(b), (e), (h)).
- Slug control plans (40 CFR 403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi)).
- Equivalent concentration limits for flow-based standards (40 CFR 403.6(c)(6)).

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- Equivalent mass limits for concentration-based standards (40 CFR 403.6(c)(5)).
- Use of grab and composite samples (40 CFR 403.12(b), (d), (e), (g), (h)).
- Significant noncompliance criteria (40 CFR 403.8(f)(2)(viii)).
- Removal credits (40 CFR 403.7(h)).
- Nonsignificant CIU (40 CFR 403.3(v)(2), 403.8(f)(2)(v), (vi), 403.12(e)(1), (g), (i), (q)).
- Middle-tier CIU (40 CFR 403.8(f)(2)(v)(C), 403.12(e)(3), (i)).
- Miscellaneous changes (40 CFR 403.12(g), (j), (l), (m)).

Many of the streamlining provisions are changes that the POTW may adopt at its discretion. A few of the provisions, however, require the City to revise its legal authority. These required changes include:

- 40 CFR 403.8(f)(1)(iii)(B)(6)—clarification that slug control requirements must be referenced in SIU control mechanisms.
- 40 CFR 403.8(f)(2)(viii)(A–C) —revisions to the SNC definition.
- 40 CFR 403.12(g)—modifications to the sampling requirements and clarification of the requirement to report all monitoring results.
- 40 CFR 403.8(f)(2)(vi)—provision requiring SIUs to notify the POTW immediately of any facility changes affecting the potential for a slug discharge.

The EPA Inspection Team reviewed chapter 13.28 of the City's municipal code (SUO) and identified that the required streamlining provisions had not been added to the SUO. The City is required to update its SUO to include the required streamlining provisions, identified above.

7. Control Mechanisms

To ensure compliance with applicable pretreatment standards, the federal pretreatment regulations at 40 CFR 403.8(f)(1)(iii) require POTWs to control the discharges from nondomestic dischargers by using control mechanisms (permits or other similar means). The EPA Inspection Team reviewed the wastewater contribution permits of five of the six Class I Industrial Users files reviewed as a component of the inspection (a permit for Sunshine Fresh, Inc. was not located in the City's files during the inspection). The EPA Inspection Team observed that most of the Class I wastewater contribution permits were expired at the time of the inspection. The City's Senior Pretreatment Inspector and Operations Supervisor indicated that it was possible that some of the City's Class I users were discharging under expired permits; however, permitting the Class I users had been the responsibility of the previous pretreatment program supervisor.

Based on the information provided during the inspection, the EPA Inspection Team determined the following Class I Industrial Users were discharging wastewater to the City's WRF under expired permits:

- Blue Beacon Truck Wash – Effective April 1, 2009; Expired March 31, 2014.
- CINTAS Corporation – Effective September 1, 2009; Expired August 31, 2014.
- Darling International, Inc. – Effective February 1, 2005; Expired January 31, 2010.
- Pipe Maintenance Service, Inc. – Effective November 21, 2005; Expired November 20, 2010.

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It appeared to the EPA Inspection Team that one Class I Industrial User, Thermofluids, Inc., was discharging under an effective permit. Specifically, the City maintained an electronic copy of the facility's Class I user permit, which was reviewed as a component of the inspection. The electronic copy of the permit identifies an effective date of June 1, 2005 and an expiration date of May 31, 2010; however, the header of the electronic permit identifies an effective date of June 1, 2010 and an expiration date of May 31, 2015. In addition, a permit cover page submitted with semiannual self-monitoring data identifies a permit expiration date of May 31, 2015, with a hand-written note stating, "Date of permit to be extended by NLV – Enviro Supr. Tom Rura." The EPA Inspection Team did not identify additional documentation that indicated the facility's permit had been extended.

During the onsite inspection of CINTAS Corporation's facility, the EPA Inspection Team requested the facility's onsite copy of its Class I wastewater contribution permit, which was provided by the onsite representative. It should be noted that the permit provided to the EPA Inspection Team by the facility representative was not the same permit that was included in the City's file for the facility. The EPA Inspection Team observed that the onsite copy of the facility's permit expired on August 31, 2014 (compared to the City's version, which identified an expiration date of August 31, 2009). When asked about whether the facility was aware of the expired wastewater contribution permit, the onsite facility representative stated that the facility had reached out to the City earlier in the summer of 2014 regarding the expiration date of the permit. The onsite facility representative explained that the previous pretreatment program supervisor had instructed the facility to keep discharging under the expired permit. The onsite facility representative stated that communication between the facility and the previous pretreatment program supervisor regarding the permit expiration had been done verbally, via telephone, and that the facility had not received a notice in writing from the City about discharging to the City under an expired wastewater contribution permit. Page 2 of the expired permit states, "If the Permittee wishes to continue to discharge process industrial wastewater after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of NLVMC § 13.28.330 a minimum of 60 days prior to the expiration date."

In addition, the CINTAS Corporation Class I wastewater contribution permit, which became effective on September 1, 2009, had not been modified to correctly identify the receiving treatment plant. Specifically, page 2 of the permit states, "Please be aware that the wastewater's eventual destination is the City of Las Vegas (CLV) wastewater facilities system and treatment plant." City representatives explained to the EPA Inspection Team that the City's WRF was constructed in 2011, and that facilities that had previously discharged wastewater to the City of Las Vegas were now discharging to the City's WRF.

According to the federal regulations at 40 CFR 403.8(f)(1)(iii), the City is required to control through permit, order, or similar means, the contribution to the POTW by each IU to ensure compliance with applicable pretreatment standards and requirements. The City had developed new wastewater contribution permits for the City's Class I Industrial Users that contained an effective date of October 1, 2014, which had not yet been signed or provided to the IUs. Due to the number of expired (and thus invalid) permits issued to SIUs within the City's service area, the City is required to ensure that it issues effective permits to the SIUs in order to control the

contributed to the POTW by each IU in accordance with the federal regulations at 40 CFR 403.8(f)(1)(iii).

7.1 Notification of Significant Change in Discharge

According to the 40 CFR 403.12(j) of the federal regulations, "All IUs shall promptly notify the Control Authority in advance of any substantial change in volume or character of pollutants in their discharge." As a component of the 2014 inspection, the EPA Inspection Team reviewed the CINTAS Corporation permit, which did not contain the requirement to notify the control authority in the event of a significant change in discharge. Therefore, the City is required to ensure that the language in the permit includes the requirement for the facility to notify the City in the event of a significant change in discharge as stated at 40 CFR 403.12(j) of the federal regulations.

7.2 Sampling Location

According to 40 CFR 403.8(f)(1)(iii)(B)(4) of the federal regulations, control mechanisms must be enforceable and contain self-monitoring, sampling, reporting, and notification and recordkeeping requirements, including an identification of the pollutants to be monitored, sampling location, sampling frequency, and sample type, based on applicable general pretreatment standards. As a component of the inspection, the EPA Inspection Team reviewed the CINTAS Corporation permit issued by the City and provided to the EPA Inspection Team during the onsite inspection. According to Part 1.a of the permit, the outfall is identified as "001-plant operations." According to Part II.A of the permit, "The permittee shall sample the discharge emanating from its outfall(s) semi-annually for all parameters specified in this permit." From the information provided in Part 1.a of the permit, it is unclear where samples should be collected. It is strongly recommended that the City amend the permit to include specific information on the sampling location; this description may include a photograph or the specific location where samples should be collected. Compliance and self-monitoring samples should be collected from the same location in order to ensure consistency in sampling procedures by each entity. The City is reminded that according to 40 CFR 403.12(b)(5)(ii), samples should be representative of the facility's daily operations. Specifically, samples should be collected from a location that is representative of the facility's daily processes and should not be diluted by sources of domestic wastewater.

8. Application of Pretreatment Standards and Requirements

The federal pretreatment regulations at 40 CFR 403.8(f)(1) require the City to have the legal authority to require compliance with applicable pretreatment standards and requirements and to ensure compliance with these standards and requirements through the use of control mechanisms such as permits.

The EPA Inspection Team was unable to verify whether the City was implementing an approved pretreatment program, as required by 40 CFR 403.8. Specifically, the City's original approved pretreatment program and SUO were developed prior to the construction of the City's WRF, described in section 2.1, *Size of Program*, of this report. It did not appear that the City had modified its pretreatment program or SUO upon completion of the City's WRF. Part I.A.18 of the City's NPDES permit (NPDES No. NV0023647) requires the City to implement and enforce a pretreatment program under 40 CFR 403, including any subsequent regulatory revisions to 40 CFR 403. Additionally, according to part I.A.18.a of the City's NPDES permit, "The permittee

will comply with the Pretreatment Program as submitted to and approved by the Division [Nevada Division of Environmental Protection] and EPA. The program shall include written agreements, with all sewage agencies who contribute flows to the treatment facility, that provide the Permittee with the legal authority to enforce the pretreatment program." As required by part I.A.18.a of the NPDES permit, the City must implement an EPA-approved pretreatment program. The City is required to develop and seek approval for a pretreatment program in accordance with the federal regulations at 40 CFR 403.8(a).

9. Compliance Monitoring

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(v) require a POTW to develop and implement an inspection and monitoring program to determine, independent of information supplied by nondomestic dischargers, compliance or noncompliance with applicable pretreatment standards and requirements. Further, 40 CFR 403.8(f)(2)(vii) requires POTWs to investigate instances of noncompliance and to enforce the regulations as necessary.

9.1 Compliance Sampling

The federal regulations at 40 CFR 403.8(f)(2)(v) require all SIUs to be sampled at least once each year unless the POTW has authorized a CIU to forego sampling of a pollutant regulated by the federal pretreatment requirements. Then the POTW must sample for the waived pollutant(s) at least once during the permit term [40 CFR 403.8(f)(2)(v)(A)].

City representatives explained that the City conducts compliance monitoring events annually at each of its SIUs. City representatives stated that compliance monitoring usually occurs during one of the two semiannual SIU inspections. In addition, they explained that the previous pretreatment program supervisor had been responsible for conducting these inspections, while one of the pretreatment inspectors had conducted the compliance monitoring. The EPA Inspection Team observed that compliance sampling data was missing from the City's Class I Industrial User files; therefore the sampling frequency and adequacy could not be verified. The City is required to ensure that it samples each SIU at least once each year in accordance with 40 CFR 403.8(f)(2)(v). Additionally, according to 40 CFR 403.12(o), any IU and POTW subject to reporting requirements shall maintain records of all information resulting from any monitoring activities required by the section. The City is required to ensure that it keeps adequate records of monitoring events in accordance with the federal regulations at 40 CFR 403.12(o).

9.2 Compliance Inspections

The regulations at 40 CFR 403.8(f)(2)(v) require all SIUs to be inspected at least once each year, unless a discharger is subject to the reduced reporting requirements under 40 CFR 403.12(e)(3). The POTW must inspect those dischargers at least once every two years [40 CFR 403.8(f)(2)(v)(C)].

City representatives stated that the City conducts inspections at the SIUs semiannually. City representatives explained that inspection observations are recorded on the "City of North Las Vegas Environmental Services Division Inspection Form." A carbon copy of the inspection form is provided to the SIU after the inspection. It should be noted that inspection records were missing from the majority of the files reviewed as a component of the inspection. The EPA Inspection Team observed an inspection form dated September 23, 2014 from an inspection

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conducted at Blue Beacon Truck Wash. The inspection form contained minimal information, and it did not identify processes reviewed, quality of the effluent, chemical storage information, or required actions and additional comments. Apart from this one inspection form, City representatives were unable to produce inspection records for the other Class I Industrial User files reviewed as a component of the inspection; therefore, the EPA Inspection Team was unable to confirm that the City had conducted inspections at its Class I Industrial User facilities in 2013. The City is required to ensure that all SIU are inspected at least once each year, and that those inspections are adequately documented, as stated at 40 CFR 403.8(f)(2)(v). In addition, more detail should be provided in the reports to reflect the uniqueness of each inspection. It is recommended that the City include more detail about the facility inspections and include information such as the condition of the pretreatment system, notes on discussions held, calibration details, and characteristics of the facility's effluent. The inspection report should capture the uniqueness of what was reviewed and discussed during each inspection.

9.3 Nondomestic Discharger Site Inspections Conducted during the Inspection

Site inspections at five permitted nondomestic dischargers were conducted as part of the inspection. Individual site visit data sheets from each onsite inspection are included under Attachment 1 of this report. The EPA Inspection Team observed the following during these nondomestic discharger site visits:

- *Biodiesel of Las Vegas*. The facility manufactured biodiesel fuel. The purpose of the inspection was to identify if the facility was covered by an industrial wastewater discharge permit, and if so, which regulatory entity was responsible for issuing the permit.

  The process area was not inspected by the inspection team due to time constraints. The facility discharged process wastewater to the Clark County Water Reclamation District (CCWRD).

  Due to time restrictions, the pretreatment system was not inspected; however, the pretreatment process was verbally described to the inspection team. Refer to note 1 in the Notes section for additional information.

  During conversations with City representatives, the inspection team asked if the Biodiesel of Las Vegas facility was permitted. The City representatives did not know if the facility was permitted or which entity (i.e. the City or Clark County) was responsible for permitting the facility. The inspection team decided to inspect the facility, identify if process wastewater was generated at the facility, and if so, where it was discharged. The inspection team explained the reason for the inspection to the facility representatives and asked questions pertaining to the operations at the facility, discharge processes, wastewater pretreatment, and permitting. The facility representatives stated that Clark County has issued them an industrial wastewater discharge permit and a Clark County representative collects wastewater samples at the facility. The permit, which expired on June 30, 2014, was provided to the inspection team. Attached to the permit was a wastewater permit extension letter issued by Clark County dated July 17, 2014, stating that the 2013/2014 fiscal year permit is administratively extended until such time that Clark County re-issues the permit.

The facility representatives also stated that the facility generates wastewater, which is stored in a holding tank. The pH of the wastewater is measured and the facility releases approximately 10,000 gallons per discharge event to a lift station, which discharges to Clark County.

During conversations with City representatives prior to conducting the site visit, the inspection team found that the City was unaware if the facility was located within their service area and if the facility discharged to the City's sanitary sewer system. The City representatives explained that the facility, in addition to a number of other facilities, near the Nellis Industrial Park could discharge to Clark County even though they may be located in the City of North Las Vegas. The City referred to these facilities as "border facilities" and had not determined which entity, the City or Clark County, was responsible for regulating these facilities. According to the federal regulations at 40 CFR 403.8(f)(2)(i), the City is required to identify and locate all possible industrial users that might be subject to the POTW pretreatment program. The City is required to ensure that it identifies and locates industrial users that might be subject to the City's pretreatment program in accordance with the federal regulations at 40 CFR 403.8(f)(2)(i). It is also strongly recommended that the City communicate and work with Clark County to identify and distinguish jurisdictional responsibilities for the border facilities.

- *CINTAS Corporation.* The facility was an industrial laundry that laundered items including shop towels, restaurant towels, aprons, bath towels, floor mats, and uniforms from various industries. The facility was permitted as an SIU due to the volume of wastewater generated and discharged from the facility. The facility also dyed red shop towels and blue food service towels.

  Laundry was received at the south side of the facility and was sorted, bagged, weighed, and loaded onto a conveyor system that transported it to one of nine available washing machines. Laundry detergent and bleach were stored inside in multiple bulk containers of varying sizes, in the eastern portion of the facility near the day-use chemical storage room. All bulk detergent tanks were stored within a concrete secondary containment structure.

  Detergents and chemicals from the bulk storage area were pumped to the indoor daily-use chemical drums and tanks, where detergent and chemicals were distributed to the washing machines via an electronic chemical injection system. Laundry from the washing machines was conveyed to drying units. After the drying process, laundry could be steam-finished, pressed, or hung. The clean laundry was then sorted and shipped.

  The facility discharges pretreated wash water and rinse water from its laundry operations and general facility cleanup water. The facility's pretreatment system consists of a shaker screen unit and a dissolved air flotation (DAF) unit to settle and remove the solids.

  Wastewater generated from the facility's laundry operations is collected in two trench drains that run underneath the facility's nine washers. The two trench drains convey wastewater to two, 5,000-gallon "dirty-water pits," each of which has an aeration system.

The Production Manager did not know if the two dirty-water pits are connected to each other or which trench drains to which pit. At the time of the inspection, wastewater from the laundry operations was draining into one of the two dirty-water pits; however, both pits appeared to contain a similar level of wastewater. It appeared to the EPA Inspection Team that the two 5,000-gallon dirty-water pits were connected; however, this was not confirmed while the team was onsite.

The Production Manger stated that the dirty-water pits are aerated to enhance solids removal. Wastewater from both 5,000-gallon dirty-water pits is pumped to a shaker screen unit to remove solids, such as lint and other debris. Solid waste from the shaker screen unit is disposed of in a solid waste dumpster near the pretreatment area, and ultimately hauled offsite to the local landfill.

From the shaker screen unit, wastewater drains into a 10,000-gallon "clean dirty-water pit," which is equipped with its own aeration system. The EPA Inspection Team observed multiple pipes leading into the clean dirty-water pit, including two pipes connected to the facility's DAF unit, a pipe from the shaker screen, a pipe connected the shaker screen solids basket, a pipe from the facility's filter press, and a pipe from the equalization tank's secondary containment pit. The Production Manager stated that the two, 5,000-gallon, dirty-water pits and the single, 10,000-gallon, clean dirty-water pit are cleaned out every six months and that the City's previous pretreatment program supervisor had observed the cleaning events in person.

The wastewater from the clean dirty-water pit is pumped to an equalization tank with an approximate capacity of 30,000 gallons and a blower system to circulate wastewater within the tank. The equalization tank is located in a secondary containment pit. Coagulant is added as wastewater from the equalization tank is pumped to the DAF unit. Before entering the DAF unit, the wastewater is circulated through a spiral piping system where clay and flocculent are added. Wastewater then flows through the DAF unit and is conveyed through an unlabeled tank and into the facility's discharge/sample containment sump, which contained an open discharge pipe to the City's sanitary sewer (refer to Photograph 1 of the CINTAS Corporation Photograph Log). The unlabeled tank's outlet pipe into the discharge/sample sump contained a valve that appeared to allow wastewater from the unlabeled tank to drain back into the DAF unit. The facility representatives were unaware of the purpose of the tank.

Solids that are skimmed from the DAF unit are pumped to a filter press. Filter cake generated from the filter press is disposed of in a dumpster located near the pretreatment area. Filtrate produced at the filter press is returned, via pipe, to the clean dirty-water pit. The Production Manager stated that the solid waste dumpster is removed three times a month and emptied at the Apex landfill.

The facility does not perform continuous pH monitoring of its wastewater effluent. The EPA Inspection Team observed a pH probe and monitoring system near the unlabeled tank and discharge/sample sump; however, it was not working at the time of the inspection (refer to Photograph 1 of the CINTAS Corporation Photograph Log).

The City pretreatment inspector stated that while he is responsible for conducting compliance sampling at the City's Class I facilities (i.e., SIUs), he had not previously conducted an inspection at a Class I facility. The City's previous pretreatment program supervisor had inspected the Class I facilities.

The EPA Inspection Team observed that the facility was discharging wastewater to the City under an expired Class I Wastewater Control Permit at the time of the inspection. The Production Manager provided a copy of the facility's Class I Wastewater Control Permit to the EPA Inspection Team at the beginning of the inspection. The permit became effective on September 1, 2009 and expired on August 31, 2014. The Production Manager stated that in the summer of 2014, he had contacted the City regarding the upcoming permit expiration date and that the City's previous pretreatment coordinator verbally told him to continue operating after the expiration date of the permit. In addition, he stated that he did not receive a written confirmation from the City to continue operating under the expired permit after August 31, 2014. The federal regulations at 40 CFR 403.8(f)(1)(iii) state that a publicly owned treatment works (POTW) pretreatment program must "control through Permit, order, or similar means, the contribution to the POTW by each Industrial User to ensure compliance with applicable Pretreatment Standards and Requirements. In the case of Industrial Users identified as significant under § 403.3(v), this control shall be achieved through individual permits or equivalent individual control mechanisms issued to each such User." The City is required ensure that the facility is issued a valid permit in order to control the contribution to the POTW by the industrial user in accordance with the federal regulations at 40 CFR 403.8(f)(1)(iii).

The facility was planning to modify the pretreatment system in December 2014. Specifically, the facility was planning to install a hard-pipe connection from the 10,000-gallon clean dirty-water pit to the approximate 30,000-gallon equalization tank. At the time of the inspection, the clean dirty-water pit and equalization tank were connected via a flexible pipe that hung between the pit and the tank.

The Production Manager stated that the facility does not conduct continuous pH monitoring of the facility's discharge. The EPA Inspection Team observed a pH probe and a monitoring system control box; however, the system was inoperable at the time of the inspection (refer to Photograph 1 of the CINTAS Corporation Photograph Log). In addition, a tank with an unknown purpose was observed between the DAF unit and the facility's discharge/sample sump. The facility representatives were unaware of the purpose of the tank. Effluent from the DAF passed through the tank before entering the discharge/sample sump.

The EPA Inspection Team observed a large amount of foam at two locations: the effluent point from the DAF unit and within the discharge/sample sump (refer to Photographs 2 and 3 of the CINTAS Corporation Photograph Log). The facility's pretreatment operator present at the time of the inspection stated that foam is very common in both the DAF unit and within the discharge/sample sump due to the flocculent that is added to the wastewater upstream of the DAF unit. The facility does not conduct continuous pH monitoring; therefore, the EPA Inspection Team was unable to verify whether the foam accumulated was influencing the pH of the facility's discharge. It is recommended that the City conduct a followup inspection to determine the facility's need to reinstall the pH

monitoring system to conduct continuous pH monitoring and ultimately ensure that the wastewater is within the permitted pH range. Soaps and detergents can raise the pH of the wastewater; therefore, the City should ensure that the pH of the facility's discharge is within the permitted limits.

The Production Manager stated that a CINTAS-employee pretreatment-system operator was present at the facility during each shift, but that the facility relies on a third party, Decon Water Technologies, LLC, to operate and maintain the pretreatment system. In addition, he stated that Decon Water Technologies, LLC visits the pretreatment system monthly to maintain the system and discuss operations with the CINTAS pretreatment-system operators. Furthermore, he stated that Decon Water Technologies, LLC was responsible for providing the facility with coagulant, flocculant, and clay. It is recommended that the City inspectors become familiar with the facility's pretreatment system and that the City recommend the facility develop written standard operating procedures (SOPs) for operating the pretreatment system in the event that Decon Water Technologies, LLC is unavailable.

The EPA Inspection Team observed that the 500-gallon tank of flocculant was stored immediately up gradient of the facility's discharge/sample sump. The flocculant tank was single-walled and was not located in a secondary containment structure (refer to Photographs 4 and 5 of the CINTAS Corporation Photograph Log). In the event of a spill or leak, flocculant could potentially enter the discharge/sample sump and discharge directly to the City via the open discharge pipe. Part II, Monitoring and Reporting, Item L, Spill Containment Systems, of the facility's expired Class I Wastewater Control Permit states, "Secondary containment is required for all petroleum and chemical products in containers greater than five gallons." Therefore, the City is required to ensure that the facility store the 500-gallon tank of flocculant inside secondary containment in accordance with Part II, Item L of the permit. It is also recommended that the City conduct a follow-up inspection to ensure that chemicals are properly stored, and not within the direct vicinity of the facility's discharge/sample sump.

In addition, a 500-gallon tank of coagulant was stored inside the equalization tank containment area. It could not be determined while the EPA Inspection Team was onsite if the coagulant tank was double-walled. The EPA Inspection Team observed three floor drains at the bottom of the containment area; these drained back to the 10,000-gallon, clean dirty-water pit. The Production Manager stated that in the event of a spill or leak from the coagulant tank, the coagulant would be isolated in the clean dirty-water pit. The federal regulations at 40 CFR 403.8(f)(2)(vi) state that the POTW shall "evaluate whether each Significant Industrial User needs a plan or other action to control Slug Discharges." The EPA Inspection Team was unable to confirm if the facility had been evaluated for the need to develop a slug discharge control plan (SDCP). Due to the uncontained flocculant tank near the discharge/sample sump and the potentially uncontained coagulant tank inside the equalization tank containment area, the City is required to evaluate the need for the facility to develop a SDCP in accordance with the federal regulations at 40 CFR 403.8(f)(2)(vi).

- *G&K Services.* The facility was an industrial laundry that laundered rugs, rags/wipers, and uniforms from various clients.

  The laundry processing area and receiving and shipping areas were not reviewed or evaluated as a component of this inspection; however, the facility's water reuse and treatment system was reviewed during the inspection.

  The facility's water reuse and treatment system consisted of a mechanical oil water separator, two centrifuge-type shakers, and four ceramic filters (refer to Photograph 2 of the attached G&K Services Photograph Log). The treated wastewaters are held in storage tanks for reuse after treatment (refer to Photograph 3 of the attached G&K Services Photograph Log).The four high pressure filters were the main components of the facility's treatment and reuse system. The filters were ceramic and treated wastewater to the sub-micron level. The other key component of the system was the mechanical oil water separator unit, which was installed approximately 90 days prior to the facility inspection. The software for the separator unit was in the process of being upgraded to enhance performance efficiencies at the time of the inspection. Oils recovered from the separator unit were collected and stored in the 'Norchem Oil Storage Tank' with the capacity of approximately 2,000 gallons. The tank was pumped by an offsite hauler approximately every 11 days.

  The facility representative expressed that water was discharged to the sanitary sewer if storage capacity is not available or if the treatment quality is below reuse specifications. The facility also had a SCADA system for the operation of its water treatment and reuse system (refer to Photograph 4 of the attached G&K Services Photograph Log).

  The facility was applying an advanced wash water treatment system to their operations in an effort to reuse all wash waters. When the system does not have the storage capacity or the treatment system doesn't generate a reusable water quality, the facility discharges pretreated wash water from its laundry operations and general facility cleanup water.

  As previously mentioned, the facility had a water reuse system which allowed water at the facility to constantly be recycled throughout the laundering process. Excess wastewater or wastewater that does not meet specific parameters is treated before being discharged to the sanitary sewer. The wastewater is collected in an overflow tank where the pH of the wastewater is measured and adjusted using sulfuric acid (93%) and an automatic dosing system. The pH of the wastewater is again measured before being discharged to the sanitary sewer. The pH of the effluent at the time of the inspection was 10.42 standard units (s.u.) (refer to Photograph 1 in the attached G&K Services Photograph Log). Two 55-gallon drums of sulfuric acid within secondary containment were observed during the facility inspection.

  The City inspector had been to the facility before, but was not the typical inspector of the facility. This inspection was unannounced and the EPA Inspection Team had not previously planned to inspect the facility at the beginning of the site visit component of the inspection. However, the previous site inspection conducted earlier that day took longer than expected. The EPA Inspection Team chose to inspect this facility based on its

proximity to the previous facility's location and to ultimately maximize the EPA Inspection Team's time in the field. Due to the aforementioned time constraints, the EPA Inspection Team planned to conduct a quick inspection at the facility that mainly focused on the water treatment and reuse system at the facility (thought to take approximately 20-30 minutes). The EPA Inspection Team was delayed in a conference room for approximately 10 minutes prior to starting the inspection process. Due to the available time this activity was more of a tour than a brief inspection. The facility representatives were overwhelmed by the EPA Inspection Team's request to conduct an inspection with a team of representatives from the City, EPA, State, and a federal contractor. The facility's concerns were exacerbated by the fact the City had recently been to the facility to hold pretreatment-related discussions.

Based on the apprehension of the facility representatives and time constraints, the facility representatives were informed that the EPA Inspection Team intended to conduct an inspection of the facility's pretreatment system. The EPA Inspection Team's process for formally documenting names and titles as well as completing the field inspection form was not completed due to aforementioned complications. The facility representative's names and titles were written on a secondary field sheet so that the EPA Inspection Team could proceed with the inspection, while not heightening the representatives concerns that this visit was something other than a brief inspection of their new wastewater treatment system. (Note: The secondary field sheet was lost while in transit. Information, such as representative names and some operational specifics are not available for this report.)

The facility's file (including permit application, permit, sampling data, inspection reports, facility correspondence, and enforcement actions) was not reviewed or evaluated as a component of the field inspection or the PCI process.

The facility representatives were very proud of their water treatment and reuse system and stated to contact them in the event that additional information or inspections were needed. The EPA Inspection Team recommended that the City conduct a thorough follow-up inspection of the facility. Two observations were noted during the facility tour that requires additional information:

- Operation of the pH adjustment system:
  - What pH values activate the system's injection of acid?
  - How often is the instrumentation for the system (e.g. pH probes, chemical injection pumps, etc.) calibrated?
  - What are the set points for the pH wastewater alarm system?
- Norchem Oil Storage Tank:
  - When is the valve on the bottom of the tank used?
  - What are the operational protocols for the storage tank's use?
  - Does the facility have a slug discharge control plan?

The facility had a daily log sheet which was used to record information pertaining to the water treatment and reuse system (refer to Photograph 6 of the attached G&K Services Photograph Log).

- *Pipe Maintenance Services, Inc.* The facility cleaned grease traps and interceptors by pumping accumulated debris from the interceptors to trailer trucks. The facility stored the contents from the oil and grease interceptors onsite. The facility specialized in cleaning large interceptor structures used by large casinos within the area.

  The facility's raw materials consisted of used cooking oils in addition to grease interceptor and trap wastes. Wastes collected from servicing client's collection and storage units were processed into raw stock yellow and brown grease for sale to rendering and biodiesel facilities. The wastes were received via pumper truck and processed through a series of heated tanks and a centrifuge, referred to as a "Tricanter" (refer to Photographs 12 and 13 of the attached Pipe Maintenance Services, Inc. Photograph Log). During the inspection, the facility representative provided schematic diagrams to the EPA Inspection Team, refer to Attachments 1.a and 1.b of the Pipe Maintenance Services, Inc. Photograph Log. Attachment 1.a provides a schematic of the brown grease processing sequence and Attachment 1.b provides a schematic of the yellow grease processing sequence (refer to Photograph 14 of the attached Pipe Maintenance Services, Inc. Photograph Log). It should be noted that at the time of the inspection, the EPA Inspection Team modified the schematics to represent the current process operations.

  The facility discharged pretreated process water and wash water from its brown and yellow grease processing operations to the City's sewer system. Many of the facility's primary process units are similar to treatment technologies typically used when treating oil and grease related wastewater (i.e., DAF unit, treatment focused on oil and water separation). The facility's pretreatment system consists of an ALAR filter unit and a grease interceptor. The ALAR filter used Dicalite-Diatomite (a diatomaceous earth mixture) and a drum filter to remove oil and grease from the wastewater. The wastewater is then sent to a grease trap prior to discharging to the City's sanitary sewer.

  The City inspector accompanying the EPA Inspection Team was not responsible for inspecting this facility on a regular basis. The City inspector had been to the facility in the past to collect effluent monitoring date in order to confirm compliance with permit limits.

  The facility representative stated that maintaining employees can be challenging at times due to the nature of the work and varying hours. The facility typically has eight plant operators, three vacuum truck operators, and eight tractor trailer drivers.

  The typical hours of operation for the processing area were from midnight to 10 p.m. Most of the grease interceptor pumping was conducted during night hours.

  Wastewater flow volume from the facility varies depending upon the quality and volumes of wastes received form the grease interceptors and traps that are processed at the facility. It should be noted that a permit application for the facility was not available in facility's pretreatment file. It was unclear to the EPA Inspection Team how the volume and nature of wastewater was evaluated during the permitting process.

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The EPA Inspection Team observed significant discrepancies between the facility schematic diagrams provided during the inspection and the actual conditions observed at the facility. The following discrepancies were observed:

- Brown grease process area schematic—The schematic provided to the EPA Inspection Team (refer to Attachment 1.a of the Pipe Maintenance Services, Inc. Photograph Log) showed that the facility used a DAF unit for treatment, although the DAF unit had been replaced with the current ALAR system which was not depicted on the schematic diagram (refer to Photograph 1 of the Attached Pipe Maintenance Services, Inc. Photograph Log). The facility also used additional tanks (two-5,000 gallon finished brown oil) located adjacent to the grease separation and storage area, which were not shown on the schematic diagram. The EPA Inspection Team observed that a lime slurry was added to the brown grease process to aid in maintaining a consistent viscosity of the grease during the processing. However, this treatment step was not depicted on the facility schematic diagram provided to the EPA Inspection Team (refer to Photograph 2 of the Attached Pipe Maintenance Services, Inc. Photograph Log).

- Yellow grease process area schematic—The facility schematic diagram shows four-10 micron filters in the yellow grease processing area, however, the EPA Inspection Team observed three-10 micron filters (refer to Attachment 1.b of the Pipe Maintenance Services, Inc. Photograph Log).

It is strongly recommended that the City follow-up with the facility to ensure that the facility updates the schematic diagrams to accurately reflect the process flow occurring at the facility. The City should also obtain these updated schematic diagrams. It is also recommended that the City and facility representatives discuss the changes to the wastewater treatment process, and stress that the facility representatives notify the City prior to implementing such changes.

The EPA Inspection Team observed a number of holes at the high water mark in the grease interceptor tank (refer to Photographs 3 and 4 in the attached Pipe Maintenance Services, Inc. Photograph log). Some of the holes were used to convey pipes leading into the interceptor (refer to Photograph 3in the attached Pipe Maintenance Services, Inc. Photograph Log). However, a hole was observed in the side of the interceptor that did not house a hose or pipe (refer to Photograph 4 in the attached Pipe Maintenance Services, Inc. Photograph Log). It should be noted that the high water mark was located at the hole in the interceptor wall. Due to the condition of the interceptor, it appeared that in the event that the interceptor fills above the high level mark, oil, grease, and debris would spill onto the ground in the process area. Although secondary containment was provided for the area, the cleanup from an interceptor spill may impact the quality of the wastewater discharged to the City. According to Part B.1 of the standard conditions of the facility's permit, "The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by the permittee to achieve compliance with conditions of this permit." Due to the lack of standard operating procedures for the grease interceptor tank, the level of the high water mark in relation to the hole, and potential for overflow to spill from the tank, it appeared

that the interceptor was not being properly operated. Therefore, the City is required to ensure that the facility properly operates and maintains the process equipment in accordance with Part B.1 of the standard conditions of the facility's permit. The EPA Inspection Team also requested standard operating procedures for the interceptor, which the facility was unable to provide. It is also recommended that the City conduct a follow-up inspection to ensure that appropriate procedures are in place to eliminate spills and/or events that may create slug-like discharges to the sanitary sewer.

During the inspection of the boiler room at the facility, a black hose was observed running from a potable water source into the facility's trench drain. It was estimated that the potable water was running at about half of the capacity of the flow rate at the time of the inspection. The EPA Inspection Team traced the destination of the trench drain to a pipe, which mixed with the wastewater from the grease interceptor prior to the sampling location (refer to Photographs 5 through 11 of the attached Pipe Maintenance Services, Inc. Photograph Log). From the observations during the facility inspection, the facility was utilizing the potable water from the black hose to dilute the wastewater prior to discharging to the City's sewer. According to 40 CFR 403.6(d) of the federal regulations, "except where expressly authorized to do so by an applicable Pretreatment Standard or Requirement, no Industrial User shall ever increase the use of process water, or in any other way attempt to dilute a Discharge as a partial or complete substitute for adequate treatment to achieve compliance with a Pretreatment Standard or Requirement." A similar statement prohibiting the use of dilution as treatment is stated in Part A.9 of the standard conditions of the facility's permit. Additionally, Part A.11.b.16 of the standard conditions of the facility's permit states that no water added for the purpose of diluting wastes which would otherwise exceed the applicable maximum concentration limitations shall not be discharged into the City's sewer system. The City is required to ensure that the facility does not increase the use of potable water or in any other way attempt to use dilution as a method of treatment for its process wastewater in accordance with 40 CFR 403.6(d) of the federal regulations and Part A.9 and Part A.11.b.16 of the facility's permit.

The chemical storage area in the boiler room is serviced by a floor trench and drain. If there was a chemical spill in this area it had the potential to enter the floor drain and flow by gravity directly to the City's sewer system. Part II, Monitoring and Reporting, Item L, Spill Containment Systems, of the facility's expired Class I Wastewater Control Permit states, "Secondary containment is required for all petroleum and chemical products in containers greater than five gallons." Therefore, the City is required to ensure that the facility store the chemicals in the boiler room inside secondary containment in accordance with Part II, Item L of the permit.

The facility's current operating conditions associated with chemical storage could lead to chemical spills directly to the sanitary sewer. The federal regulations at 40 CFR 403.8(f)(2)(vi) state that the POTW shall "evaluate whether each Significant Industrial User needs a plan or other action to control Slug Discharges." The EPA Inspection Team was unable to confirm if the facility had been evaluated for the need to develop a slug discharge control plan (SDCP) due to lack of documentation. Due to the uncontained chemical storage area in the boiler room being stored within the direct vicinity of a sewer

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connection, the City is required to evaluate the need for the facility to develop a SDCP in accordance with the federal regulations at 40 CFR 403.8(f)(2)(vi).
According to the facility representative, it can take up to eight hours to clean a large grease interceptor unit, while a small restaurant grease trap may take as little as 3 minutes to clean. Some of the large interceptors can range from 20,000 to 50,000 gallons. The cleaning operation typically involves the use of a vacuum truck to clean and pump materials to a 5,000 gallon trailer for transport back to the facility for processing. The facility has four vacuum trucks and 19 tractor/trailer units. They also have a video truck, but stated that it's not used for evaluating sewer lines.

- *Thermofluids, Inc.* The facility received and recycled used antifreeze; the recycling process involved distilling and blending. The facility also accepted hauled wastewater from a satellite location (at 9 West Delhi Avenue; North Las Vegas), including wastewater and stormwater recovered from oily water separators, car wash interceptors, and water used for testing wells and underground storage tanks (hydrotesting). The wastewaters were hauled from the West Delhi Avenue facility to the Arcata Way facility, where they were pretreated prior to being discharged to the sanitary sewer.

  The facility's recycling operation consisted of distilling and purifying the used antifreeze to prepare it for reuse. The facility collected and hauled the used antifreeze from Jiffy Lube and other automotive facilities in 5,000-gallon tanker trucks. The used antifreeze was pumped from the tanker trunks to one of three 12,590-gallon storage tanks. The facility representative stated that company policy dictated filling the storage tanks to 90% of their total capacity.

  From the storage tanks, the used antifreeze was pumped to the distillation area in the main process building. There, the used antifreeze was filtered by a 10-micron filter to remove solids and debris. Next, it was pumped to what the facility representative referred to as "pretreatment tanks," each with a 6,500 gallon capacity, where it was chemically treated. After that, it was pumped to a clarifying tank and then to one of two feeder tanks. Then the antifreeze was sent through a distillation unit to remove any excess water. The treated antifreeze was stored in a different tank before undergoing a second distillation process. The antifreeze was blended with a glycol mixture to form the final product.

  The slurry from the pretreatment tanks was introduced into a filter press to form filter cake, which was hauled offsite for disposal.

  The facility did not generate or discharge wastewater from its antifreeze recycling process. The other Thermofluids facility located at West Delhi Avenue collected wastewater/stormwater from oily water separators, car wash interceptors, and hydro testing activities. The facility representative stated that the West Delhi Avenue facility treated the collected wastewater/stromwater via a gravity separator and an oil and water separator and then hauled the treated waters to the Arcata Way facility. The facility representative stated that the West Delhi Avenue facility did not have a sewer connection for discharging the collected wastewater, so the company hauled the wastewater to the Arcata Way Facility which was discharged to the City's sanitary sewer.

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The facility's wastewater pretreatment system consists of a 100-micron sock filter that removes solids from the wastewater and a granularly activated carbon (GAC) unit to further filter the wastewater prior to its discharge to the sanitary sewer. The facility representative stated that the sock filter is changed each time the facility discharges wastewater to the sanitary sewer connection. According to the facility representative, the GAC unit is changed approximately every three months.

The facility representative stated that the wastewater collected at the West Delhi Avenue facility is introduced to a gravity separator and an oil/water separator. Once the separation process is complete, the wastewater is hauled to the Arcata Way facility for further treatment and disposal to the sanitary sewer.

At the beginning of the facility inspection, the facility representative stated that the facility had a sanitary sewer connection point, located to the north of the main process building. This connection point was primarily used by Thermofluids, Inc.'s facility at 9 West Delhi Avenue (North Las Vegas) to discharge wastewater. At the 9 West Delhi Avenue facility, wastewater and stormwater recovered from oily water separators, car wash interceptors, and hydrotesting waters were collected and ultimately hauled to the Arcata Way facility for treatment and discharge to the City's sanitary sewer.

According to Chapter 13.28.085 of the City's SUO, "It is unlawful for any user to discharge or cause to be discharged into the system any rainwater, stormwater, groundwater, street drainage, subsurface drainage… or other uncontaminated water, other than air conditioning condensate." According to the information provided by the facility representative, wastewater with the potential to contain rainwater, stormwater, groundwater, and street drainage was being discharged to the sanitary sewer from the facility. The City is required to ensure that the facility is not discharging these prohibited waters to the City's sewer system, in accordance with section 13.28.085 of the City's SUO.

Although wastewater was not generated at the Arcata Way facility, potential non-hazardous oily wastes were being collected from interceptors and storm drains and were taken to the West New Delhi facility for treatment. The wastewaters were then hauled to the Arcata Way facility from the West New Delhi facility to be further treated and ultimately discharged to the City's sanitary sewer. According to the information provided by the facility representative and the observations made during the inspection, non-hazardous wastewater pumped from oily/water separators (potentially containing oily wastes) were collected from various locations and hauled from the West Delhi Avenue facility to the Arcata Way facility. At the Arcata Way facility, the wastewater was treated and discharged to the City's sanitary sewer. These activities may be indicative of the facility acting as a centralized waste treatment facility, which is subject to the categorical regulations at 40 CFR 437.

According to the federal regulations at 40 CFR 403.8(f)(2)(iii), the City is required to notify each significant industrial user of its status as such and of all requirements applicable to it as a result of such status. Due to the potential for non-hazardous oily waste to be generated, collected and hauled to the facility, and ultimately discharged to the sewer from the Arcata way facility, the City is required to further evaluate the

operations at the facility and assess the facility's potential classification as a CIU. The City is required to ensure that it properly notifies each significant industrial user of its status as such and of all requirements applicable to it as a result of such status in accordance with the federal regulations at 40 CFR 403.8(f)(2)(iii). The City should ensure that it properly classifies the facility and includes applicable categorical (including sub-category) limits within the facility's permit so that the facility is aware of what it is required to comply with.

During the inspection, the inspection team observed a significant quantity of antifreeze and other chemicals without secondary containment or other spill control measures in the chemical storage area located at the warehouse. The City inspector asked the facility representative about secondary containment for the warehouse and the facility representative responded that the facility was thinking about including a containment berm around the area. It is recommended that the City follow up with the facility to ensure that chemicals are properly stored and contained.

The floor drain located in a closet at the facility's warehouse appeared to be unintentionally blocked with solid debris, but was not completely sealed. It is strongly recommended that the City conduct a followup inspection to determine the potential for chemicals in the warehouse to be discharged to the sanitary sewer from the floor drain. Further, the City should determine if the floor drain needs a more permanent seal and should inspect the floor drain area as part of its annual inspection.

The facility representative stated that tanker truck interiors are washed at the Arcata Way facility. Specifically, the tanker truck interiors are washed between cycles when the facility switches from hauling used product to hauling fresh antifreeze (and vice versa). The facility representative stated that the wastewater from the truck washing operations was collected in a sump at the truck washing area of the facility. From there it was pumped to the 12,590-gallon storage tank, where it was stored prior to being used in the antifreeze recycling process.

9.4 Requesting, Receiving, and Analyzing Reports

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(iv) require the City to request, receive, and analyze all reports submitted by SIUs. In addition, the SIU reports must contain the information required at 40 CFR 403.12. The City received semiannual self-monitoring results from its Class I Industrial Users. The previous pretreatment program supervisor was responsible for reviewing sampling data. City representatives stated that the departure of the previous pretreatment program supervisor made it possible that the City had not reviewed all self-monitoring sampling data or reports submitted by IUs.

City representatives explained to the EPA Inspection Team that the City was in the process of reviewing its Class I Industrial User files to identify information that may be missing as a result of the recent departure of the City's previous pretreatment program supervisor. During the City's internal file review, the City discovered that it was missing a significant amount of self-monitoring data from its Class I Industrial Users. The City was in the process of contacting the Class I Industrial Users, as well as various contract laboratories, to retrieve the missing self-

monitoring data. At the time of the inspection, the self-monitoring data received from the Class I Industrial Users and contract laboratories had not been reviewed by the City.

The EPA Inspection Team reviewed self-monitoring data as a component of the inspection. According to City representatives, each permittee is required to submit a semiannual report that summarizes sample results and violations from the semiannual sampling period; the reports are due to the City in April and October of each year. In an effort to review the data submitted by the SIUs and identify potential violations, the City completes a "Sampling Data Input Worksheet" for the self-monitoring data reviewed. The form includes a box that indicates whether the information was reviewed by the City. Due to the lack of knowledge by City staff regarding the previous pretreatment supervisor's process for reviewing Class I Industrial User self-monitoring data, as well as the large amount of missing self-monitoring and compliance data in the Class I Industrial User files, it was unclear to the EPA Inspection Team whether the City was adequately reviewing all sampling data from its Class I Industrial Users. The City is required to ensure that it reviews and analyzes reports submitted by its Class I Industrial Users, as stated in 40 CFR 403.8(f)(2)(iv).

9.5 SIU Permit Applications

According to the federal regulations at 40 CFR 403.8(f)(1)(iii), the POTW is required to control through permit, order, or similar means, the contributing to the POTW by each IU to ensure compliance with applicable pretreatment standards and requirements. The EPA Inspection Team observed that the facility's Class I Industrial User files contained minimal information. Permit applications from its Class I Industrial Users were not present in the Class I Industrial User files.

According to the EPA's model permit application form for SIUs, information pertaining to the following areas and activities is requested from SIUs for proper permitting:

- General information.
- Business activity.
- Water supply.
- Sewer information.
- Wastewater discharge information.
- Characteristics of discharge.
- Wastewater treatment.
- Facility operational characteristics.
- Spill prevention.
- Best management practices.
- Non-discharged wastes.
- Authorized signatures.

In order to properly permit the SIU facilities, the City is required to evaluate its permitting process and ultimately ensure that it controls through permit the contribution to the POTW by each industrial user to ensure compliance with the federal pretreatment regulations as stated at 40 CFR 403.8(f)(1)(iii). Further, it is recommended that the City use the EPA's model permit

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application form to ensure SIUs complete thorough permit applications in an effort to obtain the necessary information for properly regulating these entities (refer to Attachment 2 of this report for the EPA's model permit application).

9.6 Slug Discharge Control Plans

The federal pretreatment regulations at 40 CFR 403.8(f)(2)(vi) require the City to evaluate each SIU, either by October 14, 2006 or within one year of the facility's becoming an SIU, to determine whether the SIU needs to develop and implement a slug discharge control plan. A slug discharge is any discharge of a non-routine, episodic nature, including an accidental spill or non-customary batch discharge [40 CFR 403.8(f)(2)(vi)]. The regulations also require an SIU to notify the POTW immediately of any changes affecting the potential for a slug discharge at its facility. In addition, the federal pretreatment regulations at 40 CFR 403.8(f)(1)(iii)(B)(6) require permits to contain requirements to control slug discharges if determined necessary by the POTW.

City representatives informed the EPA Inspection Team that the City's Class I Industrial Users had not been evaluated for the need to develop slug discharge control plans (SDCPs). The inspection form from an inspection conducted at Blue Beacon Truck Wash on September 23, 2014 did not state whether or not the facility was evaluated for the need to develop a SDCP. City representatives stated that none of the City's SIUs were required to develop and implement SDCPs at the time of the inspection.

The EPA Inspection Team observed chemical storage issues at multiple Class I Industrial Users that were visited as a component of the inspection. Refer to section 9.3, *Nondomestic Discharger Site Inspections Conducted during the Inspection*, for more information. The City is required to evaluate each of its SIUs to determine if the SIU needs to develop and implement a SDCP, as stated in 40 CFR 403.8(f)(2)(vi).

10. Enforcement

The federal pretreatment regulations at 40 CFR 403.8(f)(5) require the City to develop and implement an ERP. This plan must contain detailed procedures indicating how the City will investigate and respond to instances of industrial user noncompliance. Upon formal request for the City's ERP, City representatives stated that they were unsure if the City had a formal ERP. During the course of the inspection, the Senior Pretreatment Inspector found a copy of a document titled *Enforcement Response Plan*, and provided it to the EPA Inspection Team. The ERP was not dated, and contained references to the City of North Las Vegas's previous municipal code, Chapter 4.14, which was no longer being implemented by the City. The City is required to update its ERP and to reference the correct City municipal codes.

The EPA Inspection Team identified a number of violations in both self-monitoring sampling data and compliance sampling data that had been reviewed by the previous pretreatment program supervisor. Some of these violations are summarized in Table 1 below. The City was unable to provide documentation of enforcement actions taken by the City as a result of the sampling data violations. City representatives stated that enforcement had been the responsibility of the previous pretreatment program supervisor; therefore, they were unsure if enforcement had occurred. Enforcement documentation was not present in the Class I Industrial User files. The City is required to implement its ERP for all discharge violations by its Class I Industrial Users, as required by 40 CFR 403.8(f)(5).

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Table 1. Discharge Violations from Pipe Maintenance Services, Inc.

Date	Parameter	Result	Limit	Unit
2/9/2010	biological oxygen demand (BOD)	**3,800**	200	mg/L
2/9/2010	total dissolved solids (TDS)	**4,700**	1200	mg/L
8/10/2010	Cu	**3.49**	3.36	mg/L
11/3/2010	BOD	**7,820**	200	mg/L
11/3/2010	TDS	**2,920**	1,200	mg/L
11/3/2010	total suspended solids (TSS)	**8,880**	200	mg/L
3/1/2011	BOD	**17,000**	200	mg/L
3/1/2011	TDS	**2,956**	1,200	mg/L
3/1/2011	TSS	**17,000**	200	mg/L

Refer to Attachment 3 of this report for a full list of violations identified by the EPA Inspection Team.

The City is required by 40 CFR 403.8(f)(2)(viii) to annually publish the names of all facilities in SNC in a newspaper(s) of general circulation that provides meaningful public notice within the jurisdiction(s) served by the POTW. The City publishes notices regarding the facilities in SNC in *The Las Vegas Review Journal*. As noted in section 2.2.1, *Significant Noncompliance,* of this report, none of the City's SIUs were published in the newspaper as being in SNC. At the time of the inspection, City representatives explained that they were in the process of reacquiring monitoring data from the SIUs and contract laboratories and that they were currently unaware of any SIUs in SNC.

11. Adequacy of Pretreatment Resources

According to the federal regulations at 40 CFR 403.8(f)(3), the POTW shall have sufficient resources and qualified personnel to carry out the authorities and procedures described in paragraphs (f)(1) and (2) of this section (i.e. proper legal authority for program implementation and procedures to ensure compliance with the requirements of the Pretreatment Program.)

As previously stated, City representatives explained that the City lost approximately 1,200 employees during 2009 and 2010 as a result of the economic downturn. In addition, the City's previous pretreatment program supervisor unexpectedly retired in July 2014. Furthermore, they explained that the majority of the City's pretreatment personnel were part time, and that currently, the City only had one fulltime pretreatment position, the Senior Pretreatment Inspector, who had recently been promoted to Pretreatment Program Supervisor (however, to avoid confusion, he is referred to as the Senior Pretreatment Inspector throughout the report). As stated in previous sections of the report, the EPA Inspection Team identified a number of deficiencies with the City's pretreatment program, including lack of knowledge about the City's industrial population; lack of updated legal authority for program implementation; and significant data gaps with IU inspection reports, compliance sampling, industrial user self-

monitoring, and overall enforcement response. Due to these issues and deficiencies, the City is required to ensure that it has allocated the proper resources and qualified personnel to adequately implement its pretreatment program in accordance with the federal regulations at 40 CFR 403.8(f)(3).

12. Summary of Requirements and Recommendations

Listed below are the primary requirements and recommendations resulting from the inspection of the City's pretreatment program. For more specific information pertaining to each comment, please refer to the cited sections of the report.

12.1 Requirements

1. Due to the lack of updated written agreements between various entities and the City regarding program implementation, and uncertainties related to the entity responsible for regulating nondomestic discharges from industrial users, the City is required to ensure that it identifies and locates all possible industrial users, in accordance with the federal regulations at 40 CFR 403.8(f)(2)(i). (*Section 2.1.1, Contributing Jurisdictions and Other Entities, section 5, Nondomestic Discharger Characterization, and section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

2. FSEs are permitted by the City under what City representatives referred to as Grease Interceptor Permits. Chapter 13.24.080 of the City North Las Vegas Municipal Code identifies a specific permit classification as "Grease trap/interceptor." However, Chapter 13.28.150, Wastewater Contribution Permit-Classification, of the SUO does not identify "Grease trap/interceptor" as a specific classification of wastewater contribution permits. If the City intends to enforce Grease Interceptor Permits, then it is required to modify its SUO to ensure that it has the proper legal authority to require compliance with applicable pretreatment standards and requirements by Industrial Users, per 403.8(f)(1)(ii) (including preventing interference with the POTW and collection system). (*Section 2.2.6, Performance Measures*)

3. It should be noted that the City's SUO was not updated upon completion of the City's WRF in 2011; therefore, the SUO does not contain limits that were technically developed for the City's WRF treatment capacities. The City is required to conduct a technical evaluation for local limits, and to develop local limits for the City's WRF, as stated in CFR 403.5(c). (*Section 4, Local Limits*)

4. The City's SUO was not updated upon completion of the City's WRF in 2011; therefore, the SUO does not identify the City's WRF as a wastewater treatment facility. In order to ensure that the City has the proper legal authority to include its WRF in the "system," the City is required to update its SUO to include information regarding the City's WRF. (*Section 6, Legal Authority*)

5. The EPA Inspection Team reviewed chapter 13.28 of the City's municipal code (SUO) and identified that the required streamlining provisions had not been added to the SUO. The City is required to update its SUO to include the required streamlining provisions. (*Section 6.1, Streamlining Provisions*)

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6. Due to the number of expired (and thus invalid) permits issued to SIUs within the City's service area, the City is required to ensure that it issues effective permits to the SIUs in order to control the contributed to the POTW by each IU in accordance with the federal regulations at 40 CFR 403.8(f)(1)(iii). (*Section 7, Control Mechanisms*)

7. As a component of the 2014 inspection, the EPA Inspection Team reviewed the CINTAS Corporation permit, which did not contain the requirement to notify the control authority in the event of a significant change in discharge. The City is required to ensure that the language in its Class I and Class II permits includes the requirement for the facility to notify the City in the event of a significant change in discharge as stated at 40 CFR 403.12(j) of the federal regulations. (*Section 7.1, Notification of Significant Change in Discharge*)

8. The EPA Inspection Team was unable to verify whether the City was implementing an approved pretreatment program, as required by 40 CFR 403.8. Specifically, the City's original approved pretreatment program and SUO were developed prior to the construction of the City's WRF. The City is required to develop and seek approval for a pretreatment program in accordance with the federal regulations at 40 CFR 403.8(a). (*Section 8, Application of Pretreatment Standards and Requirements*)

9. The EPA Inspection Team observed that compliance sampling data was missing from the City's Class I Industrial User files; therefore the sampling frequency and adequacy could not be verified. The City is required to ensure that it samples each SIU at least once each year in accordance with 40 CFR 403.8(f)(2)(v). (*Section 9.1 Compliance Sampling*)

10. The EPA Inspection Team observed that compliance sampling data was missing from the City's Class I Industrial User files; therefore the sampling frequency and adequacy could not be verified. The City is required to ensure that it keeps adequate records of monitoring events in accordance with the federal regulations at 40 CFR 403.12(o). (*Section 9.1 Compliance Sampling*)

11. The EPA Inspection Team observed an inspection form dated September 23, 2014 from an inspection conducted at Blue Beacon Truck Wash. The inspection form contained minimal information, and it did not identify processes reviewed, quality of the effluent, chemical storage information, or required actions and additional comments. Apart from this one inspection form, City representatives were unable to produce inspection records for the other Class I Industrial User files reviewed as a component of the inspection; therefore, the EPA Inspection Team was unable to confirm that the City had conducted inspections at its Class I Industrial User facilities in 2013. The City is required to ensure that all SIU are inspected at least once each year, and that those inspections are adequately documented, as stated at 40 CFR 403.8(f)(2)(v). (*Section 9.2, Compliance Inspections*)

12. The EPA Inspection Team observed that the facility was discharging wastewater to the City under an expired Class I Wastewater Control Permit at the time of the inspection. The City is required ensure that the CINTAS Corporation facility is issued a valid permit in order to control the contribution to the POTW by the industrial user in accordance with

the federal regulations at 40 CFR 403.8(f)(1)(iii). (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

13. The City is required to ensure that the CINTAS Corporation facility stores its 500-gallon tank of flocculant inside secondary containment in accordance with Part II, Item L of the permit. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

14. Due to the uncontained flocculant tank near the discharge/sample sump and the potentially uncontained coagulant tank inside the equalization tank containment area at the CINTAS Corporation facility, the City is required to evaluate the need for the facility to develop a SDCP in accordance with the federal regulations at 40 CFR 403.8(f)(2)(vi). (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection and section 9.6, Slug Discharge Control Plans*)

15. Due to the lack of SOPs, the significance of the hole, the level of the high water mark in relation to the hole, and potential for overflow to spill from the tank, it appeared that the process interceptor was not being properly operated at the Pipe Maintenance Services, Inc. facility. The City is required to ensure that the Pipe Maintenance Services, Inc. facility properly operates and maintains the process equipment in accordance with Part B.1 of the standard conditions of the facility's permit. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

16. From the observations noted during the Pipe Maintenance Services, Inc. facility inspection, the facility was utilizing the potable water source from the black hose to dilute the wastewater prior to discharging to the City's sewer. According to 40 CFR 403.6(d) of the federal regulations, "except where expressly authorized to do so by an applicable Pretreatment Standard or Requirement, no Industrial User shall ever increase the use of process water, or in any other way attempt to dilute a Discharge as a partial or complete substitute for adequate treatment to achieve compliance with a Pretreatment Standard or Requirement." A similar statement prohibiting the use of dilution as treatment is stated in Part A.9 of the standard conditions of the facility's permit. Additionally, Part A.11.b.16 of the standard conditions of the facility's permit states that no water added for the purpose of diluting wastes which would otherwise exceed the applicable maximum concentration limitations shall not be discharged into the City's sewer system. The City is required to ensure that the Pipe Maintenance Services, Inc. facility does not increase the use of potable water or in any other way attempt to use dilution as a method of treatment for its process wastewater in accordance with 40 CFR 403.6(d) of the federal regulations and Part A.9 and Part A.11.b.16 of the facility's permit. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

17. The chemical storage area in the Pipe Maintenance Services, Inc. facility boiler room is serviced by a floor trench and drain. If there was a chemical spill in this area it had the potential to enter the floor drain and flow by gravity directly to the City's sewer system. The City is required to ensure that the Pipe Maintenance Services, Inc. facility store the chemicals in the boiler room inside secondary containment in accordance with Part II,

Item L of the permit. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

18. The EPA Inspection Team was unable to confirm if the Pipe Maintenance Services, Inc. facility had been evaluated for the need to develop a SDCP due to lack of documentation. Due to the uncontained chemical storage area in the boiler room being stored within the direct vicinity of a sewer connection, the City is required to evaluate the need for the Pipe Maintenance Services, Inc. facility to develop a SDCP in accordance with the federal regulations at 40 CFR 403.8(f)(2)(vi). (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection and section 9.6, Slug Discharge Control Plans*)

19. According to the information provided by the Thermofluids, Inc. facility representative, wastewater with the potential to contain rainwater, stormwater, groundwater, and street drainage was being discharged to the sanitary sewer from the facility. The City is required to ensure that the Thermofluids, Inc. facility is not discharging prohibited waters to the City's sewer system in accordance with section 13.28.085 of the City's SUO. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

20. Due to the potential for non-hazardous oily waste to be generated, collected and hauled to the Thermofluids, Inc. facility, and ultimately discharged to the sewer from the Arcata way facility, the City is required to further evaluate the operations at the Thermofluids, Inc. facility and assess the facility's potential classification as a CIU. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

21. The City is required to ensure that it properly notifies each SIU of its status as such and of all requirements applicable to it as a result of such status in accordance with the federal regulations at 40 CFR 403.8(f)(2)(iii). (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

22. Due to the lack of knowledge by City staff regarding the previous pretreatment supervisor's process for reviewing Class I Industrial User self-monitoring data, as well as the large amount of missing self-monitoring and compliance data in the Class I Industrial User files, it was unclear to the EPA Inspection Team whether the City was adequately reviewing all sampling data from its Class I Industrial Users. The City is required to ensure that it reviews and analyzes reports submitted by its Class I Industrial Users, as stated in 40 CFR 403.8(f)(2)(iv). (*Section 9.4, Requesting, Receiving, and Analyzing Reports*)

23. The City is required to evaluate its permitting process and ultimately ensure that it controls through permit the contribution to the POTW by each industrial user to ensure compliance with the federal pretreatment regulations as stated at 40 CFR 403.8(f)(1)(iii). (*Section 9.5, SIU Permit Applications*)

24. The City is required to evaluate each of its SIUs to determine if the SIU needs to develop and implement a SDCP, as stated in 40 CFR 403.8(f)(2)(vi). (*Section 9.6, Slug Discharge Control Plans*)

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25. Upon formal request for the City's ERP, City representatives stated that they were unsure if the City had a formal ERP. During the course of the inspection, the Senior Pretreatment Inspector found a copy of a document titled *Enforcement Response Plan*, and provided it to the EPA Inspection Team. The ERP was not dated, and contained references to the City of North Las Vegas's previous municipal code, Chapter 4.14, which was no longer being implemented by the City. The City is required to update its ERP and to reference the correct City municipal codes. (*Section 10, Enforcement*)

26. The EPA Inspection Team identified a number of violations in both self-monitoring sampling data and compliance sampling data that had been reviewed by the previous pretreatment program supervisor. The City was unable to provide documentation of enforcement actions taken by the City as a result of the sampling data violations. City representatives stated that enforcement had been the responsibility of the previous pretreatment program supervisor; therefore, they were unsure if enforcement had occurred. Enforcement documentation was not present in the Class I Industrial User files. The City is required to implement its ERP for all discharge violations by its Class I Industrial Users, as required by 40 CFR 403.8(f)(5). (*Section 10, Enforcement*)

27. As stated in previous sections of the report, the EPA Inspection Team identified a number of deficiencies with the City's pretreatment program, including lack of knowledge about the City's industrial population; lack of updated legal authority for program implementation; and significant data gaps with IU inspection reports, compliance sampling, industrial user self-monitoring, and overall enforcement response. Due to these issues and deficiencies, the City is required to ensure that it has allocated the proper resources and qualified personnel to adequately implement its pretreatment program in accordance with the federal regulations at 40 CFR 403.8(f)(3). (*Section 11, Adequacy of Pretreatment Resources*)

12.2 Recommendations

1. It is strongly recommended that the City ensure that it has a current and updated written agreement in place with the Clark County Water Reclamation District that addresses the City's responsibilities for implementing the pretreatment program in the Nellis Industrial Park. Further, the City should make it a priority to identify which entity is responsible for regulating the industries within the City that discharge to Clark County. (*Section 2.1.1,Contributing Jurisdictions and Other Entities and section 5, Nondomestic Discharger Characterization*)

2. It is recommended that the City continue to develop its pharmaceutical take-back program. (*Section, 2.2.2, Pharmaceutical Recovery*)

3. City representatives stated that data regarding mercury levels in the City's wastewater was included in the 2013 Annual Pretreatment Report; however, the EPA Inspection Team did not find this information when reviewing the 2013 Annual Pretreatment Report. It is recommended that the City review trends in mercury concentrations for the WRF's influent, effluent, and sludge and continue to permit and inspect dental facilities within the service area. (*Section 2.2.4, Dental Mercury*)

4. City representatives did not know if the City had discussed the EPA's SDSI program with the industrial laundries. City representatives stated that the previous pretreatment program supervisor had been responsible for communicating with the City's industrial laundries, as well as conducting inspections at the facilities. City representatives also did not know if any of the eight facilities participated in the SDSI program or made any voluntary efforts to reduce the use of NPEs in their operations. It is recommended that the City discuss and review the EPA's SDSI program with the industrial laundries in its service area. (*Section 2.2.5, Industrial Laundries*)

5. City representatives stated that in the past, City inspectors provided FOG brochures to residential customers near areas where SSOs occurred; however, they were unaware if brochures were still being distributed in these areas. It is recommended that the City continue to develop and distribute outreach materials to residents about properly disposing of FOG waste and procedures for reporting SSOs. (*Section 2.2.6, Performance Measures*)

6. City representatives stated that the City had not yet developed outreach materials for the general public describing the effects of discharging nonwoven disposable products to the collection system. It is recommended that the City develop and distribute outreach materials on the proper disposal of nonwoven disposable products to protect the collection system and the POTW as a whole. (*Section 2.2.8, Nonwoven Disposable Products*)

7. The City's ERP identified an additional SNC criterion that was not identified in the SUO. Specifically, Criteria Item I under the ERP's definition of SNC defines an SNC criterion as "refusal by an IU to allow Control Authority personnel access to its facility." This criterion was not included in the definition of SNC in the SUO. It is recommended that the City modify its ERP to include the definition of SNC as listed in the City's SUO and to be as least as stringent as the definition in the federal regulations. Refusal of entry can still be a permit violation, but should not be considered an SNC criterion. (*Section 6, Legal Authority*)

8. As a component of the inspection, the EPA Inspection Team reviewed the CINTAS Corporation permit issued by the City and provided to the EPA Inspection Team during the onsite inspection. According to Part 1.a of the permit, the outfall is identified as "001-plant operations." According to Part II.A of the permit, "The permittee shall sample the discharge emanating from its outfall(s) semi-annually for all parameters specified in this permit." From the information provided in Part 1.a of the permit, it is unclear where samples should be collected. It is strongly recommended that the City amend the permit to include specific information on the sampling location; this description may include a photograph or the specific location where samples should be collected. (*Section 7.2, Sampling Location*)

9. The EPA Inspection Team observed an inspection form dated September 23, 2014 from an inspection conducted at Blue Beacon Truck Wash. The inspection form contained minimal information, and it did not identify processes reviewed, quality of the effluent, chemical storage information, or required actions and additional comments. It is

recommended that the City include more detail about the facility inspections and include information such as the condition of the pretreatment system, notes on discussions held, calibration details, and characteristics of the facility's effluent. (*Section 9.2, Compliance Inspections*)

10. It is recommended that the City conduct a followup inspection at the CINTAS Corporation facility to determine the facility's need to reinstall the pH monitoring system to conduct continuous pH monitoring and ultimately ensure that the wastewater is within the permitted pH range. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

11. It is recommended that the City inspectors become familiar with the CINTAS Corporation facility's pretreatment system and that the City recommend the facility develop written SOPs for operating the pretreatment system in the event that Decon Water Technologies, LLC is unavailable. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

12. It is recommended that the City conduct a follow-up inspection at the CINTAS Corporation to ensure that chemicals are properly stored, and not within the direct vicinity of the facility's discharge/sample sump. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

13. The facility representatives were very proud of their water treatment and reuse system and stated to contact them in the event that additional information or inspections were needed. It is recommended that the City conduct a thorough follow-up inspection of the G&K Services facility. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

14. It is strongly recommended that the City followup with the Pipe Maintenance Services, Inc. facility to ensure that the facility updates the schematics to accurately reflect the process flow taking place at the facility. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

15. It is recommended that the City conduct a followup inspection at the Pipe Maintenance Services, Inc. facility to ensure that appropriate procedures are in place to eliminate spills and/or events that may create slug-like discharges to the sanitary sewer. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

16. It is recommended that the City follow up with the Thermofluids, Inc. facility to ensure that chemicals are properly stored and contained. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

17. It is strongly recommended that the City conduct a followup inspection at the Thermofluids, Inc. facility to determine the potential for chemicals in the warehouse to be discharged to the sanitary sewer from the floor drain. Further, the City should determine if the floor drain at the Thermofluids, Inc. facility needs a more permanent seal and should inspect the floor drain area as part of its annual inspection. (*Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection*)

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18. It is recommended that the City use the EPA's model permit application form to ensure SIUs complete thorough permit applications in an effort to obtain the necessary information for properly regulating these entities. (*Section 9.5, SIU Permit Applications*)

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ICIS WENDB DATA ENTRY WORKSHEET

PRETREATMENT COMPLIANCE INSPECTIONS/INSPECTIONS

► TYPE OF COMPLIANCE MONITORING: **PCI**

► NAME OF PRETREATMENT PROGRAM: **City of North Las Vegas**

► CONTROLLING AUTHORITY NPDES ID: **NV0023647**

START DATE OF INSPECTION ..... 9/29/2014 | ► END DATE OF INSPECTION 9/30/2014

LEAD INSPECTOR (Name, Company, Phone, E-mail [if available]):
Kettie Holland; PG Environmental; 303-279-1778

ACCOMPANYING INSPECTOR(s) (Name, Company, Phone, E-mail [if available]):
Danny O'Connell; PG Environmental; 303-279-1778
Anthony D'Angelo; PG Environmental; 303-279-1778

SIGNIFICANT INDUSTRIAL USERS (SIUs)	PCI CHECKLIST REFERENCE	PCA CHECKLIST REFERENCE	DATA
► SIUs* :	II.B.2.a	I.C.4.a	24
► SIUs Without Control Mechanism:	II.C.1.c	I.D.1 and II.A	23
► SIUs Not Inspected:	II.E.2.c	I.F.2.c	Unknown
► SIUs Not Sampled:	II.E.2.b	I.F.2.b	Unknown
► SIUs in SNC with Pretreatment Standards** :	II.F.3.a	I.F.3.a	0
► SIUs in SNC with Reporting Requirements:	II.F.3.a	I.F.3.a	0
SIUs in SNC with Pretreatment Schedule:		I.F.3.a	0
SIUs in SNC Published in Newspaper:		I.G.4; II.D.7	0
Criminal Suits Filed Against SIUs:	II.F.1		0
CATEGORICAL INDUSTRIAL USERS (CIUs)			
► CIUs:		I.C.4.a	1
OTHER INFORMATION			
Pass-Through/Interference Indicator *(none, Yes, or No)*		I.G.6	No
DEFICIENCIES			
Control Mechanism Deficiencies *(No or Yes)*		I.D.1;II.A.4	Yes
Inadequacy of Sampling and Inspections *(No or Yes)*		II.C and Site Visit Sheets	Yes
Adequacy of Pretreatment Resources *(Yes or No)*		I.I	No

FOOTNOTES:
► denotes required information
* The number of SIUs entered into PCS is based on the CA's definition of "Significant Industrial User."
** AS DEFINED IN EPA's 1986 Pretreatment Compliance Monitoring and Enforcement Guidance.

DATA ENTRY WORKSHEET COMPLETED BY:	Anthony D'Angelo	DATE:	12/02/2014
TITLE:	Environmental Scientist	TELEPHONE NO.:	303-279-1778

RNC DATA ENTRY WORKSHEET

RNC DATA ENTRY WORKSHEET			
INSTRUCTIONS: Enter the data provided by the specific checklist questions that are referenced.			
City of North Las Vegas			
NPDES number NV0023647			
Date of inspection 9/29–30/2014		Date entered into PCS	
		Level	Checklist Reference
NA	Failure to enforce against pass through and/or interference	I	II.F.6.b&9
NA	Failure to submit required reports within 30 days	I	Att. A.A.3
NA	Failure to meet compliance schedule milestone date within 90 days	I	Att. A.A.4
Y	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II	II.C.1.b&2
NA	Failure to inspect or sample 80% of SIUs within the last 12 months	II	II.E.2
Y	Failure to enforce pretreatment standards and reporting requirements	II	II.F.2
NA	Other (specify)	II	

SNC

NA	CA in SNC for violation of any Level I criterion
Y	CA in SNC for violation of two or more Level II criterion

For more information on RNC, please refer to EPA's 1990 Guidance for Reporting and Evaluating POTW Noncompliance with Pretreatment Implementation Requirements

RNC WORKSHEET COMPLETED BY:	Anthony D'Angelo	DATE:	12/02/2014
TITLE:	Environmental Scientist	TELEPHONE:	303-279-1778

Attachment 1

Site Visit Data Sheets

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Biodiesel of Las Vegas

Site Visit Data Sheet

ED_002461_00010486-00049

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.						
Name of Industry: Biodiesel of Las Vegas						
Address of Industry: 5233 East El Campo Grande Avenue; North Las Vegas, NV 89115						
Date of visit: 9/30/2014			Time of visit: 10:00 a.m.			
Name of inspector(s): Dominic Marvelli, Pretreatment Inspector, City of North Las Vegas (City) Nikita Lingenfelter, Nevada Division of Environmental Protection Kettie Holland, EPA Contractor, PG Environmental, LLC						
Provide the name(s) and title(s) of industry representative(s)						
Name			**Title**		**Phone/Email**	
Don Vines			Chief Maintenance Engineer		dvines@nclasvegas.com	
Brian (last name not provided)			Not provided.		Not provided.	
IU Permit Number: CCWRD-094 (issued by the Clark County Water Reclamation District)			Exp Date: 6/30/2014 Refer to note 1 in the Notes section.		IU Classification: Non-categorical significant industrial user (SIU).	
Inspection Type/Purpose		Scheduled	X	Unscheduled		PCA
	X	PCI		New Company		Complaint
Please provide the following documentation:						
1.	Nature of operation: The facility manufactured biodiesel fuel. The purpose of the inspection was to identify if the facility was covered by an industrial wastewater discharge permit, and if so, which regulatory entity was responsible for issuing the permit. Refer to note 1 in the Notes section for further information.					
2.	Number of employees	Not reviewed (N/R).	Number of shifts:	N/R.	Hours of operation:	N/R.
3.	Water source: N/R.					
4.	Wastestream flow(s) discharged to the POTW: The facility discharged process wastewater to the Clark County Water Reclamation District (CCWRD).					
Sanitary:	N/R.	Process:	N/R.	Combined:	N/R.	
5.	Describe any significant changes in process or flow: No significant changes in process or flow were observed during the time of the inspection.					
6.	Type of pretreatment system (Describe): Due to time restrictions, the pretreatment system was not inspected; however, the pretreatment process was verbally described to the inspection team. Refer to note 1 in the Notes section for additional information.					
	Continuous flow	X	Batch		Combined	
7.	Condition/operation of pretreatment system (Describe): The pretreatment system was not inspected during the inspection.					
	Any unusual conditions or problems with the pretreatment system: N/R.					
8.	Process area description (identify raw materials and processes used): The process area was not inspected by the inspection team due to time constraints.					
9.	Condition/operation of process area (Describe): N/R.					
	Any unusual conditions or problems with the process area: Not applicable (N/A).					

10.	General housekeeping in process area (Describe): N/R.					
	Any unusual conditions or problems with general housekeeping in process area: N/A.					
11.	Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): N/R.					
	Any floor drains?	N/R.	Any spill control measures?	N/R.		
	General housekeeping of chemical storage area (Describe): N/A.					
12.	Are hazardous wastes drummed and labeled? N/R.					
13.	Does the IU have hazardous waste manifests? N/R.					
	Any problems associated with hazardous waste: N/A.					
14.	Solid waste production: N/R.					
	Solid waste disposal method(s): N/A.					
15.	Description of sample location: N/R.					
	Sampling method/technique: N/R.					
16.	Evaluation of self-monitoring data?		Yes	X	No	N/A
	If yes, was self-monitoring adequate: N/A.					
17.	Who performs the self-monitoring analysis? N/R.					

Notes:

1. During conversations with City representatives, the inspection team asked if the Biodiesel of Las Vegas facility was permitted. The City representatives did not know if the facility was permitted or which entity (i.e. the City or Clark County) was responsible for permitting the facility. The inspection team decided to inspect the facility, identify if process wastewater was generated at the facility, and if so, where it was discharged. The inspection team explained the reason for the inspection to the facility representatives and asked questions pertaining to the operations at the facility, discharge processes, wastewater pretreatment, and permitting. The facility representatives stated that Clark County has issued them an industrial wastewater discharge permit and a Clark County representative collects wastewater samples at the facility. The permit, which expired on June 30, 2014, was provided to the inspection team. Attached to the permit was a wastewater permit extension letter issued by Clark County dated July 17, 2014, stating that the 2013/2014 fiscal year permit is administratively extended until such time that Clark County re-issues the permit.

   The facility representatives also stated that the facility generates wastewater, which is stored in a holding tank. The pH of the wastewater is measured and the facility releases approximately 10,000 gallons per discharge event to a lift station, which discharges to Clark County.

   During conversations with City representatives prior to conducting the site visit, the inspection team found that the City was unaware if the facility was located within their service area and if the facility discharged to the City's sanitary sewer system. The City representatives explained that the facility, in addition to a number of other facilities, near the Nellis Industrial Park could discharge to Clark County even though they may be located in the City of North Las Vegas. The City referred to these facilities as "border facilities" and had not determined which entity, the City or Clark County, was responsible for regulating these facilities. According to the federal regulations at 40 CFR 403.8(f)(2)(i), the City is required to identify and locate all possible industrial users that might be subject to the POTW pretreatment program. The City is required to ensure that it identifies and locates industrial users that might be subject to the City's pretreatment program in accordance with the federal regulations at 40 CFR 403.8(f)(2)(i). It is also strongly recommended that the City communicate and work with Clark County to identify and distinguish jurisdictional responsibilities for the border facilities.

CINTAS Corporation

Site Visit Data Sheet

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SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.						
Name of Industry: CINTAS Corporation						
Address of Industry: 2460 Kiel Way; North Las Vegas, NV 89030						
Date of visit: 9/30/2014			Time of visit: 9:20 a.m.			
Name of inspector(s): Lloyd Schafer, Pretreatment Inspector, City of North Las Vegas (City) Kirk Medina, Utilities Operations Manager, City Anthony D'Angelo, EPA Contractor, PG Environmental, LLC Jim Polek, EPA Region 9 See note 1 in the Notes section of this report for additional details.						
Provide the name(s) and title(s) of industry representative(s)						
Name			**Title**		**Phone/Email**	
James "Jim" Cain III			Production Manager		702-649-7511 Ext. 33046 / Cainj@CINTAS.com	
Richard (last name unknown)			Pretreatment System Operator		Information not provided.	
IU Permit Number: CLV-10 (Class I Permit)			Exp Date: August 31, 2014. See note 2 in the Notes section of this report for additional details.		IU Classification: Non-categorical significant industrial user (SIU).	
Inspection Type/Purpose		Scheduled	X	Unscheduled		PCA
	X	PCI		New Company		Complaint
Please provide the following documentation:						
1. Nature of operation: The facility was an industrial laundry that laundered items including shop towels, restaurant towels, aprons, bath towels, floor mats, and uniforms from various industries. The facility was permitted as an SIU due to the volume of wastewater generated and discharged from the facility. The facility also dyed red shop towels and blue food service towels.						
2. Number of employees	125	Number of shifts:	3	Hours of operation:	24 hours per day, Monday–Friday; also typically operates one weekend day per month.	
3. Water source: City of North Las Vegas						
4. Wastestream flow(s) discharged to the POTW: The facility discharges pretreated wash water and rinse water from its laundry operations and general facility cleanup water.						
Sanitary:	Not reviewed (N/R).	Process:	30,000–35,000 gallons per day (gpd)	Combined:	N/R.	
5. Describe any significant changes in process or flow: No significant changes in process or flow were observed at the facility during the inspection. See note 3 in the Notes section of this report for additional details.						
6. Type of pretreatment system (Describe): The facility's pretreatment system consists of a shaker screen unit and a dissolved air flotation (DAF) unit to settle and remove the solids.						

Wastewater generated from the facility's laundry operations is collected in two trench drains that run underneath the facility's nine washers. The two trench drains convey wastewater to two, 5,000-gallon "dirty-water pits," each of which has an aeration system. The Production Manager did not know if the two dirty-water pits are connected to each other or which trench drains to which pit. At the time of the inspection, wastewater from the laundry operations was draining into one of the two dirty-water pits; however, both pits appeared to contain a similar level of wastewater. It appeared to the EPA Inspection Team that the two 5,000-gallon dirty-water pits were connected; however, this was not confirmed while the team was onsite.

The Production Manger stated that the dirty-water pits are aerated to enhance solids removal. Wastewater from both 5,000-gallon dirty-water pits is pumped to a shaker screen unit to remove solids, such as lint and other debris. Solid waste from the shaker screen unit is disposed of in a solid waste dumpster near the pretreatment area, and ultimately hauled offsite to the local landfill.

From the shaker screen unit, wastewater drains into a 10,000-gallon "clean dirty-water pit," which is equipped with its own aeration system. The EPA Inspection Team observed multiple pipes leading into the clean dirty-water pit, including two pipes connected to the facility's DAF unit, a pipe from the shaker screen, a pipe connected the shaker screen solids basket, a pipe from the facility's filter press, and a pipe from the equalization tank's secondary containment pit. The Production Manager stated that the two, 5,000-gallon, dirty-water pits and the single, 10,000-gallon, clean dirty-water pit are cleaned out every six months and that the City's previous pretreatment program supervisor had observed the cleaning events in person.

The wastewater from the clean dirty-water pit is pumped to an equalization tank with an approximate capacity of 30,000 gallons and a blower system to circulate wastewater within the tank. The equalization tank is located in a secondary containment pit. Coagulant is added as wastewater from the equalization tank is pumped to the DAF unit. Before entering the DAF unit, the wastewater is circulated through a spiral piping system where clay and flocculent are added. Wastewater then flows through the DAF unit and is conveyed through an unlabeled tank and into the facility's discharge/sample containment sump, which contained an open discharge pipe to the City's sanitary sewer. The unlabeled tank's outlet pipe into the discharge/sample sump contained a valve that appeared to allow wastewater from the unlabeled tank to drain back into the DAF unit. The facility representatives were unaware of the purpose of the tank.

Solids that are skimmed from the DAF unit are pumped to a filter press. Filter cake generated from the filter press is disposed of in a dumpster located near the pretreatment area. Filtrate produced at the filter press is returned, via pipe, to the clean dirty-water pit. The Production Manager stated that the solid waste dumpster is removed three times a month and emptied at the Apex landfill.

The facility does not perform continuous pH monitoring of its wastewater effluent. The EPA Inspection Team observed a pH probe and monitoring system near the unlabeled tank and discharge/sample sump; however, it was not working at the time of the inspection. See note 4 in the Notes section of this report for additional details.

NOTE: The pretreatment system is reported as it was observed during the time of this inspection.

X	Continuous flow		Batch		Combined

7.	Condition/operation of pretreatment system (Describe): The facility's pretreatment system appeared to be operating properly at the time of the inspection; however, the EPA Inspection Team observed a large amount of foam at the DAF effluent pipe and inside the discharge sump/sample location. See note 5 in the Notes section of this report for additional details. The pretreatment system area was organized and free debris. The pretreatment system, which includes the two dirty-water pits, the clean dirty-water pit, an equalization tank, the DAF unit, a shaker screen unit, and the filter press, was located under cover in the northeastern corner of the facility. The solid waste dumpster used to store the shaker screen and filter press solid waste and filter cake was stored outside; however, the dumpster was equipped with a cover. The Production Manager stated that a CINTAS-employee pretreatment-system operator was present at the facility during each shift but that the facility relies on a third party, Decon Water Technologies, LLC, to operate and maintain the pretreatment system. See note 6 in the Notes section of this report for additional details.
	Any unusual conditions or problems with the pretreatment system: The EPA Inspection Team observed a large amount of foam at the DAF effluent pipe and inside the discharge sump/sample location. See note 5 in the Notes section of this report for additional details.
8.	Process area description (identify raw materials and processes used): Laundry was received at the south side of the facility and was sorted, bagged, weighed, and loaded onto a conveyor system that transported it to one of nine available washing machines. Laundry detergent and bleach were stored inside in multiple bulk containers of varying sizes, in the eastern portion of the facility near the day-use chemical storage room. All bulk detergent tanks were stored within a concrete secondary containment structure. Detergents and chemicals from the bulk storage area were pumped to the indoor daily-use chemical drums and tanks, where detergent and chemicals were distributed to the washing machines via an electronic chemical injection system. Laundry from the washing machines was conveyed to drying units. After the drying process, laundry could be steam-finished, pressed, or hung. The clean laundry was then sorted and shipped.
9.	Condition/operation of process area (Describe): All washing and drying machines at the facility were located within an enclosed gated area for safety reasons. The process areas were generally organized as the majority of laundry was conveyed through the facility via an overhead conveyance system.
	Any unusual conditions or problems with the process area: No unusual conditions or problems were observed with the process area during the time of the inspection.
10.	General housekeeping in process area (Describe): The process area was relatively clean and organized.
	Any unusual conditions or problems with general housekeeping in process area: No unusual conditions or problems were observed with the housekeeping of the process area during the time of the inspection.
11.	Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): There were three main chemical storage areas at the facility. The following observations were made pertaining to chemical storage during the inspection: • <u>Indoor bulk chemical storage area</u> – This chemical storage area was located inside and the tanks were either double-walled or stored within a secondary containment structure. The area contained the following chemicals: - 700-gallon tank of bleach. - Unknown-sized tank of Advance laundry detergent (alcohois C-10-16 ethoxylated, dipropylene glycol methyl ether, lauryl dimethylamine oxide, water).

- Unknown-sized tank of Structure builder/water conditioning agent (L-Glutamic acid, N, N-diacetic acid, tetrasodium salt, sodium metasilicate, sodium carbonate, water).
- Unknown-sized tank of Express industrial alkali (sodium hydroxide, water).

- Daily-use chemical storage area – This chemical storage area is located within a bermed area inside a room, which is next to the bulk chemical storage area. It contained multiple types of detergents and cleaning chemicals in different size vessels:
  - Two 300-gallon tanks.
  - Four 55-gallon drums.

- Pretreatment area – Flocculant, coagulant, and clay were stored at the pretreatment area:
  - One 500-gallon tank of D-923/D-924 flocculant near the discharge/sample sump.
  - One 500-gallon tank of coagulant stored within the equalization tank containment area.
  - Multiple bags of clay and a mixing tank adjacent to the DAF unit.

Any floor drains?	Yes. See note 7 in the Notes section of this report for additional details.	Any spill control measures?	Yes. Secondary containment structures and a concrete berm.

General housekeeping of chemical storage area (Describe): The chemical storage areas were relatively clean and organized. See note 7 in the Notes section of this report for additional details.

12. Are hazardous wastes drummed and labeled? N/R.

13. Does the IU have hazardous waste manifests? This component was not reviewed as part of the site inspection.

Any problems associated with hazardous waste: This component was not reviewed as part of the site inspection.

14. Solid waste production: Solid waste was produced at the facility in the form of filter cake; solids from the dirty-water pits and clean dirty-water pit; screen shaker lint and debris; and sludge from the equalization tank and DAF unit.

Solid waste disposal method(s): Solid wastes at the facility were collected and hauled offsite for proper disposal at the Apex landfill.

15. Description of sample location: The facility's sample location was inside the discharge/sample sump located in the northeast portion of the facility, adjacent to the DAF unit, flocculent tank, and unlabeled tank.

Sampling method/technique: Grab and composite samples were collected at the facility.

16.	Evaluation of self-monitoring data?		Yes	X	No		N/A

If yes, was self-monitoring adequate: N/R.

17. Who performs the self-monitoring analysis? The Production Manager stated that Silver State Laboratories is responsible for the self-monitoring sample collection and analysis. In addition, he stated that Silver State Laboratories shows up unannounced to the facility to collect the samples.

Notes:

1. The City inspector stated that while he is responsible for conducting compliance sampling at the City's Class I facilities (i.e., SIUs), he had not previously conducted an inspection at a Class I facility. The City's previous pretreatment program supervisor had inspected the Class I facilities.

2. The EPA Inspection Team observed that the facility was discharging wastewater to the City under an expired Class I Wastewater Control Permit at the time of the inspection. The Production Manager

provided a copy of the facility's Class I Wastewater Control Permit to the EPA Inspection Team at the beginning of the inspection. The permit became effective on September 1, 2009 and expired on August 31, 2014. The Production Manager stated that in the summer of 2014, he had contacted the City regarding the upcoming permit expiration date and that the City's previous pretreatment coordinator verbally told him to continue operating after the expiration date of the permit. In addition, he stated that he did not receive a written confirmation from the City to continue operating under the expired permit after August 31, 2014. The federal regulations at 40 CFR 403.8(f)(1)(iii) state that a publicly owned treatment works (POTW) pretreatment program must "control through Permit, order, or similar means, the contribution to the POTW by each Industrial User to ensure compliance with applicable Pretreatment Standards and Requirements. In the case of Industrial Users identified as significant under § 403.3(v), this control shall be achieved through individual permits or equivalent individual control mechanisms issued to each such User." The City is required ensure that the facility is issued a valid permit in order to control the contribution to the POTW by the industrial user in accordance with the federal regulations at 40 CFR 403.8(f)(1)(iii).

3. The facility was planning to modify the pretreatment system in December 2014. Specifically, the facility was planning to install a hard-pipe connection from the 10,000-gallon clean dirty-water pit to the approximate 30,000-gallon equalization tank. At the time of the inspection, the clean dirty-water pit and equalization tank were connected via a flexible pipe that hung between the pit and the tank.

4. The Production Manager stated that the facility does not conduct continuous pH monitoring of the facility's discharge. The EPA Inspection Team observed a pH probe and a monitoring system control box; however, the system was inoperable at the time of the inspection. In addition, a tank with an unknown purpose was observed between the DAF unit and the facility's discharge/sample sump. The facility representatives were unaware of the purpose of the tank. Effluent from the DAF passed through the tank before entering the discharge/sample sump (refer to Photograph 1 in the CINTAS Corporation Photograph log).

5. The EPA Inspection Team observed a large amount of foam at two locations: the effluent point from the DAF unit and within the discharge/sample sump (refer to Photographs 2 and 3 in the CINTAS Corporation Photograph log). The facility's pretreatment operator present at the time of the inspection stated that foam is very common in both the DAF unit and within the discharge/sample sump due to the flocculent that is added to the wastewater upstream of the DAF unit. The facility does not conduct continuous pH monitoring; therefore, the EPA Inspection Team was unable to verify whether the foam accumulated was influencing the pH of the facility's discharge. It is recommended that the City conduct a followup inspection to determine the facility's need to reinstall the pH monitoring system to conduct continuous pH monitoring and ultimately ensure that the wastewater is within the permitted pH range. Soaps and detergents can raise the pH of the wastewater; therefore, the City should ensure that the pH of the facility's discharge is within the permitted limits.

6. The Production Manager stated that a CINTAS-employee pretreatment-system operator was present at the facility during each shift, but that the facility relies on a third party, Decon Water Technologies, LLC, to operate and maintain the pretreatment system. In addition, he stated that Decon Water Technologies, LLC visits the pretreatment system monthly to maintain the system and discuss operations with the CINTAS pretreatment-system operators. Furthermore, he stated that Decon Water Technologies, LLC was responsible for providing the facility with coagulant, flocculent, and clay. It is recommended that the City inspectors become familiar with the facility's pretreatment system and that the City

recommend the facility develop written standard operating procedures (SOPs) for operating the pretreatment system in the event that Decon Water Technologies, LLC is unavailable.

7. The EPA Inspection Team observed that the 500-gallon tank of flocculent was stored immediately up gradient of the facility's discharge/sample sump. The flocculent tank was single-walled and was not located in a secondary containment structure (refer to Photographs 4 and 5 in the CINTAS Corporation Photograph log). In the event of a spill or leak, flocculent could potentially enter the discharge/sample sump and discharge directly to the City via the open discharge pipe. Part II, Monitoring and Reporting, Item L, Spill Containment Systems, of the facility's expired Class I Wastewater Control Permit states, "Secondary containment is required for all petroleum and chemical products in containers greater than five gallons." Therefore, the City is required to ensure that the facility store the 500-gallon tank of flocculent inside secondary containment in accordance with Part II, Item L of the permit. It is also recommended that the City conduct a follow-up inspection to ensure that chemicals are properly stored, and not within the direct vicinity of the facility's discharge/sample sump.

   In addition, the 500-gallon tank of coagulant was stored inside the equalization tank containment area. It could not be determined while the EPA Inspection Team was onsite if the coagulant tank was double-walled. The EPA Inspection Team observed three floor drains at the bottom of the containment area; these drained back to the 10,000-gallon, clean dirty-water pit. The Production Manager stated that in the event of a spill or leak from the coagulant tank, the coagulant would be isolated in the clean dirty-water pit. The federal regulations at 40 CFR 403.8(f)(2)(vi) state that the POTW shall "evaluate whether each Significant Industrial User needs a plan or other action to control Slug Discharges." The EPA Inspection Team was unable to confirm if the facility had been evaluated for the need to develop a slug discharge control plan (SDCP). Due to the uncontained flocculent tank near the discharge/sample sump and the potentially uncontained coagulant tank inside the equalization tank containment area, the City is required to evaluate the need for the facility to develop a SDCP in accordance with the federal regulations at 40 CFR 403.8(f)(2)(vi).

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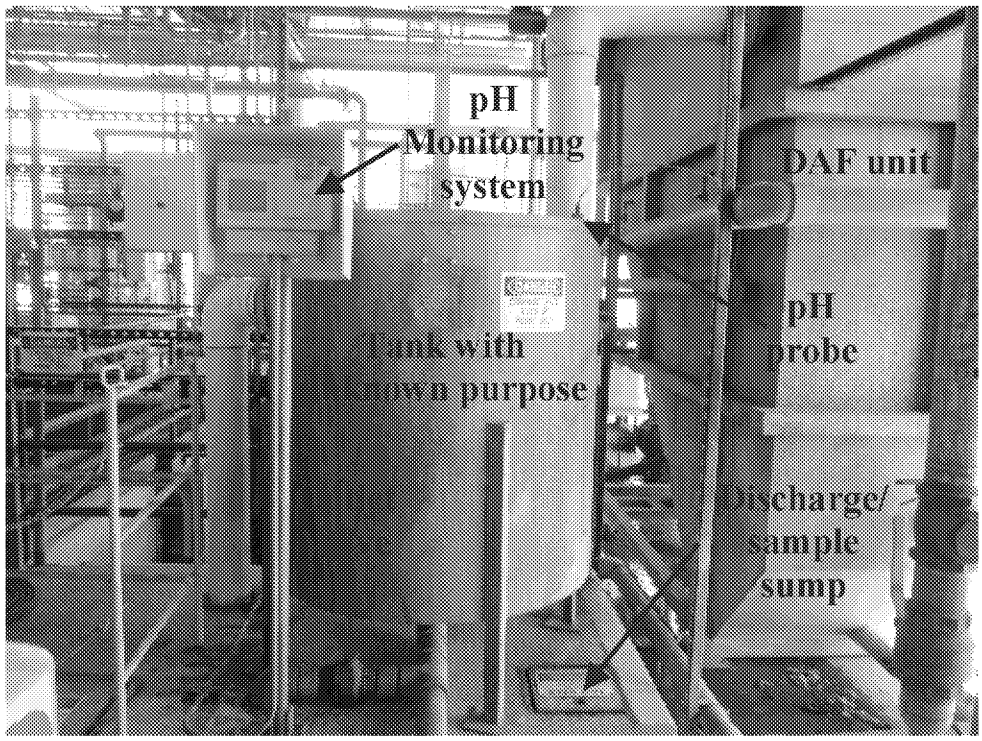
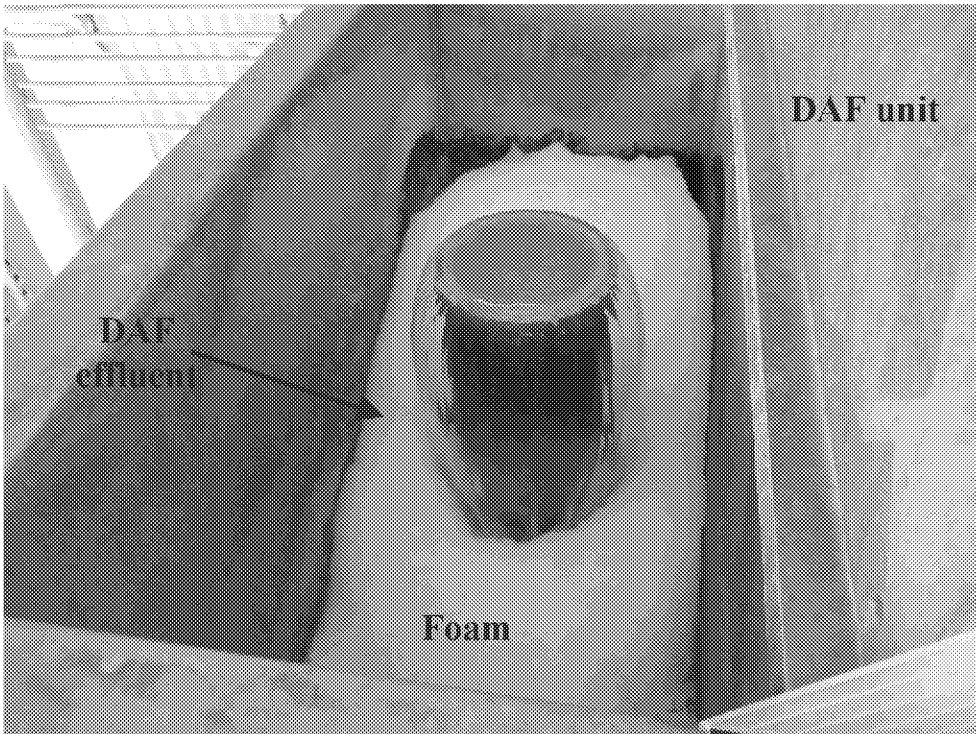
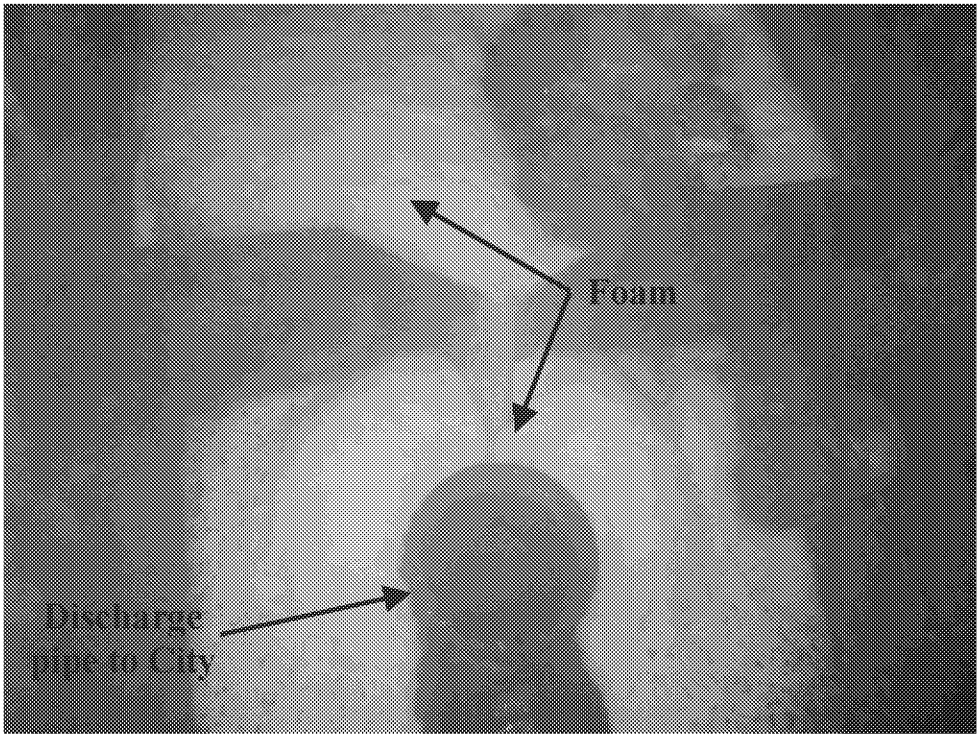


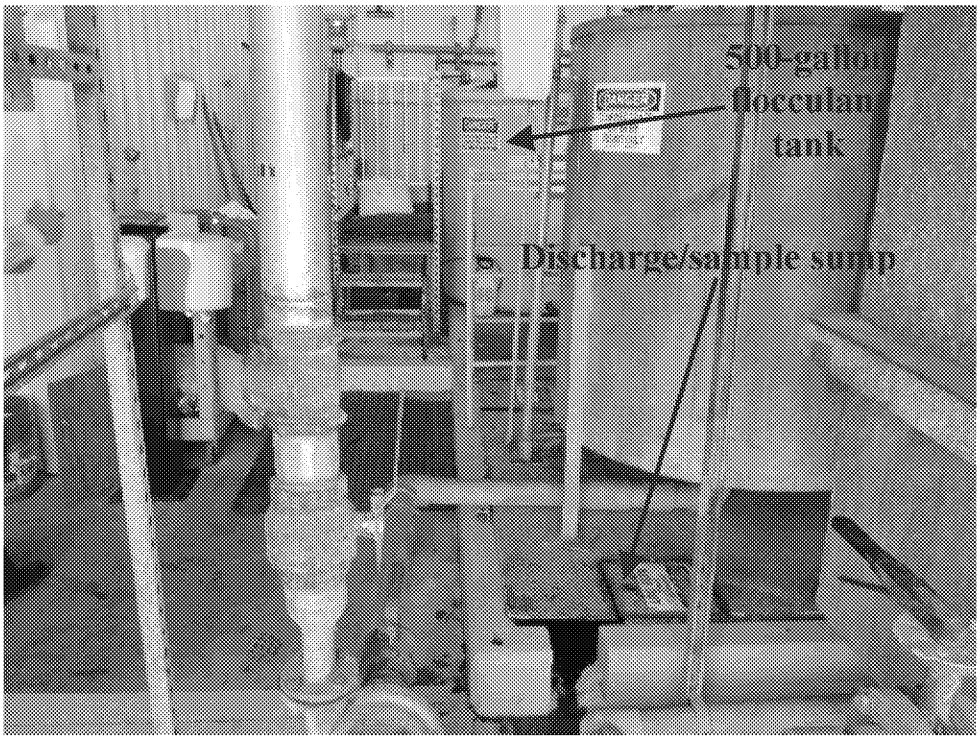
Photograph 1. View of the unlabeled tank, pH monitoring system, and pH probe located adjacent to the DAF unit and discharge/sample sump. The pH monitoring system was inoperable at the time of the inspection. Note the unknown tank's outlet pipe valve.



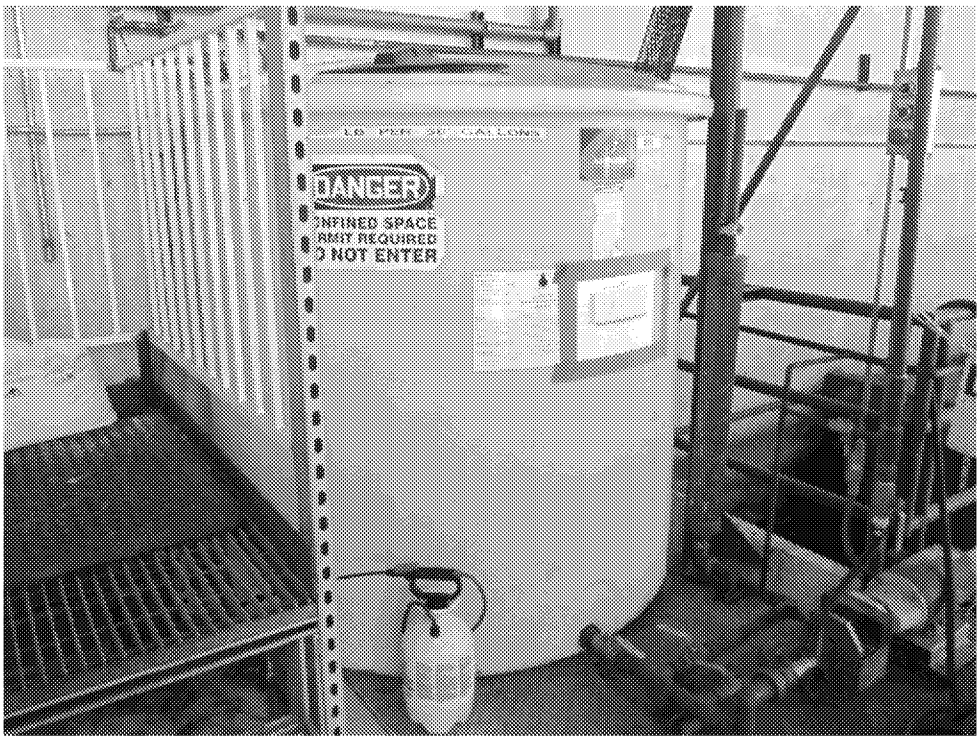
Photograph 2. View of foam accumulation at the DAF unit effluent discharge point. The facility's pretreatment system shift operator stated that foam was very common in here and in the discharge/sample sump due to the addition of flocculant to the wastewater, prior to the DAF unit.



Photograph 3. View of foam accumulation inside the facility's discharge/sample sump.



Photograph 4. View of the single-walled, 500-gallon flocculant tank stored immediately adjacent to the facility's discharge/sample sump. Note the tank was not in secondary containment.



Photograph 5. Close-up view of the single-walled, 500-gallon flocculant tank, shown in Photograph 4, stored immediately adjacent to the facility's discharge/sample sump. Note the tank was not in secondary containment.

G&K Services

Site Visit Data Sheet

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.						
Name of Industry: G&K Services						
Address of Industry: 4670 Vandenberg Drive; North Las Vegas, NV 89081						
Date of visit: 9/29/2014			Time of visit: 3:20 p.m.			
Name of inspector(s): Perry Johnson, Water Reclamation Facility Operations Supervisor, City of North Las Vegas (City) Kirk Medina, Utilities Operations Manager, City Nikita Lingenfelter, NDEP, Technical, Compliance and Enforcement, Bureau of Water Pollution Control Jim Polek, EPA Region 9 Danny O'Connell, EPA Contractor, PG Environmental, LLC						
Provide the name(s) and title(s) of industry representative(s)						
Name			**Title**		**Phone/Email**	
See notes 1 and 2 in Notes section.			Plant Manager		888-349-2754	
			Operations Manager			
IU Permit Number: NIP-9			Exp Date: See note 3 in Notes section for additional information.		IU Classification: See note 3 in Notes.	
Inspection Type/Purpose		Scheduled	X	Unscheduled		PCA
	X	PCI		New Company		Complaint
Please provide the following documentation:						
1. Nature of operation: The facility was an industrial laundry that laundered rugs, rags/wipers, and uniforms from various clients. The inspection process at the facility was unique and the EPA Inspection Team adapted as needed to conduct the facility inspection. Refer to notes 1 and 2 of the Notes section for additional details.						
2. Number of employees	120		Number of shifts:	2	Hours of operation:	15 hours per day; Monday–Friday.
3. Water source: City of North Las Vegas						
4. Wastestream flow(s) discharged to the POTW: The facility was applying an advanced wash water treatment system to their operations in an effort to reuse all wash waters. When the system does not have the storage capacity or the treatment system doesn't generate a reusable water quality, the facility discharges pretreated wash water from its laundry operations and general facility cleanup water.						
Sanitary:	Not reviewed (N/R).		Process:	N/R. See note 3 in the Notes section.	Combined:	N/R.
5. Describe any significant changes in process or flow: No significant changes in process or flow were observed or reported at the facility during the inspection. The facility representative stated that the software associated with the mechanical oil recovery system was in the process of being upgraded.						
6. Type of pretreatment system (Describe): As previously mentioned, the facility had a water reuse system which allowed water at the facility to constantly be recycled throughout the laundering process. Excess wastewater or wastewater that does not meet specific parameters is treated before being discharged to the sanitary sewer. The wastewater is collected in an overflow tank where the pH of the wastewater is measured and adjusted using sulfuric acid (93%) and an automatic dosing system. The pH of the wastewater is again measured before being discharged to the sanitary sewer. The pH of the effluent at the time of the inspection was 10.42 standard units (s.u.) (refer to Photograph 1 in the attached Photograph						

	Log). Two 55-gallon drums of sulfuric acid within secondary containment were observed during the facility inspection.				
X	Continuous flow		Batch		Combined
7.	Condition/operation of pretreatment system (Describe): The facility's pretreatment system appeared to be operating properly at the time of the inspection.				
	Any unusual conditions or problems with the pretreatment system: The EPA Inspection Team observed a pipe and valve on the bottom of the 'Norchem Oil Storage Tank' which was stored in the immediate vicinity of a floor drain. Refer to note 4 in the Notes section for additional details.				
8.	Process area description (identify raw materials and processes used): The laundry processing area and receiving and shipping areas were not reviewed or evaluated as a component of this inspection; however, the facility's water reuse and treatment system was reviewed during the inspection. The facility's water reuse and treatment system consisted of a mechanical oil water separator, two centrifuge-type shakers, and four ceramic filters (refer to Photograph 2 of the attached Photograph Log). The treated wastewaters are held in storage tanks for reuse after treatment (refer to Photograph 3 of the attached Photograph Log).The four high pressure filters were the main components of the facility's treatment and reuse system. The filters were ceramic and treated wastewater to the sub-micron level. The other key component of the system was the mechanical oil water separator unit, which was installed approximately 90 days prior to the facility inspection. The software for the separator unit was in the process of being upgraded to enhance performance efficiencies at the time of the inspection. Oils recovered from the separator unit were collected and stored in the 'Norchem Oil Storage Tank' with the capacity of approximately 2,000 gallons. The tank was pumped by an offsite hauler approximately every 11 days. The facility representative expressed that water was discharged to the sanitary sewer if storage capacity is not available or if the treatment quality is below reuse specifications. The facility also had a SCADA system for the operation of its water treatment and reuse system (refer to Photograph 4 of the attached G&K Services Photograph Log).				
9.	Condition/operation of process area (Describe): N/R.				
	Any unusual conditions or problems with the process area: N/R.				
10.	General housekeeping in process area (Describe): The process area was relatively clean and organized based on the EPA Inspection Team's walk-through to the facility's pretreatment area.				
	Any unusual conditions or problems with general housekeeping in process area: No unusual conditions or problems were observed with the housekeeping of the process area during the time of the inspection.				
11.	Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): The chemical storage areas were not reviewed or evaluated as a component of this inspection.				
	Any floor drains?	N/R.	Any spill control measures?	N/R.	
	General housekeeping of chemical storage area (Describe): N/R.				
12.	Are hazardous wastes drummed and labeled? This component was not reviewed as part of the site inspection.				
13.	Does the IU have hazardous waste manifests? N/R.				
	Any problems associated with hazardous waste: N/R.				
14.	Solid waste production: This component was not reviewed as part of the site inspection.				
	Solid waste disposal method(s): N/R.				
15.	Description of sample location: The facility's sample location was outside the building located in a				

	utility hole. The wastewater discharging from the facility at the time of the inspection had a light brown hue (refer to Photograph 5 of the attached G&K Services Photograph Log).					
	Sampling method/technique: Grab and composite samples were collected at the facility.					
16.	Evaluation of self-monitoring data?		Yes	X	No	N/A
	If yes, was self-monitoring adequate: N/R.					
17.	Who performs the self-monitoring analysis? This component was not reviewed as part of the site inspection.					

Notes:

1. The City inspector had been to the facility before, but was not the typical inspector of the facility.

2. This inspection was unannounced and the EPA Inspection Team had not previously planned to inspect the facility at the beginning of the site visit component of the inspection. However, the previous site inspection conducted earlier that day took longer than expected. The EPA Inspection Team chose to inspect this facility based on its proximity to the previous facility's location and to ultimately maximize the EPA Inspection Team's time in the field. Due to the aforementioned time constraints, the EPA Inspection Team planned to conduct a quick inspection at the facility that mainly focused on the water treatment and reuse system at the facility (thought to take approximately 20-30 minutes). The EPA Inspection Team was delayed in a conference room for approximately 10 minutes prior to starting the inspection process. Due to the available time this activity was more of a tour than a brief inspection. The facility representatives were overwhelmed by the EPA Inspection Team's request to conduct an inspection with a team of representatives from the City, EPA, State, and a federal contractor. The facility's concerns were exacerbated by the fact the City had recently been to the facility to hold pretreatment-related discussions.

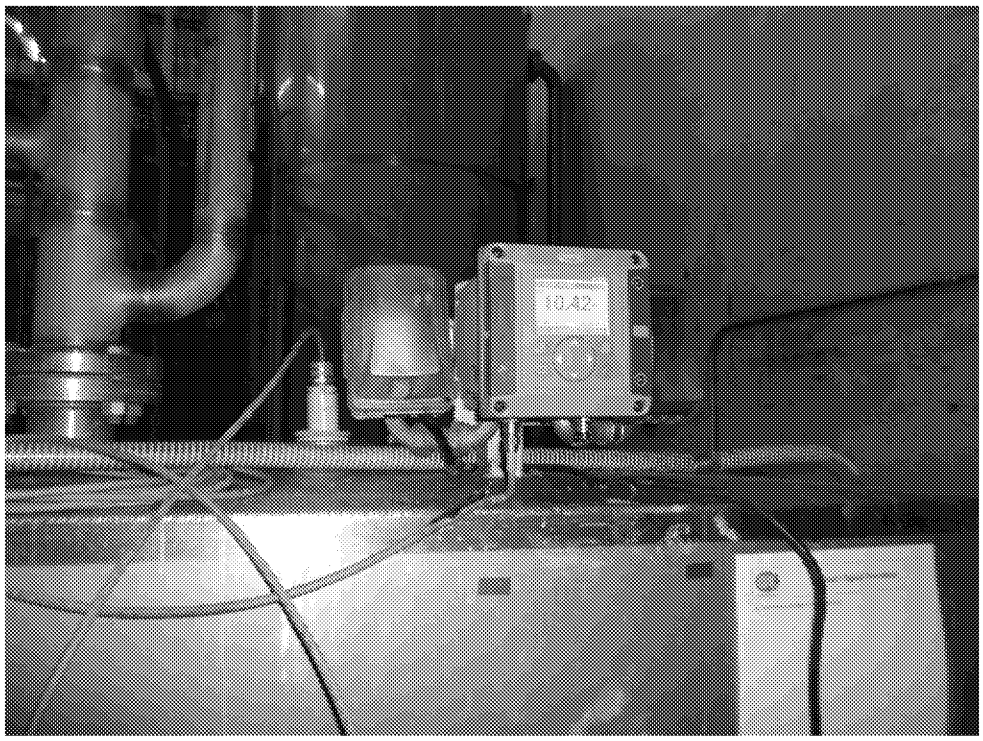
   Based on the apprehension of the facility representatives and time constraints, the facility representatives were informed that the EPA Inspection Team intended to conduct an inspection of the facility's pretreatment system. The EPA Inspection Team's process for formally documenting names and titles as well as completing the field inspection form was not completed due to aforementioned complications. The facility representative's names and titles were written on a secondary field sheet so that the EPA Inspection Team could proceed with the inspection, while not heightening the representatives concerns that this visit was something other than a brief inspection of their new wastewater treatment system. (Note: The secondary field sheet was lost while in transit. Information, such as representative names and some operational specifics are not available for this report.)

3. The facility's file (including permit application, permit, sampling data, inspection reports, facility correspondence, and enforcement actions) was not reviewed or evaluated as a component of the field inspection or the PCI process.

4. The facility representatives were very proud of their water treatment and reuse system and stated to contact them in the event that additional information or inspections were needed. The EPA Inspection Team recommended that the City conduct a thorough follow-up inspection of the facility. Two observations were noted during the facility tour that requires additional information:
   - Operation of the pH adjustment system:
     - What pH values activate the system's injection of acid?
     - How often is the instrumentation for the system (e.g. pH probes, chemical injection pumps, etc.) calibrated?

- What are the set points for the pH wastewater alarm system?
- Norchem Oil Storage Tank:
  - When is the valve on the bottom of the tank used?
  - What are the operational protocols for the storage tank's use?
  - Does the facility have a slug discharge control plan?

5. The facility had a daily log sheet which was used to record information pertaining to the water treatment and reuse system (refer to Photograph 6 of the attached G&K Services Photograph Log).



Photograph 1. Digital pH monitor for wastewater being discharged to the sanitary sewer. The meter was reading a pH of 10.42 standard units at this time of the inspection.

Photograph 2. View of the high pressure filters supporting the operation of the water treatment and reuse system.

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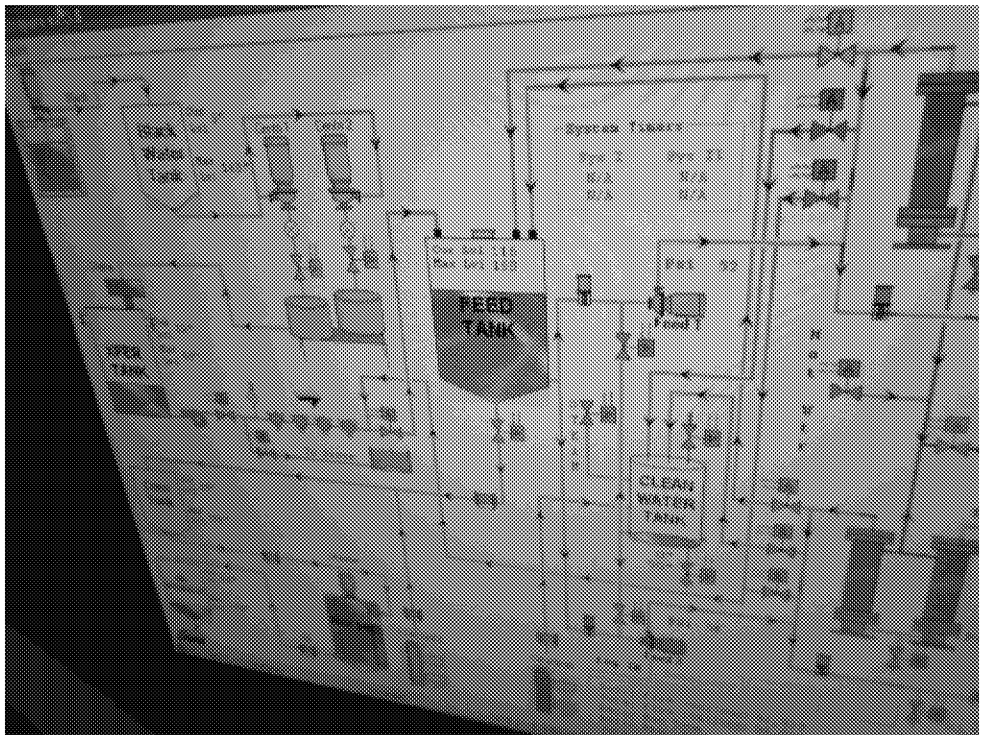
Photograph 3. View of the storage tanks supporting the operation of the water treatment and reuse system.



Photograph 4. View of the SCADA screen for the operation of the water treatment and reuse system.

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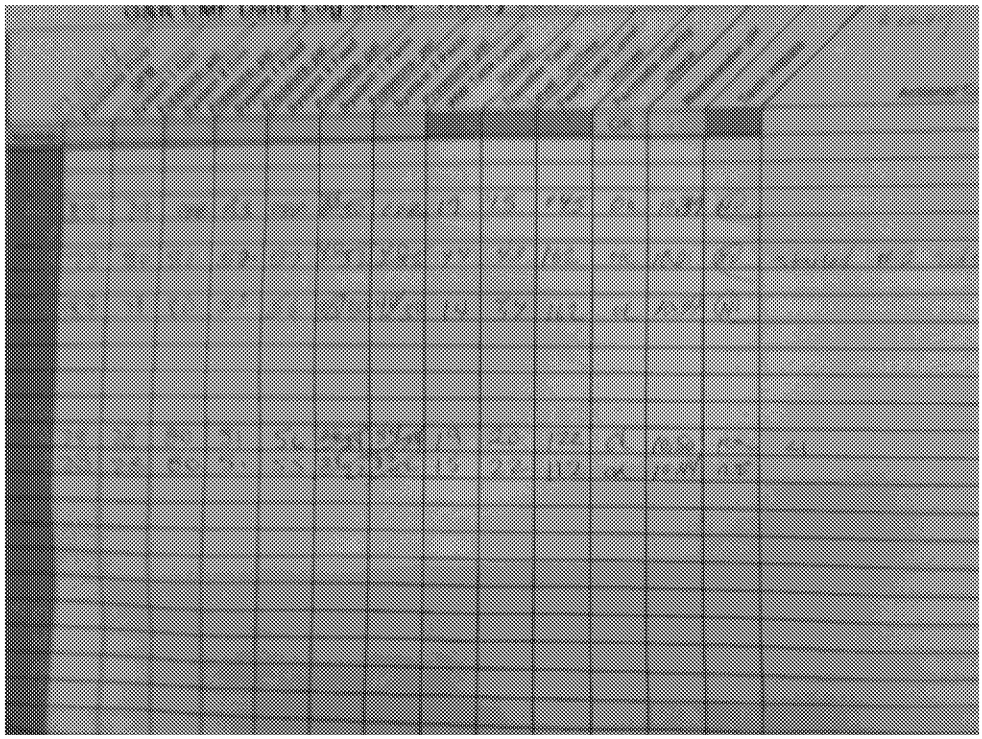
Photograph 5. View of the final discharge and sampling location at the facility's outfall. The discharge had a light brown hue in comparison to the white foam.



Photograph 6. View of wastewater treatment and reuse system's daily log sheet.

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Pipe Maintenance Services, Inc.

Site Visit Data Sheet

ED_002461_00010486-00070

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.						
Name of Industry: Pipe Maintenance Services Inc.						
Address of Industry: 4505 Andrews St.; North Las Vegas, NV 89081						
Date of visit: 9/29/2014			Time of visit: 1:35 p.m.			
Name of inspector(s): Perry Johnson, Water Reclamation Facility Operations Supervisor, City of North Las Vegas (City) Kirk Medina, Utilities Operations Manager, City Nikita Lingenfelter, Nevada Division of Environmental Protection Jim Polek, EPA Region 9 Danny O'Connell, EPA Contractor, PG Environmental, LLC						
Provide the name(s) and title(s) of industry representative(s)						
Name			**Title**		**Phone/Email**	
Chad McGraw			Operations Manager		702-656-0168	
IU Permit Number: NIP-8 (Class I Permit)			Exp Date: November 20, 2010		IU Classification: Non-categorical significant industrial user (SIU).	
Inspection Type/Purpose		Scheduled	X	Unscheduled		PCA
	X	PCI		New Company		Complaint
Please provide the following documentation:						
1. Nature of operation: The facility cleaned grease traps and interceptors by pumping accumulated debris from the interceptors to trailer trucks. The facility stored the contents from the oil and grease interceptors onsite. The facility specialized in cleaning large interceptor structures used by large casinos within the area. See note 1 in the Notes section for additional details on the inspection.						
2. Number of employees	19, see note 2 in the Notes section for additional details.		Number of shifts:	3	Hours of operation:	24 hours per day, services scheduled to meet client's specific needs. See note 3 in the Notes section.
3. Water source: City of North Las Vegas						
4. Wastestream flow(s) discharged to the POTW: The facility discharged pretreated process water and wash water from its brown and yellow grease processing operations to the City's sewer system.						
Sanitary:	Not reviewed (N/R).		Process:	See note 4 in the Notes section for additional information.	Combined:	N/R.
5. Describe any significant changes in process or flow: At the time of the inspection, the facility had implemented a number of significant changes to its grease processing operations, which included the removal of the facility's previous dissolved air floatation (DAF) unit and replacement with the ALAR filter. The EPA Inspection Team requested a schematic diagram of the facility while onsite. A number of significant discrepancies were identified between the process areas depicted on the schematic diagram and the processes observed during the inspection. See note 5 in the Notes section of this report for additional details.						

6. Type of pretreatment system (Describe): Many of the facility's primary process units are similar to treatment technologies typically used when treating oil and grease related wastewater (i.e., DAF unit, treatment focused on oil and water separation). The facility's pretreatment system consists of an ALAR filter unit and a grease interceptor. The ALAR filter used Dicalite-Diatomite (a diatomaceous earth mixture) and a drum filter to remove oil and grease from the wastewater. The wastewater is then sent to a grease trap prior to discharging to the City's sanitary sewer.

Continuous flow		Batch	X	Combined

7. Condition/operation of pretreatment system (Describe): The facility's ALAR filter system appeared to be operating properly at the time of the inspection. The EPA Inspection Team observed that the system was generating relatively dry solid waste (refer to Photograph 1 of the attached Pipe Maintenance Services, Inc. Photograph Log).

   The facility's grease interceptor appeared to be approximately half full. The wastewater level in the interceptor was approximately two feet below the system's high water mark. The EPA Inspection Team observed holes in the wall of the grease trap (refer to Photographs 3 and 4 of the attached Pipe Maintenance Services, Inc. Photograph Log).

Any unusual conditions or problems with the pretreatment system: The EPA Inspection Team observed holes in the walls of the grease trap that would allow the collected grease and possible wastewater to overflow on to the ground. The EPA Inspection Team also identified a black utility hose discharging directly into a trench drain that flowed to the facility's sample location. This water had the potential to dilute the wastewater, thus providing unrepresentative effluent samples for compliance monitoring. See notes 6 and 7 in the Notes section for further detail and Photographs 3 through 11 of the attached Pipe Maintenance Services, Inc. Photograph Log.

8. Process area description (identify raw materials and processes used): The facility's raw materials consisted of used cooking oils in addition to grease interceptor and trap wastes. Wastes collected from servicing client's collection and storage units were processed into raw stock yellow and brown grease for sale to rendering and biodiesel facilities. The wastes were received via pumper truck and processed through a series of heated tanks and a centrifuge, referred to as a "Tricanter" (refer to Photographs 12 and 13 of the attached Pipe Maintenance Services, Inc. Photograph Log). During the inspection, the facility representative provided schematic diagrams to the EPA Inspection Team, refer to Attachments 1.a and 1.b of the Pipe Maintenance Services, Inc. Photograph Log. Attachment 1.a provides a schematic of the brown grease processing sequence and Attachment 1.b provides a schematic of the yellow grease processing sequence (refer to Photograph 14 of the attached Pipe Maintenance Services, Inc. Photograph Log). It should be noted that at the time of the inspection, the EPA Inspection Team modified the schematics to represent the current process operations.

9. Condition/operation of process area (Describe): The brown grease processing area was located outside. The movement and management of grease and general debris associated with grease was a very elaborate process that observed many hoses and pipes (refer to Photographs 12 and 13 of the attached Pipe Maintenance Services, Inc. Photograph Log). The yellow grease (and cooking oils) processing area was housed within the warehouse structure. The yellow grease process was more basic and cleaner than the brown grease processing operation (refer to Photograph 14 of the attached Pipe Maintenance Services, Inc. Photograph Log).

Any unusual conditions or problems with the process area: No unusual conditions or problems were observed with the process area during the time of the inspection.

10. General housekeeping in process area (Describe): The brown grease process area was covered with various degrees of cake grease and general debris. The area had numerous pipes and hoses going in many directions. A lot of the brown grease process area was covered with oil, grease, and general viscous

	liquids that made walking hazardous (refer to Photograph 13 of the attached Pipe Maintenance Services, Inc. Photograph Log). The yellow grease process area was located within the facility warehouse and was clean and organized at the time of the inspection (refer to Photograph 14 Pipe Maintenance Services, Inc. of the attached Photograph Log).
	Any unusual conditions or problems with general housekeeping in process area: Due to the nature of the facility's operations, it was hazardous to walk through some of the process areas due to the accumulation of grease. Apart from this hazard, no unusual conditions or problems were observed with the housekeeping of the process area during the time of the inspection.
11.	Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): The facility's chemical storage area was housed in the boiler room. In the chemical storage area the EPA Inspection team observed a 55-gallon drum and multiple 5-gallon containers of what appeared to be a boiler water treatment chemical, however, at least one of the containers had multiple labels. The drum and the containers were not within secondary containment. See notes 8 and 9in the Notes section for additional information and refer to Photographs 15 and 16 of the attached Pipe Maintenance Services, Inc. Photograph Log.

Any floor drains?	Yes. See notes 8 and 9 in the Notes section of this report for additional details.	Any spill control measures?	No.

	General housekeeping of chemical storage area (Describe): The chemical storage area within the boiler room was relatively clean and organized. The EPA Inspection Team observed an unknown liquid on the floor. See notes 8 and 9 in the Notes section of this report and Photograph 15 of the attached Pipe Maintenance Services, Inc. Photograph Log for additional details.
12.	Are hazardous wastes drummed and labeled? N/R.
13.	Does the IU have hazardous waste manifests? This component was not reviewed as part of the site inspection.
	Any problems associated with hazardous waste: N/R.
14.	Solid waste production: Solid waste was produced at the facility in the form of ALAR filter cake and general solids collected from the oil and grease interceptors and traps.
	Solid waste disposal method(s): Solid wastes were collected and hauled offsite for proper disposal.
15.	Description of sample location: The facility's sample point was located at the sampling well, downstream of the grease trap prior to the discharge entering the City's sewer.
	Sampling method/technique: Grab and composite samples were collected at the facility.

16.	Evaluation of self-monitoring data?		Yes	X	No		N/A

	If yes, was self-monitoring adequate: N/R.
17.	Who performs the self-monitoring analysis? The self-monitoring samples were collected and analyzed by the facility's contract laboratory, Veritas Laboratories.
Notes:	
1.	The City inspector accompanying the EPA Inspection Team was not responsible for inspecting this facility on a regular basis. The City inspector had been to the facility in the past to collect effluent monitoring date in order to confirm compliance with permit limits.
2.	The facility representative stated that maintaining employees can be challenging at times due to the nature of the work and varying hours. The facility typically has eight plant operators, three vacuum truck

operators, and eight tractor trailer drivers.

3. The typical hours of operation for the processing area were from midnight to 10 p.m. Most of the grease interceptor pumping was conducted during night hours.

4. Wastewater flow volume from the facility varies depending upon the quality and volume of wastes received form the grease interceptors and traps that are processed at the facility. It should be noted that a permit application for the facility was not available in facility's pretreatment file. It was unclear to the EPA Inspection Team how the volume and nature of wastewater was evaluated during the permitting process.

5. The EPA Inspection Team observed significant discrepancies between the facility schematic diagrams provided during the inspection and the actual conditions observed at the facility. The following discrepancies were observed:

   - Brown grease process area schematic—The schematic provided to the EPA Inspection Team (refer to Attachment 1.a of this report) showed that the facility used a DAF unit for treatment, although the DAF unit had been replaced with the current ALAR system which was not depicted on the schematic diagram (refer to Photograph 1 of the attached Pipe Maintenance Services, Inc. Photograph Log). The facility also used additional tanks (two-5,000 gallon finished brown oil) located adjacent to the grease separation and storage area, which were not shown on the schematic diagram. The EPA Inspection Team observed that a lime slurry was added to the brown grease process to aid in maintaining a consistent viscosity of the grease during the processing. However, this treatment step was not depicted on the facility schematic diagram provided to the EPA Inspection Team (refer to Photograph 2 of the attached Pipe Maintenance Services, Inc. Photograph Log).

   - Yellow grease process area schematic—The facility schematic diagram shows four-10 micron filters in the yellow grease processing area, however, the EPA Inspection Team observed three-10 micron filters (refer to Attachment 1.b of this report).

   It is strongly recommended that the City follow-up with the facility to ensure that the facility updates the schematic diagrams to accurately reflect the process flow occurring at the facility. The City should also obtain these updated schematic diagrams. It is also recommended that the City and facility representatives discuss the changes to the wastewater treatment process, and stress that the facility representatives notify the City prior to implementing such changes.

6. The EPA Inspection Team observed a number of holes at the high water mark in the grease interceptor tank (refer to Photographs 3 and 4 in the attached Pipe Maintenance Services, Inc. Photograph log). Some of the holes were used to convey pipes leading into the interceptor (refer to Photograph 3in the attached Pipe Maintenance Services, Inc. Photograph Log). However, a hole was observed in the side of the interceptor that did not house a hose or pipe (refer to Photograph 4 in the attached Pipe Maintenance Services, Inc. Photograph Log). It should be noted that the high water mark was located at the hole in the interceptor wall. Due to the condition of the interceptor, it appeared that in the event that the interceptor fills above the high level mark, oil, grease, and debris would spill onto the ground in the process area. Although secondary containment was provided for the area, the cleanup from an interceptor spill may impact the quality of the wastewater discharged to the City. According to Part B.1 of the standard conditions of the facility's permit, "The permittee shall at all times properly operate and maintain all

facilities and systems of treatment and control which are installed or used by the permittee to achieve compliance with conditions of this permit." Due to the lack of standard operating procedures for the grease interceptor tank, the level of the high water mark in relation to the hole, and potential for overflow to spill from the tank, it appeared that the interceptor was not being properly operated. Therefore, the City is required to ensure that the facility properly operates and maintains the process equipment in accordance with Part B.1 of the standard conditions of the facility's permit. The EPA Inspection Team also requested standard operating procedures for the interceptor, which the facility was unable to provide. It is also recommended that the City conduct a follow-up inspection to ensure that appropriate procedures are in place to eliminate spills and/or events that may create slug-like discharges to the sanitary sewer.

7. During the inspection of the boiler room at the facility, a black hose was observed running from a potable water source into the facility's trench drain. It was estimated that the potable water was running at about half of the capacity of the flow rate at the time of the inspection. The EPA Inspection Team traced the destination of the trench drain to a pipe, which mixed with the wastewater from the grease interceptor prior to the sampling location (refer to Photographs 5 through 11 of the attached Pipe Maintenance Services, Inc. Photograph Log). From the observations during the facility inspection, the facility was utilizing the potable water from the black hose to dilute the wastewater prior to discharging to the City's sewer. According to 40 CFR 403.6(d) of the federal regulations, "except where expressly authorized to do so by an applicable Pretreatment Standard or Requirement, no Industrial User shall ever increase the use of process water, or in any other way attempt to dilute a Discharge as a partial or complete substitute for adequate treatment to achieve compliance with a Pretreatment Standard or Requirement." A similar statement prohibiting the use of dilution as treatment is stated in Part A.9 of the standard conditions of the facility's permit. Additionally, Part A.11.b.16 of the standard conditions of the facility's permit states that no water added for the purpose of diluting wastes which would otherwise exceed the applicable maximum concentration limitations shall not be discharged into the City's sewer system. The City is required to ensure that the facility does not increase the use of potable water or in any other way attempt to use dilution as a method of treatment for its process wastewater in accordance with 40 CFR 403.6(d) of the federal regulations and Part A.9 and Part A.11.b.16 of the facility's permit.

8. The chemical storage area in the boiler room is serviced by a floor trench and drain. If there was a chemical spill in this area it had the potential to enter the floor drain and flow by gravity directly to the City's sewer system. Part II, Monitoring and Reporting, Item L, Spill Containment Systems, of the facility's expired Class I Wastewater Control Permit states, "Secondary containment is required for all petroleum and chemical products in containers greater than five gallons." Therefore, the City is required to ensure that the facility store the chemicals in the boiler room inside secondary containment in accordance with Part II, Item L of the permit.

9. The facility's current operating conditions associated with chemical storage could lead to chemical spills directly to the sanitary sewer. The federal regulations at 40 CFR 403.8(f)(2)(vi) state that the POTW shall "evaluate whether each Significant Industrial User needs a plan or other action to control Slug Discharges." The EPA Inspection Team was unable to confirm if the facility had been evaluated for the need to develop a slug discharge control plan (SDCP) due to lack of documentation. Due to the uncontained chemical storage area in the boiler room being stored within the direct vicinity of a sewer connection, the City is required to evaluate the need for the facility to develop a SDCP in accordance with the federal regulations at 40 CFR 403.8(f)(2)(vi).

10. According to the facility representative, it can take up to eight hours to clean a large grease interceptor unit, while a small restaurant grease trap may take as little as 3 minutes to clean. Some of the large interceptors can range from 20,000 to 50,000 gallons. The cleaning operation typically involves the use of a vacuum truck to clean and pump materials to a 5,000 gallon trailer for transport back to the facility for processing. The facility has four vacuum trucks and 19 tractor/trailer units. They also have a video truck, but stated that it's not used for evaluating sewer lines.

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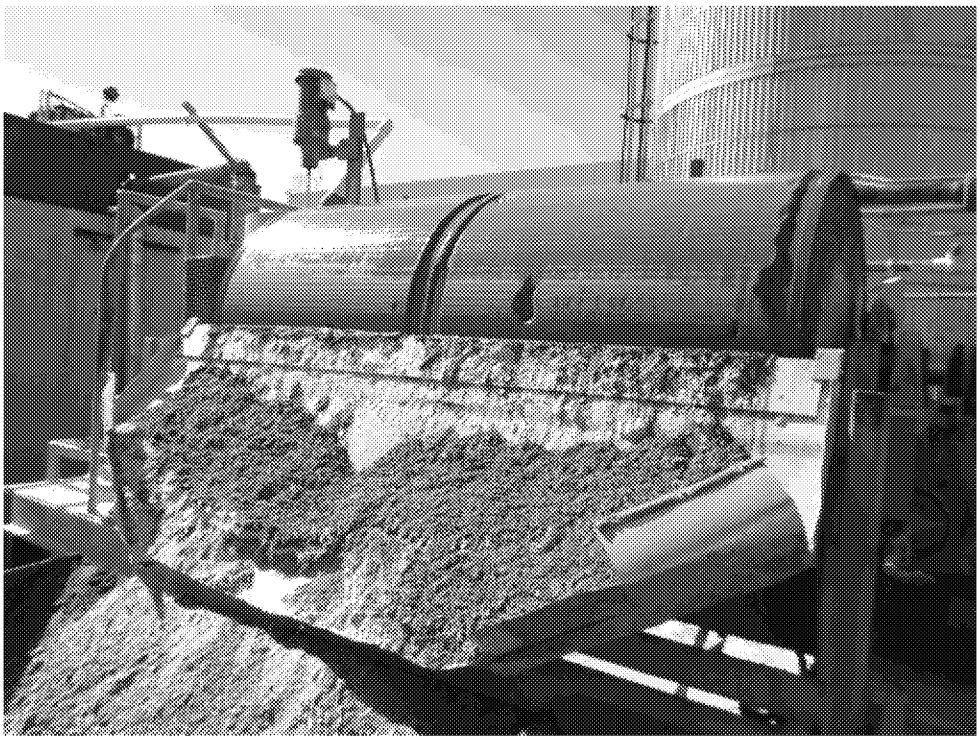
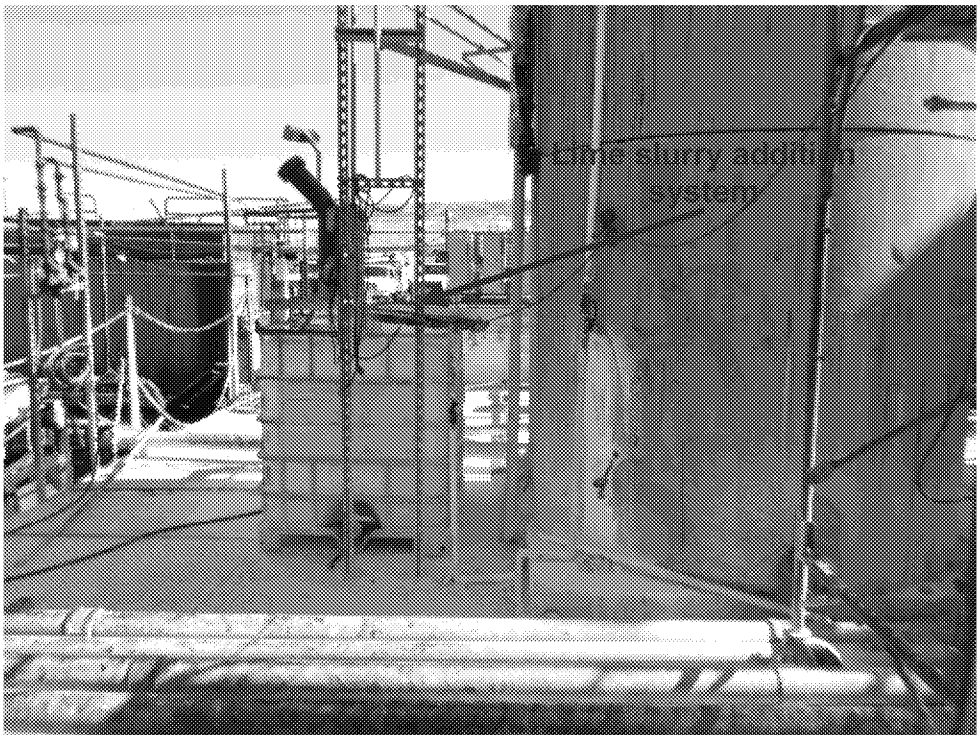
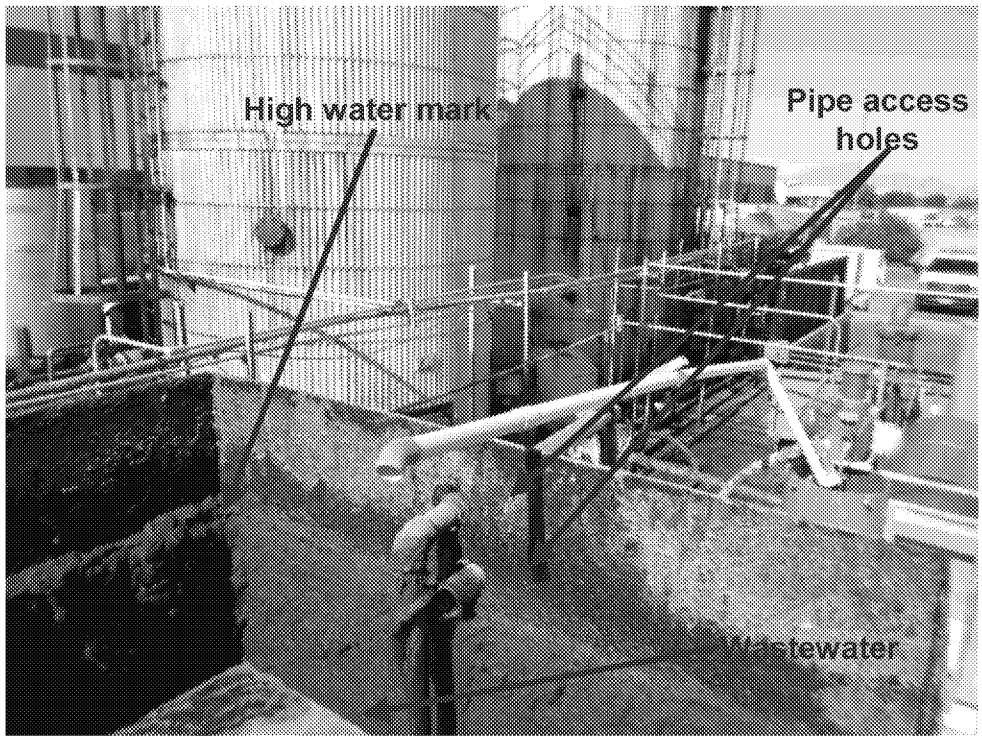


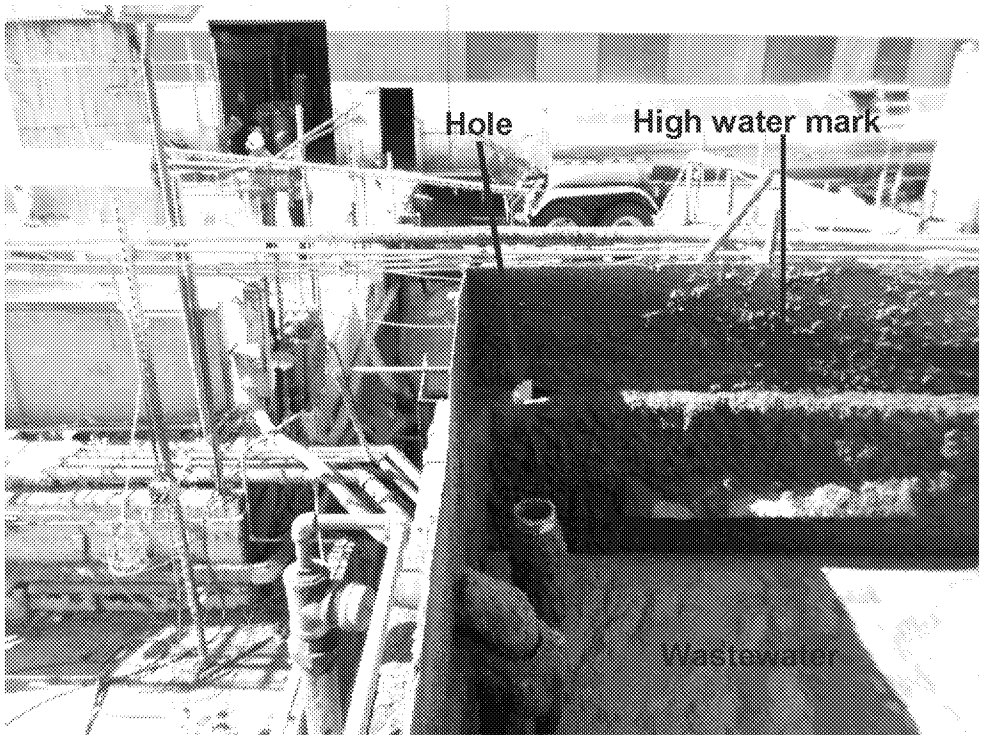
Photograph 1. View of the current ALAR filter unit that has replaced facility's DAF unit. The ALAR filter was not depicted on the schematic of the facility's brown grease processing area.



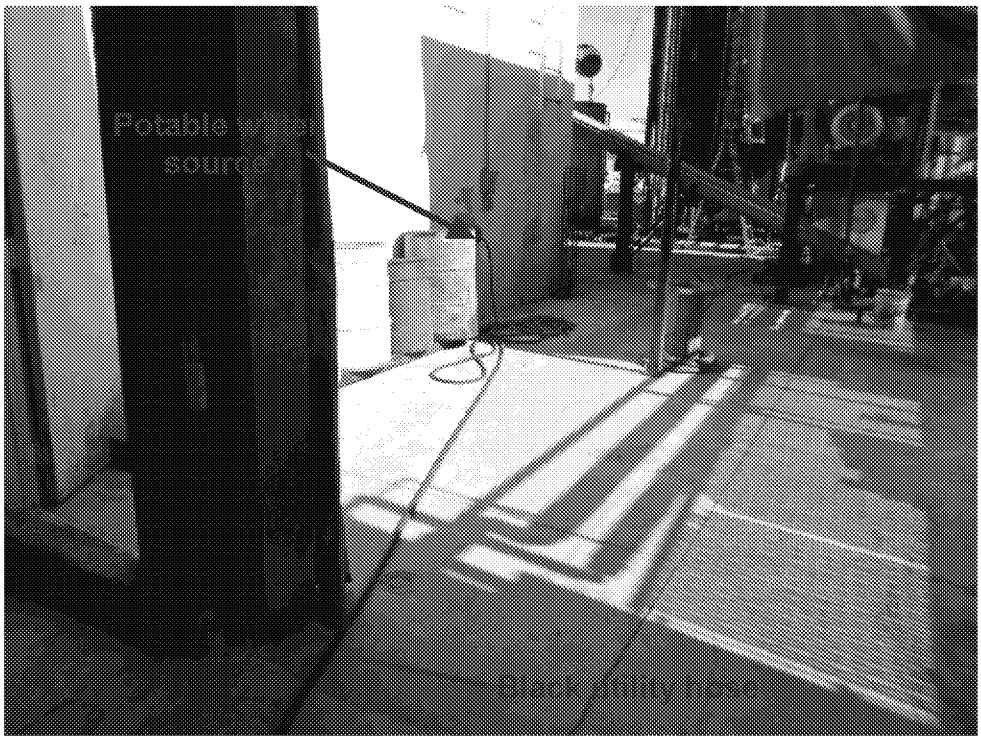
Photograph 2. View of lime slurry addition system, which was not depicted on the schematic diagram of the facility's brown grease processing area.



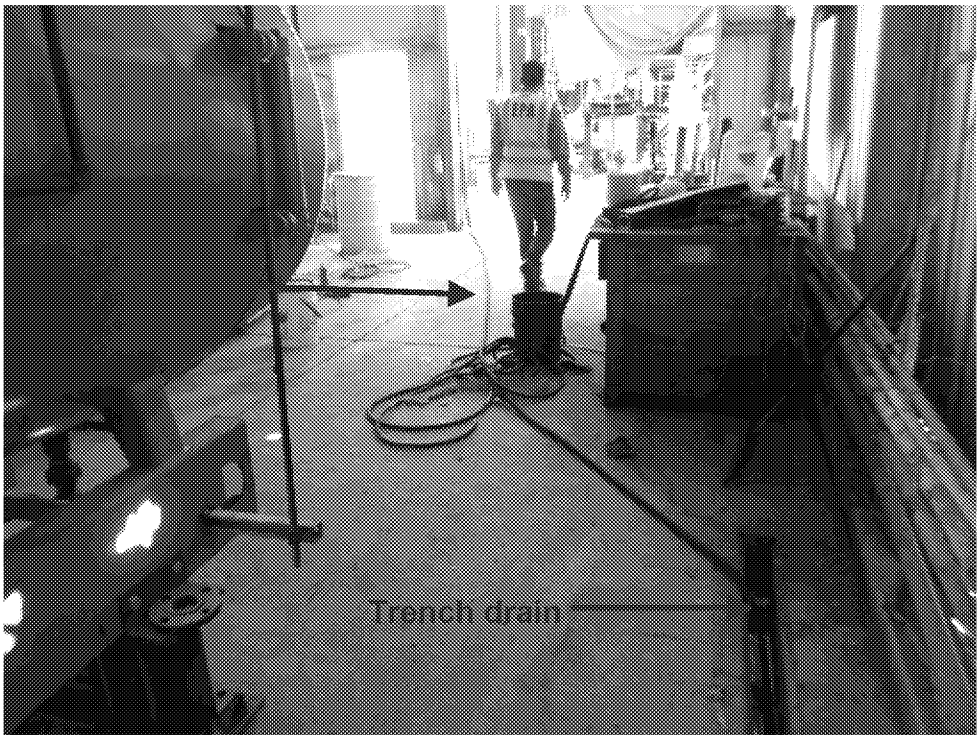
Photograph 3. View of grease interceptor wastewater level, influent pipe from the ALAR unit, and pipe access holes at the high water mark of the grease interceptor.



Photograph 4. View of grease interceptor wastewater level and a hole at the high water mark at the facility's grease interceptor.

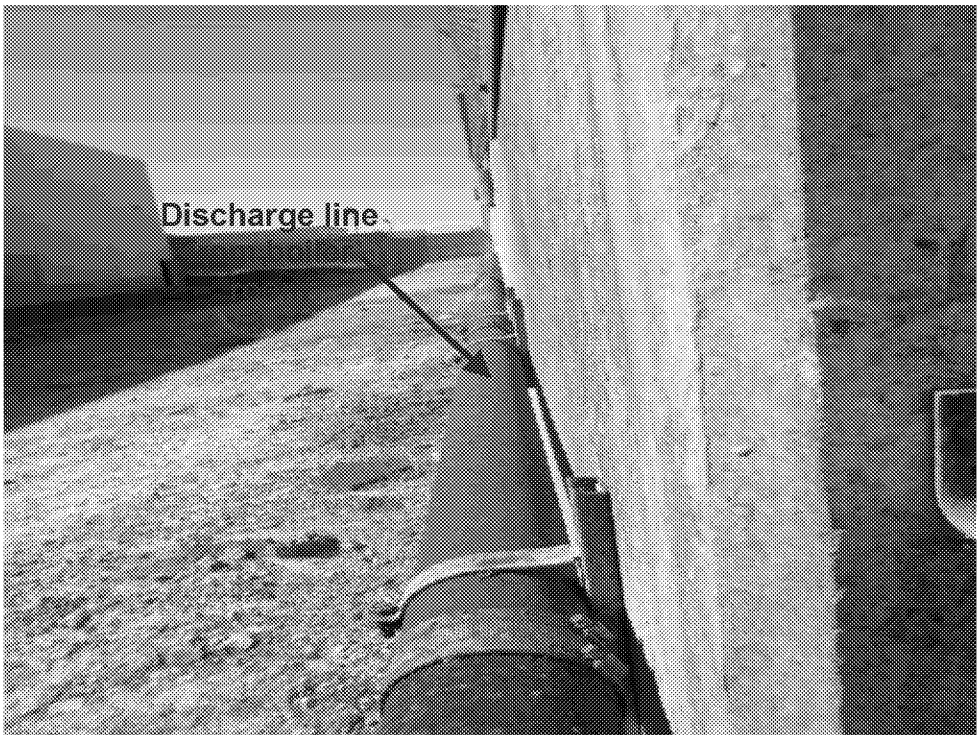


Photograph 5. View of the black utility hose connected to the portable water hose tap, leading into the boiler room.

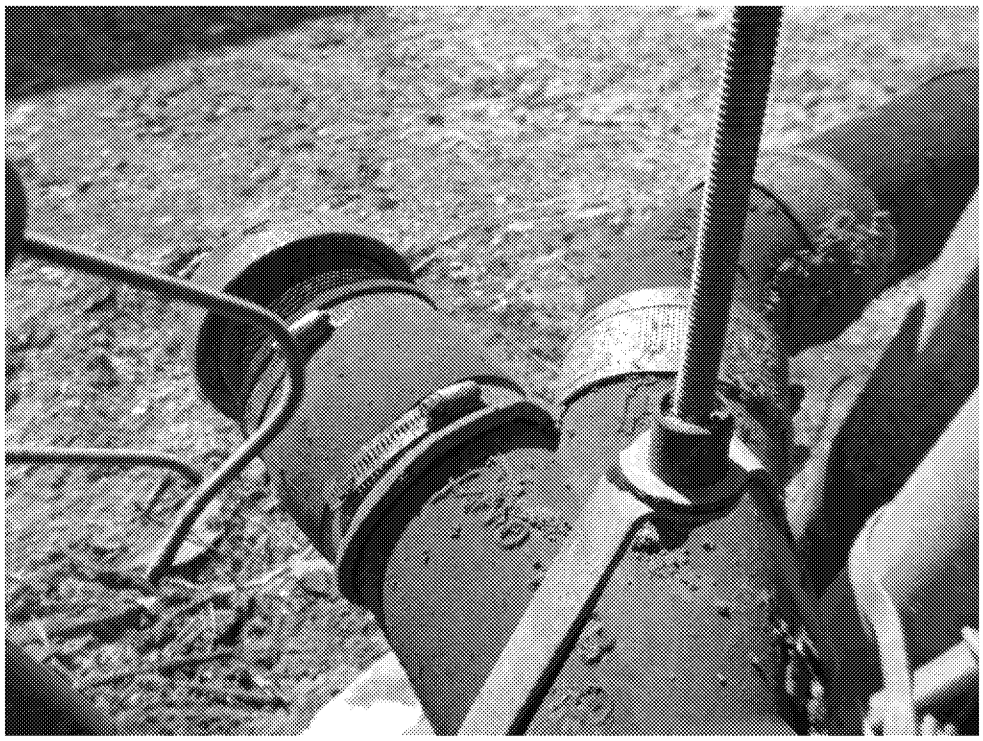


Photograph 6. View of the black utility hose running into the boiler room trench drain.

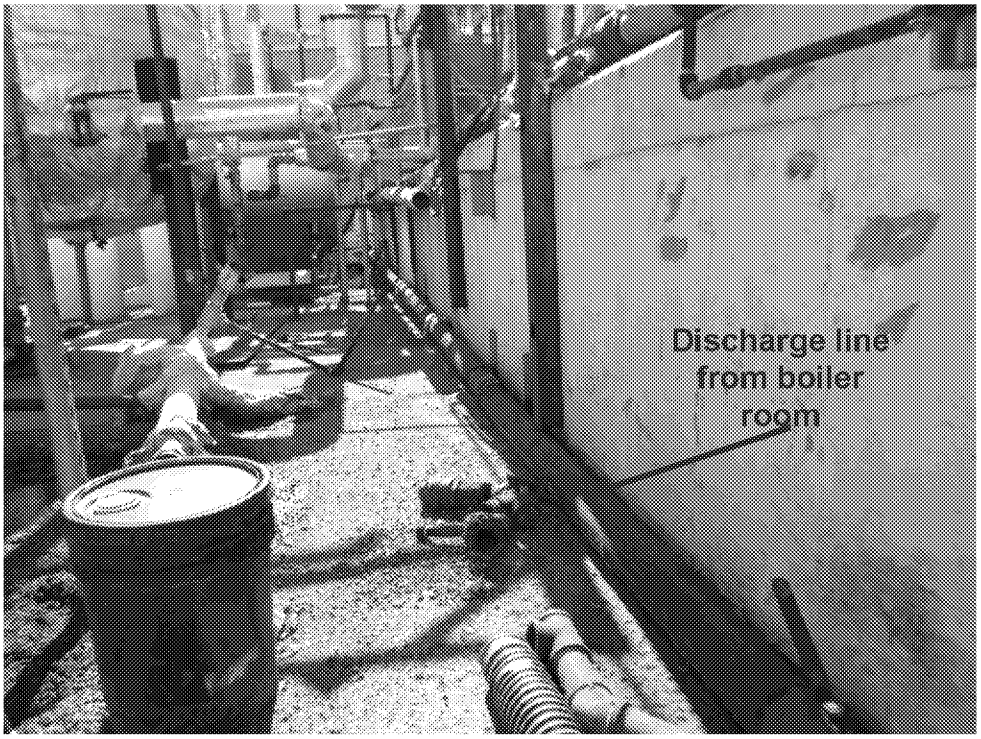
Photograph 7. Close-up view of the boiler room floor trench and drain. A black utility hose was found running in the floor trench, as depicted in Photograph 6, above.



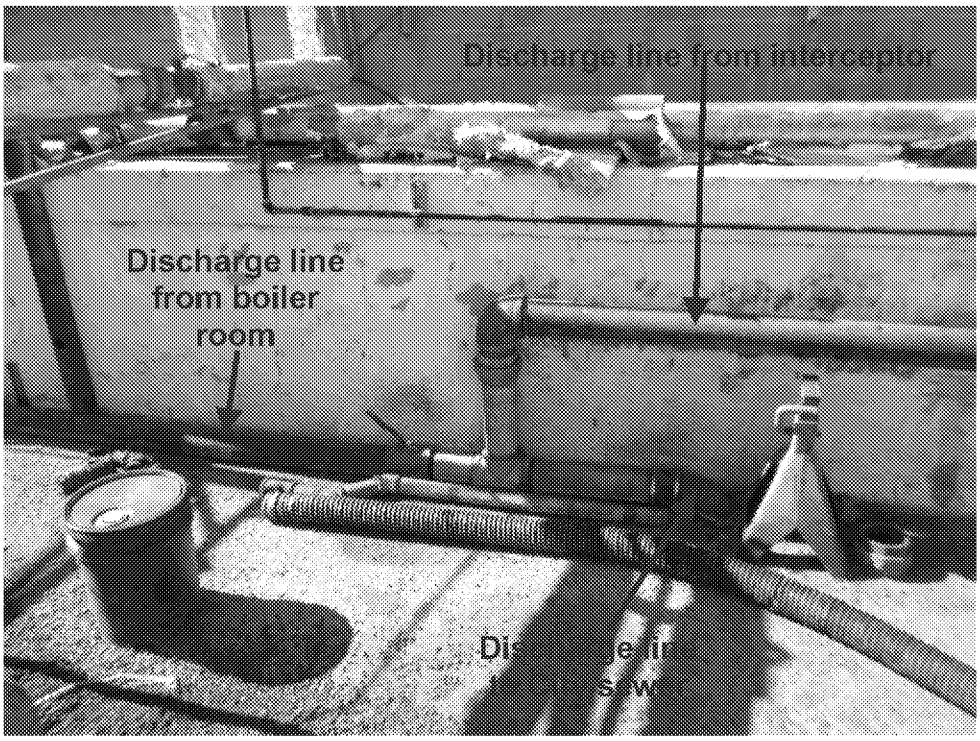
Photograph 8. View of the discharge line following the perimeter of the exterior edge of the property from the facility's boiler room.



Photograph 9. View of the discharge line following the perimeter of the process area at the exterior edge of the property. It unclear why there was a "Y" connector at this location or if this location was used for pumping directly to the sewer.



Photograph 10. View of the discharge line depicted in Photograph 8 following the perimeter of the process area.



Photograph 11. View of the facility's process discharge lines to the City's sewer system.

Photograph 12. View of receiving and shipping area for raw and finished grease. The area housed four heated storage tanks (20,000 gallons each) and various equipment for grease processing operations.

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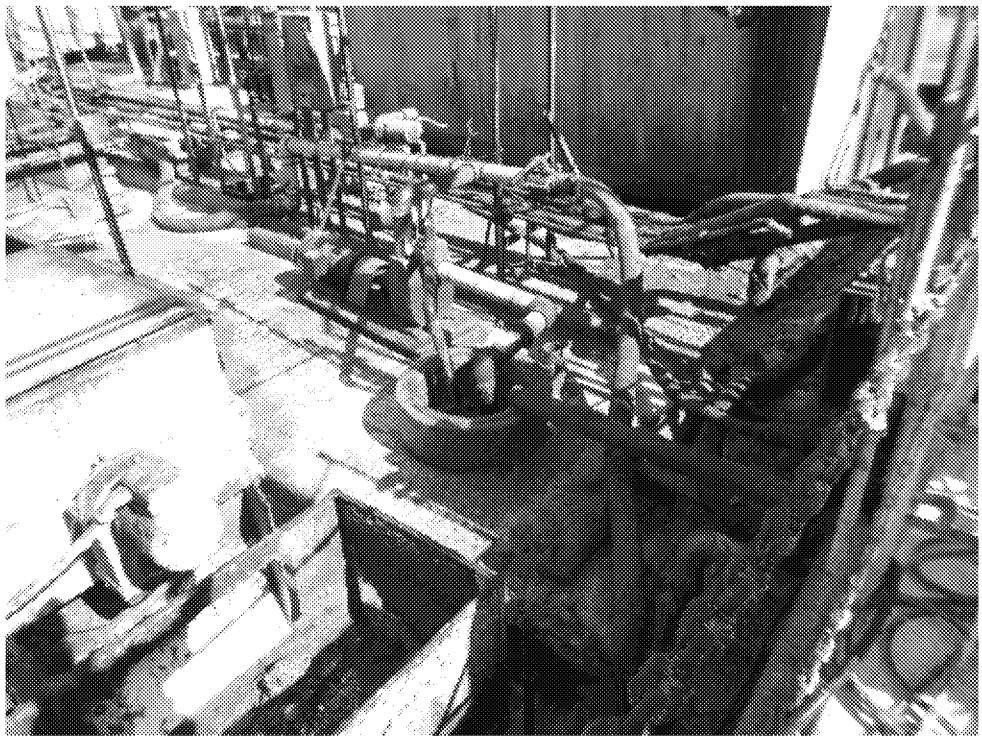
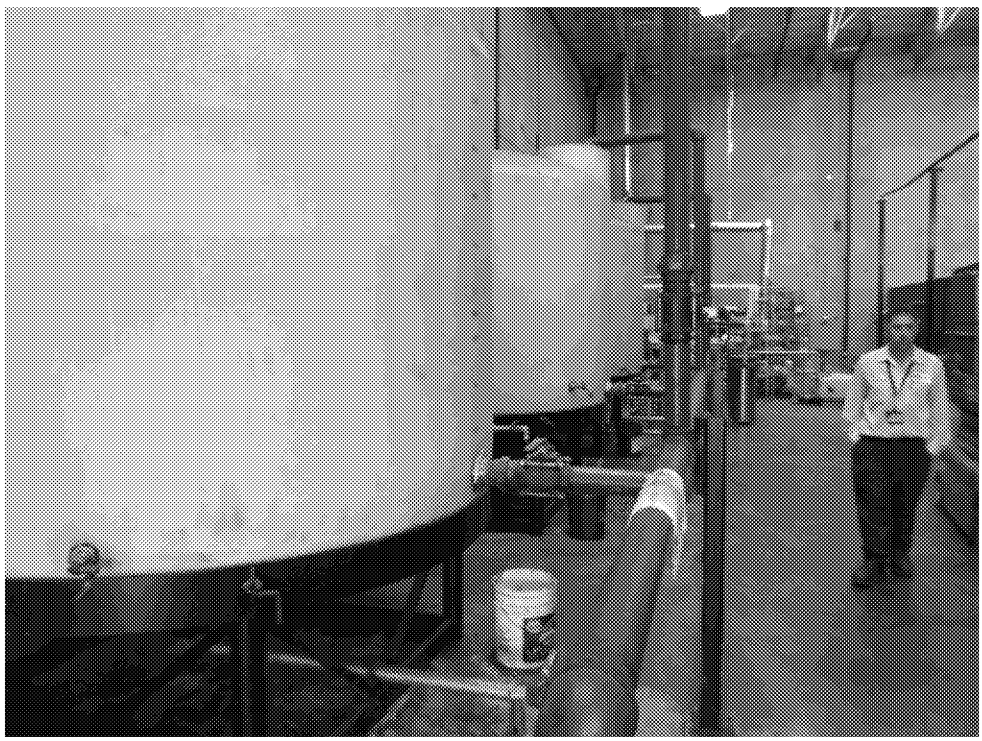
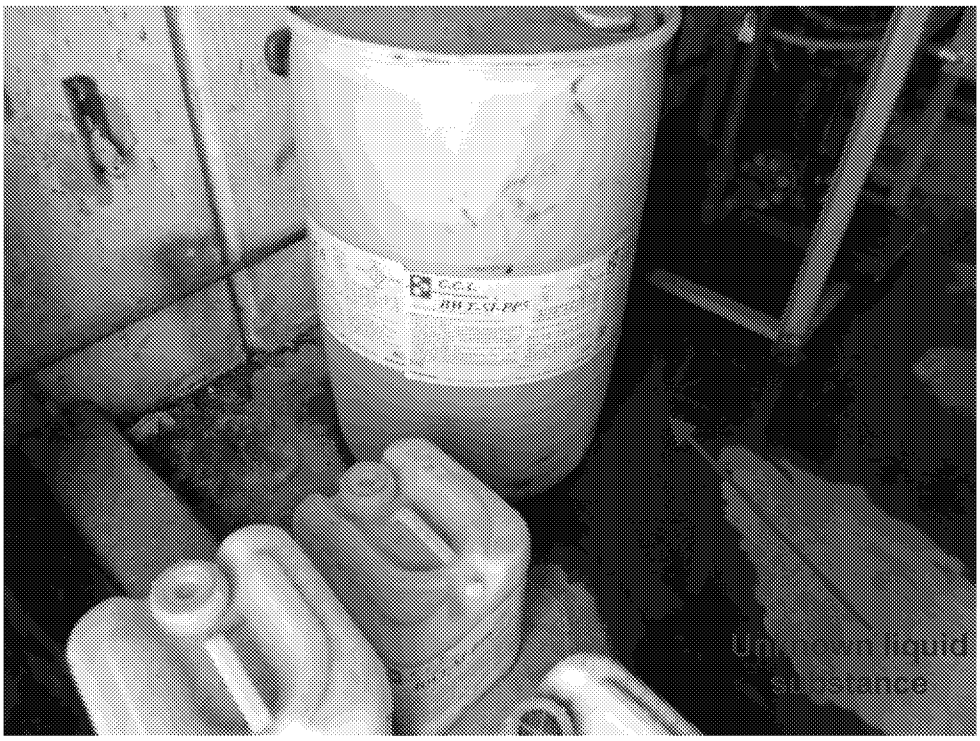


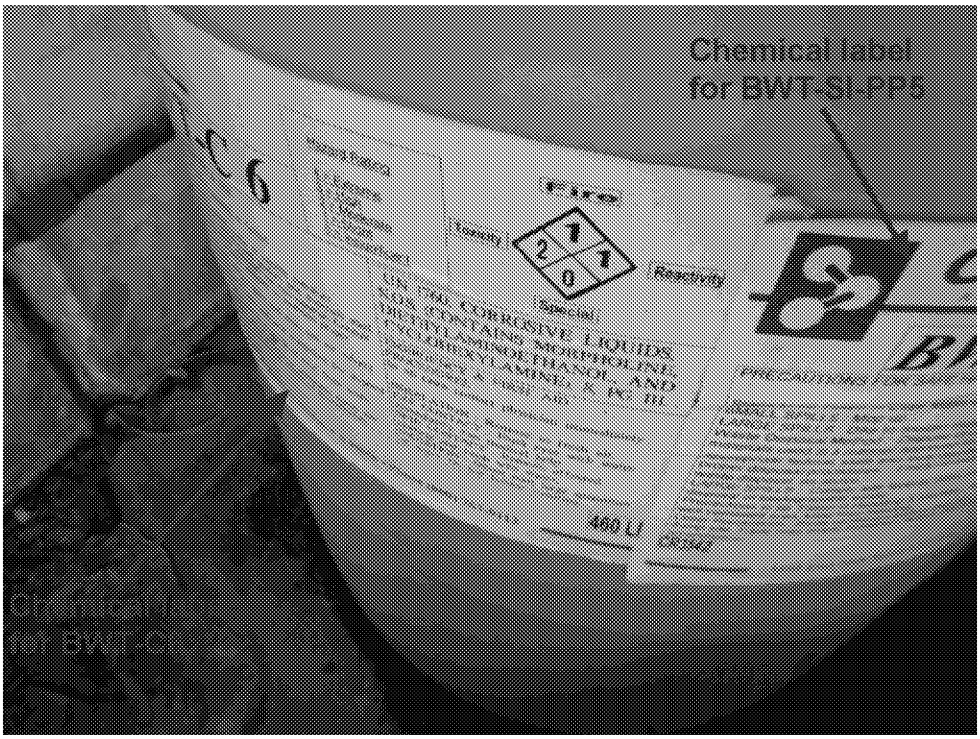
Photograph 13. Example of the network of pipes and hoses used to transport grease throughout the process area at the facility.



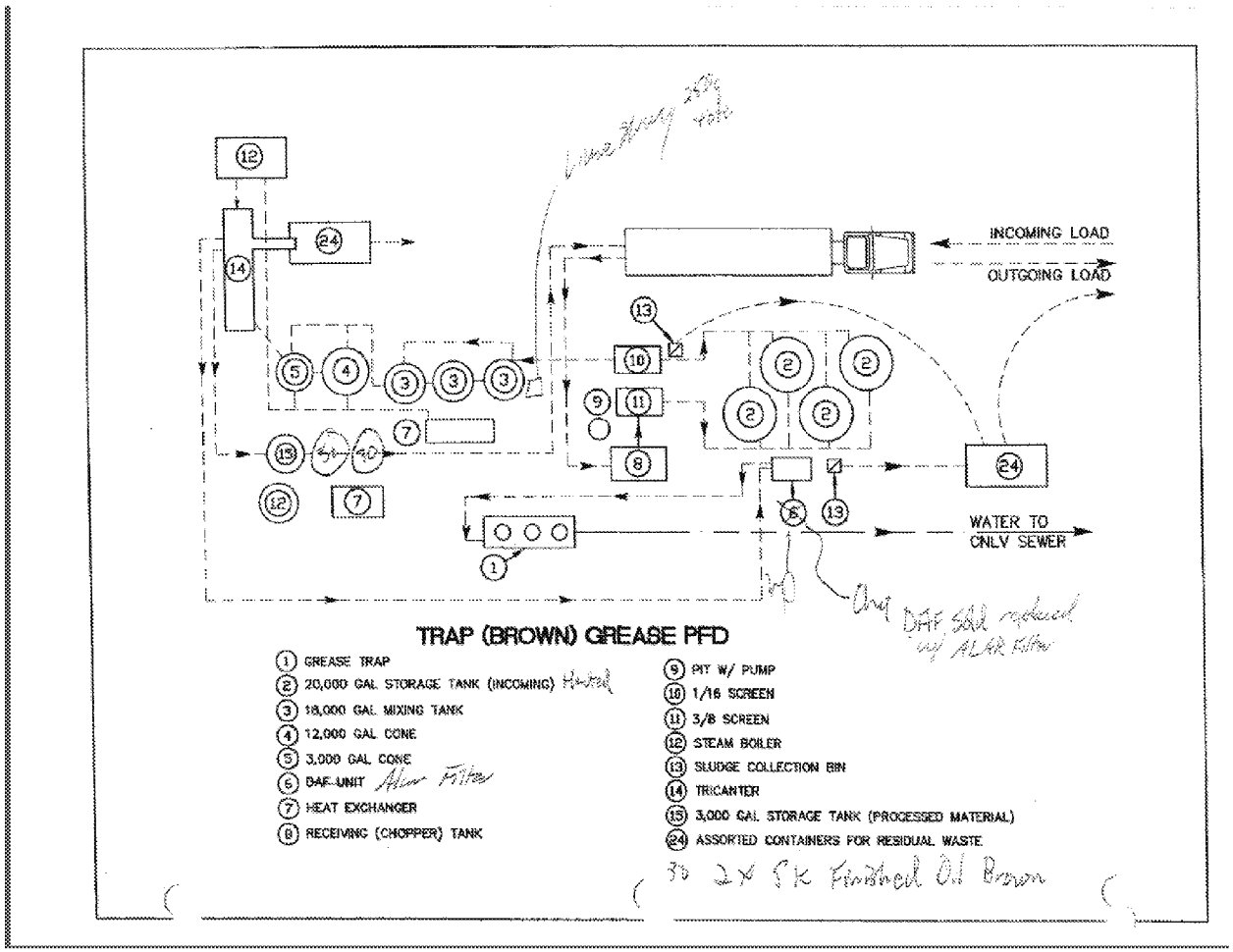
Photograph 14. View of the yellow grease process area, located within the warehouse.



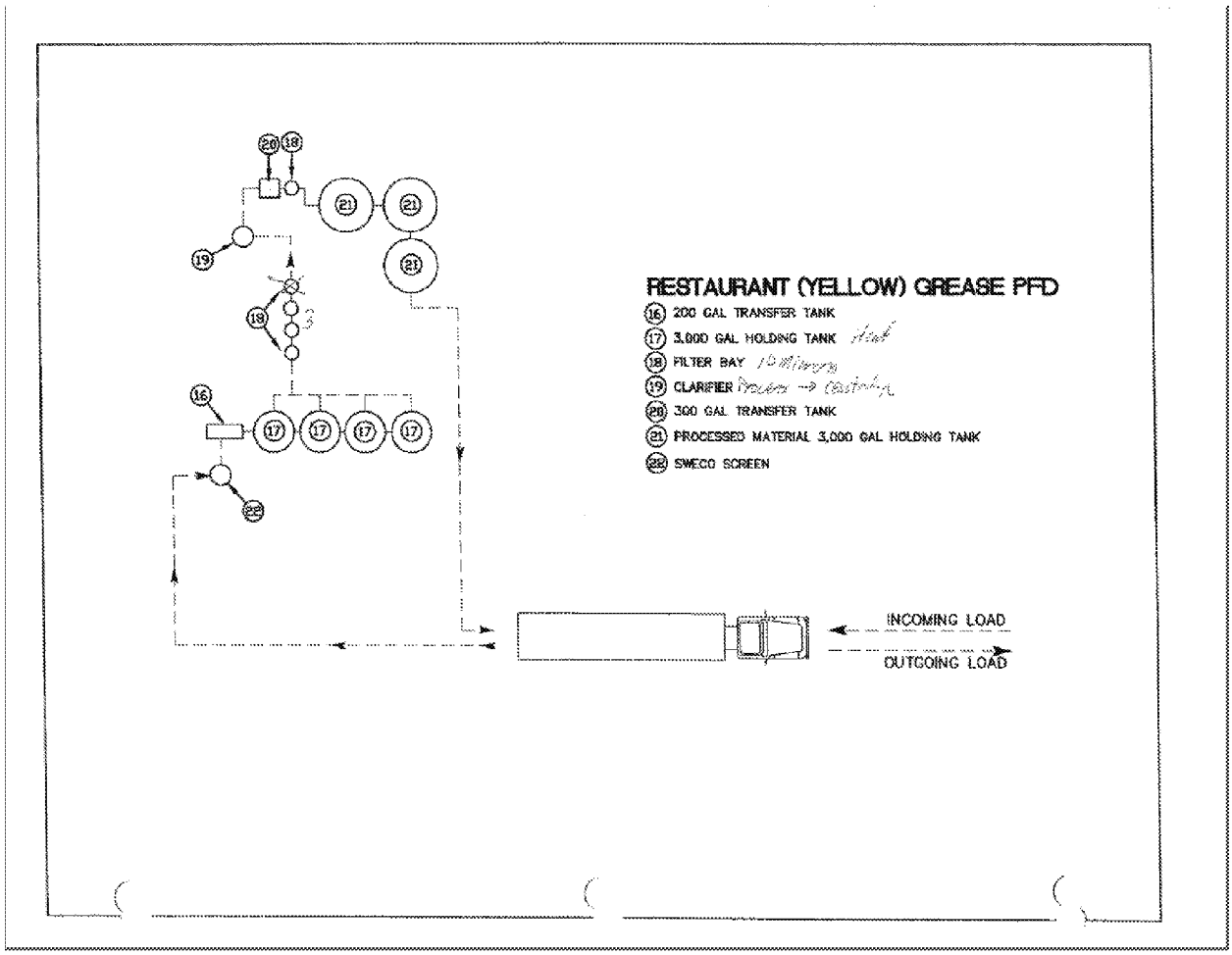
Photograph 15. View of the boiler chemicals stored without secondary containment. Although the liquid on the floor did not omit an odor, the source of the liquid was unknown.



Photograph 16. View of the label on the 55-gallon drum in the boiler room. The drum appeared to have two chemical labels on its side wall: one for BWT-C6 and the other for BWT-SI-PP5. It was unclear to the EPA Inspection Team which chemical was housed in the drum.



Attachment 1.a. Brown Grease Process Area Schematic Diagram



Attachment 1.b. Yellow Grease Process Area Schematic Diagram

Thermofluids, Inc.

Site Visit Data Sheet

SITE VISIT DATA SHEET

INSTRUCTIONS: Record observations made during the IU site visit. Provide as much detail as possible.						
Name of Industry: Thermofluids, Inc.						
Address of Industry: 4000 Arcata Way; North Las Vegas, NV 89030						
Date of visit: 9/30/2014			Time of visit: 9:15 a.m.			
Name of inspector(s): Dominic Marvelli, Pretreatment Inspector, City of North Las Vegas (City) Nikita Lingenfelter, Nevada Division of Environmental Protection Kettie Holland, EPA Contractor, PG Environmental, LLC						
Provide the name(s) and title(s) of industry representative(s)						
Name			**Title**		**Phone/Email**	
Drew Lane			Plant operator		702-642-9994	
IU Permit Number: NLV-19			Exp Date: 5/31/2015		IU Classification: Class I significant industrial user (SIU).	
Inspection Type/Purpose		Scheduled	X	Unscheduled		PCA
	X	PCI		New Company		Complaint
Please provide the following documentation:						
1. Nature of operation: The facility received and recycled used antifreeze; the recycling process involved distilling and blending. The facility also accepted hauled wastewater from a satellite location (at 9 West Delhi Avenue; North Las Vegas), including wastewater and stormwater recovered from oily water separators, car wash interceptors, and water used for testing wells and underground storage tanks (hydrotesting). The wastewaters were hauled from the West Delhi Avenue facility to the Arcata Way facility, where they were pretreated prior to being discharged to the sanitary sewer. See notes 1 and 2 in the Notes section for further information.						
2.	Number of employees	4	Number of shifts:	3	Hours of operation:	24 hours per day, 5 days per week.
3. Water source: City of North Las Vegas						
4. Wastestream flow(s) discharged to the POTW: The facility did not generate or discharge wastewater from its antifreeze recycling process. The other Thermofluids facility located at West Delhi Avenue collected wastewater/stormwater from oily water separators, car wash interceptors, and hydro testing activities. The facility representative stated that the West Delhi Avenue facility treated the collected wastewater/stromwater via a gravity separator and an oil and water separator and then hauled the treated waters to the Arcata Way facility. The facility representative stated that the West Delhi Avenue facility did not have a sewer connection for discharging the collected wastewater, so the company hauled the wastewater to the Arcata Way Facility which was discharged to the City's sanitary sewer. See notes 1 and 2 in the Notes section for further information.						
Sanitary:	Not reviewed (N/R).	Process:	Approximately 4,100 gallons per week.	Combined:	N/R.	
5. Describe any significant changes in process or flow: No significant changes in process or flow were observed at the facility during the time of the inspection.						
6. Type of pretreatment system (Describe): The facility's wastewater pretreatment system consists of a 100-micron sock filter that removes solids from the wastewater and a granularly activated carbon (GAC) unit						

to further filter the wastewater prior to its discharge to the sanitary sewer. The facility representative stated that the sock filter is changed each time the facility discharges wastewater to the sanitary sewer connection. According to the facility representative, the GAC unit is changed approximately every three months.

The facility representative stated that the wastewater collected at the West Delhi Avenue facility is introduced to a gravity separator and an oil/water separator. Once the separation process is complete, the wastewater is hauled to the Arcata Way facility for further treatment and disposal to the sanitary sewer.

NOTE: The pretreatment system is reported as it was observed during the inspection.

	Continuous flow	X	Batch		Combined

7. Condition/operation of pretreatment system (Describe): The pretreatment system was not operating at the time of the inspection. The pretreatment system was located outside at the central area of the facility, north of the main process building.

Any unusual conditions or problems with the pretreatment system: No unusual conditions or problems were observed with the pretreatment system at the time of the inspection.

8. Process area description (identify raw materials and processes used): The facility's recycling operation consisted of distilling and purifying the used antifreeze to prepare it for reuse. The facility collected and hauled the used antifreeze from Jiffy Lube and other automotive facilities in 5,000-gallon tanker trucks. The used antifreeze was pumped from the tanker trunks to one of three 12,590-gallon storage tanks. The facility representative stated that company policy dictated filling the storage tanks to 90% of their total capacity.

From the storage tanks, the used antifreeze was pumped to the distillation area in the main process building. There, the used antifreeze was filtered by a 10-micron filter to remove solids and debris. Next, it was pumped to what the facility representative referred to as "pretreatment tanks," each with a 6,500 gallon capacity, where it was chemically treated. After that, it was pumped to a clarifying tank and then to one of two feeder tanks. Then the antifreeze was sent through a distillation unit to remove any excess water. The treated antifreeze was stored in a different tank before undergoing a second distillation process. The antifreeze was blended with a glycol mixture to form the final product.

The slurry from the pretreatment tanks was introduced into a filter press to form filter cake, which was hauled offsite for disposal.

9. Condition/operation of process area (Describe): The process area was small and crowded due to the size of tanks and equipment used for the antifreeze recycling process.

Any unusual conditions or problems with the process area: The facility may be discharging wastewater to the sewer generated from potential categorical operations. Refer to note 2 in the Notes section for further detail.

10. General housekeeping in process area (Describe): The process area was relatively clean and free of debris.

Any unusual conditions or problems with general housekeeping in process area: No unusual conditions or problems with general housekeeping were noted in the process area at the time of the inspection.

11. Chemical storage area (identify the chemicals that are maintained on-site and how they are stored): The majority of the chemicals at the facility were stored at a warehouse located north of the main process building. During the inspection of the warehouse, the inspection team identified approximately fourteen 275-gallon totes of antifreeze and three rows of 55-gallon drums stacked three levels high; none had secondary containment. A floor drain was located inside one of the closets at the warehouse, but it

	appeared to be blocked with solid debris at the time of the inspection. See notes 3 and 4 in the Notes section for further detail.					
	Any floor drains?	Yes.	Any spill control measures?	No. See notes 3 and 4 in the Notes section.		
	General housekeeping of chemical storage area (Describe): The chemical storage area in the warehouse was clean and free of debris during the inspection.					
12.	Are hazardous wastes drummed and labeled? N/R.					
13.	Does the IU have hazardous waste manifests? The facility representative stated that the facility did not generate hazardous waste.					
	Any problems associated with hazardous waste: No problems associated with hazardous waste were noted during the time of the inspection.					
14.	Solid waste production: The facility produced solid waste in the form of filter cake from the antifreeze recycling process and spent filters from the wastewater treatment process.					
	Solid waste disposal method(s): The filter cake from the antifreeze recycling process was disposed of at the Las Vegas Paving Hydrocarbon facility.					
15.	Description of sample location: The sampling point at the facility was located north and directly outside of the main process building at a manhole near the wastewater pretreatment sock filter and GAC unit.					
	Sampling method/technique: The facility was required to collect grab and composite samples.					
16.	Evaluation of self-monitoring data?		Yes	X	No	N/A
	If yes, was self-monitoring adequate: Not applicable.					
17.	Who performs the self-monitoring analysis? This component was not reviewed as part of the inspection.					

Notes:

1. At the beginning of the facility inspection, the facility representative stated that the facility had a sanitary sewer connection point, located to the north of the main process building. This connection point was primarily used by Thermofluids, Inc.'s facility at 9 West Delhi Avenue (North Las Vegas) to discharge wastewater. At the 9 West Delhi Avenue facility, wastewater and stormwater recovered from oily water separators, car wash interceptors, and hydrotesting waters were collected and ultimately hauled to the Arcata Way facility for treatment and discharge to the City's sanitary sewer.

   According to Chapter 13.28.085 of the City's SUO, "It is unlawful for any user to discharge or cause to be discharged into the system any rainwater, stormwater, groundwater, street drainage, subsurface drainage… or other uncontaminated water, other than air conditioning condensate." According to the information provided by the facility representative, wastewater with the potential to contain rainwater, stormwater, groundwater, and street drainage was being discharged to the sanitary sewer from the facility. The City is required to ensure that the facility is not discharging these prohibited waters to the City's sewer system in accordance with section 13.28.085 of the City's SUO.

2. Although wastewater was not generated at the Arcata Way facility, potential non-hazardous oily wastes were being collected from interceptors and storm drains and were taken to the West New Delhi facility for treatment. The wastewaters were then hauled to the Arcata Way facility from the West New Delhi facility to be further treated and ultimately discharged to the City's sanitary sewer. According to the information provided by the facility representative and the observations made during the inspection, non-hazardous wastewater pumped from oily/water separators (potentially containing oily wastes) were collected from various locations and hauled from the West Delhi Avenue facility to the Arcata Way facility. At the Arcata Way facility, the wastewater was treated and discharged to the City's sanitary

sewer. These activities may be indicative of the facility acting as a centralized waste treatment facility, which is subject to the categorical regulations at 40 CFR 437.

According to the federal regulations at 40 CFR 403.8(f)(2)(iii), the City is required to notify each significant industrial user of its status as such and of all requirements applicable to it as a result of such status. Due to the potential for non-hazardous oily waste to be generated, collected and hauled to the facility, and ultimately discharged to the sewer from the Arcata way facility, the City is required to further evaluate the operations at the facility and assess the facility's potential classification as a CIU. The City is required to ensure that it properly notifies each significant industrial user of its status as such and of all requirements applicable to it as a result of such status in accordance with the federal regulations at 40 CFR 403.8(f)(2)(iii). The City should ensure that it properly classifies the facility and includes applicable categorical (including sub-category) limits within the facility's permit so that the facility is aware of what it is required to comply with.

3. During the inspection, the inspection team observed a significant quantity of antifreeze and other chemicals without secondary containment or other spill control measures in the chemical storage area located at the warehouse. The City inspector asked the facility representative about secondary containment for the warehouse and the facility representative responded that the facility was thinking about including a containment berm around the area. It is recommended that the City follow up with the facility to ensure that chemicals are properly stored and contained.

4. The floor drain located in a closet at the facility's warehouse appeared to be unintentionally blocked with solid debris, but was not completely sealed. It is strongly recommended that the City conduct a followup inspection to determine the potential for chemicals in the warehouse to be discharged to the sanitary sewer from the floor drain. Further, the City should determine if the floor drain needs a more permanent seal and should inspect the floor drain area as part of its annual inspection.

5. The facility representative stated that tanker truck interiors are washed at the Arcata Way facility. Specifically, the tanker truck interiors are washed between cycles when the facility switches from hauling used product to hauling fresh antifreeze (and vice versa). The facility representative stated that the wastewater from the truck washing operations was collected in a sump at the truck washing area of the facility. From there it was pumped to the 12,590-gallon storage tank, where it was stored prior to being used in the antifreeze recycling process.

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Attachment 2

EPA Model Permit Application

ED_002461_00010486-00092

APPENDIX C

Sample Permit Application Form

ED_002461_00010486-00093

Disclaimer

The U.S. Environmental Protection Agency (EPA), Office of Wastewater Management, Water Permits Division has prepared this sample permit application as a guide for Control Authorities in developing a permit application form. The Control Authority is not required to use this permit application form and may develop either its own form or choose to modify the sample form to reflect specific conditions at the publicly owned treatment works (POTW) and requirements of state and local law. For the Control Authority choosing to use a modified version of the sample application, the EPA sample permit application provides, as an aid to the Control Authority, blank spaces or brackets throughout the application. These identify areas in which additions and changes to the sample application might be needed to address the circumstances at a POTW. The sample has additional bracketed notes that further explain issues the Control Authority might wish to consider when developing its permit application form.

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APPENDIX C.
SAMPLE PERMIT APPLICATION FORM

Note: Please read all attached instructions prior to completing this application.

SECTION A – GENERAL INFORMATION

1.	Facility Name:		
	a. Operator Name:		
	b. Is the operator identified in 1.a., the owner of the facility?	Yes	No
	If no, provide the name and address of the operator and submit a copy of the contract and/or other documents indicating the operator's scope of responsibility for the facility.		
2.	Facility Address: Street:		
	City:	State:	Zip:
3.	Business Mailing Address: Street or P.O. Box:		
	City:	State:	Zip:
4.	Designated signatory authority of the facility: [Attach similar information for each authorized representative]		
	Name:		
	Title:		
	Address:		
	City:	State:	Zip:
	Phone #		
5.	Designated facility contact:		
	Name:		
	Title:		
	Phone #		
6.	***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]*** Do you wish to be considered for regulation under a general permit, if the Control Authority considers it to be appropriate? If so, you must file a request for coverage under a general control mechanism. **[POTW's should include list of available general control mechanisms]**	Yes	No

SECTION B – BUSINESS ACTIVITY

1. If your facility employs or will be employing processes in any of the industrial categories or business activities listed below (regardless of whether they generate wastewater, waste sludge, or hazardous wastes), place a check beside the category of business activity (check all that apply).

	Industrial Categories
☐	Aluminum Forming
☐	Asbestos Manufacturing
☐	Battery Manufacturing
☐	Can Making
☐	Canned and Preserved Fruit and Vegetable Processing
☐	Canned and Preserved Seafood
☐	Carbon Black Manufacturing
☐	Cement Manufacturing
☐	Centralized Waste Treatment
☐	Coal Mining
☐	Coil Coating
☐	Concentrated Animal Feeding Operation and Feedlots
☐	Concentration Aquatic Animal Production
☐	Copper Forming
☐	Dairy Product Processing or Manufacturing
☐	Electric and Electronic Components Manufacturing
☐	Electroplating
☐	Explosives Manufacturing
☐	Fertilizer Manufacturing
☐	Ferroalloy Manufacturing
☐	Foundries (Metal Molding and Casting)
☐	Glass Manufacturing
☐	Grain Mills
☐	Gum and Wood Chemicals Manufacturing
☐	Hospital
☐	Ink Formulation
☐	Inorganic Chemicals
☐	Iron and Steel
☐	Landfill
☐	Leather Tanning and Finishing
☐	Meat and Poultry Products
☐	Metal Finishing
☐	Metal Products and Machinery
☐	Mineral Mining and Processing
☐	Nonferrous Metals Forming
☐	Nonferrous Metals Manufacturing
☐	Oil and Gas Extraction
☐	Ore Mining
☐	Organic Chemicals Manufacturing
☐	Paint and Ink Formulating

- [ ] Paving and Roofing Manufacturing
- [ ] Pesticides Chemical Manufacturing, Formulating, and/or Packaging
- [ ] Petroleum Refining
- [ ] Pharmaceutical Manufacturing
- [ ] Phosphate Manufacturing
- [ ] Photographic Processing
- [ ] Plastic and Synthetic Materials Manufacturing
- [ ] Porcelain Enameling
- [ ] Printed Circuit Board Manufacturing
- [ ] Pulp, Paper, and Fiberboard Manufacturing
- [ ] Rubber Manufacturing
- [ ] Soap and Detergent Manufacturing
- [ ] Steam Electric Power Generating
- [ ] Sugar Processing
- [ ] Textile Mills
- [ ] Timber Products
- [ ] Transportation Equipment Cleaning
- [ ] Waste Combustors
- [ ] Other (Describe)

2. Give a brief description of all operations at this facility including primary products or services (attach additional sheets if necessary):

3. Indicate applicable North American Industry Classification System (NAICS) for all processes:

a.	
b.	
c.	
d.	
e.	

4. Production Rate

Product	Past Calendar Year Amounts per Day (Daily Units)		Estimate This Calendar Year Amounts Per Day (Daily Units)	
	Average	Maximum	Average	Maximum

5. For production-based categorical IUs only:

What is the facility's long-term average categorical production rate for the past 5 years?

SECTION C – WATER SUPPLY

1.	Water Sources: (Check as many as are applicable.)	
		Private Well
		Surface Water
		Municipal Water Utility (Specify City):
		Other (Specify):

2.	Name (as listed on the water bill):		
	Street:		
	City:	State:	Zip:
3.	Water service account number:		

4. List average water usage on premises: [new facilities may estimate]

	Type	Average Water Usage (GPD)	Indicate Estimated (E) or Measured (M)
a.	Contact cooling water		
b.	Non-contact cooling water		
c.	Boiler feeding		
d.	Process		
e.	Sanitary		
f.	Air pollution control		
g.	Contained in product		
h.	Plant and equipment washdown		
i.	Irrigation and lawn watering		
j.	Other		
k.	Total of a through j		

SECTION D – SEWER INFORMATION

1.	a. For an existing business: Is the building presently connected to the public sanitary sewer system?			
	Yes	Sanitary sewer account number----		
	No	Have you applied for a sanitary sewer hookup?	Yes	No
	b. For a new business:			
	(i).	Will you be occupying an existing vacant building (such as in an industrial park)?	Yes	No
	(ii).	Have you applied for a building permit if a new facility will be constructed?	Yes	No
	(iii).	Will you be connected to the public sanitary sewer system?	Yes	No

2. List size, descriptive location, and flow of each discharge pipe or discharge point which connects to the City's sewer system. (If more than three, attach additional information on another sheet.)

Descriptive Location of Sewer Connection or Discharge Point	Average Flow (GPD)

SECTION E – WASTEWATER DISCHARGE INFORMATION

1.	Does (or will) this facility discharge any wastewater other than from restrooms to the City sewer?						
	Yes	If the answer to this question is "yes," complete the remainder of the application.					
	No	If the answer to this question is "no," skip to Section I.					
2.	Provide the following information on wastewater flow rate. [New facilities may estimate.]						
	a. Hours/day discharged (e.g., 8 hours/day)						
	M	T	W	TH	F	SAT	SUN
	b. Hours of discharge (e.g., 9 a.m. to 5 p.m.)						
	M	T	W	TH	F	SAT	SUN
	c. Peak hourly flow rate	(GPD)					
	d. Maximum daily flow rate	(GPD)					
	e. Annual daily average	(GPD)					
3.	If batch discharge occurs or will occur, indicate: [New facilities may estimate.]						
	a. Number of batch discharges	(per day)					
	b. Average discharge per batch	(GPD)					
	c. Time of batch discharges	(days of week)	(hours of day)				
	d. Flow rate	(gallons per minute)					
	e. Percent of total discharge						

4.	Schematic Flow Diagram -- For each major activity in which wastewater is or will be generated, draw a diagram of the **flow of materials, products, water, and wastewater** from the start of the activity to its completion, showing all unit processes. Indicate which processes use water and which generate wastestreams. Include the average daily volume and maximum daily volume of each wastestream [new facilities may estimate]. If estimates are used for flow data this **must** be indicated. **Number each unit process** having wastewater discharges to the community sewer. Use these numbers when showing this unit processes in the building layout in Section H.

5. List average wastewater discharge, maximum discharge, and type of discharge (batch, continuous, or both), for each plant process. Include the reference number from the process schematic that corresponds to each process. [New facilities should provide estimates for each discharge].

No.	Process Description	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (batch, continuous, none)

6. List the average wastewater discharge, maximum discharge, and type of discharge (batch, continuous, or both) for each of nonprocess wastewater flows (i.e., cooling tower blowdown, boiler blowdown)

No.	Nonprocess Description	Average Flow (GPD)	Maximum Flow (GPD)	Type of Discharge (bath, continuous, none)

7. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow equipment at this facility?

		Yes	No	N/A
Current	Flow Metering			
	Sampling Equipment			
Planned	Flow Metering			
	Sampling Equipment			

If so, please indicate the present or future location of this equipment on the sewer schematic and describe the equipment below:

8. Are any process changes or expansions planned during the next three years that could alter wastewater volumes or characteristics? Consider production processes as well as air or water pollution treatment processes that may affect the discharge.

	Yes
	No, (skip to Question 10)

9.	Briefly describe these changes and their effects on the wastewater volume and characteristics: (attach additional sheets if needed).		
10.	Are any recycling or reclamation system in use or planned?		
	Yes		
	No (skip to Question 12)		
11.	Briefly describe recovery process, substance recovered, percent recovered, and the concentration in the spent solution. Submit a flow diagram for each process (attach additional sheets if needed):		
12.	***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]*** As allowed at 40 CFR 403.6(c)(5) when the limits in a categorical Pretreatment Standard are expressed only in terms of pollutant concentration, an Industrial User may request that the Control Authority convert the limits to equivalent mass limits. Do you anticipate that you will make this request?	Yes	No
13.	***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]*** As allowed at 40 CFR 403.6(c)(6), an Industrial User subject to the mass limits of categorical Pretreatment Standards to 40 CFR Parts 414, 419, and/or 455 may request that the Control Authority convert the mass limits to equivalent concentration limits. Do you anticipate that you will make this request?	Yes	No

SECTION F – CHARACTERISTICS OF DISCHARGE

All current industrial users are required to submit monitoring data on all pollutants that are regulated specific to each process. Use the tables provided in this section to report the analytical results. **Do not leave blanks.** For all other (nonregulated) pollutants, indicate whether the pollutant is known to be present (P), suspected to be present (S), or known not to be present (O), by placing the appropriate letter in the column for average reported values. Indicate on either the top of each table, or on a separate sheet, if necessary, the sample location and type of analysis used. Be sure methods conform to 40 CFR Part 136; if they do not, indicate what method was used.

New dischargers should use the table to indicate what pollutants will be present or are suspected to be present in proposed wastestreams by placing a P (expected to be present), S (may be present), or O (will not be present) under the average reported values.

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
Acenaphthene								
Acrolein								
Acrylonitrile								
Benzene								
Benzidine								
Carbon Tetrachloride								
Chlorobenzene								
1,2,4-Trichlorobenzene								
Hexachlorobenzene								
1,2-Dichloroethane								
1,1,1-Trichloroethane								
1,1,2,2,-Tetrachloroethane								
Chloroethane								
Bis(2-Chloroethyl)ether								
17 Bis (chloro methyl) ether								
2-Chloroethyl vinyl Ether								
2-Chloronaphthalene								
2,4,6-Trichlorophenol								
Parachlorometa cresol								
Chloroform								
2-Chlorophenol								
1,2-Dichlorobenzene								
1,3-Dichlorobenzene								
1,4-Dichlorobenzene								
3,3'-Dichlorobenzidine								
1,1-Dichloroethylene								
1,2-Trans-Dichloroethylene								
2,4-Dichlorophenol								
1,2-Dichloropropane								
1,2-Dichloropropylene								
1,3-Dichloropropylene								
2,4-Dimethylphenol								
2,4-Dinitrotoluene								
2,6-Dinitrotoluene								
1,2-Diphenylhydrazine								
Ethylbenzene								
Fluoranthene								

APPENDIX C **Sample Permit Application Form**

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
4-Chlorophenyl Phenyl Ether								
4-Bromophenyl Phenyl Ether								
Bis(2-Chloroethyl)ether								
Bis(2-chloroethoxy)methane								
Methylene Chloride								
Methyl Chloride								
Bromoform								
Dichlorobromomethane								
Chlorodibromomethane								
Hexachlorobutadiene								
Hexachlorocyclopentadiene								
Isophorone								
Naphthalene								
Nitrobenzene								
Nitrophenol								
2-Nitrophenol								
4-Nitrophenol								
2,4-Dinitrophenol								
4,6-Dinitro-O-Cresol								
N-Nitrosodimethylamine								
N-Nitrosodiphenylamine								
N-Nitrosodi-N-Propylamine								
Pentachlorophenol								
Phenol								
Bis(2-ethylyhexyl)phthalate								
Butylbenzyl Phthalate								
Di-N-Butyl Phthalate								
Di-N-Octyl Phthalate								
Diethyl Phthalate								
Dimethyl Phthalate								
Benzo(a)anthracene								
Benzo(a)pyrene								
3,4-Benzofluoranthene								
Benzo(k)fluoranthene								
Chrysene								
Acenaphthylene								
Anthracene								
Benzo(ghi)perylene								
Fluorene								
Phenanthrene								
Dibenzo(a,h)anthracene								
Indeno(1,2,3-cd)pyrene								
Pyrene								
Tetrachloroethylene								
Toluene								
Trichloroethylene								
Vinyl Chloride								
Aldrin								
Dieldrin								
Chlordane								
4,4'-DDT								
4,4'-DDE								

APPENDIX C **Sample Permit Application Form**

Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
4,4'-DDD								
Alpha-Endosulfan								
Beta-Endosulfan								
Endosulfan Sulfate								
Endrin								
Endrin Aldehyde								
Heptachlor								
Heptachlor Epoxide								
Alpha-BHC								
Beta-BHC								
Gamma-BHC								
Delta-BHC								
PCB-1242								
PCB-1254								
PCB-1221								
PCB-1232								
PCB-1248								
PCB-1260								
PCB-1016								
Toxaphene								
(TCDD)								
Asbestos								
Acidity								
Alkalinity								
Bacteria								
BOD_5								
Chloride								
Chlorine								
Fluoride								
Hardness								
Magnesium								
NH_3-N								
Oil and Grease								
TSS								
TOC								
Kjeldahl N								
Nitrate N								
Nitrite N								
Organic N								
Orthophosphate P								
Phosphorous								
Sodium								
Specific Conductivity								
Sulfate (SO_4)								
Sulfide (S)								
Sulfite (SO_3)								
Antimony								
Arsenic								
Barium								
Beryllium								
Cadmium								
Chromium								

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Pollutant	Detection Level Used	Maximum Daily Value		Average of Analyses		Number of Analyses	Units	
		Conc.	Mass	Conc.	Mass		Conc.	Mass
Copper								
Cyanide								
Lead								
Mercury								
Nickel								
Selenium								
Silver								
Thallium								
Zinc								
Any additional pollutants regulated by state or local laws:								

[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.] Do you anticipate requesting a monitoring waiver for regulated pollutants which you believe to not be present in your process wastestream(s)?	Yes	No
[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.] In order to request a monitoring waiver for pollutants not present, you must provide data from at least one sampling of your facility's wastewater prior to any treatment present at your facility that is representative of all wastewater from all processes. The request of a monitoring waiver must be signed in accordance with 40 CFR 403.12(l), and include the certification statement in 40 CFR 403.6(a)(2)(ii). Do you wish to make this request?	Yes	No

SECTION G - TREATMENT

1.	Is any form of wastewater treatment (see list below) practiced at this facility?	
	☐	Yes
	☐	No
2.	Is any form of wastewater treatment (or changes to an existing wastewater treatment) planned for this facility within the next three years?	
	☐	Yes, describe:
	☐	No
3.	Treatment devices or processes used or proposed for treating wastewater or sludge (check as many as appropriate).	
	☐	Air flotation
	☐	Centrifuge
	☐	Chemical precipitation
	☐	Chlorination
	☐	Cyclone
	☐	Filtration
	☐	Flow equalization
	☐	Grease or oil separation, type:
	☐	Grease trap
	☐	Grinding filter
	☐	Grit removal
	☐	Ion exchange
	☐	Neutralization, pH correction
	☐	Ozonation
	☐	Reverse osmosis
	☐	Screen
	☐	Sedimentation
	☐	Septic tank
	☐	Solvent separation
	☐	Spill protection
	☐	Sump
	☐	Rainwater diversion or storage
	☐	Biological treatment, type:
	☐	Other chemical treatment, type:
	☐	Other physical treatment, type:
	☐	Other, type:
4.	Is process wastewater mixed with nonprocess wastewater prior to the sampling point?	
	☐	Yes, describe:
	☐	No

4.	Description Describe the pollutant loadings, flow rates, design capacity, physical size, and operating procedures of each treatment facility checked above.		
5.	Attach a process flow diagram for each existing treatment system. Include process equipment, by-products, by-product disposal method, waste and by-product volumes, and design and operating conditions.		
6.	Describe any changes in treatment or disposal methods planned or under construction for the wastewater discharge to the sanitary sewer. Please include estimated completion dates.		
7.	Do you have a treatment operator?	Yes	No
	(If Yes) Name:		
	Title:		
	Phone:		
	Full time (specify hours):		
	Part time (specify hours):		
8.	Do you have a manual on the correct operation of your treatment equipment?	Yes	No
9.	Do you have written maintenance schedule for your treatment equipment?	Yes	No

SECTION H – FACILITY OPERATIONAL CHARACTERISTICS

1. Shift Information

		Mon	Tues	Wed	Thur	Fri	Sat	Sun
Work days								
Shifts per work day								
Employees per shift	1st							
	2nd							
	3rd							
Shift start and end times	1st							
	2nd							
	3rd							

2. Indicate whether the business activity is:

☐ Continuous through the year, or

☐ Seasonal (circle the months of the year during which the business occurs):

J	F	M	A	M	J	J	A	S	O	N	D

Comments:

3. Indicate whether the facility discharge is:

☐ Continuous through the year, or

☐ Seasonal (circle the months of the year during which the business occurs):

J	F	M	A	M	J	J	A	S	O	N	D

Comments:

4. Does operation shut down for vacation, maintenance, or other reasons?

☐ Yes, indicate reasons and period when shutdown occurs

☐ No

5. List types and amounts (mass or volume per day) of raw materials used or planned for use (attach list if needed):

6. List types and quantity of chemicals used or planned for use (attach list if needed). Include copies of Material Safety Data Sheets (if available) for all chemicals identified.

Chemical	Quantity

7. Building Layout – Draw to scale the location of each building on the premises. Show map orientation and location of all water meters, storm drains, numbered unit processes (from schematic flow diagram), public sewers, and each facility sewer line connected to the public sewers. **Number each sewer** and show existing and proposed sampling locations.

A blueprint or drawing of the facilities showing the above items may be attached in lieu of submitting a drawing on this sheet.

SECTION I – SPILL PREVENTION

1.	Do you have chemical storage containers, bins, or ponds at your facility?	Yes	No
	If yes, please give a description of their location, contents, size, type, and frequency and method of cleaning. Also indicate in a diagram or comment on the proximity of these containers to a sewer or storm drain. Indicate if buried metal containers have cathodic protection.		
2.	Do you have floor drains in your manufacturing or chemical storage area(s)?	Yes	No
	If yes where do they discharge to?		
3.	If you have chemical storage containers, bins, or ponds in manufacturing area, could an accidental spill lead to a discharge to (check all that apply):		
	an onsite disposal system		
	public sanitary sewer system (e.g., through a floor drain)		
	storm drain		
	to ground		
	other, specify:		
	not applicable, no possible discharge to any of the above routes		
4.	Do you have an accidental spill prevention plan (ASPP) to prevent spills of chemicals or slug discharges from entering the Control Authority's collection systems?		
	Yes – **[Please enclose a copy with the application.]**		
	No		
	N/A, not applicable since there are no floor drains and/or the facility discharge(s) only domestic wastes.		
5.	Please describe below any previous spill events and remedial measures taken to prevent their reoccurrence.		

SECTION J – BEST MANAGEMENT PRACTICES

1.	Describe the types of best management practices (BMPs) you employ to prevent pollutants from entering a facility's wastestream or from reaching a discharge point. BMPs are management and operational procedures such as schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to implement the general and specific prohibitions listed in 40 CFR 403.5(a)(1) and (b). BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage.		
2.	Do you have the potential for a slug discharge to the sewer system? A slug discharge is any discharge of a non-routine episodic nature, including but not limited to an accidental spill or a non-customary batch discharge, which has a reasonable potential to cause interference or pass through, or in any other way violate the POTW's regulations, local limits or permit conditions [40 CFR 403.8(f)(2)(v).	Yes	No
	Please describe the type of the potential slug discharge, including quality and content.		
	Please describe current mechanisms for prevention of slug discharges.		
	Please describe where and how raw materials are stored.		

SECTION K – NON-DISCHARGED WASTES

1. Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system?

	Yes, please describe below
	No, skip the remainder of Section J

Waste Generated	Quantity (per year)	Disposal Method

2. Indicate which wastes identified above are disposed of at an off-site treatment facility and which are disposed of on-site.

3. If any of your wastes are sent to an off-site centralized waste treatment facility, identify the waste and the facility.

4. If an outside firm removes any of the above checked wastes, state the name(s) and address(es) of all waste haulers:

a.		b.	
	Permit No. (if applicable):		Permit No. (if applicable):

5. Have you been issued any Federal, State, or local environmental permits?

	Yes
	No

If yes, please list the permit(s):

6. Describe where and how waste liquids and sludges are stored.

SECTION L – AUTHORIZED SIGNATURES

Compliance certification:

1. Are all applicable Federal, State, or local pretreatment standards and requirements being met on a consistent basis?

	Yes
	No
	Not yet discharging

2. If **No**:

a.	What additional operations and maintenance procedures are being considered to bring the facility into compliance? Also, list additional treatment technology or practice being considered in order to bring the facility into compliance.
b.	Provide a schedule for bringing the facility into compliance. Specify major events planned along with reasonable completion dates. Note +that if the Control Authority issues a permit to the applicant, it may establish a schedule for compliance different from the one submitted by the facility.

Milestone Activity	Completion Date

Authorized Representative Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name(s) Title

Signature Date Phone

ED_002461_00010486-00116

INSTRUCTIONS TO FILL OUT WASTEWATER DISCHARGE PERMIT APPLICATION

The permit application must be completed through question E.1. If you answer "no" to question E.1., you may skip to Section I. Otherwise, if a question is not applicable, indicate so on the form. Instructions to some questions on the permit application are given below.

SECTION A – INSTRUCTIONS (GENERAL INFORMATION)

1. Enter the facility's official or legal name. Do not use a colloquial name.

   a. Operator Name: Give the name, as it is legally referred to, of the person, firm, public organization, or any other entity which operates the facility described in this application. This may or may not be the same name as the facility.

   b. Indicate whether the entity which operates the facility also owns it by marking the appropriate box:

      (i) If the response is "No," clearly indicate the operator's name and address and submit a copy of the contract and/or other documents indicating the operator's scope of responsibility for the facility.

2. Provide the physical location of the facility that is applying for a discharge permit.

3. Provide the mailing address where correspondence from the Control Authority may be sent.

4. Provide all the names of the authorized signatories for this facility for the purposes of signing all reports. The designated signatory is defined as:

   a. A responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

      (i) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or

      (ii) the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

   b. A general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

   c. The principal executive officer or director having responsibility for the overall operation of the discharging facility if the Industrial User submitting the reports is a Federal, State, or local governmental entity, or their agents.

d. A duly authorized representative of the individual designated in paragraph (a), (b), or (c) of this section if:

(i) the authorization is made in writing by the individual described in paragraph (a), (b), or (c);

(ii) the authorization specifies either an individual or position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and

(iii) the written authorization is submitted to the City.

e. If an authorization under paragraph (d) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of paragraph (d) of this section must be submitted to the City prior to or together with any reports to be signed by an authorized representative.

5. Provide the name of a person who is thoroughly familiar with the facts reported on this form and who can be contacted by the Control Authority (e.g., the plant manager).

6. ***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]***

   Indicate if the facility would like to be considered for regulation under a general permit.

SECTION B – INSTRUCTIONS (BUSINESS OPERATIONS)

1. Check off all operations that occur or will occur at your facility. If you have any questions regarding how to categorize your business activity, contact the Control Authority for technical guidance.

2. Provide a brief narrative description of all operations at this facility.

3. For all processes found on the premises, indicate the NAICS (North America Industry Classification System) code which replaces the Standard Industrial Classification (SIC) system. To determine the NAICS code for a facility see *North American Industry Classification System--United States, 2002* which includes definitions for each industry, tables showing correspondence between 2002 NAICS and 1997 NAICS for codes that changed, and a comprehensive index--features also available on this web site. To order the 1400-page *2002 Manual*, in print, call NTIS at (800) 553-6847 or (703) 605-6000, or check the NTIS web site. The 1250-page *1997 Manual*, showing correspondence between 1997 NAICS and 1987 SIC, is also available. The 2002 and 1997 versions of NAICS are available on CD-ROMs, which can be ordered at NTIS. See http://www.census.gov/epcd/www/naics.html which lists NAICS codes and definitions for each industry.

4. List the types of products, giving the common or brand name and the proper or scientific name. Enter from your records the average and maximum amounts produced daily for each operation for the previous calendar year, and the estimated total daily production for this calendar year. Be sure to specify the daily units of production. Attach additional pages as necessary.

5. Provide the facility's long-term average production value for the past 5 years.

SECTION C – INSTRUCTION (WATER SUPPLY)

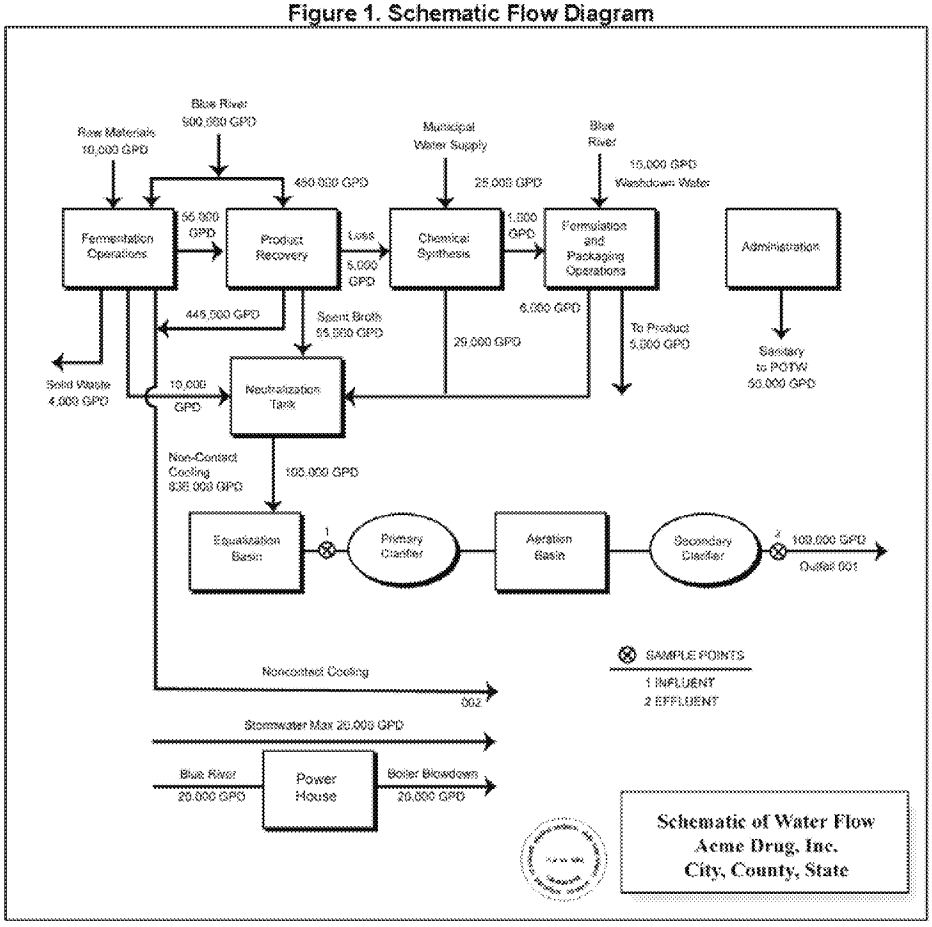
4. Provide daily average water usage within the facility. Contact cooling water is cooling water that during the process comes into contact with process materials, thereby becoming contaminated. Non-contact cooling water does not come into contact with process materials. Sanitary water includes only water used in restrooms. Plant and equipment washdown includes floor washdown. If sanitary flow is not metered, provide an estimate based on 15 gallons per day (gpd) for each employee.

SECTION E – INSTRUCTION (WASTEWATER DISCHARGE INFORMATION)

1. If you answer "no" to this question, skip to Section I, otherwise complete the remainder of the application.

4. A schematic flow diagram is required to be completed and certified for accuracy by a State registered professional engineer. Assign a sequential reference number to each process starting with No. 1. An example of a drawing is shown below in Figure 1. To determine your average daily volume and maximum daily volume of wastewater flow, you may have to read water meters, sewer meters, or make estimates of volumes that are not directly measurable.

Figure 1. Schematic Flow Diagram



5. Users should report average daily and daily maximum wastewater flows from each process, operation, or activity present at the facility. Categorical users should report average daily and maximum daily wastewater flows from every regulated, unregulated, and dilution process. A regulated wastestream is defined as wastewater from an industrial process that is regulated for a particular pollutant by a categorical pretreatment standard. Unregulated wastestreams are wastestreams from an industrial process that are not regulated by a categorical pretreatment standard and are not defined as a dilution wastestream. Dilution wastestreams include sanitary wastewater, boiler blowdown, noncontact cooling water or blowdown, stormwater streams, demineralized backwash streams and process wastestreams from certain industrial subcategories exempted by EPA from categorical pretreatment standards. [For further details see 40 CFR 403.6 (e).]

6. Users should report the average daily and daily maximum wastewater flows for each nonprocess wastewater flows. Nonprocess wastewater flows include, but are not limited to, cooling tower blowdown and boiler blowdown.

12. ***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]***

    The facility should indicate whether or not it anticipates requesting for equivalent mass limits.

13. ***[Note: This question might not be applicable to all pretreatment programs. The following question is only applicable to those programs implementing this optional streamlining provision.]***

    If the facility is subject to 40 CFR Parts 414, 419, or 455, it should indicate whether or not it anticipates requesting for equivalent concentration limits.

SECTION F – INSTRUCTION (CHARACTERISTICS OF DISCHARGE)

Provide the results of sampling and analysis identifying the nature and concentration (or mass, if required) or regulated pollutants in the discharge from each regulated process. Both daily maximum and average concentration values (or mass, if required) must be reported. The sample must be representative of daily operations.

If the User is subject to categorical effluent limits, the user must take a minimum of one representative sample to compile the necessary data. Samples should be taken immediately downstream from pretreatment facilities if such exists or immediately downstream from the regulated process if no pretreatment exists. If other wastewaters are mixed with the regulated wastewater prior to pretreatment, the user should measure the flows and concentrations. Sampling and analysis must be performed in accordance with the techniques prescribed in 40 CFR part 136 and amendments thereto. Furthermore, the date and place, and the methods of analysis must be submitted with the application.

Historical data may be used if the data provides sufficient information to determine the need for industrial pretreatment measures.

SECTION H – INSTRUCTION (FACILITY OPERATIONAL CHARACTERISTICS)

2. Indicate whether the business activity is continuous throughout the year or if it is seasonal. If the activity is seasonal, circle the months of the year during which the discharge occurs. Make any comments you feel are required to describe the variation in operation of your business activity.

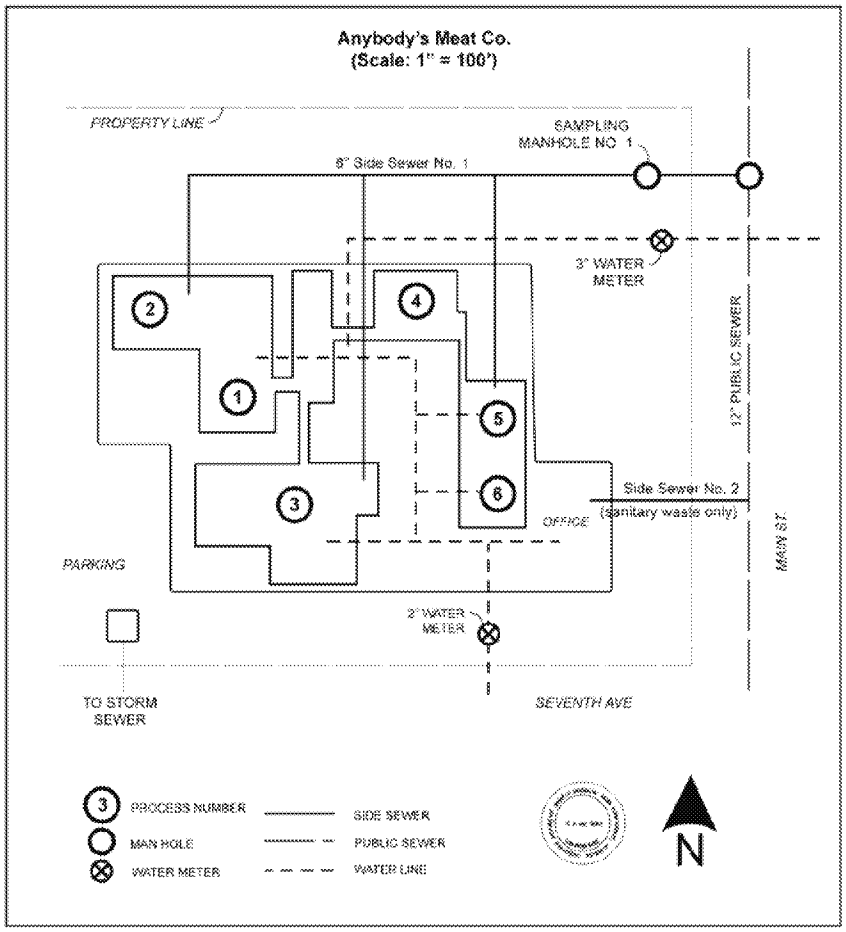
4. Indicate any shut downs in operation which may occur during the year and indicate the reasons for shutdown.

5. Provide a listing of all primary raw materials used (or planned) in the facility's operations. Indicate amount of raw material used in daily units.

6. Provide a listing of all chemicals used (or planned) in the facility's operations. Indicate the amount use of planned in daily units. Avoid the use of trade names of chemicals. If trade names are used, also provide chemical compounds. Provide copies of all available material safety data sheets for all chemical identified.

7. A building layout or plant site plan of the premises is required to be completed and certified for accuracy by a State registered professional engineer. Approved building plans may be submitted. An arrow showing North as well as the map scale must be shown. The location of each existing and proposed sampling location and facility sewer line must be clearly identified as well as all sanitary and wastewater drainage plumbing. Number each unit process discharging wastewater to the public sewer. Use the same number system shown in Figure 2, the schematic flow diagram. An example of the drawing required is shown below.

Figure 2. Building Layout



SECTION I – INSTRUCTION (SPILL PREVENTION)

5. Describe how the spill occurred, what was spilled, when the spill happened, where it occurred, how much was spilled, and whether or not the spill reached the sewer. Also explain what measures have been taken to prevent a reoccurrence or what measures have been taken to limit damage if another spill occurs.

SECTION J – INSTRUCTIONS (NON-DISCHARGED WASTES)

1. For wastes not discharged to the Control Authority's sewer, indicate types of waste generated, amount generated, the way in which the waste is disposed (e.g., incinerated, hauled, etc.), and the location of disposal.

2. Onsite disposal system could be a septic system, lagoon, holding pond (evaporative-type), etc.

5. Types of permits could be: air, hazardous waste, underground injection, solid waste, NPDES (for discharges to surface water), etc.

SECTION K – INSTRUCTIONS (AUTHORIZED SIGNATURES)

See instructions for question 4 in Section A, for a definition of an authorized representative.

Attachment 3

SIU Effluent Violations Table

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CINTAS				
Date	Parameter	Result	Limit	Unit
11/9/2011	BOD	**666**	600	mg/L
11/9/2011	TDS	**2,170**	1,200	mg/L
10/6/2011	TDS	**2156**	1200	mg/L
3/25/2011	BOD	**646**	600	mg/L
3/25/2011	TDS	**2390**	1200	mg/L
3/23/2010	TDS	**1510**	1200	mg/L

Pipe Maintenance Services, Inc.				
Date	Parameter	Result	Limit	Unit
2/9/2010	BOD	**3,800**	200	mg/L
2/9/2010	TDS	**4,700**	1200	mg/L
8/10/2010	Cu	**3.49**	3.36	mg/L
11/3/2010	BOD	**7,820**	200	mg/L
11/3/2010	TDS	**2,920**	1,200	mg/L
11/3/2010	TSS	**8,880**	200	mg/L
3/1/2011	BOD	**17,000**	200	mg/L
3/1/2011	TDS	**2,956**	1,200	mg/L
3/1/2011	TSS	**17,000**	200	mg/L

Darling International				
Date	Parameter	Result	Limit	Unit
3/30/2010	BOD	**3,120**	200	mg/L
3/30/2010	TDS	**4,650**	1200	mg/L
3/30/2010	TSS	**230**	200	mg/L
9/3/2010	BOD	**2085**	200	mg/L
9/3/2010	TDS	**3750**	1,200	mg/L
11/3/2010	BOD	**2,124**	200	mg/L
11/3/2010	TDS	**4,170**	1,200	mg/L
11/3/2010	TSS	**540**	200	mg/L
11/3/2010	HEM-Polar	**388**	300	mg/L
9/8/2011	BOD	**2,480**	200	mg/L
9/8/2011	TDS	**2,450**	1,200	mg/L

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9/8/2011	TSS	**324**	200	mg/L
12/1/2011	BOD	**1,656**	200	mg/L
12/1/2011	TDS	**2,933**	1,200	mg/L
12/1/2011	TSS	**223**	200	mg/L
12/1/2011	HEM-Polar	**339**	300	mg/L
11/7/2013	BOD	**4,780**	200	mg/L
11/7/2013	TDS	**4,865**	1,200	mg/L
11/7/2013	TSS	**490**	200	mg/L

Sunshine Fresh				
Date	Parameter	Result	Limit	Unit
6/10/2010	BOD	**2,639**	200	mg/L
6/10/2010	TDS	**2,028**	1200	mg/L
6/10/2010	BOD	**4,560**	200	mg/L
6/10/2010	TDS	**2,632**	1200	mg/L
6/10/2010	TSS	**320**	200	mg/L
6/10/2010	pH	**4.9**	5 to 11	SU
6/16/2011	BOD	**250**	200	mg/L
6/16/2011	TDS	**3,972**	1200	mg/L
6/16/2011	BOD	**1,900**	200	mg/L
6/16/2011	TDS	**4,824**	1200	mg/L
6/16/2011	pH	**4.2**	5 to 11	SU
11/9/2011	BOD	**1,255**	200	mg/L
11/9/2011	TDS	**2,620**	1200	mg/L

Blue Beacon Truck Wash				
Date	Parameter	Result	Limit	Unit
1/8/2010	Phosphorus	**103**	14	mg/L
1/8/2010	TDS	**2,820**	1200	mg/L
7/16/2010	Phosphorus	**34.5**	14	mg/L
7/16/2010	TDS	**1320**	1200	mg/L
10/14/2010	Phosphorus	**103**	14	mg/L
10/14/2010	TDS	**1,395**	1,200	mg/L
7/8/2011	Phosphorus	**37.5**	14	mg/L
7/8/2011	TDS	**1,616**	1,200	mg/L

1/13/2012	Phosphorus	**70.7**	14	mg/L
1/13/2012	TDS	**2,580**	1,200	mg/L
1/13/2012	TSS	**965**	750	mg/L
1/13/2012	Cadmium	**0.26**	0.15	mg/L
1/13/2012	Copper	**2.63**	0.6	mg/L
1/13/2012	Lead	**0.44**	0.2	mg/L
1/14/2013	TDS	**4,545**	1,200	mg/L
7/23/2014	TDS	**1,650**	1,200	mg/L
1/21/2014	TDS	**3,295**	1,200	mg/L
7/10/2014	Phosphorus	**131**	14	mg/L
7/10/2014	TDS	**1,528**	1200	mg/L

Thermofluids, Inc.				
Date	Parameter	Result	Limit	Unit
7/7/2010	BOD	**2,000**	600	mg/L
7/19/2011	BOD	**3,700**	600	mg/L
7/19/2011	TDS	**3,090**	1200	mg/L
7/16/2013	TDS	**1,664**	1200	mg/L
1/14/2014	BOD	**1,100**	600	mg/L
1/14/2014	Phosphorus	**170**	14	mg/L
1/14/2014	TDS	**2,438**	1200	mg/L
7/15/2014	TDS	**1,632**	1200	mg/L

Republic Services of Southern Nevada				
Date	Parameter	Result	Limit	Unit
4/8/2013	BOD	**1,900**	600	mg/L
4/8/2013	Phosphorus	**31**	14	mg/L
4/8/2013	TDS	**5,712**	1200	mg/L
10/7/2013	TDS	**4,160**	1200	mg/L
10/31/2013	Ammonia	**109**	61	mg/L
10/31/2013	TDS	**2545**	1200	mg/L

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4/7/2014	BOD	**2,200**	600	mg/L
4/7/2014	Phosphorus	**26**	14	mg/L
4/7/2014	TDS	**3,884**	1200	mg/L