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March 31, 2015

United States Environmental Protection Agency
Attn: James Polek / ENF-3-1
Region IX – Pacific Southwest Region
78 Hawthorne Street
San Francisco, CA 94105-3901

Re: Pretreatment Compliance Inspection Response by City of North Las Vegas

Dear Mr. Polek:

The following is the City of North Las Vegas Water Reclamation Facility response to requirements and recommendations brought forth from the Pretreatment Compliance Inspection conducted on September 29-30, 2015 at the City of North Las Vegas:

Requirements

1. **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). *(PCI Report 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).***

City's Response

The City of North Las Vegas agrees with the EPA Inspection Team. The City shall continue to determine through business license application, building department review, and Pretreatment Industrial Inspection Survey, the following:

A. City Business License Department will forward all applications for review to determine Pretreatment permit requirements.
B. Pretreatment staff will reviews nonresidential tenant improvement plans and new construction building plans submitted to the City. The City also conducts Task Force Meetings and Planning and Development Reviews in which Pretreatment Staff takes part, this allows Pretreatment staff to review all nondomestic projects through the Building Department prior to construction permits being issued for all potential future Significant Industrial Users, IU's, as well as Food Service Establishments in the City's service area.
C. Pretreatment staff shall inspect the City's service area and issue permits to all Class I (SIU), Class II (IU) facilities, and Food Service Establishments (FSE's) that require a permit after the revised Sewer Use Ordinance (SUO) is approved, as required.

2. **FSE's are permitted by the City under what City representatives referred to as Grease Interceptor permits. Chapter 13.24.080 of the City of 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). (PCI Report Section 2.2.6, Performance Measures).***

City's Response

The City of North Las Vegas agrees with the EPA Inspection Team. The City shall permit FSE's and inspect them at least annually to reduce Fats, Oils and Grease (FOG) in the collection system which should help reduce sewer overflows. The City shall modify the new SUO to ensure that it has the legal authority, and also modify the new ERP to implement consistence enforcement procedures for noncompliance.

3. **It should be noted that the City's SUO was not updated upon completion of the City's Water Reclamation Facility (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).** ***(PCI Report Section 4, Local Limits).***

City's Response

The City of North Las Vegas agrees with The EPA Inspection Team. The City has completed the sampling and received the analytical reports from the laboratory that are necessary to technically evaluate the local limits. The sampling was completed in December 2014 and the analytical reports are being reviewed at the time of this report. The City shall complete the local limits requirements 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.** ***(PCI Report Section 6, Legal Authority).***

City's Response

The City of North Las Vegas agrees with the EPA Inspection Team. The City shall identify the City of North Las Vegas WRF as the "Treatment Facility" in new Sewer Use Ordinance Chapter 13.28, and Sewer Collection System Chapter 13.24 and all other required legal documents.

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.** ***(PCI Report Section 6.1, Streamlining Provisions).***

City's Response

The City of North Las Vegas agrees with the EPA Inspection Team. The City shall include the required Streamlining Provisions or Rule in accordance with 40 CFR Part 403 into the City's new SUO.

6. **Due to the number of expired (and thus invalid) permits issued to SIU's within the City's service area, the City is REQUIRED to ensure that it issues effective permits to the SIU's in order to control the contributions to the POTW by each SIU in accordance with the federal regulations at 40 CFR.8(f)(1)(iii).** ***(PCI Report Section7, Control Mechanisms).***

City's Response

Upon discovering that most if not all SIU permits had expired, the City gathered updated contact information from the SIU's and issued updated permits. These permits are effective for the short term and do identify the City of North Las Vegas as the treatment facility. The permits shall again be updated after completion, approval and implementation of the City's new SUO. **All required changes as well as recommendations shall be incorporated into the new permits at that time to include Slug Discharge language, Notifying the City of Significant Change in Discharge, and identifying sample locations for consistency.**

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 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(i) of the federal regulations.** ***(PCI Report Section 7.1, Notification of Significant changes in Discharge).***

City's Response

The City of North Las Vegas agrees with the EPA Inspection Team. The City shall ensure that the language in its Class I and Class II permits includes the requirement for the permittee to notify the City in the event of a 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).** ***(PCI Report Section 8, Application of Pretreatment Standards and Requirements).***

City's Response

The City of North Las Vegas agrees with the EPA Inspection Team. The City shall develop and seek approval for a pretreatment program in accordance with 40 CFR 403.8(a).

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).** ***(PCI Report Section 9.1 Compliance Sampling).***

City's Response

The City of North Las Vegas agrees with the EPA Inspection Team. The City shall ensure that each SIU is sampled at least once each year in accordance with 40 CFR 403.8(f)(2)(v).

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)** ***(PCI Report Section 9.1 Compliance Sampling).***

City's Response

The City of North Las Vegas agrees with the EPA Inspection Team. The City has already implemented new procedures for the proper filing and storage of all Class I, II, FSE and Stormwater data base files and Class I Industrial User File(s) for a minimum of three years.

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 or required actions and additional comments. Apart from this one inspection form, City representatives were unable to produce inspection records for the 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's are inspected at least once each year, and that those inspections are adequately documented, as stated at 40 CFR 403.8(f)(2)(v).** ***(PCI Report Section 9.2, Compliance Inspection).***

City's Response

The City's Pretreatment group has finalized a new Class I Industrial (SIU) Inspection form to ensure adequate documentation of each inspection. A final report shall be written and mailed to the SIU. The Inspection form, final report and photos shall be stored in the data base files as well as the Class I Industrial User File(s) *(Attached is the City's Inspection form).*

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 to 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)** ***(PCI Report Section 9.3, Nondomestic Discharge Site Inspections Conducted during the inspection).***

City's Response

The City of North Las Vegas agrees with the EPA Inspection Team. The City issued CINTAS a new permit on November 1, 2014.

The City's Pretreatment staff has updated all Class I permits as of this date. These permits are effective for the short term but reference the existing 13.28, 13.24 and the ERP as they are. The permits will be updated after completion, approval and implementation of the City's updated SUO (13.28), SCS (13.24) and ERP (14.1). **All required changes shall be implemented at this time.**

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

City's Response

The City agrees with the EPA Inspection Team. The City shall ensure that all containers have appropriate, adequate spill containment as required.

14. **Due to the uncontained flocculent 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 Slug Discharge Control Plan (SDCP) in accordance with the federal regulations at 40 CFR 403.8(f)(2)(vi)** ***(PCI Report Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection and Section 9.6, Slug Discharge Control Plan).***

City's Response

The City agrees with the EPA Inspection Team. The City's Pretreatment staff shall ensure that CINTAS Corporation submit a SDCP and moves the containers to prevent the discharge of process chemicals to the sewer collection system, furthermore the City shall update industrial wastewater control permits to include the streamlining rule for Slug Control mechanisms.

15. **Due to the lack of Standard Operating Procedures (SOP's), 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 appears 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 facilities permit.** ***(PCI Report Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection).***

City's Response

The City agrees with the EPA Inspection Team. The City's Pretreatment staff shall ensure that Pipe Maintenance Service Inc., operates and maintains its process equipment through permits, inspections, self-monitoring reports and City sampling events.

16. **From the observation noted during the Pipe Maintenance Service 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 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 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 Pipe Maintenance Inc., facility does not increase the use of potable water or in other way attempt to use dilution as a method of treatment for its process 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. ***(PCI Report Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection).***

City's Response

The City agrees with the EPA Inspection Team. The City's Pretreatment staff shall ensure that no industrial discharger uses water or in any other way attempt to use dilution as a method to achieve compliance with the discharge standards. At this time dilution of a waste stream is covered in the current NLVMC §13.28.085, §13.28.120 as an "unlawful" discharge and is identified as an unauthorized discharge at §13.24.080 B.2.k. This language shall be clarified at the time the City adopts its updated ordinance.

17. **The chemical storage area in the Pipe Maintenance Service 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 to by gravity directly to the City's sewer system. The City is REQUIRED to ensure that Pipe Maintenance Service Inc., facility store the chemicals in the boiler room inside secondary containment in accordance with Part II, Item L, of the permit.** ***(PCI Report Section 9.3, Nondomestic Discharger Site Inspection Conducted during the Inspection).***

City's Response

The City agrees with the EPA Inspection Team. The City Pretreatment staff shall ensure that all required chemicals shall be properly stored in secondary spill containment as required to prevent discharge to the City's sewer or stormwater collection system(s).

18. **The EPA Inspection team was unable to confirm if the Pipe Maintenance Service 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 the sewer connection, the City is REQUIRED to evaluate the need for the Pipe Maintenance Service Inc., facility to develop a SDCP in accordance with the federal regulations at 40 CFR 403.8(f)(2)(vi).** ***(PCI Report Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection and Section 9.6, Slug Discharge Control Plans).***

City's Response

The City agrees with the EPA Inspection Team. The City shall evaluate all industrial facilities in the service area to determine where SDCP should be required. All SIU's will be done as a first priority for this requirement then the Cass II facilities will be done next.

19. **According to the information provided by the Thermofluids Inc., facility representative, wastewater with a 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. ***(PCI Report Section 9.3, Nondomestic Discharger Site Inspection Conducted during the Inspection).***

City's Response

The City agrees with the EPA Inspection Team. The City shall ensure that all IU's do not discharge prohibited waters to the sanitary sewer in accordance with the SUO.

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 operation at the Thermofluids Inc., facility and assess the facility's potential classification as a CIU. ***(PCI Report Section 9.3 Nondomestic Discharger Site Inspection Conducted during the Inspection).***

City's Response

Since the PCI Inspection Team visited Thermofluids Inc., facility, Thermofluids Inc., shall discontinue processing/treating wastewater collected from off-site. To clarify the process at the facility, Thermofluids trucks pump sand/oil interceptors at various types of establishments such as carwashes, automotive repair/service etc., and transfer to settling tanks at an off-site facility. The wastewater near the top of the tanks would then be trucked to the Arcata facility for treatment and the solids would be taken to Las Vegas paving facility for "burning". The City has determined more controls need to be in place for this process to continue and notified Thermofluids Inc. Thermofluids has decided to no longer process this wastestream at this facility and truck it off-site for treatment or disposal. The City shall continue to monitor the facility and continue to permit as a Class I facility for the Glycol Process. The Glycol recycle process at this time does not discharge wastewater to the City sewer. **Conclusion:** Thermofluids Inc., facility on Arcata shall have its discharge sealed to prevent process wastewater discharge to the sewer system and waste disposal records will be reviewed at each inspection and documented by City Inspectors.

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). ***(PCI Report Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection).***

City's Response

The City has issued all SIU's in its service area updated wastewater control permits by the time of this report. The City has met with and discussed the permit(s) contents with some of the permittees but not all at the time of this report. The City shall continue to meet with Industry representatives of the SIU's to ensure all requirements of the permits, and regulations are fully understood.

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). ***(PCI Report Section 9.4, Requesting, Receiving and Analyzing Reports).***

City's Response

The City Pretreatment staff has, since the EPA Inspection, sampled, analyzed reports, documented in both the electronic data base and the Class I files all sampling reports. The City Pretreatment staff shall submit quarterly and annual reports as required by 403.8.

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 regulations as stated at 40 CFR 403.8(f)(1)(iii).** ***(PCI Report Section 9.5, SIU Permit Application).***

City's Response

The City Pretreatment staff had been reviewing its permitting process and had discovered at the time of the PCI Inspection, most if not all Class I Permits had expired. All Class I permits have been written and issued to all Class I (SIU) facilities, However, in light of this report some additional requirements need to be added to the permits as stated. The City shall update all Class I permits at the time the updated SUO is adopted.

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

City's Response

The City agrees with the EPA Inspection Team. The City shall evaluate each SIU to determine if a SDCP is required in accordance with 40 CFR 403.8.

25. **Upon format request for the City's Enforcement Response Plan (ERP), City representatives stated 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 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.** ***(PCI Report Section 10, Enforcement).***

City's Response

The City agrees with the EPA Inspection Team. The City shall update its Enforcement Response Plan and reference current Municipal Code. As stated previously, the City will implement the updated SUO and ERP when they are approved and adopted.

26. The EPA Inspection Team identified a number of violations in both self-monitoring sampling data and compliance sampling that had been reviewed by the previous pretreatment 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). ***(PCI Report Section 10, Enforcement).***

City's Response

The City agrees with the EPA Inspection team. The City shall update its Enforcement Response Plan and implement consistently upon its approval and adoption. The City will verify that all enforcement documentation is stored in the appreciate Class I Industrial User's basefiles.

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 federal regulations at 40 CFR 403.8(f)(3). ***(PCI Report Section 11, Adequacy of Pretreatment Resources).***

City's Response

The City agrees with the EPA Inspection Team. The City's Pretreatment staff shall inventory the Industrial population within the City's service area and permit that are required to be permitted.

The City shall update its SUO, SCS and ERP and implement the Pretreatment Program in accordance with 40 CFR 403.

The City's Pretreatment staff have been working to improve the existing data file system to ensure all documentation is stored in electronic format as well in paper files as required.

The inspectors have completed one half of the annual sampling for 2015 and have already sent enforcement documents to those SIU's in noncompliance and the remaining half shall be sampled and documented by July.

The City's Pretreatment staff has realigned all SIU's annual, semi-annual sampling and reporting to the beginning of the reporting quarter to allow for a longer resampling period.

As stated in previous sections, the Pretreatment staff has issued all SIU's updated permits. Some changes to the permits include reduced sampling for the SIU's semi-annual to only those parameters that could be detected in the wastewater discharge. Sometime during the permit all parameters shall be sampled by the City.

All 13 required EPA Streamlining Rule Changes shall be implemented into the updated SUO, SCS, ERP, SIU and IU permits as applicable in accordance with 40 CFR 403.

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 priority to identify which entity is responsible for regulating the industries within the City that discharge to Clark County.** ***(PCI Report Section 2.1.1, Contributing Jurisdictions and Other Entities and section5, Nondomestic Discharger Characterization).***

   The City shall update the Multijurisdictional Agreement with Clark County to not only address the Nellis Industrial Park but to also include all IU's within the boundaries of North Las Vegas whose wastewaters is treated by Clark County. The City shall utilize the EPA Multijurisdictional Pretreatment Programs Guidance Manual to develop the multijurisdictional agreement with Clark County to establish the City's regulating authority for the above mentioned areas.

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

   City's Response

   The City will continue to develop its program and cooperate with the other entities, pretreatment groups and Clark County Health District to coordinate our efforts to comply with the Take-Back Program.

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.**

   City's Response

   City Pretreatment staff shall continue to permit, inspect and monitor as required dental facilities to ensure mercury levels remain below permissible limits

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 (8) facilities participated in the SDSI program or made any voluntary efforts to reduce the use of NPE's in their own operations. It is recommended that the City discuss and review the EPA's SDSI program with the industrial laundries in its service area.** ***(PCI Report Section 2.2.5, Industrial Laundries).***

City's Response

The Safe Detergent Stewardship Initiative (SDSI) questionnaire has been added to the Class I Industrial Inspection form. All Class I laundry facilities shall be informed of the voluntary participation. By it being part of the inspection form, the City will be able to track participation.

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

City's Response

The City anticipates participating in outreach programs to help the public better understand the effects of FOG on the City's collection and treatment systems. In most cases the City's SSO's might have been attributed to "trouble spots" in the collection system. These areas have been identified and are on a regular maintenance schedule. Residential areas of high density population can be addressed by conducting outreach exhibits at elementary schools and at events such as Earth Day and National Night Out.

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 material on the proper disposal of nonwoven disposable products to protect the collection system and the POTW as a whole.** ***(PCI Report Section 2.2.8, Nonwoven Disposable Products).***

City's Response

The City anticipates participating in outreach programs to help the public better understand the effects of Nonwoven disposable products on the City's collection and treatment systems. The City can best bring this issue to the public's awareness at outreach exhibits such as elementary schools and at Earth Day and National Night Out events.

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 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.** ***(PCI Report Section 6, Legal Authority).***

City's Response

The City, when updating the ERP shall only site SNC violations in accordance with 40 CFR 403. The City may choose to include language in the SUO and ERP to address refusal of City personnel but it will not be a SNC criteria.

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.** ***(PCI Report Section 7.2, Sampling Location).***

City's Response

The City agrees with the EPA Inspection Team. The Pretreatment staff shall incorporate the recommended changes. Sample locations shall be clearly identified in the SIU permits.

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.** ***(PCI Report Section 9.2, Compliance Inspections).***

City's Response

The City agrees with the EPA Inspection Team and has evaluated and changed the SIU Inspection form. *(Copy attached with this Response Report).*

10. **It is recommended that the City conduct a follow-up 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.** ***(PCI Report Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection).***

City's Response

The City agrees with the EPA Inspection Team and shall conduct a follow-up inspection at CINTAS Corporation to determine if continuous pH monitoring is required at this facility.

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

City's Response

The City agrees with the EPA Inspection Team and shall ensure not only the Pretreatment Inspectors become familiar with the above sited CINTAS Corp., but will inspect, and become as familiar as necessary with all the SIU facility's in the City's services area to accurately document activities in accordance with 40 CFR 403 and the City's Updated Municipal Code.

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 a direct vicinity of the facility's discharge/sample sump.** ***(PCI Report Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection).***

City's Response

The City agrees with the EPA Inspection Team. The City shall conduct a follow-up inspection at not only CINTAS Corporation but at all SIU facility's to ensure that storage of chemicals is in accordance with 40 CFR 403 and to prevent/reduce the possibility of discharge to the City's collection system.

13. **The facility representatives (at G&K) 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.** ***(PCI Report Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection).***

City's Response

The City agrees with the EPA Inspection Team and shall complete a follow-up inspection of G&K Services.

14. **It is strongly recommended that the City conduct a follow-up inspection 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.** ***(PCI Report Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection).***

City's Response

The City agrees with the EPA Inspection Team and shall follow-up with Pipe Maintenance Services Inc. to ensure the City has all required information to properly determine compliance with applicable codes and regulations.

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

City's Response

The City agrees with the EPA Inspection Team and shall ensure that all SIU facilities in the City's services area store chemicals in a manner to reduce/prevent the occurrence of a slug-like discharge to the City's sanitary sewer.

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

City's Response

The City agrees with the EPA Inspection Team and shall conduct a follow-up inspection at Thermofluids Inc. to ensure that secondary spill containment is adequate and that drains are protected to prevent accidental discharge of chemicals to the sewer collection system.

17. **It is strongly recommended that the City conduct a follow-up 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.** ***(PCI Report Section 9.3, Nondomestic Discharger Site Inspections Conducted during the Inspection).***

City's Response

The City agrees with the EPA Inspection Team and shall ensure that all areas are inspected during annual inspections to ensure that spill containment is adequate and that floor drains are protected from accidental spills to the City's sewer collection system.

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

City's Response

The City agrees with the EPA Inspection Team and shall utilize EPA's model permit application to obtain the necessary information for properly regulating these entities.

If you have questions about any response, please contact me at 702-633-1101.

Sincerely yours,

Dave N. Commons, Administrator
City of North Las Vegas
Water Reclamation Facility

cc: Joseph Maez, P.E., Nevada Division of Environmental Protection
Attachments