



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 21, 2008

In Reply Refer To: WTR-7

Greg Burns
Burns Machinery, Inc.
1132A Airport Road
Minden, Nevada 89423

Re: May 21, 2008 Clean Water Act Inspection

Dear Mr. Burns:

Enclosed is the July 18, 2008 report for our inspection of the Burns Machinery facility at the above address in Minden, Nevada. Please submit to EPA a short response letter to the Summary of Findings in Section 3.0 of this report by **September 15, 2008**. Your letter should include an individual response to each of the numbered findings in Section 3.0. Please send your letter to the attention of Anna Yen at EPA (and include the code "WTR-7" in the address above), with copies to Douglas County and Nevada Division of Environmental Protection.

The main findings are summarized below:

1. This facility is not subject to any federal categorical standards, nor is it a significant industrial user.
2. This facility discharges a small volume of non-domestic wastewater to the sewer system.
3. Douglas County should establish local limits and should issue the facility a permit to regulate oil and grease, pH, and any other pollutants of concern that the County identifies.

We would like to thank you for your helpfulness and courtesy during the inspection. We remain available to you and Douglas County to assist in any way. If you have any questions, please call Anna Yen at (415) 972-3976 or e-mail her at yen.anna@epa.gov.

Sincerely,
<Original
signed by>
Ken Greenberg
Chief, CWA Compliance Office

Enclosure

cc: Catherine Pool, Douglas County Community Development, enclosure by e-mail
Joe Maez, Nevada Division of Environmental Protection, enclosure by e-mail

**U.S. Environmental Protection Agency
Region 9
Clean Water Act Compliance Office**

NPDES Compliance Evaluation Inspection Report

Industrial User: Burns Machinery, Inc.
Industrial User Address: 1132A Airport Road, Minden, NV 89423
Inspection Date: May 21, 2008

EPA Region 9 Inspectors: Anna Yen, Environmental Engineer
Water Division, CWA Compliance Office

Douglas County Inspectors: Catherine Pool, Civil Engineer Senior
Douglas County Community Development

Facility Contact During Inspection: Greg Burns, President

Report Prepared by Anna Yen on July 18, 2008.

1.0 Scope and Purpose

The State of Nevada (“the State”) does not have delegation of the CWA authority regarding pretreatment. The local publicly owned treatment works (POTW), the Douglas County North Valley Wastewater Treatment Plant, does not discharge to surface waters. The receiving water body is groundwater via percolation from reuse irrigation. Therefore, the State’s Nevada Division of Environmental Protection (NDEP) has issued a groundwater permit and not an NPDES permit to the treatment plant.

Without an NPDES permit, the POTW does not have pretreatment requirements, and the municipality, Douglas County Community Development (“Douglas County” or “the County”), does not have a pretreatment program.* In effect, the discharge of industrial facilities is unregulated at the state and local levels. EPA provides pretreatment regulation of these facilities at the federal level. The purpose of the inspection on May 21, 2008 was to determine the standards and requirements that do apply to these facilities and to ensure compliance with those standards and requirements.

* Douglas County has been working on establishing local limits for the past several years.

1.1 General and Process Description

Burns Machinery, Inc. (“Burns”) began operations at this facility in 2000. This facility manufactures primarily aluminum parts for a “lowering kit” for personal cars and motorcycle sprockets for race dirt bikes. The lowering kits allow car owners to install smaller wheels on their cars purely for cosmetic reasons.

The facility has nine employees. The facility purchases raw materials: aluminum, stainless steel, and carbon steel barstock. Metal machining is performed at this facility. Metalworking machines include two saws, four lathes, four CNC mills, and a grinding machine. Ninety percent of the machining performed at this facility is on aluminum.

For the sprockets, the facility purchases the steel parts already laser-cut. This facility performs grinding operations on the parts, then ships them out for chrome plating.

For the lowering kits, raw materials are aluminum barstock. Metalworking is performed to produce the parts for the lowering kits. The saws, lathes, CNC mills, and grinding machine all use the same coolant solution which serves both as a coolant and lubricant. The coolant is a soluble-oil coolant that is mixed with water in a 1:20 ratio. The coolant is circulated through each machine in a closed loop system. Each machine has its own tank for coolant (approximately 20 gallons), with a metal screen to filter out solid particles from the coolant and a pump to circulate the coolant. However, the screen is not fine enough to catch all particles, so approximately once per year, the facility cleans out the fine metal particles from the bottom of the coolant tanks.

The floor is cleaned by first dry sweeping, then mopping. The mop water is emptied into a sink, which drains to the local sewer system. The only other use of the sink is for handwashing. This is the only sink in the manufacturing area, and there are no floor drains in the manufacturing area. Outside of the manufacturing area, there are two bathrooms shared with the other tenant in the building.

Aluminum chips collected off of each machine as well as from floor sweepings are stored in two bins that are placed outside. The facility also has one bin for steel scraps and another bin for reject parts. These materials are hauled away by an outside company for offsite recycling or disposal.

The grinding machine is used only about two days per month. The grinding stone itself erodes with each use. The grinding stone particles are collected and hauled offsite.

1.2 Facility Wastewater Sources and Other Wastes

Burns generates non-domestic wastewater from floor cleaning only. Dirty mop water is poured down the sink which drains to the local sewer system.

The only solid wastes are metal scraps from the metal machining and grinding stone particles from the grinding machine. These solid parts are hauled offsite for recycling or disposal.

1.3 Facility Process Wastewater Treatment System

No treatment system.

1.4 Wastewater Discharge

This facility's non-domestic wastewater discharge to the sewer system consists of dirty mop water. Besides the cleaning solution, the mop water might contain oil from the coolant used in the metalworking machines and metals from any stray metal chips that are picked up. Because of the possibility of stray metal chips in the mop water, EPA suggests that the facility place some type of filter over the sink drain to catch the metal chips while disposing of the mop water down the sink drain.

This facility discharges a small volume of non-domestic wastewater to the sewer system. This wastewater discharges to the Douglas County North Valley Wastewater Treatment Plant. The treatment plant is owned and operated by Douglas County. The Douglas County North Valley Wastewater Treatment Plant is operated under a State groundwater permit (No. NEV60025).

2.0 Compliance with Federal Categorical Standards

This facility is not subject to any federal categorical standards (40 CFR 405 through 471). In particular, it is not subject to the metal finishing standard (40 CFR 433) since it does not perform any of the six core operations listed in the applicability paragraph of the standard. The six core operations listed in 40 CFR 433 are electroplating, electroless plating, chemical coating, chemical milling/etching, anodizing, and printed circuitboard manufacturing.

2.1 Compliance with Other Federal Pretreatment Requirements

This facility is not a significant industrial user (SIU) because it is not subject to a federal categorical standard. In addition, it discharges less than 25,000 gallons per day of process wastewater to the POTW. Its wastewater is primarily dirty mop water from floor cleaning. Though mop water has the potential to have high levels of contaminants, based on the fact that the volume of discharged wastewater is low and based on our observations during the inspection, EPA concludes for now that the facility has no reasonable potential for adversely affecting the POTW's operation or for violating Pretreatment Standards.

2.2 Compliance with Local Limits

Douglas County has not yet established any local limits. Douglas County should develop local limits to protect the POTW from adverse impacts and to help prevent violations of its State-issued permit.

Once the County has established local limits, it should issue the facility a permit to regulate oil and grease, pH, and any other pollutants of concern that the County identifies in the effluent. Since the County does not currently require the facility to perform routine monitoring, analysis, and reporting to demonstrate continued compliance, nor does the County perform monitoring and analysis itself, the facility does not have any sample points. The County should work with the facility to identify sample points.

3.0 Summary of Findings

1. This facility is not subject to any federal categorical standards.
2. This facility is not an SIU.
3. This facility discharges a small volume of non-domestic wastewater to the sewer system.
4. This facility has no floor drains and only one sink in the manufacturing area.
5. Douglas County should issue the facility a permit to regulate oil and grease, pH, and any other pollutants of concern that the County identifies in the effluent. Douglas County will need to establish local limits prior to issuing permits.