



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

July 21, 2008

In Reply Refer To: WTR-7

Gert von Marschner
Oxinal
2248 Meridian Blvd., Suite C
Minden, Nevada 89423

Re: May 20, 2008 Clean Water Act Inspection

Dear Mr. Von Marschner:

Enclosed is the July 18, 2008 report for our inspection of the Oxinal 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. The facility does not discharge any non-domestic wastewater to the sewer system.
3. Douglas County should issue a permit to the facility to restrict discharge to verify its current zero discharging practices.

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: Oxinal
Industrial User Address: 2248 Meridian Blvd, Suite C, Minden, NV 89423
Inspection Date: May 20, 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: Gert von Marschner, 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 November 27, 2007 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

Oxinal began operations at this facility in 2001. This facility performs aluminum wire anodizing, primarily for the electrical and electronics industries. The facility has only a few employees and usually operates about three days a week.

The facility purchases the raw materials: aluminum wire of various diameters. The facility performs the anodizing process, colors the wire with dye if the customer requests, and rolls the wire back onto spools. The facility also has the capability to make flatwire and smaller-diameter wire out of the original raw material. The entire manufacturing area does not have any floor drains.

The anodizing process is surrounded by a secondary containment curb. There are no floor drains in the containment area. Oxinal stated they have not had any spills. If a spill were to occur, the facility would vacuum the liquid out of the containment area. In general, the anodizing process consists of the following steps:

1. Preclean – soap solution
2. Electrolyte solution – acidic solution
3. Rinse – mild solution of nitric acid and deionized water
4. Secondary rinse – deionized water
5. Color – dye (optional)
6. Seal – proprietary solution consisting of 99% hot water

Liquids that are annually filtered are the water rinse, the nitric acid solution, and the dye. Each of these tanks has its own filter canister and pump. The liquid is circulated by pump from the tank through the filter and back into the tank.

The facility purchases dyes of many different colors in powder form. The powder dyes come in totes of 175 gallons or 100 gallons. If the facility needs to change the dye color, it pumps out the dye solution into an empty tote, makes up a different color dye solution in a different tote by adding water, and pumps the liquid into the color tank.

Of the other tanks, the facility sometimes has to add chemicals. But Oxinal stated that it does not have to perform a complete changeout of the liquid in any of the tanks.

The facility treats the municipal water in a deionization system before using it in its process. The facility does not do any regeneration onsite. It simply receives a new canister from Culligan on a periodic basis.

The manufacturing area has a sink and a safety eyewash station near the front entrance. Oxinal stated that the sink is used only for handwashing. The eyewash station has a floor drain which is contained so that any liquids on the manufacturing area floor would not be able to enter the eyewash station drain. The facility has a restroom outside of the manufacturing area.

1.2 Facility Wastewater Sources and Other Wastes

The facility does not generate any process-related wastewater. Solids wastes that are disposed of offsite are the filters used for the water rinse, nitric acid solution, and dye.

1.3 Facility Process Wastewater Treatment System

No treatment system.

1.4 Wastewater Discharge

This facility does not discharge non-domestic wastewater to the sewer system. Currently, the facility discharges only domestic wastewater, which travels through the sewer system 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

If this facility were to discharge any non-domestic wastewater to the local sewer system, this facility would be subject to the federal categorical standard for metal finishing (40 CFR 433). Its anodizing process would trigger applicability of this categorical standard.

An industrial user is subject to the federal categorical standard for metal finishing if it performs any of the following six core operations listed in 40 CFR 433: 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. The facility does not discharge any non-domestic wastewater to the sewer system; therefore, it 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.

The County should issue a permit to the facility to restrict discharge. This permit would be a means to verify that the facility follows its zero discharging practices on a continual basis.

3.0 Summary of Findings

1. This facility is not subject to any federal categorical standards.
2. This facility does not discharge any non-domestic wastewater to the sewer system.
3. This facility is not an SIU.
4. The facility's manufacturing area does not have any floor drains. The manufacturing area does have a sink and eyewash station near the entrance.
5. Douglas County should issue a permit to the facility to restrict discharge to verify its current zero discharging practices.