



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

July 21, 2008

In Reply Refer To: WTR-7

Steve Stevens
JRS, LLC
dba Steam Turbine Blading & Parts
2185 Park Place
Minden, Nevada 89423

Re: May 20, 2008 Clean Water Act Inspection

Dear Mr. Stevens:

Enclosed is the July 18, 2008 report for our inspection of the JRS 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: JRS, LLC
dba Steam Turbine Blading & Parts

Industrial User Address: 2185 Park Place, 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

State Inspector: Joe Maez, Staff III Engineer
Nevada Division of Environmental Protection, Bureau
of Water Pollution Control, Technical Services

**Facility Contact During
Inspection:** Michael Rose, Production Manager

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

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

20, 2008 was to determine the standards and requirements that do apply to these facilities and to ensure compliance with those standards and requirements.

1.1 General and Process Description

JRS, LLC, better known as Steam Turbine Blading & Parts, began operations at this facility in 2003. This facility manufactures different types of blades and associated parts for steam and gas turbines. With 20 to 25 employees, the facility usually operates 24 hours a day, 7 days a week. Depending on the demand for its products, the facility sometimes runs 10-hour shifts.

The facility purchases the raw materials: mostly stainless steel bars and some titanium bars of various dimensions. JRS performs metalworking on the bars, using saws, mills, lathes, and grinders to produce the finished products. The metalworking area does not have any floor drains.

Away from the metalworking area is a floor drain and two sinks. The facility stated that the sinks are used only for washing hands and for diluting the floor cleaner to mop the floor. Dirty mop water from floor cleaning is emptied into the floor drain. The dirty mop water contains the floor cleaner/degreaser and may contain a little coolant used in the machines that has dripped or spilled onto the floor.

The solution that is used in the milling machines as both a coolant and lubricant is actually 92% water mixed with 8% soluble-oil-based coolant. The coolant solution is sent to a machine onsite that cleans the coolant solution so that it can be reused. This “coolant recycler” skims oil off the surface and filters solids out. The cleaned-up coolant solution is reused in the machines. The waste oil is collected in 55-gallon drums which are then hauled away for offsite disposal.

Approximately once every five years, the coolant solution is completely replaced in the milling machines. The coolant solution is drained out of the milling machines and is picked up by an outside company for offsite disposal.

The metal shavings from the metalworking plus any coolant remaining on the metal shavings are collected and hauled away by Western Metals. The grinding operations creates grinding stone fine particles. These fine particles along with metal dust are collected with the metal shavings and, thus, are also hauled off by Western Metals.

1.2 Facility Wastewater Sources and Other Wastes

JRS generates non-domestic wastewater from the following sources:

- Floor cleaning
- Milling machines (spent coolant)

Wastewater from floor cleaning is emptied into a floor drain leading to the local sewer system. Spent coolant is periodically replaced with new coolant in the milling machines.

The facility's other liquid waste is waste oil. Both spent coolant and waste oil are sent offsite. Solid wastes include metal shavings and grinding stone particles which are also hauled offsite.

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. The floor cleaner is a degreaser that contains propylene glycol n-propyl ether. Small amounts of coolant were observed to be on the floor during the inspection. Coolant on the floor is a result of maintenance activities for and daily usage of the milling machines. The coolant is a chemical emulsion/soluble oil which is almost 50% petroleum oil. The mop water would likely contain these compounds and might contain small amounts of metal shavings.

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. The metalworking area itself does not have any floor drains.
5. The facility does have a floor drain and two sinks outside of the metalworking area.
6. 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.