



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

CERTIFIED MAIL 7000 0520 0025 3711 8492  
RETURN RECEIPT REQUESTED

September 27, 2006

In Reply Refer To: CWA-307-9-06-053

John Stevens, Plant Manager  
Bruce Industries  
101 Evans Avenue  
Dayton, Nevada 89403-1700

Dear Mr. Stevens:

This Administrative Order establishes interim requirements to be in effect until Lyon County can issue its own sewer discharge permit. The interim requirements include corrective actions to achieve consistent compliance with Federal standards and a self-monitoring schedule. In issuing this Order, EPA acknowledges that Bruce Industries has complied with the State and local sewer discharge requirements in effect to date. It is also our understanding that Bruce Industries first became aware of the applicable Federal sewer discharge requirements during our July 20 inspection, and that the initial findings regarding overall compliance were first made in our August 28 inspection report.

Specifically, the Order requires Bruce Industries to cease dilution as a substitute for treatment, to provide final pH adjustment, and to self-monitor for one year. These requirements are necessary because all past sampling is invalidated by dilution from the continuous operation of the overflow rinses. The key dates are as follows:

KEY DATES	ADMINISTRATIVE ORDER CWA-307-9-06-053
10/30/06	1. Submit a short response to the August 28 EPA inspection report.
12/28/06	2. Submit preliminary engineering plans for retrofitting to on-demand rinsing and BAT treatment of the rinses. 5. Submit preliminary engineering plans for final pH adjustment.
11/01/06	8-11. Begin one year of self-monitoring under this Order. Daily pH and discharge flow rate measurements. Monthly sampling for cyanide and common metals. Quarterly sampling for oil and grease and other metals. Twice per year sampling or self-certification for total toxic organics.
03/28/07	3. Retrofit to on-demand rinsing - Submit a notice of completion. 6. Begin either continuous monitoring (for pH and discharge flow rate) or once-per-day batch discharge - Submit a notice of completion.
06/28/07	4. Install treatment for rinses as necessary - Submit a notice of completion. 7. Install final pH adjustment - Submit a notice of completion.
10/31/07	End self-monitoring under this Order.
* * *	Self-monitoring reports are due on the 28th day of each month for the samples collected during the previous calendar month.

The enclosed Order and the findings that constitute the basis behind the Order are issued pursuant to Sections 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Clean Water Act ("the Act") as amended [33 U.S.C. Sections 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)]. Any violation of the terms of this Order or pretreatment standards could subject Bruce Industries to a civil action for appropriate relief pursuant to Section 309(b) of the Act [33 U.S.C. Section 1319(b)] and/or penalties under Section 309(d) of the Act [33 U.S.C. Section 1319(d)] of up to \$31,500 per day of violation. In addition, under Section 309(g) of the Act [33 U.S.C. Section 1319(g)], any violation of the pretreatment standards could also subject Bruce Industries to an administrative penalty action of up to \$12,000 per day of violation not to exceed \$157,500. Sections 309(c)(1), (c)(2) and (c)(4) of the Act [33 U.S.C. Section 1319(c)(1), (c)(2) and (c)(4)] also provide penalties for negligent violations, knowing violations and knowingly making false statements.

The request for information included in this Order is not subject to review by the Office of Management and Budget (OMB) under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. Sections 3502(4), 3502(11), 3507, 3512, and 3518. Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons [44 U.S.C. Section 3502(4), 3502(11) and 5 CFR Section 1320.5(a)].

EPA has promulgated regulations to protect the confidentiality of the business information it receives. These regulations are set forth in 40 CFR Part 2, Subpart B and in the Federal Register at 41 F.R. 36902 (September 1, 1976) and 43 F.R. 40000 (September 8, 1978). A claim of business confidentiality may be asserted in the manner specified by 40 CFR Section 2.203(b) for part or all of the information requested. EPA will disclose business information covered by such a claim only as authorized under 40 CFR Part 2, Subpart B. If no claim accompanies the business information at the time EPA receives it, EPA may make it available to the public without further notice. Bruce Industries may not withhold from EPA any information on the grounds that it is confidential.

If you have any questions regarding this matter, please contact Greg V. Arthur of my staff at (415) 972-3504 or at [arthur.greg@epa.gov](mailto:arthur.greg@epa.gov).

Sincerely,

*Original signed by:*

*Alexis Strauss*

Alexis Strauss  
Director, Water Division

Enclosure

cc: Skeet Sellers, Lyon County  
Joe Maez, Nevada Department of Environmental Protection

UNITED STATES  
ENVIRONMENTAL PROTECTION AGENCY  
REGION 9

In the Matter of	)	
	)	
Bruce Industries	)	FINDING OF VIOLATION
Dayton, Nevada	)	
	)	AND ORDER
Proceedings under Section 308(a) and 309(a)(3),	)	
(a)(4) and (a)(5)(A) of the Clean Water Act, as	)	Docket No. CWA-307-9-06-053
amended, 33 U.S.C. Section 1318(a) and	)	
1319(a)(3), (a)(4) and (a)(5)(A)	)	

**STATUTORY AUTHORITY**

The following Finding of Violation and Order (Docket No. CWA-307-9-06-053) is issued under the authority vested in the Administrator of the U.S. Environmental Protection Agency (EPA) pursuant to Sections 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Clean Water Act [33 U.S.C. Sections 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)] (hereinafter the Act). This authority has been delegated by the Administrator and the Regional Administrator of EPA Region 9 to the Director of the Water Division of EPA Region 9.

**FINDING OF VIOLATION**

The Director of the Water Division of EPA Region 9 finds that Bruce Industries in Dayton, Nevada is in violation of Section 307(d) of the Act [33 U.S.C. Section 1317(d)]. This Finding is made on the basis of the following facts:

1. Section 307(d) of the Act [33 U.S.C. Section 1317(d)] prohibits any owner or operator of any source from introducing pollutants into publicly owned treatment works (POTWs) in violation of any effluent standard or prohibition or pretreatment standard promulgated under Section 307 of the Act.
2. Under Section 307(b) of the Act [33 U.S.C. 1317(b)], EPA promulgated the following general pretreatment regulations and categorical pretreatment standards:
  - a. The Federal categorical pretreatment standards for metal finishing in 40 CFR 433

which require the new source metal finishers that perform electroplating, electroless plating, anodizing, chemical coating, or chemical etching, to comply with the standards for cadmium, chromium, copper, lead, nickel, silver, zinc, total or amenable cyanide, and total toxic organics, in 40 CFR 433.17;

- b. The national pretreatment requirements in 40 CFR 403.6(d) for categorical industrial dischargers into POTWs which prohibits any increase in the use of process water or any other attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with standards;
  - c. The national pretreatment standards in 40 CFR 403.12(e)(g) for all industrial dischargers into POTWs which require categorical industrial users to submit, at least twice per year, periodic reports of sampling that is representative of the discharge to the sewers and indicate both the concentration of the discharge for all Federally-regulated parameters and the flow rate of the discharge.
3. Bruce Industries is a corporation and therefore a person within the meaning of Section 502(5) of the Act, [33 U.S.C. Section 1362(5)]. Bruce Industries owns and operates an aircraft indoor lighting manufacturing business operating at 101 Evans Avenue in Dayton, Nevada. Bruce Industries is a non-domestic source and introduces pollutants within the meaning of Section 502(6) of the Act [33 U.S.C. Section 1362(6)], into the Lyon County domestic sewer system and the South Dayton Valley wastewater treatment plant, which together are a POTW within the meaning of Section 307(b) and the pretreatment regulations in 40 CFR 403.3(o). Bruce Industries is therefore subject to the provisions of the Act, [33 U.S.C. Section 1251 et seq., including Section 307, 33 U.S.C. Section 1317].
  4. On July 20, 2006, EPA, the Nevada Department of Environmental Protection (“NDEP”), and Lyon County conducted a compliance evaluation inspection of Bruce Industries, and determined the following:

- a. Facility Description: Bruce Industries owns and operates and aircraft indoor lighting fixtures manufacturing business in one building in Dayton:
  1. The operations on-site involve metals sawing, bead blasting, punch pressing, shearing, water-soluble oil cooled machining, non-contact cooled welding, vacuum forming of plastic, silk screening, vibratory deburring, chem-film metal finishing of aluminum, dry-booth painting, and assembly;
  2. The chem-film metal finishing line comprises alkaline cleaning, alkaline soap cleaning, nitric-acid deoxidation, dichromate conversion coating, clear chromate conversion coating, and nitric-acid passivation;
  3. The operations began in 1987;
- b. Wastewater Discharges to the Sewer: Bruce Industries discharges process-related wastewater into the Lyon County domestic sewers feeding into the South Dayton Valley wastewater treatment plant for discharge into the ground water through a rapid infiltration basin:
  1. The chem-film metal finishing line generates metal finishing spent solutions, spent static rinses, and overflow rinses;
  2. The operations also generate vibratory deburring tail water, and wash waters from three work sinks serving the chem-film line, painting equipment cleaning, and silk screening;
  3. The process-related wastewaters from Bruce Industries discharge through a final outside clarifier, the outlet of which is designated in this Order as the final compliance sample point, IWD-BR1;
  4. The process-related wastewaters that discharge through IWD-BR1 consist of untreated wastewaters mixed with treated spents from a small batch treatment unit (chromium reduction, metals precipitation, pH adjustment,

- flocculation, filter press removal of solids, and final cartridge filtration);
5. Overflowing chem-film rinses and work sink drainages discharge to the sewer through IWD-BR1 without treatment;
  6. Chromium-bearing static rinses and spent solutions from the chem-film chromium conversion coating tanks are batch treated through chromium reduction, metals precipitation, pH adjustment, flocculation, filter press removal of solids, and cartridge filtration;
  7. Non-chromium bearing static rinses and spent solutions from chem-film alkaline cleaning, soap cleaning, acid deoxidation, and acid passivation steps are batch treated through pH adjustment only;
  8. Bruce Industries reports that the flow rates of the combined treated and untreated process-related wastewater discharges through IWD-BR1 to the sewers average ~2,500 gpd;
  9. The discharges of process-related wastewater to the sewers are monitored at the outlet end of the outside final clarifier, designated in this Order and the August 28, 2006 EPA inspection report by compliance sample point IWD-BR1;
  10. EPA evaluated the 2004-2006 self-monitoring results for Bruce Industries at IWD-BR1 generated under the requirements of the NDEP Permit No. NEV87021 for discharge to the ground waters through the Lyon County sewers;
- c. Categorical Standards: The Federal categorical pretreatment standards in 40 CFR 433 for new source metal finishing operations apply to all process-related wastewater discharges from Bruce Industries since the operations in this facility began after August 31, 1982:
1. 40 CFR 433 Applicability: Because Bruce Industries performs the core

metal finishing operations of chemical coating (chem-film, passivation), and etching (deoxidation), the Federal categorical pretreatment standards in 40 CFR 433 apply to all process wastewaters from the core operations as well as from any other on-site operation, such as cleaning, deburring, painting, and machining, associated with metal finishing and specifically listed in 40 CFR 433.10(a);

2. Adjustments: The Federal categorical pretreatment standards in 40 CFR 433 must be adjusted in one way in order to be applied at Bruce Industries to the discharges through IWD-BR1 into the sewers:
  - i. The Federal cyanide standards in 40 CFR 433 for the discharges from new source metal finishers must be adjusted to account for dilution from non-cyanide bearing waste streams;
  - ii. Domestic sewage discharges into the Lyon County sewers downstream of IWD-BR1;
  
3. Federal Standards as Applied to Bruce Industries: The following Federal categorical pretreatment standards apply to the discharges from Bruce Industries at IWD-BR1:

Federal Categorical Standards (mg/l)	@ IWD-BR1	
	daily-max	monthly-avg
Cd cadmium	0.11	0.07
Cr chromium	2.77	1.71
Cu copper	3.38	2.07
Pb lead	0.69	0.43
Ni nickel	3.98	2.38
Ag silver	0.43	0.24
Zn zinc	2.61	1.48
CNa amenable cyanide	0.057	0.021
CNt total cyanide	0.080	0.043
TTO total toxic organics	2.13	-

5. Bruce Industries violated Section 307(d) of the Act [33 U.S.C. Section 1317(d)] in that Bruce Industries failed to comply with the Federal prohibition against dilution of the Federally-regulated waste streams as a substitute for treatment, in that:
- a. The following overflow rinses were observed by the EPA inspector during the July 20, 2006 inspection to be operating continuously without parts processing:
    - Chem-film Tank 2 alkaline cleaning - 1° overflow rinse
    - Chem-film Tank 4 soap cleaning - 1° overflow rinse
    - Chem-film Tank 6 nitric-acid deoxidation - 1° overflow rinse
  - b. The following static rinses and spent solutions were determined by the EPA inspector during the July 20, 2006 inspection to be intermittently discharged to the sewer after undergoing only batch pH adjustment:
    - Chem-film Tank 1 alkaline cleaning - spent solution
    - Chem-film Tank 3 soap cleaning - spent solution
    - Chem-film Tank 5 nitric-acid deoxidation - spent solution
    - Chem-film Tank 12 nitric-acid passivation - spent solution
    - Chem-film Tank 13 nitric-acid passivation - 1° static rinse
  - c. The following wastewaters were observed by the EPA inspector during the July 20, 2006 inspection to be discharged to the sewer without treatment:
    - Excess vibratory deburring tail waters
    - Chem-film related wash water from a work sink
    - Painting equipment clean-up wash water from a work sink
    - Silk screening related wash water from a work sink
  - d. All overflowing rinses, spent solutions, spent static rinses, tail waters, and wash waters identified in Findings 4(a), 4(b), and 4(c) above, discharge without treatment for metals. All overflowing rinses, tail waters, and wash waters identified in Findings 4(a), and 4(c) above, discharge without treatment for final pH. Untreated wastewaters account for an estimated 95% of the overall discharge to the sewers at IWD-BR1. There is no data available to calculate the percentage of pollutant loads discharged without treatment;

- e. As a result, the ~95% untreated metal finishing wastewaters are diluted by excess make-up rinse water, which renders the samples collected from Bruce Industries at IWD-BR1 unusable for the determination of compliance with the Federal categorical pretreatment standards;
  - f. NDEP Permit No. NEV87021 requires Bruce Industries to self-monitor at IWD-BR1 monthly (*chromium*), quarterly (*cadmium, copper, lead, nickel, zinc, pH, and oil & grease*), and annually (*silver, cyanide, and total toxic organics*). The 2004-2006 sample record indicates that Bruce Industries fully completed these requirements. The ~95% untreated metal finishing wastewaters, diluted by excess make-up rinse water, rendered all samples collected in 2004-2006 unusable for the determination of compliance with the Federal categorical pretreatment standards, resulting in at least 12 days of violation per year, for a total of 24 days of violation.
6. Bruce Industries violated Section 307(d) of the Act [33 U.S.C. Section 1317(d)] in that Bruce Industries failed to comply with the Federal self-monitoring requirements, in that:
    - a. The 2004-2006 sample record indicates that wastewater discharges from Bruce Industries through IWD-BR1 were self-monitored for silver, cyanide, and total toxic organics once per year;
    - b. The Federal regulation requires Bruce Industries to self-monitor at IWD-BR1 at least twice per year for all Federally-regulated pollutants. Bruce Industries completed the Federal minimum self-monitoring requirements for cadmium, chromium, copper, lead, nickel, and zinc, but not for silver, cyanide, or toxic organics, resulting in at least 3 days of violation per year, for a total of 6 days of violation.
  7. The August 28, 2006 EPA report of the July 20 inspection of Bruce Industries is by reference made part of this Order.

### **ADMINISTRATIVE ORDER**

Taking these Findings into consideration and considering the potential environmental and human health effects of the violations and all good faith efforts to comply, EPA has determined that compliance in accordance with the following requirements is reasonable. Pursuant to Section 308(a) and 309(a)(3), (a)(4) and (a)(5)(A) of the Act [33 U.S.C. Section 1318(a) and 1319(a)(3), (a)(4) and (a)(5)(A)], IT IS HEREBY ORDERED that Bruce Industries comply with the following requirements:

#### *Cease Dilution as a Substitute for Treatment*

1. By **OCTOBER 30, 2006**, Bruce Industries shall submit a short response to the findings in Sections 2 through 5 of the August 28, 2006 EPA inspection report.
2. By **DECEMBER 28, 2006**, Bruce Industries shall submit a preliminary engineering plan of the steps to be taken in order to cease dilution as a substitute for treatment as required in 40 CFR 403.6(d) through retrofitting to on-demand rinsing practices and/or the installation for all wastewaters of best-available-technology treatment as necessary. This preliminary engineering plan shall include:
  - a. A detailed description of all plant, equipment, hardware, management plans and operating procedures to be used to cease dilution as a substitute for treatment through retrofitting to on-demand rinsing practices;
  - b. A detailed description of all plant, equipment, hardware, management plans and operating procedures to be used to cease dilution as a substitute for treatment through the installation and operation of best-available-technology treatment or its equivalent;
  - c. A schedule of all corrective actions to be made in order to cease dilution as a substitute for treatment, not to extend beyond the deadlines specified in Items 3 and 4 of this Order.

3. By **MARCH 28, 2007**, Bruce Industries shall complete the steps necessary to cease dilution as a substitute for treatment through retrofitting to on-demand rinsing practices, and submit a notice of completion.
4. By **JUNE 28, 2007**, Bruce Industries shall complete the necessary steps to cease dilution as a substitute for treatment through the installation and operation of best-available-technology treatment or its equivalent, and submit a notice of completion.

*Final pH Adjustment and Monitoring*

5. By **DECEMBER 28, 2006**, Bruce Industries shall submit a preliminary engineering plan of the steps to be taken in order to provide final pH adjustment and either continuous monitoring (pH and discharge flow rate) or once-per-day batch discharge of all process-related wastewater discharges to the sewers. This preliminary engineering plan shall include:
  - a. A detailed description of all plant, equipment, hardware, management plans and operating procedures to be used to provide final pH adjustment of all process-related wastewater discharges to the sewers;
  - b. A description of all equipment and operating procedures to be used to provide either continuous monitoring (pH and discharge flow rate) or once-per-day batch discharge of all process-related wastewater discharges to the sewers;
  - c. A schedule of all corrective actions to be made to provide pH adjustment and either continuous monitoring (pH and discharge flow rate) or once-per-day batch discharge of all process-related waste-water discharges to the sewers, not to extend beyond the deadlines specified in Items 6 and 7 of this Order.
6. **MARCH 28, 2007**, Bruce Industries shall complete the steps necessary to provide either continuous monitoring (pH and discharge flow rate) or once-per-day batch discharge of all process-related wastewater discharges to the sewers, and submit notice of completion.

7. By **JUNE 28, 2007**, Bruce Industries shall complete the steps necessary to provide pH adjustment of all process-related wastewater discharges to the sewers, and submit a notice of completion.

*Self-Monitoring Schedules*

8. Sampling Schedule: For a year, from **NOVEMBER 1, 2006 THROUGH OCTOBER 31, 2007**, Bruce Industries shall self-monitor the process-related wastewater discharges at the designated compliance sampling point, IWD-BR1, or at any representative compliance point(s) established in the future with written EPA approval, in accordance with the following schedule:
  - a. **ONCE EVERY DAY**, Bruce Industries shall self-monitor the process-related wastewater discharges to the sewers for pH and discharge flow rate;
  - b. **ONCE EVERY MONTH**, Bruce Industries shall self-monitor all process-related wastewater discharges to the sewers for chromium, copper, lead, zinc, and amenable cyanide;
  - c. **ONCE EVERY QUARTER** (before December 28, 2006, March 28, 2007, June 28, 2007, and October 28, 2007), Bruce Industries shall self-monitor the process-related wastewater discharges to the sewers for oil and grease, cadmium, iron, nickel, and silver;
  - d. **ONCE EVERY SIX-MONTHS** (before March 28, 2007, and October 28, 2007), Bruce Industries shall self-monitor the process-related wastewater discharges to the sewers for total toxic organics and total cyanide;
  - e. **BEGINNING APRIL 1, 2007**, Bruce Industries shall continuously self-monitor the process-related wastewater discharges for pH and discharge flow rate, unless all process-related wastewaters are batch discharged once-per-day;

- f. **ONCE EVERY SIX-MONTHS** (before March 28, 2007, and October 28, 2007), the sampling required by Items 8(a) and 8(b) of this Order above must account for and be representative of the contributions from each one of the following batch discharged wastewaters:
- Tank 1 - spent alkaline solution
  - Tank 3 - spent alkaline soap solution
  - Tank 5 - spent nitric-acid deoxidation solution
  - Tank 7 - spent chromium conversion coating solution
  - Tank 8 - spent chromium conversion coating static rinse
  - Tank 9 - spent chromium conversion coating static rinse
  - Tank 10 - spent chromium conversion coating solution
  - Tank 11 - spent chromium conversion coating static rinse
  - Tank 12 - spent nitric-acid passivation solution
  - Tank 13 - spent nitric-acid passivation static rinse
9. pH Self-Monitoring Summaries: **ONCE EACH MONTH**, Bruce Industries shall prepare summaries of the pH self-monitoring required by Items 8(a) and 8(d) of this Order above, for the compliance sampling point IWD-BR1 or any other representative compliance point(s) established in the future with written EPA approval, in accordance with the following schedule:
- a. Bruce Industries shall summarize all discrete pH measurements collected for the month by date and time;
- b. Bruce Industries shall summarize any continuous pH meter strip charts collected for the month by date to reflect the following:
1. The number of minutes each day in which the pH is below 2.0;
  2. The number of minutes each day in which the pH is below 5.0;
  3. The number of minutes each day in which the pH is below 5.5;
  4. The number of minutes each day in which the pH is above 10.0;
  5. The number of minutes each day in which the pH is above 12.5.

10. Sampling and Analysis: Bruce Industries shall self-monitor and analyze using the sampling protocols listed below, and the EPA approved analytical methods (or equivalent) necessary to achieve the detection limits indicated below:

parameters and pollutants	sampling method protocols	detection limits
cadmium	24-hour composite	10 µg/l
chromium	24-hour composite	10 µg/l
copper	24-hour composite	10 µg/l
lead	24-hour composite	10 µg/l
iron	24-hour composite	10 µg/l
nickel	24-hour composite	10 µg/l
silver	24-hour composite	10 µg/l
zinc	24-hour composite	10 µg/l
cyanide - amenable or total	24-hour manual composite grabs	10 µg/l
total toxic organics	grab	10 µg/l
oil and grease - petroleum	grab	1 mg/l
discharge flow rate (gpd)	water meter (continuous after 04/01)	-
pH (s.u.)	field grabs (continuous after 04/01)	0.1 s.u.

11. Self-Certifications: The toxic organics self-monitoring required by Item 8(d), above, may be replaced by self-certifications, after approval by EPA, of a toxic organics management plan as provided for in 40 CFR 433.12(a).

*Submittals*

12. By the **TWENTY-EIGHTH (28<sup>th</sup>) DAY OF EACH MONTH**, Bruce Industries shall submit all self-monitoring results for the previous month. The first monthly report is due on December 28, 2006 for the November 2006 self-monitoring. The 12th-and-last monthly report is due on November 28, 2007 for the October 2007 self-monitoring.
13. For each sample, Bruce Industries shall record the following:
- a. The sample results;
  - b. The EPA analytical methods used;
  - c. The date, time, location of sampling, and sampling point;
  - d. The type of sample (ie. 24-hour composite, grab, or manual composite);
  - e. Any batch discharged wastewaters listed in Section 8(f) above, accounted for by

the sample:

- f. The name of the laboratory used; and
  - g. Self-certifications in lieu of self-monitoring as allowed by Item 11 of this Order.
14. All reports submitted pursuant to this Order shall be signed by a principal executive officer of Bruce Industries and shall include the following self-certifying 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, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that all wastewater samples analyzed and reported herein are representative of the ordinary process wastewater flow from this facility. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

15. This Order is not and shall not be interpreted to be an NPDES permit under Section 402 of the Act [33 U.S.C. Section 1342], nor a Lyon County or State of Nevada sewer discharge permit under 40 CFR 403.8(f)(iii), nor shall it in any way relieve Bruce Industries of obligations imposed by the Act, or any other Federal, State or local law, including the Lyon County sewer use ordinances.

16. All submittals shall be mailed to the following addresses:

U.S. ENVIRONMENTAL PROTECTION AGENCY  
75 Hawthorne Street  
San Francisco, California 94105  
Attn: Greg V. Arthur (WTR-7)

NEVADA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
901 South Stewart Street, Suite 4001  
Carson City, Nevada 89701-5249  
Attn: Joe Maez

LYON COUNTY SANITATION DISTRICT  
34 Lakes Blvd. Suite 103  
Dayton, Nevada 89403  
Attn: Skeet Sellers

17. This Order takes effect upon signature.

*Original signed by:*  
*Alexis Strauss*

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Alexis Strauss  
Director, Water Division

**September 27, 2006**

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Dated