



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

January 15, 2008

In Reply Refer To: WTR-7

Lee Bertucci
American International Tooling, Inc.
2516 Business Parkway, Suite A
Minden, Nevada 89423

Re: November 26, 2007 Clean Water Act Inspection

Dear Mr. Bertucci:

Enclosed is the January 11, 2008 report for our inspection of the American International Tooling 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 **February 29, 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. As this facility currently does not discharge wastewater to the sewer system, Douglas County should issue a permit to the facility to restrict discharge and to verify that the facility continues to follow zero discharging practices.
3. NDEP should issue a stormwater permit to the facility for possible drainage and runoff from the outside bins.

We would like to thank you and Santiago Duenas 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: American International Tooling, Inc.
Industrial User Address: 2516 Business Parkway, Suite A, Minden, NV 89423
Inspection Date: November 26, 2007

EPA Region 9 Inspectors: Greg Arthur, Environmental Engineer
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
Branch

**Facility Contacts During
Inspection:** Lee Bertucci, President
Santiago Duenas, Production Manager

Report Prepared by Anna Yen on January 11, 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 26, 2007 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

American International Tooling moved to this location from Carson City two years ago. This facility manufactures seamer tooling, which consists of chucks and rolls, for the canning industry. The canning industry uses seamer tooling to seam a lid to the cylinder part of the can.

The facility manufactures seam tooling from 440C stainless steel. Metalworking machines perform the turning and grinding necessary to make the chucks and rolls. The machined parts are sent offsite to a different company for heat treatment.

A water-soluble coolant is used in the metalworking machines. The coolant in each machine is circulated in a closed loop and reused in each machine. The facility changes all coolant and hydraulic oils in the machines once per year. Also, when the facility cleans the machines, it vacuums the solvent up. Scrap metal is collected in a bin next to each machine. All the scrap metals and coolant from the machines are transferred to one of two pairs of bins outside. Mop water from mopping the floors is transferred to the same bins outside. Each pair of bins is set up vertically, one on top of the other. *See Photo 1 in the Appendix.* A plug is removed from the bottom of the top bin to allow the liquids to drain into the bin below. SWRS Scrap Metals hauls away contents of the top bin, and Reno Drain hauls contents of the bottom bin away.

The process area did not have any floor drains. The facility transfers liquid (e.g., coolant) from inside the building to the outside bins by a 55-gallon drum connected by a hose to a compressor. Using a second hose connected to the drum, liquids can either be vacuumed into the drum or blown out of it. *See Photo 2 in the Appendix.*

1.2 Facility Wastewater Sources and Other Wastes

American International Tooling does not generate any wastewater streams besides mop water, which is stored in the outside bins and hauled offsite.

Other liquid wastes include waste coolant and hydraulic oils, which are stored in the same outside bins as the mop water for hauling offsite. The only solid wastes are metal scraps from the metal machining. These solid wastes are hauled offsite.

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

1.3 Facility Process Wastewater Treatment System

No treatment system.

1.4 Wastewater Discharge

This facility does not discharge any wastewater. If the facility were to discharge wastewater into the sewer system in the future, wastewater from this facility would discharge 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.

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, since it does not discharge any wastewater, it does not discharge an average of 25,000 gallons per day or more of process wastewater to the POTW, and it has no reasonable potential for adversely affecting the POTW's operation or for violating Pretreatment Standards.

2.2 Compliance with Local Limits and State Requirements

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.

The outside bins are used to store scrap metals and liquids such as waste coolant, waste hydraulic oil, and dirty mop water. Because a possibility always exists for the liquid to spill out of or overflow from the bins (e.g., during hauling offsite or overfilling of bins), the State should issue a stormwater permit to the facility for possible drainage and runoff from these bins.

3.0 Summary of Findings

1. This facility is not subject to any federal categorical standards.
2. This facility does not discharge any wastewater to the sewer system.
3. This facility is not an SIU.

4. Douglas County should issue a permit to the facility to restrict discharge to verify its current zero discharging practices.
5. NDEP should issue a stormwater permit to the facility for possible drainage and runoff from the outside bins.

Appendix: Photos



Photo 1

Photo #1: Outside storage bins for wastes that will be hauled offsite
Taken by Greg Arthur on November 26, 2007



Photo 2

Photo #2: Drum for transferring liquids to the outside storage bins
Taken by Greg Arthur on November 26, 2007