



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

January 15, 2008

In Reply Refer To: WTR-7

Gabriel Patmont
Patmont Motor Werks
2220 Meridian Blvd
Minden, Nevada 89423

Re: November 26, 2007 Clean Water Act Inspection

Dear Mr. Patmont:

Enclosed is the January 11, 2008 report for our inspection of the Patmont Motor Werks 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 subject to the federal categorical standard for metal finishing (40 CFR 433.17). Therefore, the facility is also a significant industrial user and subject to applicable pretreatment requirements in 40 CFR 403.
2. Douglas County should issue a permit to the facility to establish discharge limits.
3. All flows should drain to the sump to be pumped to the onsite wastewater treatment system.

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: Patmont Motor Werks
Industrial User Address: 2220 Meridian Blvd., 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 Inspector: Catherine Pool, Civil Engineer Senior

Douglas County Community Development

State Inspector: Joe Maez, Staff III Engineer

Nevada Division of Environmental Protection

Facility Contacts During Inspection: Gabriel Patmont, Vice President
Jeff Aldritch, Plant 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

Patmont Motor Werks began operation at this facility four years ago. This facility produces scooters and go-carts.

Certain components such as motors, batteries, wheels, tires, and tubing are purchased from other companies. This facility performs work such as installing the rims on wheels; manufacturing the brakes, spacers, and handlebar mounts; bending and welding tubing to make the scooter frames. This facility then assembles the parts together to make the final products.

Metalworking

A machine is used to bend tubing to make the handlebars. A milling machine is used to make the handlebar mounts. Other types of metalworking machines make the spacers and other metal parts. Sheet metal work is also performed at this facility. When the facility replaces the hydraulic fluid or the coolant used in these machines, the liquids are transferred to a 55-gallon drum which sits on a pallet inside the building. This waste is hauled offsite by Safety-Kleen. The metal scraps that exit from the machines are collected in bins and sent to Western Metals Recycling.

Deburring of metal parts is performed both by sanding and vibratory methods. From vibratory deburring, tailwater drains to a sump which leads to the sewer system.

Coating of Metal Parts

A two-stage machine cleans steel parts to remove the grease coating from metalworking and to prepare the parts for powder coating. The steel parts are placed on hooks which carry the parts into the machine. The phosphate coating is applied, using a phosphoric acid solution which is reused within the machine. The parts are then spray rinsed with water. The wastewater is discharged to a sump. A sump pump sends the wastewater to a treatment system. After the parts are phosphated, they are powder coated. A dry scrubber treats the air emissions. No floor drains were observed around the powder coating area.

Aluminum parts are sent offsite to another company to be anodized.

Wood Parts

Wood shipped from Latvia is sanded at this facility. Dust particles are transferred to a bin outside for disposal. No floor drains were in the sanding area.

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

1.2 Facility Wastewater Sources and Other Wastes

This facility generates wastewater streams from the phosphating step prior to powder coating of metal parts. This wastewater is sent through a treatment system. Another source of wastewater at this facility is tailwater from vibratory deburring. This wastewater drains to a sump which leads to the sewer system.

Other liquid wastes generated include used coolant and hydraulic fluids, which are hauled offsite. The only solid wastes are metal scraps from the metal machining. These solid wastes are also hauled offsite.

1.3 Facility Process Wastewater Treatment System

The spray rinse discharge from the phosphating line drains to a sump. *See Photo 1 in the Appendix.* A sump pump then pumps the wastewater to the first part of the wastewater treatment system: a 1500-gallon holding tank. *See Photo 2 in the Appendix.* The wastewater then flows into a horizontal, baffled tank containing lime chips. *See Photo 3 in the Appendix.* The wastewater exits the tank into a floor drain which leads to the sewer system. *See Photo 4 in the Appendix.* The wastewater treatment system, as well as the two-stage machine with the phosphating line, is located in an area that has secondary containment.

EPA inspectors observed a hose with one end in the floor drain. *See Photo 5 in the Appendix.* Though nothing was being transferred by hose at the time of the inspection, EPA recommends that hoses be removed from the area and, particularly, the floor drain. All flows should be draining to the sump to be pumped to the wastewater treatment system.

After looking at the facility's written records of pH measurements taken both upstream and downstream of the holding tank, EPA inspectors concluded that the lime in the horizontal tank was spent. The facility's records indicated no substantial increase in pH after the wastewater flowed through the lime chips.

1.4 Wastewater Discharge

Wastewater from this facility will 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 subject to the federal categorical standard for metal finishing, 40 CFR 433.17. The phosphating of steel parts performed at this facility triggers applicability of this categorical standard.

2.1 Compliance with Other Federal Pretreatment Requirements

This facility is a significant industrial user (SIU) because it is subject to a federal categorical standard. Therefore, it must comply with pretreatment requirements in 40 CFR 403, including reporting requirements in 40 CFR 403.12.

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 not only to establish discharge limits per the applicable federal categorical standard and other applicable federal pretreatment requirements, but also to regulate pollutants of concern that the County identifies in the effluent.

3.0 Summary of Findings

1. This facility is subject to the federal categorical standard for metal finishing, 40 CFR 433.17, because of the phosphating step.
2. This facility is an SIU. Therefore, the facility is subject to applicable pretreatment requirements in 40 CFR 403.
3. Douglas County should issue a permit to the facility to establish discharge limits.
4. All flows should drain to the sump to be pumped to the wastewater treatment system.
5. The lime in the horizontal tank of the wastewater treatment system is spent.

Appendix: Photos



Photo 1

Photo #1: Sump from which wastewater is pumped to the onsite wastewater treatment system

Taken by Greg Arthur on November 26, 2007



Photo 2

Photo #2: Wastewater treatment system - holding tank

Taken by Anna Yen on November 26, 2007



Photo 3

Photo #3: Wastewater treatment system - horizontal tank containing lime chips
Taken by Anna Yen on November 26, 2007



Photo 4

Photo #4: Discharge line from horizontal tank to floor drain
Taken by Anna Yen on November 26, 2007



Photo 5

Photo #5: Hose in the floor drain
Taken by Anna Yen on November 26, 2007