

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
FACT SHEET
(Pursuant to NAC 445A.236)

Permittee: Reno Drain Oil Service
11970 I-80 East
Sparks NV 89434

Permit No.: NEV92028

Facility: Reno Drain Oil Service
11970 I-80 East
Washoe County
Latitude: 39° 31' 21.2" North
Longitude: 119° 37' 45.7" West
Township 19 N - Range 21 E - Section 9

General: Reno Drain Oil Service is located in Washoe County on the foothills of the Pah Rah Range, north of Truckee River and Interstate 80, near the Mustang exit. The company collects used automotive oil from shops in the area and processes it into a fuel product for sale. Waste oil is typically about 10% water, and the process consists of several days of gravity separation in a holding tank, after which the water layer is drawn off and treated via flocculation, filtration, and carbon adsorption to achieve a TPH concentration of less than 1 mg/l. The treated water is used for dust control at a nearby location.

Flocculation is initiated by lowering the pH to the acid range, bringing it back to neutral, then adding a polymer. The flocs are removed by a diatomaceous earth filter in a rotating vacuum drum (Alar Auto Vac). The filtration unit periodically slices off the upper layer of diatomaceous earth, which contains most of the hydrocarbon, for disposal at Lockwood Landfill.

A carbon absorption system consisting of three canisters (1000 lb total) follows the vacuum filtration unit. According to Reno Drain Oil, the Alar effluent meets the 1 mg/l TPH limit; and the carbon system is for polishing purposes only, particularly for removing antifreeze (ethylene glycol and dye). The company changes the carbon when the clarity of the effluent decreases.

Currently, the treated water is used for dust control as part of a project to remove several thousand cubic yards of shredded automotive interiors from an adjacent property. The material is being brought to Lockwood Landfill. The property was formerly the site of Mustang Metals and was purchased by Reno Drain Oil in 1999. Cleanup of the site is being conducted pursuant to the requirements of the Washoe County Health District. In addition, the proposed permit would also authorize use of the treated effluent for dust control at Lockwood Landfill and at construction sites in general.

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Receiving Water Characteristics: The groundwater is at a depth of approximately 175 ft and considered potable, based on the location of the Sage Trailer Park public supply well nearby.

Rational for Permit Requirements: The flow limit has been set at 6000 gpd based on the 4 gpm capacity of the carbon system and 24 hr/day operation. The TPH limit of 1 mg/l, the pH limit of 6.0 to 9.0 standard units, and the annual metals analyses were retained from the previous permit. The TPH and pH limits are considered sufficient for dust control, and the annual metals analyses are a spot check.

The monitoring location has been changed from the holding tanks to the carbon system. The previous permit required a composite sample of each full tank prior to loading the water trucks. The proposed permit requires monthly sampling of the effluent from the carbon system, with an additional sample just prior to each carbon replacement event. As stated above, the company asserts the carbon is for polishing purposes only, and the data to be generated by the proposed permit should confirm that. Also, this removes the need to mix the tank contents prior to collecting a sample, and allows the company greater flexibility in scheduling water use. The monitoring requirements from the permit are reprinted below.

Table I.A.1

Parameter	Discharge Limitations		Monitoring Requirements		
	30 Day Average	Daily Maximum	Sample Locations	Measurement Frequency	Sample Type
Flow	6000 gpd	-	water trucks	each fill	count ⁽¹⁾
TPH ⁽²⁾	-	1.0 mg/l	effluent of carbon system	monthly ⁽³⁾	discrete
pH		between 6.0 and 9.0 standard units	effluent of carbon system	monthly ⁽³⁾	discrete
Metals ⁽⁴⁾		monitor & report	effluent of carbon system	annual (third quarter)	discrete

- (1) Flow shall be reported based on the capacity of the trucks and the number filled.
- (2) EPA Method 8015b, full range, to include ethylene glycol.
- (3) In addition, a sample shall also be collected immediately prior to each carbon replacement event. See Part I.A.2.
- (4) ICP Metals - Total, by EPA Method 200.7. Detection limits shall be sufficient to demonstrate compliance with water quality standards.

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Schedule of Compliance: The Permittee shall achieve compliance with the effluent limitations upon the effective date of the permit.

Procedures for Public Comment: Notice of the Division's intent to renew discharge permit NEV92028, authorizing application of treated effluent for dust control purposes at the former Mustang Metals site, Lockwood Landfill, and general construction sites, is being sent to the **Reno Gazette Journal** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit must submit written comments to the Division within (30) days of the publication date. The comment period can be extended at the discretion of the Administrator. The deadline for receipt of all written comments is Friday June 25, 2004 by 5:00 pm. Comments postmarked prior to that deadline will also be accepted.

A public hearing on the proposed determination can be requested by the applicant, any affected state or interstate agency, the Regional Administrator, or any interested agency, person, or group of persons. The request must be filed within the comment period and indicate the interest of the person filing the request and the reasons why a hearing is warranted. Public hearings granted by the Division are conducted in accordance with NAC 445A.238.

The final determination of the Division may be appealed to the State Environmental Commission pursuant to NRS 445A.605.

Proposed Determination: The Division has made the tentative determination to renew the proposed discharge permit for a five year term.

Prepared by: Robert J. Saunders
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 Bureau of Water Pollution Control
 May 17, 2004