

**NEVADA DIVISION OF ENVIRONMENTAL PROTECTION**

**FACT SHEET**

(pursuant to NAC 445A.236)

**Permittee Name:** Bureau of Land Management  
United States Department of the Interior  
50 Bastian Road  
Battle Mountain, NV 89820

**Permit Number:** NEV2000506

**Location** Battle Mountain Bureau of Land Management Air Attack Base  
Airport Road  
Battle Mountain, Lander County, Nevada  
Township 32N. Range 45E, Section 35

Latitude: 40° 36' 31.5" N  
Longitude: 116° 52' 13.6" W

**Permitted Flow** 30-Day Average Flow: 1,600 gallons per day  
Daily Maximum Flow: 48,000 gallons per day

**Well Head Protection**

The facility is not within a 2-, 5-, or 10-year wellhead protection program capture zone. The facility is not within the 7000-foot buffer zone for any domestic water supply wells. Raw water from an onsite well is not potable, but is used for mixing of fire retardant chemical, and for tank and airport apron rinsing.

**General:**

The United States Department of the Interior Bureau of Land Management (BLM) operates the Battle Mountain Air Attack Base, located adjacent to Interstate Highway 80, approximately four (4) miles east of Battle Mountain, Lander County, Nevada. Lander County owns the Air Attack Base (AAB), which is leased to BLM for fire fighting operations. The AAB is used mainly as an aircraft base for wild fire suppression, and serves Nevada and the Great Basin.

Fire retardant chemicals are mixed and loaded onto aircraft at the site. The product reportedly used at the site is Phos-Chek® LC-95A, an ammonium polyphosphate (>85% by weight), with minor amounts of clay thickener, iron oxide (for color) and proprietary performance enhancers.

The waste stream from this facility consists of spilled fire retardant, retardant tank rinsing water, aircraft wash-down water, and precipitation from the aircraft-parking apron. Any oil lost from the aircraft will be removed using absorbent materials before any wash-down of the apron occurs. The fluid waste stream is piped to discharge to an HDPE-lined evaporation/containment pond for

evaporation. Total pond volume is estimated at approximately 71,900 cubic feet or approximately 537,000 gallons. Discharge occurs only during the fire season, which generally lasts from June 1 through October 1. Accumulated solids in the pond are removed when the pond is not in service, and are disposed in the local sanitary landfill. If necessary to maintain the minimum two (2) feet of freeboard required in the permit, the Permittee may pump out and store excess wastewater for retardant mixing purposes, or may dispose of stored excess water at a certified hazardous material disposal facility.

When the base is closed at the end of the fire season, the aircraft-parking apron is washed down to remove residual fire retardant and incidental oil, and the 30,000-gallon fresh water storage tank is emptied. This has led to exceedance of the current daily maximum permit limitation of 2,700 gallons per day. For this reason, the daily maximum flow permit limitation will be set at 48,000 gallons per day for the permit renewal. The 30-day average permit limitation remains the same as the current permit, at 1,600 gallons/day.

After end-of-season cleaning, precipitation from the apron is diverted to an existing collection box, and will be handled by the existing airport drainage system. No wastewater will be discharged to the pond during the off fire season.

The applicant seeks renewal of permit #NEV2000506 for the facility meeting the Nevada zero-discharge standard of performance.

**Receiving Water Characteristics:**

Groundwater immediately below the site is encountered at 11.37 feet. Groundwater gradient is reported to be due north. The water is non-potable, but is used for mixing fire retardant and for cleaning purposes. There is one monitor well installed downgradient of the pond area. During the term of the current permit, the following groundwater analyses have been reported:

<b>Parameter</b>	<b>Average</b>	<b>Maximum</b>	<b>Minimum</b>
Total Petroleum Hydrocarbons – Purgable (mg/l)	Not Detected	Not Detected	Not Detected
Total Petroleum Hydrocarbons – Extractable (mg/l)	Not Detected	Not Detected	Not Detected
Total Nitrogen as N (mg/l)	1.6	3.3	1
Total Dissolved Solids (mg/l)	2950	3000	2800

**Proposed Effluent Limitations, Monitoring Requirements, and Schedule of Compliance**

**DISCHARGE MONITORING**

The discharge to the evaporative pond shall be limited and monitored according to the following table:

Parameter	Effluent Discharge Limitations		Monitoring Requirements	
	30-Day Average	Daily Maximum	Measurement Frequency	Sample Type
Flow (gallons / day)	1,600	48,000	Continuous	Calculate or Flow Meter
Total Petroleum Hydrocarbons (mg/l) (EPA Method 8015 Modified)	Monitor and Report		Monthly	Discrete
Ammonia (mg/l)	Monitor and Report		Monthly	Discrete
Phosphate (mg/l)	Monitor and Report		Monthly	Discrete
Total Dissolved Solids (mg/l)	Monitor and Report		Monthly	Discrete

**GROUNDWATER MONITORING:**

Groundwater monitoring well #1, downgradient of the lined pond, shall be limited and monitored according to the table below.

Parameter	Requirements	Frequency	Sample Type
Depth to Groundwater (feet)	Monitor and Report	Quarterly	Field Measurement
Groundwater Elevation (feet AMSL)	Monitor and Report	Quarterly	Calculate
Total Petroleum Hydrocarbons (mg/l) (EPA Method 8015 Modified)	Monitor and Report	Quarterly	Discrete
Total Nitrogen as N (mg/l)	Monitor and Report	Quarterly	Discrete
Total Dissolved Solids (mg/l)	Monitor and Report	Quarterly	Discrete

**Schedule of Compliance**

The Permittee shall implement and comply with the provisions of the schedule of compliance after approval by the Administrator, including in said implementation and compliance any additions or modifications that the Administrator may make in approving the schedule of compliance.

The Permittee shall achieve compliance with the effluent limitations upon issuance of the permit.

**Procedures for Public Comment:**

The Notice of the Division's intent to issue a permit authorizing the facility to operate, subject to the conditions contained within the permit, is being sent to the **Battle Mountain Bugle** and the **Elko Daily Free Press** for publication. The notice is being mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit may do so in writing for a period of 30 days following the date of the public notice. All comments regarding this permit must be received or postmarked by **5:00 PM on November 3, 2005**. The comment period can be extended at the discretion of the Administrator.

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected interstate agency, the Regional Administrator or any interested agency, person or group of persons.

The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted.

Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the proposed discharge or any other area the Administrator determined to be appropriate. All public hearings must be conducted in accordance with NAC 445A.238.

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

**Proposed Determination**

The Division has made the tentative determination to reissue the proposed permit for a period of five (5) years.

**Rationale for Permit Requirements**

The design of this facility meets the State's zero discharge standard of performance. No discharge of fluids or wastes is allowed at the facility. Ground water monitoring is required to confirm that contaminants have not entered the waters of the State.

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