

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

**Permittee Name:** Northern Nevada Acquisitions , LLC  
 dba Reno Old Town Mall Annex  
 6995 Sierra Center Parkway, Suite 1  
 Reno, Nevada, 89511

**Permit Number:** NV0023825

**Discharge Location::** The Cleaners at Reno Old Town Mall Annex  
 180 West Peckham Lane  
 Reno, Washoe County, Nevada 89509  
 Section 25, T. 19N., R. 19 E. MDB&M

Latitude: 39.48722° N (39° 29' 14" N)  
 Longitude: 119.79806° W (119° 47' 53" W)

**Receiving Water:** Steamboat Creek via Cochran Ditch

**Drinking Water Protection:**

The facility is outside the 6,000 foot Drinking Water Protection Area (DWPA) around any public water supply wells. The facility is not within a currently established Wellhead Protection Area (WHPA) or capture zone.

**Corrective Actions Sites:**

The subject facility is within 1 mile of the following Bureau of Corrective Actions (BCA) sites. The BCA case officers in charge of these sites have indicated that adverse effects of the proposed project on the ongoing corrective activities are not anticipated.

<b>Project ID #</b>	<b>Site Number</b>	<b>Facility Name</b>	<b>Corrective Action Type (Media/Source/Contaminant)</b>
1867	4-000340	Shell Service Station	Groundwater/UST/Gasoline
5428	D-000749	Artist Cleaners	Groundwater/Unknown/Solvents

UST = Underground Storage Tank

**General:**

The Cleaners at Reno Old Town Mall Annex operates a dry cleaning operation at 180 W. Peckham Lane, Reno, Washoe County. In 2006, groundwater contamination from tetrachloroethene (PCE), an organic solvent used in the dry cleaning process, was attributed to the owner of the dry cleaning establishment at the subject location. In 2007, soil and groundwater remediation activities under the direction of BCA were initiated.

Groundwater remediation is accomplished using a Dual-Phase Extraction (DPE) System with two DPE wells, piping, a high-vacuum blower with liquid-separation tank and auto-drain system and a water treatment system. The water treatment system includes a sediment filter and three aqueous phase GAC absorbers in series, which remove volatile organic compounds from the impacted groundwater. Treated groundwater is discharged to Steamboat Creek via Cochran Ditch. Treatment capacity of the activated carbon vessels is 50 gallons per minute (gpm).

**Discharge Characteristics:**

Overall, the groundwater to be discharged is of good quality. Previously gathered data indicates the treatment system adequately removes Volatile Organic Compounds below BCA action levels prior to discharge.

**Receiving Water Characteristics:**

The treatment system will discharge into Cochran Ditch, which is tributary to Steamboat Creek downstream of USGS Gauging Station 10-349300. Steamboat Creek at the confluence with Cochran Ditch is a Class D water. Water quality standards for Class D waters are specified in NAC 445A.127.

**Proposed Effluent Limitations and Special Conditions:**

The water discharged from the groundwater remediation system to Cochran Ditch shall be limited, sampled and monitored by the Permittee as specified below. Samples and measurements taken in compliance with the monitoring requirements and permit limits shall be taken at the following locations:

Flow:	Totalizing Flow Meter (FM)
All other Parameters:	Final Discharge to Cochran Ditch (FD), and Sample Port Between Carbon Vessels CA-2 and CA-3 (ID)

Discharge shall be limited and monitored as specified below:

**Table 1: Discharge Limitations**

PARAMETERS	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS		
	30-Day Average	Daily Maximum	Sampling Location	Measurement Frequency	Sample Type
Flow <sup>1</sup> , MGD	M&R	0.072	FM	Continuous	Flow meter
Volatile Organic Compounds, µg/L (EPA Method 8260B)	Monitor & Report <sup>2</sup> (report all parameters)		FD, ID	Quarterly	Discrete
Total Petroleum Hydrocarbons, mg/L (EPA Method 8015B)	---	1.0	FD	Quarterly	Discrete
Tetrachloroethene (PCE), µg/L	---	5	FD	Quarterly	Discrete
Benzene, µg/L	---	5	FD	Quarterly	Discrete
Ethylbenzene, µg/L	---	100	FD	Quarterly	Discrete
Toluene, µg/L	---	100	FD	Quarterly	Discrete
Xylenes, Total, µg/L	---	200	FD	Quarterly	Discrete
Methyl tertiary butyl ether (MTBE), µg/L	---	20	FD	Quarterly	Discrete
Activated Carbon Addition and Advancement, Date and Pounds	---	M&R	FD	Each Event	Discrete
Total Dissolved Solids, mg/L	Monitor and Report		FD	Quarterly	Discrete
pH, SU	6.5 ≤ pH ≤ 9.0		FD	Quarterly	Discrete

Notes:

1. Report gallons per day (GPD) and average gallons per minute (GPM) discharged.
2. Volatile Organic Compounds -Full range, report all parameters. This will include the organics listed below this entry in the table above.

mg/L: Milligram per liter.      µg/L: Micrograms per liter.      gpd: Gallons per day.  
 SU: Standard Units                      M&R: Monitor and Report

**Special Conditions:**

- a. Every precaution must be taken in the application of Best Management Practices to prevent and control any transport of pollutants into the Cochran ditch during the groundwater remediation project.
- b. The **NAI Alliance Property Management Group** bears the sole responsibility to ensure that the requirements of this permit are fully satisfied.
- c. Spent carbon shall be replaced when breakthrough has been detected, with the fresh

carbon being placed in the final canister and the other canisters rotated so that the oldest carbon is placed in the first position, and subsequent positions are occupied by decreasingly spent carbon. A sufficient amount of fresh carbon shall be available at all times to replace the activated carbon in both vessels at the same time.

**Rationale for Permit Requirements:**

The monitoring requirements and permit limits have been established to ensure that the receiving water is not degraded from discharge of treated groundwater. The requirements are consistent with other similar installations.

**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 which the Administrator may make in approving the schedule of compliance.

- a. The Permittee shall achieve compliance with the effluent limitations upon issuance of the permit.
- b. **By MMM DD, 2010**, the Permittee shall submit for review and approval an Operations and Maintenance Manual, prepared in accordance with the Division's WTS-2 guidance: *Minimum Information Required for an Operations and Maintenance Manual*.

**Procedures for Public Comment:**

The Notice of the Division's intent to issue an NPDES permit authorizing this facility to discharge for a five-year period, subject to the conditions contained within the permit, 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 can do so in writing for a period of thirty (30) days following the date of publication of the public notice in the newspaper. The comment period can be extended at the discretion of the Administrator. The deadline date and time by which all comments are to be submitted (via postmarked mail or time-stamped faxes, e-mails, or hand-delivered items) to the Division is **April 12, 2010 by 5:00 P.M.**

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 determines 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 issue the proposed NPDES discharge permit for a period of five (5) years.

Prepared by: Janine O. Hartley, P.E.  
Bureau of Water Pollution Control  
Draft: March 2010

**DRAFT**