

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

Permittee Name: Clark County School District
 2832 E. Flamingo Road
 Las Vegas, NV 89121

Permit Number: NV0023485

Location: Las Vegas Academy
 315 S. 7th Street
 Las Vegas, Clark County, NV 89101

DRAFT

Latitude: 36° 09' 55"N,
 Longitude: 115° 08' 23"W
 Township 20S, Range 61E, Section 34

Corrective Actions Sites: There are 17 Bureau of Corrective Actions (BCA) remediation sites located within a one-mile radius of the subject site. The BCA case officers in charge of these sites have indicated they do not anticipate adverse effects to the ongoing corrective activities due to the proposed discharge.

Project ID #	Site Number	Facility Name	Corrective Action Type (Media/Contaminant)
4135	H-000242	Western Hotel & Casino	Soil & Groundwater/Gasoline
4136	H-000243	Plaza Hotel & Casino	Soil & Groundwater/Diesel
1737	8-000323	Fire Station 1	Soil & Groundwater/Gasoline
3547	H-001275	Cantrell Cleaners	Soil & Groundwater/Solvents
1433	8-000278	Las Vegas Laundry & Dry Cleaners	Groundwater/Solvents
984	H-000093	Charleston Heights Shopping Center	Groundwater/Solvents
3114	8-001149	7-Eleven 27607	Groundwater/Gasoline
3115	8-001149	7-Eleven 27607	Soil & Groundwater/Gasoline
8446	8-001349	7-Eleven 29384	Groundwater/Gasoline
2296	H-000557	Union Pacific Railroad	Soil & Groundwater/Other
2730	8-000749	Unocal Service Station 4616	Soil & Groundwater/Gasoline
1954	8-000377	Exber Fremont Texaco	Soil & Groundwater/Gasoline
3830	8-001620	10 th Street Auto (Temple Realty)	Soil & Groundwater/Gasoline
3291	8-001049	ARCO 5326	Soil/Gasoline
3985	8-000016	ARCO 1718	Soil & Groundwater/Gasoline
3679	H-001337	Former Dry Cleaners (Abandoned)	Soil & Groundwater/Solvents
1457	H-000287	Doc's Automotive (Former)	Soil & Groundwater/Gasoline

Well Head and Drinking Water Supply Protection: The subject facility is not within the 6000' Drinking Water Protection Areas (DWPAs) around any public water supply wells: A Well Head Protection Area (WHPA) has not been established for this location.

General: Clark County School District operates Las Vegas Academy, a high school, in Las Vegas, Clark County, Nevada. The school complex includes an auditorium, part of which is constructed below the local water table. Groundwater at the site is encountered at approximately six (6) feet below ground surface; groundwater flow direction is reportedly northeast. Groundwater is collected in a network of slotted pipes, and is transported via gravity away from the building foundation to a wet well. Collected groundwater is pumped from the wet well by two 3-horsepower submersible pumps, which are operated by float-type level controllers. The pumped water is discharged to a sub-grade pipeline to the Clark County storm drain adjacent to the development, and ultimately to the Las Vegas Wash.

Discharge Flow and Characteristics: The permit was originally issued for up to 100,000 gallons per day. Over the course of the permit term (2005-2010), the maximum discharge reported was 3000 gallons per day. Therefore, the permit flow limit is proposed to be modified in the permit renewal to the lowest discharge category, up to 50,000 gallons per day.

A summary of analytical testing of the groundwater discharged during the permit term is listed in the following table. Total Petroleum Hydrocarbons (TPH) and Volatile Organic Compounds (VOCs) were not detected.

PARAMETER	PERMIT LIMIT	AVERAGE	MAXIMUM	MINIMUM
Flow (MGD)	0.10	0.00194	0.00296	0.00131
Total Dissolved Solids (mg/L)	2400	2346.7	2500	2200
Total Inorganic Nitrogen (mg/L)	20	3.62	4.5	3.2
Total Phosphorus (lb/day)	1.0	---	---	---
(mg/L)	Report	<0.1	<0.1	<0.1
Total Ammonia (lb/day)	1.0	---	---	---
(mg/L)	Report	<0.5	<0.5	<0.5
pH (Standard Units)	6.5-9.0	7.89	8.11	7.67
TPH (mg/L)	1.0	<0.3	<0.3	<0.3
VOCs (µg/L)	Report	None detected at appropriate method reporting limits.		

Receiving Water Characteristics: The dewatering system discharges into a Clark County stormdrain inlet, which eventually discharges to the Upper Las Vegas Wash. Water quality standards for the Upper Las Vegas Wash are specified in NAC 445A.199. The requirements to maintain existing higher quality waters apply.

Proposed Effluent Limitations and Special Conditions: The proposed permit limitations and monitoring requirements are listed below:

Table I.A.1: Permit Limits and Monitoring Requirements

PARAMETER	DISCHARGE LIMITATIONS	MONITORING REQUIREMENTS	
	Daily Maximum	Measurement Frequency	Sample Type
Flow, MGD	0.05	Continuous	Flow Meter
Total Dissolved Solids, mg/L	Monitor & Report	Annually ²	Discrete
Selenium, mg/L	Monitor & Report	Annually ²	Discrete
Total Inorganic Nitrogen as N, mg/L	20	Annually ²	Discrete
Total Phosphorus as P, lbs/day	1.0*	Annually ²	Discrete
Ammonia as N, lbs/day	1.0*	Annually ²	Discrete
pH, (Standard Units)	6.5 – 9.0	Annually ²	Discrete
Total Petroleum Hydrocarbons ¹ , mg/L	1.0	Annually ²	Discrete
Volatile Organic Compounds, µg/L (Full Range, plus MTBE, Method 8260B),	Monitor & Report	Annually ²	Discrete

1. EPA Methods 8015B and 8260B, extractable and purgable, C6-C40.
 2. Annual sampling results will be submitted with the fourth quarter DMR.
- * Deminimis load allowed for permit.

Rationale for Permit Requirements: The monitoring requirements for the site are consistent with the requirements for maintaining higher water quality, as stated in NAC445A.198. Initial samples suggest that the groundwater collected from the facility does not contain significant amounts of phosphorus or ammonia; these parameters have been considered deminimis, and limits have been set at 1.0 lb/day accordingly. Based on previous monitoring, the Permittee will be required to monitor discharge on an annual basis to ensure that the receiving water (Las Vegas Wash) is not degraded from dewatering at the Las Vegas Academy, which has the potential to capture possible offsite groundwater contamination.

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 NPDES permit on issuance.
- b. **By MMM DD, 2011**, the Permittee shall submit for review a copy of the Operations & Maintenance (O&M) Manual for the Las Vegas Academy dewatering system, prepared in accordance with appropriate sections of the Division's WTS-2 guidance:

Minimum Information Required for an Operations and Maintenance Manual. The manual shall describe the Best Management Procedures (BMPs), which have been employed at the site to minimize the introduction of contaminants/pollutants into the stormdrain. The document shall be wet stamped and signed by a Nevada Professional Engineer (P.E.), and shall be submitted for review to the address below:

**Division of Environmental Protection
Bureau of Water Pollution Control
ATTN: Compliance Coordinator
901 S. Stewart Street, Suite 4001
Carson City, NV 89701-5249**

Proposed Determination: The Division has made the tentative determination to issue (renew) the proposed NPDES discharge permit for a period of five (5) years

Procedures for Public Comment: The Notice of the Division's intent to issue an NPDES permit authorizing this facility to discharge to the Las Vegas Wash for a five-year period, subject to the conditions contained within the permit, is being sent to the **Las Vegas Review-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 **June 6, 2011 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.

Prepared by: Janine O. Hartley, P.E.
Draft: March 2011
Final: