



STATE OF NEVADA

Department of Conservation & Natural Resources

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

DIVISION OF ENVIRONMENTAL PROTECTION

Colleen Cripps, Ph.D., Administrator

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION FACT SHEET

(pursuant to NAC 445A.236)

Permittee Name: Western Elite, Inc.
420 North Nellis Boulevard #A3-167
Las Vegas, Nevada 89110

Permit Number: NEV2011508

Location: Western Elite Class III Industrial Solid Waste Disposal Site
US Highway 93 - Mile marker 8
Approximately 65 miles north of the City of Las Vegas
Lincoln County, Nevada
Township 11 South, Range 62 East, Section 25

Evaporation Ponds A and B
Latitude: 36° 58' 7" N
Longitude: 114° 58' 45" W

Drinking Water Protection Area and Wellhead Protection Areas:

The Western Elite Class III landfill is approximately 30 miles from the nearest inhabited dwelling and place of public gathering. There are no public water supply wells or wellhead protection areas within a 1-mile radius of the evaporation ponds.

Bureau of Corrective Actions:

There are no Bureau of Corrective Actions remediation sites within one mile of this facility.

General:

Western Elite, Inc. currently operates a Class III industrial solid waste disposal site under a Nevada Division of Environmental Protection (NDEP) Bureau of Solid Waste (BSW) permit (SW-277). The site is located in southern Lincoln County approximately 65 miles north of Las Vegas and 30 miles south of Alamo. The site is comprised of approximately 83 acres. Current waste acceptance for this site includes construction and demolition wastes, automobile shredder residue, waste tires, industrial wash water sump and grease trap wastes, asbestos, water treatment plant solids/biosolids, and pulp and paper solids.

Western Elite is in the process of constructing two evaporation ponds for the acceptance of non-hazardous industrial wash water. Industrial wash water examples for the purpose of this permit include, but are not limited to, waste water from industrial vehicle washing or waste water from industrial site parking lot and facility washing. Industrial wash water will be transported to the facility and discharged into the ponds via tanker trucks. The liquids will be evaporated and any residual solids will be disposed of in the adjacent Western Elite permitted landfill according to the BSW permitted guidelines. The ponds are expected to be operated in a batch delivery rather than continuous flow basis.

The ponds are located adjacent to but outside of the active landfill footprint. Each pond has a surface dimension of 150-feet by 150-feet (0.52 acres) with a depth of approximately 12 feet. The combined working volume of the ponds is approximately one million gallons. The pond design adopts the Bureau of Water Pollution Control (BWPC) Water Technical Sheet (WTS)-37 and utilizes a double liner system, 60-mil high density polyethylene (HDPE) upper geo-membrane and a 40-mil HDPE lower geo-membrane, with an interstitial Leak Collection and Recovery System (LCRS) for groundwater protection.

Liquid waste received at the Western Elite evaporation ponds must be approved in accordance with the Operations and Maintenance (O&M) manual procedures for profiling and waste acceptance. Prior to issuing approval to process non-hazardous industrial wash water, analytical testing of the waste stream is performed at the generator's expense to determine whether the mixture is hazardous or not. Records of these profiling analytical results will be kept by the permittee in accordance with the records management practices described in the Division-approved O&M manual.

This permit, NEV2011508, does not regulate activities performed by the Permittee within the Western Elite Class III Industrial Solid Waste Disposal managed areas.

Receiving Water Characteristics:

The evaporation pond system is designed to a zero-discharge standard of performance. The engineered evaporation ponds, as constructed, and when operated and maintained properly, prevent discharges to groundwaters of the State. Groundwater elevations within the limits of the facility range from approximately 43 to 63 feet below ground surface. The groundwater flow is reported to be east-southeast.

Permit Limitations and Monitoring Requirements:

During the period beginning on the effective date of this permit, and lasting until the permit expires, the Permittee is authorized to accept and manage industrial wash water as part of a lined pond evaporation facility. The Permittee shall be required to monitor activities at the facility according to the monitoring schedule in Table 1 below:

Table 1: Permit Requirements

PARAMETER	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS		
	30-Day Average	Daily Maximum	Sample locations	Measurement Frequency	Sample Type
Total Liquid Acceptance (gallons/day)	8,200	50,000	Acceptance Area	Each Load	Calculate Est Load Measure
Total Dissolved Solids (mg/l)	Monitor & Report		Pond A Pond B	Quarterly	Discrete
pH, standard units (S.U.)	Monitor & Report		Pond A Pond B	Quarterly	Discrete
NDEP Profile I (mg/l)	Monitor & Report		Pond A Pond B	Quarterly	Discrete
Full-Range TPH, (mg/l) (Purge & Extract)	1.0		Pond A Pond B	Quarterly	Discrete
Pond Freeboard (feet)	≥2.0		Pond A Pond B	Weekly	Inspection
Leak Collection and Recovery System	Monitor & Report		Pond A Pond B	Weekly	Inspection
Primary Liner Leakage Rate (gallons/day-acre)	≤500		Pond A Pond B	Weekly	Calculate

mg/l: milligrams per liter

S.U.: Standard Units

TPH: Total Petroleum Hydrocarbons

Schedule of Compliance:

The Permittee shall implement and comply with the provisions of the Schedule of Compliance after approval by the Division, including in said implementation and compliance, any additions or modifications that the Division may make in approving the Schedule of Compliance. Schedule of Compliance submittals and evidence of compliance documents shall be submitted to the Bureau of Water Pollution Control (listed in Part I.B.2.a of the permit). The Permittee shall implement and/or execute the following Schedule of Compliance requirements:

- a. Within sixty (60) days of the permit issue day (by **August 16, 2012**), the Permittee shall submit two (2) copies of an Operations & Maintenance (O&M) Manual, prepared in accordance with applicable sections of WTS-6: *Guidance Document for Wastewater Pond System O&M*, for review and approval.
- b. Prior to initiating any change to an approved O&M manual or approved system plan, in accordance with permit Part I.A.3 or Part I.A.4, a revision requesting such change must be prepared and submitted to the Division for an approval. The Permittee, or designated representative, shall adequately address all comments and concerns relating to the Division’s review of a revised O&M manual or system plan.

Rationale for Permit Requirements:

The Division's rationale for the proposed monitoring conditions is as follows:

- ***Flow and Leak Detection:*** Acceptance of industrial wash water and volumes of water collected from the leak detection system are monitored so that potential leakage can be quickly discovered and remedied, to maintain pond integrity. The maximum allowable leakage rate for the primary liner is 500 gallons/acre-day.
- ***Total Dissolved Solids:*** TDS is monitored to keep NDEP and the Permittee apprised of the quality and composition of any fluid stored in the pond.
- ***pH:*** Sampled quarterly to provide additional information on pond supernatant quality should a catastrophic leak in the liner system occur.
- ***Profile I Analysis:*** Various parameters, including metal concentrations, are monitored in the Profile I analysis. This permit requirement is in place to monitor any metals that may be present.
- ***Pond Water Level:*** The liquid level depth in each pond is measured weekly to determine freeboard and storage volume.
- ***TPH:*** The limit of 1.0 mg/l is based on Bureau of Corrective Actions remediation action standards.

Procedures for Public Comment: The Notice of the Division's intent to issue a new zero-discharge permit to the applicant, subject to the conditions contained within the permit is being sent to the **Las Vegas Review Journal and Lincoln County Record** 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 17, 2012 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 permit for a period of five (5) years.

Prepared by: Michele R. Reid
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Bureau of Water Pollution Control
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