

# NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

## FACT SHEET (pursuant to NAC 445A.236)

**Permittee:** Sierra Development Company  
dba Club Cal Neva  
P.O. Box 2071  
Reno, Nevada 89505-2071

**Permit:** NV0021067 – Renewal

**Location:** Club Cal Neva Nevadan Hotel  
former Riverboat/Onslow Hotel Tower  
133 North Virginia Street  
Reno, Nevada 89501

Latitude: 39° 31' N  
Longitude: 119° 48' W

Township 19N, Range 19E, Section 11, NW of SE ¼ MDB&M

**Flow:** 0.0495 Million gallons per day (MGD) 7-day Average

**General:** The Permittee has applied for a National Pollutant Discharge Elimination System (NPDES) permit to continue to discharge untreated groundwater from a basement sump at 133 North Virginia Street to the Truckee River via the City of Reno Stormdrain System. An NPDES Permit for this discharge was first issued November 8, 1977 to the Onslow Hotel and Casino for a discharge of 0.0072 MGD and later transferred to the Riverboat Hotel and Casino to include dewatering from 34 West Second Street. The Riverboat was acquired by the Permittee on April 26, 1999.

Groundwater is collected in a sump located in the basement of the hotel tower on Virginia Street between First and Second Streets. The basement, used for storage and valet parking, is three floors below street level. The sump has a concrete berm, effective height approximately eight inches, to exclude spilled fluids and is outfitted with dual submersible pumps with level floats and a two-inch, ductile iron discharge line. The design limits the pumping capacity of the system and necessitates the use of a portable unmetered pump during high flows with discharge to the alley. This has occurred three times over the last five years.

The flow rate in the permanent discharge line is recorded by a totalizing propeller meter. There are three lines that discharge into the top of the sump and one line that discharges into the sump from the sump sidewall. The line that enters through the sidewall is from a parking area collection system. One of the top discharge lines is from the fire water system, potable water.

The April 1996 permit renewal added a second sump for casino dewatering to the permit and was mentioned in May 7, 1994 and August 27, 1998 compliance evaluation reports. In February 1997, the Permittee notified the Division that there is no outfall 002. The Permittee no longer controls the casino portion of the former Riverboat. No discharge from the former Outfall 002 is authorized by this permit. This renewal will designate the temporary discharge as Outfall 003.

The 1977 permit required monitoring of flow, settleable solids, turbidity, pH, total dissolved solids (TDS), and oil and grease (O&G). The 1983 permit required monitoring of flow, turbidity, TDS, and O&G. The 1988 permit required monitoring of flow, turbidity, TDS, O&G, and pH. Since 1996, the permit has required the monitoring of flow, volatile organic compounds EPA Method 624, total nitrogen as N, phosphorous, and O&G with O&G replaced by total petroleum hydrocarbons, SW-846 Method 8015, in September 1998.

The total nitrogen and total phosphorous concentrations of this discharge were not monitored at the time of the 1994 Truckee River Total Maximum Daily Load (TMDL) development. Discharge from this facility has been included in the Truckee River Total Maximum Daily Load (TMDL) document, approved by the U.S. Environmental Protection Agency April 1994, as a background source.

Low levels of Tetrachloroethylene (PCE), Trichloroethylene (TCE), Freon 112, Methyl tert-butyl ether (MTBE) and 1,2 Dichloroethane (1, 2-DCA ) were detected in the groundwater underlying downtown Reno during a regional groundwater study performed by Simon Hydro-Search, Inc. in November 1991 and EMA in August 1992. Washoe County has created the Central Truckee Meadows Remediation District to address the PCE contamination.

**Receiving Water Characteristics:** The groundwater is discharged to the Truckee River via the stormdrain system. The Truckee River at East McCarran, NAC 445A.186, standards apply for this stream segment. Waters of the Truckee River are of good quality in the segment. Beneficial uses of the Truckee River from Pyramid Lake to the state line are: irrigation; watering of livestock; recreation involving contact with the water; recreation not involving contact with the water; industrial supply; municipal or domestic supply, or both; propagation of wildlife; and propagation of aquatic life. From Idlewild to East McCarran, the aquatic life of major concern are all life stages of mountain whitefish, rainbow trout and brown trout, NAC 445A.183.

The Bureau of Water Quality Planning database does not include recent water quality data for this reach of the River, so data from the upstream monitoring point, Truckee River at Idlewild Park, has been utilized. The River meets all of the NAC 445A.186 water quality standards for beneficial uses. In 2005, the River met the majority of the NAC 445A.186 annual average requirements to maintain existing higher quality (RMHQ) at the upstream monitoring point.

<u>Parameter</u>	<u>RMHQ</u>	<u>2005 Average</u>
pH (SU)	7.0 – 8.5	7 of 12 exceeded RMHQ
Chlorides (mg/L)	7.0 <sup>1</sup>	7.7
Total Phosphates (mg/L)	0.05 <sup>1</sup>	0.024
Ortho Phosphate (mg/L)	0.02 <sup>1</sup>	0.006
Total Nitrogen (mg/L)	0.3 <sup>1</sup>	0.25
Total Dissolved		
Solids (mg/L)	90 <sup>1</sup>	85
Turbidity (NTU)	6.0 <sup>1</sup>	3.5
Fecal Coliform (No./100 ml)	75 <sup>2</sup>	35
Total Suspended		
Solids (mg/L)	15.0 <sup>1</sup>	8.4
Sulfate (mg/L)	7.0 <sup>1</sup>	8.9

Notes:

1. Annual average
2. Annual geometric mean.

**Quantities:** Using the average reported flow, 0.0167 MGD, and the average concentration of constituents of concern from the second quarter 2003 through second quarter 2006 discharge monitoring reports, total nitrogen as nitrogen (TN) 3.6 mg/L and total phosphorus as phosphorus (TP) 0.24 mg/L, the following quantities were calculated: TN 0.50 lbs/day and TP 0.03 lbs/day. These values are well below 1.0 lbs/day and meets the de minimis policy for TN and TP.

The current permit does not require monitoring of total dissolved solids. Since a significant portion of the Truckee River TDS TMDL has not yet been assigned to load allocations or wasteload allocations, the draft permit does not contain a daily TDS load limitation.



**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. Within sixty (60) days of the permit effective date, the Permittee shall submit a revised Operations and Maintenance Manual with site plan detailing locations of sump, piping, and discharge outfall(s) to the Division for review and approval.
- c. Within sixty (60) days of the permit effective date, the Permittee shall submit an analysis of the discharge system capacity and, if the system has inadequate capacity to handle the maximum anticipated flow, a plan and schedule to upgrade the system. These documents must be stamped by a Nevada licensed Professional Engineer.

**Rational for Permit Requirements:** Monitoring is required to assess the quality of the discharge water and to ensure that the extracted groundwater will not impact the beneficial uses of the Truckee River.

Flow: The current permit does not include a flow limit and the Permittee has not completed the flow portion of the permit application. Since the Permittee has paid the permit fees based on a discharge rate of less than 0.050 MGD and there is no treatment system to restrict flow based on design capacity, the draft permit includes a 7-day average flow limit of 0.0495 MGD.

During the last five years the maximum discharge from the facility was 0.0339 MGD in June 2002. From April 2003 through June 2006, the discharge has averaged 0.0167 MGD. The temporary /emergency dewatering discharge flow, three periods over the last five years, was not quantified. This flow volume must now be monitored and discharged to the stormdrain system.

Total Nitrogen as Nitrogen and Total Phosphorus as Phosphorus: The total nitrogen and total phosphorus load limitations are explained in the Quantities section of this fact sheet. The loads are not limited in the current permit.

The current permit does not limit the concentration of these constituents and concentration limits are not proposed in the draft permit.

Total Dissolved Solids: The lack of a total dissolved solids (TDS) load limitation in the draft permit is explained in the Quantities section of this fact sheet. The TDS load is not limited in the current permit.

The NAC 445A.186 standards of water quality include TDS RMHQs of 90.0 mg/L, annual average, and 120.0 mg/L, single value, and a beneficial use standard of 500 mg/L, annual average.

TDS monitoring is not required by the current permit. From February 1982 through November 1982, a total of 21 analyses, the average discharge TDS concentration was 258 mg/L. The Permittee has documented that the local groundwater exceeds the RMHQ values. The shallow groundwater with naturally occurring TDS levels above the RMHQs would flow to the River, if it was not intercepted by the dewatering system, therefore, the TDS RMHQ standard is not applied to this dewatering discharge. Since the groundwater meets the beneficial use standard, the TDS concentration of the discharge is limited to 500 mg/L.

Total Petroleum Hydrocarbons: Monthly analysis for total petroleum hydrocarbons (TPH), EPA SW-846

Method 8015, modified to detect extractable fuel hydrocarbons, was added to the permit September 2, 1998, in response to a recommendation from a site inspection. There have been no TPH detections. Continued TPH monitoring is required due to historic leakage from underground storage tanks (USTs) in downtown Reno, but the measurement frequency has been conditionally reduced to quarterly. If there are any TPH detections in consecutive quarters, the measurement frequency reverts to monthly. After twelve consecutive monthly analyses without detection of TPH in the discharge, the Permittee may resume quarterly TPH analyses.

The City's receiving stormdrain flows pass through an oil/water separator prior to discharge to the Truckee River.

EPA Method 624: Although not detected at high concentrations in the Permittee's discharge, quarterly analysis for volatile organic compounds using EPA Method 624 is proposed to be continued in the draft permit.

Limitations on the Tetrachloroethylene (PCE) and Trichloroethylene (TCE) concentrations in the discharge were added to the draft permit because these compounds have been detected in the dewatering discharge of other properties within the Remediation District.

1,1,1-Trichloroethane (TCA) was detected in the discharge at concentrations of 1.4 µg/L, 1.4 µg/L, 1.5 µg/L, 1.7 µg/L, 2.9 µg/L, and 1 µg/L in March 2000, June 2000, September 2000, February 2002, May 2003 and September 2003, respectively. The NAC 445A.144 municipal or domestic supply TCA standard is 200 µg/L.

Chloroform was detected in the discharge at concentrations of 1.3 µg/L, 3.9 µg/L, 1 µg/L, 3.2 µg/L, and 2.7 µg/L in October 2004, September 2005, November 2005, March 2006, and April 2006, respectively. NAC 445A.144 does not include a chloroform standard, but does include a total trihalomethanes (THM) municipal or domestic supply standard of 100 µg/L. Chloroform is a component of THM. Nevada does not have an aquatic life standard for THM.

Due to the low discharge rate, historical quality of the discharge, proximity of the source to the river (approximately one block) and the discharge of noncontact dewatering water, metals, pH and temperature characterization of the discharge is not required by the draft permit.

**Proposed Determination:** The Division has made the tentative determination to issue the proposed permit for a five (5) year period.

**Procedures for Public Comment:** The Notice of the Division's intent to issue a permit authorizing the Permittee to continue to discharge untreated groundwater to the Truckee River 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 until 5:00 PM December 21, 2006, a period of 30 days following the date of the public notice. 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 of EPA Region IX 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 to accordance with NAC 445A.238.

The final determination of the Administrator may be appealed to the State Environmental Commission pursuant to NRS 445A.238.

November 2006  
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