

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

FACT SHEET

(pursuant to NAC 445A.236)

Applicant: Flamingo Structures LLC
2919 Wilshire Blvd.
Santa Monica, CA 90403

Permit Number: NV0023744

Location: Holiday Inn Las Vegas
4055 Palos Verdes St.
Las Vegas, Clark County, Nevada 89119
Latitude: 36° 06' 56"N, Longitude: 115° 09' 04"W
S15 T21S, R61E MDB&M

Discharge Outfalls:

Outfall 001: Holiday Inn Las Vegas basement collection sumps, combined

Outfall 002: Clark County storm drain system drop inlet, near hotel NE corner

General: The Permittee operates a 129-room hotel, Holiday Inn Las Vegas, at 4055 Palos Verdes St. in Las Vegas, Clark County, Nevada. The Permittee has applied for a National Pollutant Discharge Elimination System (NPDES) permit, NV0023744, to discharge shallow groundwater from two sumps in the basement parking areas to the Flamingo Wash via the Clark County stormdrain system (CCSS).

The facility requires a dewatering system to prevent the basement parking areas from flooding. The discharge point for the dewatering system is located at the northeast corner of the hotel property near the intersection of E. Flamingo and Palos Verdes St (Outfall 002). From the hotel property the groundwater is piped via gravity flow, to the CCSS. Water quality analyses indicate that the pumped groundwater meets State standards set for the Flamingo Wash and Upper Las Vegas Wash (Wash). Therefore no filtering or treatment is required or planned. Annual testing of the discharge water is required in the permit to provide assurance that Wash water quality standards are being met.

Flow: The discharge flow is permitted at a maximum rate of 0.0200 million gallons per day (MGD), but the flow varies seasonally according to the area's water table level and precipitation. Current operational flow is 0.0108 MGD.

Receiving Water Characteristics: Groundwater from the basement sumps will be discharged to the CCSS. The CCSS conveys the water to the Upper Las Vegas Wash via the Flamingo Wash. Water quality standards for the Upper Las Vegas Wash are specified in NAC 445A.199.

The beneficial uses of the Upper Las Vegas Wash, as designated in NAC 445A.198, are propagation of aquatic life, excluding fish; propagation of wildlife; irrigation; recreation not involving contact with water; maintenance of a freshwater marsh; and watering of livestock.

Corrective Actions Sites: There are no Bureau of Corrective Actions (BCA) remediation sites located within a one-mile radius of the permitted facility.

Well Head and Drinking Water Supply Protection: The facility is within 6000', but outside of 3000' of a public water supply. The facility is not within an established Wellhead Protection Area (WPA) or capture zone.

Proposed Effluent Limitations:

Table I. Effluent Limits and Sampling and Monitoring Requirements

Parameters & Units		Discharge Limitations	Sampling Location	Monitoring Frequency	Monitoring Type
Flow ¹	gpm MGD	13.9 0.0200	001	Continuous	Flow meter, calculation
Purgeable & Extractable TPH ²	mg/L	1.0	002	Annually	Discrete
MTBE ³	µg/L	20	002	Annually	Discrete
Benzene	µg/L	5.0	002	Annually	Discrete
Toluene	µg/L	100	002	Annually	Discrete
Ethylbenzene	µg/L	100	002	Annually	Discrete
Total Xylenes	µg/L	200	002	Annually	Discrete
Total Inorganic Nitrogen	mg/L	20	002	Annually	Discrete
Total Phosphorus	lbs/day	1.0	002	Annually	Discrete
pH	S.U.	6.5 - 9.0	002	Annually	Discrete
TDS ⁴	lbs/day	M&R	002	Quarterly	Discrete
Metals ⁵	µg/L	M&R	002	Annually	Discrete

001 = Outfall numbered 001, combined flow from upper and lower basement level sumps.

002 = Outfall numbered 002, on site drop inlet discharge outfall.

1. Monitor and report average gallons per day in MGD quarterly on DMR forms, for Outfall 001.
2. Report full range, C6-C40, analyses with EPA Methods 8015B and 8260B or equivalent methods; report all parameters, including the organics listed below this entry in the Table.
3. Methyl tert-butyl ether.
4. Sample and report TDS load in average lbs/day, quarterly (January, April, July and October).
5. Sample and report total recoverable metals annually in calendar year 4th quarter (January).

gpd: gallons per day
 mg/L: milligrams per liter
 M&R: Monitor and Report
 S.U.: standard pH units
 lbs/day: pounds per day load

TPH: Total Petroleum Hydrocarbons
 µg/L: micrograms per liter
 N: Nitrogen
 TDS: Total Dissolved Solids

Rationale for Permit Requirements: The Division has established the monitoring requirements in Table 1 above to ensure that the receiving water, Flamingo Wash, is not degraded as a result of project activities.

Flow: The rationale for the 30-day average daily discharge was explained in the Flow section of this fact sheet. This requested flow rate is equal to the maximum possible system capacity.

Purgeable and extractable TPH (full range C6-C40): 1.0 mg/L. TPH and Volatile Organic Compounds (VOCs) are not present in the groundwater, but will be tested for annually to ensure compliance with Wash water quality standards. Specific VOCs are noted in the table below the TPH.

Monitor & Report once annually at the Holiday Inn Property drop inlet prior to discharge to the Clark County stormdrain system.

Inorganic Nitrogen: 20 mg/L. Monitor & Report annually.

Phosphorus: 1.0 lbs/day. Monitor & Report annually.

pH: 6.5 - 9.0, standard units. pH is required monitoring per NAC 445A.198 and NAC 445A.199.

TDS: Monitor & Report quarterly. The shallow groundwater with naturally occurring elevated TDS levels would flow to the Wash, if it was not intercepted by the dewatering system. Therefore, the TDS standard is not applied to dewatering discharges in this area. This permit is for the interception and passage of groundwater and thus is exempted under the Colorado River Basin Salinity Control Forum's policy on groundwater interception.

Metals: Monitor & Report annually. In 2006 the Flamingo Wash was placed on the Federal 303(d) list for impaired waters due to Selenium. Annual monitoring of total recoverable metals, including Selenium is required in the permit to assure compliance.

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:

- The Permittee shall achieve compliance with the effluent limitations upon issuance of the permit.
- Within 90 days of the permit effective date (**MM DD, 2010**), the Permittee shall submit to the Division, for review and approval, an updated **Operations & Maintenance (O&M) Manual** for the basement dewatering and discharge system. Before implementing changes to an approved O&M Manual, the Permittee shall submit proposed changes to the Division for review and approval.

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

Procedures for Public Comment: The Notice of the Division's intent to issue a NPDES permit authorizing this facility to discharge into the Flamingo 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 **March 1, 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.

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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: Jeryl R. Gardner, P.E.
Date: January, 2010

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