

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

**Permittee Name:** United States Department of the Interior  
Bureau of Land Management  
Battle Mountain District  
50 Bastian Road  
Battle Mountain, NV 89820

**Permit Number:** NEV2000506

**Location:** Battle Mountain Air Attack Base  
1080 Airport Road  
Battle Mountain, NV 89820

Located 4 mi. Southeast of Battle Mountain, Lander County, Nevada  
Township 32N, Range 45E, NW<sup>1</sup>/<sub>4</sub> of NE<sup>1</sup>/<sub>4</sub> of Section 14  
Latitude: 41° 5' 19" N, Longitude: 114° 42' 39" W

**General:** The Bureau of Land Management (BLM) has applied for a permit renewal. The BLM operates an air tanker base at the Battle Mountain Airport. The air tanker operations typically run each June through September during the area's wildfire season. Base activities include air tanker refueling and the washing of aircraft. Washing removes flame retardant residue accumulated on the aircraft surfaces while operating in retardant drop sites. The flame retardant is washed off the aircraft, collected by gravity flow on the concrete service apron, and then discharged into a ½-acre lined evaporation pond (single 60-mil HDPE). The pond is operated with zero-discharge to the groundwater. Evaporated solids in the pond from the flame retardant components include ammonium polyphosphate, clay, iron oxide, gum thickener, and a corrosion inhibitor. These solids are non-hazardous and periodically removed for disposal in a municipal landfill. The Division has authorized operation of this evaporation pond since November 2000.

**Bureau of Corrective Actions Sites:** There is no Bureau of Corrective Action (BCA) remediation site located within a one-mile radius of the evaporation pond.

**Wellhead Protection Area:** The evaporation pond is not located within a defined drinking water protection area. The nearest public supply well is located four miles away in Battle Mountain.

**Receiving Water Characteristics:** A down-gradient, leak-detection well is installed 75 ft. northeast of the evaporation pond. Depth to the shallow groundwater is 12 ft. The TDS or groundwater salinity level is presently 3,000 mg/l or 3× the allowable standard for drinking water. This elevated salinity level is determined non-potable for domestic supply. Nitrogen monitoring at this well is below the detection limit and the leakage of nutrients (ammonium polyphosphate) has not been found. Also, the monitoring of hydrocarbons in the groundwater is also below the minimum detection levels. Thus, liner leakage has not been detected based on sampling data reported thus far for the past permit term.

**Flow:** The wash-down water is maintained in a 30,000 gallon storage tank, which is refilled from a

supply well. Tank usage, neglecting apron surface evaporation, is estimated to enter the pond for evaporation. In lieu of a flow meter, the pumping time used to refill the tank is reported for the volume of wash-down water discharged into the pond. Over the last five years, discharge events were variable in occurrence and ranged from minimal usage to nearly one tank load being discharged in a day (i.e., 26,000 gallons/day) with the latter event accounting for a system maintenance purge. The daily maximum discharge is limited to 48,000 gallons/day. Average daily usage was always within 300 gallons/day and below the 1,600 gallons/day permit limit.

**Wastewater Analysis:** Wastewater sampling of the effluent at the control (diversion) box included one event in which hydrocarbon was detected at 4.6 mg/l of TPH, presumably from a minor fuel spill, which occurred during aircraft refueling. The base’s BMP plan is to include the use of fuel spill absorbents when any fuel is leaked onto the concrete apron surface. Other parameters sampled in the wastewater (averages reported) included ammonia (1,150 mg/l), phosphate (1,660 mg/l), and TDS (6,550 mg/l) with the latter components due to the flame retardant solids.

**Rational for Permit Requirements:** The limits in Tables 1 (below) and 2 (following page) are proposed for the storage pond and monitoring well. Since the base is open in the spring and summer, the monitoring well is to be sampled quarterly in both the second and third quarters.

**TABLE 1: DISCHARGE LIMITATIONS<sup>1</sup>**

PARAMETERS	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS		
	30-Day Average	Daily Maximum	Sample Location	Measurement Frequency	Sample Type
Wash-Down Water Flow, Gallons per Day	1,600	48,000	Wash-Down Water Tank	Continuous	Pump Timer or Meter
Total Petroleum Hydrocarbons, mg/L (Full-range Purge & Extract – EPA Method 8015B)	-	M&R	Control Box (Effluent)	Quarterly	Discrete
Ammonia, mg/l	-	M&R	Control Box (Effluent)	Quarterly	Discrete
Phosphate, mg/l	-	M&R	Control Box (Effluent)	Quarterly	Discrete
TDS, mg/l	-	M&R	Control Box (Effluent)	Quarterly	Discrete
Pond Freeboard, ft.	≥ 2.0	≥ 2.0	Storage Pond	Monthly	Field Measurement

1. If no wastewater was discharged into the control box throughout the entire quarter, report “No Discharge” for that quarterly monitoring period.

**TABLE 2: GROUNDWATER MONITORING (MW-1)<sup>1</sup>**

PARAMETER	GROUNDWATER LIMITATIONS	MONITORING REQUIREMENTS	
		Measurement Frequency	Sample Type
TDS, mg/L	Monitor & Report	2 <sup>nd</sup> & 3 <sup>rd</sup> Quarter	Discrete
Chlorides, mg/L	Monitor & Report	2 <sup>nd</sup> & 3 <sup>rd</sup> Quarter	Discrete
Nitrate as N, mg/L	Monitor & Report	2 <sup>nd</sup> & 3 <sup>rd</sup> Quarter	Discrete
Total Nitrogen as N, mg/L	10.0	2 <sup>nd</sup> & 3 <sup>rd</sup> Quarter	Discrete
Total Petroleum Hydrocarbons, mg/L (Full-range Purge & Extract – EPA Method 8015B)	1.0	2 <sup>nd</sup> & 3 <sup>rd</sup> Quarter	Discrete
Depth to Groundwater, ft.	Monitor & Report	2 <sup>nd</sup> & 3 <sup>rd</sup> Quarter	Field Measurement
Groundwater Elevation, ft.	Monitor & Report	2 <sup>nd</sup> & 3 <sup>rd</sup> Quarter	Field Measurement

1. Groundwater samples shall be taken only after purging (3) well volumes of groundwater from the monitoring well.

**Schedule of Compliance:** (all compliance deliverables shall be addressed to the attention of the Compliance Coordinator, Bureau of Water Pollution Control):

- Within thirty (30) days of the permit renewal date (by **XX/XX/XXXX**) the Permittee shall submit an updated copy of the facility's storage pond Operations & Maintenance (O&M) Manual, prepared in accordance with NDEP Water Technical Sheet No. WTS-2: *Minimum Information Required for an Operation and Maintenance Manual*. If no operational changes to the O&M procedures have occurred in the past five years, the Permittee shall reply in writing to the Division by the above due date and inform of its no change condition.

**Procedures for Public Comment:** The Notice of the Division's intent to renew discharge permit NEV2000506, subject to the conditions contained within the permit is being sent to the **Battle Mountain Bugle** and **Reno Gazette-Journal** newspapers for publication. The notice is also being electronically mailed to all interested persons requesting listing on our public notification mailing list. Anyone wishing to comment on the proposed permit can do so in writing within a period of thirty (30) calendar days of the date of publication of the public notice in the newspapers. 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 **Friday, March 25, 2011, by 5:00 P.M. PST.**

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 renew discharge permit NEV2000506 for a five-year permit term.

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Bureau of Water Pollution Control

Date: February 18, 2011