



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

FACT SHEET (pursuant to NAC 445A.236)

Applicant: Sierra Development Company dba Club Cal Neva
P.O. Box 2071
Reno, NV 89505

Permit Number: NV0021067

Facility Location: Nevadan Hotel
133 N. Virginia Street
Reno, Washoe County, Nevada
NW ¼ SE1/4 Section 11, T19N R19E
Latitude: 39° 31' 34.21" N, Longitude: 119° 48' 48.37" W

Discharge Outfall: The water is collected in a system of sumps, connected to a discharge piping system, and conveyed to the Truckee River via the City of Reno storm drain system at one outfall:

**001: Storm drain drop inlet in Fulton Alley behind hotel, near 1st St
Latitude: 39° 31' 34" N, Longitude: 119° 48' 49.26" W**

Flow: 0.0495 million gallons per day (MGD) 7-day average.

General: The Permittee has applied for renewal of a National Pollutant Discharge Elimination System (NPDES) permit to continue to discharge untreated groundwater from a basement sump at 133 N. Virginia St. to the Truckee River via the City of Reno storm drain system. A NPDES Permit for this discharge was first issued in 1977 to the Onslow Hotel and Casino for a discharge of 0.0072 MGD. The permit was transferred in 1999 to the Riverboat Hotel and Casino to include dewatering from 34 W. Second Street. In 2004 the permit was transferred to Sierra Development Company dba Club Cal Neva, and the property was renamed as the Nevadan Hotel.

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 two floors below street level. The sump has a concrete berm with an effective height of approximately eight inches, to exclude spilled fluids; it 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 unmetereed pump during high flows with discharge to the alley. This has occurred only once during the last ten years -due to an extreme flooding event.

The flow rate in the permanent discharge line is recorded by a totalizing 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 former temporary sump/outfall for managing high volume flood events has been removed, and was not part of the previous permit. The previous permit continued designating an outfall number for the flow meter on the permanent discharge line. This renewal removes that outfall designation, but flow is still measured at the flow meter on the discharge line prior to discharge to the storm drain system drop inlet (Outfall 001). Water quality samples are obtained from the combined discharges to the sump at the sump discharge line, also prior to discharge to Outfall 001.

Prior to the 1996 permit renewal, only flow, settleable solids, TDS, turbidity, pH, and oil and gas (O&G) required monitoring. Since 1996, the permit has also required monitoring of volatile organic compounds using EPA Method 624, total nitrogen as N, total phosphorus, and O&G was replaced by total petroleum hydrocarbons, SW-846 Method 8015, in 1998. The discharge is untreated based on a lack of organic contamination, validated by data collected since 1996.

Corrective Actions Sites: There are twenty-two hydrocarbon remediation sites managed by the NDEP Bureau of Corrective Actions, located within a one-mile radius of the facility. The case officers have stated that the remediation activities will not impact or be impacted by the dewatering and discharge.

Receiving Water Characteristics: The groundwater is discharged to the Truckee River via the City of Reno storm drain system. The Truckee River at E. McCarran, NAC 445A.1684, 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 include 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. Within the Truckee River reach 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.1622.

TMDL: 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. De minimis waste load allocations of 1.0 pound per day each for TN and TP have been assigned to the discharge from this facility. No waste load allocation has been assigned for TDS, although TDS is also a TMDL constituent.

Discharge Flow and Characteristics: During the period from January 2007 through April 2012, the following discharge characteristics were reported in the quarterly Discharge Monitoring Reports:

Table 1. Discharge Water Quality Data from January 2007 through April 2012

Parameter		Permit Limit	Average	Maximum	Minimum	# of Exceedances
Flow	30-Day Avg (MGD)	0.0495	.0333	.0480	.0074	0
TDS	Quarterly (mg/l)	500	334	710	230	1
TDS	Quarterly (lb/day)	M&R	91	136	14	0
TN	Quarterly (mg/l)	M&R	2.7	4.3	1.3	0
TN	Quarterly (lb/day)	1.0	.74	1.43	.12	5
TP	Quarterly (mg/l)	M&R	.15	.19	.12	0
TP	Quarterly (lb/day)	1.0	.04	.06	.01	0
TPH (8015B)	Quarterly (mg/l)	1.0	ND	ND	ND	0
VOC (624)	Quarterly (µg/l)	M&R	ND	ND	ND	0

Discharge Limitations and Requirements: Representative discharge samples and measurements taken in compliance with the monitoring requirements specified in Table 2 shall be taken prior to discharge to the storm drain system.

The discharge shall be limited and monitored by the Permittee as specified below:

Table 2. Discharge Limitations, Sampling and Monitoring Requirements

Parameters	Units	Discharge Limits		Monitoring Requirements		
		30-Day Average	Daily Maximum	Sampling Locations	Monitoring Frequency	Monitoring Type
Discharge Rate ¹	MGD	0.0495 ¹	M&R	001	Daily	Flow meter
TDS ²	mg/l	500	---	001	Quarterly	Discrete
TDS ²	ppd	M&R	---	001	Quarterly	Calculation
TN ²	mg/l	---	M&R	001	Quarterly	Discrete
TN ²	ppd	1.0	---	001	Quarterly	Calculation
TP ²	mg/l	---	M&R	001	Quarterly	Discrete
TP ²	ppd	1.0	---	001	Quarterly	Calculation
TPH ³	mg/l	---	1.0	001	Quarterly	Discrete
VOC ⁴	µg/l	---	M&R	001	Annually	Discrete

Definitions and Footnote Explanations are provided in Table 3.

Table 3. Table Definitions and Footnote Explanations

Term/ Footnote	Definitions/ Explanations
MGD	million gallons per day
TDS	Total Dissolved Solids
mg/l	milligrams per liter
ppd	pounds per day
M&R	Monitor and Report
TN	Total Nitrogen as Nitrogen

TP	Total Phosphorus as Phosphorus
TPH	Total Petroleum Hydrocarbons, purgeable and extractable, full range C ₆ -C ₄₀ .
VOC	Volatile Organic Compounds: sample and analyze for all VOC using Method 624 once per quarter. For those parameters with detectable concentrations report on separate rows, individually.
Footnote 1	Monitor daily and report quarterly the 7-day average discharge.
Footnote 2	Sample and analyze quarterly. Report concentration in mg/l and calculate mass load in ppd; report on quarterly DMRs. Pounds/day = Concentration (mg/l) x Flow (MGD) x 8.34.
Footnote 3	Sample and analyze for purgeable and extractable TPH quarterly and report on quarterly DMRs. Analyze using Method 8015B.
Footnote 4	Sample and analyze VOC annually and report on 4 th quarter DMR. Report all compounds with detectable concentrations individually. Analyze using Method 624.

Rationale 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: 7-day average flow limit of 0.0495 MGD.

TDS: The lack of a total dissolved solids (TDS) load limitation in the draft permit is explained below and in the TMDL section of this fact sheet. The TDS load is not limited in the current permit.

The NAC 445A.1684 standards of water quality include TDS Requirements to Maintain Existing Higher Quality (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.

TN as N: The current permit does not limit the concentration of TN and concentration limits are not proposed in the draft permit. The total nitrogen and total phosphorus load limitations are explained in the TMDL section of this fact sheet. The assigned “de minimis” load of 1.0 pound per day is unchanged from the previous permit.

TP as P: The current permit does not limit the concentration of TP and concentration limits are not proposed in the draft permit. The total nitrogen and total phosphorus load limitations are explained in the TMDL section of this fact sheet. The assigned “de minimis” load of 1.0 pound per day is unchanged from the previous permit.

TPH: 1.0 mg/l. Sampling and analysis is required quarterly, utilizing EPA Method 8015B to include purgeable and extractable hydrocarbons. During the previous permit cycle (2007-2011) there have not been any TPH detections in the discharge. Continued TPH monitoring is required due to historic leakage from underground storage tanks (USTs) in downtown Reno, but the measurement frequency is proposed to be conditionally reduced to quarterly. If there are any TPH detections in consecutive quarters, the measurement frequency may be increased in the next permit cycle.

VOC: A few VOC were detected in the discharge between 2000 and 2006, but have not been detected since. The previous permit included permit limitations and specific analytical reporting for Tetrachloroethene (PCE), Trichloroethene (TCE), 1,1,1-Trichloroethane (TCA), Chloroform, and Total Trihalomethanes (THM) because they had been detected previously at low concentrations. Since they have not been detected since 2006, specific reporting of those VOC is not required by this renewal permit. VOC analyses are still required annually by the permit. If these or other specific VOC are detected during this permit timeframe, then those compounds may be required to be reported separately and analyzed more frequently than annually in the next permit cycle.

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 discharge limitations upon issuance of the permit.
- Within 90 days of permit issuance (By **MM DD, 2012**) the Permittee shall submit to the Division, for review and approval, an updated Operations and Maintenance (O&M) Manual. If no updates or revisions are required, the Permittee shall submit a letter by the above due date stating that there have been no changes to the previously approved O&M Manual.

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

Procedures for Public Comment: The Notice of the Division's intent to re-issue a NPDES permit for a five-year period, authorizing this facility to discharge to the Truckee River via the City of Reno storm drain system, 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 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 **September 24, 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.

Prepared by: Jeryl R. Gardner, P.E.
Date: August 2012