



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

FACT SHEET (pursuant to NAC 445A.236)

Applicant: Washoe County Department of Public Works
P.O. Box 11130
Reno, NV 89520-0027

Permit Number: NV0024163

Location: Washoe County Public Works Maintenance Facility
1502 Washington St.
Reno, NV 89520
Latitude: 39° 32' 40.83" N, Longitude: 119° 49' 35.15" W
Section 3, T19N, R19E MDB&M

Discharge Outfall: **Outfall 001:** City of Reno storm drain drop inlet on west side of Sierra St., north of Putnam Drive
Latitude: 39° 32' 44.98" N **Longitude: 119° 49' 18.95" W**

General: The Applicant has applied for a new National Pollutant Discharge Elimination System (NPDES) permit, NV0024163, to discharge treated groundwater to the Truckee River via a drainage ditch and the City of Reno storm drain system.

The Applicant owns and operates a maintenance facility at 1502 Washington St., in Reno, Washoe County, Nevada. The site is impacted with Total Petroleum Hydrocarbons (TPH) and Volatile Organic Compounds (VOC), specifically Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX), and Methyl tert-butyl ether (MTBE). Four on-site pumping wells will convey flow to the treatment system. Groundwater remediation is accomplished using an air stripper, and two aqueous phase granular activated carbon adsorption vessels in series, which remove TPH, BTEX, MTBE, and other VOC from the impacted groundwater. The treated water will be pumped to a drainage ditch which flows to the nearest City of Reno storm drain system box culvert, located on the west side of Sierra Street, north of Putnam Drive. Sampling and analysis of the pre-treatment influent (contaminated groundwater), mid-point (between carbon canisters) location, and post-treatment effluent discharge is required for TPH, BTEX, MTBE and other VOC. Monitoring of the discharge is conducted to ensure that surface waters are not degraded as a result of the discharge.

Flow: The treatment system's maximum daily discharge will be 15 gallons per minute (gpm) and will be permitted at 0.022 MGD.

Discharge Characteristics: Overall, the groundwater to be discharged is anticipated to be of good quality. Data from similar treatment systems indicates that TPH, BTEX, MTBE and other VOC will be removed below NDEP action levels prior to discharge.

Receiving Water Characteristics: Groundwater from the remediation system is discharged to

the Truckee River via a nearby drainage ditch, and the City of Reno storm drain system. Water quality standards for the Truckee River beneficial uses designated in NAC 445A.183, are specified in NAC 445A.186.

Site Groundwater: Within the project area the groundwater elevation is approximately 50 feet below ground surface. The local groundwater flow direction is southeast.

Corrective Actions Sites: There is one other remediation site within a one-mile radius of this remediation site. The case officers do not expect the nearby remediation activities to be impacted by the proposed pump and treat activities, and discharge from this site.

Well Head and Drinking Water Supply Protection: The facility is not within 6000' of a public water supply. A Wellhead Protection Area (WPA) has not been established for this area.

Proposed Discharge Limitations and Special Conditions: The water discharged from the groundwater remediation system to the City of Reno storm drain system shall be limited, sampled and monitored by the Permittee as specified below.

Discharge samples and measurements taken in compliance with the monitoring requirements specified below shall be taken prior to discharge to the storm drain drop inlet, at the following locations:

- a. The sample port on the inlet line to the first carbon canister;
- b. The sample port on the discharge line from the first activated carbon vessel, prior to discharge to the second activated carbon vessel; and
- c. The sample port on the discharge line of the second carbon vessel, prior to discharge to the drainage ditch.

Proposed Discharge Limits: Specific sampling and monitoring requirements are provided in Table 1.

Table 1. Discharge Limitations, Sampling and Monitoring Requirements

Parameters	Units	Discharge Limitations		Monitoring Requirements		
		30-Day Average	Daily Maximum	Sampling Locations	Monitoring Frequency	Monitoring Type
Discharge Rate ¹	MGD	M&R	0.022	c	Continuous	Flow meter
TPH ²	mg/l	---	M&R	a, b	Quarterly	Discrete
		---	1.0	c		
Benzene ²	µg/l	---	M&R	a, b	Quarterly	Discrete
		---	5	c		
Toluene ²	µg/l	---	M&R	a, b	Quarterly	Discrete
		---	100	c		
Ethylbenzene ²	µg/l	---	M&R	a, b	Quarterly	Discrete
		---	100	c		
Total Xylenes ²	µg/l	---	M&R	a, b	Quarterly	Discrete
		---	200	c		

Methyl tert-butyl ether (MTBE) ²	µg/l	---	M&R	a, b	Quarterly	Discrete
		---	20	c		
Carbon ³	lbs	---	M&R	Each vessel	Event	Discrete
Profile I ⁴	mg/l	---	M&R	c	Annually	Discrete
VOC ⁵	µg/l	---	M&R	c	Annually	Discrete

Table Definitions and Footnote Explanations are provided in Table 2.

Table 2. Table Definitions and Footnote Explanations

Term/ Footnote	Definitions/ Explanations
MGD	Million gallons per day
M&R	Monitor and report
TPH	Total Petroleum Hydrocarbons, purgeable and extractable, full range C ₆ -C ₄₀ . Sample and analyze, and report quarterly. Analyze using EPA Method 8015B.
mg/l	milligrams per liter
µg/l	micrograms per liter
Carbon	Mass of activated carbon, in lbs. Track activated carbon addition and advancement as it occurs and report date and mass on applicable DMR.
Profile I	Full suite of Nevada Profile I parameters; report individually on DMR forms. Metals shall be total, recoverable. Sample and analyze annually and report on 4 th quarter DMR.
VOC	Volatile Organic Compounds. Report all compounds with detectable concentrations, individually on DMR forms. Sample and analyze annually and report on 4 th quarter DMR.
Footnote 1	Monitor daily and record maximum daily discharge in MGD, and report quarterly. Discharge shall be monitored at the flow meter between the last carbon canister and the discharge to the ditch.
Footnote 2	TPH, BTEX (benzene, toluene, ethylbenzene, and total xylenes), and MTBE. Sample and analyze quarterly and report on quarterly DMR forms. Sample influent (a), midpoint between canisters (b), and effluent (c). Influent and midpoint are M&R; effluent has specific limits.
Footnote 3	Mass of activated carbon, in lbs. Track activated carbon addition and advancement as it occurs and report date and mass on applicable DMR.
Footnote 4	Full suite of Nevada Profile I parameters; report individually on DMR forms. Metals shall be total, recoverable. Sample and analyze annually and report on 4 th quarter DMR.
Footnote 5	Volatile Organic Compounds. Report all compounds with detectable concentrations, individually on DMRs. Sample and analyze annually and report on 4 th quarter DMR.

Rationale for Permit Requirements: The monitoring requirements and permit limits have been established to ensure that the receiving waters are not degraded from the discharge of the treated groundwater. The requirements are consistent with similar groundwater remediation system discharge permits.

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 two copies of an Operations and Maintenance Manual, to the Division for review and approval, prepared in accordance with applicable sections of *WTS-2 Minimum Information Required for an Operation and Maintenance Manual for a Wastewater Treatment Plant*.
- The Permittee shall notify the Division in writing within 14 days of initiating discharge.

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

Procedures for Public Comment: The Notice of the Division's intent to issue a new 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 **March 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.

Prepared by: Jeryl R. Gardner, P.E.
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