FACTSHEET
(pursuant to NAC 445A.236)

Permittee Name: TA OPERATING, LLC DBA TRAVEL CENTERS OF AMERICA

6000 E. FRONTAGE ROAD
MILL CITY, NV 89418

Permit Number: NS0090016

Permit Type: GROUNDWATER DISCHARGE

Designation: GROUNDWATER

New/Existing: EXISTING

Location: MILL CITY TRAVEL CENTER, PERSHING
6000 E. FRONTAGE ROAD, MILL CITY, NV 89418
LATITUDE: 40.693056, LONGITUDE: -118.055833
TOWNSHIP: T33N, RANGE: R35E, SECTION: S33

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Latitude	Longitude	Receiving Water
001	EFFLUENT DISCHARGE	External Outfall		40.691111	-118.059167	GROUNDWATER
002	5,000 GALLON OIL/WATER SEPARATOR	External Outfall		40.694444	-118.056389	GROUNDWATER
INF	INFLUENT STRUCTURE	Influent Structure		40.691389	-118.058333	N/A
MW1	MONITORING WELL 1	Monitoring Well	71637	40.690278	-118.06	GROUNDWATER
MW2	MONITORING WELL 2	Monitoring Well		40.690833	-118.061944	GROUNDWATER
MW3	MONITORING WELL 3	Monitoring Well		40.691667	-118.06	GROUNDWATER
MW4	MONITORING WELL 4	Monitoring Well		40.689444	-118.059722	GROUNDWATER
RB1	RIB 1	External Outfall		40.691111	-118.059167	GROUNDWATER
RB2	RIB 2	External Outfall		40.691111	-118.059167	GROUNDWATER
RB3	RIB 3	External Outfall		40.691111	-118.059167	GROUNDWATER
RB4	RIB 4	External Outfall		40.691111	-118.059167	GROUNDWATER

Permit History/Description of Proposed Action
The Permittee, TA Operating, LLC dba Travel Centers of America, has applied for the renewal of Permit NS0090016 for the Ashbrook Simon-Hartley activated sludge package wastewater treatment plant at their Mill City Travel Center (MCTC), at 6000 E. Frontage Road, in Mill City, being within Pershing County, Nevada. The Permittee proposes to continue to discharge treated wastewater to groundwaters of the State via four (4) rapid infiltration basins (RIBs).

This permit was first issued on June 26, 1990. The most recent permit was issued on July 12, 2013, and expired on July 11, 2018; the permit has been administratively continued since.

Facility Overview
The TA owns and operates an Ashbrook Simon-Hartley activated sludge package wastewater treatment plant at their MCTC location. The MCTC includes a vehicle fueling station, vehicle repair shop, convenience store, casino, and restaurant. The package treatment plant is designed to treat and denitrify an average of

0.025 million gallons per day (Mgal/d) of wastewater, up to a peak flow rate of 0.10 Mgal/d.

The influent wastewater goes through a bar screen vault for removal of debris and is raked out periodically. Once screened, the influent wastewater is then pumped to a lift station equipped with dual pumps. The influent wastewater then enters the digester and goes through the pre-anoxic mixer for denitrification, then off to aeration for biochemical oxygen demand (BOD) removal, and into the clarifier for separation. Mixed liquor suspended solids are returned from the aeration tank back to the pre-anoxic tank. From there, flow goes to the post-anoxic zone which acts as an additional denitrification since most rural travel centers have high nitrogen strength wastewater. Discharge from the post-anoxic tank flows to a final clarifier, after which the effluent from the clarifier is discharged to a final dosing tank, where it is pumped to surface disposal in rapid infiltration basins (RIBs). Because the effluent is discharged to RIBs, the facility does not implement chlorine disinfection. The sludge from the final clarifier is returned to the sludge holding tank (digester). Sludge is wasted twice per year, and the digester sludge is removed by a local septic pumper.The MCTC plant was built to control nitrates in the groundwater. Nitrates were the result of two sources:
1. Puckerbrush (pop. 23) - Individual septic systems for employees - septic systems now abandoned and residence trailers removed.
2. Former lagoons - Treatment lagoons had leaked and were replaced with the Ashbrook wastewater treatment plant.

In addition to the treatment plant, the MCTC site operates a 5,000-gallon oil/water separator (OWS). This system discharges to its own dedicated percolation/evaporation ditch. In 1997, MCTC abandoned a 500-gallon modified stormwater collection sump. The OWS is a 3-compartment separator and receives rainwater runoff from the drop inlets at the service station, scale pad, and fueling area. MCTC pumps out the OWS once per year. NDEP inspected the OWS last year (2024), and its maintenance appeared deficient. Another inspection is planned. The fueling island drop inlets are also designed to capture spillage of diesel and gasoline product and route the hydrocarbons to the OWS where it can be pumped and recycled.

Outfall Summary
Outfall INF – This internal outfall is where influent enters the treatment plant.

Outfall 001 – This external outfall is for measuring the effluent discharge into one of the four RIBs.

Outfall 002 – This external outfall is for measuring the wastewater discharged by the oil/water separator (OWS), being a separate system that discharges into a dedicated percolation/evaporation ditch separate from the four RIBs.

Outfall MW1 – This downgradient monitoring well is for the measurement of Chloride, Depth to groundwater, Nitrogen, and Total Dissolved Solids (TDS).

Outfall MW2 - This downgradient monitoring well is for the measurement of Chloride, Depth to groundwater, Nitrogen, and TDS. MW2 is downgradient from MW1, MW3, and MW4. The topography in the area slopes towards the Humboldt River in a northwesterly direction.

Outfall MW3 - This downgradient monitoring well is for the measurement of Chloride, Depth to groundwater, Nitrogen, and TDS.

Outfall MW4 - This downgradient monitoring well is for the measurement of Chloride, Depth to groundwater, Nitrogen, and TDS.

Outfall RB1 - This external outfall is to allow for the reporting of freeboard at RIB 1.

Outfall RB2 - This external outfall is to allow for the reporting of freeboard at RIB 2.

Outfall RB3 - This external outfall is to allow for the reporting of freeboard at RIB 3.

Outfall RB4 - This external outfall is to allow for the reporting of freeboard at RIB 4.

Facility Upgrades since last issued permit
Since the last permit was issued, an emergency bypass was added for when a lift station failure occurs. If the effluent lift station fails, the flow goes to RIB 1.

Solids Handling
For the Ashbrook Simon-Hartley activated sludge package wastewater treatment plant, sludge is wasted twice per year, and the digester sludge is removed by a local septic pumper.

For the OWS, the TA pumps the system out once a year.

Effluent Management and Reuse
The effluent is discharged via Outfall 001 into one of the four RIBs for percolation and evaporation. There is no reuse.

Design Flow (and basis) and Measurement & Current Capacity
The Ashbrook Simon-Hartley activated sludge package wastewater treatment plant was designed with an average day flow rate of 0.025 MGD and a peak flow (daily maximum) flow rate of 0.10 Mgal/d.

The permitted daily maximum was 0.035 Mgal/d, with an average of 5,772 gallons per day reported during the December 2019 to November 2024 period.

Pretreatment Program
The facility, itself, does not meet the federal Environmental Protection Agency's (EPA's) guidelines requiring them to have a pretreatment program. Pretreatment actions are limited to utilization of a bar screen to remove any large objects along with aeration for BOD.

Operations & Maintenance (O&M) Manual status
The TA's O&M Manual was last reviewed and approved on January 25, 2018. The Technical, Compliance, and Enforcement Branch of the Bureau of Water Pollution Control requires O&M Manuals be updated every two (2) permit cycles which equates to every ten (10) years, with the next update due on January 25, 2028. The O&M manual shall follow the Division's guidance document, WTS2 Minimum Information Required for an Operation and Maintenance Manual for a Wastewater Treatment Plant and be prepared and wet stamped by a licensed, qualified Nevada engineer (P.E.). Additional requirements may be added based on site observations and concerns, the Division should be contacted prior to any future submittal to ensure all requirements are added to the document.

Effluent Characterization
Nevada State Network Discharge Monitoring Report (NetDMR) data, as reported from December 2019 to November 2024, was reviewed as part of the permit renewal process. The following average levels of pollutants and depth were reported.

Acronyms:
mg/L = Milligrams per Liter
SU = Standard Units
BOD = Biochemical Oxygen Demand
TDS = Total Dissolved Solids
TSS = Total Suspended Solids

Outfall 001:
BOD, 5-day: 9.53 mg/L
Nitrogen, total: 7.45 mg/L
pH: 7.97 SU

TSS: 14.84 mg/L

Outfall 002 (only the Year 2020 had a reported discharge):
Arsenic: 0.004 mg/L
Benzene: Below Detectable Levels
Cadmium: 0.002 mg/L
Chlorobenzene: Below Detectable Levels
Chromium: 0.005 mg/L
Ethylbenzene: 0.0022 mg/L
Hydrocarbon, total petroleum: 16 mg/L
Lead, total: 0.004 mg/L
Methyl tert-butyl ether: Below Detectable Levels
Methyl Chloride: Below Detectable Levels
Tetrachloroethylene: Below Detectable Levels
Toulene: Below Detectable Levels
Trichloroethylene: Below Detectable Levels
Xylene: 0.017 mg/L

Outfall MW1:
Chloride: 502.63 mg/L
Depth to Water Level: 92.78 Feet
Nitrogen: 14.07 mg/L
TDS: 1808.95 mg/L

Outfall MW2:
Chloride: 562.84 mg/L
Depth to Water Level: 84.90 Feet
Nitrogen: 11.68 mg/L
TDS: 1813.16 mg/L

Outfall MW3:
Chloride: 435.32 mg/L
Depth to Water Level: 88.10 Feet
Nitrogen: 9.98 mg/L
TDS: 1748.42 mg/L

Outfall MW4:
Chloride: 375.58 mg/L
Depth to Water Level: 77.84 Feet
Nitrogen: 5.77 mg/L
TDS: 1820 mg/L

Pollutants of Concern
Pollutants of concern are any pollutants or parameters that are believed to be present in the discharge and could affect or alter the physical, chemical, or biological condition of the receiving water. Common pollutants of concern are:

Treatment Plant: BOD, pH, total nitrogen, and TSS.

Monitoring Wells: Chloride, total nitrogen, and TDS are monitored at each well.

Oil/Water Separator - Arsenic, cadmium, chromium, lead, benzene, chlorobenzene, ethylbenzene, methylene chloride (dichloromethane), trichloroethylene (TCE), toluene, perchloroethylene or tetrachloroethylene (PCE), and xylene.

Along with Methyl tert-butyl ether (MTBE) and total petroleum hydrocarbons (TPH) expected to be present

at the vehicle fueling facility.

Receiving Water
The receiving water is groundwater of the State. Depth to groundwater in the area ranges between 77 to 93 feet below ground surface. No adverse effects are expected with discharge of this wastewater.

Compliance History
The facility was in substantial compliance during the December 2019 through November 2024 reporting period.

Proposed Effluent Limitations
The discharge shall be limited and monitored by the Permittee as specified below.

WWTP Discharge Limitations Table for Sample Location Inf (Influent Structure) To Be Reported Monthly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Flow rate	Daily Maximum	<= 0.0325 Million Gallons per Day (Mgal/d)		Raw Sewage Influent	INF	Continuous	METER
Flow rate	30 Day Average	<= 0.025 Million Gallons per Day (Mgal/d)		Raw Sewage Influent	INF	Continuous	METER

WWTP Discharge Limitations Table for Sample Location Inf (Influent Structure) To Be Reported Quarterly[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
BOD, 5-day	Daily Maximum		M&R Milligrams per Liter (mg/L)	Raw Sewage Influent	INF	Quarterly	DISCRT
BOD, 5-day	Quarterly Average		M&R Milligrams per Liter (mg/L)	Raw Sewage Influent	INF	Quarterly	DISCRT
Solids, total suspended	Daily Maximum		M&R Milligrams per Liter (mg/L)	Raw Sewage Influent	INF	Quarterly	DISCRT
Solids, total suspended	Quarterly Average		M&R Milligrams per Liter (mg/L)	Raw Sewage Influent	INF	Quarterly	DISCRT

Notes (WWTP Discharge Limitations Table):

1. Influent should be sampled concurrently with treated effluent to determine true percentage of removal rates.

Groundwater Monitoring Wells Table for Sample Location Mw1 (Downgradient Monitoring Well) To Be Reported Quarterly

	Discharge Limitations			Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT
Depth to water level ft below landsurface[1]	Daily Minimum	M&R Feet (ft)		Groundwater	MW1	Quarterly	VISUAL
Nitrogen, total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT
pH	Value		M&R Standard Units (SU)	Groundwater	MW1	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT
Water level relative to mean sea level[2]	Daily Maximum	M&R Feet (ft)		Groundwater	MW1	Quarterly	CALCTD

Notes (Groundwater Monitoring Wells Table):

1. Depth to groundwater.
2. Groundwater elevation above mean sea level (AMSL).

Groundwater Monitoring Wells Table for Sample Location Mw2 (Downgradient Monitoring Well) To Be Reported Quarterly

	Discharge Limitations			Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT
Depth to water level ft below landsurface[1]	Daily Minimum	M&R Feet (ft)		Groundwater	MW2	Quarterly	VISUAL
Nitrogen, total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT
pH	Value		M&R Standard Units (SU)	Groundwater	MW2	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT
Water level relative to mean sea level[2]	Daily Maximum	M&R Feet (ft)		Groundwater	MW2	Quarterly	CALCTD

Notes (Groundwater Monitoring Wells Table):

1. Depth to groundwater.
2. Groundwater elevation above mean sea level (AMSL).

Groundwater Monitoring Wells Table for Sample Location Mw3 (Downgradient Monitoring Well) To Be Reported Quarterly

	Discharge Limitations			Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT
Depth to water level ft below landsurface[1]	Daily Minimum	M&R Feet (ft)		Groundwater	MW3	Quarterly	VISUAL
Nitrogen, total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT
pH	Value		M&R Standard Units (SU)	Groundwater	MW3	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT
Water level relative to mean sea level[2]	Daily Maximum	M&R Feet (ft)		Groundwater	MW3	Quarterly	CALCTD

Notes (Groundwater Monitoring Wells Table):

1. Depth to groundwater.
2. Groundwater elevation above mean sea level (AMSL).

Groundwater Monitoring Wells Table for Sample Location Mw4 (Downgradient Monitoring Well) To Be Reported Quarterly

	Discharge Limitations			Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW4	Quarterly	DISCRT
Depth to water level ft below landsurface[1]	Daily Minimum	M&R Feet (ft)		Groundwater	MW4	Quarterly	VISUAL
Nitrogen, total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW4	Quarterly	DISCRT
pH	Value		M&R Standard Units (SU)	Groundwater	MW4	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW4	Quarterly	DISCRT
Water level relative to mean sea level[2]	Daily Maximum	M&R Feet (ft)		Groundwater	MW4	Quarterly	CALCTD

Notes (Groundwater Monitoring Wells Table):

1. Depth to groundwater.
2. Groundwater elevation above mean sea level (AMSL).

NS OTHER - Discharge Limitations Table for Sample Location 002 (Oil/Water Separator External Outfall) To Be Reported Annually[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Arsenic, total (as As)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
Barium, total (as Ba)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
Benzene	Daily Maximum		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
Cadmium, total (as Cd)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
Chlorobenzene	Daily Maximum		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
Chromium, total (as Cr)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
Ethylbenzene	Daily Maximum		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
Hydrocarbons, total petroleum[2]	Daily Maximum		<= 15 Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
Lead, total (as Pb)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
Methyl tert-butyl ether	Daily Maximum		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
Methylene chloride	Daily Maximum		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
			M&R	Other			

NS OTHER - Discharge Limitations Table for Sample Location 002 (Oil/Water Separator External Outfall) To Be Reported Annually[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Tetrachloroethylene	Daily Maximum		Milligrams per Liter (mg/L)	Treatment, Process Complete	002	Annual	DISCRT
Toluene	Daily Maximum		<= 1 Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
Trichloroethylene	Daily Maximum		M&R Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT
Xylene	Daily Maximum		<= 1 Milligrams per Liter (mg/L)	Other Treatment, Process Complete	002	Annual	DISCRT

Notes (NS OTHER - Discharge Limitations Table):

1. Obtain and analyze at least one (1) sample from the 5,000-gallon oil/water separator each year and report in the 4th quarter with the annual report.
2. Analyze and report the full range of purgeable and extractable hydrocarbons using method 8015B.

Ponds / Rapid Infiltration Basins for Sample Location 001 (Effluent Discharge-External Outfall) To Be Reported Quarterly[4]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
BOD, 5-day	Daily Maximum		<= 45 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
BOD, 5-day	Quarterly Average		<= 30 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
BOD, 5-day, percent removal[2]	Quarterly Minimum[3]		>= 85 Percent (%)	Effluent Gross	001	Quarterly	CALCTD
Nitrogen, total	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
pH, maximum	Maximum Value		<= 8.5 Standard Units (SU)	Effluent Gross	001	Quarterly	DISCRT
pH, minimum	Minimum Value		>= 6.5 Standard Units (SU)	Effluent Gross	001	Quarterly	DISCRT
Solids, total suspended	Daily Maximum		<= 45 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Solids, total suspended	Quarterly Average		<= 30 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Solids, suspended percent removal[2]	Quarterly Minimum[3]		>= 85 Percent (%)	Effluent Gross	001	Quarterly	CALCTD

Notes (Ponds / Rapid Infiltration Basins):

2. Both BOD5 and TSS treated effluent should be sampled concurrently with influent to determine actual percentage of removal rates achieved by the plant.
3. This should based on a Quarterly Average Minimum.
4. Effluent should be measured at outlet to the rapid infiltration basin (RIB) being actively discharged to.

Ponds / Rapid Infiltration Basins for Sample Location 001 (Effluent Discharge-External Outfall) To Be Reported Once During The Permit Term[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Alkalinity, bicarbonate (as CaCO3)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Alkalinity, total (as CaCO3)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Aluminum, total (as Al)	Daily Maximum		<= 0.2 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Antimony, total (as Sb)	Daily Maximum		<= 0.006 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Arsenic, total (as As)	Daily Maximum		<= 0.01 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Barium, total (as Ba)	Daily Maximum		<= 2 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Beryllium, total (as Be)	Daily Maximum		<= 0.004 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Cadmium, total (as Cd)	Daily Maximum		<= 0.005 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Calcium, total (as Ca)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Chloride (as Cl)	Daily Maximum		<= 400 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Chromium, total (as Cr)	Daily Maximum		<= 0.1 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
			<= 1				

Ponds / Rapid Infiltration Basins for Sample Location 001 (Effluent Discharge-External Outfall) To Be Reported Once During The Permit Term[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Copper, total (as Cu)	Daily Maximum		Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Fluoride, total (as F)	Daily Maximum		<= 4 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Iron, total (as Fe)	Daily Maximum		<= 0.6 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Lead, total (as Pb)	Daily Maximum		<= 0.015 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Magnesium, total (as Mg)	Daily Maximum		<= 150 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Manganese, total (as Mn)	Daily Maximum		<= 0.1 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Mercury, total (as Hg)	Daily Maximum		<= 0.002 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Nitrite plus nitrate total 1 det. (as N)	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Nitrogen, total	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
pH, maximum	Daily Maximum		<= 8.5 Standard Units (SU)	Effluent Gross	001	Once Per Permit Term	DISCRT
pH, minimum	Daily Minimum		>= 6.5 Standard Units (SU)	Effluent Gross	001	Once Per Permit Term	DISCRT
Potassium, total (as K)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT

Ponds / Rapid Infiltration Basins for Sample Location 001 (Effluent Discharge-External Outfall) To Be Reported Once During The Permit Term[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Selenium, total (as Se)	Daily Maximum		<= 0.05 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Silver, total (as Ag)	Daily Maximum		<= 0.1 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Sodium, total (as Na)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Sulfate, total (as SO4)	Daily Maximum		<= 500 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Thallium, total (as Tl)	Daily Maximum		<= 0.002 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Solids, total dissolved	Daily Maximum		<= 1000 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Uranium, natural, total	Daily Maximum		<= 0.01 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Cyanide, weak acid, dissociable	Daily Maximum		<= 0.2 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Zinc, total (as Zn)	Daily Maximum		<= 5 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT

Notes (Ponds / Rapid Infiltration Basins):

1. Analysis is for the dissolved fraction.

Ponds / Rapid Infiltration Basins for Sample Location Rb1 (Rib 1) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Freeboard	Daily Minimum	>= 2.0 Feet (ft)		Effluent Gross	RB1	Quarterly	VISUAL

Ponds / Rapid Infiltration Basins for Sample Location Rb2 (Rib 2) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Freeboard	Daily Minimum	>= 2.0 Feet (ft)		Effluent Gross	RB2	Quarterly	VISUAL

Ponds / Rapid Infiltration Basins for Sample Location Rb3 (Rib 3) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Freeboard	Daily Minimum	>= 2.0 Feet (ft)		Effluent Gross	RB3	Quarterly	VISUAL

Ponds / Rapid Infiltration Basins for Sample Location Rb4 (Rib 4) To Be Reported Quarterly

	Discharge Limitations			Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Freeboard	Daily Minimum	>= 2.0 Feet (ft)		Effluent Gross	RB4	Quarterly	VISUAL

Summary of Changes From Previous Permit
Profile 1 Pollutants of Concern were added to the Wastewater Treatment Plant Table for Outfall 001 for a Once during the Permit cycle reporting requirement.

Additional parameters were added to the **Monitoring Well** tables to adhere to current Division reporting standards being:

"pH" parameter, with a "Value" base, a "Monitor & Report (M&R) Standard Unit" concentration, a "Groundwater" monitoring location, a "Quarterly" Measurement Frequency, and a "Discrt" Sample Type.

"Water level relative to mean sea level" parameter, with a "daily maximum" base, a "M&R Feet" quantity, a "Groundwater" monitoriong location, a "Quarterly" Measurement Frequency, and a "Discrt" Sample Type.

The base discharge limitations were updated for the parameters, Chloride, Nitrogen, TDS from "Value" to "Daily Maximum".

The base discharge limitation was updated for the parameter, Depth to Water Level, from "Value" to "Daily Minimum".

Two footnotes were added to each Groundwater Monitoring Well Table for Outfalls MW1-MW5 being:

1. Depth to groundwater (for the "Depth to Water Level" parameter).

2. Groundwater elevation above mean sea level (AMSL) (for the "Water level relative to mean sea level" parameter).

For the RIBs under the Ponds/Rapid Infiltration Table:

The base discharge limitations were updated for the parameters, Chloride, Nitrogen, and TSS, from "Value" to "Daily Maximum".

"Freeboard" parameter, with a "Daily Minimum" base, "2 Feet" limitation, with an "Effluent Gross" monitoring location, "Quarterly" frequency, and a "Visual" sample type was added to Outfall 001.

The "Barium" parameter, a "Daily Maximum" base, with a "M&R Milligrams per Liter" concentration, at the OWS location based on parameters.

The depth of effluent in each rapid infiltration basin (RIB) shall be measured "Weekly" and recorded in the logbook statement was changed to a "Monthly" measurement period.

Outfalls RB1, RB2, RB3, and RB4 were added for the measurement of the freeboard parameter with a "Daily Minimum" base, a "Less than or Equal to 2 feet" quantity, a "Effluent Gross" monitoring location, with a "Quarterly" measurement frequency, and a "Visual" sample type.

Technology Based Effluent Limitations

Technology based effluent limitations (TBELs) are required as promulgated by the U.S. Environmental Protection Agency (EPA) for Publicly Owned Treatment Works (POTWs). The following limits are based on

secondary treatment standards as allowed by the Code of Federal Regulation (CFR) Title 40, Section 133, and which has been adopted by the state of Nevada:

BOD5 – The daily maximum threshold is limited to 45 mg/L and the quarterly average threshold is limited to 30 mg/L.

The following adjustments to secondary standards have been included in the permit: TSS – The daily maximum threshold is limited to 135 mg/L and the monthly average threshold is limited to 90 mg/L.

The following performance standards for POTWs with equivalent to secondary treatment standards have been included in the permit:

Limits Based on Secondary Treatment Standards:

BOD5: Percent removal >= 85 percent.

TSS: Percent removal >= 85 percent.

pH: Daily Maximum <= 8.5 SU with a Daily Minimum above 6.5 SU. These standards are higher than the federal secondary treatment standards based on levels found under the Profile 1 limits as described on the permit.

Limit Based on Facility's Design Criteria Review:
The Ashbrook Simon-Hartley activated sludge package wastewater treatment plant was designed with an average day flow rate of 0.025 Mgal/d and a peak flow (daily maximum) flow rate of 0.10 Mgal/d.

The permit will be issued for Daily Maximum of 0.0325 MGD, and a 30-Day Average Flow of 0.025 Mgal/d.

Water Quality Based Effluent Limitations
Water quality based effluent limitations are not applicable to this permit.

Proposed Water Quality Based Effluent Limits (monthly/weekly/daily)
Water quality based effluent limitations are not applicable to this permit.

Rationale for Permit Requirements

Basis for Effluent Limitations
There are currently no specific water quality standards that have been formally adopted by the State for groundwater. However, the Division has the discretion to implement effluent limitations outside water quality standards per Nevada Administrative Code (NAC) 445A.243, which states, “In establishing an effluent limitation to carry out the policy of this State set forth in Nevada Revised Statutes (NRS) 445A.305, consideration must be given to, but is not limited by, the following: …(2) the need for standards that specify by chemical, physical, biological or other characteristics the extent to which pollution by various substances will not be tolerated.”

The constituents listed in Profile I have been vetted by the Division and have been included in groundwater discharge permits for many years as a means of regulating groundwater quality. Per NRS 445A.490, “No permit may be issued which authorizes any discharge or injection of fluids through a well into any waters of the State: (3) which would result in the degradation of existing or potential underground sources of drinking water.” The requirement to monitor the effluent for Profile 1 pollutants once per permit term is included to evaluate the quality of the effluent and determine whether the effluent has potential to impact the receiving water. Although cyanide and uranium are not expected to be present in the effluent, the proposed permit requires the Permittee sample these constituents once during the permit term as they are included in the Profile 1 list and they have not been sampled before.

Monitoring is required to ensure that the treatment plant capacity is not exceeded, to assess the level of

treatment being provided, and to monitor groundwater quality.

Treatment Plant - BOD, TSS, total nitrogen and pH are typically required to be monitored by all wastewater treatment facilities. Limits are based on Secondary Treatment standards and used to assess the performance of the publicly owned treatment works.

Monitoring Wells - Depth to water level, chloride, total nitrogen, and TDS are typically monitored at all facilities required to monitor groundwater. Limits are based on standard Division monitoring requirements.

Oil/Water Separator
- Arsenic, cadmium, chromium, lead, benzene, chlorobenzene, ethylbenzene, methylene chloride (dichloromethane), TCE, toluene, PCE, and xylene are listed as believed present in a previous permit application.
MTBE and TPH are expected to be present at a vehicle fueling facility. TPH limit is based on general equipment treatment capabilities.

Some wastewater treatment processes can increase or decrease wastewater pH; therefore, monthly monitoring for pH is included to assess compliance with federal standards. As the Profile 1 pH limits are more stringent than the secondary treatment limits of 9.0 SU and 6.0 SU, the Profile I limits for pH have been implemented being 8.5 SU to 6.5 SU.

Other Required Water Quality Monitoring:

The requirement to monitor the effluent for Profile 1 pollutants once per permit term is included to evaluate the quality of the effluent and determine whether the effluent has potential to impact the receiving water. Although cyanide and uranium are not expected to be present in the effluent, the proposed permit requires the Permittee sample these constituents once during the permit term as they are included in the Profile 1 list and they have not been sampled for before.

For the OWS, the total petroleum hydrocarbon requirement of 15 mg/L or less discharge concentration is based on design criteria as set forth by the Amerian Petroleum Institute and Army Corps of Engineers for standard test conditions.

For the OWS, toluene is required to be monitored and reported to assess the quality of wastewater being discharged, from the separator, for the protection of human health and the environment. Toleune is regulated as a primary drinking water standard both the maximum contaminant level (MCL) and the maximum contaminant level goal (MCLG) is 1 mg/L, this same concentration is assigned to toleune under the permit.

For the OWS, xylene is required to monitored and reported to assess the quality of waterwater being discharged, from the separator, for the protection of human health and the environment. Xylene is regulated a a primary drinking water standard and the MCL and MCLG are both 10 mg/L, with a lower concentration assigned under the permit, being "1".

Anti-backsliding
None of the proposed permit limits were changed to a less restrictive limit compared to those in the previous permit.

Antidegradation
The Division has developed an antidegradation regulation that is applied on a statewide basis, and which meets the statutory requirements of Nevada's water pollution control law found at Nevada Revised Statute (NRS) 445A.520 and NRS 445A.565 and is consistent with the federal antidegradation policy found at Title 40 in the Code of Federal Regulations (CFR) § 131.12. The objective of the Division's antidegradation regulation is to prevent degradation of Nevada's surface waters and maintain the unique attributes and special characteristics and water quality associated with high-quality waters.

As this permit is for discharges to groundwater, and not surface water, the new antidegradation rule is not applicable. There are currently no specific water quality standards that have been formally adopted by the State for groundwater, however, data reviewed during the renewal process does not indicate the potential for degradation of the groundwater from the treated effluent discharged within the compliance limits of the proposed permit.

Special Conditions
See the Special Approvals/Conditions Table below.

SA – Special Approvals / Conditions Table

Item #	Description
1	The oil/water separator shall be adequately posted and locked to avoid public access.
2	The oil/water separator shall be pumped at least once each year. Contents removed shall be disposed of in a manner approved by the Division.
3	The depth of effluent in each rapid infiltration basin (RIB) shall be measured monthly and recorded in the logbook.
4	A minimum of 2 feet of freeboard shall be maintained in each of the rapid infiltration basins required by permit part B.PB.4.3.

Discharges From Future Outfalls/ Planned Facility Changes
There are no proposed discharges from future outfalls or planned facility changes.

Corrective Action Sites
There are two Bureau of Corrective Action (BCA) remediation sites that are located onsite at the TA's property. The first case is 090514-02, which had a confirmed release of gasoline from an underground storage tank in May 2006. The second remediation case is 100308-03, which had a confirmed release of diesel from an underground storage tank in March 2010. It is not anticipated that the discharge of the treated effluent water at the same site will negatively affect the active BCA sites.

Wellhead Protection Program
The outfalls are located in the Drinking Water Protection Area of the Public Water Supply (PWS) wells, which is defined by a 3,000-foot radius around a PWS well. The PWS well is 460 southwest to 980 northeast feet away from outfall 002 and 001, respectively. The well is 635 feet deep, has a sanitary seal that is 200 feet deep and a screen from 295 to 635 feet. The second well is located 561 east to 1270 south feet away from outfall 001 and 002, respectively. The well is 670 feet deep, has a sanitary seal that is 280 feet deep and a screen from 337 to 437 feet and 477 to 577 feet. The recent chemical history of the well reports that the well shas been having exceedances of iron, arsenic, fluoride in 2016 through 2023 and detections of toluene in 2016. The wells are at minimal risk based on the confined aquifer and the well depths.

Schedule of Compliance:

SOC – Schedule of Compliance Table

Item #	Description	Due Date
1	The Permittee shall submit two copies (one hard copy and one electronic copy) of an updated Operations and Maintenance (O&M) Manual for review and approval by the Division. The O & M Manual shall follow guidance document, WTS2 Minimum Information Required for an Operation and Maintenance Manual for a Wastewater Treatment Plant and should be prepared and wet stamped by a licensed, qualified Nevada engineer (P.E.).	1/25/2028

Deliverable Schedule:

DLV– Deliverable Schedule for Reports, Plans, and Other Submittals

Item #	Description	Interval	First Scheduled Due Date
1	Discharge Monitoring Reports	Quarterly	10/28/2025
2	Annual Reports	Annually	1/28/2026

Procedures for Public Comment:

The Notice of the Division's intent to issue a permit authorizing the facility to discharge to groundwater of the State of Nevada subject to the conditions contained within the permit, is being mailed to interested persons on our mailing list and will be posted on our website at https://ndep.nv.gov/posts. Anyone wishing to comment on the proposed permit can do so in writing until 5:00 P.M. **5/7/2025,** 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 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 issue/re-issue the proposed 5-year permit.

Prepared by: **Melissa Hanson**
Date: **3/27/2025**
Title: **Staff II Engineer**