# FACTSHEET
## (pursuant to NAC 445A.236)

**Permittee Name:** GEORGIA-PACIFIC GYPSUM LLC

11401 US HIGHWAY 91
NORTH LAS VEGAS, NV 89165

**Permit Number:** NS2004516

**Permit Type:** GROUNDWATER DISCHARGE

**Designation:** GROUNDWATER

**New/Existing:** EXISTING

**Location:** GEORGIA PACIFIC GYPSUM LLC, CLARK
11401 NORTH U.S. HIGHWAY 91, LAS VEGAS, NV 89165
LATITUDE: 36.345586, LONGITUDE: -114.920646
TOWNSHIP: T19S, RANGE: R63E, SECTION: S34

| Outfall / Well Num | Outfall / Well Name | Location Type | Well Log Num | Latitude | Longitude | Receiving Water |
|---|---|---|---|---|---|---|
| 001 | EVAPORATION POND | External Outfall | | 36.344542 | -114.922564 | GROUNDWATER |
| 002 | CONCRETE SUMP | External Outfall | | 36.344714 | -114.921891 | GROUNDWATER |
| 003 | MONITORING/LEAK DETECTION WELL | Monitoring Well | | 36.344323 | -114.922299 | GROUNDWATER |
| 004 | RECYCLE POND- DUST CONTROL | External Outfall | | 36.344876 | -114.921474 | GROUNDWATER |

### Permit History/Description of Proposed Action
This discharge permit was initially issued in 2004 and subsequently renewed in 2009 and 2017, with a major modification approved in 2020. The permit has been administratively continued since 2023 and is now being renewed.

This permit renewal reflects the facility's continued authorization to manage and discharge these combined waste streams in accordance with regulatory requirements.

### Facility Overview
The Georgia Pacific Gypsum Corporation operates a facility primarily focused on manufacturing wallboard and alpha plaster products. This facility manages process wastewater generated from several manufacturing processes. Key components include a 1.3-acre evaporation pond, lined with 60-mil HDPE, designed to handle all wastewater flows. Wastewater from the plaster plant building is either used for dust control or directed to the lined evaporation pond.

Water is sourced from an onsite groundwater well, drawing from an aquifer approximately 600 feet below ground surface, and treated using sand media and reverse osmosis (R.O.) for use in the boiler. Additionally, significant amounts of water are required for dust abatement across unpaved areas and gypsum storage piles, utilizing both groundwater and process wastewater.

The Recycle Pond (Outfall 004) handles two separate waste streams from the Wallboard Plant: wash water from equipment cleaning and reverse osmosis reject water from potable water treatment. Collected

wastewater from these streams is stored in a 20-by-50-foot concrete-lined pond with a 45,000-gallon capacity before being recycled back into the manufacturing process.

This facility also utilizes a 2-inch pipeline to convey process wastewater from a concrete sump near the Plaster Plant to the evaporation pond, equipped with a flow meter for accurate tracking. The entire site is secured with a 6-foot chain-link fence topped with barbed wire, with tortoise protection fencing installed along the base.

Since the 2020 major modification, Georgia Pacific Gypsum has discharged additional wastewater from the Eclipse process—used to cool extruded polypropylene—into the existing evaporation pond. Previously, this Eclipse wastewater was collected in totes and transported offsite monthly for disposal.

The drinking water aquifer serving this facility and surrounding users lies at a depth ranging from approximately 600 to 1,205 feet below ground surface. Groundwater from this aquifer does not meet primary drinking water standards without treatment and therefore requires reverse osmosis (RO) prior to use as potable water. Due to the depth of the aquifer, the naturally poor water quality, and the designation of water as a limited resource in southern Nevada, the NDEP authorizes the reuse of this water for dust control purposes as a means of promoting water conservation.

This facility is also covered under permit GNEVOSDS09 for an Onsite Sewage Disposal System.

**Outfall Summary**
The Georgia Pacific Gypsum Corporation facility operates 4 main outfalls to manage wastewater generated from manufacturing processes:

**Outfall 001 (Evaporation Pond):** Outfall 001 directs process wastewater from the Plaster Plant to a 1.3-acre HDPE-lined evaporation pond, designed to accommodate all flows from the plant. This pond supports facility water management by allowing excess wastewater to evaporate and serves as a supplemental source for dust control. The pond's top berm is accessible for inspection and maintenance, ensuring operational integrity. Process wastewater is conveyed from a concrete sump via a 2-inch pipeline equipped with a flow meter, providing a monitored delivery system.

**Outfall 002 (Concrete Sump):** The Concrete Sump, located adjacent to the Plaster Plant, temporarily collects wastewater from several manufacturing processes used to produce alpha plaster products (see "Effluent Characterizations" section for a detailed list).

**Outfall 003 (Monitoring Well):** The monitoring well (Outfall 003) serves as a leak detection system for the lined evaporation pond. To evaluate potential leakage impacts on groundwater, sampling for antimony has been added as a requirement. The monitoring well has been installed approximately 20 feet east and hydraulically downgradient of the HDPE-lined evaporation pond to enhance leak detection.

**Outfall 004 (Recycle Pond- Dust control):** Outfall 004 is a concrete-lined pond measuring approximately 20 feet by 50 feet, with a total capacity of 45,000 gallons. It is designated to manage two separate waste streams generated by operations at the Wallboard Plant. The first waste stream consists of equipment wash water, which is collected via floor trenches and directed to the pond. The second stream comprises reject water from the R.O. potable water treatment system. Both streams are subsequently recycled and reintroduced into the wallboard manufacturing process. Beginning in 2020, wastewater from the Recycle Pond has also been utilized for dust abatement purposes.

**Effluent Characterization**
Discharge to the evaporation pond (outfall 001) consists of seven (7) waste streams from the Plaster Plant, as follows:

A. Compressor condensate from facility air compressors and air tanks;
B. Sand filter media backflush from the filter media;

C. Reverse osmosis concentrate from the concentrated side of the 30-gpm R.O. unit;
D. Autoclave process condensate from the autoclave calcining process, which includes:
- Steam condensate from direct boiler steam injection into autoclaves, and
- Condensed water from the calcining process;

E. Boiler blowdown from periodic blowdown of boiler water;
F. Water softener regeneration backflush;
G. Eclipse wastewater.

Discharge to the Recycle Pond (Outfall 004) comprises two distinct waste streams originating from the Wallboard Plant:

A. Equipment wash water; and
B. Reject water generated by the R.O. potable water treatment system.

**Pollutants of Concern**
Pollutants of concern are substances or parameters believed to be present in the discharge that may adversely affect the physical, chemical, or biological integrity of the receiving water. The primary pollutants of concern for the facility's wastewater discharges from Outfalls 001 and 004 are identified below.

Outfall 001:

**pH:**
The pH of Eclipse wastewater was measured at 6.48 standard units (S.U.) during the previous permit cycle, slightly below the Profile I minimum limit of 6.5 S.U., warranting continued monitoring to ensure compliance.

**Total Dissolved Solids (TDS):**
TDS concentrations, were measured at 1,760 mg/L during the previous permit cycle, exceeding the Profile I limit of 1,000 mg/L. Ongoing monitoring is required.

**Arsenic, Total (as As):**
Arsenic levels in Outfall 001 ranged from 15 to 130 µg/L during the previous permit cycle, significantly exceeding the 10 µg/L Profile I threshold. Quarterly monitoring for arsenic is now required.

**Chloride (as Cl):**
Chloride concentrations reached up to 1,280 mg/L during the previous permit cycle, far exceeding the 400 mg/L threshold. Ongoing quarterly monitoring is required.

**Nitrogen, Total (as N):**
Total nitrogen concentrations ranged from 15.5 to 39 mg/L, exceeding the Profile I limit of 10 mg/L. Ongoing quarterly monitoring is required.

Outfall 004:

**Total Dissolved Solids (TDS):**
TDS concentrations in the Recycle Pond, impacted by R.O. reject water from the Wallboard Plant, the water evaporation from the pond and additional reasons, ranged from 1,510 mg/L to 3,580 mg/L during the previous permit cycle. As this water is used for dust suppression, TDS monitoring at the associated outfall is required.

**Arsenic, Total (as As):**
Arsenic concentrations ranged upto 14 µg/L, significantly above the 10 µg/L threshold. Quarterly arsenic monitoring at Outfall 004 is required.

These pollutants have been identified as exceeding applicable Profile I reference values and require continued monitoring to ensure regulatory compliance and protection of water quality in the receiving environment.

**Receiving Water**
The receiving water is the groundwater of the State of Nevada, which is located at a depth of 600 feet, as measured in the water supply well on the property.

Dust control activities will primarily affect the first few inches of soil, where potential pollutants may accumulate. The percolation of these pollutants due to storm events could take years to impact the 600-foot-deep groundwater and may need to be assessed in future permit renewals through the installation of monitoring wells on the site.

Under normal operating conditions, the lined evaporation pond has zero discharge to groundwater. However, in the event of a pond liner failure, there is a potential risk of discharge reaching the groundwater.

Based on conditions at Outfall 003, the associated monitoring well remains dry throughout the year, as consistently documented in all Discharge Monitoring Reports (DMRs). The well has an approximate depth of 50 feet.

**Compliance History**
The facility maintained substantial compliance during the reporting period from July 2017 to May 2025. However, certain pollutants were detected at elevated levels. Additional details are provided under Pollutants of Concern.

**Proposed Effluent Limitations**
The discharge will be limited per the limits described in the table below.

**Groundwater Monitoring Wells Table for Sample Location 003 (Monitoring Well/Leak Detection Well) To Be Reported Quarterly[1]**

| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Water level relative to mean sea level[3] | Daily Maximum | M&R Feet (ft) | | Groundwater | 003 | Quarterly | CALCTD |
| Depth to water level ft below landsurface[2] | Daily Minimum | M&R Feet (ft) | | Groundwater | 003 | Quarterly | DISCRT |
| Chloride (as Cl) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Groundwater | 003 | Quarterly | DISCRT |
| Solids, total dissolved | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Groundwater | 003 | Quarterly | DISCRT |
| Nitrogen, total | Daily Maximum | | <= 10 Milligrams per Liter (mg/L) | Groundwater | 003 | Quarterly | DISCRT |
| Antimony, total (as Sb) | Daily Maximum | | <= 0.006 Milligrams per Liter (mg/L) | Groundwater | 003 | Quarterly | DISCRT |

Notes (Groundwater Monitoring Wells Table):

1. NODI Code "W" is for a dry well.
2. Static water level.
3. Groundwater elevation.

**Zero Discharge Limitations Table for Sample Location 001 (Evaporation Pond) To Be Reported Monthly**

| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Flow rate | Daily Maximum | <= 0.040 Million Gallons per Day (Mgal/d) | | Effluent Gross | 001 | Continuous | METER |
| Flow rate | 30 Day Average | <= 0.020 Million Gallons per Day (Mgal/d) | | Effluent Gross | 001 | Continuous | METER |

**Zero Discharge Limitations Table for Sample Location 001 (Evaporation Pond) To Be Reported Quarterly**

| 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) | Effluent Gross | 001 | Quarterly | DISCRT |
| Chloride (as Cl) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Nitrogen, total | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Solids, total dissolved | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| pH, maximum | Daily Maximum | | M&R Standard Units (SU) | Effluent Gross | 001 | Quarterly | DISCRT |
| pH, minimum | Daily Maximum | | M&R Standard Units (SU) | Effluent Gross | 001 | Quarterly | DISCRT |
| Freeboard | Daily Minimum | >= 2 Feet (ft) | | Internal Monitoring Point | 001 | Quarterly | DISCRT |

**Zero Discharge Limitations Table for Sample Location 001 (Evaporation Pond) To Be Reported Annually**

| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Antimony, total (as Sb) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Arsenic, total (as As) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Beryllium, total (as Be) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Cadmium, total (as Cd) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Chromium, total (as Cr) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Copper, total (as Cu) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Hydrocarbons, total petroleum | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Lead, total (as Pb) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Mercury, total (as Hg) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Nickel, total (as Ni) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Oil & grease | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| | | | M&R | | | | |

**Zero Discharge Limitations Table for Sample Location 001 (Evaporation Pond) To Be Reported Annually**

| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Selenium, total (as Se) | Daily Maximum | | Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Silver, total (as Ag) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Thallium, total (as Tl) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |
| Zinc, total (as Zn) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Annual | DISCRT |

**NS OTHER - Discharge Limitations Table for Sample Location 002 (Concrete Sump) To Be Reported Quarterly**

| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Flow rate | 30 Day Average | M&R Million Gallons per Day (Mgal/d) | | Effluent Gross | 002 | Daily When Discharging[1] | CALCTD |
| Chloride (as Cl) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 002 | Quarterly | DISCRT |
| Sodium, total (as Na) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 002 | Quarterly | DISCRT |
| Solids, total dissolved | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 002 | Quarterly | DISCRT |

Notes (NS OTHER - Discharge Limitations Table):

1. Report the flow rate of the water being discharge from the sump when discharging for dust suppression.

**NS OTHER - Discharge Limitations Table for Sample Location 004 (Recycle Pond- Dust Control) To Be Reported Quarterly**

| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Flow rate | 30 Day Average | M&R Million Gallons per Day (Mgal/d) | | Effluent Gross | 004 | Daily When Discharging[1] | CALCTD |
| Arsenic, total (as As) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 004 | Quarterly | DISCRT |
| Chloride (as Cl) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 004 | Quarterly | DISCRT |
| Solids, total dissolved | Daily Maximum | | <= 10000 Milligrams per Liter (mg/L) | Effluent Gross | 004 | Quarterly | DISCRT |

Notes (NS OTHER - Discharge Limitations Table):

1. Report the flow rate of the water being discharged from the pond when discharging for dust suppression.

**NS OTHER - Discharge Limitations Table for Sample Location 004 (Recycle Pond- Dust Control)**
**To Be Reported Annually**

| 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) | Effluent Gross | 004 | Annual | DISCRT |
| Beryllium, total (as Be) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 004 | Annual | DISCRT |
| Cadmium, total (as Cd) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 004 | Annual | DISCRT |
| Chromium, total (as Cr) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 004 | Annual | DISCRT |
| Copper, total (as Cu) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 004 | Annual | DISCRT |
| Lead, total (as Pb) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 004 | Annual | DISCRT |
| Mercury, total (as Hg) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 004 | Annual | DISCRT |
| Nickel, total (as Ni) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 004 | Annual | DISCRT |
| Selenium, total (as Se) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 004 | Annual | DISCRT |
| Silver, total (as Ag) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 004 | Annual | DISCRT |
| Thallium, total (as Tl) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 004 | Annual | DISCRT |
| | | | M&R | | | | |

**NS OTHER - Discharge Limitations Table for Sample Location 004 (Recycle Pond- Dust Control) To Be Reported Annually**

| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Zinc, total (as Zn) | Daily Maximum | | Milligrams per Liter (mg/L) | Effluent Gross | 004 | Annual | DISCRT |

**Summary of Changes From Previous Permit**
The following changes were made during this permit renewal:

The following pollutants will be reported quarterly from Outfall 001:

- Arsenic, total (as As)
Freeboard - Daily Minimum >= 2 ft.

The following pollutants will be reported annually instead of quarterly from Outfall 001:

- Hydrocarbons, Total Petroleum:
Two exceedances were recorded in 2021, followed by one exceedance in 2022. The source of the contamination was identified and remedied. No further exceedances have been reported since.

- Antimony (Total as Sb):
Antimony was not detected during the current permit cycle.

Outfall 001 – Flow Rate Adjustment:
The 30-day average flow rate for Outfall 001 has been increased from 0.015 million gallons per day (MGD) to 0.020 MGD. This modification does not affect the current fee category. The permittee shall continue to maintain a minimum daily freeboard of greater than or equal to 2 feet.

Outfall 004 name was changed from "RECYCLE POND" to "RECYCLE POND- Dust control"

The following pollutants with limits will be reported quarterly from Outfall 004:
- Arsenic, total (as As)

**Technology Based Effluent Limitations**
Technology based effluent limitations are not applicable to this permit.

**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.

**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 NAC 445A.243, which states, “In establishing an effluent limitation to carry out the policy of this State set forth in 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 Nevada Revised Statute (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.” Therefore, the requirement to sample for the constituents listed in Profile I has been retained.

The limitations and monitoring requirements are intended to minimize the possibility of adverse impacts to groundwaters of the State. These constituents are expected to be present in the process wastewater; therefore, the proposed permit requires the Permittee to sample for these contaminants, as they are included in the Profile I list:

**Flow**: Process water flow to the evaporation pond and dust control activities is monitored via flow meters to ensure that the fluid levels in the pond and dust control operations remain appropriate.

**TDS**: The process water and pond contents, as well as dust control activities, are sampled for TDS. This parameter is monitored to assess the quality of the pond and dust control supernatant in the event of a catastrophic liner leak.

**pH**: The process water and pond contents, along with dust control activities, are sampled for pH. This parameter is monitored to gather information on the quality of the pond supernatant in the event of a catastrophic liner failure.

**Metals**: The pond and dust control contents are sampled quarterly or annually for thirteen metals. These parameters are monitored to evaluate the quality of the pond and dust control supernatant in case of a liner leak.

**Monitoring Well:** The monitoring well (Outfall 003) functions as a leak detection system for the lined evaporation pond. To assess potential groundwater impacts from leakage, antimony sampling has been added as a requirement. Positioned approximately 20 feet east and hydraulically downgradient of the pond, this well monitors for any groundwater impact.

Groundwater is located approximately 600 feet below ground surface (bgs), and when properly applied, the wastewater should not reach this depth. Additionally, as documented in a technical memorandum dated April 30, 2020, the 600 feet of material above the aquifer includes roughly 280 feet of dense, impermeable carbonate rocks. This layer is topped by alluvium with a finer-grained matrix, both of which generally resist water transmission.

Moreover, adding Eclipse wastewater to the lined evaporation pond is not expected to impact groundwater quality. The pond is lined with a 60-mil HDPE liner anchored in a trench at the berm's top. Routine inspections are conducted to assess its condition and confirm the absence of damage.

### Anti-backsliding

To prevent backsliding, effluent limitations in reissued permits must be at least as stringent as those in the previous permit. Backsliding has not occurred in this permit; however, the following changes have been made from the previous permit:

Reporting Frequency Change – Outfall 001:
The following pollutants will now be reported annually instead of quarterly:

Hydrocarbons, Total Petroleum:
Two exceedances were recorded in 2021, followed by one exceedance in 2022. The source of the contamination was identified and remedied. No further exceedances have been reported since.

Antimony (Total as Sb):
Antimony was not detected during the current permit cycle.

Flow Rate Adjustment – Outfall 001:
The 30-day average flow rate has been increased from 0.015 million gallons per day (MGD) to 0.020 MGD. This change does not impact the current fee category. The permittee shall continue to maintain a minimum daily freeboard of greater than or equal to 2 feet.

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

Since this permit is for potential discharges to groundwater and not surface water, the new antidegradation rule is not applicable. Currently, there are no specific water quality standards that have been formally adopted by the State for groundwater.

Degradation of the groundwater from the use of the above mentioned wastewater for dust abatement is not expected to occur. Depth to groundwater is approximately 600 feet bgs; if properly applied, the wastewater should not percolate down to that depth. Additionally, per a technical memorandum dated April 30, 2020, the 600 feet of soil and rock above the aquifer consists of approximately 280 feet of dense impermeable carbonate rocks. This is overlain by an alluvium consisting of a finer grained matrix, both layers generally do not readily transmit water.

Furthermore, the addition of the Eclipse wastewater to the lined evaporation pond is not expected to degrade groundwater. The evaporation pond is lined with a 60-mil HDPE liner that is anchored in a trench at the top of the berm forming the pond. The evaporation pond is routinely inspected to document its condition and verify there is no damage. A monitoring well has also been installed, approximately 20 feet east, and hydraulically down gradient, of the pond, to act as a leak detection system.

**Special Conditions**
There are no special conditions or approvals associated with this permit.

SA – Special Approvals / Conditions Table

| There are no Special Approval / Condition items |
|---|

**Discharges From Future Outfalls/ Planned Facility Changes**
The Permittee does not anticipate discharges from future outfalls or any changes to the facility.

**Corrective Action Sites**
There are three known Bureau of Corrective Actions (BCA) sites located within a 1-mile radius of this site. All three involve diesel spills from 2003 to 2015, and all sites are now closed. The discharge from this facility is not expected to impact the BCA sites.

**Wellhead Protection Program**
There is a Public Water Supply (PWS) well located approximately 270 and 330 feet to the south and southwest of the outfalls that has a depth of approximately 1205 ft with a sanitary seal at 50 feet and a screen from 754 to 1205 feet. The outfall is located in the Drinking Water Protection Area of the wells, which is defined by a 3,000-foot radius around a PWS well. The outfalls are not located in a Wellhead Protection Area (WHPA), which represents an approximate 10-year capture zone of a well. The well is at minimal risk based on the confined aquifer and the well structure and depth.

**Schedule of Compliance:**

SOC – Schedule of Compliance Table

| There are no Schedule of Compliance items |
|---|

**Deliverable Schedule:**

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

| Item # | Description | Interval | First Scheduled Due Date |
|---|---|---|---|
| 1 | Quarterly DMRs | Quarterly | 10/28/2025 |
| 2 | Annual DMRs | Annually | 1/28/2026 |
| 3 | Annual Report | 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. **6/23/2025,** 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: **Lior Singer P.E. M.Sc.**
Date: **5/22/2025**
Title: **Environmental Engineer**