FACTSHEET
(pursuant to NAC 445A.236)

Permittee Name: BURNING MAN PROJECT

660 ALABAMA STREET
SAN FRANCISCO, CA 94110

Permit Number: NS2023512

Permit Type: GROUNDWATER DISCHARGE

Designation: GROUNDWATER

New/Existing: NEW

Location: THE 360, WASHOE
550 STATE ROUTE 34, GERLACH, NV 89412
LATITUDE: 40.66948830, LONGITUDE: -119.360425
TOWNSHIP: 10, RANGE: 32N, SECTION: 23E

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Latitude	Longitude	Receiving Water
001	INFLUENT	Internal Outfall		40.66948830	-119.360425	N/A
002	EFFLUENT	External Outfall		40.66953710	-119.360197	GROUNDWATER

Permit History/Description of Proposed Action
This is a new permit. The Permittee, Burning Man Project, has applied for a new Groundwater Discharge Permit for The 360 wastewater treatment plant (WWTP), at 550 State Route 34, located in Gerlach, being within Washoe County, Nevada. The Permittee proposes to discharge treated wastewater into evaporation pond.

Facility Overview
The 360 project will be composed of a commercial building and future campsites. The first phase will include the development of a complete water system to serve The 360 project, along with a domestic sewage treatment component (as operated under this permit), to treat the wastewater generated by the commercial building's restroom along with wastewater generated by a future onsite campground with full hookups (water/sewer/electrical services) and reject water from the drinking water treatment system. The wastewater treatment system shall be composed of a DryVac 2-stage waste dewatering and drying system and a single layer, high density polyethylene (HDPE)-lined pond into which the treated wastewater will be discharged. The wastewater treatment plant is designed for a maximum daily flow rate of 0.017 million gallons per day (Mgal/d).

Domestic sewage will travel through a collection system composed of grinder pumps installed in force mains plumbed from the building and future campsite area. In the first stage, the domestic sewage travels into a 2,000 gallon holding tank and then batched into the plant as slurry. Using a filter press composed of large plastic plates, the slurry will be compressed to reduce the volume by approximately 90%. The first stage of compression will produce filtrate which will be discharged into the evaporation pond.

In the second phase, under a vacuum, with steam introduced into the plates, the material will be heated, and compression will be increased, with the final, consolidated, dried and desiccated bio-solid product (sludge

cake) dropping freely from the press into storage containers, and the released biologically held water, having reached a level of distillation, either being discharged to the single-layered, HDPE-lined pond to evaporate, or stored in a tank to be returned to the headworks. The final sludge cake product will be removed offsite for disposal.

Discharge to the evaporation pond shall be multi-stream sourced being either filtrate or distilled water.

Outfall Summary
Outfall 001 - This internal outfall is for the measurement of incoming domestic sewage (influent).

Outfall 002 - This external outfall is for the measurement of treated wastewater (effluent) being discharged into the evaporation pond.

Facility Upgrades since last issued permit
Not Applicable - This is a new permit.

Solids Handling
The biosolids (sludge cake) shall be removed offsite to a permitted landfill. Any future land application uses shall need to have a permit issued by the U.S. EPA.

Effluent Management and Reuse
The Permittee proposes to discharge the treated effluent into a lined evaporation pond. Any future beneficial use shall need to be requested to the Division and allowed only after the Division's approval.

Design Flow (and basis) and Measurement & Current Capacity
Limits Based on Facility's Design Criteria Review, and what the Permittee requested, are as follows:

30-day average flow rate for the influent is limited to <= 0.005 Mgal/d.

Daily maximum flow rate for the influent is limited to <= 0.007 Mgal/d.

Pretreatment Program
The facility does not meet the federal EPA’s guidelines requiring them to have a pretreatment program.

Operations & Maintenance (O&M) Manual status
The 360's WWTP’s Operation and Maintenance (O&M) Manual shall be due within 180 days after plant startup. The Permittee shall submit two copies (one hard copy and one electronic copy) of the Operations and Maintenance (O&M) Manual for review and approval by the Division. 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 wet stamped and prepared by a licensed, qualified Nevada engineer (P.E.).

Effluent Characterization
As this is a new system, there are no substantiated numbers to determine the performance of the wastewater treatment plant. Based on two years of reported concentrations and flow rates, additional requirements may be put into place at that time to allow for adherence to secondary treatment standards.

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. Pollutants of concern, for the groundwater, are Arsenic, Nitrogen, Total Dissolved Solids (TDS), Total Uranium, Total Radium (Gross Alpha, Gross Beta, Radium 226, and Radium 228) along with potential inorganic chemicals and metals (Profile 1 contaminants).

Receiving Water
Receiving water is a lined pond for evaporation. The average depth below land surface is less than 5 feet. Additional fill material has been brought into the site for the construction of the building and treatment plants.

Compliance History
Not Applicable - This is a new permit.

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

WWTP Discharge Limitations Table for Sample Location 001 (Influent-Internal Outfall) To Be Reported Monthly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Flow rate	Daily Maximum	<= 0.007 Million Gallons per Day (Mgal/d)		Raw Sewage Influent	001	Continuous	METER
Flow rate	30 Day Average	<= 0.005 Million Gallons per Day (Mgal/d)		Raw Sewage Influent	001	Continuous	METER
BOD, 5-day	Daily Maximum		M&R Milligrams per Liter (mg/L)	Raw Sewage Influent	001	Monthly	DISCRT
BOD, 5-day	30 Day Average		M&R Milligrams per Liter (mg/L)	Raw Sewage Influent	001	Monthly	DISCRT
Solids, total suspended	Daily Maximum		M&R Milligrams per Liter (mg/L)	Raw Sewage Influent	001	Monthly	DISCRT
Solids, total suspended	30 Day Average		M&R Milligrams per Liter (mg/L)	Raw Sewage Influent	001	Monthly	DISCRT

WWTP Discharge Limitations Table for Sample Location 002 (Effluent-External Outfall) To Be Reported Monthly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Flow rate	Daily Maximum	M&R Million Gallons per Day (Mgal/d)		Effluent Gross	002	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Effluent Gross	002	Continuous	METER
BOD, 5-day	Daily Maximum		<= 45 Milligrams per Liter (mg/L)	Effluent Gross	002	Monthly	DISCRT
BOD, 5-day	30 Day Average		<= 30 Milligrams per Liter (mg/L)	Effluent Gross	002	Monthly	DISCRT
Nitrogen, total	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Effluent Gross	002	Monthly	DISCRT
pH, maximum	Daily Maximum		<= 8.50 Standard Units (SU)	Effluent Gross	002	Monthly	DISCRT
pH, minimum	Daily Minimum		>= 6.50 Standard Units (SU)	Effluent Gross	002	Monthly	DISCRT
Solids, total suspended	Daily Maximum		<= 45 Milligrams per Liter (mg/L)	Effluent Gross	002	Monthly	DISCRT
Solids, total suspended	30 Day Average		<= 30 Milligrams per Liter (mg/L)	Effluent Gross	002	Monthly	DISCRT
Alpha, gross particle activity	Daily Maximum		<= 15 Picocuries per Liter (pCi/L)	Effluent Gross	002	Monthly	DISCRT
Radiation,Gross Beta Particle Activity	Daily Maximum		<= 4 Millirems per Year (mrems/yr)	Effluent Gross	002	Monthly	DISCRT
			<= 5				

WWTP Discharge Limitations Table for Sample Location 002 (Effluent-External Outfall) To Be Reported Monthly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Radium 226 + radium 228, total	Daily Maximum		Picocuries per Liter (pCi/L)	Effluent Gross	002	Monthly	DISCRT
Uranium, natural, total	Daily Maximum		<= 0.01 Milligrams per Liter (mg/L)	Effluent Gross	002	Monthly	DISCRT
BOD, 5-day, percent removal	Monthly Average Minimum		>= 85 Percent (%)	Effluent Gross	002	Monthly	CALCTD
Solids, suspended percent removal	Monthly Average Minimum		>= 85 Percent (%)	Effluent Gross	002	Monthly	CALCTD

WWTP Discharge Limitations Table for Sample Location 002 (Effluent-External Outfall) To Be Reported Annually[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	002	Annual	DISCRT
Alkalinity, total (as CaCO3)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Aluminum, total (as Al)	Daily Maximum		<= 0.2 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Antimony, total (as Sb)	Daily Maximum		<= 0.006 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Arsenic, total (as As)	Daily Maximum		<= 0.01 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Barium, total (as Ba)	Daily Maximum		<= 2 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Beryllium, total (as Be)	Daily Maximum		<= 0.004 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Cadmium, total (as Cd)	Daily Maximum		<= 0.005 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Calcium, total (as Ca)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Chloride (as Cl)	Daily Maximum		<= 400 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Chromium, total (as Cr)	Daily Maximum		<= 0.1 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
			<= 1				

WWTP Discharge Limitations Table for Sample Location 002 (Effluent-External Outfall) To Be Reported Annually[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	002	Annual	DISCRT
Fluoride, total (as F)	Daily Maximum		<= 4 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Iron, total (as Fe)	Daily Maximum		<= 0.6 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Lead, total (as Pb)	Daily Maximum		<= 0.015 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Magnesium, total (as Mg)	Daily Maximum		<= 150 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Manganese, total (as Mn)	Daily Maximum		<= 0.1 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Mercury, total (as Hg)	Daily Maximum		<= 0.002 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Nitrite plus nitrate total 1 det. (as N)	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Nitrogen, total	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
pH, maximum	Daily Maximum		<= 8.5 Standard Units (SU)	Effluent Gross	002	Annual	DISCRT
pH, minimum	Daily Minimum		>= 6.5 Standard Units (SU)	Effluent Gross	002	Annual	DISCRT
Potassium, total (as K)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT

WWTP Discharge Limitations Table for Sample Location 002 (Effluent-External Outfall) To Be Reported Annually[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	002	Annual	DISCRT
Silver, total (as Ag)	Daily Maximum		<= 0.1 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Sodium, total (as Na)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Sulfate, total (as SO4)	Daily Maximum		<= 500 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Thallium, total (as Tl)	Daily Maximum		<= 0.002 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Solids, total dissolved	Daily Maximum		<= 1000 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Uranium, natural, total	Daily Maximum		<= 0.01 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Cyanide, weak acid, dissociable	Daily Maximum		<= 0.2 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Zinc, total (as Zn)	Daily Maximum		<= 5 Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT

Notes (WWTP Discharge Limitations Table):

1. Analysis is for the dissolved fraction.

Ponds / Rapid Infiltration Basins for Sample Location 002 (Effluent-External Outfall) To Be Reported Monthly

	Discharge Limitations			Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Freeboard	Daily Minimum	>= 2 Feet (ft)		Effluent Gross	002	Twice Per Month	VISUAL

Summary of Changes From Previous Permit
Not Applicable - This is a new permit.

Technology Based Effluent Limitations
Technology based effluent limitations (TBELs) are required as promulgated by the U.S. EPA for Publicly Owned Treatment Works (POTWs). The EPA published federal secondary treatment standards under Title 40 Code of the Federal Regulations (CFR) Section 133 based on an evaluation of performance data for POTWs practicing a combination of physical and biological treatment.

Performance is measured by monitoring biodegradable organics and suspended solids in the effluent, and the ability to maintain pH. Federal secondary treatment standards are defined under 40 CFR 133 for BOD5 as a 30-day average of 30 mg/L and a 7-day average of 45 mg/L, and for TSS as a 30-day average of 30 mg/L and a 7-day average of 45 mg/L. In addition to describing the minimum levels of effluent quality attainable by secondary treatment, 40 CFR 133.102 states that the 30-day average percent removal of BOD5 and TSS shall not be less than 85%. The State of Nevada Division of Environmental Protection (the Division) has adopted these standards for groundwater discharges and applied the 7-day average thresholds as daily maximum effluent limits for BOD5 and TSS.

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

TSS – The daily maximum threshold is limited to 45 mg/L and the 30-day average threshold is limited to 30 mg/L.

Percentage removal rates for BOD5 and TSS, along with pH limitations are listed below:

BOD5 percent removal monthly average minimum limit is 85%.

TSS percent removal monthly average minimum limit is 85%

pH daily maximum threshold is limited to 9.0 standard units (S.U.) and the daily minimum limit is 6.0 S.U., but with the reporting requirement under the Profile 1 pollutants limiting pH levels to 8.5 S.U. for the daily maximum threshold and the daily minimum being 6.5 S.U., the Profile 1 standards are more stringent, and will be applied to this permit.

The following limits are based on design criteria as submitted to the State of Nevada.

Limits Based on the Permittee's requested flow rates in lieu of the Facility's Design Criteria Review:

30-day average flow rate for the influent is limited to <= 0.005 Mgal/d.

Daily maximum flow rate for the influent is limited to <= 0.007 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 limits 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 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 annually is included to evaluate the quality of the effluent and determine whether the effluent has potential to impact the receiving water. Although cyanide is not expected to be present in the effluent, the proposed permit requires the Permittee sample this constituent yearly, as it is included in the Profile 1 list.

Influent and Effluent Monitoring Requirements:
Monthly influent and effluent monitoring for BOD5 and TSS are included to assess the treatment performance of a WWTP. A monthly sampling frequency for BOD5 and TSS is sufficient for determining compliance with the applicable effluent limitations. The recent removal requirements for BOD5 and TSS are established in the permit as monthly average minimums of 85%, based on secondary treatment standards. Some wastewater treatment processes can increase or decrease wastewater pH; therefore, monthly monitoring for pH is included in assessing compliance with effluent limits of 6.5 S.U. as a daily minimum and 8.5 S.U. as a daily maximum.

Other Water Quality Monitoring Requirements
Discharge limitations, based upon EPA's Primary Drinking Water Standards, have been included for: Total Uranium, Gross Alpha Radium, Gross Beta Radium, along with Radium 226 and Radium 228.
The discharge limitations for these parameters are based on EPA's guide, “Radionuclides in Drinking Water: A Small Entity Compliance Guide” February 2002. These parameters were added due to the high levels of these constituents naturally occurring in the groundwater. The stated concentration for Uranium is utilizing the more stringent concentration, as defined under the Profile 1 Pollutant List and not the concentration stated under the guide referenced above.

Anti-backsliding
Not Applicable - This is a new 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 NRS 445A.520 and NRS 445A.565 and is consistent with the federal antidegradation policy found at 40 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 of 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 wastewater 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	Any future beneficial use of the treated wastewater shall be determined upon receipt of two years of reported parameter concentrations, after the original issuance date. The Permittee may request, to the Division, to use the treated effluent for irrigation or dust suppression after submitting two years of discharge monitoring reports. The request shall be reviewed by the Division."
2	All DMRS must be electronically submitted to the NetDMR database.

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

Corrective Action Sites
There are no active Bureau of Corrective Actions (BCA) remediation sites within a one-mile radius of the treatment facility.

Wellhead Protection Program
The outfall is not located within a Wellhead Protection Area, which represents an approximate 10-year capture zone of a well, or within a Drinking Water Protection Area, which is defined by a 3,000-foot radius around a PWS well.

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 Operations and Maintenance (O&M) Manual for review and approval by the Division. 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 wet stamped and prepared by a licensed, qualified Nevada engineer (P.E.).	11/1/2025

Deliverable Schedule:

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

Item #	Description	Interval	First Scheduled Due Date
1	Monthly DMRs	Quarterly	10/28/2025
2	Annual Report	Annually	1/28/2027

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. **7/15/2025,** 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: **6/10/2025**
Title: **Staff II Engineer**