



FACTSHEET
(pursuant to NAC 445A.236)

Permittee Name: NEVADAN TOWER HOLDINGS, LLC
133 N. VIRGINIA STREET
RENO, NV 89501

Permit Number: NV0021067

Permit Type: MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURAL FACILITY THAT DISCHARGES NON-PROCESS WASTEWATER

Designation: MINOR NPDES

New/Existing: EXISTING

Location: CLUB CAL NEVA, WASHOE
133 NORTH VIRGINIA STREET, RENO, NV 89501
LATITUDE: 39.52627350, LONGITUDE: -119.813346
TOWNSHIP: 19N, RANGE: 19E, SECTION: 11 SE1/4

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Latitude	Longitude	Receiving Water
01A	001 - CASINO PARKING GARAGE BASEMENT DEWATERING DISCHARGE - TOWER BASEMENT DEWATERING SUMP	External Outfall		39.52627350	-119.813346	TRUCKEE RIVER VIA CITY OF RENO STORM DRAIN SYSTEM

Permit History/Description of Proposed Action

The Permittee, Nevadan Tower Holdings, LLC, has applied for the renewal of National Pollutant Discharge Elimination System (NPDES) permit NV0021067 for the Club Cal Neva's Nevadan Tower, located at 133 North Virginia Street in Reno, within Washoe County, Nevada. The Permittee proposes to continue to discharge intercepted groundwater to the Truckee River via the City of Reno storm drain system.

This permit was initially issued in November of 1977. The last renewal was issued on October 1, 2012, and expired on September 30, 2017; the permit has been administratively continued since.

Facility Overview

The Nevadan Tower, of the Club Cal Neva, was originally opened as the Onslow Hotel and Casino (Onslow) in 1982, later merging with the Riverboat Casino, before being purchased by the Club Cal Neva in 1999. In 2015, it was sold and converted into long-term monthly rentals. An NPDES permit for the groundwater discharge was first issued in 1977, to the Onslow, for a discharge of 0.0072 million gallons per day (Mgal/d). The permit was updated in 1999, to include the Riverboat Hotel and Casino, for dewatering activities at 34 W. Second Street, with the discharge flow rate updated to 0.0495 Mgal/d to encompass both areas.

Groundwater is collected in a sump located in the basement of the hotel tower on Virginia Street between First and Second Streets. The sump dewatering system is located two floors below street level at the Club Cal Neva's Nevadan Tower. The sump dewatering system works by collecting groundwater into a low-lying pit (sump), using an automatic submersible or surface pump to discharge the water away from the Nevadan Tower's foundation. The sump is secured by a chain-link fence and locked gate where signage is posted. The sump is covered by a metal grate and has a concrete berm, with an effective height of approximately eight inches, around it to prevent spilled fluids from entering the sump. The sump is outfitted with dual submersible pumps with level floats and a two-inch, ductile iron discharge line. The design limits the pumping capacity of the system and necessitates the use of a portable unmetered pump during high flows with discharge to the alley. This has occurred only once during the last fifteen years due to an extreme flooding event.

The flow rate in the permanent discharge line is recorded by a totalizing meter. There are three lines that discharge into the top of the sump and one line that discharges into the sump from the sump sidewall. The line that enters through the sidewall is from a parking area collection system. One of the top discharge lines is from the fire water system (potable water).

The untreated, intercepted groundwater is discharged to a City of Reno storm drain inlet, located in Fulton Alley, which outlets into the Truckee River.

Club Cal Neva Nevadan Tower's Operation and Maintenance (O&M) Manual was last reviewed and approved on November 13, 2015. The Technical, Compliance, and Enforcement Branch of the Bureau of Water Pollution Control requires O&M Manuals to be updated every ten (10) years, with an updated O&M Manual due within 90 days after the proposed permit's issuance date.

Outfall Summary

Outfall 01A – This outfall is for the discharge of untreated, intercepted groundwater to a storm drain inlet located on Fulton Alley.

Effluent Characterization

Nevada State Network Discharge Monitoring Report (NetDMR) data, as reported from the years 2020 to 2025, was reviewed as part of this permit renewal process. The long-term average daily maximum flow rate was 0.037 Mgal/d. The daily maximum flow limit is 0.0495 Mgal/d. Based on the numbers reported, there was no exceedance of this limit.

Notes:

ug/L = Micrograms per Liter

mg/L = Milligrams per Liter

Mgal/d = Million gallons per Day

N = Nitrogen

TDS = Total Dissolved Solids

Outfall 01A (Effluent):

Chloroform: 3.25 ug/L (2 instances, *)

Nitrate as N: 2.36 mg/L

Nitrogen, total: 2.97 mg/L

Phosphorus, total: 0.32 mg/L

Total Dissolved Solids: 283.81 mg/L

TPH: 1.38 mg/L (4 instances, *)

*The remaining reported instances were below detection.

If a permitted parameter is not listed above, with the outfall, then the reported concentrations were below detection.

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 proposed permit are Beryllium, Nitrate (as N), Nitrogen, Phosphorus, TDS, along with VOCs and toxic materials (as listed under Nevada Administrative Code [NAC] 445A.1236).

Total Residual Chlorine

The Permittee does not incorporate chlorine in their discharge; therefore, there is no requirement to sample for residual chlorine.

Receiving Water

Truckee River via the City of Reno storm drain system.

Applicable Water Quality Standards/Beneficial Uses

The water quality standards (WQSs) for the nearest downstream control point, "Truckee River at East McCarran" (NAC 445A.1686) apply. WQSs for the Truckee River from Idlewild to the East McCarran Boulevard Bridge includes beneficial uses for watering of livestock, irrigation, aquatic life, recreation involving contact with the water, recreation not involving contact with the water, municipal or domestic supply, industrial supply, and propagation of wildlife. Additional WQSs applicable to this section of the Truckee River include ammonia and toxic materials (NAC 445A.118 and NAC 445A.1236). Furthermore, water quality narrative standards applicable to all surface waters (NAC 445A.121) apply.

303 (d) Listing Status

According to Nevada's 2020 – 2022 Water Quality Integrated Report (WQIR), the following beneficial uses for the Truckee River at East McCarran are not supported:

- The Aquatic Life beneficial use is impaired by Temperature.
- The Municipal or Domestic Supply beneficial use is impaired by Beryllium.

According to the Nevada's 2020 – 2022 WQIR, the following beneficial uses for the Truckee River at Lockwood Bridge are not supported:

- The Aquatic Life beneficial use is impaired by Turbidity.
- The Municipal or Domestic Supply beneficial use is impaired by Beryllium.

TMDL

Per Section 303(d)(1)(C) of the CWA, states are required to develop Total Maximum Daily Loads (TMDLs) for parameters that do not meet water quality standards for a waterbody. TMDLs are implemented during the permitting process by limiting the load of that parameter that may be discharged to the receiving water. The Truckee River TMDLs and Waste Loads Allocations (WLAs) for Total Nitrogen, Total Phosphorus, and Total Dissolved Solids were adopted in February 1994. The TMDLs apply to the downstream segments of the Truckee River at Lockwood.

Waste Load Allocation

The Truckee River at Lockwood (NAC 445A.1686) has established TMDLs for total dissolved solids, total nitrogen, and total phosphorus established in 1994. Total Nitrogen has an assigned allocation of 1,000 lbs/day, Total Phosphorus has an assigned allocation of 214 lb/day, and TDS has an assigned allocation of 900,528 lbs/day, but this facility is not part of the waste load allocation agreement with other dischargers.

Compliance History

The Permittee was in compliance during the period reviewed (January 2020 through December 2025).

Proposed Effluent Limitations

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

Discharge Limitations Table for Sample Location 01A (Casino Parking Garage Basement Dewatering Discharge-External Outfall) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Flow rate	7 Day Average ^[1]	<= 0.0495 Million Gallons per Day (Mgal/d)		Effluent Gross	01A	Daily When Discharging	METER
Beryllium, total recoverable (as Be)	Daily Maximum		<= 4 Micrograms per Liter (ug/L)	Effluent Gross	01A	Quarterly	DISCRT
Hydrocarbons, total petroleum	Daily Maximum		<= 1 Milligrams per Liter (mg/L)	Effluent Gross	01A	Quarterly	DISCRT
Nitrogen, ammonia total (as N)	Daily Maximum		<= 0.885 Milligrams per Liter (mg/L)	Effluent Gross	01A	Quarterly	DISCRT
Nitrogen, nitrate total (as N)	Daily Maximum		<= 2 Milligrams per Liter (mg/L)	Effluent Gross	01A	Quarterly	DISCRT
Nitrogen, total	30 Day Average	M&R Pounds per Day (lb/d) ^[2]		Effluent Gross	01A	Quarterly	DISCRT
Nitrogen, total	Daily Maximum		<= 0.43 Milligrams per Liter (mg/L)	Effluent Gross	01A	Quarterly	DISCRT
pH, maximum	Daily Maximum		<= 8.5 Standard Units (SU)	Effluent Gross	01A	Quarterly	DISCRT
pH, minimum	Daily Minimum		>= 7.0 Standard Units (SU)	Effluent Gross	01A	Quarterly	DISCRT
Phosphorus, total (as P)	30 Day Average	M&R Pounds per Day (lb/d) ^[2]		Effluent Gross	01A	Quarterly	DISCRT
Phosphorus, total (as P)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	01A	Quarterly	DISCRT
		M&R					

Discharge Limitations Table for Sample Location 01A (Casino Parking Garage Basement Dewatering Discharge-External Outfall) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Solids, total dissolved	30 Day Average	Pounds per Day (lb/d) ^[2]		Effluent Gross	01A	Quarterly	DISCRT
Solids, total dissolved	Daily Average		<= 120 Milligrams per Liter (mg/L)	Effluent Gross	01A	Quarterly	DISCRT

Notes (Discharge Limitations Table):

1. Monitor discharge rate daily and record 7-day average rates in Mgal/d; report quarterly.
2. Sample and analyze quarterly. Report concentrations in mg/l and calculate mass load in pounds per day (lb/d); report each separately quarterly. lbs/day = conc (mg/l) x flow (Mgal/d) x 8.34.

Discharge Limitations Table for Sample Location 01A (Casino Parking Garage Basement Dewatering Discharge-External Outfall) To Be Reported Annually

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Alkalinity, carbonate (as CaCO ₃)	Daily Maximum		<= 20 Milligrams per Liter (mg/L)	Effluent Gross	01A	Annual	DISCRT
Chloride (as Cl)	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Effluent Gross	01A	Annual	DISCRT
Nitrogen, nitrite total (as N)	Daily Maximum		<= 0.04 Milligrams per Liter (mg/L)	Effluent Gross	01A	Annual	DISCRT
Phosphate, ortho (as P)	Daily Maximum		<= 0.02 Milligrams per Liter (mg/L)	Effluent Gross	01A	Annual	DISCRT
Phosphorus, total (as P)	Annual Average		<= 0.05 Milligrams per Liter (mg/L)	Effluent Gross	01A	Annual	DISCRT
Sodium adsorption ratio	Daily Maximum		<= 0.6 Ratio (Ratio)	Effluent Gross	01A	Annual	DISCRT
Sulfate (as S)	Daily Maximum		<= 8 Milligrams per Liter (mg/L)	Effluent Gross	01A	Annual	DISCRT
Trihalomethane, tot.	Daily Maximum		<= 100 Micrograms per Liter (ug/L)	Effluent Gross	01A	Annual	DISCRT

Discharge Limitations Table for Sample Location 01A (Casino Parking Garage Basement Dewatering Discharge-External Outfall) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Antimony, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Arsenic, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Barium, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Boron, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Cadmium, dissolved (as Cd)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Chromium, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Chromium, Hexavalent [As CR] (Chromium (VI)) ^[1]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Chromium, Trivalent [As CR] (Chromium (III)) ^[1]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Copper, dissolved (as Cu)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Cyanide, free available	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Fluoride, total (as F) ^[2]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
			M&R				

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Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Iron, total recoverable	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Lead, dissolved (as Pb)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Manganese, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Mercury, dissolved (as Hg)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Molybdenum, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Nickel, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Selenium, dissolved [as Se]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Silver, dissolved (as Ag)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Sulfide, total (as S) ^[2]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Thallium, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Zinc, dissolved (as Zn)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
			M&R				

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Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Acrolein	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Aldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
.alpha.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
.beta.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Benzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Bis(2-chloroisopropyl) ether	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Chlordane (tech mix. and metabolites)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Vinyl Chloride (Chloroethylene (Vinyl))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Chlorpyrifos	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
2,4-D, isobutyl ester in sediments	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
DDT ^[3]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
			M&R				

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Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
4,4-DDT	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Demeton	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Diazinon	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Dibutyl phthalate	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
1,3-Dichlorobenzene (M-Dichlorobenzene)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
1,2-Dichlorobenzene (O-Dichlorobenzene)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
1,4-Dichlorobenzene (P-Dichlorobenzene)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
1,2-Dichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
1,1-Dichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
2,4-Dichlorophenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Dichloroprop ^[4]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
			M&R				

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Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Dieldrin	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Di-2-ethylhexyl phthalate	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Diethyl phthalate	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Dimethyl phthalate	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
2-Methyl-4,6-Dinitrophenol (4,6-Dinitro-2-Methylphenol)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
2,4-Dinitrophenol (Dinitrophenols)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Endosulfan, total	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Endrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Ethylbenzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Fluoranthene (Fluoranthene (Polynuclear Aromatic Hydrocarbon))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Azinphos-Methyl (Guthion)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
			M&R				

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Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Heptachlor	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Heptachlor epoxide	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Hexachlorocyclopentadiene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Isophorone	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Lindane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Malathion	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Methoxychlor	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Mirex	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Monochlorobenzenes	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Nitrobenzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Nonylphenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
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Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Parathion	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Pentachlorophenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Phenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Polychlorinated biphenyls (PCBs)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Silvex	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Carbon Tetrachloride (Tetrachloromethane (Carbon Tetrachloride))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Toluene	Daily Maximum		<= 20 Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Toxaphene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Tributyltin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
1,1,1-Trichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Trichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
			M&R				

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Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
1,1-Dichloroethane	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
1,1,2-Trichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
1,1,2,2-Tetrachloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
1,2-Dichloropropane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
2-Chloroethyl vinyl ether, (mixed)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
cis-1,3-Dichloropropene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
trans-1,2-Dichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
trans-1,3-Dichloropropene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Bromoform	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Chlorobenzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Chloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
			M&R				

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Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Chloroform	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Dibromochloromethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Dichlorobromomethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Methyl bromide (Bromomethane)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Methyl chloride (Chloromethane)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Methylene chloride	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Tetrachloroethylene	Daily Maximum		<= 5 Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT
Trichlorofluoromethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	01A	Once Per Permit Term	DISCRT

Notes (Discharge Limitations Table):

1. Analysis to be done to the dissolved fraction.
2. Total recoverable.
3. DDT & metabolites.
4. Dichloropropenes.

Summary of Changes From Previous Permit

Coordinates for Club Cal Neva's actual location were updated to Latitude 39.52627350, Longitude -119.813346.

Under Outfall 01A (Casino Parking Garage Basement Dewatering Discharge), To Be Reported Quarterly, the following parameters and footnote were either added or changed:

CHANGED – Solids, total dissolved, from an "Daily Maximum" Base to a "Annual Average" Base, along with changing from a "M&R Milligrams per Liter (mg/L)" concentration to a "500 Milligrams per Liter (mg/L)"

concentration, with the remaining discharge limitations being unchanged from the previous permit.

ADDED – Beryllium, total recoverable (as Be), with a “Daily Maximum” Base, a “ ≤ 4 Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Quarterly” Measurement Frequency, and a “Discret” Sample Type.

ADDED - Nitrogen, ammonia (as N), with a "Daily Maximum" Base, a " ≤ 0.885 Milligrams per Liter (mg/L)" Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Quarterly” Measurement Frequency, and a “Discret” Sample Type.

ADDED - Nitrogen, total (as N), with a "Daily Maximum" Base, a " ≤ 0.43 Milligrams per Liter (mg/L)" Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Quarterly” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Nitrogen, nitrate total (as N), with a “Daily Maximum” Base, a “ ≤ 2 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Quarterly” Measurement Frequency, and a “Discret” Sample Type.

ADDED – pH, maximum, with a “Daily Maximum” Base, a “ ≤ 8.5 Standard Units (S.U.)” Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Quarterly” Measurement Frequency, and a “Discret” Sample Type.

ADDED – pH, minimum, with a “Daily Minimum” Base, a “ ≥ 7.0 Standard Units (S.U.)” Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Quarterly” Measurement Frequency, and a “Discret” Sample Type.

Under Outfall 01A (Casino Parking Garage Basement Dewatering Discharge), To Be Reported Annually, the following parameters were either added or changed:

CHANGED – All VOCs and base neutral compound parameters, listed below, with a “Daily Maximum” Base, an “M&R Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, an “01A” Sample Location, an “Annual” Measurement Frequency, and a “Discret” Sample Type. These parameters were changed to a “Once During the Permit Term” reporting requirement being based on non-detect levels reported during the past five years. The Division does not expect most of these constituents to be present in the discharge; therefore, once during the permit term sampling is deemed sufficient for obtaining initial water quality data for toxic materials. If, during the next renewal review process, the water quality data shows a reasonable potential (via a Reasonable Potential Analysis) for any constituent, the Division will retain that constituent with a limit and may increase the sampling frequency for that constituent during the next permit renewal cycle.

CHANGED -The VOCs and base neutral compounds changed were 1,1-Dichloroethane, 1,1-Dichloroethylene, 1,1,1-Trichloroethane, 1,1,2-Trichloroethane, 1,1,2,2-Tetrachloroethane, 1,2-Dichlorobenzene, 1,2-Dichloroethane, 1,2-Dichloropropane, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, 1,4-Dichlorobenzene, 2-Chloroethyl vinyl ether (mixed), cis 1,3-Dichloropropene, trans 1,2-Dichloroethylene, trans 1,3-Dichloropropene, Benzene, Bromoform, Carbon tetrachloride, Chlorobenzene, Chloroethane, Chloroform, Dibromochloromethane, Dichlorobromomethane, Methyl bromide, Methyl chloride (Chloromethane), Methylene chloride, Tetrachloroethylene, Trichlorofluoromethane, Trichloroethylene, and Vinyl Chloride to a once during the permit term sampling frequency.

ADDED – Alkalinity, carbonate (as CaCO₃), with a “Daily Maximum” Base, a “ ≤ 20 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Annual” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Chloride (as Cl), with a “Daily Maximum” Base, a “ ≤ 10 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Annual” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Nitrogen, nitrite total (as N), with a “Daily Maximum” Base, a “0.04 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Annual” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Phosphate, ortho (as P), with a “Daily Maximum” Base, a “ ≤ 0.02 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Annual” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Phosphorus, total (as P), with an “Annual Average” Base, an “ ≤ 0.05 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Annual” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Sodium adsorption ratio, with a “Daily Maximum” Base, a “ ≤ 0.6 Ratio (Ratio)” Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Annual” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Sulfate (as S), with a “Daily Maximum” Base, a “ ≤ 8 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Annual” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Trihalomethane, tot., with a “Daily Maximum” Base, a “ ≤ 100 Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “01A” Sample Location, a “Annual” Measurement Frequency, and a “Discret” Sample Type.

Under Outfall 01A (Casino Parking Garage Basement Dewatering Discharge), To Be Reported Once During the Permit Term, the following parameters were either added or changed:

ADDED – All VOCs and base neutral compound parameters, listed below, with a “Daily Maximum” Base, an “M&R Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, an “01A” Sample Location, an “Once Per Permit Term” Measurement Frequency, and a “Discret” Sample Type.

ADDED -The VOCs and base neutral compounds being 1,1-Dichloroethane, 1,1-Dichloroethylene, 1,1,1-Trichloroethane, 1,1,2-Trichloroethane, 1,1,2,2-Tetrachloroethane, 1,2-Dichlorobenzene, 1,2-Dichloroethane, 1,2-Dichloropropane, 1,3-Dichlorobenzene, 1,4-Dichlorobenzene, 1,4-Dichlorobenzene, 2-Chloroethyl vinyl ether (mixed), cis 1,3-Dichloropropene, trans 1,2-Dichloroethylene, trans 1,3-Dichloropropene, Benzene, Bromoform, Carbon tetrachloride, Chlorobenzene, Chloroethane, Chloroform, Dibromochloromethane, Dichlorobromomethane, Methyl Bromide, Methyl chloride (Chloromethane), Methylene chloride, Tetrachloroethylene, Trichlorofluoromethane, Trichloroethylene, and Vinyl Chloride.

ADDED - The toxic materials listed in NAC 445A.1236, with a “Daily Maximum” Base, an “M&R Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, an “01A” Sample Location, an “Once Per Permit Term” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Footnotes 1, 2, 3, and 4.

1. Analysis to be done to the dissolved fraction.
2. Total recoverable.
3. DDT & metabolites.
4. Dichloropropenes.

Under SOC – Schedule of Compliance Table the following item was added:

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 the division’s guidance document, WTS-2A Minimum Information Required for an Operation and Maintenance Manual for Pump-and-Treat Facilities and Dewatering Operations.

Technology Based Effluent Limitations

Technology based effluent limitations are not applicable to the proposed permit.

Water Quality Based Effluent Limitations

State regulations require that point source discharges not cause a violation of any applicable WQSs in the receiving water, nor interfere with the attainment or maintenance of beneficial uses. The following WQBEL requirements, based on NAC 445A.1686, are included in the proposed permit to ensure that the discharge does not cause WQS violations. In addition, the proposed permit requires monitoring and reporting of constituents that have the potential to be present in the discharge and are subject to WQSs.

Per NAC 445A.1686, temperature, dissolved oxygen (DO), total suspended solids (TSS), turbidity, color, *Escherichia coli* (*E. coli*), fecal coliform, and biological oxygen demand (BOD) are required to be sampled for. The discharge from this facility will travel through the City of Reno's storm drain system before reaching the Truckee River; therefore, sampling the discharge for DO, temperature, and BOD is irrelevant in this instance. TSS and turbidity are also not required to be sampled as groundwater typically has low suspended solids. Color is also not required to be sampled as groundwater is normally clear and colorless. Furthermore, since there are no sources of fecal coliform or *E. coli* in the waste stream, sampling of these constituents is not required.

This permit retains the daily maximum of "M&R Pounds per Day (lb/d)" quantity and establishes an annual average of "120 Milligrams per Liter (mg/L)" concentration for Total Dissolved Solids, based on established Total Maximum Daily Loads (TMDLs) for the Truckee River and in accordance with the water quality standards for the municipal or domestic supply beneficial use (as prescribed under NAC 445A.1686), with a quarterly reporting requirement.

This permit retains the daily maximum of "M&R Pounds per Day (lb/d)" quantity along with establishing a limit of "0.43 Milligrams per Liter (mg/L)" concentration for Total Nitrogen, based on established TMDLs for the Truckee River and in accordance with the water quality standards for the municipal or domestic supply beneficial use (as prescribed under NAC 445A.1686), with a quarterly reporting requirement.

This permit retains the daily maximum of "M&R Pounds per Day (lb/d)" quantity and an annual average of "0.05 Milligrams per Liter (mg/L)" concentration for Total Phosphorus, based on established TMDLs for the Truckee River and in accordance with water quality standards for aquatic life and recreation with contact beneficial uses (as defined under NAC 445A.1686), with a quarterly reporting requirement.

Reasonable Potential Analysis (RPA)

Section 301(b)(1)(c) of the CWA requires effluent limitations necessary to meet WQSs, and Title 40 of the Code of Federal Regulation (CFR) section 122.44(d) requires permits to include conditions that are necessary to achieve WQSs established under section 303 of the CWA, including state narrative criteria for water quality. Federal regulations at 40 CFR 122.44(d)(1)(i) state, "Limitations must control all pollutants or pollutant parameters (either conventional, nonconventional, or toxic pollutants) which the Director determines are or may be discharged at a level that will cause, have the reasonable potential to cause, or contribute to an excursion above any State water quality standard, including State narrative criteria for water quality." The process to determine whether a WQBEL is required as described in 40 CFR 122.44(d)(1)(i) is referred to as a reasonable potential analysis, or RPA. Furthermore, NAC 445A.243 requires the Division to consider the establishment of effluent limitations necessary to meet WQSs

For conducting the RPA, the Division used a mass balanced approach to determine the expected critical downstream receiving water concentration using statistics recommended in the United States Environmental Protection Agency's Technical Support Document (TSD) for Water Quality Based Toxic Control for statistically calculating the projected maximum effluent concentration (i.e., Table 31 of the TSD using the 99 percent probability basis and 99 percent confidence interval). For purposes of the RPA, the critical receiving water flow was assumed to be zero (i.e., no dilution); therefore, the critical effluent pollutant concentrations were compared with the most restrictive water quality criteria under NAC 445A.1236 and

NAC 445A.1686 to determine if the discharge has reasonable potential to cause, or contribute to, an excursion above a State WQS.

The RPA was based on data collected from January 2020 to December 2025 which includes effluent data submitted in DMRs and the Permittee's monitoring laboratory reports.

Based on the RPA, the discharge exhibits reasonable potential to cause, or contribute to, instream excursions above the applicable water quality criteria for Nitrate (as N).

Proposed Water Quality Based Effluent Limits (monthly/weekly/daily)

The proposed permit establishes a daily maximum with a "0.885 Milligrams per Liter (mg/L)" concentration for Total Ammonia (as N), in accordance with the aquatic beneficial use as well as water quality criteria specified in NAC 445A.118, along with a quarterly reporting requirement.

The proposed permit establishes a daily maximum with an "2.0 Milligrams per Liter (mg/L)" concentration for Nitrate (as N), in accordance with the aquatic life beneficial use (prescribed under NAC 445A.1686), along with an quarterly reporting requirement.

The proposed permit establishes a daily minimum of "7.0 standard units (S.U.)" concentration and a daily maximum of "8.5 S.U." concentration, in accordance with the requirement to maintain existing higher quality (RMHQ) (as prescribed under NAC 445A.1686), along with a quarterly reporting requirement.

The proposed permit establishes a daily maximum of "100 Micrograms per Liter (ug/L)" concentration for Total Trihalomethanes (as prescribed under NAC 445A.1236), with a quarterly sampling requirement.

The proposed permit establishes a daily maximum of "20 Milligrams per Liter (mg/L)" concentration for Alkalinity (as CaCO₃), in accordance with the aquatic life beneficial use (prescribed under NAC 445A.1686), along with an annual reporting requirement.

The proposed permit establishes a daily maximum with an "10 Milligrams per Liter (mg/L)" concentration for Chloride, in accordance with the municipal or domestic supply beneficial use (for the RMHQ as defined under NAC445A.1686), along with an annual reporting requirement.

The proposed permit establishes a daily maximum with an "0.04 Milligrams per Liter (mg/L)" concentration for Nitrite (as N), in accordance with the aquatic life beneficial use (defined under NAC 445A.1686), along with an annual reporting requirement.

The proposed permit establishes a daily maximum of "0.02 Milligrams per Liter (mg/L)" concentration for Orthophosphate (as P), in accordance with the aquatic life and recreation with contact beneficial uses (for the RMHQ as prescribed under NAC 445A.1686), along with an annual reporting requirement.

The proposed permit establishes an annual average of "0.05 Milligrams per Liter (mg/L)" concentration for Total Phosphorus in accordance with the RMHQ (defined under NAC 445A.1686), for the aquatic life and recreation with contact beneficial uses, with an annual reporting requirement.

The proposed permit establishes a daily maximum of "0.6 Ratio (Ratio)" concentration for Sodium Absorption Ration (SAR), in accordance with the irrigation beneficial use (for the RMHQ as defined under NAC 445A.1686), along with an annual reporting requirement.

The proposed permit establishes a daily maximum with an "8 Milligrams per Liter (mg/L)" concentration for Sulfate, in accordance with the municipal or domestic supply beneficial use (for the RMHQ as prescribed under NAC 445A.1686), along with an annual reporting requirement.

The proposed permit establishes once a permit term sampling of toxic materials as these constituents are listed in NAC 445A.1236. The Division does not expect most of these constituents to be present in the discharge; therefore, once a permit term sampling is deemed sufficient for obtaining initial water quality data for toxic materials. If, during the next renewal review process, the water quality data shows a reasonable

potential (via a Reasonable Potential Analysis) for any constituent, the Division will retain that constituent with a limit and may increase the sampling frequency for that constituent during the next permit renewal cycle.

Mass-Based Limits (If Applicable)

The proposed permit maintains a daily maximum of M&R pounds per day (lbs/day) for Total Nitrogen, based on the TMDLs established for the Truckee River, with a quarterly reporting requirement.

The proposed permit maintains a daily maximum of M&R lbs/day for Total Phosphorus, based on the TMDLs established for the Truckee River, with an monthly quarterly requirement.

The proposed permit maintains a daily maximum of M&R lbs/day for Total Dissolved Solids, based on the TMDLs established for the Truckee River, with a quarterly reporting requirement.

Basis for Effluent Limitations

The proposed permit retains the requirement to sample Total Petroleum Hydrocarbons (TPH) due to concern of potential migration of groundwater plumes located within a mile of the discharge location. TPH is a known carcinogen, can damage organs in the human body, and/or cause potential headaches or dizziness when exposed.

The proposed permit establishes the requirement to sample for Trihalomethanes (THMs) on an annual basis, with an established limit of 100 micrograms per liter (ug/L). THMs are disinfection byproducts formed when chlorine or bromine reacts with organic matter in water. The four primary THMs - Chloroform, Bromodichloromethane, Dibromochloromethane, and Bromoform are regulated due to potential links to cancer, liver, and kidney damage. Long-term exposure is associated with bladder cancer and reproductive issues, with risks arising from drinking, inhaling, or dermal absorption.

The permit retains the requirement to monitor and report VOCs and base neutral compounds to satisfy anti-backsliding requirements; however, as the VOCs and base neutral compounds were reported as non-detect during the past five years, sampling has been decreased from an annual reporting requirement to a once during permit term reporting requirement.

Anti-backsliding

Sections 402(o) and 303(d)(4) of the CWA and federal regulations of 40 CFR 122.44(i) prohibit backsliding and require effluent limitations in a reissued permit to be as stringent as those in the previous permit.

CWA section 402(o)(2) outlines specific exceptions to the general prohibition against revising an existing water quality standard that was developed on a case-by-case basis, using best professional judgment (BPJ) to reflect subsequently promulgated, less stringent effluent guidelines in a renewed, reissued, or modified permit. CWA section 402(o)(2) provides that relaxed limitations may be allowed where new information (other than revised regulations, guidance, or test methods) are now available that were not available at the time of permit issuance, and that would have justified a less stringent effluent limitation. Due to the VOCs and base neutral compounds being non-detect during the past five years, reporting requirements were made less stringent, changing from an "annual" reporting requirement to a "once during the permit term" reporting requirement.

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 565 and is consistent with the federal antidegradation policy found at Title 40 in the CFR section 131.12. The objective of the Division's antidegradation regulation is to prevent degradation of Nevada's surface water and maintain the unique attributes and special characteristics and water quality associated with high-quality waters. This objective is achieved through the implementation of procedures to ensure that water is protected from regulated activities that have the potential to degrade the water quality.

The regulation uses four (4) tiers of antidegradation protection. Tier 1 protects water quality for beneficial uses of the water on a parameter-by-parameter basis. Tier 2 protects high-quality waters where data show the water quality is better than levels needed to protect beneficial uses (on a parameter-by-parameter basis). Tier 2.5 and Tier 3 protect water quality and the special characteristics of waterbodies designated with the beneficial uses of “extraordinary, ecological, aesthetic or recreational value” (NAC 445A.122). The

Division will conduct an antidegradation review only when a permit application is submitted for a new or expanding point source discharge to a surface water or for a new or altered zone of mixing. Since the proposed renewal of this permit does not include a new, or expanding, point source discharge; or, a new or altered zone of mixing, the antidegradation review is not required.

Special Conditions

There are no Special Approvals / Conditions applicable to the proposed permit.

SA – Special Approvals / Conditions Table

There are no Special Approval / Condition items

Discharges From Future Outfalls/ Planned Facility Changes

There are no planned discharges from future outfalls or facility changes.

Corrective Action Sites

There are five (5) active Bureau of Corrective Actions (BCA) remediation sites within a one-mile radius of the Club KI Neva site. The five sites (4-000981, D-000729, D-000757, D-001462, and D-001466), are for the release of heating oil or TPH via an underground storage tank to the soil.

BCA does not anticipate any impact(s) between the remediation sites and the permitted facility as long as the pollutants of concern are limited under the proposed permit and sampled properly.

Wellhead Protection Program

The outfall is located 2370 feet southwest of a Public Water Supply (PWS) well placing the outfall in the Drinking Water Protection Area, which is defined by a 3,000-foot radius around a PWS well. The outfall is not located in a Wellhead Protection Area (WHPA), which represents an approximate 10-year capture zone of a well. The well is located in an unconfined aquifer at a depth of 753 feet. Based on the depth of the well and the distance, the well is at minimal risk of contamination.

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 the Division's guidance document, WTS-2A Minimum Information Required for an Operation and Maintenance Manual for Pump-and-Treat Facilities and Dewatering Operations.	10/1/2026

Deliverable Schedule:

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

Item #	Description	Interval	First Scheduled Due Date
1	Quarterly DMRs	Quarterly	10/28/2026
2	Annual Reports	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. **6/15/2026**, 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: **5/12/2026**

Title: **Staff II Engineer**

Summary of Reasonable Potential Analysis

Parameter	Units	No. of Effluent Samples	Critical Effluent Concentration	Most Stringent Criterion	Criterion Basis	Does RP Exist?
Chloroform	ug/L	5	15.1	No Criteria		No
Nitrate, Total (as N)	mg/L	21	13.67	2	QC to Protect Beneficial Us	Yes