FACTSHEET
(pursuant to NAC 445A.236)

Permittee Name: GNLV CORPORATION

P.O. BOX 610
LAS VEGAS, NV 89125

Permit Number: NV0022993

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

Designation: MINOR NPDES

New/Existing: EXISTING

Location: GOLDEN NUGGET HOTEL AND CASINO, CLARK
129 EAST FREMONT STREET, LAS VEGAS, NV 89101
LATITUDE: 36.170775, LONGITUDE: -115.144558
TOWNSHIP: 20S, RANGE: 61E, SECTION: 34

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Latitude	Longitude	Receiving Water
001	BASEMENT DEWATERING	External Outfall		36.170775	-115.144558	LAS VEGAS WASH VIA CITY OF LAS VEGAS STORMDRAIN SYSTEM

Permit History/Description of Proposed Action
The Permittee, GNLV Corporation, has applied for the renewal of their National Pollutant Discharge Elimination System Permit NV0022993, for the Golden Nugget Hotel and Casino located at 129 East Fremont Street, in Las Vegas, within Clark County, Nevada. The Permittee proposes to continue to discharge intercepted groundwater to the Las Vegas Wash via the Clark County storm drain system.

This permit was first issued on September 9, 1999. The most recent permit was issued on January 1, 2018, and expired on December 31, 2022; the permit has been administratively continued since.

Facility Overview
The Golden Nugget Hotel and Casino, built in 1946, is a historic and luxurious hotel and casino located as part of the Fremont Street Experience in downtown Las Vegas. It offers a mix of modern amenities with old-Vegas charm, including a large casino, various restaurants, a spa, and entertainment options.

Due to a rise in the local groundwater elevation in the late 1990's, a groundwater dewatering system is installed below the first floor slab to collect shallow groundwater under the foundation. The system consists of two parallel, 4-foot deep gravel-filled trenches under the foundation with 4-inch diameter drain pipes that discharge to a collection sump. The sump has two pumps that are automated to activate by float switches. The collected groundwater is pumped from the recovery sump to a storm drain system drop inlet.

The untreated groundwater is discharged into a storm drain system inlet, and then into the existing Clark County Storm Drain System, which flows into Las Vegas Creek, and then to the Las Vegas Wash.

The Golden Nugget's Operation and Maintenance (O&M) Manual was last reviewed and approved on November 5, 2018. The Technical, Compliance, and Enforcement Branch of the Bureau of Water Pollution Control requires O&M Manuals to be updated every two (2) permit cycles which equates to every ten (10) years, with an updated O&M Manual being due on November 5, 2028.

Outfall Summary
Outfall 001 – This external outfall is for the discharge of untreated intercepted groundwater to a storm drain drop inlet located on S. Casino Center Boulevard.

Effluent Characterization
Nevada State Network Discharge Monitoring Report (NetDMR) data, as reported from the years July 2020 to June 2025, was reviewed as part of this permit renewal process. The long-term average discharge flow rate was 0.005 million gallons per day (Mgal/d) and was permitted for 0.036 Mgal/d. The average daily maximum flow was 0.02 Mgal/d based on a monitor and report (M&R) flow rate. Based on the numbers reported, there were no exceedances of this limit.

Notes:
lbs/day = Pounds per Day
mg/L = Milligrams per Liter
Mgal/d = Million Gallons per Day
S.U.= Standard Units
N = Nitrogen
TIN = Total Inorganic Nitrogen
TDS = Total Dissolved Solids
TPH = Total Petroleum Hydrocarbons

Outfall 001:
Ammonia: 0.06 lbs/day
Boron: 0.12 mg/L
Copper: 0.41 mg/L
pH: 7.93 S.U.
Phosphorus: 0.015 lbs/day
Selenium: 0.003 mg/L
TDS: 926.94 mg/L
TIN: 1.07 mg/L
TPH: 0.36 mg/L

Unless listed above, the Volatile Organic Compounds (VOCs), Total Recoverable Metals, Base Neutral Compounds, and other pollutants reported annually during the same period were below detectable levels.

Pollutants of Concern
Pollutants of concern are any pollutant, or parameters, that are believed to be present in the discharge and could affect or alter the physical, chemical, or biological conditions of the receiving water. Pollutants of concern are Boron, Copper, Selenium, and TDS.

Receiving Water
This storm drain flows into Las Vegas Creek near the intersection of S. Las Vegas Blvd and E. Washington Boulevard. Las Vegas Creek is almost entirely conveyed in subsurface storm drains and flows east along E. Washington Boulevard. Las Vegas Creek flows into the Upper Las Vegas Wash.

Applicable Water Quality Standards/Beneficial Uses
The water quality standards (WQSs) for the nearest downstream control point, Las Vegas Wash at the Historic Lateral (NAC 445A.2156) apply. WQSs for the Las Vegas Wash from the confluence of the Sloan Channel and the Historic Lateral includes beneficial uses for watering of livestock, irrigation, aquatic life,

recreation not involving contact with the water, propagation of wildlife, and maintenance of a freshwater marsh. Additional WQSs applicable to this section of the Las Vegas Wash include toxic materials (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, the following beneficial use for Las Vegas Creek is not supported:

- The Aquatic Life beneficial use is impaired by 96-hour Selenium.

According to the Nevada's 2022 – 2022 Water Quality Integrated Report, the following beneficial uses for the Las Vegas Wash above the Treatment Plants are not supported:

- The Aquatic Life beneficial use is impaired by 96-hour Iron, 1-hour Selenium, 96-hour Selenium, TDS and TSS.
- The Irrigation beneficial use is impaired by Boron.
- The Recreation Not Involving Contact with the Water beneficial use is impaired by *Escherichia coli (E. coli).*
- The Watering of Livestock beneficial use is impaired by TDS.

TMDL
Per section 303(d)(1)(C) of the Clean Water Act (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. According to the Las Vegas Wash TMDL Evaluation dated October 2003, the current total phosphorus and total ammonia (as N) TMDLs on the Las Vegas Wash were established in 1989, and became fully effective in 1994 and 1995, respectively. The TMDL applies to the downstream segment: Las Vegas Wash at Lake Mead (NAC 445A.2158).

Waste Load Allocation
The Las Vegas Wash at Lake Mead (NAC 445A.2158) has established TMDLs for total ammonia (as N) and total phosphorus. Per the Bureau of Water Quality Planning (BWQP) memo dated May 16, 2024, "For NPDES permitting purposes, total phosphorus discharge loads associated with groundwater dewatering activities in the Las Vegas area can be assumed to be part of the base phosphorus load recognized in the 1989 Las Vegas Wash Total Phosphorous TMDL Load Allocation." Thus, Total Phosphorus, both concentration and mass, will be monitored and reported. Using the same rationale, total ammonia (as N), both concentration and mass, will be monitored and reported. A quarterly sampling frequency is deemed appropriate to monitor the load to the Las Vegas Wash.

Compliance History
This permit has been in substantial compliance during the period reviewed, being July 2020 through June 2025.

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

Discharge Limitations Table for Sample Location 001 (Basement Dewatering-External Outfall) To Be Reported Monthly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Flow, total [1]	Daily Maximum	M&R Million Gallons (Mgal)		Effluent Gross	001	Monthly	METER
Flow rate	30 Day Average	<= 0.036 Million Gallons per Day (Mgal/d)		Effluent Gross	001	Continuous	METER[1]

Notes (Discharge Limitations Table):

1. Flow to be obtained from the flow meter located on the force main from the dewatering collection sump.
1. Total Discharge per Month

Discharge Limitations Table for Sample Location 001 (Basement Dewatering-External Outfall) To Be Reported Quarterly[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Boron, total recoverable	Daily Maximum		<= 750 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Copper, dissolved (as Cu)	Daily Maximum		<= 29 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Hydrocarbons, total petroleum	Daily Maximum		<= 1.0 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Iron, total recoverable	Daily Maximum		<= 1000 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Nitrogen, ammonia total (as N)	Daily Maximum	M&R Pounds per Day (lb/d)	M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	CALCTD
Nitrogen, inorganic total	Daily Maximum		<= 20 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Nitrogen, nitrate total (as N)	Daily Maximum		<= 90 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Nitrogen, nitrite total (as N)	Daily Maximum		<= 5 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
pH, minimum	Daily Minimum		>= 6.5 Standard Units (SU)	Effluent Gross	001	Quarterly	DISCRT
pH, maximum	Daily Maximum		<= 9.0 Standard Units (SU)	Effluent Gross	001	Quarterly	DISCRT
Phosphorus, total (as P)	Daily Maximum	M&R Pounds per Day (lb/d)	M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	CALCTD
Selenium, dissolved [as Se]	Daily Maximum		<= 6.3 Micrograms per Liter	Effluent Gross	001	Quarterly	DISCRT

Discharge Limitations Table for Sample Location 001 (Basement Dewatering-External Outfall) To Be Reported Quarterly[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
			(ug/L)				
Solids, total dissolved	Daily Maximum		<= 1900 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT

Notes (Discharge Limitations Table):

1. Samples to be obtained from the sample port located on the force main.

Discharge Limitations Table for Sample Location 001 (Basement Dewatering-External Outfall) To Be Reported Once During The Permit Term[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Arsenic, total (as As)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Beryllium, total recoverable (as Be)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Cadmium, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Chromium, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Chromium, Hexavalent [As CR] (Chromium (VI))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Chromium, Trivalent [As CR] (Chromium (III))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Cyanide, total (as CN)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Fluoride, total (as F)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Lead, dissolved (as Pb)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Manganese, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Mercury, dissolved (as Hg)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 001 (Basement Dewatering-External Outfall) To Be Reported Once During The Permit Term[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Molybdenum, total recoverable	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Nickel, total (as Ni)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Silver, total (as Ag)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Sulfide, total (as S)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Zinc, dissolved (as Zn)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Acrolein	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Aldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
.alpha.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
.beta.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Chlordane (tech mix. and metabolites)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Chlorpyrifos	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 001 (Basement Dewatering-External Outfall) To Be Reported Once During The Permit Term[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
4,4-DDT	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Demeton	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Diazinon	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Dieldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Endrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Azinphos-Methyl (Guthion)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Heptachlor	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Heptachlor epoxide	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Lindane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Malathion	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Methoxychlor	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 001 (Basement Dewatering-External Outfall) To Be Reported Once During The Permit Term[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Mirex	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Nonylphenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Parathion	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Pentachlorophenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Polychlorinated biphenyls (PCBs)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Toxaphene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Tributyltin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
1,1-Dichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
1,1-Dichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
1,1,1-Trichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
1,1,2-Trichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 001 (Basement Dewatering-External Outfall) To Be Reported Once During The Permit Term[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
1,1,2,2-Tetrachloroethane	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
1,2-Dichlorobenzene (O-Dichlorobenzene)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
1,2-Dichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
1,2-Dichloropropane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
1,3-Dichlorobenzene (M-Dichlorobenzene)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
1,4-Dichlorobenzene (P-Dichlorobenzene)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
2-Chloroethyl vinyl ether, (mixed)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Benzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Bromoform	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Carbon Tetrachloride (Tetrachloromethane (Carbon Tetrachloride))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Chlorobenzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 001 (Basement Dewatering-External Outfall) To Be Reported Once During The Permit Term[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Chloroethane	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Chloroform	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
cis-1,3-Dichloropropene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Dibromochloromethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Dichlorobromomethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Ethylbenzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Methyl bromide (Bromomethane)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Methyl chloride (Chloromethane)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Methylene chloride	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Tetrachloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Toluene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 001 (Basement Dewatering-External Outfall) To Be Reported Once During The Permit Term[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
trans-1,2-Dichloroethylene	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
trans-1,3-Dichloropropene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Trichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Trichlorofluoromethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Vinyl Chloride (Chloroethylene (Vinyl))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT

Notes (Discharge Limitations Table):

1. Samples to be obtained from the sample port located on the force main.

Summary of Changes From Previous Permit
Under Outfall 001 with a "To Be Reported Quarterly" Table the following changes or additions were made:

CHANGED - All Parameters listed were changed from a “Quarterly Maximum” Base to a “Daily Maximum” Base except for the pH, Minimum parameter.

CHANGED – pH, minimum’s Base from a “Quarterly Minimum” to a “Daily Minimum”.

CHANGED – Solids, total dissolved, with a “Daily Maximum” Base from an “M&R Milligrams per Liter” Concentration to a “1,900 Milligrams per Liter” Concentration.

ADDED – Additional Concentration Discharge Limitation of “M&R Milligrams per Liter” Concentration Limit to Nitrogen, ammonia (as N), and Phosphorus, total parameters.

CHANGED - Nitrogen, ammonia, with a "Daily Maximum" Base to a "M&R Pounds per Day (lb/d)" from "1 Pound per Day (lb/d)" Discharge Limitation.

CHANGED - Phosphorus, total, with a "Daily Maximum" Base to a "M&R Pounds per Day (lb/d)" from "1 Pound per Day (lb/d)" Discharge Limitation.

ADDED – Boron, total recoverable, with a “Daily Maximum” Base, a “<=750 Micrograms per Liter (ug/L)”, an “Effluent Gross” Monitoring Location, a “001” Sample Loc, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Copper, dissolved (as Cu), with a “Daily Maximum” Base, a “<=29 Micrograms per Liter (ug/L)”, an “Effluent Gross” Monitoring Location, a “001” Sample Loc, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Iron, total recoverable, with a “Daily Maximum” Base, a “<=1,000 Micrograms per Liter (ug/L)”, an “Effluent Gross” Monitoring Location, a “001” Sample Loc, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Nitrate, total (as N), with a “Daily Maximum” Base, a “<=90 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “001” Sample Loc, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Nitrite, total (as N), with a “Daily Maximum” Base, a “<=5 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “001” Sample Loc, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Selenium, dissolved (as Se), with a “Daily Maximum” Base, a “<=6.3 Micrograms per Liter (ug/L)”, an “Effluent Gross” Monitoring Location, a “001” Sample Loc, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

CHANGED – Outfall 001, Basement Dewatering – External Outfall, from a To Be Reported “Annually” to a “Once During the Permit Term” Reporting Requirement.

Outfall 001, Basement Dewatering – External Outfall with a Once During the Permit Term the following changes or additions were made.

ADDED – The Organic Chemicals listed under NAC 445A.1236 Standards for Toxic Materials Applicable to Designated Waters, associated with the Aquatic Life, Irrigation and Watering of Livestock beneficial uses, as applicable to the Water Quality Standards for the Las Vegas Wash Above the Treatment Plants, with a “Once During the Permit Term” reporting requirement, with the understanding that they may be revised during the next permit renewal based on actual levels reported.

All the Organic Chemical parameters have a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, “001” Sample Location, a “Once During the Permit Term” Measurement Frequency, and a “Discrt” Sample Type.

CHANGED – Inorganic Compounds listed were changed from a “To Be Reported Annually” to a “Once During the Permit Term”, with all other discharge and concentration parameters remaining the same as previous permit.

CHANGED – Volatile Organic Compounds listed were changed from a “To Be Reported Annually” to a “Once During the Permit Term”, with all other discharge and concentration parameters remaining the same as previous permit.

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

Water Quality Based Effluent Limitations
The proposed permit requires monitoring and reporting of constituents that are subject of WQSs and may be present in the discharge.

The following water quality based effluent limit (WQBEL) requirements, based on NAC 445A.2156, 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 are subject of WQSs and may be present in the discharge. Per NAC 445A.2156, sampling is required for temperature, dissolved

oxygen (D.O.), total suspended solids (TSS), fecal coliform and *E. coli.*

The discharge from the facility will travel many miles through the Clark County storm drain system before finally reaching the Las Vegas Wash; therefore, sampling the discharge for temperature and D.O. is irrelevant in this instance. TSS is also not required to be sampled as groundwater, typically, has low suspended solids. Since the discharge is not associated with treated wastewater, sampling of fecal coliform and *E. coli* are not required.

The proposed permit retains a daily maximum limit of 9.0 S.U. and a daily minimum limit of 6.5 S.U. for pH as prescribed at NAC 445A.2156 to protect the aquatic life designated beneficial use.

The proposed permit retains the requirement to sample for TDS based on the water quality standards stated under NAC 445A.2156, and establishes a limit of 1,900 mg/L as the RPA proved reasonable potential for TDS to cause or contribute to an instream excursion of the WQS.

The proposed permit retains the daily maximum limit of 20 mg/L for Total Inorganic Nitrogen (TIN) as prescribed at NAC 445A.2156 in accordance with the requirement to maintain higher existing quality (RMHQ) standard.

Per NAC 445A.1236, the standards for toxic material apply. Most of the toxic materials listed only have water quality criteria to protect the municipal or domestic supply beneficial uses which are not applicable to the section of the Las Vegas Wash receiving the discharge. Therefore, only the toxic material for water quality criteria to protect the aquatic life, irrigation, and watering of livestock beneficial uses apply. Furthermore, the 96-hour limit for the beneficial use for aquatic life limit was used for copper and iron. Except for copper and iron, the applicable toxic materials shall be sampled for once a permit term period. 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.

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. 136 and NAC 445A.2156 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 July 2020 to June 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 Copper and TDS.

Proposed Water Quality Based Effluent Limits (monthly/weekly/daily)
The proposed permit establishes once per 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 per permit term sampling is deemed sufficient for obtaining initial water quality data for toxic materials.

The proposed permit establishes a daily maximum limit of 6.3 ug/L for Selenium, due to the 303(d) listing of this parameter being a pollutant of concern for the Las Vegas Wash.

The proposed permit establishes a daily maximum limit of 1,000 ug/L for Iron, as prescribed by NAC 445A.1236 and based on it being included in the 303(d) list.

The proposed permit establishes a daily maximum limit of 750 ug/L for Boron, per NAC 445A.1236, based on it being included in the 303(d) list in the Las Vegas Wash.

The proposed permit establishes a daily maximum limit of 29 ug/L for Copper in accordance with the beneficial use for chronic aquatic life included in the WQSs at NAC 445A.1236 and the RPA proved reasonable potential for Copper to cause or contribute to an instream excursion of the WQS.

Basis for Effluent Limitations
Continued monitoring for TPH is required. The proposed permit retains the requirement to sample for TPH due to concern of potential migration of groundwater plumes located within a mile of the discharge location. A limit of 1.0 mg/L and quarterly reporting was retained.

The permit retains the requirement to monitor and report VOCs to satisfy anti-backsliding requirements, even if the prior results have been non-detect during the past 5 years. However, since VOCs have been non-detect since, at least, 2020, the Permittee is only required to sample for VOCs once per permit term. There are no numerical limits for VOCs as these constituents either have a maximum contaminant level (MCL), or are regulated through NAC 445A.1236 for municipal or domestic supply, both of which do not apply to this section of the Las Vegas Wash; therefore, VOCs will be monitored and reported.

Anti-backsliding
Sections 303(d) and 402(o) 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. This permit has maintained the same reporting standards. With the five years of non-detect values being reported for Inorganic Pollutants, TPH, and VOCs, the reporting requirements were changed to a "Once During the Permit Term" period, and additional parameters added (Toxic Materials), as further expanded under NAC 445A.1236.

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 Nevads surface water and maintain the unique attributes and special characteristics and water quality associated with highquality 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 parameterbyparameter 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 associated with this 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 fourteen (14) active Bureau of Corrective Actions (BCA) remediation sites within a one-mile radius of the Golden Nugget. There are nine active cases (8-000272, 8-000652, 8-000853 (2 sites), 8-001122, 8-001149 (2 sites), 8-001419, 8-001512 (2 sites), and H-000243), for the release of either gasoline or diesel, to the groundwater or soil. There are also three (3) other releases from unknown containers of either diesel or solvents (H-000557, H-001029, and H001337).

BCA staff do not expect that the dewatering activity, associated with this permit, will have adverse effects on their on-going remediation sites.

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 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 for an Operations and Maintenance (O&M) Manual for Pump-and-Treat Facilities and Dewatering Operations and be prepared and stamped by a licensed, qualified Nevada engineer (P.E.) or minimally prepared and reviewed by a qualified professional.	11/5/2028

Deliverable Schedule:

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

Item #	Description	Interval	First Scheduled Due Date
1	Quarterly DMRs	Quarterly	4/28/2026
2	Annual DMRs	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. **1/5/2026,** 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: **12/2/2025**
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?
Copper, Total Recoverable	ug/L	4	5,872.7	35	Chronic Aquatic Life	**Yes**
Nitrogen, Total (as N)	mg/L	16	14,389.44	No Criteria		No
Phosphorus, Total (as P)	mg/L	17	721.01	No Criteria		No
Total Dissolved Solids	mg/L	16	1,967.93	1900	RMHQ	**Yes**