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

**Permittee Name:** VENETO HOLDINGS II LLC

1050 E. FLAMINGO ROAD, SUITE 253
LAS VEGAS, NV 89119

**Permit Number:** NV0023043

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

**Designation:** MINOR NPDES

**New/Existing:** EXISTING

**Location:** MARYLAND VILLAS APARTMENT COMPLEX, CLARK
701 N 13TH STREET, LAS VEGAS, NV 89101
LATITUDE: 36.1750, LONGITUDE: -115.129167
TOWNSHIP: T20S, RANGE: R61E, SECTION: S26

| Outfall / Well Num | Outfall / Well Name | Location Type | Well Log Num | Latitude | Longitude | Receiving Water |
|---|---|---|---|---|---|---|
| 001 | FRENCH DRAIN SYSTEM | External Outfall | | 36.1750 | -115.129167 | LAS VEGAS WASH VIA CLARK COUNTY STORM DRAIN SYSTEM |

### Permit History/Description of Proposed Action
The Permittee, Veneto Holdings II LLC, applied for the renewal of their National Pollutant Discharge Elimination System Permit NV0023043, for the Maryland Villas Apartment Complex (MVAC) located at 701 North 13th 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 December 27, 1999. The most recent permit was issued on February 1, 2015, and expired on January 31, 2020; the permit has been administratively continued since.

### Facility Overview
The MVAC is a housing development in Las Vegas, Clark County, Nevada. The site is approximately 5 acres in size and slopes to the east from the western edge of the property. Due to groundwater being encountered during the initial grading and foundation work, and continuing to be an issue in the basement area of the building, a series of dewatering trenches (French drains containing perforated pipes) were installed to convey water from the site. The trenches drain to an inspection manhole, being 6 feet in diameter and 8 feet deep, located below grade. The groundwater combines in the manhole and enters the storm drain system via a 12-inch pipe. A Marsh-McBirney FLODAR unit collects velocity and head data to calculate a continuous flow measurement during storm events, which elevates the shallow water table, resulting in groundwater movement. Flow rates through the system typically do not exceed 50 gallons per minute (gpm). The average flow is approximately 45 gpm. The connection into the County's drop inlet is located on N. 13th Street. Water is discharged from the catchment area, and is gravity fed to a sub-grade pipeline connected to the Clark County storm drain system. The water enters the storm drain system and eventually discharges to the Las Vegas Wash. The dewatering system was not designed to capture and

convey storm water runoff from the parking lot at the site.

The MVAC's Operation and Maintenance (O&M) Manual was last reviewed and approved on May 15, 2015. 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 within ninety (90) days from the permit issuance date.

**Outfall Summary**
Outfall 001 – This external outfall is for the discharge of untreated intercepted groundwater to a storm drain drop inlet located in N. 13th Street.

**Effluent Characterization**
Nevada State Network Discharge Monitoring Report (NetDMR) data, as reported from the years January 2019 to December 2023, was reviewed as part of this permit renewal process. The long-term average discharge flow rate was 0.05 million gallons per day (Mgal/d). The daily maximum flow limit is 0.40 Mgal/d; with nine instances of metering equipment failure reported. Based on the numbers reported, there were no exceedances of this limit.

Notes:
mg/L = Milligrams per Liter
Mgal/d = Million Gallons per Day
S.U. = Standard Units
TDS = Total Dissolved Solids
VOC = Volatile Organic Compounds
TPH - Total Petroleum Hydrocarbons

Outfall 001 (based on five-year average reported numbers):
Nitrogen, Inorganic total: 4.87 mg/L
pH: 8.09 S.U.
TDS: 1613 mg/L

VOCs, 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 Selenium, TDS, TPH, and VOCs.

**Receiving Water**
The dewatering system discharges into a Clark County storm drain drop inlet, then into the Las Vegas Creek, which eventually flows to the Upper Las Vegas Wash. Water quality standards for the Upper Las Vegas Wash are specified in Nevada Administrative Code (NAC) 445A.2156.

**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 (WQIR), the designated beneficial use for aquatic life was impaired in the Las Vegas Creek, based on 96-hour Selenium levels. For

the Las Vegas Wash, from the confluence of the Sloan Channel and the Las Vegas Wash to the Historic Lateral, the same WQIR shows aquatic life being impaired based on levels of 96-hour Iron, 1-hour Selenium, and 96-hour Selenium.

**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. 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. An annual sampling frequency is deemed appropriate to monitor the load to the Las Vegas Wash.

**Compliance History**

The facility has been in substantial compliance during the reporting period spanning January 2020 to December 2024, apart from episodic non-reporting due to metering equipment failure.

**Proposed Effluent Limitations**

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

## Discharge Limitations Table for Sample Location 001 (External Outfall) To Be Reported Monthly

| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Flow rate | 30 Day Average | <= 0.40 Million Gallons per Day (Mgal/d) | | Effluent Gross | 001 | Continuous | METER |
| Flow rate | Daily Maximum | <= 0.40 Million Gallons per Day (Mgal/d) | | Effluent Gross | 001 | Continuous | METER |

**Discharge Limitations Table for Sample Location 001 (External Outfall) To Be Reported Semi Annually**

| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Nitrogen, ammonia total (as N) | Daily Maximum | M&R Pounds per Day (lb/d) | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Semiannual | DISCRT |
| Nitrogen, inorganic total | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross[1] | 001 | Semiannual | DISCRT |
| Nitrogen, nitrate total (as N) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Semiannual | DISCRT |
| Nitrogen, nitrite total (as N) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Semiannual | DISCRT |
| pH, minimum | Daily Minimum | | >= 6.5 Standard Units (SU) | Effluent Gross[1] | 001 | Semiannual | DISCRT |
| pH, maximum | Daily Maximum | | <= 9.0 Standard Units (SU) | Effluent Gross[1] | 001 | Semiannual | DISCRT |
| Phosphorus, total (as P) | Daily Maximum | M&R Pounds per Day (lb/d) | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Semiannual | DISCRT |
| Solids, total dissolved | Daily Maximum | | <= 1900 Milligrams per Liter (mg/L) | Effluent Gross[1] | 001 | Semiannual | DISCRT |

Notes (Discharge Limitations Table):

1. Water collected in the French Drain system shall be sampled at the outlet of the catchment area, prior to discharging to the storm drain system.

**Discharge Limitations Table for Sample Location 001 (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** |
| Arsenic, total recoverable | 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 |
| Boron, total recoverable | 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 |
| Copper, total recoverable | 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 |
| Iron, total recoverable | Daily Maximum | | <= 1000 Micrograms per Liter (ug/L) | Effluent Gross | 001 | 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** |
| Lead, total recoverable | Daily Maximum | | 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, total recoverable | Daily Maximum | | M&R Micrograms per Liter (ug/L) | Effluent Gross | 001 | Once Per Permit Term | DISCRT |
| Molybdenum, total recoverable | Daily Maximum | | M&R Micrograms per Liter (ug/L) | Effluent Gross | 001 | Once Per Permit Term | DISCRT |
| Nickel, total recoverable | Daily Maximum | | M&R Micrograms per Liter (ug/L) | Effluent Gross | 001 | Once Per Permit Term | DISCRT |
| Selenium, dissolved [as Se] | Daily Maximum | | <= 6.3 Micrograms per Liter (ug/L) | Effluent Gross | 001 | Once Per Permit Term | DISCRT |
| Silver total recoverable | 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, total recoverable | 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 |
| | | | M&R | | | | |

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| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| .alpha.-Endosulfan | Daily Maximum | | 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 |
| 4,4-DDT | Daily Maximum | | M&R 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 |
| | | | M&R | | | | |

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| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Heptachlor epoxide | Daily Maximum | | 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 |
| Mirex | Daily Maximum | | M&R 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 |
| | | | <= 1.0 | | | | |

**Discharge Limitations Table for Sample Location 001 (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** |
| Hydrocarbons, total petroleum[1] | Daily Maximum | | Milligrams per Liter (mg/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 |
| 1,1,2,2-Tetrachloroethane | 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 |
| 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 |
| 1,2-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 | Daily Maximum | | M&R Micrograms per Liter (ug/L) | Effluent Gross | 001 | Once Per Permit Term | DISCRT |
| 1,4-Dichlorobenzene | Daily Maximum | | M&R Micrograms per Liter (ug/L) | Effluent Gross | 001 | 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** |
| 2-Chloroethyl vinyl ether, (mixed) | Daily Maximum | | 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 |
| Dichlorobromomethane | 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 |
| Methyl bromide (Bromomethane) | Daily Maximum | | M&R Micrograms per Liter (ug/L) | Effluent Gross | 001 | Once Per Permit Term | DISCRT |
| 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 |
| Chloroethane | Daily Maximum | | M&R 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 |
| Methyl chloride (Chloromethane) | 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 |
| | | | M&R | | | | |

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| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Dibromochloromethane | Daily Maximum | | 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 |
| 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 |
| trans-1,2-Dichloroethylene | Daily Maximum | | M&R 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 | Daily Maximum | | M&R Micrograms per Liter (ug/L) | Effluent Gross | 001 | Once Per Permit Term | DISCRT |
| Methyl tert-butyl ether | Daily Maximum | | M&R Micrograms per Liter (ug/L) | Effluent Gross | 001 | Once Per Permit Term | DISCRT |

Notes (Discharge Limitations Table):

1. Report full range C6-C40 analyses with EPA methods 8015B and 8260B.

**Summary of Changes From Previous Permit**

Ownership of the Maryland Villas Apartment Complex has been updated from "GSL Properties, Inc." to "Veneto Holdings II LLC".

Under the Discharge Limitations Table for Sample Location 001 (External Outfall) To Be Reported Semi-Annually the following parameters were either revised, added, or removed.

The following three parameters were removed as the Permittee cannot calculate a monthly average from one sample being taken every six months:

pH, with a “Maximum Monthly Average” base, with a “<=9.0 Standard Units (SU)” concentration, a “Effluent Gross” Monitoring Location, a “001” Sample Location, a “Semiannual” Measurement Frequency, and a “Discrt” Sample Type.

Solids, total dissolved, with a “30-Day Average” base, with a “<=1900 Milligrams per Liter (mg/L)” concentration, a “Effluent Gross” Monitoring Location, a “001” Sample Location, a “Semiannual” Measurement Frequency, and a “Discrt” Sample Type.

Nitrogen, total inorganic, with a "30-Day Average" base, with a "<= 20 Milligrams per Liter (mg/L)" concentration, an "Effluent Gross" Monitoring Location, a "001" Sample Location, a "Semiannual" Measurement Frequency, and a "Discrt" Sample Type.

Under the same outfall, the following parameters were added based on findings from the Reasonable Potential Analysis:

Nitrogen, nitrate total (as N), with a “Daily Maximum” base, with a “M&R Milligrams per Liter (mg/L)” concentration, a “Effluent Gross” Monitoring Location, a “001” Sample Location, a “Semiannual” Measurement Frequency, and a “Discrt” Sample Type. The requirement to Monitor and Report (M&R) nitrate is due to there being no reasonable potenial to cause, or contribute to, an exceedance of the WQS.

Nitrogen, nitrite total (as N), with a “Daily Maximum” base, with a “M&R Milligrams per Liter (mg/L)” concentration, a “Effluent Gross” Monitoring Location, a “001” Sample Location, a “Semiannual” Measurement Frequency, and a “Discrt” Sample Type. This was assigned a Monitor and Report (M&R) based on the determination done under the analysis. The requirement to M&R nitrite is due to there being no reasonable potential to cause, or contribute to, an exceedance of the WQS.

Nitrogen, ammonia total (as N), with a "Daily Maximum" base, a "M&R Pounds per Day (lb/d)" and a "M&R Milligrams per Liter (mg/L)" concentration, an "Effluent Gross" Monitoring Location, a "001" Sample Location, an "Annual" Measurement Frequency, and a "Discrt" Sample Type. The requirement to M&R Nitrogen, ammonia total, is to track the load dischraged to the receiving water.

Phosphorus, total, with a "Daily Maximum" base, a "M&R Pounds per Day (lb/d)" and a "M&R Milligrams per Liter (mg/L)" concentration, an "Effluent Gross" Monitoring Location, a "001" Sample Location, an "Annual" Measurement Frequency, and a "Discrt" Sample Type. The requirement to M&R total phosphorus is to track the load discharged to the receiving water.

Under the Sample Location 001 (External Outfall) to be Reported Once during the Permit Term the following parameters were added and the reporting period changed from Annually to Once During a Permit Term due to over a decade of “Non-Detect” levels reported for the Volatile Organic Compounds.

The parameters for the beneficial uses as listed under NAC 445A.1236, as applicable to the Water Quality Standards for the Las Vegas Wash at the Historic Lateral, were implemented for a Once During the Permit Term reporting period, with the understanding that they may be revised during the next permit renewal based on actual levels reported.

**Technology Based Effluent Limitations**
Technology based effluent limitations are not applicable to this 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 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 *Escherichia coli* (E. coli). The discharge from this 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. Also, as there are no sources of E. coli or fecal coliform in the intercepted groundwater, sampling of these constituents are not required.

The proposed permit removes 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 as the Reasonable Potential Analysis (RPA) proved no reasonable potential for TIN to cause or contribute to an instream excursion of the WQS.

The proposed permit establishes the requirement to sample for nitrate (as N) and nitrite (as N) as prescribed at NAC 445A.2156 to protect the aquatic life designated beneficial use.The requirement to monitor and report nitrate and nitrite has been established based on the RPA findings.

The proposed permit retains a daily maximum limit of 9.0 standard units (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 establishes the requirement to sample for TDS based on the water quality standards stated under NAC 445A.2156, which includes a TDS requirement of 95% of the single value samples being less than or equal to 1900 mg/L.

The proposed permit retains the requirement for monitoring and reporting 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 the requirement to sample for toxic materials based on standards applicable to designated waters, with the Las Vegas Wash falling within that category as established under NAC 445A.1236.

The proposed permit establishes the requirement to sample for Iron, with a 96-hour average, based on The EPA's *National Recommended Water Quality Criteria*, published May 2009.

**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 for TDS, nitrate, nitrite, and TIN in NAC 445A.2156 to determine if the discharge has reasonable potential to cause, or contribute to, an excursion above a State WQS. Water quality criteria relating to NAC 445A.1236 were not reviewed in this analysis as none of the applicable toxic materials were required to be sampled for in the previous permit and therefore there was no data to review.

The RPA was based on data collected from January 2019 to December 2023 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 TDS. Therefore, limits were included for this constituent. Therefore, the daily maximum limit for TDS has been retained from the previous permit.

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

The proposed permit has established semi-annual sampling for nitrate (as N) and nitrite (as N) as these constituents are listed in NAC 445A.2156 and the previous permit did not include the requirement to sample these constituents. Although the previous permit did not include the requirement to sample for nitrate (as N) and nitrite (as N), the Permittee did obtain samples of these constituents, and the RPA proved no reasonable potential to cause, or contribute to, instream excursions above the applicable water quality criteria. Additionally, the permit retains semi-annual sampling for total inorganic nitrogen (as TIN), TDS, and pH, as these constituents are also listed in NAC 445A.2156.

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 permit retains the requirement to monitor and report VOCs to satisfy antibacksliding requirements, even if the prior results have been non-detect during the past 10 years. However, since VOCs have been nondetect since, at least, 2015, 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.

**Basis for Effluent Limitations**

The Las Vegas Wash ultimately discharges into Lake Mead, which has established total maximum daily loads (TMDLs) for total ammonia and total phosphorus. However, dewatering discharge activities within the general Las Vegas area, "...are considered to be part of the base phosphorous load recognized in the 1989 Lake Mead Total Phosphorous TMDL Load Allocation..." per the BWQP memo dated May 16, 2024; therefore, total phosphorus will be monitored and reported. Furthermore, given that total ammonia as N has been non-detect and in consideration of the established TMDLs and the minimal discharge flow rate, total ammonia as N will also be monitored and reported.

The proposed permit retains the requirement to sample for methyl tertbutyl ether (MTBE). MTBE was used as an additive for unleaded gasoline but is now banned or limited in several states. Due to the known active Bureau of Corrective Action (BCA) sites that had a release of gasoline within a one-mile radius of the Maryland Villas Apartment Complex, there is a potential for the constituent to show up in the discharge. Continued monitoring is required, even if the levels have been non-detected.

The proposed permit retains the requirement to sample for TPH due to the concern of potential migration of

groundwater plumes located within a mile of the discharge location.

**Anti-backsliding**
Sections 303(d)(4) 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 with some exceptions.

The previous permit included the requirement to sample for VOCs once a year. After review of the DMR data, it was noted that VOCs have been reported as non-detect since, at least, 2015. Due to the consistent non-detect values, and because there are no numerical limits for VOCs as they either have a MCL, or are regulated through NAC 445A.1236, for the municipal or domestic supply, both of which do not apply to this section of the Las Vegas Wash, the requirement to sample VOCs once a year has been changed to once a permit term.

**Antidegradation**
The Division has developed an antidegradation regulation that is applied on a statewide basis, and which meets the statutory requirements of Nevada's water pollution control law found at Nevada Revised Statute (NRS) 445A.520 and NRS 445A.565 and is consistent with the federal antidegradation policy found at Title 40 in the CFR section 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. This objective is achieved through the implementation ofprocedures to ensure that waters are 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. However, data reviewed during the drafting process does not indicate the potential for degradation of the receiving water body from the intercepted groundwater discharged within the compliance limits of the proposed permit.

**Special Conditions**
There are no Special Approvals/Conditions applicable to this permit.

SA – Special Approvals / Conditions Table

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

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

**Corrective Action Sites**
There are six (6) active BCA remediation sites located within a one-mile radius of the permitted facility. All six (6) sites (000921-01, 221017-01, 220516-02, 220201-04, 990219-3327, and H-950616F), are for the release of gasoline via an underground storage tank to the groundwater. BCA does not anticipate any impact(s) between the remediation sites and the permitted facility.

**Wellhead Protection Program**
The outfalls are 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 guidance document, WTS-2A Minimum Information for an Operations and Maintenance (O&M) Manual for Pump-and-Treat Facilities and Dewatering Operations. | 3/1/2026 |

**Deliverable Schedule:**

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

| Item # | Description | Interval | First Scheduled Due Date |
|---|---|---|---|
| 1 | Quarterly DMRs | Quarterly | 1/28/2026 |
| 2 | Annual DMRs | Annually | 1/28/2026 |
| 3 | Once during the permit term DMR Report | Once during the permit term | 1/28/2031 |

**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. **10/13/2025,** 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: **9/9/2025**
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? |
|---|---|---|---|---|---|---|
| **Other Pollutants** | | | | | | |
| Nitrate, Total (as N) | mg/L | 10 | 7.19 | 90 | WQC to Protect Beneficial Uses | No |
| Nitrogen, total inorganic | mg/L | 8 | 18.32 | 20 | RMHQ | No |
| Total Dissolved Solids | mg/L | 10 | 2,059.68 | 1900 | RMHQ | **Yes** |