FACTSHEET
(pursuant to NAC 445A.236)

Permittee Name: CAESARS PALACE HOTEL AND CASINO

ONE CAESARS PALACE DRIVE
LAS VEGAS, NV 89109

Permit Number: NV0023191

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

Designation: MINOR NPDES

New/Existing: EXISTING

Location: CAESARS PALACE HOTEL AND CASINO, CLARK
3570 SOUTH LAS VEGAS BOULEVARD, LAS VEGAS, NV 89109
LATITUDE: 36.116219, LONGITUDE: -115.174572
TOWNSHIP: T21S, RANGE: R61E, SECTION: S17

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Latitude	Longitude	Receiving Water
001	PARKING GARAGE	External Outfall		36.116219	-115.174572	FLAMINGO WASH
002	FORUM SHOPS	External Outfall		36.11871720	-115.175956	FLAMINGO WASH
CC2	INFLUENT GROUNDWATER-PARKING GARAGE	Internal Outfall		36.116219	-115.174572	NOT APPLICABLE
CC3	INFLUENT GROUNDWATER-FORUM SHOPS	Internal Outfall		36.11871720	-115.175956	NOT APPLICABLE
SUM	SUM OF 001 AND 002	Sum		39.116219	-115.174572	NOT APPLICABLE

Permit History/Description of Proposed Action
The Permittee, Caesars Palace Hotel and Casino (Caesars) has applied for the renewal of their National Pollutant Discharge Elimination System Permit NV0023191, for their hotel, casino, and shopping complex located at 3570 South Las Vegas Boulevard, in Las Vegas, within Clark County, Nevada. The Permittee proposes to continue to discharge intercepted groundwater to the Flamingo Wash, which empties into the Las Vegas Wash, via the Clark County storm drain system.

This permit was first issued on June 11, 2002. The most recent permit was issued on September 1, 2015, and expired on August 31, 2020; the permit has been administratively continued since.

Facility Overview
The facility operates two (2) dewatering systems including the Valet Parking Garage System (Outfall 001) and the Forum Shops System (Outfall 002). The systems are designed to accumulate and remove groundwater intrusions to protect the structural integrity of the below grade structures at both the parking garage and Forum Shops. The site has been dewatering for over 23 years to protect the structural integrity of the parking garage and Forum Shops. The water is collected via passive drains installed at each location and discharged to the municipal storm drain system. Treatment is required due to the presence of organic contaminants, including tetrachloroethylene (PCE) and trichloroethylene (TCE). Historical records indicate a portion of the site was previously occupied by a gas station and dry-cleaning facility with a small contaminant

plume remaining. Treatment is done via sediment filtration and carbon adsorption. The dewatering treatment system, at the parking garage, has a capacity of 288,000 gallons per day (Gal/d), while the system at the Forum Shops has a capacity of 144,000 Gal/d. However, the Permittee applied for reduced flow rate limits of less than 182,000 Gal/d (parking garage) and less than or equal to 68,000 Gal/d (Forum Shops) as the observed total discharge rate, taken from both outfalls, has always been below 250,000 Gal/d.

Groundwater is collected via a French drain system and routed to sumps. The sumps are monitored by electronic high-water alarm systems. Each dewatering system consists of a wet well containing two pumps that pump contaminated water through two carbon canisters for treatment prior to disposal into the storm drain system. The wet well pumps are set to automatically pump at a certain set point, and each pump is used in a leadlag configuration. If the flow increases where one pump cannot keep up, the other pump will start and pump until it reaches a predetermined level within the wet well. The groundwater collected by the sumps is pumped to and treated by granular activated carbon (GAC) filtration systems, which are setup in series so the polluted water flows through one canister and then through the adjacent canister. The treated water then flows through a totalizing meter prior to being discharged into the Clark County storm drain system.

Caesars Operation and Maintenance (O&M) Manual was last reviewed and approved on December 9, 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 three months from the date of permit issuance.

Outfall Summary
Outfall CC2 - This internal outfall, at the parking garage, is for measuring the incoming groundwater prior to treatment.

Outfall CC3 - This internal outfall, at the Forum Shops, is for measuring the incoming groundwater prior to treatment.

Outfall 001 – This external outfall is for the discharge of treated intercepted groundwater to a storm drain drop inlet located in the parking garage.

Outfall 002 – This external outfall is for the discharge of treated intercepted groundwater from the Forum Shops.

Effluent Characterization
Nevada State Network Discharge Monitoring Report (NetDMR) data, as reported from the years January 2019 to December 2024, was reviewed as part of this permit renewal process. The flow rates listed below, under each outfall, were averaged during the period reviewed. There were no exceedances of the permitted flow rates (Outfall 001 - 182,000 Gal/d and Outfall 002 - 68,000 Gal/d) reported for either one of the outfalls. The following values are based on the averaged, reported numbers spanning the period referenced above.

Notes:
mg/L = Milligrams per Liter
Gal/d = Gallons per Day
S.U.= Standard Units
MTBE = Methyl tert-butyl ether
TDS = Total Dissolved Solids
TIN = Total Inorganic Nitrogen
TPH = Total Petroleum Hydrocarbons
VOC = Volatile Organic Compounds

Outfall 001 (Parking Garage):
Flow Rate: 55,575 Gal/d

Barium: 0.02 mg/L
Boron: 0.43 mg/L
Chloroform: 2.05 mg/L
Fluoride: 0.44 mg/L
Manganese: 57.60 mg/L
Molybdenum: 0.02 mg/L
Nitrate: 5.48 mg/L
Nitrogen: 6.27 mg/L
pH: 7.87 S.U.
Selenium: 0.13 mg/L
TDS: 1,892 mg/L
TIN: 6.27 mg/L
Zinc, total: 0.007 mg/L

Many of the Total Inorganics, TPHs, and VOCs, apart from those listed above, reported during the same period, were below detectable levels.

Outfall 002 (Forum Shops):
Flow Rate: 14,630 Gal/d
Barium: 0.034 mg/L
Boron: 0.49 mg/L
Chloroform: 0.38 mg/L
Fluoride: 0.53 mg/L
Manganese: 95.0 mg/L
Molybdenum: 0.009 mg/L
Nitrate: 2.08 mg/L
Nitrogen: 2.73 mg/L
pH: 7.83 S.U.
TDS: 2,240 mg/L
TIN: 6.27 mg/L
Zinc, total: 0.083 mg/L

Many of the Total Inorganics, TPHs, and VOCs, apart from those listed above, reported during the same period, were below detectable levels.

Data reviewed during the permit renewal 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.

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, Iron, Manganese, PCE, Selenium, TCE, TDS, Benzene, Ethylbenzene, Methyl ter-butyl ether (MTBE), Toluene, and Xylenes.

Receiving Water
The treated groundwater is discharged into a Clark County storm drain inlet, and into the Flamingo Wash, which eventually discharges to the Upper Las Vegas Wash. Water quality standards (WQSs) for the Flamingo Wash are delineated under the Nevada 2020 - 2022 Water Quality Integrated Report (WQIR), published by the Nevada Division of Environmental Protection's Bureau of Water Quality Planning, while the Upper Las Vegas Wash water quality standards are specified in Nevada Administrative Code (NAC) 445A.2156.

Applicable Water Quality Standards/Beneficial Uses
The 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 WQIR, the following beneficial uses for the Flamingo Wash are not supported:
• The Aquatic Life beneficial use is impaired by 96-hour Iron, 1-hour Selenium, and 96-hour Selenium.
• The Irrigation beneficial use is impaired by Boron.

According to Nevada's 2020 – 2022 WQIR, the following beneficial uses for the Las Vegas Wash above Treatment Plants are not supported:
• The Aquatic Life beneficial use is impaired by 96-hour Iron, 1-hour Selenium, 96-hour Selenium, and TDS.
• The Irrigation beneficial use is impaired by Boron.
• The Recreation Not Involving Contact with the Water beneficial use is impaired by *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 TMDLs apply 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 (asN) 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 loads to the Las Vegas Wash.

Compliance History
The facility has been in substantial compliance during the reporting period spanning January 2019 to December 2024.

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

Discharge Limitations Table for Sample Location 001 (Parking Garage) 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	M&R Gallons per Day (gal/d)		Effluent Gross	001	Continuous	METER
Flow rate	Daily Maximum	< 182000 Gallons per Day (gal/d)		Effluent Gross	001	Continuous	METER

Discharge Limitations Table for Sample Location 001 (Parking Garage) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Benzene	Daily Maximum		<= 5 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Boron, total recoverable	Daily Maximum		<= 750 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Ethylbenzene	Daily Maximum		<= 100 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Iron, total recoverable	Daily Maximum		<= 1000 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Manganese, total recoverable	Daily Maximum		<= 200 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Nitrogen, ammonia total (as N)	Daily Maximum	M&R Pounds per Day (lb/d)[2]	M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
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)[2]	M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT

Discharge Limitations Table for Sample Location 001 (Parking Garage) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Selenium, dissolved [as Se]	Daily Maximum		<= 6.3 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		<= 3000 Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Methyl tert-butyl ether	Daily Maximum		<= 20 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Toluene	Daily Maximum		<= 100 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Tetrachloroethylene	Daily Maximum		<= 5 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Trichloroethylene	Daily Maximum		<= 5 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT
Xylene (mix of m+o+p)[1]	Daily Maximum		<= 200 Micrograms per Liter (ug/L)	Effluent Gross	001	Quarterly	DISCRT

Notes (Discharge Limitations Table):

1. Total xylenes.
2. Loading (lbs) = Quarterly Volume Discharged (Million Gallons) × Average Concentration (mg/L) × 8.34.

Discharge Limitations Table for Sample Location 001 (Parking Garage) 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 (as Sb)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
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
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
Lead, total recoverable	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 (Parking Garage) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Mercury, total recoverable	Daily Maximum		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
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
Thallium, total (as Tl)	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
.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
			M&R				

Discharge Limitations Table for Sample Location 001 (Parking Garage) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Chlordane (tech mix. and metabolites)	Daily Maximum		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
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
			M&R				

Discharge Limitations Table for Sample Location 001 (Parking Garage) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Malathion	Daily Maximum		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
Hydrocarbons, total petroleum	Daily Maximum		M&R Milligrams per Liter (mg/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
			M&R				

Discharge Limitations Table for Sample Location 001 (Parking Garage) To Be Reported Once During The Permit Term

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

Discharge Limitations Table for Sample Location 001 (Parking Garage) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
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
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
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
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
trans-1,2-Dichloroethylene	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 (Parking Garage) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
trans-1,3-Dichloropropene	Daily Maximum		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

Discharge Limitations Table for Sample Location 002 (Forum Shops) 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	M&R Gallons per Day (gal/d)		Effluent Gross	002	Continuous	METER
Flow rate	Daily Maximum	<= 68000 Gallons per Day (gal/d)		Effluent Gross	002	Continuous	METER

Discharge Limitations Table for Sample Location 002 (Forum Shops) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Benzene	Daily Maximum		<= 5 Micrograms per Liter (ug/L)	Effluent Gross	002	Quarterly	DISCRT
Boron, total recoverable	Daily Maximum		<= 750 Micrograms per Liter (ug/L)	Effluent Gross	002	Quarterly	DISCRT
Iron, total recoverable	Daily Maximum		<= 1000 Micrograms per Liter (ug/L)	Effluent Gross	002	Quarterly	DISCRT
Manganese, total (as Mn)	Daily Maximum		<= 200 Micrograms per Liter (ug/L)	Effluent Gross	002	Quarterly	DISCRT
Nitrogen, ammonia total (as N)	Daily Maximum	M&R Pounds per Day (lb/d)[2]	M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Quarterly	DISCRT
Nitrogen, inorganic total	Daily Maximum		<= 20 Milligrams per Liter (mg/L)	Effluent Gross	002	Quarterly	DISCRT
Nitrogen, nitrate total (as N)	Daily Maximum		<= 90 Milligrams per Liter (mg/L)	Effluent Gross	002	Quarterly	DISCRT
Nitrogen, nitrite total (as N)	Daily Maximum		<= 5 Milligrams per Liter (mg/L)	Effluent Gross	002	Quarterly	DISCRT
pH, maximum	Daily Maximum		<= 9.0 Standard Units (SU)	Effluent Gross	002	Quarterly	DISCRT
pH, minimum	Daily Minimum		>= 6.5 Standard Units (SU)	Effluent Gross	002	Quarterly	DISCRT
Phosphorus, total (as P)	Daily Maximum	M&R Pounds per Day (lb/d)[2]	M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Quarterly	DISCRT
Selenium, dissolved [as Se]	Daily Maximum		<= 6.3 Micrograms per Liter (ug/L)	Effluent Gross	002	Quarterly	DISCRT

Discharge Limitations Table for Sample Location 002 (Forum Shops) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Solids, total dissolved	Daily Maximum		<= 3000 Milligrams per Liter (mg/L)	Effluent Gross	002	Quarterly	DISCRT
Ethylbenzene	Daily Maximum		<= 100 Micrograms per Liter (ug/L)	Effluent Gross	002	Quarterly	DISCRT
Methyl tert-butyl ether	Daily Maximum		<= 20 Micrograms per Liter (ug/L)	Effluent Gross	002	Quarterly	DISCRT
Tetrachloroethylene	Daily Maximum		<= 5 Micrograms per Liter (ug/L)	Effluent Gross	002	Quarterly	DISCRT
Toluene	Daily Maximum		<= 100 Micrograms per Liter (ug/L)	Effluent Gross	002	Quarterly	DISCRT
Trichloroethylene	Daily Maximum		<= 5 Micrograms per Liter (ug/L)	Effluent Gross	002	Quarterly	DISCRT
Xylene (mix of m+o+p)[1]	Daily Maximum		<= 200 Micrograms per Liter (ug/L)	Effluent Gross	002	Quarterly	DISCRT

Notes (Discharge Limitations Table):

1. Total xylenes.
2. Loading (lbs) = Quarterly Volume Discharged (Million Gallons) × Average Concentration (mg/L) × 8.34.

Discharge Limitations Table for Sample Location 002 (Forum Shops) 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 (as Sb)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Arsenic, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Beryllium, total recoverable (as Be)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Cadmium, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Chromium, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Chromium, Hexavalent [As CR] (Chromium (VI))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Chromium, Trivalent [As CR] (Chromium (III))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Copper, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Cyanide, total (as CN)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Fluoride, total (as F)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Lead, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 002 (Forum Shops) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Manganese, total (as Mn)	Daily Maximum		Milligrams per Liter (mg/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Mercury, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Molybdenum, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Nickel, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Silver total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Sulfide, total (as S)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Thallium, total (as Tl)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Zinc, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Acrolein	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Aldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
.alpha.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 002 (Forum Shops) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
.beta.-Endosulfan	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Chlordane (tech mix. and metabolites)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Chlorpyrifos	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
4,4-DDT	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Demeton	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Diazinon	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Dieldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Endrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Azinphos-Methyl (Guthion)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Heptachlor	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Heptachlor epoxide	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 002 (Forum Shops) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Lindane	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Malathion	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Methoxychlor	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Mirex	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Nonylphenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Parathion	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Pentachlorophenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Polychlorinated biphenyls (PCBs)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Toxaphene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Tributyltin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Hydrocarbons, total petroleum	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 002 (Forum Shops) To Be Reported Once During The Permit Term

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	002	Once Per Permit Term	DISCRT
1,1-Dichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
1,1,1-Trichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
1,1,2-Trichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
1,1,2,2-Tetrachloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
1,2-Dichlorobenzene (O-Dichlorobenzene)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
1,2-Dichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
1,2-Dichloropropane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
1,3-Dichlorobenzene (M-Dichlorobenzene)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
1,4-Dichlorobenzene (P-Dichlorobenzene)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
2-Chloroethyl vinyl ether, (mixed)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 002 (Forum Shops) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Bromoform	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Carbon Tetrachloride (Tetrachloromethane (Carbon Tetrachloride))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Chlorobenzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Chloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Chloroform	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
cis-1,3-Dichloropropene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Dibromochloromethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Dichlorobromomethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Methyl bromide (Bromomethane)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Methyl chloride (Chloromethane)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
trans-1,2-Dichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 002 (Forum Shops) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
trans-1,3-Dichloropropene	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Trichlorofluoromethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Vinyl Chloride (Chloroethylene (Vinyl))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT
Methylene chloride	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	002	Once Per Permit Term	DISCRT

Discharge Limitations Table for Sample Location Cc2 (Influent Groundwater-Parking Garage) 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	M&R Gallons per Day (gal/d)		Internal Monitoring Point	CC2	Continuous	METER
Flow rate	Daily Maximum	M&R Gallons per Day (gal/d)		Internal Monitoring Point	CC2	Continuous	METER

Discharge Limitations Table for Sample Location Cc2 (Influent Groundwater-Parking Garage) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Benzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC2	Quarterly	DISCRT
Ethylbenzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC2	Quarterly	DISCRT
Methyl tert-butyl ether	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC2	Quarterly	DISCRT
Tetrachloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC2	Quarterly	DISCRT
Toluene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC2	Quarterly	DISCRT
Trichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC2	Quarterly	DISCRT
Xylene (mix of m+o+p)[1]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC2	Quarterly	DISCRT

Notes (Discharge Limitations Table):

1. Total xylenes.

Discharge Limitations Table for Sample Location Cc3 (Influent Groundwater-Forum Shops) 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	M&R Gallons per Day (gal/d)		Internal Monitoring Point	CC3	Continuous	METER
Flow rate	Daily Maximum	M&R Gallons per Day (gal/d)		Internal Monitoring Point	CC3	Continuous	METER

Discharge Limitations Table for Sample Location Cc3 (Influent Groundwater-Forum Shops) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Benzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC3	Quarterly	DISCRT
Ethylbenzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC3	Quarterly	DISCRT
Methyl tert-butyl ether	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC3	Quarterly	DISCRT
Tetrachloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC3	Quarterly	DISCRT
Toluene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC3	Quarterly	DISCRT
Trichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC3	Quarterly	DISCRT
Xylene (mix of m+o+p)[1]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	CC3	Quarterly	DISCRT

Notes (Discharge Limitations Table):

1. Total xylenes.

Discharge Limitations Table for Sample Location Sum (Sum Of Outfalls 001 & 002) 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	M&R Million Gallons per Day (Mgal/d)		Effluent Gross	SUM	Monthly	CALCTD
Flow rate	Daily Maximum	M&R Million Gallons per Day (Mgal/d)		Effluent Gross	SUM	Monthly	CALCTD

Summary of Changes From Previous Permit
Under Outfall 001 (Parking Garage) and Outfall 002 (Forum Shops) To Be Reported Quarterly the following changes, additions, or deletions were made:

CHANGED - All the VOCs originally listed under this reporting period for both outfalls were moved to a “Once During the Permit Term” reporting period for each associated outfall, due to their non-detect results during the past five years, apart from Ethylbenzene, MTBE, Toluene, Tetrachloroethylene, Total Xylenes, Trichloroethylene, and Benzene.

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

ADDED – Manganese, total recoverable, with a “Daily Maximum” Base, a “<=200 Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “001” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Nitrogen, ammonia total (as N), with a “Daily Maximum” Base, ADDED “M&R Pounds Per Day (lb/d)” Quantity, under the Discharge Limitations. The remaining parameters were not changed.

ADDED – Nitrogen, nitrate total (as N), with a “Daily Maximum” Base, a “<=90 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “001” or "002" Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Nitrogen, nitrite total (as N), with a “Daily Maximum” Base, a “5 Milligrams per Liter (mg/L)” Concentration, an ‘Effluent Gross” Monitoring Location, a “001” or "002" Sample Point, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Phosphorus, total (as P), with a “Daily Maximum” Base, ADDED “M&R Pounds Per Day (lb/d)” Quantity, under the Discharge Limitations. The remaining parameters were not changed.

CHANGED – Solids, total dissolved, with a “Daily Maximum” Base, FROM “M&R Milligrams per Liter (mg/L)” Concentration TO a “3,000 Milligrams per Liter (mg/L)” Concentration. The remaining parameters were not changed.

CHANGED - Outfall 001 (Parking Garage) and Outfall 002 (Forum Shops) To Be Reported “Annually” was changed to a “Once During the Permit Term” reporting period.

ADDED - All associated parameters, being the Inorganic Chemicals listed under the Annual reporting table, were updated to this new reporting period; except for Selenium, which was moved to the quarterly reporting period (see the Selenium listing above for additional information); no other changes were made to discharge limitations or monitoring requirements for these parameters.

Under Outfall 001 (Parking Garage) and Outfall 002 (Forum Shops) To Be Reported Once During the Permit Term” the following parameters were added:

ADDED - All the VOCs originally listed under the “Quarterly” reporting period for both outfalls were moved to a “Once During the Permit Term” reporting period for the same associated outfalls, due to their non-detect results during the past five years, apart from Ethylbenzene, MTBE, Toluene, Tetrachloroethylene, Total Xylenes, Trichloroethylene, and Benzene which are still to be reported quarterly.

ADDED – The Organic Chemicals listed under NAC 445A.1236, associated with the Aquatic Life, Irrigation and Watering of Livestock beneficial uses, as applicable to the Water Quality Standards for the Las Vegas Wash at the Historic Lateral, 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 Permit Term” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Outfall SUM to be the total of the flow rate total of both Outfalls 001 and 002.

ADDED – Flow rate, with a “30-Day Average” Base, a “M&R Million Gallons per Day (Mgal/d)” Quantity, an “Effluent Gross” Monitoring Location, a “SUM” Sample Location, a “Monthly” Measurement Frequency, and a “Calctd” Sample Type.

ADDED – Flow rate, with a “Daily Maximum” Base, a “M&R Million Gallons per Day (Mgal/d)” Quantity, an “Effluent Gross” Monitoring Location, a “SUM” Sample Location, a “Monthly” Measurement Frequency, and a “Calctd” Sample Type.

ADDED – Outfall CC2 (Influent Groundwater – Parking Garage) To Be Reported Monthly with the following parameters:

ADDED – Flow rate, with a “30-Day Average” Base, a “M&R Million Gallons per Day (Mgal/d)” Quantity, an “Internal Monitoring Point” Monitoring Location, a “CC2” Sample Location, a “Monthly” Measurement Frequency, and a “Meter” Sample Type.

ADDED – Flow rate, with a “Daily Maximum” Base, a “M&R Million Gallons per Day (Mgal/d)” Quantity, an “Internal Monitoring Point” Monitoring Location, a “CC2” Sample Location, a “Monthly” Measurement Frequency, and a “Meter” Sample Type.

ADDED – Outfall CC3 (Influent Groundwater – Forum Shops) To Be Reported Monthly with the following parameters:

ADDED – Flow rate, with a “30-Day Average” Base, a “M&R Million Gallons per Day (Mgal/d)” Quantity, an “Internal Monitoring Point” Monitoring Location, a “CC3” Sample Location, a “Monthly” Measurement Frequency, and a “Meter” Sample Type.

ADDED – Flow rate, with a “Daily Maximum” Base, a “M&R Million Gallons per Day (Mgal/d)” Quantity, an “Internal Monitoring Point” Monitoring Location, a “CC3” Sample Location, a “Monthly” Measurement Frequency, and a “Meter” Sample Type.

ADDED – Outfall CC2 (Influent Groundwater – Parking Garage) To Be Reported Quarterly with the following parameters:

ADDED – Benzene, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC2” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Ethylbenzene, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC2” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Methyl tert-butyl ether, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC2” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Tetrachloroethylene, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC2” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Toluene, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC2” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Trichloroethylene, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC2” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Xylene (mix of m+o+p)1, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC2” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.
Along with the footnote:
ADDED – 1. Total xylenes.

ADDED – Outfall CC3 (Influent Groundwater – Forum Shops) To Be Reported Quarterly with the following parameters:

ADDED – Benzene, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC3” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Ethylbenzene, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC3” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Methyl tert-butyl ether, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC3” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Tetrachloroethylene, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC3” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Toluene, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC3” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Trichloroethylene, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)”

Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC3” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Xylene (mix of m+o+p)1, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Internal Monitoring Point” Monitoring Location, a “CC3” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

Along with the footnote:
ADDED – 1. Total xylenes.

Under the Schedule of Compliance Table the following items were added:

1. Preliminary Sampling and Basis of Design (approx. first 2-3 months)
- Conduct selenium sampling of influent/effluent.
- Evaluate existing data in combination with new results to develop a basis of design for selenium control (e.g., treatment or other feasible alternatives).
- Prepare and submit a technical memorandum summarizing findings and recommending a pilot-scale approach.
- Within 3 months from the date the permit is issued, provide TCE with the Technical Memorandum.

2. Pilot Testing of Selenium Treatment/Control Technologies (approx. next 2–3 months)
- Implement pilot testing of one or more candidate technologies identified in the basis-of-design evaluation.
- Monitor pilot performance relative to the 6.3 µg/L criterion and assess operational and cost considerations.
- Within 6 months from the date the permit is issued, provide TCE with a summary of the results from pilot testing and the proposed best technology/preliminary design for treatment.

3. System Design and Implementation (approx. next 2–3 months)
- Complete detailed design of the selected selenium treatment/control system based on pilot results.
- Procure and install the necessary equipment and integrate it into the existing system.
- Provide NDEP with design documentation and an implementation update as key milestones are achieved.
- Within 9 months from the date the permit is issued or prior to construction, provide TCE with plans and specifications for the treatment system.

4. Start-Up, Optimization, and Demonstration of Compliance (approx. final 2–3 months)
- Initiate system start-up and optimization.
- Conduct confirmatory monitoring to demonstrate consistent achievement of the selenium effluent limitation.
- Within 12 months from the date the permit is issued, provide TCE with an updated Operations & Maintenance Manual.

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

Water Quality Based Effluent Limitations
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. Since the discharge is not associated with treated wastewater, sampling of fecal coliform and E. coli are not required.

The proposed permit removes the daily maximum limit of 20 mg/L for 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 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 a daily maximum limit of 6.3 ug/L for Selenium. This limitation for Selenium is due to the 303(d) listing of this parameter being a pollutant of concern for the Flamingo Wash, being as it is the receiving water, along with the Las Vegas Wash. The sampling frequency has been increased from annual to quarterly.

Per NAC 445A.1236, the standards for toxic materials 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 materials with water quality criteria to protect the aquatic life, irrigation, and watering of livestock beneficial uses apply. Furthermore, the 96-hour limit for the beneficial uses for aquatic life limits are used, unless there was no 96-hour limit listed for that constituent in which case the 1-hour limit was used. Except for iron and selenium for Outfall 001 and manganese Outfall 002, the rest of the applicable toxic materials shall be sampled for once a year. 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, and may increase the associated sampling frequency, during the next permit renewal cycle.

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 200 ug/L for Manganese, at Outfall 001 (parking garage), as prescribed at NAC 445A.1236 to protect the irrigation beneficial use, and is based on the RPA findings.

The proposed permit retains a limit of 5 ug/L for PCE as previously established by the Division.

The proposed permit retains a limit of 5 ug/L for TCE as previously established by the Division.

The proposed permit includes 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.

NAC 445A.2156 includes a RMHQ for TDS in the Las Vegas Wash at the Historic Lateral of 1,900 mg/L with at least 95 percent of samples being equal to or less than the single value. NAC 445A.2156 also includes water quality criterion for TDS of 3,000 mg/L, as a single value, to protect the watering of livestock beneficial use. From 2019 to 2024, the effluent TDS ranged from 1,543 mg/L to 2,100 mg/L for Outfall 001 and from 1,880 mg/L to 5,072 mg/L for Outfall 002. The current project, by design, does not alter the background TDS, as such the TDS concentration in the effluent is the same as that of the influent. The results of the RPA determined that there is reasonable potential for TDS to exceed the RMHQ and beneficial use standards; however, it is reasonable to expect the effluent not be within the RMHQ standard.

The TDS in the intercepted groundwater is consistent with the assumptions for the natural background water per NAC 445A.120(2), “Natural water conditions may, on occasion, be outside the limits established by standards. The standards adopted in NAC 445A.070 to 445A.2234, inclusive, related to the condition of waters as affected by discharges relating to human activities. It also follows that the intercepted groundwater is consistent with NAC 445A.121(8), which states, “The specified standards are not considered violated when the natural conditions of the receiving water are outside the established limits, including periods of extreme high or low flow.”

Therefore, a limit of 3,000 mg/L for TDS is deemed protective of the receiving water and sufficient to continue to maintain the RMHQ for the Las Vegas Wash.

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.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 January 2019 to December 2024 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 at both outfalls. Manganese also has the potential to cause, or contribute to, instream excursions for Outfall 001. Therefore, limits were included for TDS at Outfalls 001 and 002 and manganese for Outfall 001.

Proposed Water Quality Based Effluent Limits (monthly/weekly/daily)
The permit retains quarterly 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 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 (excluding benzene, ethylbenzene, PCE, toluene, TCE, xylenes, and MTBE). 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.

The permit establishes a concentration limit and quarterly reporting for Selenium.

The proposed permit establishes a concentration limit and the requirement to sample quarterly for Iron.

The proposed permit established a concentration limit and requirement to sample quarterly for Manganese.

Basis for Effluent Limitations
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 sites that had a release of gasoline within a one-mile radius of Caesar's, there is a potential for the constituent to show up in the discharge.

Continued monitoring for TPH is required, even if the levels have been non-detect. 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. All the concentration has now been updated to a Monitor & Report (M&R) concentration, and the sampling period has been decreased to once during the permit term.

The permit retains the requirement to monitor and report VOCs to satisfy anti-backsliding requirements. Based on results being non-detect during the past 5 years, the reporting was changed to "Once During The Permit Term".

Quarterly monitoring and reporting of specific VOCs concentrations in the effluent have been retained from the previous permit, to allow NDEP the continued opportunity to review and ensure degradation of the groundwater does not occur. The Division's technology-based remediation standards for benzene, toluene, ethylbenzene, and total xylenes (BTEX) are 5 ug/L, 100 ug/L, 100 ug/L, and 200 ug/L, are still applicable.

Continued monitoring for PCE and TCE are to satisfy anti-backsliding requirements, and allow for monitoring of the associated contaminant levels in the plumes located under the building.

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. This permit has maintained the same reporting standards. With the five years of non-detect values being reported for the VOCs, excluding benzene, toluene, ethylbenzene, xylenes, PCE, TCE, and MTBE, the reporting requirements were changed to a "Once During the Permit Term" and additional parameters added 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 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 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 this 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
This site is a NDEP Bureau of Corrective Actions (BCA) site with an active solvent plume (8-000064) undergoing remediation. In addition, there are three other BCA sites (8-000019, 8-001467, and H-001063) located within a one-mile radius of this facility. BCA staff do not expect that the dewatering activity, associated with this permit, will have adverse effects on their on-going remediation sites.

Groundwater contaminant plume 8-000064 is a residual chlorinated solvent plume located under the Caesars' property, composed of both PCE and TCE. Based on the lab reports received, reported average levels for both PCE and TCE contaminants, as sampled from the incoming groundwater prior to treatment (influent), was an average of 2 ug/L at the parking garage and non-detect at the Forum Shops, during the years reviewed for this permit renewal (January 2019 – December 2024). Continued monitoring shall be required during the upcoming permit cycle. The water is treated by a GAC system (as explained under the Facility Description section).

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 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 prepared and stamped by a licensed, qualified Nevada engineer (P.E.) or minimally prepared and reviewed by a qualified professional.	5/1/2026
2	Preliminary Sampling and Basis of Design (approx. first 2-3 months) • Conduct selenium sampling of influent/effluent. • Evaluate existing data in combination with new results to develop a basis of design for selenium control (e.g., treatment or other feasible alternatives). • Prepare and submit a technical memorandum summarizing findings and recommending a pilot-scale approach. • Within 3 months from the date the permit is issued, provide TCE with the Technical Memorandum.	5/1/2026
3	Pilot Testing of Selenium Treatment/Control Technologies (approx. next 2–3 months) • Implement pilot testing of one or more candidate technologies identified in the basis-of-design evaluation. • Monitor pilot performance relative to the 6.3 µg/L criterion and assess operational and cost considerations. • Within 6 months from the date the permit is issued, provide TCE with a summary of the results from pilot testing and the proposed best technology/preliminary design for treatment.	8/1/2026
4	System Design and Implementation (approx. next 2–3 months) • Complete detailed design of the selected selenium treatment/control system based on pilot results. • Procure and install the necessary equipment and integrate it into the existing system. • Provide NDEP with design documentation and an implementation update as key milestones are achieved. • Within 9 months from the date the permit is issued or prior to construction, provide TCE with plans and specifications for the treatment system.	11/1/2026
5	Start-Up, Optimization, and Demonstration of Compliance (approx. final 2–3 months) • Initiate system start-up and optimization. • Conduct confirmatory monitoring to demonstrate consistent achievement of the selenium effluent limitation. • Within 12 months from the date the permit is issued, provide TCE with an updated Operations & Maintenance Manual.	2/1/2027

Deliverable Schedule:

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

Item #	Description	Interval	First Scheduled Due Date
1	Annual Reports	Annually	1/28/2027
2	Quarterly Reports	Quarterly	4/28/2026

Procedures for Public Comment:

The Notice of the Division's intent to issue a permit authorizing the facility to discharge to groundwater of the State of Nevada subject to the conditions contained within the permit, is being mailed to interested persons on our mailing list and will be posted on our website at https://ndep.nv.gov/posts. Anyone wishing to comment on the proposed permit can do so in writing until 5:00 P.M. **2/24/2026,** 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.

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: **1/14/2026**
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?
Copper, Total Recoverable	ug/L	6	1.5	30	Chronic Aquatic Life	No
Manganese, Total Recoverable	ug/L	11	764.5	200	Irrigation	**Yes**
Chloroform	ug/L	23	24.9	No Criteria		No
Boron	ug/L	7	1.81	750	Irrigation	No
Fluoride	ug/L	7	3.51	No Criteria		No
Nitrate, Total (as N)	mg/L	7	22.68	90	QC to Protect Beneficial Us	No
Nitrogen, total inorganic	mg/L	25	11.15	20	RMHQ	No

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	5	0.2	30	Chronic Aquatic Life	No
Boron	ug/L	5	2.22	750	Irrigation	No
Fluoride	ug/L	5	3.56	No Criteria		No
Nitrate, Total (as N)	mg/L	7	10.98	90	QC to Protect Beneficial Us	No
Nitrogen, total inorganic	mg/L	22	11.85	20	RMHQ	No
Phosphorus, Total (as P)	mg/L	23	8.34	No Criteria		No