FACTSHEET
(pursuant to NAC 445A.236)

Permittee Name: TROPICANA EAST SHOPPING CENTER LP

400 SOUTH RAMPART BOULEVARD, SUITE 220
LAS VEGAS, NV 89145

Permit Number: NV0024227

Permit Type: NEW MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURAL DISCHARGE

Designation: MINOR NPDES

New/Existing: EXISTING

Location: FORMER PJS CLEANERS, CLARK
2470 EAST TROPICANA AVE, LAS VEGAS, NV 89121
LATITUDE: 36.100836, LONGITUDE: -115.1161
TOWNSHIP: 21S, RANGE: 61E, SECTION: 24

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Latitude	Longitude	Receiving Water
001	SAMPLE PORT 1 INLET LINE TO FIRST CARBON CANISTER	Internal Outfall		36.100773	-115.1161	NONE
002	SAMPLE PORT 2 MID FLUENT SAMPLING BETWEEN CARBON CANISTER	Internal Outfall		36.100773	-115.1161	NONE
003	VAN BUSKIRK CHANNEL	External Outfall		36.100773	-115.116683	FLAMINGO WASH, LAS VEGAS WASH , LAKE MEAD

Permit History/Description of Proposed Action
The Permittee, Tropicana East Shopping Center LP, has applied for the renewal of their National Pollutant Discharge Elimination System Permit NV0024227, for the former PJ's Cleaners, located at 2470 East Tropicana Avenue, in Las Vegas, within Clark County, Nevada. The Permittee proposes to continue to discharge treated, intercepted groundwater to the Las Vegas Wash via the Clark County storm drain system.

This permit was first issued on March 1, 2017, and expired on February 28, 2022; the permit has been administratively continued since.

Facility Overview
In September 2009, at the former PJ's Cleaners site, an unknown quantity of tetrachloroethylene (PCE) was discovered. The source of PCE contamination was determined to be various historic dry-cleaning operations with PJ's Cleaners as the latest operator. PJ's Cleaners operated at the site from 2006 through April 2015. Dry-cleaning operations are no longer performed at this location.

To address the PCE release, groundwater extraction well (PT1) was installed on April 11, 2012, at the northern portion of the adjacent vacant lot to the northeast. The extraction well was drilled to a depth of 30 feet below ground surface (bgs). In 2017 an additional groundwater extraction well (PT2) drilled to a depth of 60 feet bgs and a groundwater remediation system was constructed on the northern end of the adjacent

vacant parcel to prevent further offsite migration of the PCE plume. In April 2022, construction of 5 additional groundwater extraction wells commenced, in addition to the expansion of the groundwater remediation system compound, a soil vapor extraction (SVE) system was installed. Construction was completed and the groundwater remediation system was restarted in July 2023. There are currently 32 active monitoring wells onsite and offsite. Monitoring wells are sampled on a quarterly basis for PCE, Trichloroethene (TCE), cis 1,2-dichloroethene (DCE), and Vinyl Chloride (VC).

The PCE and TCE impacted groundwater is extracted from the remediation wells via a groundwater pump and treat system installed at the subject site. The recovered groundwater stream is piped through hoses to the top of the wellhead and connects to solid three-inch polyvinyl chloride (PVC) piping, which runs underground to the remediation compound. At the remediation compound, the piping rises above ground and discharges into the 1,500-gallon polyethylene groundwater process tank. From the tank, the extracted groundwater is routed through a transfer pump, and through two bag filters in series to separate fine soils from the groundwater. Groundwater is then polished by two (2) 2,000-pound and two (2) 1,000-pound aqueous carbon vessels loaded with granulated active carbon (GAC) connected in series. From the aqueous GAC vessels, the treated groundwater effluent stream is then pumped through a flow totalizer and subsurface conveyance piping prior to discharge to a concrete-lined, storm channel owned and operated by Clark County. The storm channel is located north of East Tropicana Avenue, between the vacant lot and the Tropicana East Shopping Center. The storm channel then connects to the storm sewer system via a concrete-lined, storm drain channel (Van Buskirk Channel), which outlets into the Flamingo Wash, and eventually flows into the Las Vegas Wash.

On September 27, 2024, PJ's Cleaners remediation contractor, Atlas Technical Consultants, started using an in-situ chemical reduction (ISCR) system and the site is not currently using their pump-to-treat system nor discharging to the Las Vegas Wash. An ISCR treats groundwater discharge using a chemical reductant to destroy contaminants within the groundwater before they can discharge into surface water. This "in-place" treatment is often used to prevent contaminant plumes from migrating off-site toward a river, stream, or other body of water. Until the remediation case is closed, the Permittee wishes to maintain the permit with the thought that they may go back to discharging at a future date along with it being a requirement, by the Bureau of Corrective Actions (BCA), to maintain the permit until the site is closed.

Former PJ's Cleaners' Operation and Maintenance (O&M) Manual was last reviewed and approved on June 12, 2017. The Technical, Compliance, and Enforcement Branch of the Bureau of Water Pollution Control requires O&M Manuals to be updated every ten (10) years from the date the O&M Manual was last approved, with an updated O&M Manual due three months from the date of issuance and shall include the ISCR system information.

Outfall Summary

Outfall 001 – This internal outfall is to measure the flow rate and incoming groundwater pollutants.

Outfall 002 – This internal outfall is located between the two carbon canisters.

Outfall 003 – This external outfall is the measurement of the treated groundwater being discharged into Clark County's storm drain channel (Van Buskirk Channel).

Effluent Characterization

Nevada State Network Discharge Monitoring Report (NetDMR) data, as reported from the years July 2020 to September 2024, was reviewed as part of this permit renewal process. The reported long-term average discharge flow rate at Outfall 003 was 6.58 gallons per minute (gpm). The reported daily maximum flow rate was 8.29 gpm; with seventeen (17) instances of operation shutdown and ten (10) instances of no discharge reported. Based on the numbers reported, there were no exceedances of this limit.

Notes:
mg/L = Milligrams per Liter
ug/L = Micrograms per Liter

Gal/min = gallons per minute
S.U.= Standard Units
PCE = Tetrachloroethylene
TCE = Trichloroethylene
TDS = Total Dissolved Solids
TPH = Total Petroleum Hydrocarbons

Outfall 001 (Influent – Incoming Groundwater):
Flow Rate: 7.84 gpm
Chloroform: 48.59 ug/L
pH: 7.60 S.U.
PCE: 559 ug/L
TCE: 13.15 ug/L
TDS: 3,068 mg/L
TPH: 7.98 mg/L

Outfall 002 (partially treated groundwater – between carbon canisters):
Chloroform: Below Detection
PCE: 4.17 ug/L
pH: 7.37 S.U.
TCE: Below Detection
TDS: 3,057 mg/L
TPH: 3.41 mg/L

Outfall 003 (Treated Groundwater/Effluent):
Flow Rate: 8.29 gpm
Chloroform: Below Detection
PCE: 1.80 ug/L
pH:7.37 S.U.
TCE: Below Detection
TDS: 3,034 mg/L
TPH: 0.21 mg/L

The removal rates achieved by the canister treatment system were approximately 97% for TPH, 99.7% for PCE, and 100% for TCE.

Pollutants of Concern
Pollutants of concern is 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 Chloroform, PCE, TCE, and TPH.

Receiving Water
The treated groundwater is discharged into a Clark County storm drain channel (Van Buskirk Channel), and into the Flamingo Wash, which eventually discharges to the Upper Las Vegas Wash.

Applicable Water Quality Standards/Beneficial Uses
The water quality standards (WQSs) for the nearest downstream control point, “Las Vegas Wash at the Historic Lateral” (NAC 445A.2156) apply. WQSs for this control point include 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 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 the Nevada's 2020 – 2022 WQIR, the following beneficial uses for the Las Vegas Wash above the Treatment Plants are not supported:
• The Aquatic Life beneficial use is impaired by 96-hour Iron, 1-hour Selenium, 96-hour Selenium, and TDS
• The Irrigation beneficial use is impaired by Boron.
• The Recreation Not Involving Contact with the Water beneficial use is impaired by *Escherichia coli* (*E. coli)*.
• The Watering of Livestock beneficial use is impaired by TDS.

TMDL
Per Section 303(d)(1)(C) of the Clean Water Act (CWA), states are required to develop Total Maximum Daily Loads (TMDLs) for parameters that do not meet water quality standards for a water body. TMDLs are implemented during the permitting process by limiting the load of those parameters 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 (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 Phosphorus 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 Permittee has been in compliance during the period reviewed spanning July 2020 through September 2024.

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

Discharge Limitations Table for Sample Location 001 (Sample Port 1 Inlet Line To First Carbon Canister) To Be Reported Monthly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Flow rate	Daily Maximum	<= 173 Gallons per Day (gal/d)		Internal Monitoring Point	001	Continuous	METER
Flow rate	30 Day Average	<= 125 Gallons per Day (gal/d)		Internal Monitoring Point	001	Continuous	METER

Discharge Limitations Table for Sample Location 001 (Sample Port 1 Inlet Line To First Carbon Canister) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Chloroform	Daily Maximum		M&R Micrograms per Liter (ug/L)	Intake from Well	001	Quarterly	DISCRT
Hydrocarbons, total petroleum[1]	Daily Maximum		M&R Milligrams per Liter (mg/L)	Intake from Well	001	Quarterly	DISCRT
pH	Value		M&R Standard Units (SU)	Intake from Well	001	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Intake from Well	001	Quarterly	DISCRT
Tetrachloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Intake from Well	001	Quarterly	DISCRT
Trichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Intake from Well	001	Quarterly	DISCRT

Notes (Discharge Limitations Table):

1. TPH purgeable and extractable, full range C6-C40.

Discharge Limitations Table for Sample Location 002 (Sample Port 2 Mid-Fluent Sampling Between Carbon Canisters) To Be Reported Quarterly

	Discharge Limitations			Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Hydrocarbons, total petroleum[1]	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	002	Quarterly	DISCRT
Tetrachloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	002	Quarterly	DISCRT
Trichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	002	Quarterly	DISCRT
Chloroform	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	002	Quarterly	DISCRT

Notes (Discharge Limitations Table):

1. TPH purgeable and extractable, full range C6-C40.

Discharge Limitations Table for Sample Location 003 (Van Buskirk Channel - External Outfall) To Be Reported Monthly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Flow rate	Daily Maximum	M&R Gallons per Minute (gal/min)		Effluent Gross	003	Continuous	METER
Flow rate	30 Day Average	M&R Gallons per Minute (gal/min)		Effluent Gross	003	Continuous	METER

Discharge Limitations Table for Sample Location 003 (Van Buskirk - External Outfall) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Boron, total recoverable	Daily Maximum		<= 750 Micrograms per Liter (ug/L)	Effluent Gross	003	Quarterly	DISCRT
Chloroform	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Quarterly	DISCRT
Hydrocarbons, total petroleum[1]	Daily Maximum		<= 1.0 Milligrams per Liter (mg/L)	Effluent Gross	003	Quarterly	DISCRT
Iron, total recoverable	Daily Maximum		<= 1000 Micrograms per Liter (ug/L)	Effluent Gross	003	Quarterly	DISCRT
Nitrogen, ammonia total (as N)	Daily Maximum	M&R Pounds per Day (lb/d)	M&R Milligrams per Liter (mg/L)	Effluent Gross	003	Quarterly	DISCRT
Nitrogen, inorganic total	Daily Maximum		<= 20 Milligrams per Liter (mg/L)	Effluent Gross	003	Quarterly	DISCRT
Nitrogen, nitrate total (as N)	Daily Maximum		<= 90 Milligrams per Liter (mg/L)	Effluent Gross	003	Quarterly	DISCRT
Nitrogen, nitrite total (as N)	Daily Maximum		<= 5 Milligrams per Liter (mg/L)	Effluent Gross	003	Quarterly	DISCRT
pH, maximum	Daily Maximum		<= 9 Standard Units (SU)	Effluent Gross	003	Quarterly	DISCRT
pH, minimum	Daily Minimum		>= 6.5 Standard Units (SU)	Effluent Gross	003	Quarterly	DISCRT
Phosphorus, total (as P)	Daily Maximum	M&R Pounds per Day (lb/d)	M&R Milligrams per Liter (mg/L)	Effluent Gross	003	Quarterly	DISCRT
Selenium, dissolved [as Se]	Daily Maximum		<= 6.3 Micrograms per Liter	Effluent Gross	003	Quarterly	DISCRT

Discharge Limitations Table for Sample Location 003 (Van Buskirk - External Outfall) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
			(ug/L)				
Solids, total dissolved	Daily Maximum		<= 3000 Milligrams per Liter (mg/L)	Effluent Gross	003	Quarterly	DISCRT
Tetrachloroethylene	Daily Maximum		<= 5.0 Micrograms per Liter (ug/L)	Effluent Gross	003	Quarterly	DISCRT
Trichloroethylene	Daily Maximum		<= 5.0 Micrograms per Liter (ug/L)	Effluent Gross	003	Quarterly	DISCRT

Notes (Discharge Limitations Table):

1. TPH, purgeable and extractable, full range C6-C40.

Discharge Limitations Table for Sample Location 003 (Van Buskirk - 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	003	Once Per Permit Term	DISCRT
Beryllium, total recoverable (as Be)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Cadmium, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Chromium, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Chromium, Hexavalent [As CR] (Chromium (VI))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Chromium, Trivalent [As CR] (Chromium (III))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Copper, dissolved (as Cu)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Cyanide, total (as CN)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Fluoride, total (as F)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Lead, dissolved (as Pb)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Manganese, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 003 (Van Buskirk - 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**
Mercury, dissolved (as Hg)	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Molybdenum, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Nickel, total (as Ni)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Silver, total (as Ag)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Sulfide, total (as S)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Zinc, dissolved (as Zn)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Acrolein	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Aldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
.alpha.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
.beta.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Chlordane (tech mix. and metabolites)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 003 (Van Buskirk - 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**
Chlorpyrifos	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
4,4-DDT	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Demeton	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Diazinon	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Dieldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Endrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Azinphos-Methyl (Guthion)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Heptachlor	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Heptachlor epoxide	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Lindane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Malathion	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 003 (Van Buskirk - 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**
Methoxychlor	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Mirex	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Nonylphenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Parathion	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Pentachlorophenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Polychlorinated biphenyls (PCBs)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Toxaphene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Tributyltin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Trichlorofluoromethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
1,1-Dichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
1,1-Dichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 003 (Van Buskirk - 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**
1,1,1-Trichloroethane	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
1,1,2-Trichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
1,1,2,2-Tetrachloroethane	Daily Average		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
1,2-Dichlorobenzene (O-Dichlorobenzene)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
1,2-Dichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
1,2-Dichloropropane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
1,3-Dichlorobenzene (M-Dichlorobenzene)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
1,4-Dichlorobenzene (P-Dichlorobenzene)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
2-Chloroethyl vinyl ether, (mixed)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Benzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Bromoform	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT

Discharge Limitations Table for Sample Location 003 (Van Buskirk - 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**
Carbon Tetrachloride (Tetrachloromethane (Carbon Tetrachloride))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Chlorobenzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Chloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
cis-1,3-Dichloropropene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Dibromochloromethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Dichlorobromomethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Ethylbenzene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Methyl bromide (Bromomethane)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Methyl chloride (Chloromethane)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Methylene chloride	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Toluene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 003 (Van Buskirk - 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**
trans-1,2-Dichloroethylene	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
trans-1,3-Dichloropropene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT
Vinyl Chloride (Chloroethylene (Vinyl))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	003	Once Per Permit Term	DISCRT

Summary of Changes From Previous Permit
Under Outfall 001, Discharge Limitations Table to be Reported “Monthly”, the following parameters were either added, changed or removed:

ADDED - Flow Rate, with a “30-Day Average” Base, a “<=125 Gallons per Minute (gal/min)” Quantity, a “Internal Monitoring Point” Monitoring Location, a “001” Sample Location, a “Continuous” Measurement Frequency, and a “Meter” Sample Type.

CHANGED - Flow Rate, with a “Daily Maximum” Base, from a “M&R Gallons per Minute (gal/min)” to a “173 Gallons per Minute (gal/min)” Quantity, with the other monitoring requirements remaining unchanged.

REMOVED – Chloroform, with a “Daily Maximum” Base.

REMOVED – Hydrocarbons, total petroleum, with a “Daily Maximum” Base.

REMOVED – pH, with a “Value” Base.

REMOVED – Solids, total dissolved, with a “Daily Maximum” Base.

REMOVED - Tetrachloroethylene, with a “Daily Maximum” Base.

REMOVED – Trichloroethylene, with a “Daily Maximum” Base.

Under Outfall 001, Discharge Limitations Table to be Reported “Quarterly”, the following parameters were added:

ADDED – Chloroform, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Intake from Well” Monitoring Location, an “001” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Hydrocarbons, total petroleum, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Intake from Well” Monitoring Location, an “001” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – pH, with a “Value” Base, a “M&R Standard Units (S.U.)” Concentration, a “Intake from Well”

Monitoring Location, an “001” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Solids, total dissolved, with a “Daily Maximum” Base, a “M&R Milligrams per Liter (mg/L)” Concentration, a “Intake from Well” Monitoring Location, an “001” 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 “Intake from Well” Monitoring Location, an “001” 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 “Intake from Well” Monitoring Location, an “001” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

Under Outfall 002, Discharge Limitations Table to be Reported “Monthly” was changed to “Quarterly”, and the following parameters deleted:

REMOVED – Chloroform, with a “Daily Maximum” Base.

REMOVED – pH, with a “Value” Base.

REMOVED – Solids, total dissolved, with a “Daily Maximum” Base.

Under Outfall 003, Discharge Limitations Table to be Reported “Monthly”, the following parameters were either changed or removed:

CHANGED – Flow, in conduit or thru treatment plant, with a “Daily Maximum” Base, was changed from a “173 Gallons per Minute (gal/min)” Quantity to a “M&R Gallons per Minute (gal/min)” Quantity, the other monitoring requirements remained unchanged.

CHANGED – Flow, in conduit or thru treatment plant, with a “30-Day Average” Base, was changed from a “125 Gallons per Minute (gal/min)” Quantity to a “M&R Gallons per Minute (gal/min)” Quantity, the other monitoring requirements remained unchanged.

REMOVED – Chloroform, with a “Daily Maximum” Base.

REMOVED – Hydrocarbons, total petroleum, with a “Daily Maximum” Base.

REMOVED – pH, maximum, with a “Daily Maximum” Base.

REMOVED – pH, minimum, with a “Daily Minimum” Base.

REMOVED – Solids, total dissolved, with a “Daily Maximum” Base.

REMOVED - Tetrachloroethylene, with a “Daily Maximum” Base.

REMOVED – Trichloroethylene, with a “Daily Maximum” Base.

Under Outfall 003, Discharge Limitation Table to be Reported “Quarterly” was added, along with the following parameters:

ADDED – Boron, total recoverable, with a “Daily Maximum” Base, a “<=750 Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “Discrt” Sample Type.

ADDED – Chloroform, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “Discrt” Sample Type.

ADDED – Hydrocarbons, total petroleum, with a “Daily Maximum” Base, a “<=1.0 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “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 “003” Sample Location, a “Quarterly” Measurement Frequency, and “Discrt” Sample Type.

ADDED – Nitrogen, ammonia total (as N), with a “Daily Maximum” Base, a “M&R Pounds per Day (lb/d)” Quantity, a “M&R Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “Discrt” Sample Type.

ADDED – Nitrogen, inorganic total, with a “Daily Maximum” Base, a “<=20 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “Discrt” Sample Type.

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 “003” Sample Location, a “Quarterly” Measurement Frequency, and “Discrt” Sample Type.

ADDED – Nitrogen, nitrite total (as N), with a “Daily Maximum” Base, a “<=5 Milligrams per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “Discrt” Sample Type.

ADDED – pH, maximum, with a “Daily Maximum” Base, a “<=9.0 Standard Units (S.U.)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “Discrt” Sample Type.

ADDED – pH, minimum, with a “Daily Minimum” Base, a “>=6.5 Standard Units (S.U.)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “ Discrt” Sample Type.

ADDED – Phosphorus, total (as P), with a “Daily Maximum” Base, a “M&R Pounds per Day (lb/d)” Quantity, a “M&R Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “Discrt” Sample Type.

ADDED – Selenium, dissolved (as Se), with a “Daily Minimum” Base, a “6.3 Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “ Discrt” Sample Type.

ADDED – Solids, total dissolved, with a “Daily Minimum” Base, a “<=3,000 Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “ Discrt” Sample Type.

ADDED – Tetrachloroethylene, with a “Daily Minimum” Base, a “<=5.0 Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “ Discrt” Sample Type.

ADDED – Trichloroethylene, with a “Daily Minimum” Base, a “<=5.0 Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Quarterly” Measurement Frequency, and “ Discrt” Sample Type.

Under Outfall 003, Discharge Limitations Table to be Reported “Once During the Permit Term” was added, along with the following parameters:

ADDED-Toxic Materials list, including both inorganic and organic chemicals, as defined under NAC 445A.1236, was added with a “Daily Maximum” base, a “Monitor & Report (M&R) Micrograms per Liter (ug/L)” Concentration, An “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Once Per Permit Term” Measurement Frequency, and a “Discrt” Sample Type.

ADDED-Volatile Organic Compounds (VOCs) with a “Daily Maximum” base, a “Monitor & Report (M&R) Micrograms per Liter (ug/L)” Concentration, An “Effluent Gross” Monitoring Location, a “003” Sample Location, a “Once Per Permit Term” Measurement Frequency, and a “Discrt” Sample Type.

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

The proposed permit maintains 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 standards for toxic material (NAC 445A.1236) apply. Most of the toxic materials listed only have water quality criteria to protect the municipal or domestic supply beneficial uses which is 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. All the toxic materials will be permitted for a "M&R" limit with the exception of Iron, Boron,and Selenium. The applicable toxic materials shall be sampled for once a permit term. If, during the next renewal review process, the water quality data shows reasonable potential (via a Reasonable Potential Analysis) for any constituent, the Division will retain that constituent, add the applicable limit, and may increase the sampling frequency for that constituent during the next permit renewal cycle.

The receiving water body, the Las Vegas Wash, has an RMHQ of 95 percent of a single value sample of less than or equal to 1,900 mg/L limit for TDS and a beneficial use standard of less than or equal to 3,000 mg/L, per NAC 445A.2156. From 2020 to 2024, the effluent TDS ranged from 2,240 mg/L to 3,650 mg/L.

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 RPA determined that Outfall 003 has potential to cause, or contribute to, an exceedance above the RMHQ and beneficial use standard for TDS. The TDS in the effluent 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, the proposed permit establishes a limit of 3,000 mg/L for Outfall 003 for TDS, which is deemed protective of the

receiving water.

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.2156 to determine if the discharge has reasonable potential to cause, or contribute to, an excursion above a State WQS.

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 Outfall 003. Therefore, a limit was included for TDS at Outfall 003.

Proposed Water Quality Based Effluent Limits (monthly/weekly/daily)
The proposed permit establishes a once during a permit term sampling frequency of toxic materials as these constituents are listed in NAC 445A.1236. The Division does not expect most of these constituents to be present in the discharge; therefore, once a permit term sampling is deemed sufficient for obtaining initial water quality data for toxic materials.

The proposed permit establishes a daily maximum limit of 750 ug/L for Boron, per NAC 445A.1236, along with it being on the 303(d) list, along with a quarterly reporting requirement.

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

The proposed permit establishes a daily maximum limit of 90 mg/L for nitrate (as N), as per NAC 445.2156, along with a quarterly reporting requirement.

The proposed permit establishes a daily maximum limit of 5 mg/L for nitrite (as N), as per NAC 445.2156, along with a quarterly reporting requirement.

The proposed permit establishes a daily maximum limit of 20 mg/L for total inorganic nitrogen (TIN), as per NAC 445.2156, along with a quarterly reporting requirement.

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. This Selenium limitation was established due to the impairment of Flamingo Wash by this pollutant of concern. The sampling frequency will be quarterly.

Inorganic constituents, included in the toxic materials list, shall be sampled for once during a permit term to obtain initial water quality data. If, during the next renewal review process, the water quality data shows a reasonable potential for any constituent, the Division will retain that constituent, apply the prescribed limit,

and may increase the sampling frequency for that constituent during the next permit renewal cycle.

Basis for Effluent Limitations
The proposed permit retains the requirement to sample TPH due to concern of potential migration of groundwater plumes located within a mile of the discharge location.

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.

Annual monitoring and reporting of VOCs concentrations in the effluent have been established to allow NDEP the continued opportunity to review and ensure degradation of the groundwater does not occur.

Anti-backsliding
Sections 303(d) and 402(o) of the CWA and federal regulations of 40 CFR 122.44(i) prohibit backsliding and require effluent limitations in a reissued permit to be as stringent as those in the previous permit. Reporting for Outfalls 001, 002, and 003 were changed from "monthly" reporting period to a "quarterly" reporting period based on removal rates achieved, Divisional reporting standards are quarterly for nuisance groundwater discharge permits, and based on current treatment technlogy (ISCR) being applied at the site, it is assumed that the levels of contaminants will either be greatly diminished or non-detect.

Antidegradation
The Division has developed an antidegradation regulation that is applied on a statewide basis, and which meets the statutory requirements of Nevada's water pollution control law found at Nevada Revised Statute (NRS) 445A.520 and NRS 565 and is consistent with the federal antidegradation policy found at Title 40 in the CFR section 131.12. The objective of the Division's antidegradation regulation is to prevent degradation of Nevada's surface water and maintain the unique attributes and special characteristics and water quality associated with high-quality waters. This objective is achieved through the implementation of procedures to ensure that water is protected from regulated activities that have the potential to degrade the water quality.

The regulation uses four (4) tiers of antidegradation protection. Tier 1 protects water quality for beneficial uses of the water on a parameter-by-parameter basis. Tier 2 protects high-quality waters where data show the water quality is better than levels needed to protect beneficial uses (on a parameter-by-parameter basis). Tier 2.5 and Tier 3 protect water quality and the special characteristics of waterbodies designated with the beneficial uses of "extraordinary, ecological, aesthetic or recreation 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
See Special Approvals/Conditions Table below.

SA – Special Approvals / Conditions Table

Item #	Description
1	Permittee shall report all events of Activated Carbon Medium replacements for the Carbon Canisters. All such quantities shall be reported in the units of lb/event and attached through the NetDMR system.

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

Corrective Action Sites
This site is a BCA remediation site with an active solvent plume (H-000748) undergoing treatment. In addition, there are ten (10) other BCA sites (8-000272, 8-000652, 8-000583, 8-001122, 8-001149, 8-001419, 8-001512, H-000243, H-000557, H-001029, and H-001337, each with leaking underground storage tanks that are being remediated) 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 these ongoing remediation sites.

Groundwater contaminant plume (H-000748) is a residual solvent plume located under the former PJ's Cleaners property, composed of PCE, TCE and TPH. Continued monitoring shall be required during the upcoming permit cycle. The water is currently being treated by an ISCR system (as explained under the Facility Description section) but is permitted under Permit NV0024227 for a GAC system for which the permit shall be issued.

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.	6/1/2026

Deliverable Schedule:

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

Item #	Description	Interval	First Scheduled Due Date
1	QUARTERLY DISCHARGE MONITORING 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.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: **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?
Total Dissolved Solids	mg/L	35	8,728.24	1900	RMHQ	**Yes**