FACTSHEET
(pursuant to NAC 445A.236)

Permittee Name: LAS VEGAS CONVENTION AND VISITORS AUTHORITY

3150 PARADISE ROAD
LAS VEGAS, NV 89109

Permit Number: NV0024232

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

Designation: MINOR NPDES

New/Existing: EXISTING

Location: LAS VEGAS CONVENTION AND VISITORS AUTHORITY REMEDIATION SYSTEM, CLARK
3150 PARADISE ROAD, LAS VEGAS, NV 89109
LATITUDE: 36.132090, LONGITUDE: -115.152272

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Latitude	Longitude	Receiving Water
IN1	GOLD LOT REMEDIATION SYSTEM INTAKE	Internal Outfall		36.132386	-115.155140	LAS VEGAS WASH VIA FLAMINGO WASH VIA STORM SEWER
IN2	NORTH ROAD REMEDIATION SYSTEM INTAKE	Internal Outfall		36.130085	-115.147669	LAS VEGAS WASH VIA FLAMINGO WASH VIA STORM SEWER
RS1	GOLD LOT REMEDIATION SYSTEM	External Outfall		36.132386	-115.155140	LAS VEGAS WASH VIA FLAMINGO WASH VIA STORM SEWER
RS2	NORTH ROAD REMEDIATION SYSTEM	External Outfall		36.130085	-115.147669	LAS VEGAS WASH VIA FLAMINGO WASH VIA STORM SEWER
SUM	SUM OF GOLD LOT REMEDIATION SYSTEM & NORTH ROAD REMEDIATION SYSTEM	External Outfall		36.130085	-115.147669	LAS VEGAS WASH VIA FLAMINGO WASH VIA STORM SEWER

Permit History/Description of Proposed Action
The Permittee, Las Vegas Convention and Visitors Authority (LVCVA), has applied for the renewal of their National Pollutant Discharge Elimination System (NPDES) Permit NV0024232, for the former City Laundry and Cleaners, now being the Las Vegas Convention Center, located at 3150 Paradise Road, 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 via two outfalls located onsite - the Gold Lot and the North Road.

This permit was first issued on May 1, 2020, and expired on April 30, 2025; the permit has been administratively continued since.

Facility Overview
The historical operations at the former Hudson Cleaners were identified as a Recognized Environmental

Condition (REC), during a Phase I Environmental Site Assessment, conducted in May 2007. Subsequent subsurface investigations conducted by others in 2007 and 2008 identified tetrachloroethylene (PCE) concentrations, in the temporary monitoring wells, exceeding the regulatory maximum contaminant level (MCL) of 5 ug/L. The discovered solvent plume (Bureau of Corrective Actions (BCA) Case No. H-000708) was determined to be commingling with an off-site, downgradient chlorinated solvent plume already being remediated (BCA Case No. 8-000841).

The site is composed of two areas, each having a separate granular activated carbon (GAC) water filtration treatment system, called the Gold Lot and the North Road site. Two separate effluent outfalls are required due to the expanse of the groundwater plume and physical obstructions (Paradise Road convention buildings). The systems are composed of multiple vapor extraction/air sparge (VE/AS) wells, drilled to various depths, to allow for focused vapor extraction and/or air sparging. In mid-2017, one deep groundwater monitoring well was drilled to define the maximum vertical extent of the PCE in the groundwater at the site with the aid of the monitoring wells already in place. The water is pumped to either the Gold Lot Remediation System Intake (Outfall IN1) or North Road Remediation System Intake (Outfall IN2).

The Gold Lot is currently developed with a visitor's access center and Skyway across Paradise Road connecting to the North Hall of the Las Vegas Convention Center (LVCC). For the Gold Lot remediation system, the remedial technologies installed consist of a groundwater pump and treat system with targeted soil vapor extraction around the former presumed source area. In total, ten remediation wells (four well containing soil vapor extraction and groundwater pump and treat) were installed to the east of the new Convention Center Expansion project, which extends from west of the SpringHill Suites site to the south at the former source area for the Gold Lot system. The pump and treat nuisance groundwater is treated via a 2-tank liquid phase carbon vessel system housed in a remediation compound. Within the remediation compound, the piping rises above ground and discharges into a plastic 850-gallon influent surge 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 1,050-pound aqueous carbon vessels loaded with GAC connected in series. From the aqueous GAC vessels, the treated groundwater effluent stream is pumped through a flow totalizer, and subsurface conveyance piping and is discharged to a public storm sewer system at the crossroads of Paradise Road and Convention Center Drive. This storm sewer conveys the discharge from this facility to the Las Vegas Wash.

Paradise Road consists of six individual parcels (a/k/a LVCVA Parcels) called "North Road" and is developed with the exhibit halls, offices and support facilities for LVCC's main complex. The area being remediated by the recovery wells is along North Road and south through the access roads around the Northeast section of the main LVCC complex. For the North Road remediation system, the remedial technology installed consists of a groundwater pump and treat system. In total, twelve remediation wells have been installed across the available area of North Road and parking lot areas to the north and northeast of the North Hall. The pump and treat nuisance groundwater is treated via a 2-tank liquid phase carbon vessel system housed in a remediation compound. Within the remediation compound, the piping rises above ground and discharges into a plastic 850-gallon influent surge 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 2,200-pound aqueous carbon vessels loaded with GAC connected in series. From the aqueous GAC vessels, the treated groundwater effluent stream is pumped through a flow totalizer, and subsurface conveyance piping and is discharged to a private storm sewer system on Desert Inn Road. This private system connects with a public system east of the convention center and discharges to the Las Vegas Wash.

In 2018, the LVCVA purchased the property and continued groundwater monitoring and corrective actions at the site. During May 2019, construction progressed on the LVCC expansion (new West Hall) to the point where the site was being prepared for grading activities. To prepare, site monitoring wells were capped, surveyed, and cut down below the proposed grading limit and buried. The remediation system piping was removed along with all remaining remediation equipment and moved to off-site storage for replacement following the completion of the LVCC expansion project. The remediation system was re-installed at its new

location in 2021. Three new remediation wells were installed at the west end of the new West Hall. Additional remediation wells were drilled within the anticipated path of the residual PCE plume, as assumed from prior groundwater monitoring events.

The current contractor assumed operation of the remediation system at the end of August 2021, and following required repairs and modifications, the system restarted on November 3, 2021. The former Hudson Cleaners system has been operating since that time except when operations were interrupted by The Boring Company during their construction of the LVCC Loop, a subsurface electric vehicular transport tunnel running westward beneath the new West hall to the LVCC Loop West Station and through the former Hudson Cleaners well network to intersect with the Resorts World Corridor Loop.

To address residual source mass located downgradient of the former dry cleaner, the current contractor is proposing to conduct a limited in-situ chemical reduction (ISCR) treatment, along with enhanced reductive dechlorination (ERD), to maximize both bioremediation and abiotic destruction to address the residual volatile organic compounds (VOCs) contamination remaining at the former Hudson Cleaners site. This "in place" treatment is often used to prevent contaminant plumes from migrating offsite 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 BCA, to maintain the permit until the active remediation case is closed.

The LVCVA’s Operation and Maintenance (O&M) Manual was last reviewed and approved on January 15, 2021. 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 on January 15, 2031. Note: The acceptance letter had an incorrect due date of January 14, 2030, for the next submittal. The date shall be updated during this permit cycle (for additional information see the Schedule of Compliance Table under the Permit).

Outfall Summary
Outfall IN1 - This internal monitoring point is for the measuring and monitoring of incoming influent into the Gold Lot Remediation System.

Outfall IN2 - This internal monitoring point is for the measuring and monitoring of incoming influent into the North Road Remediation System.

Outfall RS1 – This external outfall, the Gold Lot Remediation System, is for the discharge of treated, intercepted groundwater to a storm drain drop inlet located at Paradise Road and Convention Center Drive.

Outfall RS2 – This external outfall, North Road Remediation System, is for the discharge of treated, intercepted groundwater to a storm drain drop inlet located at Desert Inn Road.

Outfall SUM - This SUM outfall is for the total of Outfalls RS1 and RS2.

Effluent Characterization
Nevada State Network Discharge Monitoring Report (NetDMR) data, as reported from the years October 2020 to September 2025, was reviewed as part of this permit renewal process.

Under Outfall RS1, Gold Lot, the reported long-term average discharge flow rate was 97,038 gallons per day (Gal/d).

Under Outfall RS2, North Road, the reported long-term average discharge flow was 92,090 Gal/d during the period reviewed.

Listed below are those permitted parameters that had levels of concentration being above non-detection. These numbers were averaged over the period referenced above:

Notes:
mg/L = Milligrams per Liter
Gal/d = Gallons per Day
ug/L = Micrograms per Liter
S.U.= Standard Units
N = Nitrogen
TIN = Total Inorganic Nitrogen
TDS = Total Dissolved Solids

Outfall IN1 Gold Lot, Influent:
Boron, total: 465 ug/L
Flow Rate: 128,985 Gal/d
TIN: 6.77 mg/L
Nitrate as N: 6.41 mg/L
Nitrite as N: Non-detect
pH: 7.23 S.U.
TDS: 2,339 mg/L
Tetrachloroethylene: 23.23 ug/L
Trichloroethylene: 2.5 ug/L (1 instances, the rest were non-detect)
Trihalomethane: 6.10 ug/L (4 instances, the rest were non-detect)

Outfall IN2 North Road, Influent:
Boron, total: 538 ug/L
Flow Rate: 129,947 Gal/d
TIN: 8.91 mg/L
Nitrate as N: 8.16 mg/L
Nitrite as N: Non-detect
pH: 7.29 S.U.
TDS: 2,478 mg/L
Tetrachloroethylene: 14.83 ug/L
Trichloroethylene: 1.7 ug/L (3 instances, the rest were non-detect)
Trihalomethane: 5.72 ug/L (4 instances, the rest were non-detect)

Outfall RS1 Gold Lot, Treated Groundwater:
Ammonia as N: 1.48 mg/L
Boron: 564 ug/L
Bromodichloromethane: 0.31 ug/L (one instance reported, remainder were non-detect)
Chloroform: 7.29 ug/L
Chromium, total: 4.37 ug/L
Copper: 18.50 ug/L
Nickel: 4 ug/L (one instance reported, remainder were non-detect)
Nitrate: 8.03 mg/L
Nitrite: 0.074 mg/L (one instance reported, remainder were non-detect)
TIN: 8.61 mg/L
Phosphorus: 0.02 mg/L
Selenium: 11.40 ug/L
Silver: 1.3 ug/L (one instance reported, remainder were non-detect)
Tetrachloroethylene: 1.41 ug/L
Thallium: 36.50 ug/L
Trichloroethylene: Non-detected
Trihalomethane: 6.77 ug/L
TDS: 2,452 mg/L
Zinc: 7.2 ug/L

Outfall RS2 North Road, Treated Groundwater:
Ammonia as N: 1.24 mg/L

Boron: 686 ug/L
Bromodichloromethane: 0.27 ug/L (one instance reported, remainder were non-detect)
Chloroform: 5.36 ug/L
Chromium, total: 4.1 ug/L
Copper: 24 ug/L
Mercury: 0.145 ug/L
Nitrate as N: 6.34 mg/L
Nitrite as N: 2.50 (three instances reported, remainder were non-detect)
TIN: 6.95 mg/L
Phosphorus: 0.16 mg/L
Selenium: 9.34 ug/L
Silver: 0.93 ug/L
Tetrachloroethylene: 1.75 ug/L
Thallium: 19.50 ug/L
Trichloroethylene: Non-detect
Trihalomethane: 3.30 ug/L
TDS: 2,334 mg/L
Zinc: 2.2 ug/L (one instance reported, remainder were non-detect)

Unless listed above, for both outfalls (Gold Lot and North Road) the VOCs, Total Recoverable Metals, Base Neutral Compounds, and other pollutants reported both monthly and annually during the same period were below detectable levels.

Pollutants of Concern
Pollutants of concern are any pollutant, or parameters, that are believed to be present in the discharge and could affect or alter the physical, chemical, or biological conditions of the receiving water. Pollutants of concern are Ammonia (as N), Boron, Copper, Iron, Phosphorus, Selenium, TDS, TIN, Tetrachloroethylene, Trichloroethylene, Trichlorofluoromethane, and Trihalomethanes.

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 above the Treatment Plants.

Applicable Water Quality Standards/Beneficial Uses
The water quality standards (WQSs) for the nearest downstream control point, “Las Vegas Wash at the Historic Lateral” Nevada Administrative Code (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 facility was in compliance during the reporting period spanning from October 2020 to September 2025, with the exception of some exceedances of Boron and TDS.

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

Discharge Limitations Table for Sample Location In1 (Internal Outfall- Gold Lot Remediation System Intake) 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	IN1	Continuous	METER
Flow rate	Daily Maximum	M&R Gallons per Day (gal/d)		Internal Monitoring Point	IN1	Continuous	METER

Discharge Limitations Table for Sample Location In1 (Internal Outfall - Gold Lot Remediation System Intake) 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		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	IN1	Quarterly	DISCRT
Nitrogen, inorganic total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	IN1	Quarterly	DISCRT
Nitrogen, nitrate total (as N)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	IN1	Quarterly	DISCRT
Nitrogen, nitrite total (as N)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	IN1	Quarterly	DISCRT
pH, maximum	Daily Maximum		M&R Standard Units (SU)	Internal Monitoring Point	IN1	Quarterly	DISCRT
pH, minimum	Daily Minimum		M&R Standard Units (SU)	Internal Monitoring Point	IN1	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	IN1	Quarterly	DISCRT
Tetrachloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	IN1	Quarterly	DISCRT
Trichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	IN1	Quarterly	DISCRT
Trihalomethane, tot.	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	IN1	Quarterly	DISCRT
Trichlorofluoromethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	IN1	Quarterly	DISCRT

Discharge Limitations Table for Sample Location In2 (Internal Outfall - North Road Remediation System Intake) 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	IN2	Continuous	METER
Flow rate	Daily Maximum	M&R Gallons per Day (gal/d)		Internal Monitoring Point	IN2	Continuous	METER

Discharge Limitations Table for Sample Location In2 (Internal Outfall - North Road Remediation System Intake) 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		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	IN2	Quarterly	DISCRT
Nitrogen, inorganic total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	IN2	Quarterly	DISCRT
Nitrogen, nitrate total (as N)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	IN2	Quarterly	DISCRT
Nitrogen, nitrite total (as N)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	IN2	Quarterly	DISCRT
pH, maximum	Daily Maximum		M&R Standard Units (SU)	Internal Monitoring Point	IN2	Quarterly	DISCRT
pH, minimum	Daily Minimum		M&R Standard Units (SU)	Internal Monitoring Point	IN2	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	IN2	Quarterly	DISCRT
Tetrachloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	IN2	Quarterly	DISCRT
Trichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	IN2	Quarterly	DISCRT
Trihalomethane, tot.	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	IN2	Quarterly	DISCRT
Trichlorofluoromethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Internal Monitoring Point	IN2	Quarterly	DISCRT

Discharge Limitations Table for Sample Location Rs1 (External Outfall - Gold Lot Remediation System Discharge) 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	RS1	Continuous	METER
Flow rate	Daily Maximum	M&R Gallons per Day (gal/d)		Effluent Gross	RS1	Continuous	METER

Discharge Limitations Table for Sample Location Rs1 (External Outfall - Gold Lot Remediation System Discharge) 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	RS1	Quarterly	DISCRT
Copper, dissolved (as Cu)	Daily Maximum		<= 29 Micrograms per Liter (ug/L)	Effluent Gross	RS1	Quarterly	DISCRT
Iron, total recoverable	Daily Maximum		<= 1000 Micrograms per Liter (ug/L)	Effluent Gross	RS1	Quarterly	DISCRT
Nitrogen, ammonia total (as N)	Daily Maximum	M&R Pounds per Day (lb/d)[1]	M&R Milligrams per Liter (mg/L)	Effluent Gross	RS1	Quarterly	CALCTD
Nitrogen, inorganic total	Daily Maximum		<= 20 Milligrams per Liter (mg/L)	Effluent Gross	RS1	Quarterly	DISCRT
Nitrogen, nitrate total (as N)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	RS1	Quarterly	DISCRT
Nitrogen, nitrite total (as N)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	RS1	Quarterly	DISCRT
pH, minimum	Daily Minimum		>= 6.5 Standard Units (SU)	Effluent Gross	RS1	Quarterly	DISCRT
pH, maximum	Daily Maximum		<= 9.0 Standard Units (SU)	Effluent Gross	RS1	Quarterly	DISCRT
Phosphorus, total (as P)	Daily Maximum	M&R Pounds per Day (lb/d)[1]	M&R Milligrams per Liter (mg/L)	Effluent Gross	RS1	Quarterly	CALCTD
Selenium, dissolved [as Se]	Daily Maximum		<= 6.3 Micrograms per Liter (ug/L)	Effluent Gross	RS1	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		<= 3000 Milligrams per Liter	Effluent Gross	RS1	Quarterly	DISCRT

Discharge Limitations Table for Sample Location Rs1 (External Outfall - Gold Lot Remediation System Discharge) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
			(mg/L)				
Tetrachloroethylene	Daily Maximum		<= 5.0 Micrograms per Liter (ug/L)	Effluent Gross	RS1	Quarterly	DISCRT
Trichloroethylene	Daily Maximum		<= 5.0 Micrograms per Liter (ug/L)	Effluent Gross	RS1	Quarterly	DISCRT
Trihalomethane, tot.	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Quarterly	DISCRT
Trichlorofluoromethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Quarterly	DISCRT

Notes (Discharge Limitations Table):

1. Loading (lbs/day) = Flow (MGD) x Concentration (mg/L) x 8.34

Discharge Limitations Table for Sample Location Rs1 (External Outfall - Gold Lot Remediation System Discharge) 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, dissolved (as As)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Beryllium, total recoverable (as Be)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Cadmium, dissolved (as Cd)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Chromium, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Chromium, Hexavalent [As CR] (Chromium (VI))[1]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Chromium, Trivalent [As CR] (Chromium (III))[1]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Cyanide, total (as CN)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Fluoride, total (as F)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Lead, dissolved (as Pb)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Manganese, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Mercury, dissolved (as Hg)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location Rs1 (External Outfall - Gold Lot Remediation System Discharge) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Molybdenum, total recoverable	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Nickel, total (as Ni)[1]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Silver, dissolved (as Ag)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Sulfide, total (as S)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Zinc, dissolved (as Zn)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Acrolein	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Aldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
.alpha.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
.beta.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Chlordane (tech mix. and metabolites)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Chlorpyrifos	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location Rs1 (External Outfall - Gold Lot Remediation System Discharge) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
4,4-DDT	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Demeton	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Diazinon	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Dieldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Endrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Azinphos-Methyl (Guthion)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Heptachlor	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Heptachlor epoxide	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Lindane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Malathion	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Methoxychlor	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location Rs1 (External Outfall - Gold Lot Remediation System Discharge) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Mirex	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Nonylphenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Parathion	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Pentachlorophenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Polychlorinated biphenyls (PCBs)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Toxaphene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Tributyltin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
1,1-Dichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
1,2-Dichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
trans-1,2-Dichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT
Vinyl Chloride (Chloroethylene (Vinyl))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS1	Once Per Permit Term	DISCRT

Notes (Discharge Limitations Table):

1. Analysis to be done to the dissolved fraction.

Discharge Limitations Table for Sample Location Rs2 (External Outfall - North Road Remediation System Discharge) 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	RS2	Continuous	METER
Flow rate	Daily Maximum	M&R Gallons per Day (gal/d)		Effluent Gross	RS2	Continuous	METER

Discharge Limitations Table for Sample Location Rs2 (External Outfall - North Road Remediation System Discharge) 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	RS2	Quarterly	DISCRT
Copper, dissolved (as Cu)	Daily Maximum		<= 29 Micrograms per Liter (ug/L)	Effluent Gross	RS2	Quarterly	DISCRT
Iron, total recoverable	Daily Maximum		<= 1000 Micrograms per Liter (ug/L)	Effluent Gross	RS2	Quarterly	DISCRT
Nitrogen, ammonia total (as N)	Daily Maximum	M&R Pounds per Day (lb/d)[1]	M&R Milligrams per Liter (mg/L)	Effluent Gross	RS2	Quarterly	DISCRT
Nitrogen, inorganic total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	RS2	Quarterly	DISCRT
Nitrogen, nitrate total (as N)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	RS2	Quarterly	DISCRT
Nitrogen, nitrite total (as N)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	RS2	Quarterly	DISCRT
pH, maximum	Daily Maximum		<= 9.0 Standard Units (SU)	Effluent Gross	RS2	Quarterly	DISCRT
pH, minimum	Daily Minimum		>= 6.5 Standard Units (SU)	Effluent Gross	RS2	Quarterly	DISCRT
Phosphorus, total (as P)	Daily Maximum	M&R Pounds per Day (lb/d)[1]	M&R Milligrams per Liter (mg/L)	Effluent Gross	RS2	Quarterly	DISCRT
Selenium, dissolved [as Se]	Daily Maximum		<= 6.3 Micrograms per Liter (ug/L)	Effluent Gross	RS2	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		<= 3000 Milligrams per Liter	Effluent Gross	RS2	Quarterly	DISCRT

Discharge Limitations Table for Sample Location Rs2 (External Outfall - North Road Remediation System Discharge) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
			(mg/L)				
Tetrachloroethylene	Daily Maximum		<= 5.0 Micrograms per Liter (ug/L)	Effluent Gross	RS2	Quarterly	DISCRT
Trichloroethylene	Daily Maximum		<= 5.0 Micrograms per Liter (ug/L)	Effluent Gross	RS2	Quarterly	DISCRT
Trihalomethane, tot.	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Quarterly	DISCRT
Trichlorofluoromethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Quarterly	DISCRT

Notes (Discharge Limitations Table):

1. Loading (lbs/day) = Flow (MGD) x Concentration (mg/L) x 8.34

Discharge Limitations Table for Sample Location Rs2 (External Outfall - North Road Remediation System Discharge) 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, dissolved (as As)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Beryllium, total recoverable (as Be)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Cadmium, dissolved (as Cd)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Chromium, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Chromium, Hexavalent [As CR] (Chromium (VI))[1]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Chromium, Trivalent [As CR] (Chromium (III))[1]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Cyanide, total (as CN)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Fluoride, total (as F)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Lead, dissolved (as Pb)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Manganese, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Mercury, dissolved (as Hg)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location Rs2 (External Outfall - North Road Remediation System Discharge) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Molybdenum, total recoverable	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Nickel, total (as Ni)[1]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Silver, dissolved (as Ag)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Sulfide, total (as S)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Zinc, dissolved (as Zn)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Acrolein	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Aldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
.alpha.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
.beta.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Chlordane (tech mix. and metabolites)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Chlorpyrifos	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location Rs2 (External Outfall - North Road Remediation System Discharge) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
4,4-DDT	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Demeton	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Diazinon	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Dieldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Endrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Azinphos-Methyl (Guthion)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Heptachlor	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Heptachlor epoxide	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Lindane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Malathion	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Methoxychlor	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
			M&R				

Discharge Limitations Table for Sample Location Rs2 (External Outfall - North Road Remediation System Discharge) To Be Reported Once During The Permit Term

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Mirex	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Nonylphenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Parathion	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Pentachlorophenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Polychlorinated biphenyls (PCBs)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Toxaphene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Tributyltin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
1,1-Dichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
1,2-Dichloroethane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
trans-1,2-Dichloroethylene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT
Vinyl Chloride (Chloroethylene (Vinyl))	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	RS2	Once Per Permit Term	DISCRT

Notes (Discharge Limitations Table):

1. Analysis to be done to the dissolved fraction.

Discharge Limitations Table for Sample Location Sum (Sum Of Gold Lot Remediation System & North Road Remediation System) To Be Reported Monthly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Flow rate	Daily Maximum	< 500000 Gallons per Day (gal/d)		Effluent Gross	SUM	Continuous	CALCTD
Flow rate	30 Day Average	M&R Gallons per Day (gal/d)		Effluent Gross	SUM	Continuous	CALCTD

Summary of Changes From Previous Permit

CHANGED – Under all the outfalls, the sample types were changed from “Compos” to “Discrete”These changes were done based on both Divisional sampling standards for this type of nuisance water discharge permit, along with “Compos” sampling involving taking multiple discrete samples (done at different times or locations). Each outfall has only one location, and based on non-detect results, multiple sampling times are not needed.

Under Outfall IN1 a “To Be Reported Monthly” Discharge Limitation Table was added along 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 “IN1” Sample Location, a “Continuous” Measurement Frequency, and “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 “IN1” Sample Location, a “Continuous” Measurement Frequency, and “Meter” Sample Type.

Under Outfall IN2 a “To Be Reported Monthly” Discharge Limitation Table was added along 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 “IN2” Sample Location, a “Continuous” Measurement Frequency, and “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 “IN2” Sample Location, a “Continuous” Measurement Frequency, and “Meter” Sample Type.

Under Outfall IN1 To Be Reported Quarterly Discharge Limitation Table the following parameters were deleted:

DELETED - Flow Rate, with a “30-Day Average” Base, a “M&R Million Gallons per Day (Mgal/d)” Quantity, an “Effluent Gross” Monitoring Location, a “IN1” Sample Location, a “Continuous” Measurement Frequency, and “Meter” Sample Type.

DELETED - Flow Rate, with a “Daily Maximum” Base, a “M&R Million Gallons per Day (Mgal/d)” Quantity, an “Effluent Gross” Monitoring Location, a “IN1” Sample Location, a “Continuous” Measurement Frequency, and “Meter” Sample Type.

CHANGED - The remaining parameters, Boron, Ammonia (as N), Nitrate (as N), Nitrite (as N), pH (minimum

and maximum), TDS, Tetrachloroethylene, TIN, Trichloroethylene, and Trihalomethane, were updated from a “Effluent Gross” Monitoring Location to a “Internal Monitoring Location”.

ADDED - Trichlorofluoromethane, with a "Daily Maximum" Base, a "Internal Monitoring Point" Monitoring Location, a "IN1" Monitoring Point, a "Quarterly" Measurement Frequency, and a "Discrt" Sample Type.

Under Outfall IN2 To Be Reported Quarterly Discharge Limitation Table the following parameters were deleted:

DELETED - Flow Rate, with a “30-Day Average” Base, a “M&R Million Gallons per Day (Mgal/d)” Quantity, an “Effluent Gross” Monitoring Location, a “IN2” Sample Location, a “Continuous” Measurement Frequency, and “Meter” Sample Type.

DELETED - Flow Rate, with a “Daily Maximum” Base, a “M&R Million Gallons per Day (Mgal/d)” Quantity, an “Effluent Gross” Monitoring Location, a “IN2” Sample Location, a “Continuous” Measurement Frequency, and “Meter” Sample Type.

CHANGED - The remaining parameters, Boron, Ammonia (as N), Nitrate (as N), Nitrite (as N), pH (minimum and maximum), TDS, Tetrachloroethylene, TIN, Trichloroethylene, and Trihalomethane, were updated from a “Effluent Gross” Monitoring Location to a “Internal Monitoring Location”.

Outfall RS1 Discharge Limitation Table was changed from a “To Be Reported Monthly” to a “To Be Reported Quarterly” period along with the following parameters being either deleted, changed, or added:

ADDED – Copper, dissolved, with a “Daily Maximum” Base, a “<=29 Micrograms per Liter (ug/L)” Concentration, a “Effluent Gross” Monitoring Location, a “RS1” 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, a “Effluent Gross” Monitoring Location, a “RS1” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Selenium, dissolved, with a “Daily Maximum” Base, a “<=6.3 Micrograms per Liter (ug/L)” Concentration, a “Effluent Gross” Monitoring Location, a “RS1” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED - Trichlorofluoromethane, with a "Daily Maximum" Base, an "M&R Micrograms per Liter (ug/L)" Concentration, an "Effluent Gross" Monitoring Location, an “RS1” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

ADDED – An additional discharge limitation for both Nitrogen, ammonia total (as N) and Phosphorus, total (as P) being “M&R Milligrams per Liter (mg/L)” Concentration along with maintaining the “M&R Pounds per Day (lb/d)” quantity.

Along with footnote:

1. Loading (lbs/day) = Flow (MGD) x Concentration (mg/L) x 8.34.

Outfall RS2 Discharge Limitation Table was changed from a “To Be Reported Monthly” to a “To Be Reported Quarterly” period along with the following parameters being either deleted, changed, or added:

ADDED – Copper, dissolved, with a “Daily Maximum” Base, a “<=29 Micrograms per Liter (ug/L)” Concentration, a “Effluent Gross” Monitoring Location, a “RS2” 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, a “Effluent Gross” Monitoring Location, a “RS2” Sample Location, a “Quarterly”

Measurement Frequency, and a “Discrt” Sample Type.

ADDED – Selenium, dissolved, with a “Daily Maximum” Base, a “<=6.3 Micrograms per Liter (ug/L)” Concentration, a “Effluent Gross” Monitoring Location, a “RS2” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type. All remaining limitations remained unchanged.

ADDED – An additional discharge limitation for both Nitrogen, ammonia total (as N) and Phosphorus, total (as P) being “M&R Milligrams per Liter (mg/L)” Concentration along with maintaining the “M&R Pounds per Day (lb/d)” quantity. All remaining monitoring limitations remained unchanged.

ADDED - Trichlorofluoromethane, with a "Daily Maximum" Base, an "M&R Micrograms per Liter (ug/L)" Concentration, an "Effluent Gross" Monitoring Location, an “RS2” Sample Location, a “Quarterly” Measurement Frequency, and a “Discrt” Sample Type.

Along with footnote:

1. Loading (lbs/day) = Flow (MGD) x Concentration (mg/L) x 8.34.

Outfall RS1 Discharge Limitation Table was changed from a “To Be Reported Annually” to a “To Be Reported Once During the Permit Term” period along with the following parameters being either added or deleted:

DELETED - Priority Pollutants that were not on the Toxic Materials listing as defined under NAC 445.1236, this was based on those parameters being non-detect during the past five years.

DELETED - Fecal Coliform, with a "Daily Maximum" Base.

DELETED - E. Coli, with a "Daily Maximum" Base.

DELETED – Copper, total recoverable, with a “Daily Maximum” Base.

DELETED – Selenium, total recoverable, with a “Daily Maximum” Base.

ADDED – Chromium, Hexavalent [as CR] (Chromium (VI)), with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Effluent Gross, Monitoring Location, a “RS1” Sample Location, and a “Discrt” Sample Type.

ADDED - Chromium, Trivalent [as CR] (Chromium (III)), with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Effluent Gross, Monitoring Location, a “RS1” Sample Location, and a “Discrt” Sample Type.

ADDED – Fluoride, total (as F), with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “RS1” Sample Location, a “Once Per Permit Term” Measurement Frequency, and “a “Discrt" Sample Type.

ADDED – Manganese, total recoverable, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “RS1” Sample Location, a “Once Per Permit Term” Measurement Frequency, and “a “Discrt" Sample Type.

ADDED – Molybdenum, total recoverable, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “RS1” Sample Location, a “Once Per Permit Term” Measurement Frequency, and “a “Discrt" Sample Type.

ADDED - Trichlorofluoromethane, with a "Daily Maximum" Base, a "Internal Monitoring Point" Monitoring Location, a "RS1" Monitoring Point, a "Once per Permit Term" Measurement Frequency, and a "Discrt" Sample Type.

ADDED - Footnote 1.

1. Analysis to be done to the dissolved fraction.

Outfall RS2 Discharge Limitation Table was changed from a “To Be Reported Annually” to a “To Be Reported Once During the Permit Term” period along with the following parameters being either added or deleted:

DELETED - Priority Pollutants that were not on the Toxic Materials listing as defined under NAC 445.1236, this was based on those parameters being non-detect during the past five years.

DELETED – Copper, total recoverable, with a “Daily Maximum” Base.

DELETED - Fecal Coliform, with a "Daily Maximum" Base.

DELETED - E. Coli, with a "Daily Maximum" Base.

DELETED – Selenium, total recoverable, with a “Daily Maximum” Base.

ADDED – Chromium, Hexavalent [as CR] (Chromium (VI)), with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Effluent Gross, Monitoring Location, a “RS2” Sample Location, and a “Discrt” Sample Type.

ADDED - Chromium, Trivalent [as CR] (Chromium (III)), with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, a “Effluent Gross, Monitoring Location, a “RS2” Sample Location, and a “Discrt” Sample Type.

ADDED – Fluoride, total (as F), with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “RS2” Sample Location, a “Once Per Permit Term” Measurement Frequency, and “a “Discrt" Sample Type.

ADDED – Manganese, total recoverable, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “RS2” Sample Location, a “Once Per Permit Term” Measurement Frequency, and “a “Discrt" Sample Type.

ADDED – Molybdenum, total recoverable, with a “Daily Maximum” Base, a “M&R Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “RS2” Sample Location, a “Once Per Permit Term” Measurement Frequency, and “a “Discrt" Sample Type.

ADDED - Trichlorofluoromethane, with a "Daily Maximum" Base, a "Internal Monitoring Point" Monitoring Location, a "RS2" Monitoring Point, a "Once per Permit Term" Measurement Frequency, and a "Discrt" Sample Type.

ADDED - Footnote 1.

1. Analysis to be done to the dissolved fraction.

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). 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.

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 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 use which is not applicable to the section of the Las Vegas Wash receiving the discharge. The toxic materials shall be sampled for once a permit term. If, during the next renewal review process, the water quality data shows a reasonable potential (via a Reasonable Potential Analysis) for any constituent, the Division will retain that constituent with a limit and may increase the sampling frequency for that constituent during the next permit renewal cycle.

The receiving water body, the Las Vegas Wash, has an Requirement to Maintain Existing Higher Quality (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 October 2020 to September 2025, the effluent TDS ranged from 2,300 mg/L to 3,300 mg/L for Outfall RS1 (Gold Lot) and 2,200 mg/L to 2,600 mg/L for Outfall RS2 (North Road). 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 at Outfall RS1 Gold Lot has the potential to cause, or contribute to, an exceedance above the RMHQ, but not the 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 treated, 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. Where effluents are discharged to such waters, the discharges are not considered a contributor to substandard conditions provided maximum treatment in compliance with permit requirements is maintained." Therefore, the proposed permit establishes a limit of 3,000 mg/L for both Outfall RS1 and Outfall RS2 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.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 for Outfall RS1, Gold Lot, was based on data collected from October 2020 to September 2025 which includes effluent data submitted in DMRs and the Permittee's monitoring laboratory reports. Based on the RPA, the discharge exhibits reasonable potential to cause, or contribute to, instream excursions above the applicable water quality criteria for Boron, Copper, Selenium, TDS, and TIN.

The RPA for Outfall RS2, North Road, was based on data collected from October 2020 to September 2025 which includes effluent data submitted in DMRs and the Permittee's monitoring laboratory reports. Based on the RPA, the discharge exhibits reasonable potential to cause, or contribute to, instream excursions above the applicable water quality criteria for Boron, Copper, Phosphorus, Selenium, and TDS.

Proposed Water Quality Based Effluent Limits (monthly/weekly/daily)
The proposed permit establishes a daily maximum limit of 29 ug/L for Copper, at both Outfalls RS1 and RS2, in accordance with the chronic criterion to protect the aquatic life beneficial use included in NAC 445A.1236 and based on findings from the RPA.

The proposed permit establishes a daily maximum limit of 6.3 ug/L for Selenium for both outfalls. Based on the RPA, both the discharges (Outfalls RS1 and RS2) exhibits reasonable potential to cause, or contribute to, instream excursions above the applicable water quality standard for Selenium. This Selenium limitation was established due to the impairment of Flamingo Wash by this pollutant of concern. The sampling frequency has been established on quarterly basis.

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 at both outfalls (RS1 and RS2).

The proposed permit retains 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 at both outfalls (RS1 and RS2).

The proposed permit establish a daily maximum limit of M&R (monitor & report) mg/L for nitrate (as N), as per NAC 445.2156, along with a quarterly reporting requirement.

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

The proposed permit establishes the daily maximum limit of M&R mg/L for TIN, per NAC 445.2156, along with a quarterly reporting requirement for Outfall RS1 and a M&R mg/L and quarterly reporting requirement for Outfall RS2.

The proposed permit retains the daily maximum limit of 5 ug/L for Trichloroethylene along with a quarterly reporting requirement.

The proposed permit retains the daily maximum limit of 5 ug/L for Tetrachloroethylene along with a quarterly reporting requirement.

The proposed permit retains the daily maximum limit of "monitor and report (M&R)" ug/L for Trihalomethane, along with a quarterly reporting requirement.

The proposed permit establishes a monitor and report daily maximum limit for organic chemicals based on the beneficial uses, associated with portions of the Las Vegas Wash above the Treatment Plants, as delineated under NAC 445A.1236 for a once a permit term reporting requirement.

Basis for Effluent Limitations
The proposed permit retains the requirement to sample for Trichloroethylene (TCE). TCE was used for local dry-cleaning applications but is now highly limited in United States. Due to the known active Bureau of Corrective Action (BCA) sites that had a release of TCE within a one-mile radius of the Las Vegas

Convention Center, and the applied remediation efforts ongoing, continued monitoring is required.

The permit retains the requirement to monitor and report VOCs, heavy metals, and organic compounds to satisfy antibacksliding requirements; however, as the VOCs were reported as non-detect during the past five years, sampling has been decreased from "Annually" to "Once During the Permit Term".

The proposed permit retains the requirement to sample for Tetrachloroethylene (PCE). PCE is a solvent often used for dry cleaning and as a degreaser. Due to the known active Bureau of Corrective Action (BCA) sites that had a release of PCE within a one-mile radius of the Las Vegas Convention Center, and the applied remediation efforts ongoing, continued monitoring is required.

The proposed permit establishes the requirement to sample for Trihalomethanes (THMs) on a quarterly basis, with a limit of M&R micrograms per liter (ug/L). Trihalomethanes (THMs) are disinfection byproducts formed when chlorine or bromine reacts with organic matter in water. The four primary THMs—chloroform, bromodichloromethane, dibromochloromethane, and bromoform—are regulated due to potential links to cancer, liver, and kidney damage. Long-term exposure is associated with bladder cancer and reproductive issues, with risks arising from drinking, inhaling, or dermal absorption. Due to the known active Bureau of Corrective Actions (BCA) sites that have previously had a release of THMs, within a one-mile radius of the site, and the applied remediation efforts ongoing, continued monitoring is required.

The proposed permit establishes the requirement to sample for Trichlorofluoromethane on a quarterly basis, with a limit of M&R micrograms per liter (ug/L). Trichlorofluoromethane also known as CFC-11 or Freon-11, is a colorless, volatile chlorofluorocarbon (CFC) historically used as a refrigerant, aerosol propellant, and foam-blowing agent. Due to its high ozone-depleting potential, its production was phased out globally and is no longer being used.

Anti-backsliding

Sections 402(o) and 303(d)(4) of the CWA and federal regulations of 40 CFR 122.44(i) prohibit backsliding and require effluent limitations in a reissued permit to be as stringent as those in the previous permit. Based on five years of non-detect values for VOCs, Total Recoverable Metals, Base Neutral Compounds, and other pollutants originally reported annually, the reporting period was changed to a "Once A Permit Term" period, with additional parameters added as further expanded under NAC 445A.1236.

Under all the outfalls, the sample types were changed from “Compos” to “Discrete”. These changes were done based on both Divisional sampling standards for this type of groundwater discharge permit, along with “Compos” sampling involving taking multiple discrete samples (done at different times or locations). Each outfall has only one location, and based on non-detect results, multiple sampling times are not needed.

VOCs, and other non-detected parameters, were removed, based on the following anti-backsliding exception (Section 402(o), Item 2) being new information that was not available at the time of permit issuance.

Based on the following anti-backsliding exception (Section 402(o), Item 2) being new information that was not available at the time of permit issuance, priority pollutants that had been reported as non-detectable during the past five years were removed.

Based on Section 402(o), Item 2, being new information that was not available at the time the of the permit issuance, the sampling of fecal coliform and *E. coli* was removed based on the discharge not being associated with treated wastewater.

Antidegradation

The Division has developed an antidegradation regulation that is applied on a statewide basis, and which meets the statutory requirements of Nevada’s water pollution control law found at Nevada Revised Statute (NRS) 445A.520 and NRS 565 and is consistent with the federal antidegradation policy found at Title 40 in the CFR section 131.12. The objective of the Division’s antidegradation regulation is to prevent

degradation of Nevada's surface water and maintain the unique attributes and special characteristics and water quality associated with high-quality waters. This objective is achieved through the implementation of procedures to ensure that water is protected from regulated activities that have the potential to degrade the water quality.

The regulation uses four (4) tiers of antidegradation protection. Tier 1 protects water quality for beneficial uses of the water on a parameter-by-parameter basis. Tier 2 protects high-quality waters where data show the water quality is better than levels needed to protect beneficial uses (on a parameter-by-parameter basis). Tier 2.5 and Tier 3 protect water quality and the special characteristics of waterbodies designated with the beneficial uses of "extraordinary, ecological, aesthetic or recreational value" (NAC 445A.122). The Division will conduct an antidegradation review only when a permit application is submitted for a new or expanding point source discharge to a surface water or for a new or altered zone of mixing.

Since the proposed renewal of this permit does not include a new, or expanding, point source discharge; or, a new or altered zone of mixing, an antidegradation review is not required.

Special Conditions
There are no Special Approvals / Conditions associated with this permit.

SA – Special Approvals / Conditions Table

There are no Special Approval / Condition items

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

Corrective Action Sites
There are five (5) active BCA sites located within a one-mile radius of the permitted facility. The discovered solvent plume (Case No. H-000708) was determined to be commingling with an off-site, downgradient chlorinated solvent plume already being remediated (Case No. 8-000841) with treatment systems being installed at the permitted site to treat the plumes, while the three (3) other active cases being for leaking underground storage tanks (8-000753 and 8-001471, gasoline and benzene, along H-000511, solvents). BCA doesn't not feel that the renewal of this permit will cause any issues with the active cleanup areas, especially if limits are applicable to the constituents of concern under this permit.

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 public water supply (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 to be done by a Nevada licensed Professional Engineer (P.E.), system specialist, or environmental manager with expertise with this type of treatment system.	1/15/2031

Deliverable Schedule:

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

Item #	Description	Interval	First Scheduled Due Date
1	Quarterly DMRs	Quarterly	7/28/2026
2	Annual DMRs	Annually	1/28/2027

Procedures for Public Comment:

The Notice of the Division's intent to issue a permit authorizing the facility to discharge to groundwater of the State of Nevada subject to the conditions contained within the permit, is being mailed to interested persons on our mailing list and will be posted on our website at https://ndep.nv.gov/posts. Anyone wishing to comment on the proposed permit can do so in writing until 5:00 P.M. **4/6/2026,** 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: **3/3/2026**
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	4	104.2	30	Chronic Aquatic Life	**Yes**
Selenium, Total Recoverable	ug/L	4	75.8	6.3	Chronic Aquatic Life	**Yes**
Silver, Total Recoverable	ug/L	4	6.2	41	Acute Aquatic Life	No
Zinc, Total Recoverable	ug/L	4	56.8	388	Acute Aquatic Life	No
Ammonia, Total (as N)	mg/L	47	4.81	0.342	Chronic Aquatic Life	**Yes**
Boron	ug/L	49	1,366.70	750	Irrigation	**Yes**
Nitrate, Total (as N)	mg/L	49	34.67	90	QC to Protect Beneficial Us	No
Nitrite, Total (as N)	mg/L	49	0.13	5	QC to Protect Beneficial Us	No
Nitrogen, total inorganic	mg/L	47	37.38	20	RMHQ	**Yes**
Total Dissolved Solids	mg/L	46	3,546.88	1900	RMHQ	**Yes**

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	138.3	30	Chronic Aquatic Life	**Yes**
Mercury, Total Recoverable	ug/L	6	0.6	1	Chronic Aquatic Life	No
Selenium, Total Recoverable	ug/L	7	46.1	6.3	Chronic Aquatic Life	**Yes**
Toxaphene	ug/L	6	0	0.0002	Chronic Aquatic Life	No
Ammonia, Total (as N)	mg/L	52	9.61	0.342	Chronic Aquatic Life	**Yes**
Boron	ug/L	54	3,016.88	750	Irrigation	**Yes**
Nitrate, Total (as N)	mg/L	49	11.45	90	QC to Protect Beneficial Us	No
Nitrite, Total (as N)	mg/L	49	4.49	5	QC to Protect Beneficial Us	No
Nitrogen, total inorganic	mg/L	50	16.75	20	RMHQ	No
Phosphorus, Total (as P)	mg/L	51	1.42	0	QC to Protect Beneficial Us	**Yes**
Total Dissolved Solids	mg/L	48	2,737.38	1900	RMHQ	**Yes**