



FACTSHEET
(pursuant to NAC 445A.236)

Permittee Name: CSS FARMS
4100 DUTCH FLAT RD
WINNEMUCCA, NV 89445

Permit Number: NS0089012

Permit Type: GROUNDWATER DISCHARGE

Designation: GROUNDWATER

New/Existing: EXISTING

Location: CSS FARMS, HUMBOLDT
ONE POTATO PLACE, WINNEMUCCA, NV 89445
LATITUDE: 40.95370220, LONGITUDE: -117.74450570
TOWNSHIP: 36N, RANGE: 38E, SECTION: 31N

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Latitude	Longitude	Receiving Water
MW1	MONITORING WELL MW-01	Monitoring Well		40.933264	-117.762293	GROUNDWATER
MW2	MONITORING WELL MW-02	Monitoring Well		40.934646	-117.768535	GROUNDWATER
MW3	MONITORING WELL MW-03	Monitoring Well		40.938018	-117.763466	GROUNDWATER
P01	POND 1	External Outfall		40.94097920	-117.755036	GROUNDWATER
P02	POND 2	External Outfall		40.93979590	-117.755422	GROUNDWATER
PFW	PRODUCTION WELL - FRESH WATER WELL	Intake Structure		40.940845	-117.754078	GROUNDWATER
PW1	PRODUCTION WELL #1	Intake Structure		40.950509	-117.748065	GROUNDWATER
PW2	PRODUCTION WELL #2	Intake Structure		40.949766	-117.747593	GROUNDWATER
SLA	SLUDGE - LAND APPLICATION	Land Application Site		40.938611	-117.760278	GROUNDWATER
SUM	EFFLUENT DISCHARGE TO FIELDS	External Outfall		40.93634330	-117.762245	GROUNDWATER
W1A	MONITORING WELL MW-01A	Monitoring Well		40.933339	-117.762091	GROUNDWATER
W4A	MONITORING WELL MW-04A	Monitoring Well		40.941381	-117.753847	GROUNDWATER
W5A	MONITORING WELL MW-05A	Monitoring Well		40.942446	-117.756221	GROUNDWATER

Permit History/Description of Proposed Action

The Permittee, CSS Farms (CSS), has applied for the renewal of groundwater discharge permit NS0089012 for its potato washing facility. The main processing facility is located within Humboldt County, immediately south of U.S. Interstate 80 at One Potato Place, Winnemucca, Nevada. The facility utilizes two (2) intake wells to wash potatoes after they are harvested from nearby farms, and is permitted to store all washwater in a double-lined storage pond (Pond 2, Outfall P02) prior to discharge for irrigation during the growing season. CSS may utilize Pond 1 (Outfall P01) for washwater storage after fulfilling special condition

included in this permit renewal. Potato washing occurs year-round except during periods of equipment maintenance. The Permittee seeks to continue discharging stored washwater for field irrigation during the growing season. The daily maximum discharge limit of 1.0 million gallons per day (Mgal/d) remains unchanged for this renewal.

The permit was first issued on November 22, 1994. The most recent permit was issued on October 1, 2018, and expired on September 30, 2023; the permit has been administratively continued since.

Facility Overview

In 2021, the facility underwent a change in management and is now operated by CSS Farms. Potatoes are harvested from farms located north of the city of Winnemucca and transported to the facility for washing. The facility contains 16 potato cellars, each capable of holding ten million pounds of potatoes. The potatoes are stored dry, and cool air is circulated through the cellars to maintain cool temperatures and moderate humidity to prevent spoilage. CSS currently processes an average of 300 to 600 tons of potatoes every day.

CSS pulls water from two (2) intake wells to supply the potato washing facility. Production Well #1 (Outfall PW1) historically contains higher nitrogen concentration (i.e., more than 10 milligrams per liter, mg/L), while Production Well #2 (Outfall PW2) historically contains nitrogen concentration that is less than 10 mg/L. The facility sprays antimicrobial solution at the end of the potato washing process for product sanitation and shelf-life extension. All washwaters drain into a holding tank located in the main process building and is pumped to a concrete-lined sedimentation pond, where silt and debris are allowed to settle. Settled material is removed by a backhoe and stored onsite for land application later. Washwater is subsequently conveyed through a series of pumps to the effluent storage reservoir (Pond 2, Outfall P02). Pond 2 is an 8.3-million-gallon double-lined reservoir (60-mil high density polyethylene, HDPE, primary liner and a 40-mil HDPE secondary liner), and it is sloped to a leak detection and collection sump. Pond cleanup and liner replacement were completed in September 2020. Sludge accumulated at the bottom of Pond 2 is permitted for on-site land application (Outfall SLA). Historically, the accumulated sludge is distributed on-site every few years. In addition, Pond 1 is a former BIOLAC treatment basin (~ 1.3 acres) and no longer in use. This pond is permitted for washwater storage pending fulfillment of special condition of this renewed permit.

No additional treatment is done to the effluent prior to discharge. Discharge for crop irrigation must occur during the growing season only, which is approximately from April to October. If necessary, CSS may supplement the water demand for irrigation from a freshwater well (Outfall PFW). Groundwater from this outfall may discharge into Pond 2 first or bypass it to irrigate the field directly. The total irrigable land at the facility is approximately 220 acres. Discharge is accomplished via piping to the pivots and distributing it uniformly over the field. Fecal coliform is not typically found in the discharge. However, in order to address concerns associated with unintended dispersion of water containing fecal coliform, CSS has: (1) installed drop tubes to lower sprinkler heads near ground level; (2) replaced sprinkler heads with low-pressure, anti-drift heads and nozzles; and (3) installed a pressure reducing valve to throttle pressure to 20 pounds per square inch (psi). The drop tubes are adjusted to the maximum length that will still clear the standing crop, and the anti-drift sprinkler heads and nozzles are designed to operate at the adjusted distribution pressure of 20 psi. Other fields utilize a combination of spray and surface irrigation techniques. Irrigation fields are contained by berms, which keep stormwater or irrigation water from running off the fields and flowing offsite.

The planting of legume crops is prohibited; therefore, typical crops cultivated at the facility are winter wheat, rye grass, or orchard grass. Other non-legume crops are acceptable but should be chosen based on the nitrogen uptake requirements. Crops with higher nitrogen uptake allow for larger amounts of nitrate to be applied to the fields during irrigation. If crop selection does not result in the anticipated yield, then seasonal reductions in the application rate shall be adjusted to prevent over-application of nitrogen.

The facility's Operation and Maintenance (O&M) Manual was last reviewed and approved on February 20, 2020. The Technical, Compliance, and Enforcement (TCE) branch of the BWPC requires O&M Manual to be updated every ten (10) years with an updated O&M Manual being due on February 20, 2030.

Outfall Summary

Outfall SUM – This external outfall is to measure and monitor the cumulative flow from Ponds 1 and 2 for discharge to irrigation fields.

Outfall SLA - This outfall is to measure the generated sludge at the bottom of Pond 2 as it is cleaned and applied on irrigable land on-site.

Outfall P01 – This external outfall is to measure and monitor wash water stored in Pond 1, including flows into its leak detection. It is the former BIOLAC pond and permitted to store wash water after cleanup and repair (see special condition table).

Outfall P02 – This external outfall is to measure and monitor washwater stored in Pond 2, including flows into its leak detection.

Outfall PW1 – This outfall is the Production Well #1 for potato washing during growing season only.

Outfall PW2 – This outfall is the Production Well #2 for potato washing outside of growing season only.

Outfall PFW – This outfall is the freshwater well to supplement irrigation when necessary. Flow may be discharge to Pond 2 or bypass to field irrigation directly.

Outfall MW1 – This outfall is monitoring well MW-01; downgradient of irrigation field 1 and south of irrigation field 2.

Outfall MW2 – This outfall is monitoring well MW-02; downgradient of irrigation field 2 and north of irrigation field 3.

Outfall MW3 – This outfall is monitoring well MW-03; downgradient of irrigation field 1 and north of irrigation field 2.

Outfall W1A – This outfall is monitoring well MW-01A; downgradient of Pond 2, next to MW-01, and south of irrigation field 2.

Outfall W4A – This outfall is monitoring well MW-04A; upgradient of Pond 1, and north of the freshwater well (Outfall PFW).

Outfall W5A – This outfall is monitoring well MW-05A; upgradient of the property boundary and northwest of Pond 1.

Effluent Characterization

Nevada State Network Discharge Monitoring Report (NetDMR) data, as reported from January 2021 to December 2025, was reviewed as part of this permit renewal process. During the monitoring period, CSS stored and discharged potato wash water for irrigation during growing season. The following averages from all outfalls are based on the reported data during the same reporting period stated above:

Notes:

mg/L: Milligrams per Liter

S.U.: Standard Units

BOD₅: Biological oxygen demand, 5-day

gal/d: Gallons per day

Mgal/d: Million gallons per day

TDS: Total dissolved solids

TSS: Total suspended solids

WL: Water level

ft AMSL: feet above mean sea level

ft bgs: feet below ground surface

Outfall PFW (Production Well-Fresh Water)

- Flow rate, 30 day avg.: 0.381 Mgal/d
- Nitrogen: 10.7 mg/L
- TDS: 653 mg/L

Outfall P02 (Pond 2)

- Freeboard, monthly: > 36 inches
- Nitrogen: 16.7 mg/L
- pH maximum: 8.06 S.U.

- pH minimum: 7.93 S.U.
- TDS: 616 mg/L

Outfall MW1 (Monitoring Well MW-1)

- Water elevation: 4,185 ft AMSL
- WL: 63.8 ft bgs
- Nitrogen: 26.1 mg/L
- pH, maximum: 7.7 S.U.
- pH, minimum: 7.6 S.U.
- Total Potassium: 16.7 mg/L
- TDS: 1,984 mg/L

Outfall MW2 (Monitoring Well MW-2)

- Water elevation: 4,185 ft AMSL
- WL: 60.0 ft bgs
- Nitrogen: 19.3 mg/L
- pH, maximum: 7.9 S.U.
- pH, minimum: 7.7 S.U.
- Total Potassium: 11.7 mg/L
- TDS: 1,504 mg/L

Outfall MW3 (Monitoring Well MW-3)

- Water elevation: 4,188 ft AMSL
- WL: 62.5 ft bgs
- Nitrogen: 35.0 mg/L (2 instances)
- pH, maximum: 7.9 S.U. (2 instances)
- pH, minimum: 7.4 S.U. (2 instances)
- Total potassium: 24.5 mg/L (2 instances)
- TDS: 2,250 mg/L (2 instances)

Outfall W1A (Monitoring Well MW-1A)

- Water elevation: 4,185 ft AMSL
- WL: 63.6 ft bgs
- Nitrogen: 31.5 mg/L (4 instances)
- pH, maximum: 7.7 S.U. (4 instances)
- pH, minimum: 7.4 S.U. (4 instances)
- Total potassium: 17.1 mg/L (4 instances)
- TDS: 1,700 mg/L (4 instances)

Outfall W4A (Monitoring Well MW-4A)

- Water elevation: 4,191 ft AMSL
- WL: 69.6 ft bgs
- Nitrogen: 18.4 mg/L
- pH, maximum: 7.8 S.U.
- pH, minimum: 7.7 S.U.
- Total potassium: 5.2 mg/L
- TDS: 1,544 mg/L

Outfall W5A (Monitoring Well MW-5A)

- Water elevation: 4,191 ft AMSL
- WL: 65.4 ft bgs
- Nitrogen: 37.0 mg/L
- pH, maximum: 7.8 S.U.
- pH, minimum: 7.7 S.U.
- Total potassium: 9.6 mg/L
- TDS: 2,552 mg/L

Outfall PPW (Discharge to Pond from Potato Wash Process)

- BOD₅: 197 mg/L
- Nitrogen, ammonia total: 4.76 mg/L
- Nitrogen, nitrate total: 0.35 mg/L
- Nitrogen: 25.9 mg/L
- Flow rate, daily maximum: 47,351 gal/d
- Flow rate, monthly maximum: 43,649 gal/d
- Total flow, monthly: 1.19 Mgal
- pH (maximum, minimum): 7.3 S.U.
- TDS: 703 mg/L
- TSS: 1,721 mg/L

Outfall LAS (Discharge to Irrigation Fields)

- BOD₅: 49 mg/L
- Nitrogen, ammonia total: 3.78 mg/L
- Nitrogen, nitrate total: 0.72 mg/L
- Nitrogen: 12.9 mg/L
- pH (maximum, minimum): 8.0 S.U.
- TDS: 615 mg/L
- TSS: 105 mg/L

Outfall PW1, P01, LD1, LA3, and LAW were not utilized during the reviewed period. CSS utilized production well 2 (Outfall PW2) as the water source for potato washing with an average monthly flow rate of 0.034 Mgal/d and average nitrogen concentration of 1.37 mg/L. Discharges from Outfall LA1 and LA2 were recorded once in August 2021. Outfall LD2 recorded a monthly average flow rate of 4.27 gal/d from the leak detection sump. Pond 2 (Outfall P02) did not have enough quantifiable flow to be recorded. One data point was recorded in August 2021 for Outfall SLA and LAT. The facility has been utilizing Outfall LAS, but primarily reported NODI (no data indicator) code "E" (Analysis not conducted / no sample) for both *flow rate* and *total flow*. Outfall MW5 (Monitoring Well MW-5) has been dry. Outfall W1C (Monitoring Well MW-1C) has only two data points and primarily reported NODI code "F" (Insufficient Flow for Sampling). An ongoing obstruction has been recorded at monitoring wells MW-3 and MW-1A since 2021.

Pollutants of Concern

Pollutants of concern are any pollutants or parameters that are believed to be present in the discharge and could affect or alter the physical, chemical, or biological condition of the receiving water. Common pollutants of concern for potato wash water discharge for crop irrigation are pH, TSS, total ammonia, and total nitrogen.

Receiving Water

Discharge is to groundwater of the State via percolation through crop field irrigation during growing season. The Permittee monitors six (6) monitoring wells around the discharge area. Average groundwater depth in the area of the irrigation fields varies between 59 feet below ground surface (ft bgs) and 71 ft bgs. No adverse effects are expected to occur in the groundwater due to the effluent reuse. The discharge of nitrate in wash water used for irrigation is limited in order to attenuate potential nitrate contributions to the uppermost aquifer, and deter potential impacts to current or prospective drinking water sources.

Compliance History

A compliance review was conducted for the previous permit term from January 2021 to December 2025. Multiple exceedances were reported on high concentrations of nitrogen across multiple monitoring wells and high BOD₅ concentrations prior to discharge into Pond 2. Per Special Condition Items 1 through 3, put in place during the previous permit period, the Permittee shall be considered in compliance with the total nitrogen limit of downgradient monitoring wells as long as long as the nitrogen balance in the approved O&M Manual is followed. In addition, the Permittee reported some inconsistency in laboratory data, incorrect unit, and inconsistent NODI code.

The latest site inspection was done on June 6, 2024, while the permit is in administrative period. The inspection report mentioned that these exceedances were communicated to the Permittee and recommended consistency when filling in quarterly discharge monitoring reports (DMRs) submission through the NetDMR system. No objectionable odor was encountered during the inspection. Pond 1 was not cleaned or utilized for wash water storage yet.

Proposed Effluent Limitations

The discharges from the facility shall be limited and monitored by the Permittee as specified below:

Groundwater Monitoring Wells Table for Sample Location Mw1 (Monitoring Well Mw-01) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Depth to water level ft below landsurface ^[1]	Daily Minimum	M&R Feet (ft)		Groundwater	MW1	Quarterly	DISCRT
Water level relative to mean sea level ^[2]	Daily Maximum	M&R Feet (ft)		Groundwater	MW1	Quarterly	DISCRT
Calcium, total (as Ca)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT
Magnesium, total (as Mg)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT
Nitrogen, total	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT
pH	Value		M&R Standard Units (SU)	Groundwater	MW1	Quarterly	DISCRT
Potassium, total (as K)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT
Sodium, total (as Na)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW1	Quarterly	DISCRT

Notes (Groundwater Monitoring Wells Table):

1. Depth to groundwater (ft).
2. Groundwater elevation (ft AMSL).

Groundwater Monitoring Wells Table for Sample Location Mw2 (Monitoring Well Mw-02) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Depth to water level ft below landsurface ^[1]	Daily Minimum	M&R Feet (ft)		Groundwater	MW2	Quarterly	DISCRT
Water level relative to mean sea level ^[2]	Daily Maximum	M&R Feet (ft)		Groundwater	MW2	Quarterly	DISCRT
Calcium, total (as Ca)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT
Magnesium, total (as Mg)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT
Nitrogen, total	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT
pH	Value		M&R Standard Units (SU)	Groundwater	MW2	Quarterly	DISCRT
Potassium, total (as K)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT
Sodium, total (as Na)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW2	Quarterly	DISCRT

Notes (Groundwater Monitoring Wells Table):

1. Depth to groundwater (ft).
2. Groundwater elevation (ft AMSL).

Groundwater Monitoring Wells Table for Sample Location Mw3 (Monitoring Well Mw-03) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Depth to water level ft below landsurface ^[1]	Daily Minimum	M&R Feet (ft)		Groundwater	MW3	Quarterly	DISCRT
Water level relative to mean sea level ^[2]	Daily Maximum	M&R Feet (ft)		Groundwater	MW3	Quarterly	DISCRT
Calcium, total (as Ca)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT
Magnesium, total (as Mg)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT
Nitrogen, total	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT
pH	Value		M&R Standard Units (SU)	Groundwater	MW3	Quarterly	DISCRT
Potassium, total (as K)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT
Sodium, total (as Na)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	MW3	Quarterly	DISCRT

Notes (Groundwater Monitoring Wells Table):

1. Depth to groundwater (ft).
2. Groundwater elevation (ft AMSL).

Groundwater Monitoring Wells Table for Sample Location W1a (Monitoring Well Mw-1A) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Depth to water level ft below landsurface ^[1]	Daily Minimum	M&R Feet (ft)		Groundwater	W1A	Quarterly	DISCRT
Water level relative to mean sea level ^[2]	Daily Maximum	M&R Feet (ft)		Groundwater	W1A	Quarterly	DISCRT
Calcium, total (as Ca)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W1A	Quarterly	DISCRT
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W1A	Quarterly	DISCRT
Magnesium, total (as Mg)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W1A	Quarterly	DISCRT
Nitrogen, total	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Groundwater	W1A	Quarterly	DISCRT
pH	Value		M&R Standard Units (SU)	Groundwater	W1A	Quarterly	DISCRT
Potassium, total (as K)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W1A	Quarterly	DISCRT
Sodium, total (as Na)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W1A	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W1A	Quarterly	DISCRT

Notes (Groundwater Monitoring Wells Table):

1. Depth to Groundwater (feet).
2. Groundwater Elevation (AMSL).

Groundwater Monitoring Wells Table for Sample Location W4a (Monitoring Well Mw-4A) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Depth to water level ft below landsurface ^[1]	Daily Minimum	M&R Feet (ft)		Groundwater	W4A	Quarterly	DISCRT
Water level relative to mean sea level ^[2]	Daily Maximum	M&R Feet (ft)		Groundwater	W4A	Quarterly	DISCRT
Calcium, total (as Ca)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W4A	Quarterly	DISCRT
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W4A	Quarterly	DISCRT
Magnesium, total (as Mg)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W4A	Quarterly	DISCRT
Nitrogen, total	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Groundwater	W4A	Quarterly	DISCRT
pH	Value		M&R Standard Units (SU)	Groundwater	W4A	Quarterly	DISCRT
Potassium, total (as K)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W4A	Quarterly	DISCRT
Sodium, total (as Na)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W4A	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W4A	Quarterly	DISCRT

Notes (Groundwater Monitoring Wells Table):

1. Depth to Groundwater (ft.)
2. Groundwater Elevation (AMSL).

Groundwater Monitoring Wells Table for Sample Location W5a (Monitoring Well Mw-5A) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Depth to water level ft below landsurface ^[1]	Daily Minimum	M&R Feet (ft)		Groundwater	W5A	Quarterly	DISCRT
Water level relative to mean sea level ^[2]	Daily Maximum	M&R Feet (ft)		Groundwater	W5A	Quarterly	DISCRT
Calcium, total (as Ca)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W5A	Quarterly	DISCRT
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W5A	Quarterly	DISCRT
Magnesium, total (as Mg)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W5A	Quarterly	DISCRT
Nitrogen, total	Daily Maximum		<= 10 Milligrams per Liter (mg/L)	Groundwater	W5A	Quarterly	DISCRT
pH	Value		M&R Standard Units (SU)	Groundwater	W5A	Quarterly	DISCRT
Potassium, total (as K)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W5A	Quarterly	DISCRT
Sodium, total (as Na)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W5A	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Groundwater	W5A	Quarterly	DISCRT

Notes (Groundwater Monitoring Wells Table):

1. Depth to Groundwater (ft.)
2. Groundwater Elevation (AMSL).

Re-use Discharge Limitations Table for Sample Location Sum (Effluent Discharge To Fields) To Be Reported Monthly

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Flow rate	30 Day Average	≤ 0.75 Million Gallons per Day (Mgal/d)		Prior to Irrigation	SUM	Continuous	METER
Flow rate	Daily Maximum	≤ 1.0 Million Gallons per Day (Mgal/d)		Prior to Irrigation	SUM	Continuous	METER
Flow, total	Monthly Total ^[1]	M&R Million Gallons (Mgal)		Prior to Irrigation	SUM	Monthly When Discharging	CALCTD
pH, maximum	Daily Maximum		≤ 9.0 Standard Units (SU)	Prior to Irrigation	SUM	Monthly When Discharging	DISCRT
pH, minimum	Daily Minimum		≥ 6.0 Standard Units (SU)	Prior to Irrigation	SUM	Monthly When Discharging	DISCRT
Nitrogen, ammonia total (as N)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Prior to Irrigation	SUM	Monthly When Discharging	DISCRT
Nitrogen, total	Daily Maximum	M&R Pounds per Day (lb/d) ^[2]	M&R Milligrams per Liter (mg/L)	Prior to Irrigation	SUM	Monthly When Discharging	DISCRT
Solids, total suspended	Daily Maximum		M&R Milligrams per Liter (mg/L)	Prior to Irrigation	SUM	Monthly When Discharging	DISCRT

Notes (Re-use Discharge Limitations Table):

- Sum of flows out of Pond 1 and Pond 2 for field irrigation.
- Loading (lb/d) = Flow Rate (gal/d) x Concentration (mg/L) x 8.34.

NS OTHER - Discharge Limitations Table for Sample Location Pfw (Production Well - Fresh Water Well) To Be Reported Quarterly^[1]

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Intake from Well	PFW	Continuous	METER

Notes (NS OTHER - Discharge Limitations Table):

1. To be used to supply irrigation during growing season only (April through October). May discharge to Pond 2 or bypass it directly to the field.

NS OTHER - Discharge Limitations Table for Sample Location Pfw (Production Well - Fresh Water Well) To Be Reported Annually^[1]

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Calcium, total (as Ca)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Intake from Well	PFW	Annual	DISCRT
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Intake from Well	PFW	Annual	DISCRT
Magnesium, total (as Mg)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Intake from Well	PFW	Annual	DISCRT
Nitrogen, total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Intake from Well	PFW	Annual	DISCRT
Potassium, total (as K)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Intake from Well	PFW	Annual	DISCRT
Sodium, total (as Na)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Intake from Well	PFW	Annual	DISCRT
pH	Value		M&R Standard Units (SU)	Intake from Well	PFW	Annual	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Intake from Well	PFW	Annual	DISCRT

Notes (NS OTHER - Discharge Limitations Table):

1. Annual sampling shall be done during growing season (April through October).

NS OTHER - Discharge Limitations Table for Sample Location Pw1 (Production Well #1) To Be Reported Monthly^[1]

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Flow rate	Monthly Average	M&R Million Gallons per Day (Mgal/d)		Intake from Well	PW1	Continuous	METER

Notes (NS OTHER - Discharge Limitations Table):

1. For use during growing season only (April through October).

DRAFT

NS OTHER - Discharge Limitations Table for Sample Location Pw2 (Production Well #2) To Be Reported Monthly^[1]

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Flow rate	Monthly Average	M&R Million Gallons per Day (Mgal/d)		Intake from Well	PW2	Continuous	METER

Notes (NS OTHER - Discharge Limitations Table):

1. For use outside of growing season only (November through March).

NS OTHER - Discharge Limitations Table for Sample Location Sla (Sludge - Land Application) To Be Reported Annually

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Volume, total	Annual Total	M&R Million Gallons per Year (Mgal/yr)		See Footnote ^[1]	SLA	Annual	CALCTD

Notes (NS OTHER - Discharge Limitations Table):

1. Collected sludge at the bottom of Pond 2 for on-site land application.

DRAFT

Ponds / Rapid Infiltration Basins for Sample Location P01 (Pond 1) To Be Reported Quarterly^{[1][2]}

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Flow rate	Daily Maximum	M&R Gallons per Day (gal/d)		Effluent Gross	P01	Continuous	METER
Flow rate	30 Day Average	M&R Gallons per Day (gal/d)		Effluent Gross	P01	Continuous	METER
Freeboard	Daily Minimum	>= 36 Inches (in)		See Footnote ^[3]	P01	Quarterly	VISUAL
pH, maximum	Daily Maximum		<= 9 Standard Units (SU)	Effluent Gross	P01	Quarterly	DISCRT
pH, minimum	Daily Minimum		>= 6 Standard Units (SU)	Effluent Gross	P01	Quarterly	DISCRT
Oxygen, dissolved (DO)	Daily Minimum		M&R Milligrams per Liter (mg/L)	Effluent Gross	P01	Quarterly	DISCRT
Liner Leakage Rate	Daily Maximum	<= 650 Gallons per Acre per Day (gal/acre/d) ^[4]		See Footnote ^[5]	P01	Continuous	METER

Notes (Ponds / Rapid Infiltration Basins):

1. Permitted to use for wash water storage after sludge removal and liner repair. See Special Approvals/Conditions Table.
2. Flow into Pond 1 from the main facility.
3. Staff gauge or sidewall depth markings for Pond 1.
4. Based on 500 gallons per acre-day for a 1.3-acre pond. See B.PB.5.5.
5. Report flow pumped from leak detection sump for Pond 1. The reporting requirement is needed only when the pond is in use.

Ponds / Rapid Infiltration Basins for Sample Location P02 (Pond 2) To Be Reported Quarterly^[1]

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Flow rate	Daily Minimum	M&R Gallons per Day (gal/d)		Effluent Gross	P02	Continuous	METER
Flow rate	30 Day Average	M&R Gallons per Day (gal/d)		Effluent Gross	P02	Continuous	METER
Freeboard	Daily Minimum	>= 36 Inches (in)		See Footnote ^[2]	P02	Quarterly	VISUAL
pH, maximum	Daily Maximum		<= 9 Standard Units (SU)	Effluent Gross	P02	Quarterly	DISCRT
pH, minimum	Daily Minimum		>= 6 Standard Units (SU)	Effluent Gross	P02	Quarterly	DISCRT
Oxygen, dissolved (DO)	Daily Minimum		M&R Milligrams per Liter (mg/L)	Effluent Gross	P02	Quarterly	DISCRT
Liner Leakage Rate	Daily Maximum	<= 1850 Gallons per Acre per Day (gal/acre/d) ^[3]		See Footnote ^[4]	P02	Continuous	METER

Notes (Ponds / Rapid Infiltration Basins):

1. Flow into Pond 2 from the main facility.
2. Staff gauge or sidewall depth markings for Pond 2.
3. Based on 500 gallons per acre-day for a 3.7-acre pond. See B.PB.5.5.
4. Report flow pumped from leak detection sump for Pond 2. The reporting requirement is needed only when the pond is in use.

Summary of Changes From Previous Permit

The following outfalls and all reporting related to those locations were removed for outfalls consolidation and dry monitoring well:

- Outfall LA1: Land Application Site, Discharge to Irrigation Field 1.
- Outfall LA2: Land Application Site, Discharge to Irrigation Field 2.
- Outfall LA3: Land Application Site, Discharge to Irrigation Field 3.
- Outfall LAT: Land Application Site, Discharge to Irrigation Fields & Land Application - Total Flow.
- Outfall LAW: Land Application Site, Discharge to Land Application (Non Irrigation Season).
- Outfall LD1: Internal Outfall, Leak Detection for Pond 1.
- Outfall LD2: Internal Outfall, Leak Detection for Pond 2.
- Outfall PPW: Internal Outfall, Discharge to Pond From Potato Wash Process.
- Outfall MW5: Monitoring Well, Monitoring Well - CMW #5.
- Outfall W1C: Monitoring Well, Monitoring Well - MW-1C.

Coordinates for the following facility and outfalls are adjusted to be as close as where they are located:

- The main potato washing facility from latitude and longitude of "40.95340780, -117.74472710"

to "40.95013650, -117.747869".

- Outfall SUM from latitude and longitude of "40.938611, -117.760278" to "40.93634330, -117.762245"
- Outfall P01 from latitude and longitude of "40.940951, -117.755020" to "40.94097920, -117.755036".
- Outfall P02 from latitude and longitude of "40.939857, -117.755407" to "40.93979590, -117.755422".

The following revisions, addition, and removal of parameters in this permit were made to maintain consistency with similar permitted facilities in the State of Nevada and to comply with Nevada's regulations.

Outfall SUM: Effluent Discharge to Fields

- Outfall renamed from LAS to SUM
- Removed: *BOD, 5-day, 20 deg. C* with "Monthly Maximum" base and " ≤ 30 Milligrams per Liter (mg/L)" concentration limit.
- Removed: *Nitrogen, nitrite total (as N)* with "Monthly Maximum" base and "M&R Milligrams per Liter (mg/L)" concentration limit.
- Added: *Nitrogen, total*, a new Concentration unit of "M&R Pounds per Day (lb/d)" to count for effluent nitrogen loading. The other discharge limitations and monitoring requirements were unchanged from the previous permit.
- Revised: Monitoring location from "Effluent Gross" to "Prior to Irrigation" for all parameters.
- Revised: Measurement frequency from "Monthly" to "Monthly When Discharging" for all parameters except Flow rates.
- Revised: Discharge limitation base from "Monthly Maximum" to "Daily Maximum" for maximum pH, TSS, BOD₅, total ammonia, and total nitrogen.
- Revised: *pH, minimum* from "Monthly Minimum" to "Daily Minimum" base.
- Revised: Footnote 1. Sum of flows out of Pond 1 and Pond 2 for field irrigation.
- Revised: Footnote 2. Loading (lb/day) = Flow Rate (gal/d) x Concentration (mg/L) x 8.34.
- Removed from *Nitrogen, total* parameter: Footnote - 3. See special condition for nitrogen balance.

Outfall PFW: Production Well - Fresh Water Well

To be reported Quarterly:

- Removed: *Solids, total dissolved* with "Quarterly Maximum" base, "M&R Milligrams per Liter (mg/L)" concentration limit, "Quarterly" measurement frequency, and "DSCRT" sample type.
- Removed: *Nitrogen, total* with "Quarterly Maximum" base, "M&R Milligrams per Liter (mg/L)" concentration limit, "Quarterly" measurement frequency, and "DSCRT" sample type.
- Revised: Monitoring location from "Groundwater" to "Intake from Well" and sample location from "MWF" to "PFW" for all parameters.
- Revised: *Flow rate* with "30 Day Average" base from "Monthly" to "Continuous" monitoring frequency and from "DISCRT" to "METER" sample type.
- Revised: Footnote 1. To be used to supply irrigation during growing season only (April through October). May discharge to Pond 2 or bypass it directly to the field.

To be reported Annually:

- Removed: *pH, minimum* with "Daily Minimum" base, "M&R Standard Units (SU)" concentration limit, "Annual" measurement frequency, and "DISCRT" sample type.
- Removed: *Nitrogen, Kjeldahl, total (as N)* with "Annual Maximum" base and "M&R Milligrams per Liter (mg/L)" concentration limit.
- Removed: *Nitrogen, nitrate total (as N)* with "Annual Maximum" base and "M&R Milligrams per Liter (mg/L)" concentration limit.
- Revised: Monitoring location from "Groundwater" to "Intake from Well" for all parameters.
- Revised: Sample location from "MWF" to PFW" for all parameters.
- Revised: parameter "pH, maximum" to "pH" and from "Annual Maximum" to "Value" base due to no specific required concentration limit, and the Permittee does not take multiple readings in a year.
- Revised: Discharge limitation base from "Annual Maximum" to "Daily Maximum" for all remaining

parameters.

- Revised: Footnote 1. Annual sampling shall be done during growing season (April through October).

Outfall PW1: Production Well #1

- Added: Footnote 1. For use during growing season only (April through October).
- Removed: *Nitrogen, total* with "Monthly Maximum" base and "M&R Milligrams per Liter (mg/L)" concentration limit.
- Revised: *Flow rate* from "Monthly Maximum" to "Daily Maximum" base, from "WW1" to "PW1" sample location, and from "Monthly" to "Continuous" measurement frequency.

Outfall PW2: Production Well #2

- Added: Footnote 1. For use outside of growing season only (November through March).
- Removed: *Nitrogen, total* with "Monthly Maximum" base and "M&R Milligrams per Liter (mg/L)" concentration limit.
- Revised: *Flow rate* from "Monthly Maximum" to "Daily Maximum" base, from "WW2" to "PW2" sample location, and from "Monthly" to "Continuous" measurement frequency.

Outfall P01: Pond 1

- Removed: *Nitrogen, total* with "Quarterly Maximum" base and "M&R Milligrams per Liter (mg/L)" concentration limit.
- Removed: *Solids, total dissolved* with "Quarterly Maximum" base and " $\leq 1,000$ Milligrams per Liter (mg/L)" concentration limit.
- Added: *Oxygen, dissolved (DO)* with "Daily Minimum" base, "M&R Milligrams per Liter (mg/L)" concentration limit, "Effluent Gross" monitoring location, "P01" sample location, "Quarterly" measurement frequency, and "DISCRT" sample type.
- Added: *Liner Leakage Rate* with "Daily Maximum" base, " ≤ 650 Gallons per Acre per Day (gal/acre/d)" quantity limit, "See Footnote" monitoring location, "P01" sample location, "Continuous" measurement frequency, and a "METER" sample type.
- Revised: *Flow rate* with "Daily Maximum" base; from "M&R Million Gallons per Day (Mgal/d)" to "M&R Gallons per Day (gal/d)" discharge quantity limit; and from "Daily When Discharging" to "Continuous" measurement frequency.
- Revised: *Flow rate* with "30 Day Average" base from "M&R Million Gallons per Day (Mgal/d)" to "M&R Gallons per Day (gal/d)" discharge quantity limit; and from "Daily When Discharging" to "Continuous" measurement frequency.
- Revised: *Freeboard* from "Monthly Minimum" to "Daily Minimum" base, from "Internal Monitoring Point" to "See Footnote" monitoring location, and measurement frequency from "Monthly" to "Quarterly".
- Added: *Footnotes 1, 2, 3, 4, and 5.*

1. Permitted to use for wash water storage after sludge removal and liner repair. See Special Approvals/Conditions Table.
2. Flow into Pond 1 from the main facility.
3. Staff gauge or sidewall depth markings for Pond 1.
4. Based on 500 gallons per acre-day for a 1.3-acre pond. See B.PB.5.5.
5. Report flow pumped from leak detection sump for Pond 1. The reporting requirement is needed only when the pond is in use.

Outfall P02: Pond 2

- Removed: *Nitrogen, total* with "Quarterly Maximum" base and "M&R Milligrams per Liter (mg/L)" concentration limit.
- Removed: *Solids, total dissolved* with "Quarterly Maximum" base and " $\leq 1,000$ Milligrams per Liter (mg/L)" concentration limit
- Added: *Oxygen, dissolved (DO)* with "Daily Minimum" base, "M&R Milligrams per Liter (mg/L)"

concentration limit, "Effluent Gross" monitoring location, "P02" sample location, "Quarterly" measurement frequency, and "DISCRT" sample type.

- Added: *Liner Leakage Rate* with "Daily Maximum" base, " $\leq 1,850$ Gallons per Acre per Day (gal/acre/d)" quantity limit, "See Footnote" monitoring location, "P02" sample location, "Continuous" measurement frequency, and "METER" sample type.
- Revised: *Flow rate* with "Daily Maximum" base, from "M&R Million Gallons per Day (Mgal/d)" to "M&R Gallons per Day (gal/d)" discharge quantity limit, and from "Daily When Discharging" to "Continuous" measurement frequency.
- Revised: *Flow rate* with "30 Day Average" base, from "M&R Million Gallons per Day (Mgal/d)" to "M&R Gallons per Day (gal/d)" discharge quantity limit, and from "Daily When Discharging" to "Continuous" measurement frequency.
- Revised: *Freeboard* from "Monthly Minimum" to "Daily Minimum" base, from "Internal Monitoring Point" to "See Footnote" monitoring location, and from "Monthly" to "Quarterly" measurement frequency.
- Added: *Footnotes 1, 2, 3, and 4.*
 1. Flow into Pond 2 from the main facility.
 2. Staff gauge or sidewall depth markings for Pond 2.
 3. Based on 500 gallons per acre-day for a 3.7-acre pond. See B.PB.5.5.
 4. Report flow pumped from leak detection sump for Pond 2. The reporting requirement is needed only when the pond is in use.

Outfall SLA: Sludge Land Application

- Removed: *Volume, total* with "Monthly Total" base, "M&R Gallons per Month (gal/mo)" quantity limit, "Daily When Discharging" measurement frequency, and "CALCTD" sample type.
- Removed: *Crop yield* with "Annual Total" base, "M&R Pounds per Acre (lb/acr)" quantity limit, "Continuous" measurement frequency, and "CALCTD" sample type.
- Removed: *Area of disposal used* with "Annual Total" base, "M&R Acres (acr)" quantity limit, "Annual" measurement frequency, and "CALCTD" sample type.
- Revised: *Volume, total* with "Annual Total" base from "Beneficial Reuse" to "See Footnote" monitoring location.
- Revised: Footnote 1. Collected sludge at the bottom of Pond 2 for on-site land application.

Monitoring Wells (Outfalls MW1, MW2, MW3, W1A, W4A, and W5A)

- Removed: *Nitrogen, Kjeldahl, total (as N)* with "Quarterly Maximum" base and "M&R Milligrams per Liter (mg/L)" concentration limit.
- Removed: *Nitrogen, nitrate total (as N)* with "Quarterly Maximum" base and "M&R Milligrams per Liter (mg/L)" concentration limit.
- Removed: *pH, minimum* with "Quarterly Minimum" base and "M&R Standard Units (SU)" concentration limit.
- Revised: Parameter "pH, maximum" to "pH" and from "Quarterly Maximum" to "Value" base due to no specific required concentration limit, and the Permittee does not take multiple readings per quarter.
- Revised: Limitation base from "Quarterly Maximum" to "Daily Minimum" for *Depth to water level ft below landsurface*.
- Revised: Limitation base from "Quarterly Maximum" to "Daily Maximum" for all remaining parameters.

Schedule of Compliance

- Revised: Item 1. The Permittee shall submit two (2) copies, one hard copy and one digital copy, of an updated Operations and Maintenance (O&M) Manual for review and acceptance by the Division. The O&M Manual shall be compiled in accordance with appropriate sections of *WTS2: Minimum Information Required for an Operations and Maintenance Manual*, and be prepared and wet stamped by a licensed, qualified Nevada engineer (P.E.). The manual shall include annual nitrogen budget calculation in accordance with *WTS-1D: Nitrogen Budget and Determination for Land Application Sites*.

- Removed: Items 2, 3, and 4.

Special Conditions

- Revised: Item 3. The Permittee will be considered in compliance with the total nitrogen limit for all monitoring wells as long as the nitrogen balance in the approved O&M Manual is followed. Sections B.MW.3 through B.MW.4 of the standard conditions attached to this permit are not applicable.
- Renumbered: Item 6 to Item 4.
- Revised: Item 5. The potato wash water does not meet the definition of "reclaimed water" per NAC 445A.27445 and Section B.R.U. of the standard conditions attached to this permit is not applicable.
- Removed: Item 6.

Technology Based Effluent Limitations

Technology based effluent limitations are not applicable to this permit.

Water Quality Based Effluent Limitations

Water quality based effluent limitations are not applicable to this permit.

Basis for Effluent Limitations

There are currently no specific water quality standards that have been formally adopted by the State for groundwater. However, the Division has the discretion to implement effluent limitations outside water quality standards per Nevada Administrative Code (NAC) 445A.243, which states, "In establishing an effluent limitation to carry out the policy of this State set forth in Nevada Revised Statutes (NRS) 445A.305, consideration must be given to, but is not limited by the following: ... (2) the need for standards that specify by chemical, physical, biological or other characteristics the extent to which pollution by various substances will not be tolerated."

The following limitations are applied to this permit renewal:

- All of the flow rates shall be M&R (monitor and report) except for flow into leak detection sumps. Potato wash water shall be utilized for irrigation during the growing season. Outside of the growing season, washwater shall be stored in the ponds. The daily maximum flow rate limit of 1.0 Mgal/d is retained per the applicable fee category. The actual discharge rate is much lower than the permitted amount and varies with the growing season.
- Total nitrogen is required because no treatment is applied to the washwater prior to discharge and to assist in developing the Permittee's nitrogen loading limits. The requirement that total nitrogen remain below of equal to 10 mg/L in all monitoring wells is retained to protect Nevada's groundwater. This is done to be consistent with similarly permitted facility despite historical elevated nitrogen concentration.
- A pH range between 6 and 9 SU, representing an acceptable neutral range, is retained for discharge to groundwater.
- The permit retains TSS monitoring to reduce the risk of clogging in sprinklers and pivots.
- The permit establishes DO monitoring in both ponds. The presence of DO indicates living algae and helps prevent foul odor production that could affect staff and nearby resident.
- Groundwater monitoring through nearby monitoring wells is required to ensure that the use of washwater does not degrade the State's groundwater. The permit retains the requirement to monitor for constituents found in fertilizer due to the nature of the site.

Anti-backsliding

None of the proposed permit limits were changed to a less restrictive limit compared to those in the previous permit. In the previous permit, BOD₅ was required to be monitored to ensure that effluent discharge does not cause nuisance issues, most notably odor, and does not cause oxygen deprivation in soil. The most recent site inspection was conducted on June 6, 2024, and no foul odor was detected around the wash water storage reservoir or the irrigated field. In addition, due to the nature of water use, the treatment process, and the effluent discharge practices, the Division's BOD₅ standard no longer applies.

Total nitrogen accounts for Total Kjeldahl Nitrogen (TKN) and Nitrate + Nitrite. Therefore, removal of TKN and Total nitrate from the parameters required to be sampled and monitored at all monitoring wells is not less restrictive compared to the previous permit.

Monitoring of total nitrogen concentration in all source wells (Outfall PFW, PW1, and PW2) is removed due to the nature of the facility and the absence of any treatment applied to the wash water.

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 NRS 445A.520 and NRS 445A.565 and is consistent with the federal antidegradation policy found at Title 40 in the Code of Federal Regulations (CFR) § 131.12. The objective of the Division's antidegradation regulation is to prevent degradation of Nevada's surface waters and maintain the unique attributes and special characteristics and water quality associated with high quality surface waters. As this permit is for discharges to groundwater, and not surface water, the antidegradation regulation is not applicable.

Special Conditions

See special approvals/conditions table below:

SA – Special Approvals / Conditions Table

Item #	Description
1	Within the growing season (April through October), the Permittee shall use water from Production Well #1 for potato washing, which historically contain total nitrogen concentration of greater than 10 mg/L.
2	Outside of growing season (November through March), the Permittee shall use water from Production Well #2 for potato washing, which historically contain total nitrogen concentration of lower than 10 mg/L.
3	The Permittee will be considered in compliance with the total nitrogen limit for all monitoring wells as long as the nitrogen balance in the approved O&M Manual is followed. Sections B.MW.3 through B.MW.4 of the standard conditions attached to this permit are not applicable.
4	Prior to using Pond 1 for wash water storage, it shall be cleaned, all sludge shall be removed, and the liner shall be repaired. The Permittee shall submit a 90-days notice to NDEP prior to this process.
5	The potato wash water does not meet the definition of "reclaimed water" per NAC 445A.27445 and Section B.R.U. of the standard conditions attached to this permit is not applicable.

Discharges From Future Outfalls/ Planned Facility Changes

The Permittee anticipates no discharges from any future outfalls or planned facility changes.

Corrective Action Sites

There are two Bureau of Corrective Actions (BCA) remediation sites located within a one-mile radius of the permitted discharge area.

- Facility name: Old Gas Station - West Winnemucca
Status: Closed
Contaminant type: Total petroleum hydrocarbons (TPH)
- Facility name: Pacific Pride
Status: Open
Contaminant type: Gasoline

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.

DRAFT

Schedule of Compliance:

SOC – Schedule of Compliance Table

Item #	Description	Due Date
1	The Permittee shall submit two (2) copies, one hard copy and one digital copy, of an updated Operations and Maintenance (O&M) Manual for review and acceptance by the Division. The O&M Manual shall be compiled in accordance with appropriate sections of <i>WTS-2: Minimum Information Required for an Operations and Maintenance Manual</i> , and be prepared and wet stamped by a licensed, qualified Nevada engineer (P.E.). The manual shall include annual nitrogen budget calculation in accordance with <i>WTS-1D: Nitrogen Budget and Determinations for Land Application Sites</i> .	2/20/2030

DRAFT

Deliverable Schedule:

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

Item #	Description	Interval	First Scheduled Due Date
1	Quarterly DMRs	Quarterly	1/28/2027
2	Annual DMRs	Annually	1/28/2028

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. **11/25/2026**, 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: **Florida Nasategay**

Date: **10/21/2026**

Title: **Staff I, Associate Engineer**