



A division of the
Nevada Department of Conservation & Natural Resources

NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

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FACTSHEET
(pursuant to NAC 445A.236)

Permittee Name: CITY OF NORTH LAS VEGAS
2829 FORT SUMTER DR.
NORTH LAS VEGAS, NV 89030

Permit Number: NV0024121

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

Designation: MINOR NPDES

New/Existing: EXISTING

Location: CITY OF NORTH LAS VEGAS UTILITIES WATER SYSTEM OPERATIONS
AND MAINTENANCE, CLARK
2829 FORT SUMTER DR., NORTH LAS VEGAS, NV 89030
LATITUDE: 36.211519, LONGITUDE: -115.125219
TOWNSHIP: T20S, RANGE: R61E, SECTION: S14

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Latitude	Longitude	Receiving Water
001	LAS VEGAS WASH AND ITS TRIBUTARIES	External Outfall		36.087865	-114.985498	LAS VEGAS WASH
002	APEX DRY LAKE	External Outfall		36.446282	-114.878990	GROUNDWATER
SUM	TOTAL DISCHARGE	Sum		36.087865	-114.985498	LAS VEGAS WASH AND GROUNDWATER

Permit History/Description of Proposed Action

The Permittee, City of North Las Vegas (CNLV), has applied for the renewal of their National Pollutant Discharge Elimination System (NPDES) permit, NV0024121. The permit allows the CNLV to discharge treated drinking water, groundwater, and other miscellaneous water from the various distribution systems and facilities within the CNLV's water service areas to either the Las Vegas Wash (Outfall 001) or Apex Dry Lake (Outfall 002).

Facility Overview

The CNLV operates and maintains the distribution systems, wells, and storage facilities of potable water identified in their service area, this includes the water system located at the Apex Industrial Park. The system consists of more than 1,100 miles of underground water pipeline, 20 reservoirs and tanks which store more than 80 million gallons of treated drinking water, 10 pumping stations, and 5 production wells. The Las Vegas Wash (Outfall 001) receives discharges, via the storm drain system, from the water system that serves the Las Vegas Valley while the Apex Dry Lake (Outfall 002) receives discharges from the water system that serves the Apex Industrial park.

As stated above, this permit allows the CNLV to discharge treated drinking water, groundwater, and other miscellaneous water from the distribution systems and facilities of the water service areas. A description of each discharge is below:

Treated Drinking Water: Discharge of treated drinking water occurs when maintenance and repairs are required on various parts of the water distribution system which can include, but is not limited to, pressure releases, reservoir dewatering, distribution line testing, fire hydrant flow testing, flushing and dewatering of water mains and pipelines, meter calibration, and backflow preventer testing. Flow rates from these discharges can range from 2 gallons per minute (gpm) to 4,500 gpm.

Groundwater: Discharge of groundwater occurs during well exercising and flushing operations and during the development of new wells. Drinking water wells typically pull water from 300 feet below ground surface (bgs) to 1,500 feet bgs. Depending on the depth the water is pulled from, flow rates from these discharges can range from 100 gpm to 3,500 gpm.

Miscellaneous Water: Discharge of miscellaneous water includes subsurface vault and/or underground structure dewatering. The CNLV must periodically dewater subsurface vaults and underground structures to protect equipment or to safely perform repairs, maintenance, and/or installation of equipment. The volume of water discharged varies greatly and is dependent on system leaks, groundwater seepage, and rainfall amounts.

Discharge rates are estimated based on facility capacities and capabilities and worst-case failures. The system may experience no discharge many days, while other days may have substantial and multiple discharges depending upon operational maintenance and/or repair needs as well as emergencies.

During this permit cycle, the Permittee will be replacing three drinking water supply wells. The new wells, which will be drilled to approximately 1,000 feet, will be constructed to provide the same capacity as the existing wells. After the new wells have been drilled, constructed, tested, and placed into service, the existing wells will be properly abandoned and plugged.

The CNLV's Operation and Maintenance (O&M) Manual was last reviewed and approved on March 24, 2022. The Technical, Compliance, and Enforcement Branch of the Bureau of Water Pollution Control requires O&M Manuals to be updated ten (10) years with an updated O&M Manual being due on March 24, 2032.

Outfall Summary

Outfall 001 - This external outfall is for measuring and monitoring of the treated drinking water, groundwater, and other miscellaneous water (from the CNLV's water service areas) to the Las Vegas Wash.

Outfall 002 - This external outfall is for measuring and monitoring of the treated drinking water, groundwater, and other miscellaneous water (from the CNLV's water service areas) to the Apex Dry Lake.

Effluent Characterization

Nevada State Network Discharge Monitoring Report (NetDMR) data, as reported from January 2020 to March 2026, was reviewed as part of this permit renewal process. The long-term daily maximum flow rate was 0.37 million gallons per day (Mgal/d). Based on the numbers reported, there were no exceedances of this limit.

Notes:

ug/L = Micrograms per Liter

lbs/day = Pounds per Day

mg/L = Milligrams per Liter

Gal/d = Gallons per Day

Mgal/mo. = Million Gallons per Month

N = Nitrogen
 S.U.= Standard Units
 TDS = Total Dissolved Solids
 TIN = Total Inorganic Nitrogen

Outfall 001 (Discharging to the Las Vegas Wash):

Flow Total: 1.48 Mgal/mo
 Ammonia as N: 0.157 lbs/day
 Arsenic: 1.63 ug/L
 Boron: 103.8 ug/L
 Copper: 30.20 ug/L
 Fluoride: 467.25 ug/L
 Lead: 0.52 ug/L (one instance, remainder were non-detect)
 Molybdenum: 5.22 ug/L
 Nitrate (as N): 0.49 mg/L
 pH: 7.56 S.U.
 TDS: 396 m/L
 TIN: 0.47 mg/L
 Zinc: 104.28 ug/L

Outfall 002 (Discharging to Apex Dry Lake):

Flow Rate: 0.12 Mgal/d
 Flow Total: 0.17 Mgal/mo.
 Alkalinity: 181 mg/L
 Arsenic: 0.004 mg/L
 Barium: 0.03 mg/L
 Calcium: 111 mg/L
 Chloride: 167 mg/L
 Fluoride: 1.53 mg/L
 Iron: 0.16 mg/L
 Magnesium: 53.7 mg/L
 Manganese: 0.01 mg/L
 Nickel: 0.01 mg/L
 Nitrite+Nitrate total 1 det: 0.33 mg/L
 Nitrogen, total: 0.20 mg/L
 pH: 7.58 S.U.
 Potassium: 13.55 mg/L
 Selenium: 0.01 mg/L
 Sodium: 228 mg/L
 TDS: 934 mg/L
 Sulfate: 341 mg/L
 Zinc: 0.05 mg/L

The remaining permitted constituents were not detected under both Outfalls 001 and 002 during the period reviewed.

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:

Outfall 001 (Las Vegas Wash): Ammonia as N, Boron, Chlorine, Copper, Cyanide, Iron, Mercury, Phosphorus, Selenium, TDS, total petroleum hydrocarbons (TPH), Total Trihalomethanes, along with toxic materials (as described under Nevada Administrative Code (NAC) 445A.1236).

Outfall 002 (Apex Dry Lake): Profile 1 constituents and TPH.

Total Residual Chlorine

Federal regulations at Title 40 of the Code of Federal Regulations (40 CFR) section 122.44(d)(1)(vi) provide options for a permitting authority to establish effluent limits where a state has not established water quality criterion for specific chemical pollutants present in an effluent at a concentration that causes, has the reasonable potential to cause, or contributes to an excursion above a narrative criterion within an applicable state's water quality standards (WQSs). The WQSs applicable to the receiving water prohibit the discharge of toxic substances in toxic amounts. The Division has previously determined that using a limit of 0.1 mg/L for total residual chlorine is protective of receiving water beneficial uses and so this limit was included in the previous permit. However, since no technical basis for the 0.1 mg/L value can be presented by the Division, EPA Region 9 will not accept this limit without further study, and, or sampling.

As a result, the proposed permit includes two options for the Permittee to choose from:

The first is to sample the effluent for the dechlorinating agent. Compliance with the total residual chlorine limit can be achieved by sampling for sodium bisulfite. Presence of dechlorination agent, at or above detection levels, is equivalent to absence of residual chlorine; or,

The second option is for the Permittee to conduct a study on the effects of total residual chlorine on the receiving water to determine if all designated beneficial uses are protected considering the levels of chlorine potentially discharged by the facility (see Special Approvals / Conditions Table Items #3 and #4).

Either option serves as support for the Permittee's compliance with permit conditions and are consistent with NAC 445A.250.3(b)(1). With both approach options meeting EPA's requirements.

Receiving Water

The receiving water includes the tributaries of the Las Vegas Wash, the Las Vegas Wash, and Apex Dry Lake.

The majority of the North Las Vegas facilities, wells, and pipelines discharge into multiple points throughout the Las Vegas Wash, via the storm drain system. Furthermore, the CNLV has become the provider for the Apex Industrial Park development. This water system is served by a potable water well. The receiving water for discharges from this location is to groundwater via the Apex Wash (a.k.a. Apex Dry Lake) via drainage channels.

The discharges and discharge operations are expected to conform to groundwater discharge standards as well as the most restrictive water quality standards for the nearest downstream control point, "Las Vegas Wash at the Historic Lateral" (NAC 445A.2156).

Applicable Water Quality Standards/Beneficial Uses

For Outfall 001, the water quality standards (WQSs) for the nearest downstream control point, "Las Vegas Wash at the Historic Lateral" NAC 445A.2156 apply. WQSs for this control point protect the watering of livestock, irrigation, aquatic life, recreation not involving contact with the water, propagation of wildlife, and maintenance of a freshwater marsh beneficial uses. 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.

Outfall 002 does not have any applicable water quality standards since the Permittee is discharging to groundwater.

303 (d) Listing Status

According to the Nevada's 2020 – 2022 Water Quality Integrated Report (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 WQSs 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 treated drinking water and 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 permit was in compliance during the period reviewed.

Proposed Effluent Limitations

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

Discharge Limitations Table for Sample Location 001 (Las Vegas Wash And Its Tributaries) To Be Reported Monthly^{[1][2][4]}

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Flow rate	Daily Maximum	M&R Million Gallons per Day (Mgal/d)		Effluent Gross	001	Continuous	METER ^[3]
Flow, total	Monthly Total	M&R Million Gallons (Mgal)		Effluent Gross	001	Monthly	CALCTD
Boron, total recoverable	Daily Maximum		<= 750 Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT
Chlorine, total residual ^[8]	Daily Maximum		<= 0 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT
Chlorine, total residual ^[4]	Daily Maximum		<= 0.1 Milligrams per Liter (mg/L) ^[5]	Effluent Gross (Supplementary)	001	Once Per Batch ^[6]	DISCRT
Copper, dissolved (as Cu)	Daily Maximum		<= 29 Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT
Cyanide, free available	Daily Maximum		<= 5.2 Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT
Iron, total recoverable	Daily Maximum		<= 1000 Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT
Mercury, dissolved (as Hg)	Daily Maximum		<= 0.77 Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT
Nitrogen, ammonia total (as N)	Daily Maximum	M&R Pounds per Day (lb/d) ^[7]	M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT
Nitrogen, inorganic total	Daily Maximum		<= 20 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT

Discharge Limitations Table for Sample Location 001 (Las Vegas Wash And Its Tributaries) To Be Reported Monthly^{[1][2][4]}

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Nitrogen, nitrate total (as N)	Daily Maximum		<= 90 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT
Nitrogen, nitrite total (as N)	Daily Maximum		<= 5 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT
pH, minimum	Daily Minimum		>= 6.5 Standard Units (SU)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT
pH, maximum	Daily Maximum		<= 9.0 Standard Units (SU)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT
Phosphorus, total (as P)	Daily Maximum	M&R Pounds per Day (lb/d) ^[7]	M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Batch	DISCRT
Selenium, dissolved [as Se]	Daily Maximum		<= 6.3 Micrograms per Liter (ug/L)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT
Solids, total dissolved	Daily Maximum		<= 1900 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Batch ^[6]	DISCRT

Notes (Discharge Limitations Table):

1. Sampling requirements in this table are applicable to all types of discharges that enter the storm drain system and/or the Las Vegas Wash.
2. Sampling shall be performed at the discharge outlet prior to entering the storm drain system and/or the Las Vegas Wash. The sample shall be representative of the discharge.
3. Flow meter, estimate, or calculation.
4. All chlorinated discharges shall be sampled for total residual chlorine. A log shall be kept for this discharge type. The log shall include, but is not limited to, the date, time, discharge location, flow rate, and total residual chlorine level prior to discharge into a surface water (see Special Approvals / Condition Table Item #2).
5. Dechlorination to ≤ 0.1 mg/L is required for water with a total residual chlorine >2.0 mg/L prior to discharging to the Las Vegas Wash and/or its tributaries (see Special Approvals / Conditions Table Item #3).
6. The measurement frequency of 'Once Per Batch' refers to once per discharge event.
7. Loading: lbs/day = Flow Rate (Mgal/d) x Concentration (mg/L) x 8.34.
8. Should the Permittee choose to sample the effluent for the dechlorinating agent, compliance with the total residual chlorine (TRC) limit can be supported by sampling for sodium bisulfite (dechlorinating agent) with results at or above detection levels. If sodium bisulfite is detected, the value recorded in the DMR shall be zero for TRC. See Special Approvals / Compliance Item #5.

Discharge Limitations Table for Sample Location 001 (Las Vegas Wash And Its Tributaries) To Be Reported Annually^{[1][2]}

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	001	Annual	DISCRT
Beryllium, total recoverable (as Be)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Cadmium, dissolved (as Cd)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Chromium, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Chromium, Hexavalent [As CR] (Chromium (VI)) ^[4]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Chromium, Trivalent [As CR] (Chromium (III)) ^[4]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Fluoride, total (as F) ^[5]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Lead, dissolved (as Pb)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Manganese, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Molybdenum, total recoverable	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Nickel, total (as Ni) ^[4]	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 001 (Las Vegas Wash And Its Tributaries) To Be Reported Annually^{[1][2]}

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Silver, dissolved (as Ag)	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Sulfide, total (as S)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Zinc, dissolved (as Zn)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Acrolein	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Aldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
.alpha.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
.beta.-Endosulfan	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Chlordane (tech mix. and metabolites)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Chlorpyrifos	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
4,4-DDT	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Demeton	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 001 (Las Vegas Wash And Its Tributaries) To Be Reported Annually^{[1][2]}

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Diazinon	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Dieldrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Endrin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Azinphos-Methyl (Guthion)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Heptachlor	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Heptachlor epoxide	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Lindane	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Malathion	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Methoxychlor	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Mirex	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Nonylphenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 001 (Las Vegas Wash And Its Tributaries) To Be Reported Annually^{[1][2]}

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Parathion	Daily Maximum		Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Pentachlorophenol	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Polychlorinated biphenyls (PCBs)	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Toxaphene	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Tributyltin	Daily Maximum		M&R Micrograms per Liter (ug/L)	Effluent Gross	001	Annual	DISCRT
Hydrocarbons, total petroleum	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Annual	DISCRT

Notes (Discharge Limitations Table):

1. Applicable only to planned discharges, except for those associated with treated drinking water.
2. Sample and analyze once annually as discharge occurs. A minimum of one (1) discharge is required to be sampled, analyzed, and reported each year, if discharge occurs. If no discharge occurs use NODI Code "C" in NetDMR. The results shall be reported on the 4th quarter DMR.
4. Sampling to be done to the dissolved analysis.
5. Total recoverable.

Discharge Limitations Table for Sample Location 002 (Apex Dry Lake) To Be Reported Monthly^[1]

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Flow rate	Daily Maximum	M&R Million Gallons per Day (Mgal/d)		Effluent Gross	002	Continuous	METER ^[2]
Flow, total	Monthly Total	M&R Million Gallons (Mgal)		Effluent Gross	002	Monthly	CALCTD
Area inspection visual ^[3]	Value	<= 1 Pass=0 Fail=1 (pass/fail) ^[4]		Effluent Gross	002	Daily When Discharging	VISUAL

Notes (Discharge Limitations Table):

1. Reporting requirements in this table are applicable to all types of discharges that enter Apex Dry Lake.
2. Flow meter, estimate, or calculation.
3. Review general discharge activity logistics and identify appropriate/site-specific BMPs and assess whether the operations are carried out with due diligence and in a manner sufficient to prevent erosion and to minimize public inconvenience during each of the discharge or flushing or any other maintenance event.
4. Report '0' as 'Pass' if the visual inspection of the operations and discharge location assessment concludes adequate and appropriate BMPs were implemented during each of the discharge events through the reporting period; otherwise, report '1' as 'Fail' and submit a brief narrative regarding failed BMPs and mitigation or remedial actions implemented by the Permittee, as needed. See Special Approvals / Conditions Table item # 1 for further instructions.

Discharge Limitations Table for Sample Location 002 (Apex Dry Lake) To Be Reported Annually^{[1][2]}

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Alkalinity, bicarbonate (as CaCO ₃)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Alkalinity, total (as CaCO ₃)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Aluminum, dissolved (as Al)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Antimony, dissolved (as Sb)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Arsenic, dissolved (as As)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Barium, dissolved (as Ba)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Beryllium, dissolved (as Be)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Cadmium, dissolved (as Cd)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Calcium, dissolved (as Ca)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Chromium, dissolved (as Cr)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
			M&R				

Discharge Limitations Table for Sample Location 002 (Apex Dry Lake) To Be Reported Annually^{[1][2]}

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Copper, dissolved (as Cu)	Daily Maximum		Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Fluoride, total (as F)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Iron, dissolved (as Fe)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Lead, dissolved (as Pb)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Magnesium, dissolved (as Mg)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Manganese, dissolved (as Mn)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Mercury, dissolved (as Hg)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Nitrite plus nitrate total 1 det. (as N)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Nitrogen, total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
pH, maximum	Daily Maximum		M&R Standard Units (SU)	Effluent Gross	002	Annual	DISCRT
pH, minimum	Daily Minimum		M&R Standard Units (SU)	Effluent Gross	002	Annual	DISCRT
Potassium, dissolved (as K)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT

Discharge Limitations Table for Sample Location 002 (Apex Dry Lake) To Be Reported Annually^{[1][2]}

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Selenium, dissolved [as Se]	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Silver, dissolved (as Ag)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Sodium, dissolved (as Na)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Sulfate, total (as SO ₄)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Thallium, dissolved (as Tl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Uranium, natural, total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Cyanide, weak acid, dissociable	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Zinc, dissolved (as Zn)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT
Hydrocarbons, total petroleum	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	002	Annual	DISCRT

Notes (Discharge Limitations Table):

1. Applicable only to planned discharges, except for those associated with treated drinking water.
2. Sample and analyze once annually as discharge occurs. A minimum of one (1) discharge is required to be sampled, analyzed, and reported annually, if discharge occurs. If no discharge occurs, use NODI Code "C" in NetDMR. Report results in the 4th quarter DMR.

Discharge Limitations Table for Sample Location Sum (Total Discharge) To Be Reported Monthly^[1]

Discharge Limitations				Monitoring Requirements			
Parameter	Base	Quantity	Concentration	Monitoring Loc	Sample Loc	Measurement Frequency	Sample Type
Volume, total	Daily Maximum	M&R Million Gallons per Month (Mgal/mo)		Effluent Gross	SUM	Continuous	ESTIMA ^[2]
Flow rate	Daily Maximum	<= 5.0 Million Gallons per Day (Mgal/d)		Effluent Gross	SUM	Continuous	METER ^[3]
Number of Events	Monthly Maximum	M&R Number (#)		Effluent Gross	SUM	Monthly When Discharging	CALCTD

Notes (Discharge Limitations Table):

- Reporting requirements in this table are applicable to planned or unplanned discharges. Report data based on actual discharges to both surface water and to groundwater during the reporting period.
- Estimate or calculation.
- Flow meter, estimate, or calculation.

Summary of Changes From Previous Permit

Under Outfall 001, To Be Reported Monthly, the following parameters were added:

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

ADDED – Copper, dissolved, with a “Daily Maximum” Base, a “<=29 Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “001” Sample Location, a “Once per Batch” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Cyanide, free available, with a “Daily Maximum” Base, a “<=5.2 Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “001” Sample Location, a “Once per Batch” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Iron, total recoverable, with a “Daily Maximum” Base, a “<=1,000 Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “001” Sample Location, a “Once per Batch” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Mercury, dissolved (as Hg), with a “Daily Maximum” Base, a “<=0.77 Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “001” Sample Location, a “Once per Batch” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Nitrogen, ammonia total (as N), with a “Daily Maximum” Base, a “M&R Pounds per Day (lb/d)” Quantity, and a “M&R Milligrams per Liter (mg/L)” Concentration, an “Effluent Gross” Monitoring Location, a “001” Sample Location, a “Once per Batch” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Phosphorus, total (as P), with a “Daily Maximum” Base, a “M&R Pounds per day (lb/d)” Quantity

and a “M&R Milligrams per Liter” Concentration, an “Effluent Gross” Monitoring Location, a “001” Sample Location, a “Once per Batch” Measurement Frequency, and a “Discret” Sample Type.

ADDED – Selenium, dissolved (as Se), with a “Daily Maximum” Base, a “≤6.3 Micrograms per Liter (ug/L)” Concentration, an “Effluent Gross” Monitoring Location, a “001” Sample Location, a “Once per Batch” Measurement Frequency, and a “Discret” Sample Type.

Added – Footnote 7.

7. Loading: lbs/day = Flow Rate (Mgal/d) x Concentration (mg/L) x 8.34.

Under Outfall 001, To Be Reported Annually, the following parameters were added or deleted:

Deleted – Boron, total recoverable, with a “Daily Maximum” Base.

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

Deleted – Cyanide, total (as CN), with a “Daily Maximum” Base.

Deleted – Iron, total recoverable, with a “Daily Maximum” Base.

Deleted – Mercury, total recoverable, with a “Daily Maximum” Base.

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

Technology Based Effluent Limitations

Technology based effluent limitations are not applicable to this permit.

Water Quality Based Effluent Limitations

The following water quality based effluent limit (WQBEL) requirements, based on NAC 445A.2156, are included in the proposed permit to ensure that the discharge does not cause WQS violations. In addition, the proposed permit requires monitoring and reporting of constituents that are subject of WQSs and may be present in the discharge. Per NAC 445A.2156, sampling is required for temperature, dissolved oxygen (D.O.), total suspended solids (TSS), fecal coliform, and *E. coli*. The discharge from this facility will travel many miles through the Clark County storm drain system before finally reaching the Las Vegas Wash; therefore, sampling the discharge for temperature and D.O. is irrelevant in this instance. TSS is also not required to be sampled as both treated drinking water and groundwater, typically, has low suspended solids. Since the discharge is not associated with treated wastewater, sampling of fecal coliform and *E. coli* are not required.

The proposed permit retains a daily maximum limit of 0.1 mg/L for Chlorine, total residual, with a monthly reporting requirement.

The proposed permit retains a daily maximum limit of 20 mg/L for TIN, as prescribed under NAC 445.2156, to protect the aquatic life beneficial use, along with a monthly reporting requirement.

The proposed permit maintains a daily maximum limit of 90 mg/L for Nitrate (as N), per NAC 445.2156, to protect the aquatic life beneficial use, with a monthly reporting requirement.

The proposed permit retains the daily maximum limit of 5 mg/L for Nitrite (as N), as prescribed under NAC 445A.2156, to protect the aquatic life beneficial use, along with a monthly reporting requirement.

The proposed permit maintains a daily maximum limit of 9.0 standard units (S.U.) and a daily minimum limit of 6.5 S.U. for pH as prescribed at NAC 445A.2156 to protect the aquatic life designated beneficial use, with a monthly reporting requirement.

The proposed permit retains the requirement to sample TDS based on the water quality standards stated under NAC 445A.2156, in accordance with the requirement to maintain the RMHQ standard. Thus, a limit of

1,900 mg/L for TDS was maintained, along with an monthly reporting requirement.

The proposed permit retains the standards for toxic materials (as prescribed under NAC 445A.1236). 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. Therefore, only the toxic materials with water quality criteria to protect the aquatic life, irrigation, and watering of livestock beneficial uses apply, with an annual reporting requirement.

Reasonable Potential Analysis (RPA)

Section 301(b)(1)(c) of the CWA requires effluent limitations necessary to meet WQSs, and Title 40 of the Code of Federal Regulation (CFR) section 122.44(d) requires permits to include conditions that are necessary to achieve WQSs established under section 303 of the CWA, including state narrative criteria for water quality. Federal regulations at 40 CFR 122.44(d)(1)(i) state, "Limitations must control all pollutants or pollutant parameters (either conventional, nonconventional, or toxic pollutants) which the Director determines are or may be discharged at a level that will cause, have the reasonable potential to cause, or contribute to an excursion above any State water quality standard, including State narrative criteria for water quality." The process to determine whether a WQBEL is required as described in 40 CFR 122.44(d)(1)(i) is referred to as a reasonable potential analysis, or RPA. Furthermore, NAC 445A.243 requires the Division to consider the establishment of effluent limitations necessary to meet WQSs.

For conducting the RPA, the Division used a mass balanced approach to determine the expected critical downstream receiving water concentration using statistics recommended in the United States Environmental Protection Agency's Technical Support Document (TSD) for Water Quality Based Toxic Control for statistically calculating the projected maximum effluent concentration (i.e., Table 31 of the TSD using the 99 percent probability basis and 99 percent confidence interval). For purposes of the RPA, the critical receiving water flow was assumed to be zero (i.e., no dilution); therefore, the critical effluent pollutant concentrations were compared with the most restrictive water quality criteria under NAC 445A.1236 and NAC 445A.2156 to determine if the discharge has reasonable potential to cause, or contribute to, an excursion above a State WQS.

The RPA was based on data collected from January 2020 to March 2026 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 Copper, Cyanide, Mercury, and Selenium. Therefore, limits were included for Copper, Cyanide, and Mercury at Outfall 001.

For Outfall 002, as there are no WQSs for groundwater, an RPA was not done.

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

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

The proposed permit establishes a daily maximum limit of 29 ug/L for Copper, 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, with a monthly reporting requirement.

The proposed permit establishes a daily maximum limit of 5.2 ug/L for Cyanide, free, based on findings from the RPA and as prescribed under NAC 445A.1236 to protect the aquatic life beneficial use, with a monthly reporting requirement. NAC 445A.1236 lists water quality criteria for seven (7) metals that vary as a function of hardness. The lower the hardness, the lower the water quality criteria. The metals with hardness-dependent criteria include cadmium, chromium (III), copper, lead, nickel, silver, and zinc. The calculated hardness for the Las Vegas Wash is currently 400 mg/L.

The proposed permit establishes a daily maximum limit of 1,000 ug/L for Iron, as prescribed by NAC

445A.1236, to protect the aquatic life beneficial use, along with it being on the 303(d) list, to be reported monthly.

The proposed permit establishes a daily maximum limit of 0.77 ug/L for Mercury, dissolved (as Hg), as prescribed under NAC 445A.1236, to protect the aquatic life beneficial use, and based on findings from the RPA, with a monthly reporting requirement.

The proposed permit establishes a daily maximum limit of 6.3 ug/L for Selenium, based on it being on the 303(d) list, with a monthly reporting requirement.

Mass-Based Limits (If Applicable)

The proposed permit establishes the requirement to monitor and report pounds per day (lbs/day) quantity for Ammonia (as N), based on the TMDL established for the Las Vegas Wash, with a quarterly reporting requirement.

The proposed permit establishes the requirement to monitor and report lb/day quantity for Total Phosphorus, based on the TMDL established for the Las Vegas Wash, with a quarterly reporting requirement.

Basis for Effluent Limitations

The requirement to sample Chlorine, total residual, under Outfall 001, is due to potential carcinogenic chloroorganic compounds, such as chloroform, which may be formed if the amount of chlorine being used by the municipality is too high in concentration, along with it being toxic to aquatic life, essentially harming ecosystems.

There are currently no specific water quality standards that have been formally adopted by the State for groundwater (Outfall 002, Apex Dry Lake). However, the Division has the discretion to implement effluent limitations outside water quality standards per NAC 445A.243, which states, "In establishing an effluent limitation to carry out the policy of this State set forth in 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 requirement to monitor the effluent for Profile 1 pollutants each year is included to evaluate the quality of the effluent and determine whether the effluent has potential to impact the receiving water. Although cyanide and uranium are not expected to be present in the effluent, the proposed permit requires the Permittee sample these constituents annually as they are included in the Profile 1 list.

The constituents listed in Profile 1 have been vetted by the Division and have been included in groundwater discharge permits for many years as a means of regulating groundwater quality. Per Nevada Revised Statute (NRS) 445A.490, "No permit may be issued which authorizes any discharge or injection of fluids through a well into any waters of the State: ...(3) which would result in the degradation of existing or potential underground sources of drinking water."

Continued monitoring for TPH is required, even if the levels have been non-detect. The proposed permit retains the requirement to sample for TPH (under Outfalls 001 and 002) due to concern of dewatering activities, from the permitted vault areas, potentially containing TPH.

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. There were no limits that were made to be less stringent than the previous permit allowances.

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 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

See the Special Approvals / Conditions Table below:

SA – Special Approvals / Conditions Table

Item #	Description
1	All reports of "Fail" and/or "1" in reference to the parameter "Area inspection visual" shall be accompanied by a narrative report, with photo documentation, of the observations and remedial or mitigation actions carried out by the Permittee, as needed. The narrative report shall be submitted, as an attachment, via NetDMR with the corresponding monthly DMR.
2	For discharges to the Las Vegas Wash and/or its tributaries, all chlorinated discharges shall be sampled for total residual chlorine. A log shall be kept for this discharge type. The log shall include, but is not limited to, the date, time, discharge location, flow rate, and total residual chlorine level prior to discharge. This log shall be submitted with the corresponding DMR, via the NetDMR system, as an attachment.
3	Should the Permittee choose to sample the effluent for the dechlorinating agent, compliance with the total residual chlorine (TRC) limit can be achieved by an equivalent measurement, specifically by sampling for sodium bisulfite (dechlorinating agent). Presence of dechlorination agent, at or above detection levels, is equivalent to the absence of residual chlorine. This special approval, for use of equivalent measurement, is consistent with NAC 445A.250.3(b)(1). Should the Permittee prefer one option for TRC over the other (see Special Approvals/Conditions Item #4), the Division can modify the permit to reflect the option chosen and remove the other option and its associated monitoring requirements from the permit upon the request of the Permittee.
4	Should the Permittee elect to perform a study on the effects of TRC on the receiving water (tributaries to the Las Vegas and the Las Vegas Wash), the Permittee shall submit a study plan to the Division for review and approval. Approval must be obtained prior to commencement of the study. The study shall determine if all designated beneficial uses are protected considering the levels of chlorine potentially discharged by the facility via the facility's ordinary process of disinfection and dechlorination. Based on the findings of the study, a modification may be performed by the Division, at the Division's discretion, to modify the reporting requirements and / or limit for TRC in the permit. In no case shall the TRC limit in the permit be greater than 0.1 mg/L. Should the Permittee prefer one option for TRC over the other (see Special Approvals / Conditions Item #3), the Division can modify the permit to reflect the option chosen and remove the other option and its associated monitoring requirements from the permit upon the request of the Permittee.

Discharges From Future Outfalls/ Planned Facility Changes

There are not any planned future discharges from future outfalls or facility changes.

Corrective Action Sites

There are numerous Bureau of Corrective Action sites throughout the CNLV's system wide discharge areas. Due to the discharges being mostly routed to the local storm drains and storm drain channel systems, it is not anticipated that the discharges will have a negative impact on the remediation sites.

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 to the Division a narrative report describing how the study, on the effects of total residual chlorine in the Las Vegas Wash, will be conducted. This report must be approved by the Division prior to the commencement of the study. The Division has previously determined that using a limit of 0.1 mg/L for total residual chlorine is protective of receiving water beneficial uses and so this limit was included in the previous permit. However, since no technical basis for the 0.1 mg/L value can be presented by the Division, EPA Region 9 will not accept this limit without further study, and, or sampling.	3/1/2027
2	In order to satisfy the antidegradation and antibacksliding requirements, the Division is retaining the existing residual chlorine limit of 0.1 mg/L. However, the Division is requiring the Permittee to submit a study of the effects of residual chlorine on the receiving body of water (Las Vegas Wash) to determine if the limit of 0.1 mg/L is protective of all beneficial uses or if a more restrictive limit should be applied. As a result, the proposed permit includes two options for the Permittee to choose from: The first is to sample the effluent for the dechlorinating agent. Compliance with the total residual chlorine limit can be achieved by sampling for sodium bisulfite. Presence of sodium bisulfite, at or above detection levels, is equivalent to absence of residual chlorine; or, The second option is for the Permittee to conduct a study on the effects of total residual chlorine on the receiving water to determine if all designated beneficial uses are protected considering the levels of chlorine potentially discharged by the facility (see Special Approvals / Conditions Table Items #3 and #4). Either option serves as support for the Permittee's compliance with permit conditions and are consistent with NAC 445A.250.3(b) (1). This approach meets EPA's requirements.	6/1/2027

Deliverable Schedule:

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

Item #	Description	Interval	First Scheduled Due Date
1	Quarterly Reports	Quarterly	1/28/2027
2	Annual Reports	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. **10/19/2026**, 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: **9/11/2026**

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?
Metals (Total Recoverable), Cyanide and Phenols						
Arsenic, Total Recoverable	ug/L	31	2.6	50	Municipal or Domestic	No
Barium, Total Recoverable	ug/L	31	242.9	2,000	Municipal or Domestic	No
Copper, Total Recoverable	ug/L	27	159.1	30	Chronic Aquatic Life	Yes
Lead, Total Recoverable	ug/L	34	1.0	19	Chronic Aquatic Life	No
Mercury, Total Recoverable	ug/L	24	15,823.4	1	Chronic Aquatic Life	Yes
Selenium, Total Recoverable	ug/L	28	4.8	6.3	Chronic Aquatic Life	No
Cyanide	ug/L	21	56.6	5	Chronic Aquatic Life	Yes
Volatile Organic Compounds						
Bromoform	ug/L	128	7.0	No Criteria		No
Chlorodibromomethane	ug/L	94	24.8	No Criteria		No
Chloroform	ug/L	134	40.2	No Criteria		No
Dichlorobromomethane	ug/L	135	30.0	No Criteria		No
Pesticides/PCBs/Dioxins						
Heptachlor Epoxide	ug/L	13	0	0.0038	Chronic Aquatic Life	No
Other Pollutants						
Boron	ug/L	9	410.67	750	Irrigation	No
Chloride	mg/L	141	139.50	No Criteria		No
Fluoride	ug/L	146	936.67	No Criteria		No
Nitrate, Total (as N)	mg/L	54	0.89	90	QC to Protect Beneficial Use	No
Sulfate	mg/L	147	301.73	No Criteria		No