# FACTSHEET
## (pursuant to NAC 445A.236)

**Permittee Name:** THATCHER COMPANY

2302 LARKIN CIRCLE
SPARKS, NV 89431

**Permit Number:** NS0092036

**Permit Type:** GROUNDWATER DISCHARGE

**Designation:** GROUNDWATER

**New/Existing:** EXISTING

**Location:** THATCHER COMPANY OF NEVADA, WASHOE
2302 LARKIN CIRCLE, SPARKS, NV 89431
LATITUDE: 39.523611, LONGITUDE: -119.698611
TOWNSHIP: T19N, RANGE: R20E, SECTION: S11

| Outfall / Well Num | Outfall / Well Name | Location Type | Well Log Num | Latitude | Longitude | Receiving Water |
|---|---|---|---|---|---|---|
| 001 | DUST CONTROL | External Outfall | | 39.540833 | -119.630833 | GROUNDWATER |

### Permit History/Description of Proposed Action
The Permittee, Thatcher Company, has applied for the renewal of groundwater discharge permit NS0092036 for Thatcher Company of Nevada, formerly known as Sierra Chemical Company, located at 2302 Larkin Circle in Sparks, Nevada.

The permit was first issued in June of 1993. The permit was last issued on May 29, 2013, and expired on May 28, 2018; the permit has been administratively continued since.

### Facility Overview
Thatcher Company of Nevada operates as a chemical distribution and manufacturing facility. Bulk chemicals arrive via railcar and truck and are repackaged into smaller packages for resale. Chemicals typically handled by the facility include sodium hydroxide, sulfur dioxide, sulfuric acid, hydrochloric acid, and nitric acid. The facility previously handled gaseous chlorine in addition to the other chemicals listed above; however, that product is filled elsewhere now.

Wastewater is generated during the cleanout of the railcar unloading areas and the rinsing of shipping containers. Wastewater is collected in containment sumps prior to being pumped into empty 350-gallon shipping containers (poly-totes) and then analyzed for pH. The wastewater is then neutralized by blending high pH wastewater with low pH wastewater. Sodium thiosulfate, citric acid, and soda ash may also be used to neutralize the wastewater. After the wastewater has been neutralized, it is transferred to a 4,500-gallon water truck and used for dust control (Outfall 001) at the Kean Canyon site, located one mile north of US I-80, approximately 3.5 miles east-northeast of the Thatcher Company of Nevada.

The facility's Operations and Maintenance (O&M) Manual was last reviewed and approved in 2020. The Technical, Compliance, and Enforcement Branch of the Bureau of Water Pollution Control requires O&M

Manuals be updated every two (2) permit cycles with equates to every ten (10) years. Therefore, unless the Manual needs to be updated due to changes at the facility, the Permittee will not need to submit an updated O&M Manual until 2030.

**Outfall Summary**
Outfall 001 - This external outfall is for the discharge of wastewater, generated during the cleanout of the railcar unloading areas and the rinsing of shipping containers, for dust control at the Kean Canyon site.

**Effluent Characterization**
Nevada State Network Discharge Monitoring Report (NetDMR) data, as reported from January 2020 to August 2024, was reviewed as part of this permit renewal process. The long-term average for the 30-day average discharge flow rate was 185 gallons per day (gpd). The pervious permit's 30-day average discharge limit was 1,000 gpd; there were no exceedances of this limit.

The previous permit required a yearly sample be taken during the 4th quarter for total petroleum hydrocarbons (TPH) and Profile I constituents; however, from January 2020 to August 2024, a sample was not obtained. Although there was no discharge during the 4th quarter of 2020, NetDMR data indicated discharges occurred during the 4th quarter of 2021, 2022, and 2023; the Permittee did not provide an explanation as to why a sample of the discharge was not taken during the aforementioned quarters. The most recent TPH and Profile I sample was taken in 2018. That sample indicated levels for aluminum, arsenic, cadmium, chloride, chromium, iron, lead, manganese, nickel, total dissolved solids, and sulfate were above Profile I’s values; however, limits were not placed in the pervious permit.

The long-term average for the daily maximum total dissolved solids (TDS) concentration from January 2020 to August 2024 was 24,215 mg/L. The minimum pH value reported during the same time period was 6.1 standard units (S.U.) while the maximum pH value was reported as 8.76 S.U.

**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. Data obtained through the NetDMR system indicates that pH, TDS, TPH, and Profile I constituents are pollutants of concern.

**Receiving Water**
Receiving water is groundwater of the State. Groundwater in the area of the discharge is reported to be in excess of 430 feet below ground surface.

**Compliance History**
As previously stated, samples for TPH and Profile I constituents were not obtained during the 4th quarters of 2021, 2022, and 2023. Additionally, from September 2020 to September 2021 samples of the discharge were not obtained due to "turnover at the plant".

**Proposed Effluent Limitations**
The discharge shall be limited and monitored by the Permittee as specified in the following tables:

## NS OTHER - Discharge Limitations Table for Sample Location 001 (Dust Control) To Be Reported Monthly

| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Flow rate | Daily Maximum | <= 4500 Gallons per Day (gal/d) | | Effluent Gross | 001 | Continuous | CALCTD |
| Flow rate | 30 Day Average | M&R Gallons per Day (gal/d) | | Effluent Gross | 001 | Continuous | CALCTD |
| pH, maximum | Daily Maximum | | <= 8.5 Standard Units (SU) | Effluent Gross | 001 | Once Per Batch[1] | DISCRT[2] |
| pH, minimum | Daily Minimum | | >= 6.5 Standard Units (SU) | Effluent Gross | 001 | Once Per Batch[1] | DISCRT[2] |
| Solids, total dissolved | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Once Per Batch[1] | DISCRT |
| Solids, total dissolved | 30 Day Average | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Once Per Batch[1] | DISCRT |
| Number of Events[3] | Event Total | | M&R Number (#) | Effluent Gross | 001 | Monthly | CALCTD |

Notes (NS OTHER - Discharge Limitations Table):

1. Sample and analyze from each 4,500-gallon water truck prior to discharge.
2. Field measurement.
3. The Permittee shall report the number of truckloads of wastewater discharged each month to the Kean Canyon site.

**NS OTHER - Discharge Limitations Table for Sample Location 001 (Dust Control) To Be Reported Quarterly[1][2][3]**

| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Alkalinity, bicarbonate (as CaCO3) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Alkalinity, total (as CaCO3) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Aluminum, total (as Al)[4] | Daily Maximum | | <= 0.2 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Antimony, total (as Sb)[4] | Daily Maximum | | <= 0.006 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Arsenic, total (as As)[4] | Daily Maximum | | <= 0.01 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Barium, total (as Ba)[4] | Daily Maximum | | <= 2 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Beryllium, dissolved (as Be) | Daily Maximum | | <= 0.004 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Cadmium, dissolved (as Cd) | Daily Maximum | | <= 0.005 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Calcium, total (as Ca)[4] | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Chloride (as Cl) | Daily Maximum | | <= 400 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Chromium, total (as Cr)[4] | Daily Maximum | | <= 0.1 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| | | | <= 1 | | | | |

**NS OTHER - Discharge Limitations Table for Sample Location 001 (Dust Control) To Be Reported Quarterly[1][2][3]**

| 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 | 001 | Quarterly | DISCRT |
| Fluoride, total (as F) | Daily Maximum | | <= 4 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Iron, total (as Fe)[4] | Daily Maximum | | <= 0.6 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Lead, dissolved (as Pb) | Daily Maximum | | <= 0.015 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Magnesium, total (as Mg)[4] | Daily Maximum | | <= 150 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Manganese, total (as Mn)[4] | Daily Maximum | | <= 0.1 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Mercury, dissolved (as Hg) | Daily Maximum | | <= 0.002 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Nickel, total (as Ni) | Daily Maximum | | <= 0.1 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Nitrite plus nitrate total 1 det. (as N) | Daily Maximum | | <= 10 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Nitrogen, total | Daily Maximum | | <= 10 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Phosphorus, total (as P) | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| | | | M&R | | | | |

**NS OTHER - Discharge Limitations Table for Sample Location 001 (Dust Control) To Be Reported Quarterly[1][2][3]**

| Discharge Limitations | | | | Monitoring Requirements | | | |
|---|---|---|---|---|---|---|---|
| **Parameter** | **Base** | **Quantity** | **Concentration** | **Monitoring Loc** | **Sample Loc** | **Measurement Frequency** | **Sample Type** |
| Potassium, total (as K)[4] | Daily Maximum | | Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Selenium, dissolved [as Se] | Daily Maximum | | <= 0.05 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Silver, total (as Ag) [4] | Daily Maximum | | <= 0.1 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Sodium, total (as Na)[4] | Daily Maximum | | M&R Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Sulfate, total (as SO4) | Daily Maximum | | <= 500 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Thallium, total (as Tl)[4] | Daily Maximum | | <= 0.002 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Zinc, dissolved (as Zn) | Daily Maximum | | <= 5 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |
| Hydrocarbons, total petroleum | Daily Maximum | | <= 1 Milligrams per Liter (mg/L) | Effluent Gross | 001 | Quarterly | DISCRT |

Notes (NS OTHER - Discharge Limitations Table):

1. TPH and Profile I (excluding cyanide, pH, and TDS).
2. Sample and analyze, once every three months, from the 4,500-gallon water truck prior to discharge.
3. If no discharge occurs during the quarter, it shall be noted in NetDMR with NODI Code 'C'. Furthermore, sampling will not be required if no discharges occur during the quarter.
4. Analysis is for the dissolved fraction.

**Summary of Changes From Previous Permit**

The outfall name for Outfall 001 has been changed to Dust Control.

The 30-day average flow limit of 1,000 gpd has been changed to monitor and report.

A daily maximum flow limit of 4,500 gpd has been added.

The requirement to sample for Profile I constituents during the 4th quarter has been changed to once a quarter.

The requirement to sample for TDS each year has been removed as this constituent is sampled for once per batch.

Limits for Profile I (excluding TDS) have been included in this permit renewal.

The maximum pH limit has been changed from 9.0 S.U. to 8.5 S.U.

The minimum pH limit has been changed from 6.0 S.U. to 6.5 S.U.

**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**
The 30-day average flow rate has been changed from 1,000 gpd to monitor and report and a daily maximum flow rate of 4,500 gpd has been added. These changes have been made in order to obtain a better representation of the facility's operations.

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 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 constituents listed in Profile I 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." Therefore, the requirement to sample for Profile I (excluding cyanide) is included to assess the quality of the discharged wastewater and to ensure groundwater is not being degraded. During the review of the DMR data it was noted that almost half of the Profile I constituents were reported above the values. It is for this reason that sampling of Profile I (excluding cyanide, TDS, and pH) has been changed from yearly to once a quarter. TDS and pH are to be sampled for once per batch. Furthermore, Profile I values (excluding TDS) have been implemented.

The maximum pH limit of 9.0 S.U. and the minimum pH limit of 6.0 S.U. has been changed to 8.5 S.U. and 6.5 S.U., respectively. The previous pH limits were from EPA's secondary treatment standards which are applicable to publicly owned treatment works (POTWs). As this facility is not a POTW the pH limits have been set to the Profile I values.

**Anti-backsliding**
To prevent backsliding, effluent limitations in reissued permits are required to be as stringent as those in the previous permit with some exceptions.

The previous permit included a 30-day average discharge flow limit of 1,000 gpd. The proposed permit replaces the 30-day average flow limit of 1,000 gpd with a requirement to monitor and report. The proposed permit also replaces the requirement to monitor and report the daily maximum flow rate with a daily maximum flow limit of 4,500 gpd. The flow is based on the capacity of the water truck used for dust suppression. Furthermore, the Division's fees are based on a daily maximum flow rate and not on the 30-day average flow rate.

**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 waters.

As this permit is for discharges to groundwater, and not surface water, the new antidegradation rule is not applicable. There are currently no specific water quality standards that have been formally adopted by the State for groundwater, however, data reviewed during the renewal process does not indicate the potential for degradation of the groundwater from the reclaimed water discharged within the compliance limits of the proposed permit.

**Special Conditions**
See Item #1 of the Special Approvals / Conditions Table.

SA – Special Approvals / Conditions Table

| Item # | Description |
|---|---|
| 1 | No surface ponding or runoff of neutralized water is allowed. Water shall not be discharged at the Kean Canyon site when the ground is wet, frozen, or covered with snow. |

**Discharges From Future Outfalls/ Planned Facility Changes**
The Permittee does not anticipate discharges from future outfalls or any changes to the facility.

**Corrective Action Sites**
There are no active Bureau of Corrective Action sites located within a one-mile radius of the Kean Canyon discharge location.

**Wellhead Protection Program**
The nearest public water system (PWS) wells are located approximately 1.5 miles, 1.6 miles, 1.8 miles, and 2.0 miles south and southeast of the Kean Canyon discharge location. There are more PWS wells located to the north, east, and west of the discharge location all of which are more than 5 miles away. The local groundwater flow direction is to the southeast toward the Truckee River. The discharge location is not located in a Wellhead Protection Area, which represents an approximate 10-year capture zone of a well. Furthermore, the discharge location is not located within a Drinking Water Protection Area, which is defined by a 3,000-foot radius around a PWS well. The permitted discharge is not anticipated to affect the PWS wells due to the distances to the wells and the groundwater flow direction.

**Schedule of Compliance:**

SOC – Schedule of Compliance Table

| There are no Schedule of Compliance items |
|---|

**Deliverable Schedule:**

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

| Item # | Description | Interval | First Scheduled Due Date |
|---|---|---|---|
| 1 | Quarterly Discharge Monitoring Reports | Quarterly | 7/28/2025 |

**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. **5/23/2025,** 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: **Bonnie Hartley**
Date: **4/22/2025**
Title: **Staff II, Associate Engineer**