

FACTSHEET
(pursuant to NAC 445A.236)

Permittee Name: TRI GENERAL IMPROVEMENT DISTRICT

440 USA PARKWAY, SUITE 105
MCCARRAN, NV 89437

Permit Number: NS2026513

Permit Type: GROUNDWATER DISCHARGE

Designation: GROUNDWATER

New/Existing: NEW

Location: ADVANCED WATER TREATMENT FACILITY, STOREY
3405 USA PARKWAY, MCCARRAN, NV 89437
LATITUDE: 39.520180, LONGITUDE: -119.472699
TOWNSHIP: T19N, RANGE: R22E, SECTION: S11N

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Latitude	Longitude	Receiving Water
002	MISC DISCHARGES TO TRI GID'S RESERVOIR	External Outfall		39.545070	-119.4512	TRI GID'S RESERVOIR
003	TRACT SV	External Outfall		39.472650	-119.394950	N/A
004	LDG	External Outfall		39.500790	-119.427110	N/A
005	GOOGLE	External Outfall		39.4997	-119.427870	N/A
006	REDWOOD	External Outfall		39.498540	-119.444404	N/A
007	BLOCKCHAINS	External Outfall		39.513710	-119.441740	N/A
008	SWITCH (NS2024517)	External Outfall		39.516130	-119.478570	N/A
009	BIGHORN	External Outfall		39.521670	-119.485010	N/A
010	GAS POWER GENERATION	External Outfall		39.527380	-119.484017	N/A
011	TESLA (NS2020502)	External Outfall		39.531057	-119.433994	N/A
012	PERU SHELF	External Outfall		39.531340	-119.493760	N/A
013	PERU RIDGE	External Outfall		39.534010	-119.494150	N/A
014	JAMES HARDIE (NS2011501)	External Outfall		39.554590	-119.499880	N/A
015	NANAWA	External Outfall		39.556920	-119.515540	N/A
01A	TREATED EFFLUENT FROM TRI GID'S RESERVOIR	Internal Outfall		39.520160	-119.472920	N/A

02A	COOLING SYSTEM BLOWDOWN FROM NEARBY FACILITIES	Internal Outfall		39.520160	-119.472920	N/A
03A	SUM OF WASTEWATER (OUTFALL 01A + 02A) RECEIVED BY THE AWTF	Internal Outfall		39.520160	-119.472920	N/A
SUM	SUM OF RECLAIMED WATER DISCHARGED FROM THE AWTF (OUTFALLS 002 - 015)	Sum		39.545070	-119.4512	N/A

Permit History/Description of Proposed Action

The Permittee, Tahoe Reno Industrial (TRI) General Improvement District (GID), has applied for a new groundwater discharge permit, NS2026513, for the use of reclaimed water, supplied by TRI GID's reservoir, at a proposed Advanced Water Treatment Facility (AWTF) to be located at 3405 USA Parkway in McCarran, Storey County, Nevada.

Facility Overview

TRI GID owns and operates a single, 60-mil high density polyethylene (HDPE), lined reservoir with a storage capacity of 2,000 acre-feet. Water held in the reservoir is a mix of treated effluent from TRI GID's wastewater treatment plant (WWTP), Category B bacteriological quality, per Nevada Administrative Code (NAC) 445A.276, reclaimed water from the Truckee Meadows Water Reclamation Facility (TMWRF), stormwater, and permitted discharges of cooling tower blowdown. Also located at the reservoir are monitoring wells that act as a leak detection system. TRI GID's WWTP, reservoir, and the monitoring wells, are covered under groundwater discharge permit (NS2000502). Water from the reservoir is used for cooling systems at facilities located within the TRI Center. Due to the internal recycling of the water (e.g., water sent from the reservoir to facilities for cooling then the cooling systems sending the blowdown back to the reservoir), silica and other salts accumulate in the reservoir water. Silica can create operational challenges in cooling systems by contributing to scale formation which can support microbial growth that can exacerbate corrosion and reduce heat transfer. To reduce the silica and salt content in the reservoir, and to provide ideal water quality for use in cooling systems, the AWTF was proposed.

The AWTF will include two separate treatment systems (see attached process diagram). The first system will partially treat potable water with reverse osmosis (RO) while the other portion of the potable water will bypass RO treatment and will blend with the RO treated potable water downstream creating a blend ratio that will meet the optimal water goals needed for cooling systems.

The second treatment system will treat a blend of the RO concentrate from the first system, cooling system blowdown from nearby facilities, internal process recycle streams from the AWTF, and reclaimed water from TRI GID's reservoir. Treatment will consist of Cold Lime Softening, ultrafiltration, weak acid cation ion exchange, and high pH reverse osmosis (HPRO). The process will concentrate salts and silica to the greatest extent possible prior to the stream entering the thermal evaporation system. The thermal system uses a two-step process where brine is concentrated and crystalized into a solid dry salt which is trucked off-site for disposal at a nearby landfill.

The process described above will create a zero liquid discharge whereby the treated water from the AWTF will be sent to users and the blowdown from the users will be sent to the AWTF creating a loop. More than 97 percent of the process water sent to the AWTF will be reclaimed; the remainder, 3 percent, will be comprised of moisture that remains in solids removed from the thermal system and trace amounts of evaporated water the process is unable to re-capture for recycling through the facility.

The AWTF may, at times, discharge treated process water or potable water to TRI GID's reservoir. Discharges from the AWTF to the reservoir are expected to occur during commissioning of the facility and during any emergency shut-down situations. Furthermore, discharges to the reservoir may occur should the AWTF produce more treated water than can be used by its customers or if the off-site or on-site storage tanks are full or overflow.

Outfall Summary

Outfall 01A – This outfall is for the AWTF to receive reclaimed water from TRI GID's reservoir.

Outfall 02A – This outfall is for the AWTF to receive cooling tower blowdown from nearby facilities.

Outfall 03A – This outfall is for the summation of flows from Outfalls 01A + 02A.

Outfall 002 – This outfall is for any discharges from the AWTF to TRI GID's reservoir (NS2000502).

Outfall 003 – This outfall is for discharges from the AWTF to the Tract SV.

Outfall 004 - This outfall is for discharges from the AWTF to LDG.

Outfall 005 - This outfall is for discharges from the AWTF to Google.

Outfall 006 - This outfall is for discharges from the AWTF to Redwood.

Outfall 007 - This outfall is for discharges from the AWTF to Blockchains.

Outfall 008 - This outfall is for discharges from the AWTF to Switch (NS2024517).

Outfall 009 - This outfall is for discharges from the AWTF to Bighorn.

Outfall 010 - This outfall is for discharges from the AWTF to Gas Power Generation.

Outfall 011 - This outfall is for discharges from the AWTF to Tesla (NS2020502).

Outfall 012 - This outfall is for discharges from the AWTF to Peru Shelf.

Outfall 013 - This outfall is for discharges from the AWTF to Peru Ridge.

Outfall 014 - This outfall is for discharges from the AWTF to James Hardie (NS2011501).

Outfall 015 - This outfall is for discharges from the AWTF to Nanawa.

Outfall SUM – This outfall is for the summation of discharges from the AWTF (Outfall 002 through Outfall 015).

Effluent Characterization

Reclaimed water from TRI GID's reservoir will be supplied to the AWTF. Additional source water streams include potable groundwater from TRI GID's distribution system and cooling system blowdown from nearby facilities. The reclaimed water from TRI GID meets Category B bacteriological quality per NAC 445A.276.

As the proposed AWTF has not been constructed yet, a characterization of the treated water is not currently available. However, the Permittee proposes that the AWTF will be able to treat the water to Category A bacteriological quality (NAC 445A.276).

Pollutants of Concern

Pollutants of concern are any pollutant, or parameter, that are believed to be present in the discharge and could affect or alter the physical, chemical, or biological conditions of the receiving water. As the treated water will only be used for cooling systems, the only pollutant of concern at this time is fecal coliform.

Receiving Water

Any miscellaneous discharges from the AWTF will be directed into TRI GID's lined reservoir.

Compliance History

As this is a new permit, there is no compliance history to report.

Proposed Effluent Limitations

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

WWTP Discharge Limitations Table for Sample Location 002 (Misc Discharges To Tri Gid's Reservoir) 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	Daily When Discharging	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Effluent Gross	002	Daily When Discharging	METER

Notes (WWTP Discharge Limitations Table):

1. Flow reported for this table is for discharges from the AWTF to TRI GID's reservoir.

Re-use Discharge Limitations Table for Sample Location 003 (Tract Sv) 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)		Prior to Reuse	003	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	003	Continuous	METER

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this table is for discharges from the AWTF to Tract SV.

Re-use Discharge Limitations Table for Sample Location 004 (Ldg) 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)		Prior to Reuse	004	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	004	Continuous	METER

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this outfall is for discharges from the AWTF to LDG.

Re-use Discharge Limitations Table for Sample Location 005 (Google) 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)		Prior to Reuse	005	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	005	Continuous	METER

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this table is for discharges from the AWTF to Google.

Re-use Discharge Limitations Table for Sample Location 006 (Redwood) 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)		Prior to Reuse	006	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	006	Continuous	METER

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this table is for discharges from the AWTF to Redwood.

Re-use Discharge Limitations Table for Sample Location 007 (Blockchains) 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)		Prior to Reuse	007	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	007	Continuous	METER

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this table is for discharges from the AWTF to Blockchains.

Re-use Discharge Limitations Table for Sample Location 008 (Switch) 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)		Prior to Reuse	008	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	008	Continuous	METER

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this table is for discharges from the AWTF to Switch.

Re-use Discharge Limitations Table for Sample Location 009 (Bighorn) 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)		Prior to Reuse	009	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	009	Continuous	METER

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this table is for discharges from the AWTF to Bighorn.

Re-use Discharge Limitations Table for Sample Location 010 (Gas Power Generation) 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)		Prior to Reuse	010	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	010	Continuous	METER

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this table is for discharges from the AWTF to Gas Power Generation.

Re-use Discharge Limitations Table for Sample Location 011 (Tesla) 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)		Prior to Reuse	011	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	011	Continuous	METER

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this table is for discharges from the AWTF to Tesla.

Re-use Discharge Limitations Table for Sample Location 012 (Peru Shelf) 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)		Prior to Reuse	012	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	012	Continuous	METER

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this table is for discharges from the AWTF to Peru Shelf.

Re-use Discharge Limitations Table for Sample Location 013 (Peru Ridge) 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)		Prior to Reuse	013	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	013	Continuous	METER

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this table is for discharges from the AWTF to Peru Ridge.

Re-use Discharge Limitations Table for Sample Location 014 (James Hardie) 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)		Prior to Reuse	014	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	014	Continuous	METER

Notes (Re-use Discharge Limitations Table):

- Flow reported for this table is for discharges from the AWTF to James Hardie.

Re-use Discharge Limitations Table for Sample Location 015 (Nanawa) 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)		Prior to Reuse	015	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	015	Continuous	METER

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this table is for discharges from the AWTF to Nanawa.

Re-use Discharge Limitations Table for Sample Location Sum (Sum Of Discharges From The Awtf (Outfalls 002 - 015)) 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)		Prior to Reuse	SUM	Continuous	CALCTD
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Prior to Reuse	SUM	Continuous	CALCTD
Coliform, fecal general	Daily Maximum		<= 23 Most Probable Number per 100ml T (MPN/100mL) ^[2]	Prior to Reuse ^[3]	SUM	Weekly	DISCRT
Coliform, fecal general	30 Day Geometric Mean		<= 2.2 Most Probable Number per 100ml T (MPN/100mL) ^[2]	Prior to Reuse ^[3]	SUM	Weekly	DISCRT

Notes (Re-use Discharge Limitations Table):

1. Flow reported for this table is for the summation of discharges from the AWTF to nearby facilities (Outfalls 002 - 015).
2. MPN / 100 mL or CFU / 100 mL.
3. Samples shall be obtained after treatment from the AWTF but prior to discharge to nearby facilities.

**NS OTHER - Discharge Limitations Table for Sample Location 01A (Treated Effluent From Tri
Gid's Reservoir) 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)		Internal Monitoring Point	01A	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Internal Monitoring Point	01A	Continuous	METER
Coliform, fecal general	Daily Maximum		<= 23 Most Probable Number per 100ml T (MPN/100mL) ^[2]	Internal Monitoring Point ^[3]	01A	Weekly	DISCRT
Coliform, fecal general	30 Day Geometric Mean		<= 2.2 Most Probable Number per 100ml T (MPN/100mL) ^[2]	Internal Monitoring Point ^[3]	01A	Weekly	DISCRT

Notes (NS OTHER - Discharge Limitations Table):

1. Flows reported for this outfall are for treated effluent received from TRI GID's reservoir.
2. MPN / 100 mL or CFU / 100 mL.
3. Samples shall be obtained after the treated effluent leaves TRI GID's reservoir but prior to the treated effluent entering the AWTF.

NS OTHER - Discharge Limitations Table for Sample Location 02A (Cooling System Blowdown From Nearby Facilities) 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)		Internal Monitoring Point	02A	Continuous	METER
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Internal Monitoring Point	02A	Continuous	METER

Notes (NS OTHER - Discharge Limitations Table):

1. Flow reported for this table is for discharges of cooling tower blowdown to the AWTF.

NS OTHER - Discharge Limitations Table for Sample Location 03A (Sum Of Wastewater (Outfall 01A + 02A) Received By The Awtf) 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	<= 1.81 Million Gallons per Day (Mgal/d)		Internal Monitoring Point	03A	Continuous	CALCTD
Flow rate	30 Day Average	<= 1.46 Million Gallons per Day (Mgal/d)		Internal Monitoring Point	03A	Continuous	CALCTD

Notes (NS OTHER - Discharge Limitations Table):

1. Flow reported for this table is the summation of flows from Outfalls 01A + 02A.

Summary of Changes From Previous Permit

As this is a new permit, there is no summary of changes to report.

Technology Based Effluent Limitations

For industrial (and other non-municipal) facilities, technology-based effluent limitations (TBELs) require a minimum level of treatment of pollutants for point source discharges based on available treatment technologies, while allowing the discharger to use any available control technique to meet the limits. TBELs are derived by national effluent limitation guidelines (ELGs) and standards established by the United States Environmental Protection Agency (EPA), and / or using one's best professional judgement (BPJ) on a case-by-case basis in the absence of national guidelines and standards. Because there are currently no ELGs for advanced water treatment systems, there are no TBELs to incorporate into the proposed permit.

Water Quality Based Effluent Limitations

Although there are no numerical water quality based effluent limitations associated with the proposed permit, the reservoir is considered a surface water per NAC 445A.2268 which states, ""Surface Water" means all water open to the atmosphere and subject to surface runoff." Therefore, NAC 445A.121, narrative standards applicable to all surface waters apply.

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

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

Basis for Effluent Limitations

Although the Permittee proposes to produce Category A bacteriological quality reclaimed water for use in cooling systems, NAC 445A.2764 requires, at a minimum, Category B bacteriological quality reclaimed water for the use as cooling water in an industrial process. Therefore, the proposed permit establishes the requirement to sample for fecal coliform to assess the quality of reclaimed water being supplied for the protection of human health.

The Permittee has requested a daily maximum influent non-potable flow rate of 1.81 million gallons per day (MGD) and a 30-day average flow rate of 1.46 MGD.

The proposed permit establishes the requirement to report the flow of treated water supplied to each reuse site.

Anti-backsliding

To prevent backsliding, effluent limitations in re-issued permits are required to be as stringent as those in the previous permit. As this is a new permit, anti-backsliding requirements are not applicable.

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 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. 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.

As mentioned above, TRI GID's reservoir is considered a surface water per NAC 445A.2268 and as this permit is for a new point source discharge (i.e., miscellaneous discharges from the AWTF to the reservoir) an antidegradation review is required. However, the reservoir is not a designated water (i.e., there are no designated beneficial uses) and it is not a tributary to a designated water; therefore, there are no applicable numeric water quality standards. With the TRI GID's reservoir having no designated water and not being a tributary to a designated water, the Division has determined that the antidegradation regulation has been met.

Special Conditions

See the Special Approvals / Conditions Table below.

SA – Special Approvals / Conditions Table

Item #	Description
1	The Permittee may apply for a permit modification to incorporate additional reclaimed water use sites.
2	The Permittee may provide reclaimed water to users listed in this permit only after the user obtains a permit from the Division authorizing the use of the reclaimed water.

Discharges From Future Outfalls/ Planned Facility Changes

Once the facility is constructed and online, the Permittee does not anticipate discharges from future outfalls or any planned facility changes.

Per Special Approvals / Conditions Item #1, the Permittee may request to add new reuse sites via a modification to the permit.

Corrective Action Sites

There are no Bureau of Corrective Actions (BCA) sites located within a one-mile radius of the proposed facility.

Wellhead Protection Program

The nearest Public Water Supply (PWS) well is located approximately 720 feet to the west with several more located west, north, and east of the proposed facility. The proposed facility is set to be constructed within a Drinking Water Protection Area, which is defined by a 3,000-foot radius around a PWS well. Furthermore, there are no Wellhead Protection Areas, which represent an approximate 10-year capture zone of a well, in the vicinity of the proposed facility. Activities conducted at the proposed facility are not anticipated to affect any PWS wells due to the confined nature of the facility.

Schedule of Compliance:

SOC – Schedule of Compliance Table

Item #	Description	Due Date
1	All Discharge Monitoring Reports (DMRs) shall be submitted electronically through the Nevada NetDMR website https://netdmr.ndep.nv.gov/netdmr/public/home.htm .	1/28/2027
2	Within 90 days of the AWTF start-up period, the Permittee shall submit to the Division, for review and approval, two (2) copies (one (1) electronic and one (1) hard copy) of an Operation and Maintenance (O&M) Manual. The O&M Manual shall be prepared in accordance with WTS-2: <i>Minimum Information Required for an Operation and Maintenance Manual</i> . Additionally, the O&M Manual shall be wet-stamped and prepared by a Nevada registered Professional Engineer.	9/1/2031
3	Within 90 days of the AWTF start-up period, the Permittee shall submit to the Division, for review and approval, two (2) copies (one (1) electronic and one (1) hard copy) of a Reclaimed Water Management Plan (RWMP). The RWMP shall be prepared in accordance with WTS-B: <i>General Criteria for Preparing a Reclaimed Water Management Plan</i> . Furthermore, the RWMP shall be wet-stamped and prepared by a Nevada registered Professional Engineer.	9/1/2031

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 Report (See section C.1.2. of the Permit)	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. **9/18/2026**, 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: **Bonnie Hartley**

Date: **8/7/2026**

Title: **Staff II, Associate Engineer**

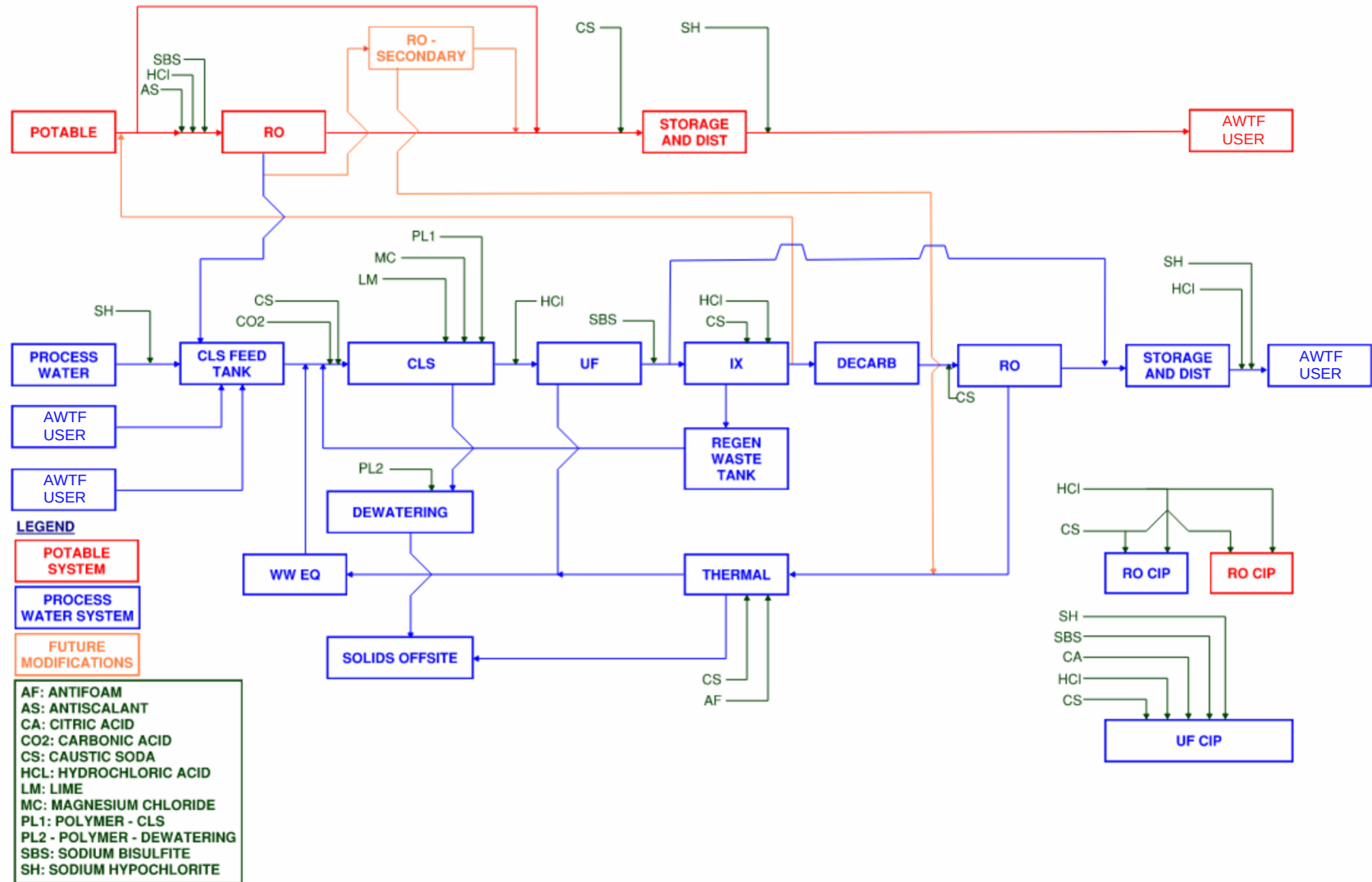


Figure 4-A Proposed AWTF Process Diagram