Message

From: Sharada Maligireddy [smaligireddy@ndep.nv.gov]
Sent: 5/10/2017 3:23:32 PM
To: Whitson, Amelia [Whitson.Amelia@epa.gov]
Subject: RE: Current & Revised Version: NV0024228 - For your Review
Attachments: DOC088.pdf; DOC105.pdf

Yes please.

Meanwhile, please see the maps. The approved monitoring point is beyond the yellow line you see in the second attachment. Yellow is for NAC445A.2158. But I do agree for other constituents for which mass-balance calculations are not applied, 2156 still applies. But none that are in the range that needs to be monitored (is what I thought), but I can include them in the end of the pipe limit set.

Also after seeing the file today, realized not all the changes had been saved. Not an excuse, but that day I spent more time retyping every time system doesn't save or act up on me, and missed to see not every section is the way it supposed to be, by the time I was done and shared the file with you. My apologies for that. I will include the inorganic nitrogen explanation etc,. too now.

sharada

-----Original Message-----
From: Whitson, Amelia [mailto:Whitson.Amelia@epa.gov]
Sent: Wednesday, May 10, 2017 8:13 AM
To: Sharada Maligireddy <smaligireddy@ndep.nv.gov>
Subject: RE: Current & Revised Version: NV0024228 - For your Review

Are you free at 9am today?

-----Original Message-----
From: Sharada Maligireddy [mailto:smaligireddy@ndep.nv.gov]
Sent: Tuesday, May 9, 2017 10:06 PM
To: Whitson, Amelia <Whitson.Amelia@epa.gov>
Subject: RE: Current & Revised Version: NV0024228 - For your Review

Call.sounds good for tomorrow.
Please let me.know when would be a good time.
I need some time to go through the permit.again and I.should.be good from 8 on.

Thanks

_____
From: Whitson, Amelia [Whitson.Amelia@epa.gov]
Sent: Tuesday, May 9, 2017 5:21 PM
To: Sharada Maligireddy
Cc: Nicholas Brothers
Subject: RE: Current & Revised Version: NV0024228 - For your Review

Hi Sharada,

My main point was that the permit and fact sheet need to be specific about the mixing zone approval (not just so that I know, but so that anyone reading the permit/fact sheet would understand and so that the permit is clear about exactly how and where the adjusted standards and monitoring points apply). So, yes, the permit and fact sheet need to include all the information requested in my original comment #1 below, including an explanation that the mixing zone meets the requirements under NAC445A.295-302.

Did the mixing zone cover all pollutants? If not, then standards under 2156 would still apply. Also, if this is exactly the same mixing zone as for the other NERT permit, then I'm even more confused, as I believe that permit used the standards under 2156.

I didn't see any language in the fact sheet stating what you've summarized below about inorganic nitrogen. If there's no reasonable potential to exceed what would be the adjusted end-of-pipe limits based on the mixing zone study, then you should include that justification in the fact sheet (i.e. something along the lines of what you included in the fact sheet for why TDS didn't have an end-of-pipe limit).

As we'd discussed previously, you don't need to send me the mixing zone application right now, but you do need to state exactly how the approved mixing zone is being implemented in the permit and fact sheet so that it's a clear and enforceable term of the permit, and clarify in the fact sheet that it meets all applicable requirements (as discussed in the first paragraph above).

I didn't see any language in the fact sheet stating what you've summarized below about TMDL applicability. Furthermore, I'm not sure I understand based on your summary below how this is consistent with the TMDL. The TMDL definitely applies to discharges into the Las Vegas Wash, although the TMDL clarifies that some "de minimis" dischargers that are below a certain rate of ammonia and phosphorus discharge do not need effluent limits in order to be consistent with the assumptions and requirements of the TMDL. I'd be happy to discuss further with you at your convenience, so feel free to email or call me back if you'd like to talk further about any of these points.

Many thanks,

Amelia Whitson
NPDES Permits Office (WTR-2-3)
US EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3216

From: Sharada Maligireddy [mailto:smaligireddy@ndep.nv.gov]
Sent: Tuesday, May 9, 2017 3:27 PM
To: Whitson, Amelia <Whitson.Amelia@epa.gov>
Cc: Nicholas Brothers <nbrothers@ndep.nv.gov>
Subject: RE: Current & Revised Version: NV0024228 - For your Review

Amelia,

I thought I mentioned tracer study done. All the NV permits with outfalls discharging within few feet of each other have been using the same study as basis and the same monitoring point. My review involved all those studies wrt to current discharge. Did you mean to cite the explicitly regs. (NAC445A.295-302) which were the basis for the review of both the mixing-zone boundary and the mixing-zone calculations?

For the 2158 question: Yes, the discharge is under 2156 (very close to the end of the stretch covered by 2156), but the end of the mixing zone comes under 2158, so they have to be responsible for the water quality standards at the end/boundary of the mixing zone only (and this discharge continues to not pose any threat to the environment in any way/satisfy all the 295-302)

The data doesn't show any significant Inorganic Nitrogen. Plus the system will actually remove some of Nitrates (as explained in the rationale), so I do not have a reason/ need to monitor inorganic nitrogen at the end of the pipe. However, since they are responsible for maintaining the RMHQ at the end of the mixing zone, it was included in that table.

Just like the other NERT permit, mentioning the (reviewed & approved by me/us) mixing zone calculations and the mixing zone stretch/identification would suffice. All the other dischargers go by the same tracer study basis with same LW5.5 as ambient water quality monitoring point too. But I can share the files if you need me to.

The make up of the influent is the reason this discharge is not considered a new point source. I did double check with BISC who has been studying the plume and in that process have reasonable/defensible estimation on the influent makeup. That's what I mentioned as the reason why TMDLs won't apply.

Let me know how to proceed on these.

Thanks

sharada

From: Whitson, Amelia [mailto:Whitson.Amelia@epa.gov]
Sent: Tuesday, May 09, 2017 12:18 PM
To: Sharada Maligireddy <smaligireddy@ndep.nv.gov<mailto:smaligireddy@ndep.nv.gov>>
Subject: RE: Current & Revised Version: NV0024228 - For your Review

Hi Sharada,

Thank you for sharing the draft permit. Here are my comments and questions:

1. Neither the permit nor the fact sheet appear to specify how large the approved mixing zone is, and they also do not explain whether/how the mixing zone meets the requirements under NAC 445A.295-302. The permit and/or fact sheet (as applicable) need to specify (1) how large the mixing zone is (or you can attach the approved mixing zone application to the permit), (2) where specifically the monitoring for Outfall 004 will need to be done, and (3) whether/how the mixing zone meets all requirements under NAC 445A.295-302.

2. Page 2 of the fact sheet says the receiving water is Las Vegas Wash at Telephone Line Road - if this is the case, why don't the water quality standards under NAC 445A.2156 apply, instead of those at NAC 445A.2158?

3. Why are there no end-of-pipe limits for inorganic nitrogen? Please add an explanation in the fact sheet.

4. Need to justify why there are no limits for ammonia or phosphorus consistent with the TMDL for these parameters.

I'd be more than happy to discuss these comments further with you if you'd like. Please don't hesitate to call or email if you have any questions.

Best,

Amelia Whitson
NPDES Permits Office (WTR-2-3)
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75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3216

From: Sharada Maligireddy [mailto:smaligireddy@ndep.nv.gov]
Sent: Friday, May 5, 2017 11:29 AM
To: Whitson, Amelia <Whitson.Amelia@epa.gov<mailto:Whitson.Amelia@epa.gov>>
Subject: Current & Revised Version: NV0024228 - For your Review

Amelia,

Please find attached the draft 1 documents for review for the NERT site to treat the influent from the dewatering activities associated with the upcoming Weir Construction Project.

I recently issued an individual permit (NS2017509) to cover for SNWA's working in the waters (based on project duration we had them apply for the individual permit vs. temporary permit) for the construction activities referenced in the NV permit. The Permittee requested an expedited process for this NPDES permit in view of the need for them to start the construction/installation for the treatment project, to be ready to receive the influent as soon as the weir construction commences.

Please give me a heads-up if you ever need to reach me after 3:30, so I can arrange for staying back at the office after my normal work schedule (7:00 to 3:30).

Thanks & regards

[http://intranet/graphic_p/logo_new15_print_s.jpg]

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