FACTSHEET
(pursuant to NAC 445A.236)

Permittee Name: CLARK COUNTY DEPARTMENT OF PARKS AND RECREATION

2601 E. SUNSET RD.
LAS VEGAS, NV 89120

Permit Number: NS2003504

Permit Type: GROUNDWATER DISCHARGE

Designation: GROUNDWATER

New/Existing: EXISTING

Location: CLARK COUNTY WETLANDS PARK NATURE PRESERVE, CLARK
7050 WETLANDS PARK LANE, LAS VEGAS, NV 89122
LATITUDE: 36.100305, LONGITUDE: -115.021818
TOWNSHIP: 21 S, RANGE: 62 E, SECTION: 23, 24 & 26

Outfall / Well Num	Outfall / Well Name	Location Type	Well Log Num	Latitude	Longitude	Receiving Water
001	DIVERSION OF RECLAIMED WATER FROM CCWRD	External Outfall		36.111417	-115.032255	GROUNDWATER
002	MONITORING SITE NP-8 (BEAVER BRIDGE)	External Outfall		36.100630	-115.019396	GROUNDWATER
003	MONITORING SITE DU-1 (POND #7)	External Outfall		36.092250	-115.014483	GROUNDWATER

Permit History/Description of Proposed Action
The Permittee, Clark County Department of Parks and Recreation, has applied for the renewal of permit NS2003504 for the Clark County Wetlands Park Nature Preserve (Preserve), located at 7050 East Tropicana Avenue, in Las Vegas, within Clark County, Nevada. The Permittee proposes to continue to use reclaimed water for wetland enhancements and irrigation of upland areas in the Preserve.

This permit was first issued on September 3, 2003. The most recent permit was issued on September 1, 2014, and expired on August 31, 2019; the permit has been administratively continued since.

Facility Overview
The Preserve utilizes reclaimed water supplied by the Clark County Water Reclamation District's Flamingo Water Resource Center (FWRC), which operates under permit NS2018508.

The Preserve is located within the extreme eastern portion of the Las Vegas Valley, along the Las Vegas Wash, near Tropicana Avenue and Broadbent Boulevard. The reuse sites that fall within the park's boundary, are the Nature Preserve West and Duck Creek Trailhead, for a total of 210 acres.

The reclaimed water is delivered from the FWRC through a pipeline, into a riprap lined mixing basin at the north end of the Preserve where it then flows into the wetland system, via gravity flow, through a system of ponds and channels within the park's boundary to the various wetland and upland areas.

The site's Reclaimed Water Management Plan (RWMP) (formerly known as an Effluent Management

Plan) was last reviewed and approved by the Division on January 21, 2015. The Technical, Compliance, and Enforcement (TCE) Branch of the Bureau of Water Pollution Control requires RWMPs be updated every two (2) permit cycles which equates to every ten (10) years. with a revised plan is due within three months from the permit's issuance date.

Outfall Summary
Outfall 001 – This external outfall is for the discharge of reclaimed water from the CCWRD FWRC.

Outfall 002 – This external outfall is for the reclaimed water passing Beaver Bridge, being Monitoring Site NP-8.

Outfall 003 – This external outfall is for the reclaimed water entering Pond #7, being Monitoring Site DU-1.

Effluent Characterization
Nevada State Network Discharge Monitoring Report (NetDMR) data, as reported from the years July 2019 to June 2024, was reviewed as part of this permit renewal process. The long-term average discharge flow rate for Outfall 001 was 2.46 million gallons per day (MGD). The daily maximum discharge flow rate for Outfall 001 is limited to 5.0 MGD, with the pending renewal application requesting 6.0 MGD. There were no reported exceedances for this limit.

The CCWRD FWRC provides tertiary treated and disinfected reclaimed water which meets Category B bacteriological quality per Nevada Administrative Code (NAC) 445A.276 to the Preserve; therefore, the reclaimed water should meet, at a minimum, a maximum 30-day geometric mean for fecal coliform of 2.2 colony forming units (CFU) / 100 mL and a maximum daily number of 23 CFU / 100 mL. The long-term average for the daily maximum fecal coliform reported was 13 CFU / 100 mL.

Outfall 001:
Flow: 2.8 Mgal/d
Chloride: 229 mg/L
Fecal Coliform (30-day geometric mean): 1.4 Most Probable Number per 100mL
Nitrogen, nitrate total (mg/L): 16 mg/L
Sulfate: 331 mg/L
Total Dissolved Solids (TDS): 1080 mg/L

*Note on the proposed permit, "Nitrogen, nitrate total" parameter shall be updated to "Nitrogen, total" to be consistent with Division reporting parameters.

Pollutants of Concern
Pollutants of concern are any pollutants or parameters that are believed to be present in the discharge and could affect or alter the physical, chemical, or biological condition of the receiving water. Common pollutants of concern for denitrified reclaimed water are chloride, fecal coliform, nitrogen, sulfate, phosphorus, and TDS.

Receiving Water
Receiving water is groundwater of the State. Depth to groundwater at the site is approximately 85 feet below ground surface (bgs).

Based on the findings of the Supreme Court case, *Sackett vs. Environmental Protection Agency*, on May 25, 2023, during which the Supreme Court determined that the Clean Water Act is applicable only to wetlands having a continuous surface connection to bodies that are classified as waters of the United States (U.S.) in their own right, so that they (wetlands) are “indistinguishable” from those waters. It was determined that the Preserve's topographic features disallow it from being considered under the Clean Water Act's criteria for being considered a national designated wetland area, as it does not have a "continuous surface connection" to any waters of the U.S. at any of the three locations paralleling the Las Vegas Wash. Refer to the Clean Water Act, 2023 Rule, under 33 CFR 328.3(a)(4).

Compliance History
The facility was in substantial compliance during the July 2019 to June 2024 reporting period.

Proposed Effluent Limitations
The discharge shall be limited and monitored by the Permittee as specified below.

Re-use Discharge Limitations Table for Sample Location 001 (Diversion Of Reclaimed Water From Ccwrd) To Be Reported Monthly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Flow rate	30 Day Average	M&R Million Gallons per Day (Mgal/d)		Effluent Gross	001	Continuous	METER
Flow rate	Daily Maximum	<= 6.0 Million Gallons per Day (Mgal/d)		Effluent Gross	001	Continuous	METER
Coliform, fecal general	30 Day Geometric Mean		<= 2.2 Most Probable Number per 100ml T (MPN/100mL)[1]	See Footnote[2]	001	Weekly	DISCRT
Coliform, fecal general	Daily Maximum		<= 23 Most Probable Number per 100ml T (MPN/100mL)[1]	See Footnote[2]	001	Weekly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	See Footnote[2]	001	Monthly	DISCRT
Nitrogen, total	Daily Maximum		M&R Milligrams per Liter (mg/L)	See Footnote[2]	001	Monthly	DISCRT
Sulfate, total (as SO4)	Daily Maximum		M&R Milligrams per Liter (mg/L)	See Footnote[2]	001	Monthly	DISCRT
Chloride (as Cl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	See Footnote[2]	001	Monthly	DISCRT
Phosphorus, total (as P)	Daily Maximum		M&R Milligrams per Liter (mg/L)	See Footnote[2]	001	Monthly	DISCRT
Oxygen, dissolved (DO)	Daily Maximum		M&R Milligrams per Liter (mg/L)	See Footnote[2]	001	Monthly	DISCRT

Notes (Re-use Discharge Limitations Table):

1. CFU or MPN/100mL.
2. Effluent to be sampled by CCWRD prior to discharge to the Preserve and data provided to the Permittee for DMR submission.

Re-use Discharge Limitations Table for Sample Location 001 (Diversion Of Reclaimed. Water From Ccwrd) To Be Reported Annually

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Flow, total	Annual Total	M&R Million Gallons (Mgal)		Prior to Reuse	001	Continuous	CALCTD

Re-use Discharge Limitations Table for Sample Location 002 (Monitoring Site Np-8 (Beaver Bridge)) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Coliform, fecal general	Daily Maximum		M&R Most Probable Number per 100ml T (MPN/100mL)	Internal Monitoring Point	002	Quarterly	DISCRT
Nitrogen, total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	002	Quarterly	DISCRT
Sulfate, total (as SO4)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	002	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	002	Quarterly	DISCRT

Re-use Discharge Limitations Table for Sample Location 003 (Monitoring Site Du-1 (Pond #7)) To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Coliform, fecal general	Daily Maximum		M&R Most Probable Number per 100ml T (MPN/100mL)	Internal Monitoring Point	003	Quarterly	DISCRT
Nitrogen, total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	003	Quarterly	DISCRT
Sulfate, total (as SO4)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	003	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Internal Monitoring Point	003	Quarterly	DISCRT

Summary of Changes From Previous Permit
An additional "Flow Total" parameter for an "Annual Total" was added under Outfall 001.

Discharge Limitations under the Base heading for Outfall 002 and Outfall 003, were changed from “Quarterly Average” to “Daily Maximum” on permit.

Measurement Frequencies at Outfall 002 and Outfall 003 were changed from “Monthly” to “Quarterly” on the permit.

The CCWRD, under Permit NS2018508, is now discharging to the wetlands, reclaimed water treated to a Category “B” level, so the effluent characterization was updated to reflect this enhanced treatment and associated bacteriological quality for the 30-day geometric mean and daily maximum numbers per Nevada Administrative Code (NAC) 445A.276. Permit's effluent characterization and discharge parameters were updated. Under the previous permit, the Preserve was receiving Category D bacteriological quality reclaimed water from plant.

The Daily Maximum flow was revised from "5.0 MGD" to "6.0 MGD" on the permit.

Under Outfall 001, to be reported monthly, the "Nitrogen, nitrate total" parameter was updated to "Nitrogen, total" to be consistent with Division reporting parameters.

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.

Proposed Water Quality Based Effluent Limits (monthly/weekly/daily)
Water quality based effluent limitations are not applicable to this permit.

Basis for Effluent Limitations
Fecal coliform is required to be monitored to assess the quality of reclaimed water being applied and

for the protection of human health and the environment.

The proposed permit establishes the requirement to report the total nitrogen applied to ensure groundwater of the State is not being degraded.

The proposed permit retains the requirement to report TDS to ensure groundwater of the State is not degraded and affecting aquatic life and human health.

The proposed permit retains the requirement to report sulfate to ensure water quality and soil is not impacted.

The proposed permit includes a new requirement to report Phosphorus to eliminate any potential negative impacts to the aquatic life of the wetlands and prevent any algal blooms.

The proposed permit includes the new requirement to report Dissolved Oxygen to prevent any disruptions to the natural ecosystem located within the wetlands area.

The proposed permit retains the requirement to report Chloride to prevent deterioration of groundwater quality.

Anti-backsliding

To prevent backsliding, effluent limitations in reissued permits are required to be as stringent as those in the previous permit. Additional reporting requirements were added to the permit making it more stringent in manner at Outfall 001, through which the reclaimed water is delivered. The other two outfalls were granted the ability to report on a quarterly basis instead of monthly, making those parameters less stringent, but based on the pollutant parameters being measured originally at Outfall 001, the extension of the reporting time period at the later two outfalls will not cause any backsliding issues.

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 40 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. This objective is achieved through the implementation of procedures to ensure that waters are 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 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 use 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.

As the proposed discharge from the facility is considered an expanded point source (i.e., increase in the maximum daily discharge flow rate), an antidegradation review was conducted. It was determined that the wetland merits Tier 1 protection as it is considered effluent-dominated waters (i.e., a surface water or segment thereof that consists of greater than 80% wastewater effluent for at least 300 days in a 365-day period). Tier 1 protection requires water quality be maintained and protected to meet the applicable water quality criteria. Although there are no established criteria for the wetland, the Division has determined that increasing the amount of discharge will not degrade water quality in the wetland since the composition of treated effluent is not expected to change. Additionally, data reviewed during the renewal process does not indicate the potential for degradation of waters of the State from the reclaimed water discharged within the compliance limits of the proposed permit.

Special Conditions

There are no Special Approvals/Conditions.

SA – Special Approvals / Conditions Table

There are no Special Approval / Condition items

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

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

Wellhead Protection Program
The nearest Public Water Supply (PWS) well is located approximately four (4) miles to the northwest of the outfalls. The outfalls are not located within a Wellhead Protection Area, which represents an approximate 10-year capture zone of a well, or within a Drinking Water Protection Area, which is defined by a 3,000-foot radius around a PWS well.

Schedule of Compliance:

SOC – Schedule of Compliance Table

Item #	Description	Due Date
1	The Permittee shall submit two (2) copies (one hard copy and one electronic copy) of a Reclaimed Water Management Plan (RWMP) to the Division for review and approval. The RWMP shall follow the Division's guidance document WTS1B: General Design Criteria for Preparing a Reclaimed Water Management Plan.	12/1/2025

Deliverable Schedule:

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

Item #	Description	Interval	First Scheduled Due Date
1	Quarterly DMRs	Quarterly	10/28/2025
2	Annual Report	Annually	1/28/2026

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. **7/24/2025,** 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: **Melissa Hanson**
Date: **6/13/2025**
Title: **Staff II Engineer**