

**PRIOR NOTIFICATION FORM**

Date: 06/01/16

Requester: Fredrick Stater

Source Name: Tronox LLC

Source ID (if applicable): 00095

Outstanding Balance (if applicable): \$0.00

Action Needed:

- No Action needed; attach to front page to Permit
- Application needed; send Manager's form letter
- Other:

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Comments:

The proposed temporary activity will not increase the emissions from the processing of the MnO<sub>2</sub> operations. The addition of MnO into the system using super sacks will actually reduce the emissions and may help resolve the on-going fugitive emissions issues at the facility.

---

Manager's Approval:



Date: 6/10

# TRONOX

Fredrick R. Stater  
Plant Manager – Henderson  
Tronox LLC

RECEIVED  
CC-DAQM

(702) 651-2233  
Fax (702) 651-2310  
R.Stater@tronox.com

2016 JUN -1 P 1:07

May 31, 2016

Mr. Richard Beckstead  
Permitting Manager  
Clark County Department of Air Quality  
4701 West Russell Road, Suite 200  
Las Vegas, NV 89118

Re: Tronox Henderson Facility, Source 95  
Proposed Emissions Reduction Test Plan

Dear Mr. Mathew:

Tronox LLC (Tronox) operates an inorganic chemical processing facility in Henderson, NV (Henderson facility). This facility maintains an operating permit for a synthetic minor source issued by the Clark County Department of Air Quality (DAQ). Tronox submitted a Title V Permit Application on May 6, 2014. This application was deemed complete by DAQ on Dec. 18, 2014.

Tronox has been investing considerable effort and funds into evaluating options for reducing manganese particulate emissions at its Henderson facility. The main focus of these investigations centers around alternative ores and ore roasting. Several years have been spent meeting with manganese ore suppliers from various parts of the world and performing in-depth chemical testing. Operating on a pre-reduced ore would allow Tronox to by-pass the currently operating open hearth system which would greatly reduce both manganese particulate and greenhouse gas emissions.

Since the operating permit for the Henderson facility does not specifically address performing testing with pre-reduced manganese ore, Michael Skromyda, Tronox Environmental Engineer, contacted your office on 5/23/16 to request permitting guidance on the matter. As directed by you, a "Prior Notification Form" has been filled out and is attached.

If you have any questions regarding this submittal, please feel free to contact either Michael Skromyda, at (702) 651-2228 or me at (702) 651-2223.

Sincerely



Fredrick R. Stater  
Plant Manager  
Tronox – Henderson, NV

cc: (Electronic Copies)  
Marci Henson (DAQ)  
Shibi Paul (DAQ)  
Dan Reaser (Fennemore Craig, P.C.)  
Steven Kaye (Tronox)

Tronox LLC

560 West Lake Mead Parkway, Henderson, Nevada 89015 • P.O. Box 55, Henderson, Nevada 89009



CLARK COUNTY • DEPARTMENT OF AIR QUALITY  
4701 W. Russell Rd., Suite 200 • 2<sup>nd</sup> Floor • Las Vegas, NV 89118-2231  
(702) 455-5942 • Fax (702) 383-9994

For DAQ Use Only	
Invoice Number:	_____
_____	

Source ID # \_\_\_\_\_ 95 \_\_\_\_\_

Source Ownership \_\_\_\_\_ Tronox LLC \_\_\_\_\_

Source Name \_\_\_\_\_ Tronox LLC \_\_\_\_\_

### Prior Notification Form

*This form may be used to accomplish changes at a minor source **ONLY IF** the changes are not a significant permit revision (12.1.6(a)), a minor permit revision (12.1.6(b)), or an administrative permit revision (12.1.6(c)).*

**Changes That Can Be Made With Prior Notice (12.1.6(d)).** The following changes at a minor source may be made without a permit revision if the source provides prior written notice of the change on this form by the deadlines specified in the applicable paragraph below. No change listed under this section shall proceed if the Control Officer objects within the applicable waiting period.

#### Check ALL that apply to the change(s) proposed in this notice:

- (1)  Replacing an item of air pollution control equipment listed in the permit with one that is not identical, but is substantially similar and has the same or better pollutant removal efficiency: thirty (30) days after the date of receipt of the written notice by the Department. The Control Officer may require a verification of the efficiency of the new equipment by performance tests;
- (2)  A physical change or a change in the method of operation, that increases actual emissions less than ten (10) percent of the applicable major source threshold for the air pollutant(s) emitted, but does not increase the source's potential to emit: seven (7) days after the date of receipt of the written notice by the Control Officer.
- (3)  A change that would trigger an applicable requirement that already exists in the permit: thirty (30) days after the date of receipt of the written notice by the Control Officer, unless otherwise required by the applicable requirement;
- (4)  A change that amounts to reconstruction of the source or an individual emission unit, unless the reconstruction triggers a new applicable requirement: seven (7) days after the date of receipt of the written notice by the Control Officer. For purposes of this requirement, reconstruction of a source or an emission unit shall be presumed if the fixed capital cost of the new component(s) exceeds fifty (50) percent of the fixed capital cost of a comparable entirely new source or emission unit; or

- (5)  A change that will result in the emissions of a new regulated air pollutant above an applicable regulatory threshold, but that does not trigger a new applicable requirement for that source category: thirty (30) days after the date of receipt of the written notice by the Control Officer. For purposes of this requirement, the applicable regulatory threshold for a regulated air pollutant shall be ten (10) percent of the applicable major source threshold for that pollutant.

**Describe in detail the proposed change(s) in the space provided:**

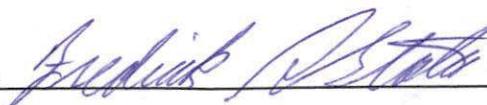
Proposed Change(s)
<p>Tronox would like to begin testing a pre-reduced manganese oxide (MnO) ore at its Henderson facility as part of an emission reduction project. Currently Tronox is permitted to receive manganese dioxide (MnO<sub>2</sub>) ore by truck, store it in stockpiles and process 40,000 dry US tons/yr. A significant percentage of the Henderson facility's particulate matter (PM) emissions come from the MnO<sub>2</sub> ore hearth roasting area. This emission reduction project focuses on reducing both PM and gaseous emissions associated with the hearth operations by substituting the usual non-reduced MnO<sub>2</sub> ore with pre-reduced (MnO) ore. Overall this test program will result in a reduction in emissions since the new ore is received pre-packaged in supersacks (no fugitive emissions from truck unloading or ore storage) and does not require chemical reducing in the hearth area (elimination of fugitive dust and gaseous emissions associated with roasting).</p> <p>Although there will be an overall emissions reduction during this test, there will be a small change in the method of MnO<sub>2</sub> process operations at Tronox's Henderson facility. As mentioned this MnO ore will arrive pre-packaged in ~2,800 lb. supersacks. These supersacks will be emptied into a bucket of a front end loader and fed into the Polishing Bins at the hearth area. Based on a particulate emission factor (0.12 lbs.PM / ton ore) from AP-42 (Table 11.24.-2) the emptying 3,000 metric tons of MnO ore from supersacks into the front-end bucket will generate ~ 397 lbs. of PM. This small amount of PM should be significantly offset by the reduced ore handling and elimination of processing of the MnO on the hearths. Tronox plans on introducing ~3,000 metric tons of this MnO ore during a 90-100 day test period.</p>

Additional pages may be added as necessary.

ATTACH copy(ies) of Manufacturer's Specifications supporting the information provided above, as applicable.

**Truth and Accuracy Certification**

As the Responsible Official, based upon information and belief formed after reasonable inquiry, I certify that the statements and information in this application are true, accurate, and complete. My signature acknowledges that I am liable under Nevada Revised Statutes (NRS) that forbid false or misleading statements.

Responsible Official's Signature:  Date: 05/24/16

Print Name: Fredrick R. Stater

**CLARK COUNTY**  
**DEPARTMENT OF AIR QUALITY**  
*4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118*  
**Authority To Construct**  
**Source: 95**  
Issued in accordance with the  
Clark County Air Quality Regulations (AQR)

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**ISSUED TO: Tronox, LLC**

**SOURCE LOCATION:**

BMI Complex  
Henderson, Nevada  
T22S, R62E, Sections 12-13  
Hydrographic Basin Number: 212

**COMPANY ADDRESS:**

560 West Lake Mead Parkway  
Henderson, Nevada 89015

**NATURE OF BUSINESS:**

SIC 2819: Industrial Inorganic Chemical Manufacturing  
NAICS code: 325188: Inorganic Chemical Manufacturing

**RESPONSIBLE OFFICIAL:**

Name: Fredrick Stater  
Title: Plant Manager  
Phone: (702) 651-2233  
Fax Number: (702) 651-2310  
Email: rick.stater@tronox.com

**Permit Issuance Date: January 21, 2016**

**ISSUED BY: CLARK COUNTY DEPARTMENT OF AIR QUALITY**



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Richard Beckstead  
Permitting Manager, Clark County Department of Air Quality

## EXECUTIVE SUMMARY

Tronox LLC (Tronox) is located within the BMI industrial park near Henderson, Nevada. The legal description of the source location is: portions of T22S, R62E, Sections 12-13 in Las Vegas Valley, County of Clark, State of Nevada. Tronox is situated in the Las Vegas Valley Hydrographic Basin 212. The Las Vegas Valley is currently designated as attainment for all pollutants.

The source operates chemical processes which produce inorganic chemicals. The three primary chemicals are Manganese Dioxide ( $MnO_2$ ), elemental Boron and Boron Trichloride ( $BCl_3$ ). Tronox also produces advanced battery products (ABM; previously permitted as LMO) from the  $MnO_2$ . In addition, Tronox employs diesel fired emergency engines, natural gas boilers, cooling towers, a gasoline tank, roads and stockpiles and a laboratory to support operations, some of which are deemed insignificant units or activities.

The source is categorized under SIC Code SIC 2819 Industrial Inorganic Chemical Manufacturing and NAICS code: 325188: Inorganic Chemical Manufacturing. Tronox is a major source for single HAP (Manganese) and Total HAP and is synthetic minor source for  $PM_{10}$ ,  $PM_{2.5}$ ,  $NO_x$ , CO,  $SO_x$ , and VOC. Tronox is a source of greenhouse gases (GHG).

The following table summarizes the source PTE for each regulated air pollutant for the proposed emergency engine:

### Annual Potential Emissions of the Proposed Generator (TPY)

Emission Unit	$PM_{10}$	$PM_{2.5}$	$NO_x$	CO	$SO_x$	VOC	HAP (total)	GHG <sup>1</sup>
A08	0.02	0.02	0.82	0.08	0.01	0.03	0.01	79.31

<sup>1</sup>GHG is expressed as  $CO_2e$  for information only.

The source requested an Authority to Construct to replace emergency generator A01 with a larger, newer unit.

Pursuant to AQR 12.4, all terms and conditions in Sections I through IV in this permit are federally enforceable unless explicitly denoted otherwise.

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## I. ACRONYMS AND ABBREVIATIONS

**Table I-1: Acronyms and Abbreviations**

Term	
Air Quality	Clark County Department of Air Quality
AQR	Clark County Air Quality Regulations
ATC	Authority to Construct
CAAA	Clean Air Act, as amended
CFC	Chlorofluorocarbon
CFR	United States Code of Federal Regulations
CO	Carbon Monoxide
EPA	United States Environmental Protection Agency
EU	Emission Unit
GHG	Greenhouse Gases
HAP	Hazardous Air Pollutant
HP	Horse Power
kW	kilowatt
Mn	Manganese
NAICS	North American Industry Classification System
NO <sub>x</sub>	Nitrogen Oxides
NRS	Nevada Revised Statutes
OP	Operating Permit
PM <sub>10</sub>	Particulate Matter less than 10 microns
PM <sub>2.5</sub>	Particulate Matter less than 2.5 microns
PTE	Potential to Emit
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO <sub>x</sub>	Sulfur Oxides
Tronox	Tronox LLC
VOC	Volatile Organic Compound

## **II. GENERAL CONDITIONS**

### **A. GENERAL REQUIREMENTS**

1. No person shall begin actual construction of a New Part 70 source, or modify or reconstruct an existing Part 70 source that falls within the preconstruction review applicability criteria, without first obtaining an Authority to Construct Permit from the Control Officer. [AQR 12.4.1.1(a)]
2. The Permittee shall post the permit in a location which is clearly visible and accessible to the facility's employees and representatives of the department. [AQR 12.4.3.1(e) (16) and 12.13]
3. The Permittee shall commence the construction, modification, or reconstruction of this source within eighteen (18) months after the date of issuance of this Authority to Construct Permit and construction shall not be discontinued for a period greater than twelve (12) months. [AQR 12.4.1.1(b)]
4. The Permittee shall submit an application for a Part 70 Operating Permit within twelve (12) months after commencing operation. If the source submits a timely application under this condition, it may continue operating under its Authority to Construct Permit until final action is taken on its application for a new Part 70 Operating Permit. [AQR 12.4.1.1(b) and 12.5.2.1(a)(1)]
5. Notwithstanding the provisions of Condition 4 if an existing Part 70 Operating Permit would prohibit such construction or change in operation, the source must obtain a Part 70 permit revision pursuant to Section 12.5.2.14 before commencing operation. [AQR 12.4.1.1(c)].
6. This ATC does not convey any property rights or any exclusive privilege. [AQR 12.4.3.1(e)(6)]
7. The Permittee shall pay all fees assessed pursuant to AQR Section 18. [AQR 12.4.3.1(e)(17)]

### **B. MODIFICATION, REVISION, RENEWAL REQUIREMENTS**

1. The Permittee shall file an application for any change in the Responsible Official of the source and may implement the change immediately upon submittal of the request. [AQR 12.4.3.4(a)(1)(D) and 12.4.3.4(a)(2)(C)]
2. The Permittee shall file an application for a transfer of ownership at least 30 days prior to the date of a change in ownership or operational control of the source and such application shall constitute a temporary ATC under the conditions of the existing permit. [AQR 12.12.2(c) and (d)]
3. The Control Officer may revise, revoke and reissue, reopen and revise, or terminate the permit for cause. [AQR 12.4.3.1 (e)(5)]
4. The Control Officer reserves the right, upon reasonable cause, to modify existing conditions and impose additional new compliance, monitoring and control requirements. [AQR 12.4.3.1(e)(10)(B) and (C)]

### **C. REPORTING/NOTIFICATIONS/PROVIDING INFORMATION REQUIREMENTS**

1. The Permittee shall report start of construction, construction interruptions exceeding nine (9) months, and completion of construction to the Control Officer in writing not later than fifteen (15) working days after occurrence of the event. [AQR 12.4.3.1(e) (12)]
2. The Permittee shall provide written notification of the actual date of commencing operation, received by the Control Officer, within fifteen (15) calendar days after such date. [AQR 12.4.3.1(e) (13)]

3. The Permittee shall provide separate written notification for commencing operation for each unit of phased construction, which may involve a series of units commencing operation at different times. [AQR 12.4.3.1(e) (14)]
4. The Permittee shall retain records of all required monitoring and performance demonstration data and supporting information for five (5) years after the date of the sample collection, measurement, report, or analysis. Supporting information includes all records regarding calibration and maintenance of the monitoring equipment, all original strip-chart recordings for continuous monitoring instrumentation, and if applicable, all other records required to be maintained pursuant to 40 CFR 64.9(b). [AQR 12.4.3.1(e)(1)]
5. The Permittee shall allow the Control Officer or any authorized representative of the Control Officer upon presentation of credentials to enter the permittee's' premises where the source is located or emissions related activity is conducted to: [AQR 12.4.3.1(e)(8)]
  - a. Have access to and copy during normal business hours any records that are kept pursuant to the conditions of the permit;
  - b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under this permit;
  - c. Sample or monitor substances or parameters to determine compliance with the conditions of the permit or applicable requirements; and
  - d. Document alleged violations using devices such as cameras or video equipment.
6. The Permittee shall provide the Control Officer, within a reasonable time, with any information that the Control Officer requests in writing to determine whether cause exists for revising, revoking and reissuance or terminating the permit, or to determine compliance with the conditions of the permit. Upon request the Permittee shall also furnish to the Control Officer copies of any records required to be kept by the permit, or for information claimed to be confidential, the Permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [AQR 12.4.3.1(e)(7)]

#### **D. COMPLIANCE REQUIREMENTS**

1. The Permittee shall comply with all conditions contained in this ATC. Any noncompliance constitutes a violation and is grounds for an action for noncompliance, revocation and reissuance or the termination of the permit by the Control Officer, or the reopening or revising of the permit by the Permittee as directed by the Control Officer. [AQR 12.4.3.1(e)(3)]
2. Each of the conditions and requirements of this permit are severable and if any are held invalid, the remaining conditions and requirements continue in effect. [AQR 12.4.3.1(e)(2)]
3. The need to halt or reduce activity to maintain compliance with the conditions of the permit is not a defense to noncompliance with any condition of the permit. [AQR 12.4.3.1(e)(4)]
4. The Permittee shall promptly report to the Control Officer (4701 West Russell Road, Suite 200 – Second Floor, Las Vegas, Nevada 89118) upon the commencement of operation deviations from permit requirements, including those attributable to malfunction, startup, or shutdown. All reports of deviations shall identify the probable cause of the deviations and any corrective actions or preventative measures taken. [12.5.2.6(d)(4)(B) and (C)]
5. A responsible official of the source shall certify that, based on information and belief formed after a reasonable inquiry, the statements made in any document required to be submitted by any condition of the permit are true, accurate, and complete. [AQR 12.4.3.1(e)(9)]

**III. SOURCE-WIDE PTE SUMMARY**

The source is a major source of HAP (Mn) and synthetic minor source of PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO, SO<sub>x</sub>, VOC. The source-wide PTE is not accurately established for this source at the time of the issuance of this ATC and therefore, it is not listed in this ATC.

**Table III-A-1: New Generator PTE (tons per year)**

EU	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>x</sub>	VOC	HAP (Total)
A08	0.02	0.02	0.82	0.08	0.01	0.03	0.01

<sup>1</sup>Emission factors are manufacturer's guarantees except for SO<sub>x</sub> which is Air Quality default and HAP which is AP-42.

**IV. EMISSION UNITS AND APPLICABLE REQUIREMENTS**

**A. Emission Units**

The equipment covered by this ATC consists of the emission unit and associated appurtenances summarized in Table IV-A-1.

**Table IV-A-1: List of Emission Units**

EU	Description	Rating	Make	Model No.	Serial No.
A08	Emergency Generator, Diesel DOM: October 18, 2005	150 kW 277 hp	Cummins Power Generation	DGFA-5742405	J050847497

**B. Emission Limitations and Standards**

**1. Emission Limits**

- a. The Permittee shall not allow any emission unit to emit more than an average of 20 percent opacity for more than six consecutive minutes. [AQR 26.1]

**2. Operational Limits**

- 1. The Permittee shall limit the operation of the emergency generator (EU: A08) for testing and maintenance purposes to 100 hours per year. The Permittee may operate the emergency generator up to 50 hours per year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. The 50 hours per year for nonemergency situations cannot be used for peak shavings or demand response. [40 CFR 63.6640(f)(2 and 3)]

**3. Control Requirements**

Generators/Engines [12.4.3.1(e)(10)(A)]

- 1. The Permittee shall operate the emergency generator with a turbocharger and an aftercooler (EU: A08).
- 2. The Permittee shall operate and maintain the emergency generator in accordance with the manufacturer's specifications.

3. The emergency generator shall combust only ultra-low sulfur (15 ppm) diesel fuel.
4. The Permittee shall maintain the emergency generator (EU: A08) as follows, unless the manufacturer's specifications are more stringent: *[40 CFR 63, Subpart ZZZZ]*
  - a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - b. Inspect air cleaners every 1,000 hours of operation or annually, whichever comes first;
  - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; and
  - d. the Permittee may utilize an oil analysis program as described in Subpart 63.6625(i) in order to extend the specified oil change requirement and can petition the Control Officer pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.

Other

5. The Permittee must comply with the control requirements contained in this section. If there is inconsistency between standards or requirements, the most stringent standard or requirement shall apply.

**C. Monitoring *[12.4.3.1(e)(10)B]***

1. The Permittee shall conduct a weekly visual emissions check for visible emissions from the facility while it is in operation.
2. If the Permittee, during the visible emissions check, does not see any plume that, on an instantaneous basis, appears to exceed the opacity standard, then the observer shall keep a record of the name of the observer, the date on which the observation was made, the location, and the results of the observation.
3. If the Permittee sees a plume that, on an instantaneous basis, appears to exceed the opacity standard, the Permittee shall:
  - a. take immediate action to correct causes of fugitive/stack emissions that appear to exceed allowable opacity limits; or
  - b. if practical, have a certified VE observer take an EPA Method 9 observation of the plume and record the results, and take immediate action to correct causes of fugitive emissions in excess of allowable opacity limits in accordance with 40 CFR 60 Appendix A: Reference Method 9.
4. Visible emissions checks do not require a certified VE observer, except where visible emissions appear to exceed the allowable opacity limit and exceed 30 seconds in duration, and an EPA Method 9 observation is made to establish it does not exceed the standard.

Generator

5. The Permittee shall operate the emergency generator (EU: A08) with a nonresettable hour meter and monitor the duration of operation for testing, maintenance and nonemergency operation, and separately for emergencies. The nature of the emergency leading to emergency operation shall be documented.

Other

6. The Permittee shall report to the Control Officer (4701 West Russell, Suite 200, Las Vegas, Nevada 89118) any upset, breakdown, malfunction, emergency or deviation which cause emissions of regulated air pollutants in excess of any limits set by regulation or by this permit. The report shall be in two parts as specified below: *[AQR 25.6.1]*

- a. within twenty-four (24) hours of the time the Permittee learns of the event, the report shall be communicated by phone (702) 455-5942, fax (702) 383-9994, or email.
  - b. within seventy-two (72) hours of the notification required by paragraph (a) above, the detailed written report containing the information required by AQR Section 25.6.3 shall be submitted.
7. Pursuant to AQR Section 40 no person shall cause or allow the discharge from any source whatsoever such quantities of air contaminants or other material which cause a nuisance.
  8. Pursuant to AQR Section 43, an odor complaint shall be deemed a violation if a complaint is received and substantiated by a control officer such that the odor causes a nuisance.
  9. Records and data required by this permit, and maintained by the Permittee, may be audited, at the Permittee's expense, at any time by a third party selected by the Control Officer.

**D. Testing**

Testing has not been identified for EU A08.

**E. Record Keeping [12.4.3.1(e)(10)B]**

1. All records, logs, etc. shall be made available to the Control Officer during regular business hours.
2. All records, logs, etc., or a copy thereof, shall be kept on site for a minimum of 5 years from the date the measurement, or data was entered.
3. Various records, logs, etc., shall contain, at minimum, the following information:
  - a. date and duration of run time pertaining to operation of the emergency generator, when operated, for testing and maintenance purposes, and separately for use during emergencies (EU: A08).

**F. Reporting [12.4.3.1(e)(10)B]**

1. The Permittee shall submit all reports addressed to the attention of the Control Officer. [AQR 14.1(b)]
2. All reports shall contain the following: [AQR 12.4.3.1(e)(10)B]
  - a. A certification statement on the first page, i.e., "I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate and complete." (A sample form is available from Air Quality); and
  - b. A certification signature from a responsible official of the company and the date of certification.
3. The Permittee shall submit annual emissions inventory reports based on the following: [AQR 18.6.1]
  - a. The annual emissions inventory must be submitted to Air Quality by March 31 of each calendar year; and
  - b. The report shall include the emission factors and calculations used to determine the emissions from each permitted emission unit, even when an emission unit is not operated.
4. The following requirements apply to annual reports: [AQR 12.4.3.1(e)(10)B]
  - a. The report shall include an annual summary of each item listed in Section IV-E-3(a).
  - b. The report shall be based on a calendar year, which includes partial reporting periods.

**Table IV-F-1: Required Submission Dates for Various Reports**

Required Report	Applicable Period	Due Date <sup>1</sup>
Annual Emission Inventory Report	Calendar Year	March 31 each year
Notification of Malfunctions, Startup, Shutdowns or Deviations with Excess Emission	As Required	Within 24 hours of the Permittee learns of the event
Report of Malfunctions, Startup, Shutdowns or Deviations with Excess Emission	As Required	Within 72 hours of the notification
Deviation Report without Excess Emissions	As Required	Along with semiannual reports
Performance Testing	As Required	Within 60 days from the end of the test.

<sup>1</sup> If the due date falls on a Saturday, Sunday or a Federal or Nevada holiday, then the submittal is due on the next regularly scheduled business day.

- The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit emission limits, applicable permit requirements, and requirements of applicable federal regulations. [AQR 4.4]

**G. Mitigation**

No federal offset requirements have been identified.