

CLARK COUNTY
DEPARTMENT OF AIR QUALITY
4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118
Part 70 Operating Permit
Source: 533
Issued in accordance with the
Clark County Air Quality Regulations (AQR)

**ISSUED TO: Nevada Power Company, dba NV Energy,
Harry Allen Station**

SOURCE LOCATION:
Apex Dry Lake Industrial Park
Apex Valley, Nevada
T17S, R63E, Sections 23, 35, and 36
Hydrographic Basin Number: 216

COMPANY ADDRESS:
P.O. Box 98910, MS #30
Las Vegas, Nevada 89151

NATURE OF BUSINESS:
SIC Code 4911: Electric Services
NAICS: 221112: Fossil Fuel Electric Power Generation

RESPONSIBLE OFFICIAL:
Name: Kevin Geraghty
Title: Vice President, Generation
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Permit Issuance Date: May 14, 2015

Expiration Date: May 13, 2020

ISSUED BY: CLARK COUNTY DEPARTMENT OF AIR QUALITY



Lewis Wallenmeyer
Director, Clark County Department of Air Quality

EXECUTIVE SUMMARY

Harry Allen Station (HAS) is an electrical power generating station located at Apex Dry Lake Industrial Park. The legal description of the source location is: portions of T17S, R63E, Sections 23, 25, and 36 in Apex Valley, County of Clark, State of Nevada. HAS is situated in hydrographic area 216 (Garnet Valley). Garnet Valley is designated as attainment for all pollutants.

HAS is classified as a Categorical Stationary Source, as defined by AQR 12.2.2(j)(1). HAS is a Major stationary source for PM₁₀, PM_{2.5}, NO_x, and CO, and is Minor for SO₂, VOC and HAP. HAS is a source of Greenhouse Gasses (GHG). HAS operates a total of four combustion turbines of which two are simple cycle turbines and the other two are combined cycle turbines. Other operating emission units include three emergency generators and one diesel emergency fire pump. This Part 70 Operating Permit (Part 70 OP) is issued based on the ATC issued on July 10, 2001, the ATC issued on April 16, 2009, the ATC issued April 27, 2009, the Title V Revision issued on January 15, 2010, the Part 70 OP Significant Revision issued on January 25, 2013 and the renewal application submitted on April 4, 2014, and supplements.

The following table is for informational purposes only and summarizes the source PTE in tons per year for each regulated air pollutant for all emission units addressed by this Part 70 OP:

PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAP	GHG ¹
151.40	151.40	311.73	279.99	14.72	64.93	5.65	2,430,928

¹ GHG is expressed as CO₂e

This action is a renewal of the Part 70 OP and includes the GHG emission rates.

Pursuant to AQR 12.5.2, all terms and conditions in Sections I through VI and Attachments 1 and 2 in this permit are federally enforceable unless explicitly denoted otherwise.

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I. ACRONYMS

Table I-1: Acronyms and Abbreviations

Acronym	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
CEMS	Continuous Emissions Monitoring System
CFC	Chlorofluorocarbon
CFR	United States Code of Federal Regulations
CO	Carbon Monoxide
CTG	Combustion Turbine-Generator
DLN	Dry Low NO _x
EPA	United States Environmental Protection Agency
EU	Emission Unit
GHG	Greenhouse Gasses
HAP	Hazardous Air Pollutant
HAS	Harry Allen Station
HCFC	Hydrochlorofluorocarbon
HHV	Higher Heating Value
HP	Horse Power
kW	kilowatt
LHV	Lower Heating Value
MMBtu	Millions of British Thermal Units
M/N	Model Number
MW	Megawatt
NAICS	North American Industry Classification System
NO _x	Nitrogen Oxides
NRS	Nevada Revised Statutes
OP	Operating Permit
PM ₁₀	Particulate Matter less than 10 microns
ppm	Parts per Million
ppmvd	Parts per Million, Volumetric Dry
PTE	Potential to Emit
QA/AC	Quality Assurance/Quality Control
RATA	Relative Accuracy Test Audits
SCC	Source Classification Codes
scf	Standard Cubic Feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
S/N	Serial Number
SO ₂	Sulfur Dioxide
TCS	Toxic Chemical Substance
ULN	Ultra Low-NO _x
VOC	Volatile Organic Compound

II. GENERAL CONDITIONS

A. General Requirements

1. The Permittee shall comply with all conditions of the Part 70 Operating Permit. Any permit noncompliance may constitute a violation of the Clark County Air Quality Regulations, Nevada law, and the Clean Air Act, and is grounds for the following: enforcement action; permit termination; revocation and reissuance; revision; or denial of a permit renewal application. *[AQR 12.5.2.6(g)(1)]*
2. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall not be affected and shall remain valid. *[AQR 12.5.2.6(f)]*
3. The Permittee shall pay all permit fees pursuant to AQR Section 18. *[AQR 12.5.2.6(h)]*
4. The permit does not convey any property rights of any sort, or any exclusive privilege. *[AQR 12.5.2.6(g)(4)]*
5. The Permittee shall not hinder, obstruct, delay, resist, interfere with, or attempt to interfere with the Control Officer, or any individual to whom authority has been duly delegated for the performance of any duty by the AQR. *[AQR 5.1.1]*
6. The Permittee agrees to allow inspection of the premises, to which this permit relates, by the Control Officer at any time during the Permittee's hours of operation without prior notice. The Permittee shall not obstruct, hamper or interfere with any such inspection. *[AQR 4.3.3; AQR 4.9; AQR 12.5.2.8(b)]*
7. The Permittee shall allow the Control Officer upon presentation of credentials to: *[AQR 4.3 and 12.5.2.8(b)]*
 - a. Have access to and copy any records that must be kept under the conditions of the permit;
 - b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
 - c. Sample or monitor substances or parameters for the purpose of assuring compliance with the permit or applicable requirements; and
 - d. Document alleged violations using devices such as cameras or video equipment.
8. Any Permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. In addition, the Permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit. A responsible official shall certify the additional information consistent with the requirements of AQR Section 12.5.2.4. *[AQR 12.5.2.2]*
9. The Permittee who has been issued a permit under Section 12.5 shall post such permit in a location which is clearly visible and accessible to the facility's employees and representatives of the department. *[AQR 12.5.2.6(m)]*

B. Modification, Revision, Renewal 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 ATC Permit from the Control Officer *[AQR 12.4.1.1(a)]*

2. The permit may be revised, revoked, reopened and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *[AQR 12.5.2.6(g)(3)]*
3. A permit, permit revision, or renewal may be approved only if all of the following conditions have been met: *[AQR 12.5.2.10(a)]*
 - a. The Permittee has submitted to the Control Officer a complete application for a permit, permit revision, or permit renewal, except that a complete application need not be received before a Part 70 general permit is issued pursuant to Section 12.5.2.20; and
 - b. The conditions of the permit provide for compliance with all applicable requirements and the requirements of Section 12.5.
4. The Permittee shall not build, erect, install or use any article, machine, equipment or other contrivance, the use of which conceals an emission, which would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR 60.12]*
5. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit. *[AQR 12.5.2.6(i)]*
6. Permit expiration terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted. *[AQR 12.5.2.11(b)]*
7. For purposes of permit renewal, a timely application is a complete application that is submitted at least six (6) months and not greater than eighteen (18) months prior to the date of permit expiration. If a source submits a timely application under this provision, it may continue operating under its current Part 70 OP until final action is taken on its application for a renewed Part 70 OP. *[AQR 12.5.2.1(a)(2)]*

C. Reporting/Notifications/Providing Information Requirements

1. The Permittee shall submit all compliance certifications to EPA and to the Control Officer. *[AQR 12.5.2.8(e)(4)]*
2. Any application form, report, or compliance certification submitted pursuant to the permit or AQRs shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under AQR 12.5 shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *[AQR 12.5.2.6(l)]*
3. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of 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 12.5.2.6(g)(5)]*
4. Upon request of the Control Officer, the Permittee shall provide such information or analyses as will disclose the nature, extent, quantity or degree of air contaminants which are or may be discharged by such source, and type or nature of control equipment in use, and the Control Officer may require such disclosures be certified by a professional engineer registered in the state. In addition to such report, the Control Officer may designate an authorized agent to make an independent study and report as to the nature, extent, quantity or degree of any air contaminants which are or may be discharged from the source. An

authorized agent so designated is authorized to inspect any article, machine, equipment, or other contrivance necessary to make the inspection and report. [AQR 4.4]

5. 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.

D. Compliance Requirements

1. The Permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [AQR 12.5.2.6(g)(2)]
2. Any person who violates any provision of AQR, including, but not limited to, any application requirement; any permit condition; any fee or filing requirement; any duty to allow or carry out inspection, entry or monitoring activities or any requirements by Air Quality is guilty of a civil offense and shall pay civil penalty levied by the Air Pollution Control Hearing Board and/or the Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. [AQR 9.1]
3. Any person aggrieved by an order issued pursuant to AQR Section 9 is entitled to review as provided in Chapter 233B of NRS. [AQR 9.12]
4. The Permittee shall comply with the requirements of 40 CFR 61, Subpart M, of the National Emission Standard for Asbestos for all demolition and renovation projects. [AQR 13.1(b)(8)]
5. The Permittee shall certify compliance with terms and conditions contained in the OP, including emission limitations, standards, work practices, and the means for monitoring such compliance. [AQR 12.5.2.8(e)]
6. The Permittee shall submit compliance certifications annually in writing to the Control Officer (4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118) and the Administrator at USEPA Region IX (Director, Air and Toxics Divisions, 75 Hawthorne Street., San Francisco, California 94105). A compliance certification for each calendar year will be due January 30th of the following year and include all the following: [AQR 12.5.2.8(e)]
 - a. the identification of each term or condition of the permit that is the basis of the certification;
 - b. the identification of the methods or other means used by the Permittee for determining the compliance status with each term and condition during the certification period. The methods and means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements described in 40 CFR 70.6(a)(3). If necessary, the Permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and
 - c. the status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in subsection II.D.6(b). The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify, as possible exceptions to compliance, any periods during which compliance is required and in which an excursion or exceedance (as defined under 40 CFR Part 64) occurred.

7. The Permittee shall report to the Control Officer (4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118) any startup, shutdown, malfunction, 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 12.5.2.6(d)(4)(B); AQR 25.6.1]
 - a. within twenty-four (24) hours of the time the Permittee learns of the excess emissions, the notification shall be provided by phone (702) 455-5942, fax (702) 383-9994, or email: airquality@clarkcountynv.gov; and
 - b. within seventy-two (72) hours of the notification required by paragraph (a) above, a detailed written report, certified by a responsible official, containing the information required by AQR Section 25.6.3 shall be submitted.
8. The Permittee shall report to the Control Officer with the semiannual monitoring report all deviations from permit conditions that do not result in excess emissions, including those attributable to malfunction, startup, or shutdown. Reports shall identify the probable cause of each deviation and any corrective actions or preventative measures taken. [AQR 12.5.2.6(d)(4)(B)]
9. The owner or operator of any source required to obtain a permit under Section 12 shall report to the Control Officer emissions that are in excess of an applicable requirement or emission limit that pose a potential imminent and substantial danger to public health, safety or the environment as soon as possible, but in no case later than twelve (12) hours after the deviation is discovered, with a written report submitted within two (2) days of the occurrence. [AQR 25.6.2]

E. Performance Testing Requirements

1. Upon request of the Control Officer, the Permittee shall test or have tests performed to determine the emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of that allowed by the Air Quality regulations is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice. The Control Officer may observe the testing. All tests shall be conducted by reputable, qualified personnel. [AQR 4.5]
2. Upon request of the Control Officer, the Permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. [AQR 4.6]
3. The Permittee shall submit for approval a performance testing protocol which contains testing, reporting, and notification schedules, test protocols, and anticipated test dates to the Control Officer (4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118) not less than 45 nor more than 90 days prior to the anticipated date of the performance test, unless otherwise specified in Section III.D. [AQR 12.5.2.8]
4. The Permittee shall submit to EPA for approval any alternative test methods that are not already approved by EPA, to demonstrate compliance with a requirement under 40 CFR Part 60. [40 CFR 60.8(b)]
5. The Permittee shall submit a report describing the results of each performance test to the Control Officer within 60 days from the end of the performance test. [AQR 12.5.2.8]

III. EMISSION UNITS AND APPLICABLE REQUIREMENTS

A. Emission Units

The stationary source covered by this Part 70 OP consists of the emission units and associated appurtenances summarized in Table III-A-1. [AQR 12.5.2.3]

Table III-A-1: List of Emission Units

EU	Description	Rating	Make	Model Number	Serial Number
A01	CTG Natural Gas Turbine (Turbine Unit 5)	185 MW (185 MEQ)	General Electric	PG7241FA	298914
A02	CTG Natural Gas Turbine (Turbine Unit 6)	185 MW (185 MEQ)	General Electric	PG7241FA	298915
A03	Duct Burner HRSG associated with A01	173 MMBtu/hr (LHV) 22.8 MEQ			
A04	Duct Burner HRSG associated with A02	173 MMBtu/hr (LHV) 22.8 MEQ			
A07 ¹	Diesel Emergency Generator	275 kW	Katolight	D275FJP4	AD129178SLM
A08 ²	Diesel Emergency Generator	350 kW	Caterpillar	SR4B	8ER03545
A09	Natural Gas Only Turbine (Turbine Unit 4)	75 MW (MEQ = 28)	General Electric	MS7001EA (PG7121)	298532
53301	Natural Gas Only Turbine (Turbine Unit 3)	79.2 MW (MEQ = 53)	General Electric	MS7001EA	296449
53302	Diesel Emergency Generator	500 kW	Cummins	500DFGA	C940536630
A11	Diesel Emergency Fire Pump	175 hp	Clarke	JU6H-UF34	PE6068T751998

¹ Located at the Harry Allen substation.

² Located at the Harry Allen switchyard.

Table III-A-2: List of Insignificant Emission Units and Activities

Mobile Combustion Sources
Station Maintenance Activities
Maintenance Shop Activities
Steam Cleaning Operations
Diesel Tanks for Emergency Genset and Fire Pump
Ammonia Storage Vessels
Lubrication Oil Sumps and Vents
Wet Surface Air Coolers

B. Emission Limitations and Standards

1. Emission Limits

- a. The Permittee shall limit the actual and allowable emissions from each emission unit to the PTE listed in Table III-B-1. PTE for all turbine units (EUs: A01/A03, A02/A04, A09 and 55301) shall be based on a consecutive 12-month total. Tons-per-year emission limits of each turbine unit include startup and shutdown emissions. *[NSR ATC Modification 6, Revision 3, Conditions IV-B-1(a) and (b) (04/16/09) and NSR ATC Modification 7, Conditions IV-B-1 and 2 (04/27/09)]*

Table III-B-1: Emission Unit PTE, Including Startup and Shutdowns (tons per year)

EU	PM _{2.5} /PM ₁₀	NO _x	CO	SO ₂	VOC
A01/A03 (Turbine Unit 5)	50.20	85.90	44.68	4.40	28.10
A02/A04 (Turbine Unit 6)	50.20	85.90	44.68	4.40	28.10
A09 (Turbine Unit 4)	19.21	39.06	33.94	1.22	3.47
53301 (Turbine Unit 3)	30.60	88.60	152.50	4.01	4.60

- b. The Permittee shall limit the actual and allowable emissions from each emission unit to the PTE listed in Table III-B-2. Pounds-per-hour limits are normal operation (exclude startup and shutdown) limits only. The hourly emission limits for NO_x and CO shall not be exceeded for any 1-hour rolling averaging period as determined by the CEMS as described in Section III-C. *[NSR ATC Modification 6, Revision 3, Conditions IV-B-1(a), (b) and (c) (04/16/09)]*

Table III-B-2: Emission Unit PTE, Excluding Startup and Shutdowns (pounds per hour)

EU	PM _{2.5} /PM ₁₀	NO _x	CO	VOC
A01/A03 (Turbine Unit 5)	11.50	15.40	9.50	6.40
A02/A04 (Turbine Unit 6)	11.50	15.40	9.50	6.40
A09 (Turbine Unit 4)	9.98	19.50	8.90	1.80
53301 (Turbine Unit 3)	10.00	28.80	49.70	1.50

- c. The Permittee shall limit the actual and allowable emissions from each emission unit to the PTE listed in Table III-B-3. These short-term emission limits are based on a 3-hour averaging period and represent normal operation (exclude startup and shutdown) limits only. *[NSR ATC Modification 6, Revision 3, Conditions IV-B-1(a) and (b) (04/16/09)]*

Table III-B-3: Emissions Limitations, Excluding Startup and Shutdown Emissions, for Turbine Units 5 and 6 (EUs: A01/A03 and A02/A04)¹

Mode	NO _x @ 15% O ₂	CO @ 15% O ₂	VOC @ 15% O ₂
With Duct Firing	2.0 ppmvd	2.0 ppmvd	2.9 ppmvd
Without Duct Firing	2.0 ppmvd	2.0 ppmvd	2.2 ppmvd

¹Limits based on a 3-hour averaging period.

- d. The Permittee shall limit the actual and allowable emissions from each emission unit to the PTE listed in Table III-B-4. The short-term emission limits are based on the averaging period as listed, with the table, and represent normal operation (exclude startup and shutdown) limits only. *[NSR ATC Modification 6, Revision 3, Conditions IV-B-1(a) and (b) (04/16/09)]*

Table III-B-4: Emission Limitations Excluding Startup and Shutdown

EU	NO _x @ 15% O ₂
53301 (Turbine Unit 3) ¹	9.0 ppmvd
A09 (Turbine Unit 4) ²	5.0 ppmvd

¹Limits based on a 3-hour averaging period.

²Limits based on a 1-hour averaging period.

- e. The Permittee shall limit the actual and allowable emissions from the emission unit to the PTE listed in Table III-B-5. *[NSR ATC Modification 7, Condition IV-B-2 (04/27/09)]*

Table III-B-5: Emission Limitations for Fire Pump (pounds per hour)

EU	Rating	PM ₁₀	CO	VOC and NO _x
A11	131kW, 175 hp	0.12 ¹	0.45 ¹	1.71 ¹

¹Emissions based on manufacturer's specifications.

- f. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. *[AQR 26.1.1]*

2. Operational Limits

- a. The Permittee shall limit the operation of each turbine unit and duct burner to the fuel limits listed in Table III-B-6: *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(a) (04/16/09)]*

Table III-B-6: Enforceable Fuel Limitations for Turbine Units

Equipment	Fuel Type	Max. Hourly MMBtu
Each of Turbine Units 5, 6 (A01, A02) ¹	Natural gas only	1,540 (Based on LHV)
Each Duct burner (A03, A04)	Natural gas only	173 (Based on LHV)
Turbine Unit 3 (53301)	Natural gas only	873.1 (Based on LHV)
Turbine Unit 4 (A09)	Natural gas only	1,060 (Based on HHV)

¹ Based on ambient pressure and 67 °F.

- b. The Permittee shall limit operation of Turbine Unit 3 (EU: 53301) to 20 hours per day and to 6,135 hours per year. *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(c) (04/16/09)]*
- c. The Permittee shall limit operation of Turbine Unit 4 (EU: A09) to 3,300 hours per year. *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(d) (04/16/09)]*
- d. The Permittee shall limit operation of each duct burner (EUs: A03 and A04) to 4,000 hours per year. Natural gas is the only fuel approved for use by these units. *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(e) (04/16/09)]*
- e. For Turbine Unit 3 (EU: 53301), startup shall be defined as the 60-minute period immediately following the commencement of fuel combustion. Shutdown means the period immediately preceding the cessation of firing of a turbine not to exceed 60 consecutive minutes. *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(f) (04/16/09)]*
- f. For Turbine Units 4, 5, and 6 (EUs: A09, A01, and A02), startup shall be defined as the period immediately following the commencement of fuel combustion not to exceed 180 minutes, except that for Turbine Units 5 and 6 (EUs: A01 and A02), a cold startup may extend beyond 180 minutes but shall not exceed 300 minutes. Shutdown means the period immediately preceding the cessation of firing of a turbine not to exceed 60 consecutive minutes. *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(g) (04/16/09)]*

- g. The Permittee shall limit the operation of each emergency generator (EUs: A07, A08, and 53302) 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 to generate income for the facility. *[40 CFR 63, Subpart ZZZZ (63.6640(f))]*
- h. The Permittee shall limit the operation of the emergency fire pump (EU: A11) 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. *[40 CFR 60, Subpart IIII (60.4211(f))]*

3. Emission Controls

Turbine Units 3, 4, 5, and 6

- a. At all times, including periods of startup, shutdown and malfunction, the Permittee shall, under all conditions, maintain and operate the source in a manner consistent with good air pollution control practice for minimizing emissions as required by 40 CFR 60.11. Determination of whether acceptable operating and maintenance procedures are being used shall be based on information available to the Control Officer which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(a) (04/16/09)]*
- b. The Permittee shall maintain and operate each SCR system on Turbine Units 5 and 6 and their associated duct burners (EUs: A01/A03 and A02/A04) in accordance with manufacturer's specifications. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(e) (04/16/09)]*
- c. The Permittee shall operate the SCR at all times the associated turbine unit is operating, excluding periods of startup and shutdown. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(e) (04/16/09)]*
- d. The Permittee shall operate each SCR system such that NO_x emissions do not exceed the limitations listed in Tables III-B-1, III-B-2, and III-B-3, excluding startups and shutdowns. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(f) (04/16/09)]*
- e. The Permittee shall control NO_x exhaust emissions from Turbine Unit 3 (EU: 53301) with the use of the General Electric DLN combustor, in accordance with manufacturer's specifications and good combustion practices. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(b) (04/16/09)]*
- f. The Permittee shall control NO_x exhaust emissions from Turbine Unit 4 (EU: A09) with the use of a ULN combustor, in accordance with manufacturer's specifications and good combustion practices. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(c) (04/16/09)]*
- g. The Permittee shall maintain and operate an oxidation catalyst downstream of any associated duct burners for the control of CO and VOCs on Turbine Units 4, 5 and 6 (EUs: A09, A01/A03, and A02/A04) in accordance with manufacturer's specifications. The catalysts shall be operated at all times the associated turbine unit is operating, excluding periods of startup and shutdown. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(g) (04/16/09)]*
- h. The Permittee shall operate each oxidizing catalyst such that CO and VOC emissions do not exceed limits listed in Tables III-B-1, III-B-2, and III-B-3 (EUs: A09, A01/A03, and A02/A04). *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(h) (04/16/09)]*
- i. The Permittee shall control SO₂ exhaust emissions from any turbine or duct burner by the exclusive use of pipeline quality natural gas and good combustion practices. Sulfur content of

natural gas fuel shall not exceed 0.5 grains per 100 scf. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(i) (04/16/09)]*

- j. The Permittee shall control PM₁₀ exhaust emissions from each turbine unit (EUs: 55301, A09, A01/A03, and A02/A04) by properly maintaining and periodically replacing inlet air filters preceding each turbine per manufacturer's specifications and good operating practices. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(j) (04/16/09)]*

Emergency Generators and Fire Pump

- k. The Permittee shall operate the diesel fire pump (EU: A11) with a turbocharger and aftercooler. *[NSR ATC Modification 7, Condition IV-D-1 (04/27/09)]*
- l. The Permittee shall only combust diesel fuel in the diesel fire pump with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35 percent by volume (EU: A11). *[40 CFR 60, Subpart IIII]*
- m. The Permittee shall combust in the emergency generators (EUs: A07, A08, and 55302) only low sulfur (<0.0015 percent sulfur by weight) diesel fuel. *[NSR ATC Modification 6, Revision 3, Conditions IV-B-2(h) and (i) (04/16/09)]*
- n. The Permittee shall maintain each emergency generator (EUs: A07, A08, and 53302) as follows: *[40 CFR 63.6640, Subpart ZZZZ]*
 - i. Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - ii. Inspect air cleaners every 1,000 hours of operation or annually, whichever comes first; and
 - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Other

- o. The Permittee shall operate the source in a manner such that odors will not cause a nuisance. *[AQR 43.1]*
- p. The Permittee shall 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. *[AQR 12.5.2.6(a)]*

C. Monitoring

1. This source is subject to 40 CFR 60 Subparts A, Db, GG, and IIII; 40 CFR 70; 40 CFR 63 Subpart ZZZZ; 40 CFR 72 (Acid Rain Permits); 40 CFR 73 (Acid Rain Sulfur Dioxide Allowance System); and 40 CFR 75 (Acid Rain CEMS). It is the Permittee's responsibility to know and comply with all requirements within the applicable parts of these federal regulations. *[AQR 14.1, AQR 21.1, AQR 22.1 and 40 CFR 60.1, 40 CFR 60.330, 40 CFR 70.3, 40 CFR 72.6, 40 CFR 73.2, and 40 CFR 75.2]*
2. To demonstrate continuous direct compliance with all emission limitations for NO_x and CO specified in Section III-B of this permit, the Permittee shall install, calibrate, maintain, operate, and certify CEMS for NO_x, CO, and O₂ or CO₂ on each turbine unit and its associated duct burner in accordance with 40 CFR 75 and 40 CFR 60, as applicable. Each CEMS shall include an automated data acquisition and handling system. Each system shall monitor and record at least the following data: *[40 CFR 75.53, Subpart F]*
 - a. exhaust gas concentrations (in ppm) of NO_x, CO, and diluent O₂ or CO₂ for all turbine units (EUs: 53301, A09, A01/A03, and A02/A04) at least once every 15 minutes when required by 40 CFR 60 or 40 CFR 75, as appropriate;
 - b. exhaust gas flow rate (by direct or indirect methods);

- c. fuel flow rate;
 - d. hours of operation;
 - e. 3-hour rolling averages of each NO_x and CO concentrations (in ppm) for Turbine Unit 3 (EU: 53301);
 - f. 1-hour rolling averages of each NO_x and CO concentrations (in ppm) for Turbine Unit 4 (EU: A09);
 - g. 3-hour rolling averages of each NO_x and CO concentrations (in ppm) for Turbine Units 5 and 6 and their associated duct burners (EUs: A01/A03 and A02/A04);
 - h. hourly and consecutive 12-month period accumulated mass emissions (in pounds) of NO_x and CO; and
 - i. hours of downtime of the CEMS.
3. All emissions recorded by the CEMS shall be reported in clock hour increments. Any clock hour that contains at least one minute of a startup event shall be considered a startup hour and any clock hour that contains at least one minute of a shutdown event shall be considered a shutdown hour. *[AQR 12.5.2.6(d)]*
 4. The Permittee shall maintain and adhere to the latest quality assurance plan, submitted to and approved by Air Quality that includes auditing schedules, reporting schedules, design specifications, and other quality assurance requirements for each CEMS. *[40 CFR 75]*
 5. The Permittee shall conduct periodic audit procedures and QA/QC procedures for CEMS conforming to the provisions of 40 CFR 60 Appendix F or 40 CFR 75 Appendix B, as applicable. *[AQR 12.5.2.6(d)]*
 6. The Permittee shall conduct RATA of the CO, NO_x, and diluents O₂ or CO₂ CEMS at least annually. *[AQR 12.5.2.6(d)]*
 7. The Permittee shall take corrective actions as described in Appendix B of 40 CFR 75 if an out-of-control period to a monitor or CEMS occurs. *[40 CFR 75.24]*
 8. The Permittee shall verify compliance with fuel gas sulfur content in accordance with 40 CFR 60.334(h). *[AQR 12.5.2.6(d) and 40 CFR 60.334(h)]*
 9. The Permittee shall operate the diesel emergency fire pump (EU: A11) 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. *[40 CFR 60.4209, Subpart IIII]*
 10. The Permittee shall operate the diesel emergency generators (EUs: A07, A08, and 53302) 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. *[40 CFR 63.6625, Subpart ZZZZ]*
 11. The Permittee shall perform at least one visual emissions check on a plant-wide level each calendar quarter. The quarterly visual checks shall include the diesel-fired emergency generators and fire pump (EUs: A07, A08, A11, and 53302) while operating, not necessarily simultaneously, to demonstrate compliance with the opacity limit. If any of the diesel-fired emergency generators or fire pump does not operate during the calendar quarter, then no observation of that unit shall be required. If visible emissions are observed, then corrective actions shall be taken to minimize the emissions and, if practicable, the opacity of emissions shall be visually determined in accordance with 40 CFR 60 Appendix A: Reference Method 9. *[AQR 12.5.2.6(d) and 40 CFR 70.6]*

D. Testing

Initial performance tests for Turbine Unit 3 were conducted in 1995. Initial performance tests for Turbine Unit 4 were conducted in 2006. Initial performance tests for Turbine Units 5 and 6 were completed on April 27, 2011.

1. Performance testing, when required, is subject to 40 CFR 60 Subpart A; 40 CFR 60, Subpart GG; and Air Quality's Guideline on Performance Testing. *[AQR 12.5.2.6(d) and 40 CFR 60.335]*
2. Pursuant to AQR Subsection 4.5, the Control Officer may require additional performance testing. *[AQR 4.5]*

E. Record Keeping

1. The Permittee shall maintain the following records on site for reporting: *[AQR 12.5.2.6(d)]*

Turbine Units (EUs: A01 through A04, A09, and 53301):

- a. the magnitude and duration of excess emissions, notifications, monitoring system performance, malfunctions, corrective actions taken, etc., as required by 40 CFR 60.7;
- b. time, duration, nature, and probable cause of any CEMS downtime and corrective actions taken;
- c. dates and hours of operation with monthly totals for each turbine and, as applicable, each duct burner (EUs: A01 through A04, A09, and 53301);
- d. monthly and consecutive 12-month period total quantity of emissions for all turbines in tons per year;
- e. hourly heat input to each turbine unit (turbine and duct burner);

IC Engines:

- f. monthly hours of operation for each emergency generator and fire pump for testing, maintenance; and nonemergency use;
 - g. date and duration of operation for each emergency generator and fire pump for emergency use, including documentation justifying use during the emergency; and
 - h. annual emissions (tons per year) of each generator and fire pump and the source.
2. The Permittee shall maintain records on site that include, at a minimum: *[AQR 12.5.2.6(d)]*
 - a. sulfur content of diesel fuel;
 - b. records of inspections and maintenance performed on the emergency generators;
 - c. sulfur content of natural gas as determined by Condition III-C-9;
 - d. dates, times, and duration of each startup and shutdown event for the turbine units;
 - e. each CEMS "out-of-control" period, as defined in 40 CFR 75, Appendix B;
 - f. CEMS audit results, RATA, corrective actions, etc., as required by 40 CFR 60 and the CEMS quality assurance plan;
 - g. log of visual emissions checks;
 - h. results of performance testing conducted;
 - i. certificates of representation for the designated representative and the alternate designated representative that meet all requirements of 40 CFR 72.24;
 - j. copies of all reports, compliance certifications, other submissions, and all records made or required under the Acid Rain Program;

- k. copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program;
 - l. all CEMS information required by the CEMS monitoring plan as specified in 40 CFR 75 Subpart F; and
 - m. manufacturer's specifications for turbine units and oxidation catalyst.
3. For all inspections, visible emission checks, and testing required under monitoring, logs, reports, and records shall include at least the date and time, the name of the person performing the action, the results or findings, and the type of corrective action taken (if required). [AQR 12.5.2.6(d)]
 4. Records and data required by this operating permit to be maintained by Permittee may, at the Permittee's expense, be audited at any time by a third party selected by the Control Officer. [AQR 4.4]
 5. All records and logs, or a copy thereof, shall be kept on-site for a minimum of five (5) years from the date the measurement was taken or data was entered and shall be made available to Air Quality upon request. [AQR 12.5.2.6(d)]
 6. The Control Officer reserves the right to require additional requirements concerning records and record keeping for this source. [AQR 12.5.2.6(d)]

F. Reporting

1. The Permittee shall submit semiannual reports to the Control Officer. [AQR 12.5.2.6(d)]
2. All report submissions shall be addressed to the attention of the Control Officer. [AQR 14, AQR 21.4 and AQR 22.4]
3. The following requirements apply to semiannual reports: [AQR 12.5.2.6(d)]
 - a. The report shall include a summary of each item listed in Condition III-E-1; and
 - b. The report shall be submitted to the Control Officer within 30 calendar days after the end of the reporting period.
4. Regardless of the date of issuance of this Operating Permit, the source shall comply with the schedule for report submissions outlined in Table III-F-1: [AQR 12.5.2.6(d)]

Table III-F-1: Required Report Submission Dates

Required Report	Applicable Period	Due Date ¹
Semiannual Report for 1 st Six-Month Period	January, February, March, April, May, June	July 30 each year
Semiannual Report for 2 nd Six-Month Period. Any additional annual records required.	July, August, September, October, November, December	January 30 each year
Annual Compliance Certification Report	Calendar Year	January 30 each year

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

¹If 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.

5. The designated representative or alternate designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 72, 40 CFR 73, and 40 CFR 75. [40 CFR 72.9(f)]
6. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit conditions, permit requirements, and requirements of applicable federal regulations. [AQR 4.4 and AQR 12.5.2.6(d)(4)]

G. Mitigation

1. No federal offset requirements have been identified. [AQR 12.7]

IV. ACID RAIN REQUIREMENTS

1. In accordance with the provisions of Title IV of the Clean Air Act and 40 C.F.R. Parts 72 through 77, this Acid Rain Permit is issued to Nevada Power Harry Allen Station, Apex Dry Lake Industrial Park, Clark County Nevada.
2. All terms and conditions of the permit are enforceable by Air Quality and EPA under the Clean Air Act. [40 CFR 72]
3. The Permittee shall comply with all the applicable requirements of the Acid Rain Permit Application located in Attachment 2. [40 CFR 72.30]
4. This Acid Rain permit incorporates the definitions of terms in 40 CFR Part 72.2.
5. This permit is valid for a term of five (5) years from the date of issuance unless a timely and complete renewal application is submitted to Air Quality. [40 CFR 72.69]
6. A timely renewal application is an application that is received at least six months prior to the permit expiration date. [40 CFR 72.30]
7. Emissions from this source shall not exceed any allowances that the source lawfully holds under Title IV of the Act or its regulations. [40 CFR 70.6(a)(4)]

V. OTHER REQUIREMENTS

1. The Permittee shall not use, sell, or offer for sale any fluid as a substitute material for any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator freezer unit, or other cooling or heating device designated to use a CFC or HCFC compound as a working fluid, unless such fluid has been approved for sale in such use by the Administrator. The Permittee shall keep record of all paperwork relevant to the applicable requirements of 40 CFR 82 on site. [40 CFR 82]

VI. PERMIT SHIELD

1. Compliance with the terms contained in this permit shall be deemed compliance with the following applicable requirements in effect on the date of permit issuance: [AQR 12.5.2.9]

Table VI-1: Applicable Requirements Related to Permit Shield

Citation	Title
AQR Section 4	Control Officer
AQR Section 12.4	ATC Application and Permit Requirements for Part 70 Sources
AQR Section 12.9	Annual Emissions Inventory Requirement
AQR Section 12.10	Continuous Monitoring Requirements for Stationary Sources
AQR Section 14.1 Subpart A	NSPS General Provisions
AQR Section 18	Permit and Technical Service Fees
AQR Section 21	Acid Rain Permits
AQR Section 22	Acid Rain Continuous Emission Monitoring
AQR Section 25	Affirmative Defense for Excess Emissions due to Malfunctions, Startup, and Shutdown
AQR Section 26	Emission of Visible Air Contaminants
AQR Section 27	Particulate Matter from Process Weight
AQR Section 28	Fuel Burning Equipment
AQR Section 40	Prohibitions of Nuisance Conditions
AQR Section 41	Fugitive Dust
AQR Section 42	Open Burning
AQR Section 43	Odors in the Ambient Air
AQR Section 70	Emergency Procedures
AQR Section 94	Permitting and Dust Control for Construction Activities
40 CFR Part 52.1470	SIP Rules
40 CFR 60 Subpart A	NSPS – General Provisions
40 CFR 60 Subpart Db	NSPS – Industrial-Commercial-Institutional Steam Generating Units
40 CFR 60 Subpart IIII	NSPS – Stationary Compression Ignition Internal Combustion Engines
40 CFR 63 Subpart ZZZZ	NESHAP – Stationary Reciprocating Internal Combustion Engines
40 CFR 64	Compliance Assurance Monitoring
40 CFR 68	Chemical Accident Prevention Provisions
CFR 60.332(a)(1) [Subpart GG]	NSPS – Stationary Combustion Turbines (Standard for Nitrogen Oxides)
CFR 60.333 [Subpart GG]	NSPS – Stationary Combustion Turbines (Standard for Sulfur Dioxide)
CFR 60.334(c) [Subpart GG]	NSPS – Stationary Combustion Turbines (Monitoring of Operations)
CFR 60.335 [Subpart GG]	NSPS – Stationary Combustion Turbines (Test Methods and Procedures)
CFR 60.335(b) [Subpart GG]	NSPS – Stationary Combustion Turbines (Test Methods and Procedures)

ATTACHMENT 1
APPLICABLE REGULATIONS

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE:

1. Applicable AQR Sections:

Citation	Title
AQR Section 0	Definitions
AQR Section 4	Control Officer
AQR Section 5	Interference with Control Officer
AQR Section 8	Persons Liable for Penalties – Punishment: Defense
AQR Section 9	Civil Penalties
AQR Section 10	Compliance Schedule
AQR Section 12.2	Permit Requirements For Major Sources in Attainment Areas
AQR Section 12.3	Permit Requirements For Major Sources in Nonattainment Areas
AQR Section 12.4	Authority to Construct Application and Permit Requirements for Part 70 Sources
AQR Section 12.5	Part 70 Operating Permit Requirements
AQR Section 13	National Emission Standards for Hazardous Air Pollutants
AQR Section 14	New Source Performance Standards
AQR Section 18	Permit and Technical Service Fees
AQR Section 21	Acid Rain Continuous Emissions Monitoring
AQR Section 22	Acid Rain Permits
AQR Section 25	Upset/Breakdown, Malfunctions
AQR Section 26	Emissions of Visible Air Contaminants
AQR Section 28	Fuel Burning Equipment
AQR Section 40	Prohibition of Nuisance Conditions
AQR Section 41	Fugitive Dust
AQR Section 42	Open Burning
AQR Section 43	Odors in the Ambient Air
AQR Section 70	Emergency Procedures
AQR Section 80	Circumvention

2. NRS, Chapter 445B.
3. CAAA, Authority: 42 U.S.C. § 7401, et seq.
4. Applicable 40 CFR Subsections:

Citation	Title
40 CFR 52.21	Prevention of Significant Deterioration (PSD)
40 CFR 52.1470	SIP Rules
40 CFR 60, Subpart A	Standards of Performance for New Stationary Sources (NSPS) – General Provisions
40 CFR 60, Subpart Db	Subpart Db-Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
40 CFR 60, Subpart GG	Standards of Performance for New Stationary Sources (NSPS) – Stationary Gas Turbines
40 CFR 60	Appendix A, Method 9 or equivalent, (Opacity)
40 CFR 60, Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
40 CFR 63, Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines

Citation	Title
40 CFR 70	Federally Mandated Operating Permits
40 CFR 72	Acid Rain Permits Regulation
40 CFR 73	Acid Rain Sulfur Dioxide Allowance System
40 CFR 75	Acid Rain Continuous Emission Monitoring
40 CFR 82	Protection of Stratospheric Ozone

Acid Rain - Page 2

Facility (Source) Name (from STEP 1) Harry Allen Station

Permit Requirements**STEP 3**

Read the standard requirements.

- (1) The designated representative of each affected source and each affected unit at the source shall:
- (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
- (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (ii) Have an Acid Rain Permit.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
- (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
- (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

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Facility (Source) Name (from STEP 1) Harry Allen Station

Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.

(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.

(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

(1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.

(2) The owners and operators of an affected source that has excess emissions in any calendar year shall:

(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and

(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:

(i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

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Facility (Source) Name (from STEP 1) Harry Allen Station

Recordkeeping and Reporting Requirements, Cont'd.**STEP 3, Cont'd.**

- (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating

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Facility (Source) Name (from STEP 1) **Harry Allen Station**

Effect on Other Authorities, Cont'd.

STEP 3, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a source can hold; *provided*, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

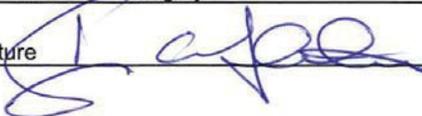
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

STEP 4
Read the certification statement, sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Kevin C. Geraghty	
Signature 	Date 8/5/14