

PRIOR NOTIFICATION FORM

Date: October 24,2016

Requester: Don Hopper

Source Name: Chuck Lenzie Generating Station

Source ID (if applicable): 01513

Outstanding Balance (if applicable): 0

Action Needed:

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

Comments:

NVEnergy would like to use a temporary portable diesel engine at Chuck Lenzie Generating Station for the purpose of transferring pond water for dust control applications at Faraday Future construction site. A John Deere 4045TF, 74 horsepower (hp) engine will be used to transfer water from the upper pond to the lower pond. This proposed engine is in addition to the engine described in the August 19, 2016 letter for transferring water from the lower pond. The engine is estimated to operate no longer than 1,500 hours in a worst-case scenario. NVE will report the hours of operation for this portable engine in the next semi-annual report, and will report the emissions in the annual emission inventory.

The decision to allow the operation of the engine in addition to the previously accepted engine, is taken based on the insignificant impact of the units in the total PTE of the stationary source. The matter was discussed internally with the Compliance Manager.

Santosh Mathew

Manager's Approval:



Date: 10/31/2016



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CC-DAQ

2016 OCT 24 P 12:54

October 20, 2016

Mr. Richard Beckstead
Mr. Gary Miller
Clark County Department of Air Quality
4701 W. Russell Road, Suite 200
Las Vegas, NV 89118

RE: Use of Temporary Diesel Water Pump Chuck Lenzie Generating Station (Part 70 Operating Permit Source #1513)

Dear Messrs. Beckstead and Miller:

Nevada Energy (NVEnergy) would like to notify you of the use of a temporary portable diesel engine at Chuck Lenzie Generating Station for the purpose of transferring pond water for dust control applications. A second John Deere 4045TF, 74 horsepower (hp) engine will be used to transfer water from the upper pond to the lower pond, water will continue to be transfer to Faraday from the lower pond as described in the August 19, 2016 letter.. The engine is estimated to operate no longer than 500 hours in a worst-case scenario. This is in support of construction activities for the Faraday Future project, to provide dust suppression for its ongoing construction activities. The potential to emit (PTE) is estimated based on this worst-case scenario. The detailed emission calculations are included in Attachment 1. The manufacturers' specifications and emission data sheet for the portable engine are included in Attachment 2. NVE will also report the hours of operation for these portable engines in the next semi-annual report, and will report the emissions in the annual emission inventory.

Please feel free to call David Rudolph at (702) 402-8286 or George Brewer (702) 239-8801 should you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "James D. Hopper".

Don Hopper
Regional Director
NV Energy

ATTACHMENT 1

Detailed Emission Calculations

John Deere 74Hp Emissions Evaluation

EPA Tier IV

Emission Factors

Basis: Manufacturer's Emissions Data Sheet

Maximum Power Output Capacity (BHP)

Equivalent KW

Proposed Operating Hours for the Project

Maximum Fuel Usage (gal/hr)

No. 2 Diesel Fuel Density (lb/gal)

74

55

500

2.30

7.26

Basis

Manufacturer specifications

Worst-case operating hours while the unit being onsite

Manufacturer specifications

MSDS

Criteria Pollutant Emission Factors:

Pollutant	Emission Factor	Units
NO _x	4.70	g/kw-hr
CO	5.00	g/kw-hr
SO ₂ ^b	15	ppm
PM ₁₀	0.30	g/kw-hr
VOC	1.12	g/hp-hr

Criteria Pollutant Emissions Estimates:

Pollutant	(lb/hr) ^c	Portable Unit PTE (tons/period) ^d
NO _x	0.57	0.14
CO	0.61	0.15
SO ₂	0.001	1.25E-04
PM ₁₀	0.04	0.009
VOC	0.18	0.05
HAP	see below	2.96E-04

Hazardous Air Pollutant (HAP) Potential Emissions:

Pollutant	Emission Factor (lb/MMBtu) ^e	RTE ^f	
		(lb/hr)	(tons/period) ^g
HAPs:			
Acetaldehyde	7.67E-04	2.34E-04	5.86E-05
Acrolein	9.25E-05	2.82E-05	7.06E-06
Benzene	9.33E-04	2.85E-04	7.12E-05
1,3-Butadiene	3.91E-05	1.19E-05	2.99E-06
Formaldehyde	1.18E-03	3.60E-04	9.01E-05
Toluene	4.09E-04	1.25E-04	3.12E-05
Xylenes	2.85E-04	8.70E-05	2.18E-05
Polycyclic Organic Matter:			
PAH	1.68E-04	5.13E-05	1.28E-05
Total HAP		1.18E-03	2.96E-04

^a Emission factors for all pollutants, except VOC and SO₂, are based on manufacturer specifications. VOC emission factor is derived from AP-42 Table 3.3-
^b The maximum S content of the Number 2 Diesel Fuel will be 15 ppm. SO₂ emissions are estimated by assuming stoichiometric conversion of 100% S in
^c Hourly Emissions Rate (lb/hr) for all criteria pollutants except SO₂ = Emission Factor (g/hp-hr) x Power Rating of Engine (hp)/453.6 (g/lb), SO₂ Hourly
Emissions (tons/period) = (lb/hr)_{Emissions} x (Proposed Operating Hours) x (1 ton/2000 lb).
^d Emission factors from AP-42 Section 3.3, Table 3.3-2 "Speciated Emission Factors for Uncontrolled Diesel Engines," Supplement F, August 2000.
^e Hourly Emissions Rate (lb/hr) = Fuel Consumption Rate (gal/hr) x Density of Diesel Fuel (lb/gal) x Average Btu value of diesel fuel (Btu/lb) x (1
MMBtu/1 e6 Btu) x HAP Emission Factor (lb/MMBtu)

ATTACHMENT 2

Manufacturer's Data Sheets for the Portable Pumps

High Head Pump

HH80c

Overview:

The 3" suction x 3" discharge self-priming centrifugal HH80c high head pump provides up to a maximum of 450 gallons per minute pumping and up to 360 feet of head. This pump is usually mounted on a trailer and features the standard PowerPrime Clean Prime Venturi priming system which allows it to run continuously, unattended and even run dry.

Features:

- Suction lift to 28 feet
- Continuous self-priming
- Runs dry unattended
- 12-volt auto start electric control panel
- SAE-Mounted
- Flex coupled to diesel engine
- 24-hour capacity fuel tank
- Compressor/venturi automatic priming system
- Ductile iron volute with stainless steel impellers
- Replaceable wear plates

Specs:

Maximum Flow	450 GPM
Maximum Head	360 feet
Pump Size	3" x 3"
Maximum Solids Handling	1 inch
Dry weight	3,660 lbs.
Footprint: Trailer mounted model	135" x 66"
Fuel tank	120 gallon
Fuel consumption	2.3 gph @ 2,200 RPM



Accessories:

- Spillguard
- Suction and Discharge Hoses
- Fuel Nurse Tank
- VFD for electric driven models



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CURVE: 01-0133-02-81

PUMP : HH-80C

SUCTION
4"

DISCHARGE
3"

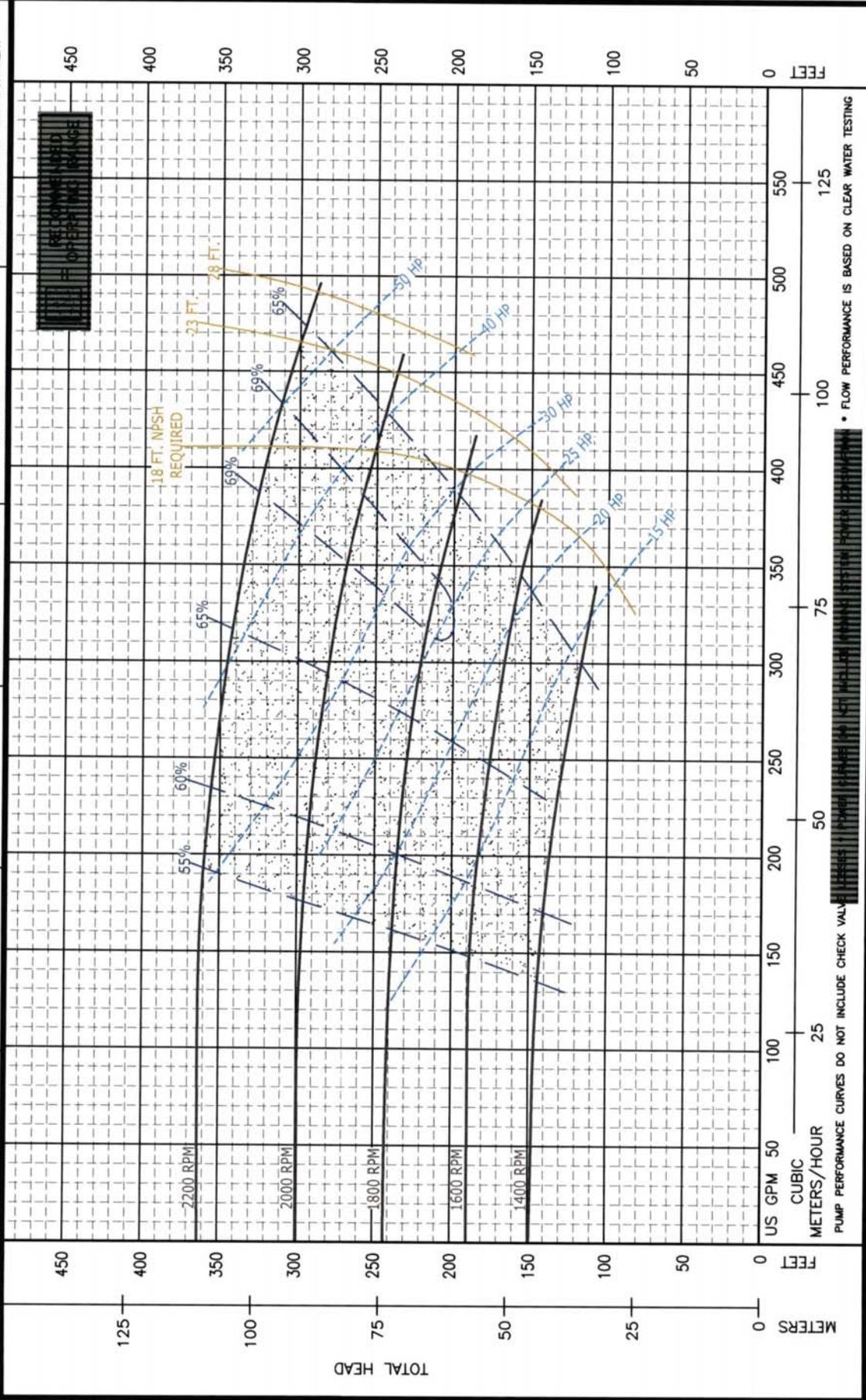
MAX. SPHERE
0.41"

IMPELLER
7 VANE

IMPELLER
14"

IMPELLER &
WEAR RINGS
BRASS

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RECOMMENDED OPERATING RANGE

18 FT. NPSH REQUIRED

23 FT.

28 FT.

50 HP

40 HP

30 HP

25 HP

20 HP

15 HP

65%

69%

65%

60%

55%

US GPM 50 100 150 200 250 300 350 400 450 500 550

METERS PER HOUR 25 50 75 100 125

FEET 0 50 100 150 200 250 300 350 400 450

METERS 0 25 50 75 100 125

• FLOW PERFORMANCE IS BASED ON CLEAR WATER TESTING

 AIR RESOURCES BOARD	JOHN DEERE POWER SYSTEMS	EXECUTIVE ORDER U-R-004-0444
		New Off-Road Compression-Ignition Engines

Pursuant to the authority vested in the Air Resources Board by Sections 43013, 43018, 43101, 43102, 43104 and 43105 of the Health and Safety Code; and

Pursuant to the authority vested in the undersigned by Sections 39515 and 39516 of the Health and Safety Code and Executive Order G-02-003;

IT IS ORDERED AND RESOLVED: That the following compression-ignition engines and emission control systems produced by the manufacturer are certified as described below for use in off-road equipment. Production engines shall be in all material respects the same as those for which certification is granted.

MODEL YEAR	ENGINE FAMILY	DISPLACEMENT (liters)	FUEL TYPE	USEFUL LIFE (hours)
2012	CJDXL04.5130	4.5	Diesel	8000
SPECIAL FEATURES & EMISSION CONTROL SYSTEMS			TYPICAL EQUIPMENT APPLICATION	
Direct Diesel Injection, Turbocharger			Pump, Compressor, Generator Set, Other Industrial Equipment	

The engine models and codes are attached.

The following are the exhaust certification standards (STD), or family emission limit(s) (FEL) as applicable, and certification levels (CERT) for hydrocarbon (HC), oxides of nitrogen (NOx), or non-methane hydrocarbon plus oxides of nitrogen (NMHC+NOx), carbon monoxide (CO), and particulate matter (PM) in grams per kilowatt-hour (g/kw-hr), and the opacity-of-smoke certification standards and certification levels in percent (%) during acceleration (Accel), lugging (Lug), and the peak value from either mode (Peak) for this engine family (Title 13, California Code of Regulations, (13 CCR) Section 2423):

RATED POWER CLASS	EMISSION STANDARD CATEGORY		EXHAUST (g/kw-hr)					OPACITY (%)		
			HC	NOx	NMHC+NOx	CO	PM	ACCEL	LUG	PEAK
37 ≤ kW < 56	Tier 4 Interim	STD	N/A	N/A	4.7	5.0	0.30	20	15	50
		CERT	--	--	4.6	1.2	0.29	2	1	4

BE IT FURTHER RESOLVED: That for the listed engine models, the manufacturer has submitted the information and materials to demonstrate certification compliance with 13 CCR Section 2424 (emission control labels), and 13 CCR Sections 2425 and 2426 (emission control system warranty).

Engines certified under this Executive Order must conform to all applicable California emission regulations.

This Executive Order is only granted to the engine family and model-year listed above. Engines in this family that are produced for any other model-year are not covered by this Executive Order.

Executed at El Monte, California on this 20 day of September 2011.


 Annette Hebert, Chief
 Mobile Source Operations Division

8-11-2011

OFF: M-K-UP4-UTTY

11/10/2011

page 1 of 1

Engine Model Summary Form

Manufacturer: John Deere Power Systems
 Engine category: Nonroad CI
 EPA Engine Family: C-JDXL04.6130
 Mfr Family Name: 360TAC
 Process Code: Correction

1. Engine code	2. Engine Model	3. kW@RPM (SAE Gross)	4. Fuel Rate: mm/stroke@peak kW (for diesel only)	5. Fuel Rate: (kg/hr)@peak kW (for diesels only)	6. Torque (Nm) @RPM (SEA Gross)	7. Fuel Rate: mm/stroke@peak torque	8. Fuel Rate: (kg/hr)@peak torque	9. Emission Control Device Per SAE J1930
4045TF290A	4045T	55.0@2400	59.7@2400	14.61@2400	288@1700	66.4@1700	11.51@1700	EM DFI TC
4045TF290B	4045T	55.0@1800	73@1800	13.4@1800				EM DFI TC
4045TF290C	4045T	55.0@2350	59.2@2350	14.18@2350				EM DFI TC
4045TF290D	4045T	55.0@2100	63@2100	13.49@2100				EM DFI TC
4045TF290E	4045T	48.0@1760	64.1@1760	11.51@1760				EM DFI TC
4045TF290F	4045T	36.0@2350	39.8@2350	9.54@2350				EM DFI TC
4045TF290G	4045T	36.0@2100	41.3@2100	8.85@2100				EM DFI TC
4045TF290H	4045T	36.0@1760	48.1@1760	8.63@1760				EM DFI TC

CLARK COUNTY
DEPARTMENT OF AIR QUALITY
4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118
Part 70 Operating Permit
Source: 1513
Issued in accordance with the
Clark County Air Quality Regulations (AQR)

**ISSUED TO: Nevada Power Company, dba NV Energy,
Chuck Lenzie Generating Station**

SOURCE LOCATION:
13605 Chuck Lenzie Court
Las Vegas, Nevada 89165
T18S, R63E, Section 15
Hydrographic Basin Number: 216

COMPANY ADDRESS:
6226 West Sahara Avenue, MS#30
Las Vegas, Nevada 89146

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

RESPONSIBLE OFFICIAL:
Name: Kevin Geraghty
Title: Vice President, Power Generation
Phone: (702) 402-5662
Fax Number: (702) 402-0835

Permit Issuance Date: August 12, 2015

Expiration Date: August 11, 2020

ISSUED BY: CLARK COUNTY DEPARTMENT OF AIR QUALITY



Lewis Wallenmeyer
Director, Department of Air Quality

EXECUTIVE SUMMARY

Chuck Lenzie Generating Station (Chuck Lenzie) is an electrical power generating station located at Apex Dry Lake Industrial Park. The legal description of the source location is as follows: Eastern portion of T18S, R63E, Section 15 in Apex Valley, County of Clark, State of Nevada. Chuck Lenzie Generating Station is situated in hydrographic area 216 (Garnet Valley). Garnet Valley is designated as attainment for all pollutants.

Chuck Lenzie is a Categorical Stationary Source, as defined by AQR 12.2.2(j)(1). Chuck Lenzie is a major stationary source for PM₁₀, PM_{2.5}, NO_x, CO and VOC and is minor source for SO₂ and HAP. The Chuck Lenzie is a source of GHG. The Chuck Lenzie operates four, GE frame 7, gas-fired CTGs, four duct-fired HRSGs, two steam turbine generators, two auxiliary 44 MMBtu/hr boilers, two diesel emergency generators, one diesel fire pump, six cooling towers with 4 cells each and associated ancillary equipment. This Part 70 Operating Permit is issued based on the Title V application submitted on July 24, 2006, the Title V Revision application submitted on March 14, 2007, the ATC application submitted on January 20, 2009, the Part 70 Operating Permit issued October 20, 2009 and the Title V Renewal application submitted on April 4, 2014.

The following table summarizes the source potential to emit for each regulated air pollutant:

Source-Wide PTE (tons per year)¹

Pollutants	PM₁₀	PM_{2.5}	NO_x	CO	SO₂	VOC	GHG²
PTE Totals	502.70	502.70	552.95	1,441.02	86.70	203.81	5,018,325
Major Source Thresholds (Categorical)	100	100	100	100	100	100	-

¹ Not a source-wide emission limit; values are used for determining the major source status.

² GHG is expressed as CO₂e for information only.

Pursuant to AQR 12.5.2.6(b), all terms and conditions in Sections II through VI and Attachments 1 and 2 in this permit are federally enforceable unless explicitly denoted otherwise.

This renewal of the Part 70 Operating Permit addresses specific minor corrections and changes as specified in the TSD.

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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
EPA	United States Environmental Protection Agency
EU	Emission Unit
GHG	Greenhouse Gasses
HAP	Hazardous Air Pollutant
HCFC	Hydrochlorofluorocarbon
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
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
scf	Standard Cubic Feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
S/N	Serial Number
SO ₂	Sulfur Oxides
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 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)]*
6. 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.
7. 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]*
8. 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, without resulting in a reduction in the total release of air contaminants to the atmosphere reduces or conceals an emission which would otherwise constitute a violation of an applicable requirement. [AQR 80.1]
 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 Operatomg Permit until final action is taken on its application for a renewed 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 to the Control Officer 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 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, if applicable, for all demolition and renovation projects. [AQR 13.1(b)(8)]
5. The Permittee shall certify compliance with terms and conditions contained in the Part 70 Operating Permit, 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 on January 30th of the following year and shall include 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 shall also 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 methods 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, 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 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 report shall be communicated 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, the detailed written report 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. *[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 Operating Permit is defined to consist of the emission units and associated appurtenances summarized in Table III-A-1. [NSR ATC Modification 1, Revision 4, Section IV-A (05/13/09), April 4, 2014 Renewal Application and AQR 12.5.2.14(a)]

Table III-A-1: List of Emission Units

EU	Description	Rating	Make	Model Number	Serial Number
A01	Unit #1, CTG electric turbine generator, natural gas	Nominal rating:168 MW (292 MW with supplemental duct firing);	General Electric	7FA (7241 FA+e)	297756
A02	Duct-fired HRSG for Unit #1	2,298 MMBtu/hr			102105
A03	Unit #2, CTG electric turbine generator, natural gas	Nominal rating:168 MW (292 MW with supplemental duct firing);	General Electric	7FA (7241 FA+e)	297757
A04	Duct-fired HRSG for Unit #2	2,298 MMBtu/hr			102106
A05	Unit #3, CTG electric turbine generator, natural gas	Nominal rating:168 MW (292 MW with supplemental duct firing);	General Electric	7FA (7241 FA+e)	297758
A06	Duct-fired HRSG for Unit #3	2,298 MMBtu/hr			102107
A07	Unit #4, CTG electric turbine generator, natural gas	Nominal rating:168 MW (292 MW with supplemental duct firing);	General Electric	7FA (7241 FA+e)	297759
A08	Duct-fired HRSG for Unit #4	2,298 MMBtu/hr			102108
A09	Auxiliary boiler	44.1 MMBtu/hr	Cleaver Brooks	CB1700750200	OL101697
A10	Auxiliary boiler	44.1 MMBtu/hr	Cleaver Brooks	CB1700750200	OL101698
A12	Emergency generator, diesel	600 kW	Caterpillar	3412	3FZ03533
A13	Emergency generator, diesel	600 kW	Caterpillar	3412	3FZ03528

EU	Description	Rating	Make	Model Number	Serial Number
A14	Diesel fire pump	None	Clarke	JDFP-06WA	101120-003-01-01 FTA 100-EL12N- A-AD-AM-AN-EE- J-T-X
A16	Gas line preheater	9.8 MMBtu/hr	NATCO	None	EL2F38803-01
A19	Chiller Cooling Tower, 4 cells	9,834 gpm each	Baltimore Aircoil	33985A-V-4	U02521301
A20	Chiller Cooling Tower, 4 cells	9,834 gpm each	Baltimore Aircoil	33985A-V-4	U02521302
A21	Chiller Cooling Tower, 4 cells	9,834 gpm each	Baltimore Aircoil	33985A-V-4	U02521303
A22	Chiller Cooling Tower, 4 cells	9,834 gpm each	Baltimore Aircoil	33985A-V-4	U025215401
A23	Chiller Cooling Tower, 4 cells	9,834 gpm each	Baltimore Aircoil	33985A-V-4	U025215402
A24	Chiller Cooling Tower, 4 cells	9,834 gpm each	Baltimore Aircoil	33985A-V-4	U025215403

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

One 350-gallon diesel storage tank for diesel fire pump
Two 800-gallon diesel storage tanks for emergency generators
Numerous lube oil sumps and vents
Two ammonia storage tanks, M/N: none, S/N: DKT02-1210 and DKT02-1211; sealed systems
Two, 2-celled, wet-surface air coolers, 5,040 gpm each cell, Niagara Blower Company, M/N: RWC38748-2F16, S/N: none
Station Maintenance Activities
Maintenance Shop Activities
Steam Cleaning Operations
Lime Silo with Filter
Soda Ash Silo with Filter

B. Emission Limitations and Standards**1. Emission Limits**

- a. The Permittee shall not allow the actual emissions from each emission unit to exceed the PTE listed in Table III-B-1 for any consecutive 12-month period. Ton-per-year emission limits of each emission unit include startup and shutdown emissions. *[NSR ATC Modification 1, Revision 4, Condition IV-B-1(a) (05/13/09) and AQR 12.5.2.14(a)]*

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

EU	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC
A01/A02 ¹	123.73	123.73	126.80	349.25	20.93	49.45
A03/A04 ¹	123.73	123.73	126.80	349.25	20.93	49.45
A05/A06 ¹	123.73	123.73	126.80	349.25	20.93	49.45

EU	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC
A07/A08 ¹	123.73	123.73	126.80	349.25	20.93	49.45
A09 ²	1.20	1.20	15.60	19.20	1.20	2.40
A10 ²	1.20	1.20	15.60	19.20	1.20	2.40
A16	0.39	0.39	5.14	3.10	0.39	0.78
A19-24	4.50	4.50	0	0	0	0

¹ Based on 0.75 grains sulfur per 100 scf of natural gas.

² Maximum operation based upon 6,000 hours per year.

- b. The Permittee shall not allow the actual emissions from each emission unit to exceed the PTE listed in Tables III-B-2. Pound-per-hour limits are normal operation (exclude startup and shutdown) limits only [NSR ATC Modification 1, Revision 4, Condition IV-B-1(a) (05/13/09) and AQR 12.5.2.14(a)]

Table III-B-2: Emission Unit PTE, Excluding Startup and Shutdowns (pounds per hour)¹

EU	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC
A01/A02 ²	28.25	28.25	28.95	79.74	4.78	11.29
A03/A04 ²	28.25	28.25	28.95	79.74	4.78	11.29
A05/A06 ²	28.25	28.25	28.95	79.74	4.78	11.29
A07/A08 ²	28.25	28.25	28.95	79.74	4.78	11.29
A09			5.20	6.40		
A10			5.20	6.40		
A16			1.17	0.71		

¹ Based on 0.75 grains sulfur per 100 standard cubic feet of natural gas.

² Pound-per-hour limitations do not apply to any clock hour that contains at least one (1) minute of startup or shutdown event.

- c. The Permittee shall not allow the actual emissions from each emission unit to exceed the PTE listed in Tables III-B-3. The ppm limits in the table are normal operation (exclude startup and shutdown) limits only [NSR ATC Modification 1, Revision 4, Condition IV-B-1(a) (05/13/09) and AQR 12.5.2.14(a)]

Table III-B-3: Emission Rates Excluding Startup and Shutdown (ppmvd)¹

EU	Description	NO _x	CO	VOC
A01 ²	Turbine Unit #1 with or without duct-firing	3.0	10	7.0
A03 ²	Turbine Unit #2 with or without duct-firing	3.0	10	7.0
A05 ²	Turbine Unit #3 with or without duct-firing	3.0	10	7.0
A07 ²	Turbine Unit #4 with or without duct-firing	3.0	10	7.0
A09 ³	Auxiliary 44.1 MMBtu/hr boiler	30	100	
A10 ³	Auxiliary 44.1 MMBtu/hr boiler;	30	100	

¹ Emission limits do not apply to any clock hour that contains at least one minute of a startup or shutdown event.

² Limits based on a 3-hour averaging period @ 15% O₂.

³ Limits based on a 1-hour averaging period @ 3% O₂.

- d. 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. [NSR ATC Modification 1, Revision 4, Condition IV-B-1(b) (05/13/09) and AQR 26.1.1]

2. Operational Limits

Turbine Units 1 through 4 (EUs: A01 through A08)

- a. The Permittee shall limit the total annual startup and shutdown hours per turbine to 876 hours. Startup/shutdown emissions must be reported as recorded by CEMS. [NSR ATC Modification 1, Revision 4, Condition IV-B-2(a) (05/13/09)]

- b. Startup events shall not exceed 120 minutes for a hot start, which occurs when the turbine has been out of Mode 6 operation for less than eight (8) hours; 180 minutes for a warm start, which occurs when the turbine has been out of Mode 6 operation between eight (8) and 72 hours; and 300 minutes for a cold start, which occurs when a turbine has been out of Mode 6 operation more than 72 hours. Startup is defined as the time immediately following firing until Mode 6 operations are reached or the turbine is shut down, whichever comes first. Mode 6 firing configuration is considered normal operation for GE Frame 7FA turbines. *[NSR ATC Modification 1, Revision 4, Condition IV-B-2(b) (05/13/09)]*
- c. A shutdown is defined as the one (1) hour period immediately preceding the cessation of firing of the gas turbine and shall not exceed 60 minutes. *[NSR ATC Modification 1, Revision 4, Condition IV-B-2(c) (05/13/09)]*
- d. The Permittee shall limit operation of each turbine/duct burner combination to 3,205 MMBtu/hr heat input on a LHV. *[NSR ATC Modification 1, Revision 4, Condition IV-B-2(d) (05/13/09)]*
- e. The Permittee shall limit natural gas fuel flow rate for the combined four (4) turbine units and associated duct burners to 421,336 pounds per hour. *[NSR ATC Modification 1, Revision 4, Condition IV-B-2(e) (05/13/09)]*

Other Emission Units

- f. The Permittee shall limit operation of each 44.1 MMBtu/hr boiler (EUs: A09 and A10) to 6,000 hours per year any consecutive 12-months basis and shall burn only natural gas as fuel. *[NSR ATC Modification 1, Revision 4, Condition IV-B-2(g) (05/13/09)]*
- g. The Permittee shall limit operation of each emergency diesel generator (EUs: A12 and A13) to 100 hours per year for testing and maintenance purposes only. 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, except as provided in 40 CFR 63.6640(f)(4). The emergency generators shall burn only low sulfur (less than 0.05 percent) diesel fuel. *[40 CFR 63.6640(f) and NSR ATC Modification 1, Revision 4, Condition IV-B-2(h) (05/13/09)]*
- h. The Permittee shall limit operation of the diesel fire pump (EU: A14) to 100 hours per year for testing and maintenance purposes only. 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, except as provided in 40 CFR 63.6640(f)(4). The diesel fire pumps shall burn only low sulfur (less than 0.05 percent) diesel fuel. *[40 CFR 63.6640(f) and NSR ATC Modification 1, Revision 4, Condition IV-B-2(i) (05/13/09)]*
- i. The Permittee shall shall combust only natural gas in the gas line heater (EU: A16). *[NSR ATC Modification 1, Revision 4, Condition IV-B-2(k) (05/13/09)]*
- j. The Permittee shall limit the maximum water flow in each cooling tower to 9,834 gallons per minute (EU: A19 through A24). *[AQR 12.5.2.6]*
- k. The Permittee shall limit the TDS concentration in the cooling towers process water to 7,400 ppm on a monthly average (EUs: A19 through A24). *[AQR 12.5.2.6]*

3. Emission Controls

Turbine Units 1 through 4 (EUs: A01 through A08)

- a. The Permittee shall, under all conditions, operate the source in a manner consistent with good air pollution control practice for minimizing emissions as required by 40 CFR 60.11. *[NSR ATC Modification 1, Revision 4, Condition IV-B-3(a) (05/13/09)]*
- b. The Permittee shall install Dry low-NO_x burners, SCR, and oxidation catalysts on each of the Turbine Units #1 through #4 (EUs: A01 through A08). *[NSR ATC Modification 1, Revision 4, Condition IV-B-3(b) (05/13/09)]*
- c. The Permittee shall maintain and operate the Dry low-NO_x burners, SCR, and oxidation catalysts on all turbine/duct burner combinations (EUs: A01 through A08) in accordance with manufacturer's specifications. SCR shall be operated at all times the associated turbine unit is operating, excluding periods of startup and shutdown. *[NSR ATC Modification 1, Revision 4, Condition IV-B-3(c) (05/13/09)]*
- d. The Permittee shall operate the SCR such that NO_x emissions do not exceed the limitations listed in Tables III-B-2 and II-B-3, excluding periods of startup and shutdown as defined. *[NSR ATC Modification 1, Revision 4, Condition IV-B-3(d) (05/13/09)]*
- e. The Permittee shall install oxidation catalysts on each of Turbine Units #1 through #4 (EUs: A01 through A08) and shall be maintained and operated on all 4 turbines units in accordance with manufacturer's specifications. The catalysts shall be operated at all times the associated turbine units are operating, excluding periods of startup and shutdown. *[NSR ATC Modification 1, Revision 4, Condition IV-B-3(e) (05/13/09)]*
- f. The Permittee shall use only pipeline quality natural gas fuel (maximum sulfur content of 0.5 gr/100 scf) in Turbine Units #1 through #4 (EUs: A01 through A08) to demonstrate initial and continued compliance with SO₂ limitations specified in Section III-B. *[NSR ATC Modification 1, Revision 4, Condition IV-B-3(g) (05/13/09)]*
- g. The Permittee shall determine the heating value and consumption rate for natural gas for all turbine units based on conditions of 1.0 atmosphere pressure (29.92" mercury) and 68 °F (EPA Method 19, 40 CFR 60 Subpart GG). *[NSR ATC Modification 1, Revision 4, Condition IV-B-3(h) (05/13/09)]*

Other Emission Units

- h. The Permittee shall maintain the emergency generator and fire pump as follows, unless the manufacturer's specifications are more stringent (EUs: A12, A13 and A14): *[40 CFR 63.6603 and AQR 12.5.2.6]*
 - 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.
- i. The Permittee shall operate the cooling towers with drift eliminators that have a maximum drift rate of 0.001 percent, based on manufacturer's specifications (EUs: A19 through A24). *[AQR 12.5.2.6]*

C. Monitoring

1. This source is subject to 40 CFR 60 Subparts A, Da, and GG; 40 CFR 63, Subpart ZZZZ; 40 CFR 70; 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*

13, AQR 14, 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. 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: A12, A13 and A14) 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 and 40 CFR 70.6]

Turbine Units 1 through 4 (EUs: A01 through A08)

3. Continuous Emission Monitoring:
 - a. To demonstrate continuous, direct compliance with operational limitations and the hourly and annual emission limitations for NO_x and CO specified in Section III-B of this permit, the Permittee shall install CEMS on Turbine Units #1 through #4 (EUs: A01 through A08, which shall monitor and record the following parameters for each individual CTG: [AQR 12.5.2.6 and 40 CFR 75, Subpart F]
 - i. hours of operation for startup, shutdown and normal operation separately;
 - ii. electric load;
 - iii. fuel consumption;
 - iv. exhaust gas flow rate (by direct or indirect methods);
 - v. exhaust gas concentrations of NO_x, CO, and O₂;
 - vi. 3-hour rolling average concentrations of NO_x and CO and the mass flow rate of NO_x and CO; and
 - vii. hourly and consecutive accumulated mass emissions of NO_x and CO.
 - b. The Permittee shall install, certify, operate, and maintain CEMS on Turbine Units #1 through #4 (EUs: A01 through A08) in accordance with the requirements of 40 CFR 60 and 40 CFR 75, as applicable. [AQR 12.5.2.6]
 - c. The Permittee shall certify and test CEMS initially in accordance with 40 CFR 75, Appendix A: CEMS Specifications and Test Procedures. This requirement has been met. [AQR 12.5.2.6]
 - d. The Permittee shall comply with CEMS periodic certification procedures as required in 40 CFR 75. [AQR 12.5.2.6]
 - e. The Permittee shall apply CEMS QA/QC procedures as found in 40 CFR 60 Appendices B and F and 40 CFR 75 Subparts F and G and Appendix B. [AQR 12.5.2.6]
 - f. Any exceedance of the NO_x or CO emission limitations expressed in Section III-B as determined by the CEMS shall be considered a violation of the emission limit imposed and may result in enforcement action. [AQR 12.5.2.6]
 - g. The CEMS for NO_x, CO, and diluents in the flue gas shall be used as direct compliance indications. [AQR 12.5.2.6]
 - h. 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]

- i. The Permittee shall conduct RATA of the CO, NO_x, and diluents O₂ or CO₂ CEMS at least annually unless otherwise provided for in 40 CFR 60 Appendix F or 40 CFR 75 Appendix B. [AQR 12.5.2.6(d)]
4. The Permittee shall monitor visible emissions from the HRSG units (EUs: A02, A04, A06, and A08) using the applicable procedures found in 40 CFR 60.49Da(a). [AQR 12.5.2.6 and 40 CFR 60.49Da(a)]
5. The Permittee shall use the applicable procedures specified in 40 CFR 75 Appendix D for estimating hourly SO₂ emissions from Turbine Units #1 through #4 (EUs: A01 through A08). [AQR 12.5.2.6 and 40 CFR 75.11(d)(2)]

Other Emission Units

6. Burner efficiency test for the auxiliary boilers (EUs: A09 and A10): [AQR 12.5.2.6(d)]
 - a. The Permittee shall perform a burner efficiency test on the auxiliary boilers (EUs: A09 and A10) two (2) times each year. The Permittee shall conduct the tests at least five (5) months but no more than seven (7) months apart during each calendar year. If the documented actual hours of operation of the auxiliary boilers are less than 50 during a calendar year, the Permittee may perform a burner efficiency test on that boiler only once during that calendar year..;
 - b. Burner efficiency tests shall be conducted in accordance with the manufacturer's recommendations and specifications for good combustion practices. If the manufacturer's recommendations and specifications are unavailable, the Permittee may use an alternative method to perform the boiler efficiency test upon prior approval from the Control Officer; and
 - c. A performance test conducted may replace a required burner efficiency test.
7. The Permittee shall operate each emergency generator and fire pump 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 the emergency operation shall be documented (EUs: A12, A13 and A14). [40 CFR 63.6640]
8. The Permittee shall monitor the sulfur content of the fuel burned in the emergency generator and fire pump by retaining a copy of vendor fuel specifications (EUs: A12, A13 and A14). [NSR ATC Modification 1, Revision 4, Condition IV.B.2.h and i (05/13/09)]
9. The Permittee shall monitor the TDS in the cooling tower (EU: A19 through A24) circulating water daily when operating. The Permittee shall use the conductivity measurements for TDS monitoring or equivalent method approved in advance by the Control Officer. [AQR 12.5.2.6]

D. Testing

1. Performance testing is subject to the current Air Quality guidelines on performance/source testing.
2. The Permittee shall conduct periodic performance testing on the auxiliary boilers (EUs: A09 and A10) at least once every five years, within 90 days of the anniversary date of the last performance test. [AQR 12.5.2.6]
3. Performance testing for the auxiliary boilers (EUs: A09 and A10) shall conform to the applicable requirements of this Part 70 permit. [AQR 12.5.2.6]

4. Table III-D-1 summarizes performance test methods for the auxiliary boilers. [AQR 12.5.2.6]

Table III-D-1: Performance Testing Protocol Requirements for Auxiliary Boilers

Test Point	Pollutant	Method (40 CFR 60, Appendix A)
Boiler Exhaust Outlet Stack	NO _x	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10
Stack Gas Parameters	---	EPA Methods 1, 2, 3A, and 4

5. The Permittee shall conduct performance testing on the gas line heater (EU: A16) at the request of the Control Officer [AQR 12.5.2.6]
6. Table III-D-2 summarizes performance test methods for the gas line heater: [AQR 12.5.2.6]

Table III-D-2: Performance Testing Protocol Requirements for Gas Line Heater

Test Point	Pollutant	Method (40 CFR 60, Appendix A)
Boiler Exhaust Outlet Stack	NO _x	EPA Method 7E
Boiler Exhaust Outlet Stack	CO	EPA Method 10
Stack Gas Parameters	---	EPA Methods 1, 2, 3A, and 4

E. Record Keeping

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

Turbine/Duct Burner Units (EUs: A01 through A08, inclusive):

- a. time, duration, nature, and probable cause of any CEMS downtime and corrective actions taken;
- b. CEMS audit results, RATA (reported annually) and corrective actions as required by 40 CFR 60, Appendix F;
- c. hourly and consecutive 12 month totals mass emissions of NO_x and CO as recorded by CEMS;
- d. quantity of natural gas consumed by each turbine hourly and monthly with consecutive 12-month totals;
- e. quantity of natural gas consumed by each duct burner hourly and monthly with consecutive 12-month totals;
- f. dates, times and duration of each startup/shutdown cycle;

Auxiliary Boilers (EUs: A09 and A10):

- g. hours of operation for each auxiliary boiler monthly with consecutive 12-month totals;
- h. quantity of natural gas consumed by each auxiliary boiler monthly with consecutive 12-month totals;

IC Engines (EUs: A12 through A14, inclusive):

- i. monthly and annual hours of operation for each emergency generator and fire pump for testing, maintenance; and nonemergency use;
- j. date and duration of operation for each emergency generator and fire pump for emergency use, including documentation justifying use during the emergency;

Gas Line Preheater (EU: A16):

- k. quantity of natural gas consumed by the gas line preheater monthly and annually; and

2. The Permittee shall maintain records on site that include, at a minimum: *[AQR 12.5.2.6]*
 - a. maintenance of a copy of the burner efficiency test on-site and to make such documentation available for inspection to the Control Officer upon request (EUs: A09 and A10);
 - b. log of plant-wide visual emissions checks; records of opacity monitoring for HRSG units that meet all requirements of 40 CFR 60.52 Da, if applicable;
 - c. sulfur content of natural gas as certified by the supplier in accordance with 40 CFR 75.11(d)(2);
 - d. results of performance tests conducted within the last five years;
 - e. certificates of representation for the designated representative and the alternate designated representative that meet all requirements of 40 CFR 72.24;
 - f. copies of all records, reports, compliance certifications, and submissions made or required under the Acid Rain Program;
 - g. 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;
 - h. all CEMS and/or PEMS information required by the CEMS and/or PEMS monitoring plan as specified in 40 CFR 75 Subpart F;
 - i. the CEMS quality assurance plan as specified in 40 CFR 75 Subpart F;
 - j. manufacturer's specifications for SCR and Oxidation Catalyst;
 - k. quality assurance plan approved by the Control Officer. The quality assurance plan shall contain auditing schedules, and design specifications for the CEMS. The CEMS shall conform to all provisions of 40 CFR 60.13, 40 CFR 60 Subpart GG, and 40 CFR 75;
 - l. sulfur content of diesel fuel used in the emergency generators and fire pump; and
 - m. the TDS of the cooling tower recirculation water.
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]*
4. Records and data required by this certificate 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 and 12.5.2.6]*
5. All records and logs, or a copy thereof, shall be kept on-site for a minimum of five 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]*
6. The Control Officer reserves the right to require additional requirements concerning records and record keeping for this source. *[AQR 12.5.2.6]*

F. Reporting

1. The Permittee shall submit reports to the Control Officer every six months. *[AQR 12.5.2.6]*
2. The following requirements apply to semiannual reports unless a different frequency is specified: *[AQR 12.5.2.6]*
 - a. The report shall include, at minimum, the summary of each item listed in Section III-E-1.
 - b. The report shall include summaries of any permit deviations, their probable cause and corrective or preventative action taken.

- c. The report shall be submitted to Air Quality within 30 calendar days after the reporting period.
3. The Permittee shall submit annual emissions inventory reports based on the following: [AQR 18.6]
 - a. The annual emissions inventory shall be submitted to Air Quality no later than March 31 after the reporting year.
 - b. The annual emissions inventory 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. Regardless of the date of issuance of this Part 70 Operating Permit, the source shall comply with schedule for report submissions outlined in Table III-F-1:

Table III-F-1: Required Submission Dates¹

Required Report	Applicable Period	Due Date ¹
Semiannual Report for 1st 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
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.

¹ 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

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. Malfunctions shall included, but not be limited to, upsets that cause or require a gas combustion turbine to exit Mode 6 firing configuration. The source has the burden of proof for any upset for which it claims to be a malfunction causing or requiring a gas combustion turbine to exit Mode 6 firing configuration. [AQR 12.5.2.6]
7. 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]

G. Mitigation

1. The source has no federal offset requirements. [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 Chuck Lenzie Generating Station, 13605 Chuck Lenzie Court, Las Vegas, Nevada 89165.
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. *[AQR 12.5.2.6 and 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 14.1(b) 3 Subpart Da	Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978
AQR Section 14.1(b) 5 Subpart Dc	Standards of Performance for New Stationary Sources (NSPS) – Small Industrial – Commercial – Institutional Steam Generating Units
AQR Section 14.1(b) 40 Subpart GG	Standards of Performance for New Stationary Sources (NSPS) – Stationary Gas Turbines

**ATTACHMENT 1
APPLICABLE REGULATIONS**

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE:

1. NRS, Chapter 445B.
2. 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 12.0	Applicability, General Requirements and Transition Procedures
AQR 12.4	Authority to Construct Application and Permit Requirements for Part 70 Sources
AQR 12.5	Part 70 Operating Permit Requirements
AQR Section 13.2.85	National Emission Standards for Hazardous Air Pollutant (NESHAP) for Stationary Reciprocating Internal Combustion Engines
AQR Section 14.1(b)3	Standards of Performance for New Stationary Sources (NSPS) – Standards of Performance for Electric Utility Steam Generating Units for Which Construction Commenced After September 18, 1978
AQR Section 14.1(b)5	Standards of Performance for New Stationary Sources (NSPS) – Standards of Performance for Small Industrial - Commercial - Institutional Steam Generating Units
AQR Section 14.1(b)40	Standards of Performance for New Stationary Sources (NSPS) – Standards of Performance for Gas Turbines
AQR Section 18	Permit and Technical Service Fees
AQR Section 21	Acid Rain Continuous Emissions Monitoring
AQR Section 22	Acid Rain Permits
AQR Section 24	Sampling and Testing - Records and Reports
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 60	Evaporation and Leakage
AQR Section 70	Emergency Procedures
AQR Section 80	Circumvention

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 Da	Standards of Performance for New Stationary Sources (NSPS) – Electric Utility Steam Generating Units for Which Construction Commenced After August 17, 1971
40 CFR 60, Subpart Dc	Standards of Performance for New Stationary Sources (NSPS) – Small 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 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
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

Facility (Source) Name (from STEP 1) Chuck Lenzie Station
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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).

Facility (Source) Name (from STEP 1) **Chuck Lenzie 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;

Acid Rain - Page 4

Facility (Source) Name (from STEP 1) Chuck Lenzie Station
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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

Facility (Source) Name (from STEP 1) **Chuck Lenzie 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 8/5/2014

Rose Webster

From: Williams, Kimberly <KWilliams@nvenergy.com>
Sent: Wednesday, August 12, 2015 4:00 PM
To: Rose Webster; Geraghty, Kevin; Lacy, Starla; Pritchard, Shane; Carter, Kesha; Page, Steven; Hawman, Forrest
Cc: Richard Beckstead
Subject: RE: Department of Air Quality Permit, Technical Support Document and Final Action Report for Source #01513_Chuck Lenzie Generating Station

Categories: Red Category

Rosie –

I am confirming receipt on behalf of NV Energy.

Thank you!

Kim

From: Rose Webster [<mailto:rwebster@ClarkCountyNV.gov>]
Sent: Wednesday, August 12, 2015 11:21 AM
To: Geraghty, Kevin; Lacy, Starla; Pritchard, Shane; Carter, Kesha; Page, Steven; Hawman, Forrest; Williams, Kimberly
Cc: Richard Beckstead
Subject: Department of Air Quality Permit, Technical Support Document and Final Action Report for Source #01513_Chuck Lenzie Generating Station
Importance: High

Good afternoon ladies and gentlemen,

Attached is the Permit, TSD and FAR for the above source. The Permit and TSD should be printed and maintained on site.

If you have any questions regarding the permit, contact Paul Durr at 702-455-5942.

Please confirm receipt of this email.

Thank you,

Rosie Webster
Senior Office Specialist
Permitting Division
702-455-5913
rwebster@clarkcountynv.gov

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U.S.C. 2511(1) of the Electronic Communications Privacy Act, which subjects the interceptor to fines, imprisonment and/or civil damages. If you are not the intended recipient(s), please delete it and notify me.

Rose Webster

From: Lacy, Starla <SLacy@nvenergy.com>
To: Rose Webster
Sent: Wednesday, August 12, 2015 11:30 AM
Subject: Read: Department of Air Quality Permit, Technical Support Document and Final Action Report for Source #01513_Chuck Lenzie Generating Station

Your message

To:
Subject: Department of Air Quality Permit, Technical Support Document and Final Action Report for Source #01513_Chuck Lenzie Generating Station
Sent: Wednesday, August 12, 2015 11:30:19 AM (UTC-08:00) Pacific Time (US & Canada)

was read on Wednesday, August 12, 2015 11:30:15 AM (UTC-08:00) Pacific Time (US & Canada).

Rose Webster

From: Hawman, Forrest <FHawman@nvenergy.com>
To: Rose Webster
Sent: Wednesday, August 12, 2015 11:22 AM
Subject: Read: Department of Air Quality Permit, Technical Support Document and Final Action Report for Source #01513_Chuck Lenzie Generating Station

Your message

To:
Subject: Department of Air Quality Permit, Technical Support Document and Final Action Report for Source #01513_Chuck Lenzie Generating Station
Sent: Wednesday, August 12, 2015 11:22:24 AM (UTC-08:00) Pacific Time (US & Canada)

was read on Wednesday, August 12, 2015 11:22:10 AM (UTC-08:00) Pacific Time (US & Canada).

Rose Webster

From: Carter, Kesha <KCarter@nvenergy.com>
To: Rose Webster
Sent: Wednesday, August 12, 2015 11:22 AM
Subject: Read: Department of Air Quality Permit, Technical Support Document and Final Action Report for Source #01513_Chuck Lenzie Generating Station

Your message

To:
Subject: Department of Air Quality Permit, Technical Support Document and Final Action Report for Source #01513_Chuck Lenzie Generating Station
Sent: Wednesday, August 12, 2015 11:22:04 AM (UTC-08:00) Pacific Time (US & Canada)

was read on Wednesday, August 12, 2015 11:22:00 AM (UTC-08:00) Pacific Time (US & Canada).