Clark County
Environment & Sustainability
4701 Russell Rd., 2nd floor • Las Vegas, NV 89118
Phone: (702) 455-5942 • Fax: (702) 383-9994
Marci Henson, Director

# PART 70 OPERATING PERMIT

## SOURCE ID: 00007

Clark Generating Station
5640 Stephanie St.
Las Vegas, Nevada 89122

**ISSUED ON: October 28, 2026** **EXPIRES ON: October 27, 2031**

**Current action: Renewal**

**Issued to:**
Nevada Power Company
P.O. Box 98910
Las Vegas, NV 89151

**Responsible Official:**
Jason Hammons
Vice President Generation
PHONE: (702) 239-0793
EMAIL: jason.hammons@nvenergy.com

**NATURE OF BUSINESS:**
SIC code 4911, "Electric Services"
NAICS code 221112, "Fossil Fuel Electric Power Generation"

**Issued by the Clark County Department of Environment and Sustainability/Division of Air Quality in accordance with Section 12.5 of the Clark County Air Quality Regulations.**

Santosh Mathew, Permitting Manager

# EXECUTIVE SUMMARY

NV Energy – Clark Generating Station is an electrical power generating station located in the Las Vegas Valley, Hydrographic Area 212 (HA 212), which is currently designated as attainment for all pollutants except ozone. HA 212 was designated a moderate nonattainment area for ozone on January 5, 2023. The designation did not impose any new requirements at that time. HA 212 was designated a serious nonattainment area for ozone on January 21, 2025. Clark County has drafted or imposed new requirements to address this designation, which include, but are not limited to, lowering the $NO_x$ and VOC major source thresholds to 50 tons per year.

The source consists of seventeen natural gas-fired turbines (one 60 MW simple cycle unit, four 85 MW combined cycle units which provide heat for four heat recovery steam generator (HRSG) turbines with no supplemental duct firing, and 12 simple cycle paired units rated at 57.9 MW per pair), two 54,000 gpm cooling towers, one 474 hp diesel-fired emergency generator, one 460 hp diesel-fired emergency fire pump, and one 250 gallon above ground gasoline storage tank. The source also has three ammonia storage tanks (sealed), diesel storage tanks, maintenance shop activities (i.e., sand blasters, etc.), steam cleaning operations, and lube oil sumps and vents that are designated as insignificant activities.

This source is a categorical source, as defined by AQR 12.2.2(j)(1). Therefore, fugitive emissions are included in the source status determination.

This source is a Major Source of $PM_{10}$, $PM_{2.5}$, $NO_x$, CO, and VOC for the purposes of the Title V program and a Minor Source for $SO_2$ and HAP. Because the source is a Major Source for a criteria pollutant, it is as an Anyway Source for Greenhouse Gases (GHGs).

This source is subject to 40 CFR Part 60, Subparts: GG, KKKK, and IIII, and 40 CFR Part 63, Subparts: ZZZZ and CCCCCC. By meeting the requirements of 40 CFR Part 60, Subpart IIII (for the applicable engines), the source meets the requirements of 40 CFR Part 63, Subpart ZZZZ. Additionally, this source is regulated by 40 CFR Part 72, Acid Rain Permits Regulation.

The following table summarizes the source's potential to emit (PTE) of each regulated air pollutant from all emission units addressed by this Part 70 Operating Permit.

**Table 1: Source-wide Potential to Emit**

| Pollutant | $PM_{10}$ | $PM_{2.5}$ | $NO_x$ | CO | $SO_2$ | VOC | HAPs[1] | Pb | $H_2S$ | GHG[2] |
|---|---|---|---|---|---|---|---|---|---|---|
| Tons/year | 715.84 | 715.84 | 1,026.62 | 1,851.70 | 48.44 | 216.66 | 8.10 | 0 | 0 | 4,529,427 |

[1] A major source is defined as 10 tons for any individual HAP or 25 tons for combination of all HAPs.
[2] Metric tons per year of carbon dioxide equivalent. GHG = greenhouse gas pollutants.

DAQ received the Title V renewal application on December 12, 2024. Based on information submitted by the applicant and a technical review performed by DAQ staff, DAQ proposes the issuance of a renewed Part 70 Operating Permit to Nevada Power Company.

DAQ will continue to require the permittees to estimate their GHG PTE in terms of each individual pollutant ($CO_2$, $CH_4$, $N_2O$, $SF_6$ etc.) during subsequent permitting actions, and the corresponding TSDs will include these PTEs for informational purposes.

Pursuant to AQR 12.5.2, all terms and conditions in Sections 1 through 9, and all attachments to this permit, are federally enforceable unless explicitly denoted otherwise.

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# Common Acronyms and Abbreviations

(These terms may be seen in the permit)

| | |
|---|---|
| AQR | Clark County Air Quality Regulation |
| AST | aboveground storage tank |
| ATC | Authority to Construct |
| BACT | Best Available Control Technology |
| BLM | Bureau of Land Management |
| bhp | brake horsepower |
| CAA | Clean Air Act |
| CD | control device |
| CE | control efficiency |
| CEMS | Continuous Emissions Monitoring System |
| CF | control factor |
| CFR | Code of Federal Regulations |
| CO | carbon monoxide |
| CPI | Urban Consumer Price Index |
| $CO_2$ | carbon dioxide |
| $CO_2e$ | carbon dioxide equivalent |
| DAQ | Division of Air Quality |
| DES | Clark County Department of Environment and Sustainability |
| DOM | date of manufacture |
| EF | emissions factor |
| EPA | U.S. Environmental Protection Agency |
| EU | emission unit |
| GHG | greenhouse gas |
| g/kW-hr | grams per kilowatt hour |
| gpm | gallons per minute |
| HA | Hydrographic Area |
| HAP | hazardous air pollutant |
| hp | horsepower |
| HSRG | Heat Recovery Steam Generator |
| kW | kilowatts |
| LAER | Lowest Achievable Emission Rate |
| LVH | lower heating value |
| MMBtu/hr | Million British Thermal Units per Hour |
| NAAQS | National Ambient Air Quality Standard |
| NAICS | North American Industry Classification System |
| NEI | net emission increase |
| $NO_x$ | nitrogen oxide(s) |
| NSR | New Source Review |
| O&M | operations and maintenance |
| OP | operating permit |
| Pb | lead |
| $PM_{2.5}$ | particulate matter less than 2.5 microns in aerodynamic diameter |
| $PM_{10}$ | particulate matter less than 10 microns in aerodynamic diameter |
| ppm | parts per million |
| PSD | prevention of significant deterioration |
| PTE | potential to emit |
| RACT | Reasonably Achievable Control Technology |

| | |
|---|---|
| RATA | Relative Accuracy Test Audit |
| RICE | reciprocating internal combustion engine |
| RMP | Risk Management Plan |
| SCC | Source Classification Code |
| SDE | Status Determination Evaluation |
| SIC | Standard Industrial Classification |
| SIP | State Implementation Plan |
| SM | synthetic minor |
| $SO_2$ | sulfur dioxide |
| SOP | standard operating procedure |
| TBD | to be determined |
| TDS | total dissolved solids |
| TPH | tons per hour |
| TSD | Technical Support Document |
| ULNB | Ultra Low $NO_x$ Burner |
| VAEL | Voluntarily Accepted Emission Limit |
| VMT | vehicle miles traveled |
| VOC | volatile organic compound |

# *1.0 EQUIPMENT*

## 1.1 EMISSION UNITS

The stationary source covered by this Part 70 Operating Permit (Part 70 OP) consists of the emission units and associated appurtenances summarized in Table 1-1. *[AQR 12.5.2.3]*

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

| EU | Description | Rating | Manufacturer | Model No. | Serial No. |
|---|---|---|---|---|---|
| **Natural Gas-Fired Turbines** | | | | | |
| A00704D | Natural Gas-Fired Turbine (Unit 4); Simple Cycle | 60 MW | General Electric | 7B (7000) | |
| A00701A | Natural Gas-Fired Turbine (Unit 5); Combined Cycle | 85 MW | Westinghouse | 501B6 | |
| A00702B | Natural Gas-Fired Turbine (Unit 6); Combined Cycle | 85 MW | Westinghouse | 501B6 | |
| A00705 | Natural Gas-Fired Turbine (Unit 7); Combined Cycle | 85 MW | Westinghouse | 501B6 | |
| A00708 | Natural Gas-Fired Turbine (Unit 8); Combined Cycle | 85 MW | Westinghouse | 501B6 | |
| **Cooling Towers[1]** | | | | | |
| A00712 | Cooling Tower (four cells) For Unit 9 Steam Turbine Generator (associated with Turbines 7 and 8) | 54,000 gpm | | | |
| A00713 | Cooling Tower (four cells) For Unit 10 Steam Turbine Generator (associated with Turbines 5 and 6) | 54,000 gpm | | | |
| **Emergency Diesel-Fired Engines** | | | | | |
| A21 | Genset - Emergency | 354 kW | Kohler | 300R0ZD71 | 302650 |
| | Engine – Diesel DOM: pre 1993 | 474 hp | Detroit Diesel | 8063-7416 | 6V-92TA |
| A45 | Emergency Fire Pump | 460 hp | Aurora | 10-481-18D | 20-2596555 |
| | Engine – Diesel DOM: 2009 | | Cummins | CFP15E-F10 | 79347925 |
| **Natural Gas-Fired Peaking Turbines[2]** | | | | | |
| A27 | Two (2) Natural Gas-Fired Turbines (Unit 11); Simple Cycle | 57.9 MW (Combined) | Pratt and Whitney | FT8-3 Swift Pac | |
| A28 | Two (2) Natural Gas-Fired Turbines (Unit 12); Simple Cycle | 57.9 MW (Combined) | Pratt and Whitney | FT8-3 Swift Pac | |
| A29 | Two (2) Natural Gas-Fired Turbines (Unit 13); Simple Cycle | 57.9 MW (Combined) | Pratt and Whitney | FT8-3 Swift Pac | |
| A30 | Two (2) Natural Gas-Fired Turbines (Unit 14); Simple Cycle | 57.9 MW (Combined) | Pratt and Whitney | FT8-3 Swift Pac | |
| A31 | Two (2) Natural Gas-Fired Turbines (Unit 15); Simple Cycle | 57.9 MW (Combined) | Pratt and Whitney | FT8-3 Swift Pac | |

| EU | Description | Rating | Manufacturer | Model No. | Serial No. |
|---|---|---|---|---|---|
| A32 | Two (2) Natural Gas-Fired Turbines (Unit 16); Simple Cycle | 57.9 MW (Combined) | Pratt and Whitney | FT8-3 Swift Pac | |
| A33 | Two (2) Natural Gas-Fired Turbines (Unit 17); Simple Cycle | 57.9 MW (Combined) | Pratt and Whitney | FT8-3 Swift Pac | |
| A34 | Two (2) Natural Gas-Fired Turbines (Unit 18); Simple Cycle | 57.9 MW (Combined) | Pratt and Whitney | FT8-3 Swift Pac | |
| A35 | Two (2) Natural Gas-Fired Turbines (Unit 19); Simple Cycle | 57.9 MW (Combined) | Pratt and Whitney | FT8-3 Swift Pac | |
| A36 | Two (2) Natural Gas-Fired Turbines (Unit 20); Simple Cycle | 57.9 MW (Combined) | Pratt and Whitney | FT8-3 Swift Pac | |
| A37 | Two (2) Natural Gas-Fired Turbines (Unit 21); Simple Cycle | 57.9 MW (Combined) | Pratt and Whitney | FT8-3 Swift Pac | |
| A38 | Two (2) Natural Gas-Fired Turbines (Unit 22); Simple Cycle | 57.9 MW (Combined) | Pratt and Whitney | FT8-3 Swift Pac | |
| **Gasoline Dispensing Facility** | | | | | |
| A46 | Aboveground Storage Tank: Regular Unleaded Gasoline | 250 gallons | | | |

Note: $ft^3$ = cubic feet; gpm = gallons per minute; hp = horsepower; kw = kilowatt; MW = megawatt.
[1]Each cooling tower has four cells rated at 13,500 gpm each (54,000 gpm total per cooling tower).
[2]Operated generally during periods of peak demand.

## 1.2 INSIGNIFICANT ACTIVITIES

The units in Table 1-2 are present at this source, but are insignificant activities pursuant to AQR 12.5.2.5. The emissions from these units or activities, when added to the PTE of the source, will not make the source major for any additional pollutant.

**Table 1-2: Summary of Insignificant Activities**

| Rating | Description |
|---|---|
| 19,900 gallons each | Three Ammonia Storage Tanks (Sealed) |
| | Diesel Storage Tanks |
| | Maintenance Shop Activities (e.g. sand blasters, etc.) |
| | Steam Cleaning Operations |
| | Lube Oil Sumps and Vents |

## 1.3 NONROAD ENGINES

Pursuant to Title 40, Part 1068.30 of the Code of Federal Regulations (40 CFR Part 1068.30), nonroad engines that are portable or transportable (i.e., not used on self-propelled equipment) shall not remain at a location for more than 12 consecutive months, or a shorter period of time for an engine located at a seasonal source; otherwise, the engine(s) will constitute a stationary reciprocating internal combustion engine (RICE) and be subject to the applicable requirements of 40 CFR Part 63, Subpart ZZZZ; 40 CFR Part 60, Subpart IIII; and/or 40 CFR Part 60, Subpart JJJJ. Stationary RICE shall be permitted as emission units upon commencing operation at this stationary source.

A location is any single site at a building, structure, facility, or installation. For any engine(s) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced, include the time period of both engines in calculating the consecutive time period.

An engine located at a seasonal source is an engine that remains at a seasonal source during the full annual operating period of the seasonal source. A seasonal source is a stationary source that remains in a single location on a permanent basis (i.e., at least two years) and that operates at that single location approximately three months (or more) each year.

Records of location changes for portable or transportable nonroad engines shall be maintained and shall be made available to the Control Officer on request. These records are not required for engines owned and operated by a contractor for maintenance and construction activities as long as that contractor maintains records demonstrating that such work took place at the stationary source for periods of less than 12 consecutive months. Nonroad engines used on self-propelled equipment do not have the 12-month limitation or associated recordkeeping requirements.

# *2.0 CONTROLS*

## 2.1 CONTROL DEVICES

1. The permittee shall utilize water injection and operate Selective Catalytic Reduction (SCR) systems and oxidation catalysts at all times, excluding periods of startup, shutdown, and testing/tuning, while any affected emission unit is operating, as indicated in Table 2-1. *[Part 70 OP Renewal: December 12, 2024]*

**Table 2-1: Summary of Add-On Control Devices**

| EU | Device Type | Control Device Number | Manufacturer | Model No. | Pollutant |
|---|---|---|---|---|---|
| A27 | Water Injection Skid | CD1a | Becon Inc. | N/A | $NO_x$ |
| | SCR | CD1b | Peerless Mfg. Co. | N/A | $NO_x$ |
| | Oxidation Catalyst | CD1c | BASF | N/A | CO/VOC |
| A28 | Water Injection Skid | CD2a | Becon Inc. | N/A | $NO_x$ |
| | SCR | CD2b | Peerless Mfg. Co. | N/A | $NO_x$ |
| | Oxidation Catalyst | CD2c | BASF | N/A | CO/VOC |
| A29 | Water Injection Skid | CD3a | Becon Inc. | N/A | $NO_x$ |
| | SCR | CD3b | Peerless Mfg. Co. | N/A | $NO_x$ |
| | Oxidation Catalyst | CD3c | BASF | N/A | CO/VOC |
| A30 | Water Injection Skid | CD4a | Becon Inc. | N/A | $NO_x$ |
| | SCR | CD4b | Peerless Mfg. Co. | N/A | $NO_x$ |
| | Oxidation Catalyst | CD4c | BASF | N/A | CO/VOC |
| A31 | Water Injection Skid | CD5a | Becon Inc. | N/A | $NO_x$ |
| | SCR | CD5b | Peerless Mfg. Co. | N/A | $NO_x$ |
| | Oxidation Catalyst | CD5c | BASF | N/A | CO/VOC |
| A32 | Water Injection Skid | CD6a | Becon Inc. | N/A | $NO_x$ |
| | SCR | CD6b | Peerless Mfg. Co. | N/A | $NO_x$ |
| | Oxidation Catalyst | CD6c | BASF | N/A | CO/VOC |
| A33 | Water Injection Skid | CD7a | Becon Inc. | N/A | $NO_x$ |
| | SCR | CD7b | Peerless Mfg. Co. | N/A | $NO_x$ |
| | Oxidation Catalyst | CD7c | BASF | N/A | CO/VOC |
| A34 | Water Injection Skid | CD8a | Becon Inc. | N/A | $NO_x$ |
| | SCR | CD8b | Peerless Mfg. Co. | N/A | $NO_x$ |
| | Oxidation Catalyst | CD8c | BASF | N/A | CO/VOC |
| A35 | Water Injection Skid | CD9a | Becon Inc. | N/A | $NO_x$ |
| | SCR | CD9b | Peerless Mfg. Co. | N/A | $NO_x$ |
| | Oxidation Catalyst | CD9c | BASF | N/A | CO/VOC |
| A36 | Water Injection Skid | CD10a | Becon Inc. | N/A | $NO_x$ |
| | SCR | CD10b | Peerless Mfg. Co. | N/A | $NO_x$ |
| | Oxidation Catalyst | CD10c | BASF | N/A | CO/VOC |

| EU | Device Type | Control Device Number | Manufacturer | Model No. | Pollutant |
|---|---|---|---|---|---|
| A37 | Water Injection Skid | CD11a | Becon Inc. | N/A | $NO_x$ |
| | SCR | CD11b | Peerless Mfg. Co. | N/A | $NO_x$ |
| | Oxidation Catalyst | CD11c | BASF | N/A | CO/VOC |
| A38 | Water Injection Skid | CD12a | Becon Inc. | N/A | $NO_x$ |
| | SCR | CD12b | Peerless Mfg. Co. | N/A | $NO_x$ |
| | Oxidation Catalyst | CD12c | BASF | N/A | CO/VOC |

Note: Each EU consists of two gas turbines that converge into a common stack housing the CO catalyst, SCR catalyst, and ammonia injection system.

## 2.2 CONTROL REQUIREMENTS

*Turbines Units 5 through 8*

1. The permittee shall comply with all applicable requirements and limits listed in 40 CFR Part 60, Subpart A and Subpart GG (EUs: A00701A, A00702B, A00705 and A00708) by meeting the following conditions and other applicable provisions:

   a. The permittee shall use only natural gas in the combustion turbine units at the source. *[Consent Decree Condition IV-B-33 (08/13/07)]*

   b. Sulfur content of natural gas fuel shall not exceed 0.5 grains per 100 dscf as determined by annual verification. *[40 CFR Part 75, Appendix D]*

   c. The permittee shall meet the $NO_x$ limitation under Subpart GG that is based on the formula provided in 40 CFR Part 60.332(a)(1), as applicable.

2. The permittee shall control $PM_{10}$ exhaust emissions from each simple cycle system by properly maintaining and periodically replacing inlet air filters for each turbine. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-19 (03/20/07)]*

*Turbine Units 11 through 22 (Peaker Units)*

3. The permittee shall install a Selective Catalytic Reduction (SCR) system on Turbines 11 through 22 (EUs: A27-A38). $NO_X$ exhaust emissions shall be further controlled with water injection and good combustion practice. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-12 (03/20/07)]*

4. The permittee shall maintain and operate the SCR system on Turbines 11 through 22 (EUs: A27-A38) in accordance with manufacturer's specifications. SCR shall be operated at all times the associated turbine unit is operating, excluding periods of startup, shutdown, and testing/tuning. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-13 (03/20/07) and Part 70 OP (10/05/20)]*

5. The permittee shall operate each SCR system such that $NO_X$ emission limits for associated turbine units are met. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-14 (03/20/07)]*

6. The permittee shall install, operate, and maintain oxidation catalysts to control CO and VOC emissions on Turbines 11 through 22 (EUs: A27-A38) in accordance with manufacturer's

specifications. The catalysts shall be operated at all times the associated turbine units are operating, excluding periods of startup, shutdown, and testing/tuning. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-15 (03/20/07) and Part 70 OP (10/05/20)]*

7. The permittee shall operate each oxidation catalyst on Turbine Units 11 through 22 (EUs: A27-A38) such that CO and VOC emission limits are met. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-16 (03/20/07)]*

## *Cooling Towers*

8. The permittee shall operate the cooling towers (EUs: A00712 and A00713) with drift eliminators that have a maximum drift rate of 0.001 percent, based on manufacturer's specifications. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-7 (03/20/07), revised in Prior Notice Form: March 11, 2024]*

9. The permittee shall limit the TDS concentration in the cooling towers process water to 12,000 ppm on a 30-day rolling average. (EUs: A00712 and A00713*) [NSR ATC/OP 00007, Modification 4 Revision 1, Conditions III-A-6 and III-B-7 (03/20/07)]*

## *Diesel Engines*

10. The permittee shall combust only diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35 % by volume in the fire pump (EU: A45) and emergency generator (EU: A21). *[40 CFR Part 63.6604(b) and 40 CFR Part 60.4207(b)]*

11. The permittee shall operate the fire pump (EU: A45) with turbocharger and aftercooler. *[NSR ATC 00007, Modification 6, Conditions IV-D-1, (04/27/09)]*

12. The permittee shall inspect and maintain the diesel emergency generator (EU: A21) to comply with the following requirements in accordance with the provisions of 40 CFR Part 63, Subpart ZZZZ:

    a. Change the oil and filter every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first;

    b. Inspect air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and

    c. Inspect all hoses and belts every 500 hours or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

13. The permittee may use an oil analysis program (described in 40 CFR Part 63.6625(i)) to extend the specified oil change requirement and can petition the Control Officer pursuant to the requirements of 40 CFR Part 63.6(g) for alternative work practices. (EU: A21) *[40 CFR Part 63.6602]*

14. During startup periods, the permittee shall minimize the diesel-fired generator engine's (EU: A21) time spent at idle and minimize its startup time to a period needed for appropriate and safe loading of the engine (not to exceed 30 minutes), after which non-startup emission limitations will apply. *[40 CFR Part 63.6602]*

15. The permittee shall operate and maintain the diesel-fired emergency generator set and fire pump in accordance with the manufacturer's O&M manual for emissions-related components (EUs: A21 and A45). *[AQR 12.5.2.6(a)]*

## *Gasoline Dispensing*

16. The permittee shall implement control technology requirements on gasoline dispensing equipment. *[40 CFR Part 63, Subpart CCCCCC, AQR 12.5.2.6(a) & AQR 102]*

17. The permittee shall install, operate, and maintain in good working condition at all times the GDF, including any associated air pollution control and monitoring equipment, in a manner consistent with good air pollution control practices for minimizing emissions. *[AQR 102.5(b)]*

18. From October 1 to March 31 every year in the Las Vegas Valley, the Eldorado Valley, the Ivanpah Valley, the Boulder City limits, and any area within three miles of these areas, no gasoline intended as a final product for fueling motor vehicles shall be supplied or sold by any person; sold at retail; sold to a private or a municipal fleet for consumption; or introduced into any motor vehicle by any person unless the gasoline has at least 3.5 percent oxygen content by weight. *[AQRs 53.1.1 & 53.2.1]*

19. If a gasoline storage tank in the Las Vegas Valley, the Eldorado Valley, the Ivanpah Valley, the Boulder City limits, and any area within three miles of these areas, receives its last gasoline delivery with less than 3.5 percent oxygen content by weight before September 15, gasoline dispensed from that tank will be exempt from enforcement of Section 53.2.1 until the first delivery date after October 1. *[AQR 53.5.1.1]*

20. The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Preventative measures to be taken include, but are not limited to, the following: *40 CFR Parts 63.11116 and AQRs 102.5(c) & 102.6(b)]*

    a. Minimize gasoline spills;

    b. Clean up spills as expeditiously as practicable;

    c. Cover all open gasoline containers and all storage tank fill-pipes with a gasketed seal when not in use; and

    d. Only load gasoline into storage tanks using a submerged fill tube where the greatest distance from the bottom of the storage tank to the point of the fill tube opening is no more than six inches.

21. The permittee shall not allow degassing of gasoline vapors from any gasoline storage tank at the GDF unless VOC emissions are controlled by a device that has been approved in advance by the Control Officer to be at least 90% efficient by weight. *[AQR 102.5(d)]*

## *Other*

22. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. *[Part 70 OP Renewal (12/12/24), AQR 40; and AQR 43]*

23. The permittee shall, to the extent practicable, maintain and operate any affected source including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions, at all times, including periods of startup, shutdown, and malfunction. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. *[40 CFR Part 60.11(d)]*

24. The permittee must comply with the control requirements contained in this section. If there is inconsistency between standards or requirements, the most stringent standard or requirement shall apply. *[AQR 12.5.2.6(a)]*

# *3.0 LIMITATIONS AND STANDARDS*

## 3.1 OPERATIONAL LIMITS

*Turbines Units 5 through 8*

1. A startup period for Turbine Units 5 through 8 (EUs: A00701A, A00702B, A00705 and A00708) is defined as the period immediately following the beginning of the combustion of fuel not to exceed 60 minutes, except during a Cold Steam Turbine Startup of a unit operating in combined cycle mode. Cold Steam Turbine Startup means the startup of a power block when the steam turbine first stage base metal temperatures are below 250 degrees F. A Cold Steam Turbine Startup is defined as the period immediately following the beginning of the combustion of fuel in the first unit to start in that power block, not to exceed 120 minutes. A shutdown period is defined as the period of no more than 60 minutes that immediately precedes the cessation of fuel combustion. *[ATC Modification 5, Condition IV-E-8 (10/1/08)]*

*Turbine Units 11 through 22 (Peaker Units)*

2. The permittee shall limit the operation of each Turbine, Unit 11 through 22 (EUs: A27-A38), to 3,500 hours per year. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-A-3 (03/20/07) and AQR 12.5.2.6(a)]*

3. The permittee shall limit the number of startups and shutdowns of each Turbine, Units 11 through 22 (EUs: A27-A38), to 350 startups and 350 shutdowns per year. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-A-3 (03/20/07) and AQR 12.5.2.6(a)]*

4. Testing/tuning is defined as planned operation outside of normal emission limitations for the purpose of data collection, diagnostics, or operational adjustment. *[Part 70 OP (10/05/20)]*

5. The permittee shall limit all testing/tuning for Turbines 11 through 22 (EUs: A27-A38) to a cumulative total of 600 minutes per calendar year per turbine. *[Part 70 OP (10/05/20)]*

6. For Turbines 11 through 22 (EUs: A27-A38), each startup or shutdown is limited to 60 minutes. A startup for these units shall commence with the combustion of fuel in either or both turbines of the unit, and a shutdown shall terminate with the cessation of fuel combustion in either or both turbines of the unit. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-B-5 (03/20/07)]*

*Cooling Towers*

7. The permittee shall limit the maximum water flow in each cooling tower to 54,000 gallons per minute (EUs: A00712 and A00713). *[NSR ATC/OP 00007, Modification 4 Revision 1, Conditions III-A-6 and III-B-7 (03/20/07) and AQR 12.5.2.6(a)]*

*Diesel Engines*

8. The permittee shall limit the operation of the emergency generator (EU: A21) for testing and maintenance purposes to 100 hours/year. The permittee may operate the emergency generator up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. Except as provided below (8.a–e

inclusive), the emergency generator cannot be used for peak shavings or nonemergency demand response, or to generate income for a facility by supplying power to an electric grid or to otherwise supply power as part of a financial arrangement with another entity: *[40 CFR Part 63.6640 and AQR 12.5.2.6(a)]*

a. The engine is dispatched by the local balancing authority and/or local transmission and distribution operator.

b. The dispatch is intended to mitigate local transmission and/or distribution limitations to avert potential voltage collapse or line overloads that could lead to interruption of power supply in a local area or region.

c. The dispatch follows reliability, emergency operation, or similar protocols that follow specific NERC, regional, state, public utility commission, or local standards or guidelines.

d. The power is provided only to the facility itself or to support the local transmission and distribution system.

e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission, or local standards or guidelines that are being followed for the dispatching engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

9. The permittee shall limit the operation of the fire pump (EU: A45) for testing and maintenance purposes to 100 hours/year. The permittee may operate the fire pump up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. *[40 CFR Part 60.4211 and AQR 12.5.2.6(a)]*

## *Gasoline Dispensing*

10. The permittee shall limit the gasoline throughput (EUs: A46) to 1,000 gallons per month. *[AQR 12.5.2.6(a)]*

## *Other*

11. The permittee shall limit operation of each natural gas turbine unit to the heat input limits listed in table 3-1 based on the LHV: *[NSR ATC Modification 4 Revision 1, Condition III-A (02/09/07) and AQR 12.5.2.6(a)]*

**Table 3-1: Natural Gas Turbine Units Heat Input Limits**

| Emission Unit | Clark Station Designation | Natural Gas |
|---|---|---|
| A00704D | Turbine Unit 4 | 899 MMBtu/hr |
| A00701A | Turbine Unit 5 | 1,081 MMBtu/hr |
| A00702B | Turbine Unit 6 | 1,081 MMBtu/hr |
| A00705 | Turbine Unit 7 | 1,081 MMBtu/hr |
| A00708 | Turbine Unit 8 | 1,081 MMBtu/hr |
| A27 | Turbine Unit 11 | 541 MMBtu/hr |
| A28 | Turbine Unit 12 | 541 MMBtu/hr |

| Emission Unit | Clark Station Designation | Natural Gas |
|---|---|---|
| A29 | Turbine Unit 13 | 541 MMBtu/hr |
| A30 | Turbine Unit 14 | 541 MMBtu/hr |
| A31 | Turbine Unit 15 | 541 MMBtu/hr |
| A32 | Turbine Unit 16 | 541 MMBtu/hr |
| A33 | Turbine Unit 17 | 541 MMBtu/hr |
| A34 | Turbine Unit 18 | 541 MMBtu/hr |
| A35 | Turbine Unit 19 | 541 MMBtu/hr |
| A36 | Turbine Unit 20 | 541 MMBtu/hr |
| A37 | Turbine Unit 21 | 541 MMBtu/hr |
| A38 | Turbine Unit 22 | 541 MMBtu/hr |

## 3.2 EMISSION LIMITS

1. The permittee shall not allow actual emissions from the individual emission units to exceed the calculated PTE listed in Table 3-2 on a consecutive 12-month total. *[AQR 12.5.2.3, NSR ATC/OP 00007, Modification 4 Revision 1, (03/20/07), Modification 5, (10/1/08), Modification 6, (04/27/09), Part 70 OP (10/05/20), and Part 70 OP Renewal: December 12, 2024]*

**Table 3-2: EU PTE Including Startups, Shutdowns, and Testing/Tuning (tons per year)**

| EU | Condition[1] | $PM_{10}$ | $PM_{2.5}$ | $NO_x$ | CO | $SO_2$ | VOC |
|---|---|---|---|---|---|---|---|
| A00704D | 8,760 hr/yr | 165.40 | 165.40 | 292[2] | 433.10 | 7.90 | 94.50 |
| A00701A | 8,760 hr/yr | 106.90 | 106.90 | 360[3] | 319.70 | 7.10 | 21.90 |
| A00702B | 8,760 hr/yr | 106.90 | 106.90 | | 319.70 | 7.10 | 21.90 |
| A00705 | 8,760 hr/yr | 106.90 | 106.90 | | 319.70 | 7.10 | 21.90 |
| A00708 | 8,760 hr/yr | 106.90 | 106.90 | | 319.70 | 7.10 | 21.90 |
| A00712 | 8,760 hr/yr | 6.68 | 6.68 | 0 | 0 | 0 | 0 |
| A00713 | 8,760 hr/yr | 6.68 | 6.68 | 0 | 0 | 0 | 0 |
| A21 | 500 hr/yr | 0.26 | 0.26 | 2.48 | 1.03 | 0.01 | 0.02 |
| A45 | 500 hr/yr | 0.02 | 0.02 | 0.62 | 0.17 | 0.01 | 0.11 |
| A27 | 3,500 hr/yr | 9.10 | 9.10 | 30.96 | 11.55 | 1.01 | 2.86 |
| A28 | 3,500 hr/yr | 9.10 | 9.10 | 30.96 | 11.55 | 1.01 | 2.86 |
| A29 | 3,500 hr/yr | 9.10 | 9.10 | 30.96 | 11.55 | 1.01 | 2.86 |
| A30 | 3,500 hr/yr | 9.10 | 9.10 | 30.96 | 11.55 | 1.01 | 2.86 |
| A31 | 3,500 hr/yr | 9.10 | 9.10 | 30.96 | 11.55 | 1.01 | 2.86 |
| A32 | 3,500 hr/yr | 9.10 | 9.10 | 30.96 | 11.55 | 1.01 | 2.86 |
| A33 | 3,500 hr/yr | 9.10 | 9.10 | 30.96 | 11.55 | 1.01 | 2.86 |
| A34 | 3,500 hr/yr | 9.10 | 9.10 | 30.96 | 11.55 | 1.01 | 2.86 |
| A35 | 3,500 hr/yr | 9.10 | 9.10 | 30.96 | 11.55 | 1.01 | 2.86 |
| A36 | 3,500 hr/yr | 9.10 | 9.10 | 30.96 | 11.55 | 1.01 | 2.86 |
| A37 | 3,500 hr/yr | 9.10 | 9.10 | 30.96 | 11.55 | 1.01 | 2.86 |

| EU | Condition[1] | $PM_{10}$ | $PM_{2.5}$ | $NO_x$ | CO | $SO_2$ | VOC |
|---|---|---|---|---|---|---|---|
| A38 | 3,500 hr/yr | 9.10 | 9.10 | 30.96 | 11.55 | 1.01 | 2.86 |
| A46 | 1,000 gal/month | 0 | 0 | 0 | 0 | 0 | 0.11 |

Note: There is a flow rate operational limit on the cooling towers (EUs: A00712 and A00713). For reporting purposes, 8,760 hours per year used for the cooling towers.
[1]The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit.
[2]$NO_x$ emissions are capped at 292 tpy pursuant to AQR 122.5.1(a)(2) as requested by the permittee. While the unit is evaluated at 8,760 hours/year, operation exceeding approximately 1,476 hours in a 12-month period serves as a threshold for review to ensure the annual cap is not exceeded. This assumes that the EF used is 395.57 lb/hr derived by taking the $NO_x$ PTE of 1,732.6 tpy (including startup and shutdown) and multiplying it by 2000 lb/ton and dividing that by 8,760 hr/yr. The 1,476 hours in a 12-month period is not an enforceable limit, meaning this hour figure is not binding as it can be less if a higher EF is established or more if a lower EF is established.
[3]$NO_x$ limit pursuant to AQR 122.5.1(b)(3).

2. The permittee shall not allow the actual emissions from each emission unit to exceed the applicable limits listed in Table 3-3. Pound-per-hour limits are normal operation (excluding startup, shutdown, and testing/tuning) limits only. Neither $NO_x$ nor CO emissions for the stationary gas turbine units shall exceed any one-hour average period as determined by the CEMS. The emission limits do not apply to Turbine Units 5 through 8 (EUs: A00701A, A00702B, A00705, and A00708) for $NO_x$ during Allowable Exceedances. *[NSR ATC/OP 00007, Modification 4 Revision 1, (03/20/07) and Modification 5, (10/1/08), Part 70 OP (10/05/20), AQR 122.5.1, and AQR 12.5.2.6(a)]*

**Table 3-3: EU PTE, Excluding Startups, Shutdowns, and Testing/Tuning (lbs per hour)**

| EU | $PM_{10}$ | $NO_x$ | CO | $SO_2$ | VOC |
|---|---|---|---|---|---|
| A00704D | - | - | - | - | 21.6[2] |
| A00701A | 24.4 | 19.91 | 50.00 | 1.62[1] | 5.0[1,3] |
| A00702B | 24.4 | 19.91 | 50.00 | 1.62[1] | 5.0[1,3] |
| A00705 | 24.4 | 19.91 | 50.00 | 1.62[1] | 5.0[1,3] |
| A00708 | 24.4 | 19.91 | 50.00 | 1.62[1] | 5.0[1,3] |
| A27 | 3.61 | 11.01 | 2.61 | 0.36 | 1.49[4] |
| A28 | 3.61 | 11.01 | 2.61 | 0.36 | 1.49[4] |
| A29 | 3.61 | 11.01 | 2.61 | 0.36 | 1.49[4] |
| A30 | 3.61 | 11.01 | 2.61 | 0.36 | 1.49[4] |
| A31 | 3.61 | 11.01 | 2.61 | 0.36 | 1.49[4] |
| A32 | 3.61 | 11.01 | 2.61 | 0.36 | 1.49[4] |
| A33 | 3.61 | 11.01 | 2.61 | 0.36 | 1.49[4] |
| A34 | 3.61 | 11.01 | 2.61 | 0.36 | 1.49[4] |
| A35 | 3.61 | 11.01 | 2.61 | 0.36 | 1.49[4] |
| A36 | 3.61 | 11.01 | 2.61 | 0.36 | 1.49[4] |
| A37 | 3.61 | 11.01 | 2.61 | 0.36 | 1.49[4] |
| A38 | 3.61 | 11.01 | 2.61 | 0.36 | 1.49[4] |

[1]These short-term emission limits are not federally enforceable.
[2]Per AQR 122.5.1(a)(3), VOC emissions are limited to 21.6 lb/hr or less in a 3-hour period, calculated as a block average but not including 1-hour periods with startup, shutdown, or testing/tuning operations.
[3]VOC limit pursuant to AQR 122.5.1(b)(4).
[4]Per AQR 122.5.1(c)(3), VOC emissions are limited to 1.49 lb/hr or less in a 3-hour period, calculated as a block average but not including 1-hour periods with startup, shutdown, or testing/tuning operations.

3. The permittee shall not allow actual emissions from each emission unit to exceed the applicable limits listed in Table 3-4. The emission limits are normal operation (exclude startup, shutdown, and testing/tuning) limits only. The emission limits do not apply to Turbine Units 5 through 8 (EUs: A00701A, A00702B, A00705, and A00708) for $NO_X$ during allowable exceedances. *[NSR ATC Modification 6, Revision 3, Conditions IV-B-1(a) and (b) (04/16/09), Part 70 OP (10/05/20), AQR 122.5.1, and AQR 12.5.2.6(a)]*

**Table 3-4: Emission Rates Excluding Startup, Shutdown, and Testing/Tuning Operations**

| EU | $NO_x$ | | CO | | VOC |
|---|---|---|---|---|---|
| | ppmvd[1] @15% $O_2$ | lb/ MMBtu | ppmvd[1] @15% $O_2$ | lb/ MMBtu | ppmvd @ 15% $O_2$ |
| A00704D | 120[2] | - | - | - | - |
| A00701A | 5[3] | 0.02 | - | 0.08 | - |
| A00702B | 5[3] | 0.02 | - | 0.08 | - |
| A00705 | 5[3] | 0.02 | - | 0.08 | - |
| A00708 | 5[3] | 0.02 | - | 0.08 | - |
| A27–A38 | 5[4] | - | 2 | - | 2 |

[1]On a one-hour average, unless otherwise noted.
[2] Per AQR 122.5.1(a)(1), $NO_x$ emissions are limited to 120 ppmvd or less, corrected to 15% $O_2$, in a 3-hour period, calculated as a block average but not including 1-hour periods with startup, shutdown, or testing/tuning operations
[3]$NO_x$ emission limits are based on the consent decree and AQR 122.5.1(b)(1) limit of 5 ppmvd with ULNB.
[4]$NO_x$ emission limits are based on AQR 122.5.1(c)(1) limit of 5 ppmvd.

4. The permittee shall not allow actual emissions from Turbine Units 11 through 22 (EUs: A27-A38) to exceed the applicable Subpart KKKK emission concentrations listed in Table 3-5. *[40 CFR Part 60.4320, AQR 122.5.1(c)(2), and AQR 12.5.2.6(a)]*

**Table 3-5: Applicable Subpart KKKK Standards, 4-Hour Rolling Average, Turbine Units**

| EU | $NO_x$ (ppmvd @ 15% O2), 4-hour Rolling Average | |
|---|---|---|
| | For Turbine Loads Greater Than or Equal To 75% of Peak Load | For Turbine Loads Less Than 75% of Peak Load or During Periods of Startup/Shutdown[1] |
| Each of A27–A38 | 25 | 96 |

[1]Pursuant to 40 CFR Part 60.4320 and AQR 122.5.1(c)(2), the 96 ppmvd limit applies as a 4-hour rolling average during low-load operation or rolling 4-hour periods that contain a startup/shutdown event.

5. The permittee shall comply with the emission limit in Table 3-6 during periods of testing/tuning. *[Part 70 OP (10/05/20) and AQR 12.5.2.6(a)]*

**Table 3-6: Testing/Tuning Mass Emission Limitations (pounds per hour)**

| EU | CO |
|---|---|
| Each of A27–A38 | 15 |

6. The permittee shall limit $NO_x$ emissions from Turbine Unit 4 (EU: A00704D) to 292 tons per year or less in any consecutive 12-month period, calculated as a 12-month total rolled monthly, that includes emissions from all hours of operation. *[AQR 122.5.1(a)(2) and AQR 12.5.2.6(a)]*

7. The permittee shall limit the combined $NO_x$ emissions from Turbine Units 5 through 8 (EUs: A00701A, A00702B, A00705, and A00708) to 360 tons per year or less, computed as the collective total from the affected units in any consecutive 12-month period. Emissions shall be calculated as a 12-month total, rolled monthly, that includes all hours of operation of the

affected units. The permittee shall not use $NO_x$ Allowances to comply with the 360-ton $NO_x$ limit. *[Consent Decree Condition IV-C-38-b, (08/13/07), AQR 122.5.1(b)(3), and AQR 12.5.2.6(a)]*

8. The emission limits for Turbine Units 5 through 8 (EUs: A00701A, A00702B, A00705, and A00708) in Tables 3-3 and 3-4 shall not apply to $NO_x$ if the criteria in Condition 3.2.11 are met. *[NSR ATC/OP 00007, Modification 4 Revision 1, (03/20/07), NSR ATC/OP 00007, Modification 5, Section III-B (10/01/08), Part 70 OP Renewal: December 12, 2024, and AQR 12.5.2.6(a)]*

9. The permittee shall not exceed the emission limits for each emission unit during Allowable Exceedances, as listed in Table 3-7. *[NSR ATC/OP 00007, Modification 5 (10/1/08), AQR 122.5.1(b)(2), and AQR 12.5.2.6(a)]*

**Table 3-7: Emission Rates for Turbine Units 5 through 8, Allowable Exceedences[1]**

| EU | $NO_X$ ppm (at 15% $O_2$ on a one-hour average) | lb $NO_X$ per MMBtu[2] |
|---|---|---|
| A00701A, A00702B, A00705, A00708 | 32.0 (per unit) | 0.12 (per unit) |

[1]Allowable Exceedences are subject to the requirements of Condition 3.2.10.
[2]$NO_x$ EF = (32 ppm/1,000,000)*(1 lb mol/385.3 dscf)*(46.01 lb $NO_2$/lb mol)*(8,710 dscf/MMBtu)*(20.9/20.9-15)

10. The permittee shall limit the Turbine Units 5 through 8 (EUs: A00701A, A00702B, A00705, and A00708) to a 5 ppm $NO_x$ emission rate during all periods of operation except startup, shutdown, or Allowable Exceedances. Allowable Exceedances are defined as when the following are met *[Consent Decree Condition IV-B-35, (08/13/07), NSR ATC/OP 00007, Modification 5 Revision 0, Condition IV-B-2 (10/01/08), Part 70 OP Renewal: December 12, 2024, and AQR 12.5.2.6(a)]*:

    a. Either of the following:

        i. Rapid combustion turbine load changes due to activation of the Automatic Safety or Equipment Protection Systems which rapidly decrease turbine load; or

        ii. A change in the combustion mode of the ULNBs triggered by the Automatic Safety or Equipment Protection Systems;

    b. When the 1-hour average $NO_x$ emissions above the 5 ppm $NO_x$ emission rate did not occur as a result of operator neglect; improper operation or maintenance; or the tampering with, interfering with, altering, or adjusting any equipment in any way which conceals or disguises the type and quantity of emission;

    c. When the operating conditions described in 3.2.10.a.i. or ii. are recorded in the plant's operating log within 24 hours of the event, and in the CEMS by 5 pm the next business day following the event. The notations in the log and CEMS must describe the data, list the time of entry into the log, and describe the plant operating conditions responsible for the event;

    d. When the 1-hour average $NO_x$ concentration does not exceed 32 ppm, when calculated by the method described in 4.1.14; and

e. Within 30 calendar days of the event, the permittee files a report with the EPA and Department of Justice that sets forth the information that demonstrates the applicability to the event of conditions 3.2.10.a-d above.

11. The conditions of 3.2.10 shall apply to no more than ten 1-hour averages of $NO_x$ emissions per turbine unit per calendar year. The permittee shall demonstrate that it has met the conditions of 3.2.10. All $NO_x$ emissions during these 1-hour periods covered by Section 3.2.10 shall be included when calculating the yearly $NO_x$ tonnage. *[Consent Decree Condition IV-B-36, (08/13/07), NSR ATC/OP 00007, Modification 5 Revision 0, Condition IV-B-3 (10/01/08), Part 70 OP Renewal: December 12, 2024, and AQR 12.5.2.6(a)]*

*Other*

12. The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20% opacity for a period of more than six consecutive minutes *[AQR 26.1 and AQR 12.5.2.6(a)]*

# *4.0 COMPLIANCE DEMONSTRATION REQUIREMENTS*

## 4.1 MONITORING

1. The permittee shall comply with the applicable monitoring requirements of 40 CFR Part 60, Subparts A and GG by maintaining CEMS on Turbine Units 5 through 8 (EUs: A00701A, A00702B, A00705, and A00708) and 40 CFR Part 60, Subparts A and KKKK and 40 CFR Part 75 on Turbine Units 11 through 22 (EUs: A27–A38). *[AQR 122.5.1(b) and AQR 12.5.2.6(d)]*

    a. Required periodic audit procedures and QA/QC procedures for CEMS shall conform to the provisions of 40 CFR Part 60 and 40 CFR Part 75.

    b. Relative Accuracy Test Audits (RATA) of the CO, $NO_x$, and $O_2$ CEMS shall be conducted at least annually, or the frequency specified in 40 CFR Part 60 and 75, as applicable.

2. The permittee shall comply with applicable monitoring requirements of 40 CFR Part 63, Subpart CCCCCC by maintaining records of gasoline throughput. *[AQR 12.5.2.6(d)]*

3. The permittee shall comply with applicable emissions limits in this operating permit. Emissions of $NO_X$ and/or CO greater than the applicable limits, as determined by the $NO_x$ and CO CEMS, shall be considered a violation of the emission limits of this permit and may result in enforcement action. However, compliant CEMS data does not preclude the use of other credible evidence in determining or showing compliance. *[AQR 12.5.2.6(d)]*

### *Visible Emissions [AQR 12.5.2.6(d)]*

4. The Responsible Official shall sign and adhere to the *Visible Emissions Check Guidebook* and keep a copy of the signed guide on-site at all times.

5. The permittee shall conduct a visual emissions check at least quarterly on each diesel-fired emergency generator (EU: A21) and fire pump (EU: A45) while in operation.

6. If no plume appears to exceed the opacity standard during the visible emissions check, the date, location, and results shall be recorded, along with the viewer's name.

7. If a plume appears to exceed the opacity standard, the permittee shall do one of the following:

    a. Immediately correct the perceived exceedance, then record the first and last name of the person who performed the emissions check, the date the check was performed, the unit(s) observed, and the results of the observation; or

    b. Call a certified Visible Emissions Evaluation (VEE) reader to perform a U.S. Environmental Protection Agency (EPA) Method 9 evaluation.

        i. For sources required to have a certified reader on-site, the reader shall start Method 9 observations within 15 minutes of the initial observation. For all other sources, the reader shall start Method 9 observations within 30 minutes of the initial observation.

ii. If no opacity exceedance is observed, the certified VEE reader shall record the first and last name of the person who performed the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each emission unit that was initially perceived to have exceeded the opacity limit, and the record shall also indicate:

(1) The cause of the perceived exceedance;

(2) The color of the emissions; and

(3) Whether the emissions were light or heavy.

iii. If an opacity exceedance is observed, the certified VEE reader shall take immediate action to correct the exceedance. The reader shall then record the first and last name of the person performing the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each reading identified, and the record shall also indicate:

(1) The cause of the exceedance;

(2) The color of the emissions;

(3) Whether the emissions were light or heavy;

(4) The duration of the emissions; and

(5) The corrective actions taken to resolve the exceedance.

8. Any scenario of visible emissions noncompliance can and may lead to enforcement action.

*Turbine Unit 4*

9. The permittee shall at the end of each month, calculate a 12-month total NOx emissions (in tpy) for the preceding 12-month period. (EU: A00704D) *[AQR 122.5.2(a)(5) and AQR 12.5.2.6(d)]*

10. The permittee shall at the end of each month, calculate the total hours of operation for Turbine Unit 4 (EU: A00704D) as a 12-month total for the preceding 12-month period. *[AQR 12.5.2.6(d)]*

11. The permittee shall monitor the hourly heat input rate (in MMBtu/hr) for Turbine Unit 4 (EU: A00704D) using the hourly volume of natural gas combusted and the monthly natural gas LHV. *[AQR 12.5.2.6(d)]*

12. The permittee shall monitor the $NO_x$ and VOC emissions using the parameters identified in the performance test protocol submitted to the Control Officer (as specified in Condition 4.2.8) to demonstrate compliance with the concentration and mass emission limitations in Section 3.2 of this permit. *[AQR 122.5.2(a)(4) and AQR 12.5.2.6(d)]*

*Turbine Units 5 through 8*

13. The permittee shall demonstrate continued direct compliance with operational limitations and the hourly and/or yearly emissions limitations for $NO_x$ and CO specified in Sections 3.1

and 3.2 of this permit, the permittee shall calibrate, maintain, and operate CEMS on Turbine Units 5 through 8 (EUs: A00701A, A00702B, A00705, and A00708) to monitor and record the parameters for each individual turbine unit listed below. The data collection and storage shall be managed via an automated data acquisition and handling system (DAHS): *[AQR 122.5.2(b) and AQR 12.5.2.6(d)]*

a. Hours of operation;

b. Fuel consumption;

c. Hours of downtime of the CEMS;

d. Exhaust gas flow rate (by direct or indirect methods);

e. Exhaust gas concentration of $NO_x$, CO and $O_2$;

f. One hour average $NO_x$ concentration;

g. Hourly and 12-month rolling accumulated mass emissions of $NO_x$ and CO; and

h. Hourly heat input in MMBtu/hr.

14. The permittee shall monitor VOC emissions using the parameters identified in the performance test protocol submitted to the Control Officer (as specified in Condition 4.2.11) to demonstrate compliance with the mass emission limitations in Section 3.2 of this permit. *[AQR 122.5.2(b)(8) and AQR 12.5.2.6(d)]*

15. The permittee shall maintain a Quality Assurance Plan (QAP) for CEMS. The QAP is binding and consistent with the regulations. The QAP contains auditing schedules, reporting schedules, and design specifications for the CEMS system. The CEMS shall conform to all provisions of 40 CFR Part 60.13 and 40 CFR Part 60, Subpart GG. Audit procedures shall conform to the provisions of 40 CFR Part 60, Appendix F. The QAP for CEMS required for Turbines 5 through 8 (EUs: A00701A, A00702B, A00705, and A00708) has already been submitted to and accepted by the Control Officer. *[AQR 12.5.2.6(d)]*

16. To determine the $NO_x$ emission concentration on a one-hour average for Turbine Units 5 through 8 (EUs: A00701A, A00702B, A00705, and A00708), the permittee shall use CEMS in accordance with the applicable reference methods specified in 40 CFR Part 60 to calculate emission for each 15-minute interval within each clock hour, except as provided in this condition. Compliance with the 5 ppm $NO_x$ emission rate shall be shown by the permittee by averaging all 15-minute CEMS interval readings within a clock hour, except that any 15-minute CEMS interval that contains any part of a startup or shutdown shall not be included in the calculation of that 1-hour average. A minimum of two 15-minute CEMS interval readings within a clock hour, not including startup or shutdown intervals, is required to determine compliance with the 5 ppm $NO_x$ emission rate on a 1-hour average. *[ATC Modification 5, Condition IV-E-7 (10/1/08) and AQR 12.5.2.6(d)]*

17. The permittee shall monitor monthly occurrences and duration of startup/shutdown cycles for Turbine Units 5 through 8 (EUs: A00701A, A00702B, A00705, and A00708). *[AQR 12.5.2.6(d)]*

*Turbine Units 11 through 22 (Peaker Units)*

18. The permittee shall monitor and record at least the following data from each CEMS using an automated data acquisition and handling system (DAHS): (EUs: A27-A38) *[AQR 122.5.2(b) and AQR 12.5.2.6(d)]*

    a. Exhaust gas concentration of $NO_X$, CO, and diluent $O_2$;

    b. Exhaust gas flow rate (by direct or indirect methods);

    c. Fuel flow rate;

    d. Hours of operation;

    e. One-hour clock averages for $NO_X$ and CO concentrations;

    f. Hourly mass emissions of $NO_X$ and CO;

    g. Hours of downtime of the CEMS; and

    h. Hourly heat input in MMBtu/hr.

19. The permittee shall monitor VOC emissions using the parameters and the appropriate parameter range identified in the performance test protocol submitted to the Control Officer (as specified in Condition 4.2.11) to demonstrate compliance with the concentration and mass emission limitations in Section 3.2 of this permit. *[AQR 122.5.2(b)(8) and AQR 12.5.2.6(d)]*

20. The permittee shall report all emissions recorded by CEMS in clock-hour increments. Any clock hour that contains any part of a startup, shutdown, or testing/tuning event on either or both turbines of the unit shall not be subject to the limits in Tables 3-3 or 3-4. (EUs: A27-A38) *[AQR 12.5.2.6(d)]*

21. Any clock hour that contains any part of a testing/tuning event shall be subject to the testing/tuning limits. (EUs: A27-A38) *[Part 70 OP (10/05/20) and AQR 12.5.2.6(d)]*

22. The permittee shall ensure the QAP for CEMS associated with Turbine Units 11 through 22 (EUs: A27–A38) is consistent with the regulations. The CEMS shall conform to all provisions of 40 CFR Part 60.13 and 40 CFR Part 60, Subpart KKKK. Audit procedures shall conform to the provisions of 40 CFR Part 60, Appendix F, except insofar as Subpart KKKK allows the use of 40 CFR Part 75 provisions. The QAP shall contain auditing schedules, reporting schedules, and design specifications for the CEMS systems. The QAP for CEMS required for Turbine Units 11 through 22 has already been submitted to and accepted by the Control Officer. *[NSR ATC/OP 00007, Modification 4 Revision 1, Condition III-E-9 (03/20/07) and AQR 12.5.2.6(d)]*

23. The permittee shall monitor monthly occurrences and duration of startup/shutdown cycles for Turbine Units 11 through 22 (EUs: A27–A38). *[AQR 12.5.2.6(d)]*

24. The permittee shall monitor the duration of testing/tuning events for each turbine unit (EUs: A27–A38). *[AQR 12.5.2.6(d)]*

*Cooling Towers*

25. The permittee shall monitor the TDS in the cooling tower 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. (EUs: A00712 and A00713) *[AQR 12.5.2.6(d)]*

*Diesel Engines*

26. The permittee shall operate each emergency engine (EUs: A21 and A45) with a nonresettable hour meter and monitor the duration of operation for testing, maintenance, and non-emergency operation, and separately for emergencies. *[NSR ATC 00007, Modification 6, Conditions IV-E-1, (04/27/09) and AQR 12.5.2.6(d)]*

27. The permittee shall monitor the sulfur content, and cetane index or aromatic content of the fuel burned in the fire pump (EU: A45) and emergency generator (EU: A21) by retaining a copy of vendor fuel specifications. *[40 CFR Part 63.6604(b), 40 CFR Part 60.4207(b), and AQR 12.5.2.6(d)(1)(B)]*

*Gasoline Dispensing*

28. The permittee shall monitor and record as necessary the throughput of gasoline (EU: A46) in gallons so as to determine monthly combined throughput, and shall calculate each month the total of the last 365 days of gasoline throughput divided by 12. *[AQR 12.5.2.6(d)]*

29. The permittee shall monitor the fuel storage and dispensing system to determine if its components are in compliance with the control requirements of this permit. Monitoring inspections shall be recorded and consist of: *[AQR 12.5.2.6(d)]*

    a. Inspecting each day the tank is operated for gasoline spills, and recording the times and dates the source became aware of a spill and cleaned the spill up; and

    b. Inspecting covers on gasoline containers and fill pipes after each respective delivery, and recording the dates of fuel deliveries and corresponding inspections.

## 4.2 TESTING

1. At the Control Officer's request, the permittee shall test (or have tests performed) to determine emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of those allowed by the AQRs 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 4.2]*

2. At the Control Officer's request, 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 4.2]*

3. The permittee shall submit to the Control Officer for approval a performance testing protocol that contains testing, reporting, and notification schedules, test protocols, and anticipated test dates no less than 45 days, but no more than 90 days, before the anticipated date of the performance test unless otherwise specified in this permit. *[AQR 12.5.2.8]*

4. The permittee shall submit to EPA for approval any alternative test methods EPA has not already approved to demonstrate compliance with a requirement under 40 CFR Part 60. *[40 CFR Part 60.8(b)]*

5. Performance testing is subject to 40 CFR Part 60.8 (as amended), Subpart A and the department's *Guidelines for Source Testing (3/25/2025)*. Performance testing shall be the instrument for determining initial and subsequent compliance with the emission limitations set forth in Section 3.2 this permit. *[AQR 12.5.2.8(a)]*

## *Turbine Unit 4*

6. The permittee shall conduct a performance test on Unit 4 (EU: A00704D) to demonstrate compliance with the $NO_x$ and VOC emissions limitation specified in Section 3.2 of this permit after submitting a performance testing protocol to the Control Officer for approval in accordance with department guidelines containing test, reporting, and notification schedules, test protocols, and anticipated test dates at least 45 days, but no more than 90 days, before the anticipated test date. The performance test must be performed no later than 180 days after the Administrator approves these sections into the Nevada State Implementation Plan (SIP). Compliance testing for $NO_x$ shall be conducted using EPA Method 1 (stack traverse points), EPA Method 2 (stack gas velocity), EPA Method 3A ($O_2$ %), and EPA Method 7E ($NO_x$), or alternative method(s) approved by the Control Officer. Compliance testing for VOC shall determine the lb/hr emission rate by using EPA Method 18 to obtain methane and ethane concentrations at the stack, and EPA Method 25A to determine total THC concentrations at the stack, with the results from Method 18 subtracted from the results of Method 25A to determine the lb/hr VOC emission rate, or alternative method(s) approved by the Control Officer. A previously conducted performance test may satisfy the requirements of this paragraph if resubmitted by the owner or operator and accepted by the Control Officer for the purpose of complying with this paragraph. *[AQR 122.5.2(a)(1) and AQR 12.5.2.8(a)]*

7. The permittee shall conduct a subsequent performance test on Unit 4 (EU: A00704D) every 5 years, and no later than 90 days after the anniversary date of the previous successful test, to demonstrate compliance with the NOx and VOC emission limitations specified in Section 3.2 of this permit. *[AQR 122.5.2(a)(2) and AQR 12.5.2.8(a)]*

8. In the performance test protocol submitted to the Control Officer, the permittee shall identify one or more parameters to monitor, the appropriate parameter range, and emission factors that the owner or operator will use to demonstrate continuous compliance with the emissions limitations specified in Section 3.2 of this permit for Unit 4 (EU: A00704D). *[AQR 122.5.2(a)(3) and AQR 12.5.2.8(a)]*

## *Turbine Units 5-8 and Units 11-22*

9. The permittee shall conduct a performance test on Units 5-8 (EUs: A00701A, A00702B, A00705, and A00708) and Units 11-22 (EUs: A27-A38) to demonstrate compliance with the VOC emissions limitation specified in Section 3.2 of this permit after submitting a performance testing protocol to the Control Officer for approval in accordance with department guidelines containing test, reporting, and notification schedules, test protocols, and anticipated test dates at least 45 days, but no more than 90 days, before the anticipated test date. The performance test must be performed no later than 180 days after the Administrator approves these sections into the Nevada State Implementation Plan (SIP). Compliance testing for VOC shall determine the lb/hr emission rate by using EPA Method

18 to obtain methane and ethane concentrations at the stack, and EPA Method 25A to determine total THC concentrations at the stack, with the results from Method 18 subtracted from the results of Method 25A to determine the lb/hr VOC emission rate, or alternative method(s) approved by the Control Officer. A previously conducted performance test may satisfy the requirements of this paragraph if resubmitted by the owner or operator and accepted by the Control Officer for the purpose of complying with these paragraphs, and the date of such accepted test shall establish the anniversary date for subsequent testing. *[AQR 122.5.2(b)(5) and AQR 12.5.2.8(a)]*

10. The permittee shall conduct a subsequent performance test on Units 5-8 (EUs: A00701A, A00702B, A00705, and A00708) and Units 11-22 (EUs: A27-A38) every 5 years, and no later than 90 days after the anniversary date of the previous successful test, to demonstrate compliance with the VOC emission limitations specified in Section 3-2 of this permit. *[AQR 122.5.2(b)(6) and AQR 12.5.2.8(a)]*

11. In the performance test protocol submitted to the Control Officer, the permittee shall identify one or more parameters to monitor, the appropriate parameter range, and emissions factors that the owner or operator will use to demonstrate continuous compliance with the mass emissions limitations specified in Section 3.2 of this permit for Units 5-8 (EUs: A00701A, A00702B, A00705, and A00708) and Units 11-22 (EUs: A27-A38). *[AQR 122.5.2(b)(7) and AQR 12.5.2.8(a)]*

*General*

12. The Control Officer will consider approving the permittee's request for alternative performance test methods previously approved by EPA, if proposed in writing in the performance test protocols. *[AQR 12.5.2.8(a)]*

13. The permittee shall submit a report describing the results of each performance test to the Control Officer within 60 days of the end of the test. *[AQR 12.5.2.8]*

14. The permittee of any stationary source that fails to demonstrate compliance with emissions standards or limitations during any performance test shall submit a compliance plan to the Control Officer within 90 days of the end of the performance test. *[AQR 12.5.2.8(a)]*

15. The Control Officer may require additional performance testing when operating conditions appear inadequate to demonstrate compliance with the emissions and/or limitations in this permit. *[AQR 12.5.2.8(a)]*

## 4.3 RECORDKEEPING

1. The permittee shall keep records of all inspections, maintenance, and repairs, as required by this permit. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

2. The permittee shall comply with all applicable recordkeeping requirements of 40 CFR Part 60.7; 40 CFR Part 60, Subpart GG; 40 CFR Part 60, Subpart IIII; 40 CFR Part 60, Subpart KKKK; 40 CFR Part 72; 40 CFR Part 75, Subpart F; 40 CFR Part 63, Subpart ZZZZ; 40 CFR Part 63, Subpart CCCCCC; AQR 102.11; AQR 122; and any other applicable regulations.

3. All records, logs, etc., or copies thereof, shall be kept on-site for a minimum of five years from the date the measurement, or data was entered. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

4. Records and data required by this permit to be maintained by the permittee may be audited at any time by a third party selected by the Control Officer. *[AQR 4.1]*

5. At a minimum, the permittee shall create and maintain the records identified in Sections 4.3.6 and 4.3.7, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

6. The permittee shall maintain the following records on-site for reporting: *[AQR 12.5.2.6(d), AQR 12.5.2.8, AQR 122.4, and AQR 122.5.3]*

*Stationary Gas Turbine Unit 4*

a. Monthly, consecutive 12-month total $NO_x$ emissions (in tons per year);

b. Monthly, consecutive 12-month total hours of operation;

*Stationary Gas Turbine Units 5-8 and Units 11-22*

c. The magnitude and duration of excess emissions, permit deviations, notifications, monitoring system performance, malfunctions, and corrective actions taken, as required by 40 CFR Part 60.7;

d. Total combined duration of startups and shutdowns (EUs: A27-A38);

e. The number of occurrences and the duration of each testing/tuning event as well as the reason of the testing/tuning (EUs: A27-A38);

f. CEMS audit results or accuracy checks, and corrective actions, as required by 40 CFR Part 60, 40 CFR Part 75, the CEMS Quality Assurance Plan, and RACT provisions under AQR 122;

g. Time, duration, nature and probable cause of any CEMS downtime and corrective actions taken;

h. Monthly CEMS $NO_x$ and CO emissions data;

i. Monthly and annual total hours of operation for the peaker turbine generators (EUs: A27-A38);

j. Monthly, consecutive 12-month total quantity of natural gas consumed in each gas turbine;

*Diesel Engines*

k. Date and duration of operation of the emergency generator and fire pump for testing, maintenance, and non-emergency use (EUs: A21 and A45);

l. Date and duration of operation of the emergency generator and fire pump for emergency use, including documentation justifying use during the emergency (EUs: A21 and A45);

*Gasoline Dispensing*

m. Monthly, consecutive 12-month total gasoline throughput (EU: A46) pursuant to 40 CFR Part 63.11116(b);

*Other*

n. Deviations from permit requirements resulting in excess emissions (report as required by Section 4.4);

o. Deviations from permit requirements not resulting in excess emissions; and

p. Monthly, consecutive 12-month total emissions for each emission unit included in Table 3-2 (in tons per year);

7. The permittee shall maintain the following records on-site: *[AQR 12.5.2.6(d), AQR 12.5.2.8, AQR 122.4, and AQR 122.5.3]*

*Opacity*

a. Dates and time when visible emissions and/or opacity checks and observations were made, and the corrective steps taken to bring opacity into compliance;

*Stationary Gas Turbine Unit 4*

b. Records of the monitored operational parameter(s), parameter range(s), and emission factors established during the performance test protocol as specified in AQR 122 to demonstrate continuous compliance with the $NO_x$ and VOC emission limits in Section 3.2 of this permit;

c. Copies of all performance test protocols, test reports, and Control Officer acceptance/approval letters;

d. The date, time, and duration of each startup, shutdown, and testing/tuning event for Turbine Unit 4 (EU: A00704D);

e. The calculated hourly heat input rate (in MMBtu/hr) based on the LHV;

*Stationary Gas Turbine Units 5-8 and Units 11-22*

f. All CEMS information required by 40 CFR Part 75, including a CEMS monitoring plan;

g. Startup and shutdown emissions per turbine in pounds per hour and yearly emissions, including startup, shutdown and normal operations, in tons per each consecutive 12-month period;

h. The date, time, and duration of each startup and shutdown (EUs: A00701A, A00702B, A00705, A00708, and A27-A38);

i. Sulfur content of natural gas;

j. Annual 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 to demonstrate compliance with the requirements of the Acid Rain Program;

l. Manufacturer's O&M manual for SCR and Oxidation Catalyst controls;

m. Records of the monitored operational parameter(s), parameter range(s), and emission factors established during the performance test protocol as specified in AQR 122 to demonstrate continuous compliance with the VOC emission limits in Section 3.2 of this permit;

n. Copies of all performance test protocols, test reports, and Control Officer acceptance/approval letters;

o. CEMS QA/QC procedure as specified in AQR 122;

p. The calculated hourly heat input rate (in MMBtu/hr) for each turbine unit;

*Cooling Towers*

q. Daily TDS content of tower circulation of each cooling tower water, when operating (EUs: A00712 and A00713);

r. Records of the maximum water circulation rate (design capacity) in GPM for each cooling tower (EUs: A00712 and A00713);

*Diesel Engines*

s. Records of fire pump (EU: A45) and emergency generator (EU: A21) inspection/maintenance;

t. Sulfur content and cetane index or aromatic content of diesel fuel used to power the fire pump (EU: A45) and emergency generator (EU: A21) as certified by the supplier;

*Gasoline Dispensing*

u. Manufacturer's specifications for emission units/control equipment, if applicable and obtainable;

v. Required equipment inspections and maintenance;

w. Maintenance on storage and distribution equipment, including a general description of location and parts;

x. Date and time storage and distribution equipment was taken out-of-service;

y. Date of repair or replacement of storage and distribution equipment/parts;

z. Date and time of gasoline delivered;

*Nonroad Engines*

aa. Records of location changes for nonroad engines, if applicable;

*Other*

bb. O&M manual for each affected unit and associated air pollution control technology, along with documentation demonstrating the implementation of good combustion and management practices in accordance with the manual as specified in AQR 122.4(b)(1)(F)-(G);

cc. Performance test results, if applicable (reported as required by Section 4.2 of this permit);

dd. The permittee shall submit an RMP by the date specified in Section 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Parts 70 or 71 should this stationary source, as defined in 40 CFR Part 68.3, become subject to the accidental release prevention regulations in 40 CFR Part 68; *[AQR 12.5.2.6(d)(4)(B)]*

ee. Calendar year combined annual gasoline product throughput (reported annually);

ff. The calendar year annual emissions for the entire source (annual report only);

## 4.4 REPORTING AND NOTIFICATIONS

1. The permittee shall certify compliance with the terms and conditions contained in this Part 70 OP, including emission limitations, standards, work practices, and the means for monitoring such compliance. *[AQR 12.5.2.8(e)]*

2. The permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W. Russell Road, Suite 200, Las Vegas, NV 89118) and the Region 9 Administrator (Director, Air and Radiation Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each calendar year will be due on January 30 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. These methods and means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements described in 40 CFR Part 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 Clean Air 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 (b) above. 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 was required and in which an excursion or exceedance, as defined under 40 CFR Part 64, occurred.

3. The permittee shall report to the Control Officer any startup, shutdown, malfunction, emergency, or deviation that causes emissions of regulated air pollutants in excess of any limits set by regulations or 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 24 hours of the time the permittee learns of the excess emissions, the permittee shall notify DAQ by phone at (702) 455-5942, by fax at (702) 383-9994, or by email at airquality@clarkcountynv.gov.

   b. Within 72 hours of the notification required by paragraph 3.a above, the permittee shall submit a detailed written report to DAQ containing the information required by AQR 25.6.3.

4. With the semiannual monitoring report, the permittee shall report to the Control Officer 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)]*

5. The owner or operator of any source required to obtain a permit under AQR 12 shall report to the Control Officer emissions in excess of an applicable requirement or emission limit that pose a potential imminent and substantial danger to public health and safety or the environment as soon as possible, but no later than 12 hours after the deviation is discovered, and submit a written report within two days of the occurrence. *[AQR 25.6.2]*

6. The permittee shall submit all compliance certifications to the U.S. Environmental Protection Agency (EPA) and to the Control Officer. *[AQR 12.5.2.8(e)(4)]*

7. Any application form, report, or compliance certification submitted to the Control Officer pursuant to the permit or the AQRs, shall contain a certification by a Responsible Official, with an original signature, of truth, accuracy, and completeness. This certification, and any other 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)]*

8. The permittee shall furnish to the Control Officer, in writing and within a reasonable time, any information that the Control Officer may request 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 that the permit requires keeping. The permittee may furnish records deemed confidential directly to the Administrator, along with a claim of confidentiality. *[AQR 12.5.2.6(g)(5)]*

9. At the Control Officer's request, the permittee shall provide any information or analyses that will disclose the nature, extent, quantity, or degree of air contaminants that are or may be discharged by the source, and the type or nature of control equipment in use. The Control Officer may require such disclosures be certified by a professional engineer registered in the

state. In addition to this report, the Control Officer may designate an authorized agent to make an independent study and report on the nature, extent, quantity, or degree of any air contaminants that are or may be discharged from the source. An agent so designated may examine any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.1]*

10. The permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1 and AQR 12.5.2.4]*

    a. The annual emissions inventory must be submitted to DAQ by March 31 of each calendar year (if March 31 falls on a state or federal holiday, or on any day the office is not normally open for business, the submittal is due on the next business day);

    b. The calculated actual annual emissions from each emission unit shall be reported even if there was no activity, along with the total calculated actual annual emissions for the source based on the emissions calculation methodology used to establish the potential to emit (PTE) in the permit or an equivalent method approved by the Control Officer prior to submittal; and

    c. As the first page of text, a signed certification containing the sentence: "I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate, and complete." This statement shall be signed and dated by a Responsible Official of the company (a sample form is available from DAQ).

11. Stationary sources that emit 25 tons or more of nitrogen oxide (NOX) and/or emit 25 tons or more of volatile organic compounds (VOC) from their emission units, insignificant activities, and exempt activities during a calendar year shall submit an annual emissions statement for both pollutants. Emissions statements must include actual annual NOX and VOC emissions from all activities, including emission units, insignificant activities and exempt activities. Emissions statements are separate from, and additional to, the calculated annual emissions reported each year for all regulated air pollutants (aka Emissions Inventory). *[AQR 12.9.1]*

12. The permittee shall submit to the Control Officer, within 15 days after commencing operation, any outstanding identification and/or description that was not previously available for new emission unit(s), as noted in this permit with "TBD." (Use this condition if there is emission unit information in the permit that is incomplete and noted with "TBD.")

13. The permittee shall comply with all applicable notification and reporting requirements of 40 CFR Part 60.7; 40 CFR Part 60, Subpart GG; 40 CFR Part 60, Subpart IIII; 40 CFR Part 60, Subpart KKKK; 40 CFR Part 72; 40 CFR Part 75, Subpart F; 40 CFR Part 63, Subpart ZZZZ; and 40 CFR Part 63, Subpart CCCCCC. *[AQR 12.5.2.6(d)]*

14. The permittee shall submit semiannual monitoring reports to DAQ. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

15. The following requirements apply to semiannual reports: *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

    a. The report shall include items listed in Section 4.3.6.

b. The report shall be based on a calendar semiannual period, which includes partial reporting periods.

c. The report shall be received by DAQ within 30 calendar days after the semiannual period.

16. Regardless of the date of issuance of this OP, the source shall comply with the schedule for report submissions outlined in Table 4-1. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

**Table 4-1: Required Submission Dates for Various Reports**

| Required Report | Applicable Period | Due Date |
|---|---|---|
| Semiannual report for 1st six-month period | January, February, March, April, May, June | July 30 each year[1] |
| Semiannual report for 2nd six-month period; any additional annual records required | July, August, September, October, November, December | January 30 each year[1] |
| Annual Compliance Certification | Calendar year | January 30 each year[1] |
| Annual Emissions Inventory Report | Calendar year | March 31 each year[1] |
| Annual Emissions Statement[2] | Calendar year | March 31 each year[1] |
| Notification of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission | As required | Within 24 hours of the permittee learns of the event |
| Excess Emissions that Pose a Potential Imminent and Substantial Danger | As required | Within 12 hours of when permittee learns of event |
| Report of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission | As required | Within 72 hours of the notification[1] |
| Deviation Report without Excess Emissions | As required | Along with semiannual reports[1] |
| Performance Testing Protocol | As required | No less than 45 days, but no more than 90 days, before the anticipated test date[1] |
| Performance Testing Results | As required | Within 60 days of end of test[1] |
| RATA Protocol | As required | No less than 21 days, but no more than 90 days, before the anticipated test date[1] |
| RATA Results | As required | Within 45 days of end of test for Part 75 sources or within 60 days for all others[1] |

[1]If the due date falls on a federal or Nevada holiday, or on any day the office is not normally open for business, the submittal is due on the next regularly scheduled business day.
[2] Required only for stationary sources that emit 25 tons or more of nitrogen oxide ($NO_X$) and/or emit 25 tons or more of volatile organic compounds (VOC) during a calendar year.

17. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit emission limits, applicable permit requirements, and requirements of applicable federal regulations. *[AQR 4.1]*

## 4.5 MITIGATION

The source has no federal offset requirements. *[AQR 12.7]*

# *5.0 PERMIT SHIELD*

## *Permit Shield*

1. The source has requested a permit shield for applicable regulations in the following regulations (Table 5-1). *[AQR 12.5.2.9]*

**Table 5-1: Applicable Requirements Related to Permit Shield**

| Citation | Title |
|---|---|
| AQR 14.1(b)(40), Subpart GG | "Standards of Performance for Stationary Gas Turbines" |
| AQR 14.1(b)(84), Subpart KKKK | "Standards of Performance for Stationary Combustion Turbines" |

## *Streamlining*

2. Compliance with the terms contained in this permit shall be deemed compliance with the applicable requirements (Table 5-2) in effect on the date of permit issuance. *[AQR 12.5.2.9]*

**Table 5-2: Streamlined Requirements Related to Permit Shield**

| Regulation (40 CFR) | Pollutant | Regulatory Standard | Permit Limit | Value Comparison | | | Averaging Comparison | | | Shield Statement |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Standard Value, in Units of Permit Limit[1] | Permit Limit Value | Is Permit Limit Equal or More Stringent | Standard Averaging Period | Permit Limit Averaging Period | Is Permit Limit Equal or More Stringent | |
| **Turbines 5 through 8** | | | | | | | | | | |
| 60.332 (GG) | NOx | 75[1] ppmvd @ 15% $O_2$ | 5.0 ppmvd @ 15% $O_2$ | 75[1] | 5.0 | Yes | 4 hour | 1 hour | Yes | The permit limit is more stringent than the standard, based on both concentration and averaging time, therefore the facility should be shielded from the standard. |
| 60.333 (GG) | $SO_2$ | 0.15% by volume @15% $O_2$ | 1.62 lbs/hr | 830[2] | 1.62 | Yes | 4 hour | 1 hour | Yes | The permit limit is more stringent than the standard, based on both concentration and averaging time, therefore the facility should be shielded from the standard. |

| Regulation (40 CFR) | Pollutant | Regulatory Standard | Permit Limit | Value Comparison | | | Averaging Comparison | | | Shield Statement |
|---|---|---|---|---|---|---|---|---|---|---|
| | | | | Standard Value, in Units of Permit Limit[1] | Permit Limit Value | Is Permit Limit Equal or More Stringent | Standard Averaging Period | Permit Limit Averaging Period | Is Permit Limit Equal or More Stringent | |
| **Turbines 11 through 22** | | | | | | | | | | |
| 60.4330 (KKKK) | $SO_2$ | 0.06 lb/MMBtu | 0.00066 lb/MMBtu | 0.06 | 6.6 E-04 | Yes | N/A | N/A | Yes | The permit limit is more stringent than the standard, based on both concentration and averaging time, therefore the facility should be shielded from the standard. |

[1]The 60.332 NOx standard is a formula; the value used here (75 ppmvd) is the minimum possible value of the standard for any emission unit.
[2]Heat input used to calculate $SO_2$ standard value (in units of the permit limit) is the permit limit of 1081 MMBtu/hr.

# *6.0 ACID RAIN REQUIREMENTS*

1. In accordance with the provisions of Title IV of the Clean Air Act and 40 CFR Parts 72 through 77, an Acid Rain Permit was issued to Clark Generating Station, Las Vegas, Nevada.

2. All terms and conditions of the Acid Rain Permit are enforceable by DAQ and EPA under the Clean Air Act. *[40 CFR Part 72]*

3. The permittee shall comply with all the applicable requirements of the Acid Rain Permit application located in Attachment 9.2. *[40 CFR Part 72.30]*

4. This Acid Rain Permit incorporates the definitions of terms in 40 CFR Part 72.2.

5. This Acid Rain Permit is valid for a term of five years from the date of issuance unless a timely and complete renewal application is submitted to DAQ. *[40 CFR Part 72.69]*

6. A timely renewal application for an Acid Rain Permit is an application that is received at least six months prior to the permit expiration date. *[40 CFR Part 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 Part 70.6(a)(4)]*

8. Where an applicable requirement of the Act is more stringent than an applicable requirement of Title IV regulations, both provisions shall be incorporated into the permit and shall be enforceable. *[40 CFR Part 70.6(a)(1)(ii)]*

# *7.0 OTHER REQUIREMENTS*

1. Any person who violates any provision of the AQRs, 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 from DAQ is guilty of a civil offense and shall pay a 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; NRS 445B.640]*

2. Any person aggrieved by an order issued pursuant to AQR 9.1 is entitled to review, as provided in Chapter 233B of the NRS. *[AQR 9.12]*

3. The permittee shall comply with the requirements of Title 40, Part 61 of the Code of Federal Regulations (40 CFR Part 61), Subpart M—the National Emission Standard for Asbestos—for all demolition and renovation projects. *[AQR 13.1(b)(8)]*

4. 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 Class I or Class II ozone-depleting substance or any nonexempt substitute refrigerant as a working fluid, unless such fluid has been approved for sale in such use by the EPA Administrator. The permittee shall keep records of all paperwork relevant to the applicable requirements of 40 CFR Part 82 on-site. *[40 CFR Part 82]*

5. A risk management plan is required for the storing, handling and use of an applicable "Highly Hazardous Chemical" pursuant to 40 CFR Part 68. The permittee shall submit revisions of the risk management plan to the appropriate authority and a copy to DAQ. *[40 CFR Part 68.150(b)(3)]*

# *8.0 ADMINISTRATIVE REQUIREMENTS*

## 8.1 GENERAL

1. The permittee shall comply with all conditions of the Part 70 OP. Any permit noncompliance may constitute a violation of the Clark County Air Quality Regulations (AQRs), Nevada law, and the Clean Air Act, and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a 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 be unaffected and remain valid. *[AQR 12.5.2.6(f)]*

3. The permittee shall pay all permit fees pursuant to AQR 18. *[AQR 12.5.2.6(h)]*

4. This permit does not convey 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 any authorized representative of 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 4.1; AQR 5.1.1; and AQR 12.5.2.8(b)]*

6. The permittee shall allow the Control Officer, upon presentation of credentials, to: *[AQR 4.1 and AQR 12.5.2.8(b)]*

    a. Access 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 such devices as cameras or video equipment.

7. Any permittee who fails to submit relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit the needed 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 a complete application was filed but prior to release of a draft permit. A Responsible Official shall certify the additional information consistent with the requirements of AQR 12.5.2.4. *[AQR 12.5.2.2]*

8. Anyone issued a permit under AQR 12.5 shall post it in a location where it is clearly visible and accessible to facility employees and DAQ representatives. *[AQR 12.5.2.6(m)]*

9. 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)]*

## 8.2 MODIFICATION, REVISION, AND 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 Authority to Construct (ATC) from the Control Officer. *[AQR 12.4.1.1(a)]*

2. The permit may be revised, revoked, reopened and reissued, or terminated for cause by the Control Officer. 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. The permit shall be reopened under any of the following circumstances and when all applicable requirements pursuant to AQR 12.5.2.15 are met: *[AQR 12.5.2.15(a)]*

    a. New applicable requirements become applicable to a stationary source considered "major" (per the definition in AQR 12.2, AQR 12.3, or 40 CFR Part 70.3(a)(1)) with a remaining permit term of three or more years;

    b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the Acid Rain Program;

    c. The Control Officer or U.S. Environmental Protection Agency (EPA) determines that the permit contains a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

    d. The EPA Administrator or the Control Officer determines that the permit must be revised or revoked to assure compliance with applicable requirements.

4. 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 a complete application need not be received before a Part 70 general permit is issued pursuant to AQR 12.5.2.20); and

    b. The conditions of the permit provide for compliance with all applicable requirements and the requirements of AQR 12.5.

5. 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 that would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR Part 60.12]*

6. 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)]*

7. 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)]*

8. For purposes of permit renewal, a timely application is a complete application that is submitted at least six months, but not more than 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)]*

# *9.0 ATTACHMENTS*

## 9.1 APPLICABLE REGULATIONS

*Requirements Specifically Identified as Applicable*

4. NRS, Chapter 445B.

5. Applicable AQRs listed in Table 9-1.

**Table 9-1: Applicable Clark County AQRs**

| Citation | Title |
|---|---|
| AQR 0 | "Definitions" |
| AQR 1 | "Definitions" |
| AQR 04 | "Control Officer" |
| AQR 05 | "Interference with Control Officer" |
| AQR 06 | "Injunctive Relief" |
| AQR 07 | "Hearing Board and Hearing Officer" |
| AQR 08 | "Persons Liable for Penalties – Punishment: Defense" |
| AQR 09 | "Civil Penalties" |
| AQR 12.0 | "Applicability and General Requirements" |
| AQR 12.2 | "Permit Requirements for Major Sources in Attainment Areas" |
| AQR 12.3 | "Permit Requirements for Major Sources in Nonattainment Areas" |
| AQR 12.4 | "Authority to Construct Application and Permit Requirements for Part 70 Sources" |
| AQR 12.5 | "Part 70 Operating Permit Requirements" |
| AQR12.6 | "Confidentiality" |
| AQR 12.7 | "Emission Reduction Credits" |
| AQR 12.9 | "Annual Emissions Inventory Requirement" |
| AQR 12.10 | "Continuous Monitoring Requirements for Stationary Sources" |
| AQR 12.12 | "Transfer of Permit" |
| AQR 12.13 | "Posting of Permit" |
| AQR 12.14 | "Regional Haze Requirements" |
| AQR 13.2(b)(1) | Delegated Program: "Subpart A - General Provisions" |
| AQR 13.2(b)(82) | Delegated Program: "Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines" |
| AQR 13.2(b)(106) | Delegated Program: "Subpart CCCCCC - National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities" |
| AQR 14.1(b)(1) | Delegated Program: "Subpart A – General Provisions" |
| AQR 14.1(b)(40) | Delegated Program: "Subpart GG – Standards of Performance for Stationary Gas Turbines" |
| AQR 14.1(b)(82) | Delegated Program: "Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" |

| Citation | Title |
|---|---|
| AQR 14.1(b)(84) | Delegated Program: “Subpart KKKK – Standards of Performance for Stationary Combustion Turbines” |
| AQR 18 | “Permit and Technical Service Fees” |
| AQR 21 | “Acid Rain Permits” |
| AQR 22 | “Acid Rain Continuous Emission Monitoring” |
| AQR 25 | “Affirmative Defense for Excess Emissions due to Malfunctions, Startup, and Shutdown” |
| AQR 26 | “Emission of Visible Air Contaminants” |
| AQR 28 | “Fuel Burning Equipment” |
| AQR 40 | “Prohibitions of Nuisance Conditions” |
| AQR 41 | “Fugitive Dust” |
| AQR 42 | “Open Burning” |
| AQR 43 | “Odors in the Ambient Air” |
| AQR 53 | “Oxygenated Gasoline Program” |
| AQR 70 | “Emergency Procedures” |
| AQR 80 | “Circumvention” |
| AQR 81 | “Provisions of Regulation Severable” |
| AQR 102 | “Gasoline Dispensing Facilities” |
| AQR 122 | “Reasonably Available Control Technology for Major Sources in HA 212” |

6. Clean Air Act Amendments (42 U.S.C. § 7401, et seq.)

7. Applicable 40 CFR sections are listed in Table 9-2.

**Table 9-2: Federal Standards**

| Citation | Title |
|---|---|
| 40 CFR Part 60, Subpart A | “General Provisions” |
| 40 CFR Part 60, Subpart GG | “Standards of Performance for Stationary Gas Turbines” |
| 40 CFR Part 60, Subpart IIII | “Standards of Performance for Stationary Compression Ignition Internal Combustion Engines” |
| 40 CFR Part 60, Subpart KKKK | “Standards of Performance for Stationary Combustion Turbines” |
| 40 CFR Part 63, Subpart A | “General Provisions” |
| 40 CFR Part 63, Subpart CCCCCC | “National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities” |
| 40 CFR Part 63, Subpart ZZZZ | “National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines” |
| 40 CFR Part 64 | “Compliance Assurance Monitoring” |
| 40 CFR Part 70 | “State Operating Permit Programs” |
| 40 CFR Part 72 | “Permits Regulation” – Acid Rain Program |
| 40 CFR Part 73 | “Sulfur Dioxide Allowance System” – Acid Rain Program |
| 40 CFR Part 75 | “Continuous Emission Monitoring” – Acid Rain Program |
| 40 CFR Part 82 | “Protection of Stratospheric Ozone” |

## 9.2 ACID RAIN PERMIT

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Approval expires 05/31/2025

# Acid Rain Permit Application

For more information, see instructions and 40 CFR 72.30 and 72.31.

This submission is: ☐ new ☐ revised ■ for ARP permit renewal

**STEP 1**

**Identify the facility name, State, and plant (ORIS) code.**

| Facility (Source) Name | State | Plant Code |
|---|---|---|
| Clark Station | Nevada | 2322 |

**STEP 2**

**Enter the unit ID# for every affected unit at the affected source in column "a."**

| a | b |
|---|---|
| Unit ID# | Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1) |
| 11A | Yes |
| 11B | Yes |
| 12A | Yes |
| 12B | Yes |
| 13A | Yes |
| 13B | Yes |
| 14A | Yes |
| 14B | Yes |
| 15A | Yes |
| 15B | Yes |
| 16A | Yes |
| 16B | Yes |
| 17A | Yes |
| 17B | Yes |
| 18A | Yes |
| 18B | Yes |
| 19A | Yes |
| 19B | Yes |
| 20A | Yes |
| 20B | Yes |

EPA Form 7610-16 (Revised 07-2022)

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258
Approval expires 05/31/2025

# Acid Rain Permit Application

For more information, see instructions and 40 CFR 72.30 and 72.31.

This submission is: ☐ new ☐ revised ■ for ARP permit renewal

**STEP 1**

**Identify the facility name, State, and plant (ORIS) code.**

| Facility (Source) Name | State | Plant Code |
|---|---|---|
| Clark Station | Nevada | 2322 |

**STEP 2**

**Enter the unit ID# for every affected unit at the affected source in column "a."**

| a | b |
|---|---|
| Unit ID# | Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1) |
| 21A | Yes |
| 21B | Yes |
| 22A | Yes |
| 22B | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |
| | Yes |

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Clark Station
Facility (Source) Name (from STEP 1)



**STEP 3**

**Read the standard requirements.**

**Permit 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 sourceshall:
   (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).
(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.

Clark Station
Facility (Source) Name (from STEP 1)

STEP 3, Cont'd.

**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;
   (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.

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Acid Rain - Page 4

| Clark Station |
| --- |
| Facility (Source) Name (from STEP 1) |

**STEP 3, Cont'd.**

**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 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.

**STEP 4**

**Certification**

**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 | Jason Hammons | |
| --- | --- | --- |
| Signature |  | Date 12/9/2024 |

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