



## PART 70 OPERATING PERMIT

**SOURCE ID: 00391**

PanWest NCA2 Holdings LLC  
8000 East Lake Mead Boulevard  
Las Vegas, Nevada 89156

**ISSUED ON: March 21, 2022**

**EXPIRES ON: March 20, 2027**

**Current action: Administrative Revision**

**Revised On: January 14, 2026**

**Issued to:**

PanWest NCA 2 Holdings LLC  
6895 East Lake Mead Boulevard  
Suite 6  
Las Vegas, Nevada 89156

**Responsible Official:**

Chris Benkman  
Plant Manager  
PHONE: (702) 651-1275  
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**NATURE OF BUSINESS:**

SIC code 4931, "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

PanWest NCA2 Holdings LLC (NCA 2) is a topping cycle cogeneration plant under SIC Code 4931: Electric Cogeneration and NAICS Code 221112: Fossil Fuel Electric Power Generation. The source is located in hydrographic area 215 (Black Mountains Area). For New Source Review purposes (NSR) the source is a major stationary source of NO<sub>x</sub> and CO and is minor source of PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub> and VOC pollutants. The source exceeds the Title V thresholds for NO<sub>x</sub> and CO and is subject to its requirements. The source also emits greenhouse gas pollutants. The Black Mountains hydrographic area is classified as attainment for all criteria air pollutants. This source is a fossil fuel-fired steam electric plant with an electrical generating capacity over 250 MMBtu/hr, thus, the source is a categorical source as defined by AQR 12.2.2(j)(1).

NCA 2 has a generation capacity of 85 megawatts of electricity. The source operates three natural gas-fired turbine generator packages that exhaust into heat recovery steam generator (HRSG) units, each equipped with a 77 MMBtu/hr supplemental duct burner. A nominal 29.74 MW steam turbine generator is operated to produce electrical power. Other onsite emission units include a diesel-powered emergency generator, a diesel-powered emergency fire pump, a diesel-powered water pump, and a two-cell cooling tower.

The following table summarizes the source PTE for each regulated air pollutant from the emission units addressed in this Part 70 OP:

**Source-wide PTE (tons per year)**

| Pollutants | PM <sub>10</sub> | PM <sub>2.5</sub> | NO <sub>x</sub> | CO            | SO <sub>2</sub> | VOC          | HAP         | GHG            |
|------------|------------------|-------------------|-----------------|---------------|-----------------|--------------|-------------|----------------|
| PTE Totals | <b>67.41</b>     | <b>61.03</b>      | <b>170.99</b>   | <b>142.39</b> | <b>9.10</b>     | <b>26.79</b> | <b>6.04</b> | <b>505,548</b> |

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

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## I. ACRONYMS

### Acronyms and Abbreviations

|                   |   |
|-------------------|---|
| AQR               | Clark County Air Quality Regulations          |
| BACT              | Best Available Control Technology             |
| CAA               | Clean Air Act, as amended                     |
| CEMS              | Continuous Emissions Monitoring System        |
| CFC               | chlorofluorocarbon                            |
| CFR               | United States Code of Federal Regulations     |
| CO                | carbon monoxide                               |
| CTG               | combustion turbine-generator                  |
| DAQ               | Division of Air Quality                       |
| DLN               | dry low-NO <sub>x</sub>                       |
| EPA               | United States Environmental Protection Agency |
| EU                | emission unit                                 |
| HAP               | hazardous air pollutant                       |
| HCFC              | hydrochlorofluorocarbon                       |
| HHV               | higher heating value                          |
| HP                | horse power                                   |
| HRSG              | heat recovery steam generator                 |
| kW                | Kilowatt                                      |
| LHV               | lower heating value                           |
| MMBtu             | Millions of British Thermal Units             |
| MN                | model number                                  |
| MW                | Megawatt                                      |
| NAICS             | North American Industry Classification System |
| NO <sub>x</sub>   | nitrogen oxides                               |
| NRS               | Nevada Revised Statutes                       |
| OP                | Part 70 operating permit                      |
| PM <sub>2.5</sub> | particulate matter less than 2.5 microns      |
| PM <sub>10</sub>  | particulate matter less than 10 microns       |
| ppm               | parts per million                             |
| ppmvd             | parts per million, volumetric dry             |
| PTE               | potential to emit                             |
| RATA              | relative accuracy test audits                 |
| S                 | Sulfur  |
| SCC               | Source Classification Codes                   |
| scf               | standard cubic feet                           |
| SIC               | Standard Industrial Classification            |
| SIP               | state implementation plan                     |
| SN                | serial number                                 |
| SO <sub>2</sub>   | sulfur dioxide                                |
| ULN               | ultra low-NO <sub>x</sub>                     |
| VOC               | volatile organic compound                     |

## II. GENERAL CONDITIONS

### A. General Requirements

1. The permittee shall comply with all conditions of the Part 70 Operating Permit (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; AQR 12.5.2.8(b)]*
6. The permittee shall allow the Control Officer, upon presentation of credentials, to: *[AQR 4.1 & 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)]*

## **B. 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. 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.
4. The permittee shall not build, erect, install, or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission that would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR Part 60.12]*
5. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit. *[AQR 12.5.2.6(i)]*
6. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. *[AQR 12.5.2.11(b)]*
7. For purposes of permit renewal, a timely application is a complete application that is submitted at least six 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)]*

## **C. Reporting, Notifications, and Information Requirements**

1. 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)]*
2. 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)]*

3. 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)]*
4. Upon request of the Control Officer, 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]*
5. 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 Saturday or Sunday, or on a Nevada or federal holiday, the submittal shall be due on the next regularly scheduled 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).
6. Stationary sources that emit 25 tons or more of nitrogen oxide (NOx) and/or 25 tons or more of volatile organic compounds (VOCs) during a calendar year from emission units, insignificant activities, and exempt activities shall submit an annual emissions statement for both pollutants. This statement 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 (i.e., the emissions inventory). *[AQR 12.9.1]*

#### **D. Compliance Requirements**

1. The permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. *[AQR 12.5.2.6(g)(2)]*
2. Any person who violates any provision of 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]*
3. 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]*
4. 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)]*
5. 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)]*
6. 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.

7. 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](mailto:airquality@clarkcountynv.gov).
  - b. Within 72 hours of the notification required by paragraph (a) above, the permittee shall submit a detailed written report to DAQ containing the information required by AQR 25.6.3.
8. 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)]*
9. 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]*

## **E. Performance Testing Requirements**

1. Upon request of the Control Officer, 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. Upon request of the Control Officer, the permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. *[AQR 4.2]*
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 Section III.E of 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. 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]*

### III. EMISSION UNITS AND APPLICABLE REQUIREMENTS

#### A. Emission Units

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

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

| EU    | Description                                | Rating                     | Make             | MN                   | SN            |
|-------|--|----------------------------|------------------|----------------------|---------------|
| A001  | Turbine Generator Package #1               | 22.2 MW<br>285<br>MMBtu/hr | General Electric | LM-2500<br>PE MG5602 | 260156-1      |
| A001a | Supplemental Duct Burner                   | 77<br>MMBtu/hr             | Coen             |                      | BM ALPHA      |
| A002  | Turbine Generator Package #2               | 22.2 MW<br>285<br>MMBtu/hr | General Electric | LM-2500<br>PE MG5602 | 260156-2      |
| A002a | Supplemental Duct Burner                   | 77<br>MMBtu/hr             | Coen             |                      | BM BRAVO      |
| A003  | Turbine Generator Package #3               | 22.2 MW<br>285<br>MMBtu/hr | General Electric | LM-2500<br>PE MG5602 | 260156-3      |
| A003a | Supplemental Duct Burner                   | 77<br>MMBtu/hr             | Coen             |                      | BM CHARLIE    |
| A004  | Diesel Emergency Fire Pump. DOM: Pre- 2006 | 265 hp                     | Detroit Diesel   | DDFP-L6AT-7017       | 6A-466677     |
| A005  | Diesel Emergency Engine. DOM: Pre-2006     | 487 hp                     | Caterpillar      | 3406B D1             | 2WB08259      |
| A006  | Cooling Tower, 2-celled                    | 26,600<br>gpm total        | Ecodyne          | 2CFF60595L2610-20    | DO0-15664-A   |
| A007  | Diesel-Fired Water Pump. DOM: Pre-2006     | 80 hp                      | John Deere       | 4045DF150B           | T04045D819214 |
| A009  | AST; Gasoline                              | 1,000<br>Gallons           | Air Boy          |                      |               |

The units in Table III-A-2 are present at this source, but are insignificant activities pursuant to AQR Section 12.5. 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. [AQR 12.5.2.5]

**Table III-A-2: List of Insignificant Activities**

|  |
|--|
| Aboveground diesel storage tank, 250,000 gallons     |
| Anhydrous Ammonia Storage Tanks                      |
| Generator Lube Oil Tank, 215 gallons                 |
| Steam Turbine Lube Oil Tank                          |
| Steam Turbine Lube Oil Conditioner Tank, 270 gallons |
| Oil/Water Sump                                       |
| Generator Lube Oil Tank                              |
| Steam Turbine Lube Oil Tank, 1,150 gallons           |
| Steam Turbine Lube Oil Tank, 2,150 gallons           |
| Steam Turbine Lube Oil Tank, 3,150 gallons           |

|  |
|--|
| Diesel aboveground storage tank, 350 gallons (Fire Water Pump) |
| Steam and Water Treatment                                      |
| Evaporation Pond   |
| Maintenance Operations   |

## B. 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; 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. Records of location changes for portable or transportable nonroad engines shall be maintained, and shall be made available to the Control Officer upon request. These records are not required for engines owned and operated by a contractor for maintenance and construction activities as long as records are maintained 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 this 12-month limitation or the associated recordkeeping requirements.

## C. Emissions Limitation and Standards

### 1. Emission Limits

a. The permittee shall not allow the actual emissions from each emission unit to exceed the PTE listed in Tables III-C-1, except for emission units intended only for use in emergencies, in any consecutive 12-month period. Tons per year emission limits for each emission unit include startup and shutdown emissions. *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.6(a)]*

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

| EU                        | Condition   | PM <sub>10</sub> | PM <sub>2.5</sub> | NO <sub>x</sub> (SCR) <sup>2</sup> | NO <sub>x</sub> (no SCR) | CO    | SO <sub>2</sub> | VOC  |
|---------------------------|-------------|------------------|-------------------|------------------------------------|--------------------------|-------|-----------------|------|
| A001 & A001a <sup>1</sup> | 8,760 hr/yr | 17.00            | 17.00             | 40.77                              | 14.13                    | 46.71 | 3.03            | 8.75 |
| A002 & A002a <sup>1</sup> | 8,760 hr/yr | 17.00            | 17.00             | 40.77                              | 14.13                    | 46.71 | 3.03            | 8.75 |
| A003 & A003a <sup>1</sup> | 8,760 hr/yr | 17.00            | 17.00             | 40.77                              | 14.13                    | 46.71 | 3.03            | 8.75 |
| A004                      | 500 hr/yr   | 0.33             | 0.33              | 0                                  | 3.33                     | 1.16  | 0.01            | 0.07 |
| A005                      | 500 hr/yr   | 0.07             | 0.07              | 0                                  | 2.07                     | 0.40  | 0.01            | 0.03 |
| A006                      | 8,760 hr/yr | 15.96            | 9.58              | 0                                  | 0                        | 0     | 0               | 0    |
| A007                      | 720 hr/yr   | 0.01             | 0.01              | 0                                  | 0.38                     | 0.11  | 0.06            | 0.03 |
| A009                      | 9,000 gal   | 0                | 0                 | 0                                  | 0                        | 0     | 0               | 0.06 |

<sup>1</sup>Limits based on a 3-hour averaging period.

b. The permittee shall not allow the actual emissions from each emission unit to exceed the calculated emission rates listed in Tables III-C-2 during normal operation (exclude startup and shutdown). *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.6(a)]*

**Table III-C-2: Emission Rates, Excluding Startup and Shutdowns (pounds per hour)<sup>1</sup>**

| EU          | PM <sub>10</sub> | PM <sub>2.5</sub> | NO <sub>x</sub> (SCR) | NO <sub>x</sub> (no SCR) | CO    | SO <sub>2</sub> | VOC  |
|-------------|------------------|-------------------|-----------------------|--------------------------|-------|-----------------|------|
| A001, A001a | 3.88             | 3.88              | 10.30                 | 21.50                    | 10.70 | 0.69            | 2.00 |
| A002, A002a | 3.88             | 3.88              | 10.30                 | 21.50                    | 10.70 | 0.69            | 2.00 |
| A003, A003a | 3.88             | 3.88              | 10.30                 | 21.50                    | 10.70 | 0.69            | 2.00 |

<sup>1</sup> Based on a 3-hour averaging period.

- c. The permittee shall not allow the actual emissions from each emission unit to exceed the calculated emission rates and concentrations listed in Tables III-C-3. Pound-per-hour limits and ppm limits are normal operation (exclude startup and shutdown) limits only. [NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.6(a)]

**Table III-C-3: Emission Rates and Concentrations, Excluding Startup and Shutdown in ppmvd @ 15% O<sub>2</sub>**

| EU                        | Control                  | PM <sub>10</sub> | NO <sub>x</sub> | CO       | VOC             |
|---------------------------|--------------------------|------------------|-----------------|----------|-----------------|
| A001-A003,<br>A001a-A003a | With SCR <sup>1</sup>    | 3.88 lb/hr       | 12 ppmvd        | 23 ppmvd | 0.0077 lb/MMBtu |
| A001-A003,<br>A001a-A003a | Without SCR <sup>1</sup> | 3.88 lb/hr       | 25 ppmvd        | 23 ppmvd | 0.0028 lb/MMBtu |

<sup>1</sup> Limits based on a 3-hour averaging period.

- d. The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than 6 consecutive minutes. [AQR 26.1]
- e. The permittee shall not allow NO<sub>x</sub> emissions from the stack of each turbine to exceed 25 ppmvd @ 15 percent oxygen as measured on a 3-hour rolling average during periods when the SCR is not operational. [NSR ATC, Modification 5, Condition E-6 (3/9/99), NSR ATC/OP 391, Modification 7, Revision 1 (10/17/07) and AQR 12.5.2.6(a)]
- f. The permittee shall not allow NO<sub>x</sub> emissions from the stack of each turbine to exceed 12 ppmvd @ 15 percent oxygen as measured on a 3-hour rolling average during all times when the SCRs are in use. [NSR ATC, Modification 5, Condition E-7 (3/9/99), and NSR ATC/OP 391, Modification 7, Revision 1 (10/17/07) and AQR 12.5.2.6(a)]
- g. The permittee shall not burn in any stationary gas turbine any fuel which contains sulfur over 0.8 percent by weight (8,000 ppmw). [40 CFR Part 60.334(b)]

## 2. Operational Limits

### Turbines and Duct Burners

- a. The permittee shall limit operation of each turbine package (EUs: A001-A003) to a maximum heat input rating of 285 MMBtu/hr, based on an LHV of the natural gas at 67° F. [NSR ATC/OP 391, Modification 7, Revision 1 (10/17/07) and AQR 12.5.2.6(a)]
- b. Beginning January 1, 2026, NCA 2 is subject to the requirements of the Acid Rain Program. [Application for a Part 70 Administrative Revision (12/3/2025)]
- c. A shut-down period shall not exceed one (1) hour immediately following the initiation of a combustion gas turbine shutdown. A shutdown ends when combustion ceases in the gas turbine or upon initiation of a new startup, if combustion during the preceding shutdown has not terminated. A NO<sub>x</sub> emission exceedance event resulting from a loss of NO<sub>x</sub> steam injection that

is caused by upsets in process gas export will be treated as a shutdown and, if the affected gas turbine(s) do not completely shut down within one (1) hour, the time immediately following such an upset in export gas shall be treated as a start-up period and reported as a start-up event. *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07)]*

- d. Startup is defined as the period of no more than two (2) hours immediately following the starting of the combustion gas turbine. The permittee shall limit startups of the turbines to 300 events per month, and the total cumulative start-up time shall not exceed 450 hours per calendar month for the facility. *[NSR ATC, Modification 5, Condition E-10 (3/9/99), and NSR ATC/OP 391, Modification 7, Revision 1(10/17/07)]*
- e. The permittee shall limit each startup period to 120 minutes. *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.6(a)]*
- f. The permittee shall limit the heat input for each duct burner to 77 MMBtu/hour (EU: A001a, A002a, and A003a). *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07)]*

#### Engines

- g. The permittee shall limit the operation of the fire pump (EU: A004) and the emergency generator (EU: A005) each for testing and maintenance purposes to 100 hours per year. The permittee may operate the engines up to 50 hours per year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. The 50 hours per year for nonemergency situations cannot be used for peak shavings or demand response, except as provided in 40 CFR 63.6640(f)(4). *[40 CFR 63.6640]*
- h. The permittee shall limit operation of the water pump (EU: A007) to 720 hours per any consecutive 12-month period. *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.6(a)]*

#### GDO

- i. The permittee shall limit the throughput of all gasoline products to 9,000 gallons per any consecutive 12-month period (EU: A009) *[NSR ATC/OP 391, Modification 7, Revision 1 (10/17/07) and AQR 12.5.2.6(a)]*

### **3. Emission Controls**

#### Turbines and Duct Burners

- a. The permittee shall operate the selective catalytic reduction (SCR) systems installed on the gas turbine units (EU: A001 through A003) a minimum of 85 percent of the plant operating hours calculated over a consecutive 12-month period with an allowance of no more than 15 percent downtime due to low-temperature excursions. Low-temperature excursions are defined as temporary temperature drops below 570°F. The permittee shall determine the operating hours by averaging across the three (3) units at the source. *[NSR ATC, Modification 5, Condition E-6 (3/9/99) and NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.3(c)]*
- b. The permittee shall continuously operate steam injection as long as the temperature in a gas turbine's associated heat recovery steam generator remains at or above 550°F or the pressure of the recovery boiler remains at or above 410 pounds per square inch as measured by a calibrated gauge (psig). *[NSR ATC, Modification 5, Condition E-10 (3/9/99), NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.3(c)]*

- c. The permittee shall commence ammonia injection during startup and within five (5) minutes after the SCR inlet's temperature reaches 570°F. *[NSR ATC, Modification 5, Condition E-11 (3/9/99) and AQR 12.5.2.3(c)]*
- d. The permittee shall control the ammonia flow using the continuous monitoring system which will limit NOx to 12 ppmvd @ 15 percent O2, on a 3-hour rolling average. *[NSR ATC, Modification 5, Condition E-7 (3/9/99) and NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.3(c)]*
- e. The permittee shall maintain and operate the oxidation catalysts for the control of CO on each of the turbine units and shall maintain and operate in accordance with manufacturer's specifications (EUs: A001 through A003). *[AQR 12.5.2.3(c)]*
- f. The permittee shall operate the oxidation catalysts at all times the associated turbine units are operating, excluding periods of startup and shutdown. *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.3(c)]*
- g. The permittee shall control SO2 exhaust emissions from each combined cycle system (EUs: A001 through A003) by exclusively using of pipeline quality natural gas in accordance with the Federal Energy Regulatory Commission, and good combustion practice. *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.3(c)]*
- h. The permittee shall control PM10 exhaust emissions from each combined cycle system (EUs: A001 through A003) by properly maintaining the inlet air filters preceding each turbine as recommended by the manufacturer and good operating practice. *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.3(c)]*

Engines

- i. The permittee shall operate the fire pump with a turbocharger and aftercooler (EU: A004). *[NSR ATC/OP 391, Modification 6, (02/26/02) and AQR 12.5.2.3(c)]*
- j. The permittee shall operate the emergency generator with a turbocharger and aftercooler (EU: A005). *[NSR ATC/OP 391, Modification 6(02/26/02) and AQR 12.5.2.3(c)]*
- k. The permittee shall combust only low sulfur diesel fuel in the fire pump (EU: A004), the emergency generator (EU: A005), and the water pump (EU: A007). *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07)]*
- l. The permittee shall maintain the emergency generator and fire pump (EUs: A004 and A005, respectively) as follows, unless the manufacturer's specifications are more stringent: *[40 CFR 63.6603(b)]*
  - i. Change oil and filter every 500 hours of operation or annually, whichever comes first;
  - ii. Inspect air cleaners every 1,000 hours of operation or annually, whichever comes first;
  - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; and
  - iv. The permittee may utilize an oil analysis program as described in Subpart 63.6625(i) in order to extend the specified oil change requirement and can petition the Control Officer pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.
- m. The permittee shall maintain the water pump (EU: A007) as follows, unless the manufacturer's specifications are more stringent: *[40 CFR 63.6603(b)]*
  - i. Change oil and filter every 1,000 hours of operation or annually, whichever comes first;
  - ii. Inspect air cleaners every 1,000 hours of operation or annually, whichever comes first;

- iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; and
- iv. The permittee may utilize an oil analysis program as described in Subpart 63.6625(i) in order to extend the specified oil change requirement and can petition the Control Officer pursuant to the requirements of 40 CFR 63.6(g) for alternative work practices.

GDO

- n. The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following [40 CFR 63.11116]:
  - i. Minimize gasoline spills;
  - ii. Clean up spills as expeditiously as practicable;
  - iii. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
  - iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators;
  - v. The permittee shall have records documenting gasoline throughput within 24 hours of a request of the control officer; and
  - vi. The permittee must comply with the requirements of the 40 CFR 63, subpart CCCCCC by January 10, 2011.

Cooling Tower

- o. The permittee shall operate the cooling tower with a drift eliminator that has a manufacturer's maximum drift rate of 0.0007 percent (EUs: A006). *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.3(c)]*
- p. The permittee shall limit the total dissolved solids (TDS) concentration in the cooling tower process water at or below 57,750 ppm at all times. The annual average TDS concentration shall not exceed 38,500 ppm based on consecutive 12-month total (EU A006). *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.3(c)]*
- q. The permittee shall operate and maintain the cooling tower in accordance with the manufacturer's specifications (EU A006). *[AQR 12.5.2.3(c)]*

**D. Monitoring**

Visible Emissions [AQR 12.5.2.6(d) and 40 CFR 70.6]

- 1. 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.
- 2. The permittee shall conduct a visual emissions check at least quarterly on the fire pump (EU: A004), the diesel water pump (EU: A007), and the diesel generator (EU: A005) while in operation and in accordance with the procedures outlined in the Visible Emissions Check Guidebook. If the fire pump, the water pump, or the diesel generator do not operate during the quarter, then no observation of that unit(s) shall be required.

3. 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.
4. 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.
5. Any scenario of visible emissions noncompliance can and may lead to enforcement action.

Turbines, Duct Burners and CEMS

6. To demonstrate continuous direct compliance with all emission limitations for NO<sub>x</sub> and CO specified in this permit, the permittee shall install, calibrate, maintain, operate, and certify

CEMS for NO<sub>x</sub>, CO, and O<sub>2</sub> on each turbine unit in accordance with 40 CFR 75, Appendix B and 40 CFR 60.13, as applicable (EUs: A001 through A003). Each CEMS shall include an automated data acquisition and handling system. Each system shall monitor and record at least the following data: *[NSR ATC, Modification 5, Condition H-1 (3/9/99), AQR 12.5.2.6(d)]*

- a. Exhaust gas concentrations (in ppm) of NO<sub>x</sub>, CO, and diluent O<sub>2</sub> for all turbine units (EUs: A001 through A003) at least once every 15 minutes when required by 40 CFR 60 or 40 CFR 75, as appropriate;
- b. Exhaust gas flow rate (by direct or indirect methods);
- c. Fuel flow rate;
- d. Hours of operation;
- e. Three-hour rolling averages of each NO<sub>x</sub> and CO concentrations;
- f. Hourly, daily, and quarterly accumulated mass emissions (in pounds) of NO<sub>x</sub> and CO; and
- g. Hours of downtime of the CEMS;
- h. Catalyst inlet temperature at each SCR unit; and
- i. Temperature and pressure of each heat recovery boiler which produces steam.

7. The permittee shall monitor the monthly fuel consumption of the duct burners (EUs: A001a through A003a).
8. The permittee shall follow a written quality control program plan for the CEMS dated November 2025 that describes in detail complete, step-by-step procedures and operations contained in 40 CFR 75, Appendix B, Part 1 (Quality Control Program). The requirements of 40 CFR 75, Appendix B, and Section 2.3.4 (Bias Adjustment Factor) will apply to this source beginning January 1, 2026, with participation in the Part 75 program. *[Application for a Part 70 Administrative Revision (12/3/2025)]*
9. The permittee shall conduct periodic audits and implement QA/QC procedures for CEMS conforming to the provisions of 40 CFR 75, Appendix B. *[NSR ATC, Modification 5, Condition H-4 (3/9/99)]*
10. The permittee shall conduct RATA of the CO, NO<sub>x</sub>, and diluents O<sub>2</sub> CEMS at least annually. *[AQR 12.5.2.6(d)]*
11. The permittee shall perform RATA of the NO<sub>x</sub> and diluent monitors individually or in combination, i.e., the relative accuracy tests of the CEMS may be performed: *[40 CFR Part 60.334(b)(1)]*
  - a. On a ppm basis for NO<sub>x</sub> and a percent O<sub>2</sub> basis for oxygen; or
  - b. On a ppm at 15% O<sub>2</sub> basis; or
  - c. On a ppm basis for NO<sub>x</sub> and a percent CO<sub>2</sub> basis for a CO<sub>2</sub> monitor that uses the procedures in Method 20 to correct the NO<sub>x</sub> data to 15% O<sub>2</sub>.
12. The permittee shall, as specified in 40 CFR Part 60.13(e)(2), during each full unit operating hour, ensure that each monitor completes a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute period to validate the hour. For partial unit operating hours, at least one valid data point must be obtained for each 15-minute period in which the unit operates. For unit operating hours in which required quality assurance and maintenance activities are performed on the CEMS, a minimum of two valid data points (one

in each of two distinct 15-min. periods) are required to validate the hour. [40 CFR Part 60.334(b)(2)]

13. The permittee shall, to identify excess emissions, reduce CEMS data to hourly averages, as specified in 40 CFR Part 60.13(h). [40 CFR Part 60.334(b)(3)]

- a. For each unit operating hour in which a valid hourly average, as described in paragraph 40 CFR Part 60.334(b)(b)(2), is obtained for both NOx and diluent, the data acquisition and handling system must calculate and record the hourly NOx emissions in the units of the applicable NOx emission standard under 40 CFR Part 60.332(a), i.e., percent NOx by volume, dry basis, corrected to 15% O<sub>2</sub> and International Organization for Standardization (ISO) standard conditions (if required as given in 40 CFR Part 60.335(b)(1)). For any hour in which the hourly average O<sub>2</sub> concentration exceeds 19.0% O<sub>2</sub>, a diluent cap value of 19.0% O<sub>2</sub> may be used in emission calculations.
- b. A worst case ISO correction factor may be calculated and applied using historical ambient data. For this calculation, substitute the maximum humidity of ambient air (H<sub>o</sub>), minimum ambient temperature (T<sub>a</sub>), and minimum combustor inlet absolute pressure (P<sub>o</sub>) into the ISO correction equation.
- c. If the owner or operator has installed a NOx CEMS to meet the requirements of 40 CFR Part 75, and is continuing to meet the ongoing requirements of Part 75, the CEMS may be used to meet the requirements of this section, except that the missing data substitution methodology in 40 CFR Part 75, Subpart D is not required for identifying excess emissions. Instead, the permittee shall report periods of missing CEMS data as monitor downtime in the excess emissions and monitoring performance report required by 40 CFR Part 60.7(c).

14. The permittee shall monitor incidents of “out of control” periods of the CEMS. For each calendar quarter, each CEMS shall not have total “out-of-control” periods, as defined in 40 CFR 75, Appendix B, greater than two percent (2%) of the time its associated HRSG is in operation. [NSR ATC/OP 391, Modification 6,(02/26/02) and AQR 12.5.2.8]

15. The permittee shall demonstrate the gas quality characteristics using a current, valid purchase contract, tariff sheet, or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 gr/100 scf or less, if the gaseous fuel meets the definition of natural gas in 40 CFR Part 60.331(u). [40 CFR Part 60.334(h)(3)]

16. The permittee shall submit reports of excess emissions and monitor downtime in accordance with 40 CFR Part 60.7(c). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown, and malfunction. For reports required under 40 CFR Part 60.7(c), periods of excess emissions and monitor downtime that shall be reported are defined in 40 CFR 60.334(j)(1)(iii):

- a. NO<sub>x</sub> for turbines using NO<sub>x</sub> and diluent CEMS as follows:
- b. An hour of excess emissions shall be any unit operating hour in which the 4-hour rolling average NO<sub>x</sub> concentration exceeds the applicable emission limit in 40 CFR Part 60.332(a)(1) or (2). For the purposes of Subpart GG, a “4-hour rolling average NO<sub>x</sub> concentration” is the arithmetic average of the average NO<sub>x</sub> concentration measured by

the CEMS for a given hour (corrected to 15% O<sub>2</sub> and, if required under 40 CFR Part 60.335(b)(1), to ISO standard conditions) and the three unit operating hour average NO<sub>x</sub> concentrations immediately preceding that unit operating hour.

- c. A period of monitor downtime shall be any unit operating hour in which sufficient data are not obtained to validate the hour for the NO<sub>x</sub> concentration or diluent (or both).
- d. Each report shall include the ambient conditions (i.e., temperature, pressure, and humidity) at the time of the excess emission period and, if the owner or operator has claimed an emission allowance for fuel-bound nitrogen, the nitrogen content of the fuel during the period of excess emissions. Reporting ambient conditions is not required if the permittee opts to use the worst case ISO correction factor, as specified in 40 CFR Part 60.334(b)(3)(ii), or opts not to use the ISO correction equation under the provisions of 40 CFR Part 60.335(b)(1).

17. The permittee shall monitor and record (on a gross basis) each turbine's potential electrical output capacity supplied or actual electric output (in MWe-hr) sold annually to any utility power distribution system. *[40 CFR Part 72.6(b)(4)(ii)]*

Cooling Tower

- 18. The permittee shall monitor the TDS in the cooling tower circulating water daily. The permittee shall use the conductivity measurements for TDS monitoring or equivalent method approved in advance by the Control Officer. *[AQR 12.5.2.6(d)]*
- 19. If the daily test for TDS ppm is within 10 percent of exceeding the allowable concentrations (51,975 ppm), a second test must be completed within the 24-hour period. If the second test result is below 57,750 ppm, the two (2) tests shall be averaged together for the daily report in order to determine permit compliance. At no time shall the TDS test result exceed 57,750 ppm. *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07)]*

Engines

- 20. The permittee shall install and monitor a nonresettable hour meter on the diesel-powered fire pump and emergency generator (EUs: A004 and A005). *[AQR 12.5.2.6(d) and 40 CFR 63.6625(f)]*
- 21. The permittee shall install and monitor a nonresettable hour meter on the diesel-powered water pump (EU: A007). *[NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and 40 CFR 63.6625(f)]*
- 22. The permittee shall monitor the sulfur content, and cetane index or aromatic content of the fuel burned in the diesel-powered emergency fire pump and generator by retaining a copy of vendor fuel specifications (EUs: A004 and A005). *[AQR 12.5.2.6(a)]*

GDO

- 23. The permittee shall monitor and record the throughput of gasoline (EU: A009) in gallons to determine monthly combined throughput; each month, the permittee shall calculate the total of the last 365 days of gasoline throughput and divide by 12. *[AQR 12.5.2.6(d)]*

## **E. Testing**

1. The permittee shall follow performance testing requirements of 40 CFR Part 60 Subpart A; 40 CFR Part 60 Subpart GG; and DAQ's "*Guideline on Source Testing*". [AQR 12.5.2.6(d) and 40 CFR 60.335]
2. The Control Officer may require additional performance testing when operating conditions appear to be inadequate to demonstrate compliance with the limitations in this permit. [AQR 4.2]

## **F. Record Keeping**

1. The permittee shall maintain the following records on-site for reporting: [AQR 12.5.2.6(d) & AQR 12.5.2.8]

General

- a. 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;

Turbine/Duct Burner Units:

- b. Monthly, consecutive 12-month total quantity of natural gas consumed by each gas turbine (EUs: A001 through A003);
- c. Monthly, consecutive 12-month total quantity of natural gas fuel consumed by each duct burner (EUs: A001a-A003a).
- d. CEMS audit results, RATA (reported annually), and corrective actions as required by 40 CFR Part 60, Appendix F;

IC Engines (EUs: A004, A005 and A007):

- e. Date and duration of operation of the diesel-powered emergency generator and fire pump for testing, maintenance, and non-emergency use (EUs: A004 and A005);
- f. Date and duration of operation of the diesel-powered emergency generator and fire pump for emergency use, including documentation justifying use during the emergency (EUs: A004 and A005);
- g. Monthly, consecutive 12-month total hours of operation for the diesel-powered water pump (EU: A007);

Cooling Tower (EUs: A006):

- h. Annual average TDS content of the cooling tower; and

GDO (EU: A009):

- i. Monthly, consecutive 12-month total of gasoline throughput.

2. The permittee shall maintain the following records on-site: [AQR 12.5.2.6(d) & AQR 12.5.8]

General

- a. Log of visual emissions checks;
- b. Results of performance tests conducted within the last 5 years, if applicable;

- c. Manufacturer's operation specifications for SCR and oxidation catalyst controls;
- d. Sulfur content of natural gas;

Turbine, Duct Burners and CEMS

- e. Dates and hours of operation for each turbine using natural gas (EUs: A001–A003);
- f. Calculated NOx and CO emissions from the CEMS;
- g. Each CEMS “out-of-control” period, as defined in 40 CFR Part 75, Appendix B;
- h. Time, duration, nature, and probable cause of any CEMS downtime and corrective actions taken;
- i. Dates, times, and duration of each startup and shutdown event for each turbine (EUs: A001–A003);
- j. Records of supply of actual electric output to the utility power distribution system for sale (on a gross basis), as required by Section III-C-2(b);
- k. All CEMS and/or PEMS information required by the CEMS and/or PEMS monitoring plan, as specified in 40 CFR Part 75, Subpart F;
- l. A quality assurance plan containing auditing schedules, reporting schedules, and design specifications for the CEMS. The CEMS shall conform to all provisions of 40 CFR Part 60.13; 40 CFR Part 60, Subpart GG; and 40 CFR 75; [AQR 12.5.2.6(d)]

Engines

- m. Records of inspection and maintenance for the fire pump, emergency generator and the water pump (EUs: A004, A005 and A007);
- n. Dates and hours of operation for the diesel water pump engine (EU: A007); and

Cooling Tower (EUs: A006):

- o. Daily TDS test results of the cooling tower, averaged monthly per consecutive 12-month period.

3. The permittee shall include in each record above, where applicable, the date and time the monitoring or measurement was taken, the person performing the monitoring or measurement, and the emission unit or location where the monitoring or measurement was performed. Each record must also contain the action taken to correct any deficiencies, when applicable. [AQR 12.5.2.6(d)]
4. Records and data required by this operating permit to be maintained by permittee may, at the permittee's expense, be audited at any time by a third party selected by the Control Officer. [AQR 4.1 and AQR 12.5.2.8]
5. All records and logs, or a copy thereof, shall be kept on-site for a minimum of five (5) years from the date the measurement was taken or data was entered and shall be made available to Air Quality upon request. [AQR 12.5.2.6(d)]
6. The Control Officer reserves the right to require additional requirements concerning records and record keeping for this source. [AQR 12.5.2.6(d)]

## G. Reporting

1. All report submissions shall be addressed to the attention of the Control Officer. *[AQR 12.5.2.8(e)(4)]*
2. All reports shall contain the following: *[AQR 12.5.2.6(d) and AQR 12.5.2.6(l)]*
  - a. A certification statement on the first page, i.e., "I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document is true, accurate and complete." (A sample form is available from Air Quality); and
  - b. A certification signature from a responsible official of the company and the date certification.
3. The permittee shall submit semi-annual reports to the Control Officer. *[AQR 12.5.2.6(d)]*
4. The following requirements apply to semiannual reports: *[AQR 12.5.2.6(d)]*
  - a. The report shall include each item listed in Section III-F-1.
  - b. The report shall include semiannual summaries of any permit deviations, their probable cause, and corrective or preventative actions taken.
  - c. The report shall be submitted to DAQ within 30 calendar days after the reporting period.
5. Regardless of the date of issuance of this permit, the source shall comply with the schedule for report submissions outlined in Table III-G-1 *[AQR 12.5.2.6(d)]*:

**Table III-G-1: Required Report Submission Dates**

| Required Report  | Applicable Period                                    | Due Date  |
|--|--|---|
| Semiannual report for 1 <sup>st</sup> six-month period   | January, February, March, April, May, June           | July 30 each year <sup>1</sup>                            |
| Semiannual report for 2 <sup>nd</sup> six-month period; and any additional annual records required | July, August, September, October, November, December | January 30 each year <sup>1</sup>                         |
| Annual Compliance Certification  | Calendar year  | January 30 each year <sup>1</sup>                         |
| Annual Emissions Inventory Report  | Calendar year  | March 31 each year <sup>1</sup>                           |
| Annual Emissions Statement <sup>2</sup>  | Calendar year  | March 31 each year <sup>1</sup>                           |
| Notification of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission               | As required  | Within 24 hours of when the permittee learns of the event |
| Report of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emissions                    | As required  | Within 72 hours of the notification                       |
| Deviation Report without Excess Emissions  | As required  | Along with semiannual reports <sup>1</sup>                |
| Excess Emissions that Pose a Potential Imminent and Substantial Danger                             | As required  | Within 12 hours of the permittee learns of the event      |

| Required Report              | Applicable Period | Due Date  |
|------------------------------|-------------------|---|
| Performance Testing Protocol | As required       | No less than 45 days, but no more than 90 days, before the anticipated test date <sup>1</sup> |
| Performance Testing          | As required       | Within 60 days of end of test <sup>1</sup>  |
| RATA Testing                 | As required       | Within 45 days of end of the test <sup>1</sup>  |

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

<sup>2</sup> Required only for stationary sources that emit 25 tons or more of nitrogen oxide (NO<sub>x</sub>) and/or emit 25 tons or more of volatile organic compounds (VOC) during a calendar year.

6. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit conditions, permit requirements, and requirements of applicable federal regulations. *[AQR 4.1 and AQR 12.5.2.6(d)]*

#### IV. MITIGATION

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

#### V. ACID RAIN REQUIREMENTS

1. The source is no longer considered a cogeneration facility and is no longer exempted from the Acid Rain Program. *[40 CFR 72.6(b)(4)(ii)]*
2. The permittee shall submit a complete Acid Rain permit application by March 1, 2026. *[40 CFR 72.30(b)(2)(v)]*

#### VI. STREAMLINING

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

**Table VI-1: Streamlined Standards**

| EU                                   | Regulation (40 CFR) | Regulatory Standard  | Permit Limit                                  | Value Comparison (in Units of the Permit Limit) |                    |  | Averaging Period Comparison |                               |  |
|--------------------------------------|---------------------|--|---|---|--------------------|--|-----------------------------|-------------------------------|--|
|                                      |                     |  |   | Standard Value                                  | Permit Limit Value | Is Permit Limit Equal or More Stringent? | Standard Averaging Period   | Permit Limit Averaging Period | Is Permit Limit Equal or More Stringent? |
| A001, - A003 & A001a- A003a (NO SCR) | 60.332 (GG)         | 84.1 ppmvd NO <sub>x</sub> @ 15% O <sub>2</sub> <sup>a</sup> | 25 ppmvd NO <sub>x</sub> @ 15% O <sub>2</sub> | 84.1  | 25                 | Yes                                      | 1 hour                      | 3 hours                       | Yes                                      |
| A001, - A003 & A001a- A003a (SCR)    | 60.332 (GG)         | 84.1 ppmvd NO <sub>x</sub> @ 15% O <sub>2</sub> <sup>a</sup> | 12 ppmvd NO <sub>x</sub> @ 15% O <sub>2</sub> | 84.1  | 12                 | Yes                                      | 1 hour                      | 3 hours                       | Yes                                      |

| EU                          | Regulation (40 CFR) | Regulatory Standard                 | Permit Limit                        | Value Comparison (in Units of the Permit Limit) |                    |  | Averaging Period Comparison |                               |  |
|-----------------------------|---------------------|-------------------------------------|-------------------------------------|---|--------------------|--|-----------------------------|-------------------------------|--|
|                             |                     |                                     |                                     | Standard Value                                  | Permit Limit Value | Is Permit Limit Equal or More Stringent? | Standard Averaging Period   | Permit Limit Averaging Period | Is Permit Limit Equal or More Stringent? |
| A001, - A003 & A001a- A003a | 60.332 (GG)         | 20%Opacity                          | 20% Opacity <sup>b</sup>            | 20  | 20                 | Yes                                      | 1 hour                      | 1 hour                        | Yes                                      |
| A001, - A003 & A001a- A003a | 60.332 (GG)         | Fuel sulfur content of < 8,000 ppmw | Fuel sulfur content of < 8,000 ppmw | 8,000   | 8,000              | Yes                                      | NA                          | NA                            | Yes                                      |

(a) Based on nominal heat input and electrical output (§60.332(1)).

(b) Less than 20% opacity except for a period of 6 consecutive minutes in any 60-minute period.

## VII. OTHER REQUIREMENTS

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