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PART 70 OPERATING PERMIT TECHNICAL SUPPORT DOCUMENT (STATEMENT of BASIS)

**APPLICATION FOR:
Part 70 Operation Administrative Revision**

SUBMITTED BY:
PanWest NCA2 Holdings LLC

FOR:
PanWest NCA2 Holdings LLC
Source: 00391

LOCATION:
8000 East Lake Mead Boulevard,
Las Vegas, Nevada 89156

SIC code 4931, "Electric and Other Services Combined"
NAICS code 221112, "Fossil Fuel Electric Power Generation"

Application Received: December 03, 2025

TSD Date: January 14, 2026

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 (NSR) purposes the source is a major stationary source for NO_x and CO and is minor source of PM₁₀, PM_{2.5}, SO₂ and VOC pollutants. The source meets and exceeds the Title V thresholds and is subject to its requirements, as outlined in section III-A below. The source is also an emitter of greenhouse gasses. The Black Mountains Area is classified as attainment with the National Ambient Air Quality Standards (NAAQS) for all criteria air pollutants. The potential electrical generating capacity exceeds 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 generating units. Each turbine combination is equipped with a 77 MMBtu/hr supplemental duct burner. A nominal 29.74 MW steam turbine generator is operated to produce electrical power. Other emission units at the facility include a diesel-powered emergency generator, a diesel-powered emergency fire pump, a diesel-powered water pump, and a two-cell cooling tower. This Part 70 Operating Permit (OP) is issued based on the renewal application submitted on July 15, 2020.

The following table summarizes the source PTE for each regulated air pollutant for all emission units addressed by this OP:

Table 1: Emission Units PTE Summary (TPY)

Pollutant	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs ¹	GHG ²
Source PTE	67.41	61.03	170.99	142.39	9.10	26.79	6.04	505,548
Major Stationary Source Thresholds (Categorical)	100	100	100	100	100	100	10/25 ¹	-

¹Ten tons for any individual HAP or 25 tons for the combination of all HAPs.

²Metric tons per year of CO₂e.

DAQ will continue to require the sources to estimate their GHG potential to emit in terms of each individual pollutant (CO₂, CH₄, N₂O, SF₆ etc). The TSD includes these PTEs for informational purposes.

DAQ has received delegated authority from the U.S. Environmental Protection Agency to implement the requirements of the Part 70 OP.

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I. ACRONYMS

Table I-1: List of Acronyms

Acronym	Term
AQR	Clark County Air Quality Regulation
CFR	Code of Federal Regulations
CO	carbon monoxide
CO ₂	carbon dioxide
CO _{2e}	carbon dioxide equivalent
DAQ	Division of Air Quality
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gas
HA	Hydrographic Area
HAP	hazardous air pollutant
NAICS	North American industry Classification System
NO _x	nitrogen oxide(s)
OP	operating permit
PM _{2.5}	particulate matter less than 2.5 microns in aerodynamic diameter
PM ₁₀	particulate matter less than 10 microns in aerodynamic diameter
PTE	potential to emit
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
VOC	volatile organic compound

II. CURRENT PERMITTING ACTION

This is an administrative revision of the Part 70 OP. The source no longer qualifies for exemption from the Acid Rain Program as NCA2 no longer supplies steam to Pabco. The permittee submitted an application to revise the following conditions in their Part 70 Operating Permit related to the Acid Rain Program.

The permittee also requested to correct the typographical error in Permit Condition III.C.2.d. This error was first found in the renewal Part 70 Operating Permit issued on March 14, 2016. In the TSD for that action, the correct startup limit of 450 hours per calendar month is listed, with no mention that the limit should be changed. In addition, a limit of 450 hours per calendar month corresponds to the 300 startup events per month.

1. Permit Condition III.C.2.b.

Request: Revise permit language to reflect Acid Rain program applicability beginning January 1, 2026. Beginning in September 2023, NCA2 ceased providing steam heat to the neighboring Pabco facility thus no longer qualifying for the Acid Rain Permit exemption.

~~The permittee shall, for each unit, supply equal to or less than one-third its potential electrical output capacity or equal to or less than 219,000 MWe hr actual electric output on an annual basis to any utility power distribution system for sale (on a gross basis). However, if in any 3 calendar year period, such unit sells to a utility power distribution system an annual average of more than one-third of its potential electrical output capacity and more than 219,000 MWe hr actual electric output (on a gross basis), that unit shall be an affected unit, Beginning January 1, 2026, NCA 2 is subject to the requirements of the Acid Rain Program. [NSR ATC/OP 391, Modification 7, Revision 1(10/17/07) and AQR 12.5.2.6(a) Application for a Part 70 Administrative Revision (12/3/2025)]~~

2. Permit Condition III.C.2.d.

Request: Correct typographical error.

With the permit issued March 14, 2016, "450 hours per calendar month" was replaced with "450 hours per calendar year". Based on file review including the Technical Supporting Document (TSD) for that action, this appears to be a typographical error that went unnoticed until recently with the change to the operating schedule from baseload operation.

The corrected condition is as follows:

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 ~~year~~ month for the facility. ~~[NSR ATC, Modification 5, Condition E-10 (3/9/1999), and NSR ATC/OP 391, Modification 7, Revision 1(10/17/07)]~~

3. Permit Condition III.D.8.

Request: Revise permit language to reference updated CEMS QAQC Plan and Part 75 applicability.

The permittee shall follow a written quality control program plan for the CEMS dated ~~August 2008 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) ~~do not apply to this source~~ ~~will apply to this source beginning January 1, 2026, with participation in the Part 75 program. [NSR ATC, Modification 5, Condition H-4 (3/9/199) and AQR 12.5.2.6(d) Application for a Part 70 Administrative Revision (12/3/2025)]~~

4. Permit Condition V.

Request: Revise permit language to reflect participation in the Acid Rain Program beginning January 1, 2026.

The source is ~~no longer considered a cogeneration facility and is no longer exempted based on the applicability criteria defined in Part 72.6(b)(4)(ii) from the Acid Rain Program.~~ *[40 CFR 72.6(b)(4)(ii)]*

In accordance with 40 CFR 72.30(b)(2)(v), the permittee is required to submit a complete Acid Rain permit application by March 1st of the year following the three calendar year period the source first became applicable to the Acid Rain Program. Since the permittee ceased providing steam to the neighboring Pabco in September 2023, the applicability date is March 1, 2026. This requirement has been added to the permit.