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PART 70 OPERATING PERMIT

SOURCE ID: 00533

Harry Allen Generating Station 14601 North Las Vegas Boulevard North Las Vegas, Nevada 89124

ISSUED ON: November 13, 2025 EXPIRES ON: November 12, 2030

Current action: Renewal

Issued to:

Nevada Power Company

6226 West Sahara Avenue

Las Vegas, Nevada 89146

Responsible Official:

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NATURE OF BUSINESS:

SIC code 4911: Electric Services

NAICS code 212112: 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

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EXECUTIVE SUMMARY

Harry Allen Generating Station is an electrical power generating station that falls under SIC Code 4911, "Electrical Services" and NAICS Code 212112, "Fossil-Fueled Electric power Generation." The facility is located in Hydrographic Area 216 (Garnet Valley), which is designated as attainment for all regulated pollutants. The source is classified as a categorical source in accordance with AQR 12.2.2(j)(1): "Fossil-fueled steam electric plants of more than 250 MMBtu/hr heat input."

Harry Allen Generating Station consists of combustion turbines (both simple cycle and combined cycle), HRSG duct burners, diesel-powered emergency generators and a diesel-powered fire pump. Also located on-site are a wet surface air cooler and an aboveground ammonia storage tank which are classified as insignificant activities. The source is a major stationary source for PM₁₀, PM_{2.5}, NO_x, and CO pollutants and a minor source for SO₂, VOC, and HAP. It is also a source of GHG pollutants. The source is subject to the requirements of 40 CFR Part 60, Subparts GG, IIII, KKKK, and TTTT, 40 CFR Part 63, Subpart ZZZZ, 40 CFR Part 72, and 40 CFR Part 75. By complying with the requirements of 40 CFR Part 60, Subpart IIII, the diesel-powered fire pump will also meet 40 CFR Part 63, Subpart ZZZZ requirements.

A renewal of the Part 70 operating permit was issued to Harry Allen Generating Station by The Clark County Department of Environment and Sustainability, Division of Air Quality on October 29, 2020. The permittee submitted subsequent Title V applications for a significant revision on January 12, 2022 and July 6, 2022. This permitting action is based on each of the aforementioned revisions and the renewal application submitted on April 3, 2025.

DAQ will continue to require the permittee to estimate GHG emissions in terms of each individual pollutant (CO₂, CH₄, N₂O, SF₆ etc.) during subsequent permitting actions will include these PTEs for informational purposes.

Pursuant to AQR 12.5.2, all terms and conditions in Sections 1 through 11 of this operating permit are federally enforceable unless explicitly denoted otherwise.

Table 1 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 (tons per year)

Description	PM ₁₀	PM _{2.5}	NO _x	со	SO ₂	voc	HAPs	GHG ¹
Part 70 OP PTE	150.75	150.75	304.62	277.82	14.10	64.85	6.51	2,398,807.27
Major Source Thresholds (Title V)	100	100	100	100	100	100	10/25 ²	-
Major Stationary Source Thresholds (PSD) (Categorical)	100	100	100	100	100	100	10/25 ²	-

¹Expressed in units of CO₂e

²10 tons for any individual hazardous air pollutant, or 25 tons for the combination of all hazardous air pollutants.

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Common Acronyms and Abbreviations

(These terms may be seen in the permit)

Acronym Term

AQR Clark County Air Quality Regulation

ATC Authority to Construct

CFR Code of Federal Regulations

CH₄ methane

CO carbon monoxide CO₂ carbon dioxide

CO₂e carbon dioxide equivalent CTUP combustion turbine upgrade

DAQ Division of Air Quality

DES Clark County Department of Environment and Sustainability

DLN Dry low NOx

DOM date of manufacture

EU emission unit
GHG greenhouse gas
H₂S hydrogen sulfide
HAP hazardous air pollutant

HOO Hearing Officer Order

hp horsepower

HRSG heat recovery steam generator

kW kilowatts

MMBtu/hr Millions of British Thermal Units per Hour

 $\begin{array}{ll} \text{MW} & \text{megawatt} \\ \text{N}_2 \text{O} & \text{nitrous oxide} \end{array}$

NAICS North American Industry Classification System

NESHAP National Emission Standards for Hazardous Air Pollutants

NO_X nitrogen oxides

NRS Nevada Revised Statutes

NSPS New Source Performance Standard

NSR New Source Review OP operating permit

PM_{2.5} particulate matter less than 2.5 microns in diameter PM₁₀ particulate matter less than 10 microns in diameter

Pb lead

PSD Prevention of Significant Deterioration

PTE potential to emit

RATA relative accuracy test audits SCR selective catalyst reduction

SF₆ sulfur hexafluoride

SIC Standard Industrial Classification

SO₂ sulfur dioxide ULN Ultra low NOx

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 Number	Serial Number
A01	CTG Natural Gas Turbine (Turbine Unit 5)	Nominal 206 MW	General Electric	PG7241FA	298914
A02	CTG Natural Gas Turbine (Turbine Unit 6)	Nominal 206 MW	General Electric	PG7241FA	298915
A03	Duct Burner HRSG associated with A01	173 MMBtu/hr (LHV)			
A04	Duct Burner HRSG associated with A02	173 MMBtu/hr (LHV)			
	Emergency Generator	275 kW	Katolight	N-37881	AD129178SLM
A07 ¹	Diesel Engine; DOM: Pre 2001	405 hp	Perkins	8D26971U80033 T	1
	Emergency Generator	350 kW		SR4B	8ER03545
A08 ²	Diesel Engine; DOM: 2002	519 hp	Caterpillar	3406	4ZR08055
A09	Natural Gas Only Turbine (Turbine Unit 4)	75 MW	General Electric	MS7001EA (PG7121)	298532
53301	Natural Gas Only Turbine (Turbine Unit 3)	79.2 MW	General Electric	MS7001EA	296449
Λ11	Fire Pump		Xylem	8X6X12F-M	24-101903-01- 01/QLG214
A11	Diesel Engine; DOM: 05/2009	175 hp	Clarke/John Deere	6068TF252	PE6068T75199 8

¹Located at Hary Allen Substation.

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

Description	Rating
Aboveground Storage Tank; Ammonia	19,500 Gallons
Wet Surface Cooler	2,800 gpm

²Located at Harry Allen switchyard.

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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; 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.

2.0 CONTROLS

2.1 CONTROL DEVICES

1. The permittee shall operate the controls as indicated in Table 2-1 at all times any affected emission unit is operating unless otherwise noted. [NSR ATC Modification: April 16, 2009 and AQR 12.5.2.6(a)]

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

CD	Affected EU	Device Type	Manufacturer	Model No.	Pollutant
D01	A01/A03 and A02/A04	SCR			NOx
D04	A01/A03 and A02/A04	Oxidation Catalyst			CO
D05	A09	Oxidation Catalyst			CO, VOC

- 2. The permittee shall maintain and operate each SCR system on Turbine Units 5 and 6 (EUs: A01 and A02) and their associated duct burners (EUs: A03 and A04) in accordance with manufacturer's specifications. [NSR ATC Modification 6, Revision 3, Condition IV-B-3(e) (04/16/09)]
- 3. The permittee shall operate the SCR at all times the associated turbine unit is operating, excluding periods of startup, shutdown, and testing/tuning. [NSR ATC Modification 6, Revision 3, Condition IV-B-3(e) (04/16/09) and Title V OP (10/29/2020)]
- 4. The permittee shall control NO_x exhaust emissions from Turbine Unit 3 with the use of the General Electric DLN combustor, in accordance with manufacturer's specifications and good combustion practices (EU: 53301). [NSR ATC Modification 6, Revision 3, Condition IV-B-3(b) (04/16/09)]
- 5. The permittee shall control NO_x exhaust emissions from Turbine Unit 4 with the use of a ULN combustor, in accordance with manufacturer's specifications and good combustion practices (EU: A09). [NSR ATC Modification 6, Revision 3, Condition IV-B-3(c) (04/16/09)]
- 6. The permittee shall maintain and operate an oxidation catalyst downstream of associated duct burners for the control of CO on Turbine Units 5 and 6 (EUs: A01 and A02) and their associated duct burners (EUs: A03 and A04) in accordance with manufacturer's specifications. The catalysts shall be operated at all times the associated turbine unit is operating, excluding periods of startup, shutdown, and testing/tuning. [NSR ATC Modification 6, Revision 3, Condition IV-B-3(g) (04/16/09) and Title V OP (02/23/2023)]
- 7. The permittee shall maintain and operate an oxidation catalyst downstream of any associated duct burners for the control of CO and VOCs on Turbine Unit 4 in accordance with manufacturer's specifications. The catalysts shall be operated at all times the associated turbine unit is operating, excluding periods of startup, shutdown, and testing/tuning (EU: A09). [NSR ATC Modification 6, Revision 3, Condition IV-B-3(g) (04/16/09) and Title V OP (02/23/2023)]

2.2 CONTROL REQUIREMENTS

- 1. The permittee shall, at all times, including periods of startup, shutdown, malfunction, and testing/tuning, maintain and operate the source in a manner consistent with good air pollution control practice for minimizing emissions as required by 40 CFR 60.11. Determination of whether acceptable operating and maintenance procedures are being used shall be based on information available to the Control Officer which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [NSR ATC Modification 6, Revision 3, Condition IV-B-3(a) (04/16/09), and AQR 12.5.2.6(a)]
- 2. The permittee shall operate each SCR system such that NO_x emissions do not exceed the limitations listed in Tables 3-4 and 3-5 for Turbine Units 5 and 6 (EUs: A01 and A02) and their associated duct burners (EUs: A03 and A04) excluding startups, shutdowns, and testing/tuning. [NSR ATC Modification 6, Revision 3, Condition IV-B-3(f) (04/16/09) and Title V OP (02/23/2023)]
- 3. The permittee shall operate each oxidation catalyst such that CO emissions do not exceed limits listed in Tables 3-4 and 3-5 Turbine Units 5 and 6 (EUs: A01 and A02) and their associated duct burners (EUs: A03 and A04). [NSR ATC Modification 6, Revision 3, Condition IV-B-3(h) (04/16/09)]
- 4. The permittee shall operate the oxidation catalyst such that CO and VOC emissions do not exceed limits listed in Table 3-4 for Turbine Unit 4 (EU: A09). [NSR ATC Modification 6, Revision 3, Condition IV-B-3(h) (04/16/09)]
- 5. The permittee shall control SO₂ exhaust emissions from any turbine or duct burner by the exclusive use of pipeline quality natural gas and good combustion practices. [NSR ATC Modification 6, Revision 3, Condition IV-B-3(i) (04/16/09)]
- 6. The permittee shall control PM₁₀ exhaust emissions from each turbine unit (EUs: A01, A02, A09, and 53301) and their associated duct burners (EUs: A03 and A04) by properly maintaining and periodically replacing inlet air filters preceding each turbine per manufacturer's specifications and good operating practices. [NSR ATC Modification 6, Revision 3, Condition IV-B-3(j) (04/16/09)]

Emergency Generators and Fire Pump

- 7. The permittee shall only combust 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 each emergency generator (EUs: A07 and A08) and fire pump (EU: A11). [40 CFR 60.4207(b) and 40 CFR 63.6604(b)]
- 8. The permittee shall maintain each emergency diesel-powered emergency generator as follows, unless the manufacturer's specifications are more stringent (EUs: A07 and A08): [40 CFR 63.6640]
 - a. Change oil and filter every 500 hours of operation or annually, whichever comes first;
 - b. Inspect air cleaners every 1,000 hours of operation or annually, whichever comes first; and

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c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Other

- 9. 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. [AQR 40; and AQR 43]
- 10. The permittee shall comply with the control requirements contained in this section. If there is inconsistency between standards or requirements, the most stringent standard or requirement shall apply. [AQR 12.5.2.6(a)]

3.0 LIMITATIONS AND STANDARDS

3.1 OPERATIONAL LIMITS

Turbines

1. The permittee shall limit operation of each stationary gas turbine (EUs: A01 and A02) and duct burner (EUs: A03 and A04) to the fuel limits listed in Table 3-1 [AQR 12.4 ATC (11/14/2022) and AQR 12.5.2.6(b)]

Table 3-1: Fuel Limitations for Turbines and Duct Burners

EU	Fuel Type	Maximum Annual MMBtu per Any Consecutive 12- Month Period	Reference
A01, A02	Natural Gas	14,751,840 MMBtu ¹ (per unit)	Based on LHV of natural gas
A03, A04	Natural Gas	692,000 MMBtu ² (per unit)	Based on LHV of natural gas

The annual heat input limit is established based on the average hourly heat input of 1,684 MMBtu/hr at an average annual temperature of 67°F and 8,760 hours per year.

2. The permittee shall limit the operation of Turbine Units 3 and 4 (EUs: 53301 and A09) to the fuel limits listed in Table 3-2: [NSR ATC Modification 6, Revision 3, Condition IV-B-2(a) (04/16/09) and AQR 12.5.2.6(b)]

Table 3-2: Fuel Limitations for Turbine Units

EU	Fuel Type	Maximum Hourly MMBtu	Reference
53301	Natural Gas	873.1 MMBtu	Based on LHV of natural gas
A09	Natural Gas	1,060 MMBtu	Based on HHV of natural gas

- 3. The permittee shall limit operation of Turbine Unit 3 to 6,135 hours during any consecutive 12-month period (EU: 53301). [NSR ATC Modification 6, Revision 3, Condition IV-B-2(c) (04/16/09), Title V OP (02/23/2023) and AQR 12.5.2.6(b)]
- 4. The permittee shall limit operation of Turbine Unit 4 to 3,300 hours during any consecutive 12-month period (EU: A09). [NSR ATC Modification 6, Revision 3, Condition IV-B-2(d) (04/16/09) and AQR 12.5.2.6(b)]
- 5. For Turbine Unit 3, startup shall be defined as the period beginning with ignition and lasting for a duration not to exceed 60 minutes (EU: 53301). [NSR ATC Modification 6, Revision 3, Condition IV-B-2(f) (04/16/09)]
- 6. For Turbine Unit 3, shutdown means the period immediately preceding the cessation of firing of a turbine not to exceed 60 consecutive minutes (EU: 53301). [NSR ATC Modification 6, Revision 3, Condition IV-B-2(f) (04/16/09)]

²The annual heat input limit is established based on the average hourly heat input of 173 MMBtu/hr and 4,000 hours per year.

- 7. For Turbine Unit 4, startup shall be defined as the period beginning with ignition and lasting for a duration not to exceed 180 minutes (EU: A09). [NSR ATC Modification 6, Revision 3, Condition IV-B-2(g) (04/16/09)]
- 8. For Turbine Units 5 and 6, startup shall be defined as the period beginning with ignition and lasting for a duration not to exceed 180 minutes. A cold startup may extend beyond 180 minutes but shall not exceed 300 minutes (EUs: A01 and A02). [NSR ATC Modification 6, Revision 3, Condition IV-B-2(g) (04/16/09)]
- 9. For Turbine Units 4, 5, and 6, shutdown means the period immediately preceding the cessation of firing of a turbine not to exceed 60 consecutive minutes (EUs: A09, A01, and A02). [NSR ATC Modification 6, Revision 3, Condition IV-B-2(g) (04/16/09)]
- 10. Testing/tuning is defined as a planned operation outside of normal emission limitations for the purposes of data collection, diagnostics, or operational adjustment. [Operating Permit Renewal (10/29/2020)]
- 11. The permittee shall limit all testing/tuning to a cumulative total of 600 minutes per calendar year per turbine (EUs: A01, A02, A09 and 53301) and their associated duct burners (EUs: A03 and A04). [Operating Permit Renewal (10/29/2020) and AQR 12.5.2.6(b)]

Emergency Generators and Fire Pump

- 12. The permittee shall limit the operation of each emergency generator for testing and maintenance purposes to 100 hours/year. The permittee may operate each 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 (12.a–e inclusive), the emergency generators 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 (EUs: A07 and A08): [40 CFR Part 63.6640]
 - 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.

13. The permittee shall limit the operation of the emergency fire pump (EU: A11) for testing and maintenance purposes to 100 hours per year. The permittee may operate the fire pump up to 50 hours per year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. [40 CFR Part 60, Subpart IIII (60.4211(f))]

3.2 EMISSION LIMITS

1. The permittee shall not allow actual and allowable emissions from the individual emission units to exceed the calculated PTE listed in Table 3-3 on a consecutive 12-month total, except for emission units intended for use in emergencies. Tons-per-year emission limits of each turbine unit include startup, shutdown, and testing/tuning emissions. [NSR ATC Modification 6, Revision 3, (04/16/09) and NSR ATC Modification 7 (04/27/09), AQR 12.4 ATC (11/14/2022) and AOR 12.5.2.6(b)]

Table 3-3: Emission Unit PTE, Including Startups, Shutdowns, and Testing/Tunings (tons per year)

EU	Condition ¹	PM ₁₀	PM _{2.5}	NO _x	СО	SO ₂	voc	HAP
A01	8,760 hr/yr	50.20	50.20	85.90	44.68	4.40	28.10	2.41
A02	8,760 hr/yr	50.20	50.20	85.90	44.68	4.40	28.10	2.41
A03	4,000 hr/yr		Included with A01				0.11	
A04	4,000 hr/yr		Included with A02				0.11	
A07	500 hr/yr	0.22	0.22	3.10	0.67	0.01	0.25	0.01
A08	500 hr/yr	0.33	0.33	1.90	1.19	0.01	0.02	0.01
A09	3,300 hr/yr	19.17	19.17	39.08	33.99	1.26	3.47	0.57
53301	6,135 hr/yr	30.60	30.60	88.60	152.50	4.01	4.60	0.87
A11	500 hr/yr	0.03	0.03	0.40	0.11	0.01	0.03	0.01

¹The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit.

2. The permittee shall not allow the actual and allowable emissions from each emission unit to exceed the emission rates listed in Table 3-4. Pounds-per-hour limits are normal operation (exclude startup, shutdown, and testing/tuning) limits only. The hourly emission limits for NO_x and CO shall not be exceeded for any 1-hour rolling averaging period as determined by the CEMS as described in Section 4. [NSR ATC Modification 6, Revision 3, (04/16/09) and NSR ATC Modification 7 (04/27/09), AQR 12.4 ATC (11/14/2022) and AQR 12.5.2.6(b)]

Table 3-4: Emission Rate Limitations, Excluding Startup, Shutdowns, and Testing/Tuning (pounds per hour)

	-				
EU	PM ₁₀	PM _{2.5}	NO _X	со	voc
A01/A03	11.50	11.50	15.40	9.50	6.40
A02/A04	11.50	11.50	15.40	9.50	6.40
A09	9.98	9.98	19.50	8.90	1.80
53301	10.00	10.00	28.80	49.70	1.50

3. The permittee shall not allow the actual and allowable emissions from each turbine (EUs: A01 and A02) and their associated duct burners (EUs: A03 and A04) to exceed the emission rates listed in Table 3-5. These short-term emission limits are based on a 3-hour averaging

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period and represent normal operation (exclude startup, shutdown, and testing/tuning) limits only. [NSR ATC Modification 6, Revision 3, (04/16/09) and AQR 12.5.2.6(b)]

Table 3-5: Emission Concentration Limitations, Excluding Startup, Shutdown and Testing/Tuning

EU	Mode	NO _X @ 15% O ₂	CO @ 15% O ₂	VOC @ 15% O ₂
A01 A04	With Duct Firing	2.0 ppmvd	2.0 ppmvd	2.9 ppmvd
A01 – A04	Without Duct Firing	2.0 ppmvd	2.0 ppmvd	2.2 ppmvd

- 4. The permittee shall not allow the sulfur content of the natural gas fuel to exceed an average concentration of 0.5 grains per 100 scf in the turbines (EUs: A09 and 53301). [NSR ATC Modification 6, Revision 3, Condition IV-B-3(i) (04/16/09)]
- 5. The permittee shall limit the combined SO₂ emissions from the combustion turbines (EUs: A01 and A02) and their associated duct burners (EUs: A03 and A04) to 0.060 lb per MMBtu of heat input. [AQR 12.4 ATC (11/14/2022) and 40 CFR 60.4330(a)(2)]
- 6. The permittee shall not allow the actual and allowable emissions from each turbine to exceed the emissions rates listed in Table 3-6. The short-term emission limits are based on the averaging period as listed, with the table, and represent normal operation (exclude start, shutdown, and testing/tuning) limits only (EUs: 53301 and A09). [NSR ATC Modification 6, Revision 3, Conditions IV-B-1(a) and (b) (04/16/09) and AQR 12.5.2.6(b)]

Table 3-6: Emission Concentration Limitations, Excluding Startup, Shutdown, and Testing/Tuning

EU	NO _X @ 15% O ₂	
53301 ¹	9.0 ppmvd	
A09 ²	5.0 ppmvd	

¹Limits based on a 3-hour averaging period.

7. The permittee shall not allow the actual emissions from each turbine (A09 and 53301) to exceed any time the applicable Subpart GG standards for NO_X, as defined in Table 3-7. [40 CFR 60.332]

Table 3-7: Applicable Subpart GG Standards, 4-hour Rolling Average

EU	NO _x STD in ppmvd @ 15% O ₂
53301	96
A09	95

8. The permittee shall not allow the actual emissions from each turbine (EUs: A01 and A02) or their associated duct burners (EUs: A03 and A04) at any time to exceed the applicable Subpart KKKK standards for NO_X, as defined in Table 3-8. [40 CFR 60.4320 and Table 1 of Subpart KKKK]

²Limits based on a 1-hour averaging period.

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Table 3-8: Applicable NOx Concentration Standards for Subpart KKKK (ppmvd)

	NO _x (ppmvd @ 15% O2), 30-Day Rolling Average				
EU	Turbine Loads Greater than or equal to 75% of Peak Load Less Than 75% of Peak Load				
A01 – A04	15	96			

9. The permittee shall not allow actual emissions from the modified turbines to exceed the emission rates in Table 3-9 during periods of testing/tuning. [Title V OP (02/23/2023)]

Table 3-9 Emission Rate Limitations for CO during Testing/Tuning (pounds per hour)

EU	со
A01 – A04	400
A09	100
53301	200

Other

- 10. The permittee shall not discharge any gasses that contain CO₂ in excess of the applicable emission standard specified in Table 1 of 40 CFR Part 60, Subpart TTTT (EUs: A01 A04). [40 CFR 60.5520(a)]
- 11. 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]

4.0 COMPLIANCE DEMONSTRATION REQUIREMENTS

4.1 MONITORING

Visible Emissions [AQR 12.5.2.6(d) & AQR 12.5.2.8]

- 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 plant-wide visual emissions check at a minimum of once each quarter.
- 3. The permittee shall conduct a visual emissions check at least quarterly on each diesel-fired emergency generator (EUs: A07 and A08) and fire pump (EU: A11) while in operation.
- 4. If no plume appears to exceed visible emissions standards during the visible emissions check, the date, location, and results shall be recorded, along with the viewer's name.
- 5. If a plume appears to exceed the visible emissions standards (other than opacity standards) the permittee shall 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
- 6. If a plume appears to exceed an 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 if the plume observed is perceived to be exceeding an opacity standard.
 - 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 standard 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 a visible emissions 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.
- 7. Any scenario of visible emissions noncompliance can and may lead to enforcement action.

CEMS [AQR 12.5.2.6(d) & AQR 12.5.2.8]

- 8. The permittee shall comply with all applicable monitoring requirements of 40 CFR Part 60, Subpart KKKK and 40 CFR Part 75 for the combustion turbines (EUs: A01 and A02) and associated duct burners (EUs: A03 and A04). [AQR 12.4 ATC (11/14/2022) and 40 CFR Part 60.4345]
- 9. The permittee shall comply with all applicable monitoring requirements of 40 CFR Part 60, Subpart GG and 40 CFR Part 75 for the combustion turbines (EUs: 53301 and A09). [40 CFR Part 60.334]
- 10. To demonstrate continuous direct compliance with all emission limitations for NO_x and CO specified in Section 3.2 of this permit, the permittee shall install, calibrate, maintain, operate, and certify CEMS for NO_x, CO, and either O₂ or CO₂ on each turbine unit and associated duct burners in accordance with 40 CFR Part 75 and 40 CFR Part 60, as applicable. Each CEMS shall include an automated data acquisition and handling system. Each system shall monitor and record at least the following data: [40 CFR 75.53, Subpart F]
 - a. Exhaust gas concentrations (in ppm) of NO_X, CO, and either diluent O₂ or CO₂ for all turbine units (EUs: A01 A04, 53301, and A09) at least once every 15 minutes when required by 40 CFR Part 60 or 40 CFR Part 75, as appropriate;
 - b. Exhaust gas flow rate (by direct or indirect methods);
 - c. Fuel flow rate;
 - d. Hours of operation;
 - e. 3-hour rolling average of NO_X concentrations (in ppm) for Turbine Unit 3 (EU: 53301);
 - f. 1-hour rolling average CO concentrations (in ppm) for Turbine Unit 3 (EU: 53301);
 - g. 1-hour rolling averages of each NO_X and CO concentrations (in ppm) for Turbine Unit 4 (EU: A09);
 - h. 3-hour rolling averages of each NO_X and CO concentrations (in ppm) for Turbine Units 5 and 6 (EUs: A01 and A02) and their associated duct burners (EUs: A03 and A04);

- i. Hourly and consecutive 12-month period accumulated mass emissions (in pounds) of NO_X and CO (EUs: A01 A04, 53310, and A09); and
- j. Hours of downtime of the CEMS.
- 11. All emissions recorded by the CEMS shall be reported in clock hour increments. Any clock hour that contains at least one minute of a startup event shall be considered a startup hour and any clock hour that contains at least one minute of a shutdown event shall be considered a shutdown hour. [AQR 12.5.2.6(d)]
- 12. Any clock hour that contains any part of a testing/tuning event shall not be subject to the limits in Tables 3-4, 3-5, and 3-6. [AQR 12.5.2.6(d)]
- 13. The permittee shall maintain and adhere to the latest quality assurance plan, submitted to and approved by DAQ that includes auditing schedules, reporting schedules, design specifications, and other quality assurance requirements for each CEMS. [40 CFR Part 75]
- 14. The permittee shall conduct periodic audit procedures and QA/QC procedures for CEMS conforming to the provisions of 40 CFR 60 Appendix F or 40 CFR 75 Appendix B, as applicable. [AQR 12.5.2.6(d)]
- 15. The permittee shall conduct RATA of the CO, NO_X, and diluent O₂ or CO₂ CEMS at least annually or the frequency specified in 40 CFR 60 Part 60 and 75, as applicable. [AQR 12.5.2.6(d)]
- 16. The permittee shall take corrective actions as described in Appendix B of 40 CFR 75 if an out-of-control period to a monitor or CEMS occurs. [40 CFR 75.24]
- 17. The permittee shall monitor monthly occurrences and duration of startup/shutdown cycles for each turbine unit (EUs: A01 A04, 53301, and A09). [AQR 12.5.2.6(d)]
- 18. The permittee shall monitor the duration of testing/tuning events for each turbine unit (EUs: A01 A04, 53301, and A09). [AQR 12.5.2.6(d) and Title V OP (02/23/2023)]

NSPS GG and KKKK Fuel Sulfur Content

- 19. The permittee shall verify compliance with fuel gas sulfur content in accordance with 40 CFR 60.334(h) except as provided in paragraph (h)(3) (EUs: 53301 and A09). [AQR 12.5.2.6(d) and 40 CFR 60.334(h)]
- 20. The permittee shall monitor the total sulfur content of the fuel being fired in each turbine, except as provided in 40 CFR Part 60.4365, using the total sulfur methods described in 40 CFR Part 60.4415 (EUs: A01 A04). [AQR 12.4 ATC (11/14/2022) and 40 CFR Part 60.4360]
- 21. The permittee may elect not to monitor the total sulfur content of the fuel combusted in the modified combustion turbines (EUs: A01 and A02) and associated duct burners (EUs: A03 and A04), as required by NSPS KKKK, if the fuel is demonstrated not to exceed potential sulfur emissions of 0.060 lb SO₂/MMBtu heat input. The permittee shall use one of the following sources of information to make the required demonstration: [AQR 12.4 ATC (11/14/2022) and 40 CFR Part 60.4365]
 - a. The gas quality characteristics in a current, valid purchase contract, tariff sheet, or transportation contract for the fuel specifying that the maximum total sulfur content of

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- the fuel is 20 gr/100 scf or less, and documentation that potential sulfur emissions are less than 0.060 lb SO₂/MMBtu heat input; or
- b. Representative fuel sampling data showing that the sulfur content of the fuel does not exceed 0.060 lb SO₂/MMBtu heat input. At a minimum, the amount of fuel sampling data specified in 40 CFR Part 75, Appendix D, Sections 2.3.1.4 or 2.3.2.4 is required.

Emergency Generators and Fire Pump [AQR 12.5.2.6(d) & AQR 12.5.2.8]

- 22. The permittee shall monitor the sulfur content and cetane index or aromatic content of the fuel burned in each emergency generator (EUs: A07 and A08) and fire pump (EU: A11) by retaining a copy of vendor fuel specifications. [40 CFR 60.4207(b) and 40 CFR 63.6604(b)]
- 23. The permittee shall operate each diesel-powered emergency generator (EUs: A07 and A08) and diesel-powered fire pump (EU: A11) with a nonresettable hour meter and monitor the duration of operation for testing, maintenance and nonemergency operation, and separately for emergencies. The nature of the emergency leading to emergency operation shall be documented. [40 CFR 60, Part IIII and 40 CFR Part 63, Subpart ZZZZ]

Other

24. The permittee shall monitor the emissions (in tpy) of any regulated NSR pollutant that could increase as a result of the CTUP and that are emitted by any emissions unit affected by the change. The annual emissions from the affected emissions units shall be calculated in tons per year for a period of 10 years following resumption of regular operations after the change. [AQR 12.4 ATC (11/14/2022) and AQR 12.5.2.6(d)]

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 *Clark County Department of Air Quality Guideline for Source Testing* (9/19/2019). Performance

testing shall be the instrument for determining initial compliance with the emission limitations set forth in Tables 3-4, 3-5 and 3-6 of this permit and 40 CFR Part 60, Subpart GG. [AQR 12.5.2.8(a)]

- a. Initial performance tests for Turbine Unit 3 were conducted on June 5, 6, and 7, 1995.
- b. Initial performance tests for Turbine Unit 4 were conducted on April 24, 2006.
- c. Initial performance tests for Turbine Units 5 and 6, following startup after CTUP completion, were conducted from July 7 9, 2023.
- 6. 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 4.2 and 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, Subparts GG, IIII, KKKK, and TTTT; 40 CFR Part 63, Subpart ZZZZ, 40 CFR Part 72; 40 CFR Part 75, Subpart F, and any other applicable regulations. [AQR 12.4 ATC (11/14/2022)]
- 3. A quality assurance plan approved by the Control Officer shall contain auditing schedules and design specifications for the CEMS. The CEMS shall conform to all provisions of 40 CFR Part 60.13; 40 CFR Part 60, Subparts GG and KKKK; and 40 CFR Part 75, as applicable. [AQR 12.4 ATC (11/14/2022)]
- 4. The permittee shall include in each record, 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 12.4 ATC (11/14/2022)]
- 5. 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]
- 6. 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]
- 7. At a minimum, the permittee shall create and maintain the records identified in Sections 4.3.8 and 4.3.9, 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]
- 8. The permittee shall maintain the following records onsite that require semiannual reporting and include, at a minimum: [AQR 12.5.2.6(d) and AQR 12.5.2.8]
 - a. The magnitude and duration of excess emissions, notifications, monitoring system performance, malfunctions and corrective actions taken as required by 40 Part CFR 60.7;

- b. The number of occurrences and the duration of each testing/tuning event, as well as the reason for the testing/tuning;
- c. The records of the emissions (in tpy) of any regulated NSR pollutant that could increase as a result of the CTUP for a period of 10 years following resumption of regular operations after the change [AQR 12.4 ATC (11/14/2022)];

Turbines and Duct Burners

- d. Monthly, consecutive 12-month total heat input in MMBtu for each turbine (EUs: A01 and A02);
- e. Monthly, consecutive 12-month total heat input in MMBtu for each duct burner (EUs: A03 and A04);
- f. Monthly, consecutive 12-month total hours of operation for each turbine (EUs: A09 and 53301);
- g. Monthly CEMS NO_X and CO mass emissions and each consecutive 12-month total of NO_X and CO emissions including startup, shutdown, testing/tuning and normal operations in tons;
- h. Dates, times, and duration of each startup, shutdown cycle, and testing/tuning event;

CEMS

- i. CEMS audit results or accuracy checks, corrective actions, etc., as required by 40 CFR 60, Appendix F and the CEMS QA Plan;
- j. All CEMS information required by the CEMS Quality Assurance plan as specified in 40 CFR 75 Subpart F and Monitoring Section of this permit;
- k. Time, duration, nature and probable cause of any CEMS downtime and corrective actions taken:

Emergency Engines

- 1. Records of inspection and maintenance for each diesel-powered generator (EUs: A07 and A08) and the diesel-powered fire pump (EU: A11);
- m. Sulfur content and cetane index or aromatic content of diesel fuel used to power each diesel-powered emergency generator (EUs: A07 and A08) and diesel-powered fire pump (EU: A11), as certified by the supplier;
- n. Date and duration of operation of each diesel-powered emergency generator (EUs: A07 and A08) and the fire pump (EU: A11) for testing, maintenance, and nonemergency use;
- o. Date and duration of operation of each emergency generator (EUs: A07 and A08) and the fire pump (EU: A11) for emergency use, including documentation justifying the use during emergency;

Other

- p. Deviations from permit requirements resulting in excess emissions (report as required by Section 4.4); and
- q. Deviations from permit requirements not resulting in excess emissions (report semiannually).
- 9. The permittee shall maintain the following records on-site: [AQR 12.5.2.6(d) and AQR 12.5.2.8]

Turbines and Duct Burners

- a. Startup and shutdown short-term total emissions for each pollutant per stationary gas turbine for each cycle event and yearly emissions for each pollutant in tons per year (each 12-month cumulative total calculated on a monthly basis);
- b. Hourly heat input in MMBtu for each turbine (EUs: A09 and 53301);
- c. Dates and hours of operation with monthly totals for each turbine (EU: A09 and 53301);
- d. Documentation verifying sulfur content of natural gas;
- e. Manufacturer's O&M manual for SCR, DLN and ULN combustors, and Oxidation Catalyst controls;

CEMS

- f. All CEMS information required by the CEMS Quality Assurance Plan which shall contain auditing schedules, reporting schedules, and design specifications for the CEMS. The CEMS shall conform to applicable provisions of 40 CFR Part 60, Subpart GG and 40 CFR Part 75 (the QA Plan has been approved by the Control Officer) as specified in 40 CFR 75 Subpart F and Monitoring Section of this permit;
- g. Each CEMS "out-of-control" period, as defined in 40 CFR 75, Appendix B;
- h. CEMS audit results, RATA, corrective actions, etc., as required by 40 CFR 60 and the CEMS quality assurance plan;
- i. Certificates of representation for the designated representative and the alternative designated representative that meet all requirements of 40 CFR Part 72.24;

Nonroad Engines

j. Records of location changes for nonroad engines, if applicable.

Other

- k. Log of visible emissions checks on all emission units to include the stationary gas turbines, emergency generator and the fire pump;
- 1. Annual emissions (tons per year) of each generator and fire pump and the source;

- m. Annual copies of all reports, compliance certifications, other submissions and all records made or required under the Acid Rain Program;
- n. 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;
- o. Records of natural gas purchases or a current valid purchase contract or tariff sheet demonstrating compliance with the sulfur dioxide and carbon dioxide emission rate requirements of 40 CFR 60.4365(a) and 60.5520(d)(1); and
- p. Summary of results of all performance testing.

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 (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 (NO_X) 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 comply with all applicable notification and reporting requirements of 40 CFR Part 60.7, 40 CFR Part 60 Subpart Db, 40 CFR Part 60, Subpart GG, 40 CFR Part 60 Subpart IIII, 40 CFR Part 60 Subpart KKKK, 40 CFR Part 63 Subpart ZZZZ, 40 CFR Part 72.9(f), and 40 CFR Part 75. [AQR 12.5.2.6(d)]
- 13. The permittee shall submit semiannual monitoring reports to DAQ. [AQR 12.5.2.6(d) and AQR 12.5.2.8]
- 14. The following requirements apply to semiannual reports: [AQR 12.5.2.6(d) and AQR 12.5.2.8]
 - a. The report shall include each item listed in Section 4.3.8.
 - 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.
- 15. 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 year¹
Semiannual report for 2 nd six-month period; any additional annual records required	July, August, September, October, November, December	January 30 each year¹
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
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	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	As required	Within 45 days of end of test ¹

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

16. 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]

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.

5.0 MITIGATION

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

6.0 PERMIT SHIELD

Permit Shield

1. The source has requested a permit shield for applicable regulations in the following regulations (Table 6-1). [AQR 12.5.2.9]

Table 6-1: Applicable Requirements Related to Permit Shield

Citation	Title	Permit Condition#
AQR 14.1(b)(40), Subpart GG	NSPS – Stationary Gas Turbines	3.2.4

2. Compliance with the terms contained in this permit shall be deemed compliance with the applicable requirements (Table 6-2) in effect on the date of permit issuance. [AQR 12.5.2.9]

Table 6-2: Streamlined Requirements Related to Permit Shield (Natural Gas-Fired)

					Valu	ue Comp	arison	
EU	Regulation (40 CFR)	Pollutant	Reg. Std.	Permit Limit	Std Val in Units of Permit Limit	Permit Limit Value	Is Permit Limit Equal or More Stringent?	Streamlining Statement for Shielding Purposes
A09 & 53301	60.333 (GG)	SO ₂	0.8% sulfur by weight (8,000 ppmv)	0.5 grains sulfur per 100 scf	260¹	0.5	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.

¹Sulfur content was converted from percent by weight to grains (gr) per 100 standard cubic feet (scf) as follows: 0.8% sulfur = 56 gr per pound (lb) natural gas. Assuming an average molecular weight of 18 lb/lb-mol for natural gas = 2.14 * 10³ scf. Lastly. 56 gr sulfur per 2.14 * 10³ scf natural gas equates to 260 gr/100 scf.

7.0 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 Nevada Power Harry Allen Station, Apex Dry Lake Industrial Park, Clark County 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 Section 11. [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)]

8.0 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)]

9.0 ADMINISTRATIVE REQUIREMENTS

9.1 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)]

9.2 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)]

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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)]

10.0 ATTACHMENTS

10.1 APPLICABLE REGULATIONS

Requirements Specifically Identified as Applicable

- 1. NRS, Chapter 445B.
- 2. Applicable AQRs listed in Table 10-1.

Table 10-1: Applicable Clark County AQRs

Citation	Title
AQR 00	"Definitions"
AQR 02	"Procedures for the Adoption and Revision of Regulations and for the Inclusion of Those Regulations in the State Implementation Plan"
AQR 04	"Control Officer"
AQR 05	"Interference with Control Officer"
AQR 06	"Injunctive Relief"
AQR 08	"Persons Liable for Penalties – Punishment: Defense"
AQR 09	"Civil Penalties"
AQR 10	"Compliance Schedules"
AQR 11	"Ambient Air Quality Standards"
AQR 12.0	"Applicability and General Requirements"
AQR 12.4	"Authority to Construct Application and Permit Requirements for Part 70 Sources"
AQR 12.5	"Part 70 Operating Permit Requirements"
AQR 12.6	"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 13.2(b)(1)	"Subpart A - General Provisions"
AQR 13.2(b)(82)	"Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
AQR 14.1(b)(1)	"Subpart A – General Provisions"
AQR 14.1(b)(40)	"Subpart GG - Standards of Performance for Stationary Gas and Combustion Turbines"
AQR 14.1(b)(82)	"Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
AQR 14.1(b)(84)	"Subpart KKKK – Standards of Performance for Stationary Combustion Turbines"
AQR 14.1(b)(86)	"Subpart TTTT – Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units"
AQR 18	"Permit and Technical Service Fees"
AQR 21	"Acid Rain Continuous Emissions Monitoring"
AQR 22	"Acid Rain Permits"
AQR 25	"Affirmative Defense for Excess Emissions due to Malfunctions, Startup, and Shutdown"

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Citation	Title
AQR 26	"Emission of Visible Air Contaminants"
AQR 28	"Fuel Burning Equipment"
AQR 40	"Prohibitions of Nuisance Conditions"
AQR 41	"Fugitive Dust", AQR 41.1.2 only
AQR 42	"Open Burning"
AQR 43	"Odors in the Ambient Air"
AQR 70	"Emergency Procedures"
AQR 80	"Circumvention"

- 3. Clean Air Act Amendments (42 U.S.C. § 7401, et seq.)
- 4. Applicable 40 CFR sections are listed in Table 10-2.

Table 10-2: Applicable CFRs

Citation	Title	
40 CFR Part 52.21	"Prevention of significant deterioration of air quality"	
40 CFR Part 52.1470	"Approval and Promulgation of Implementation Plans, Subpart DD—Nevada"	
40 CFR Part 60, Subpart A	"General Provisions"	
40 CFR Part 60, Subpart GG	"Standards of Performance for New Stationary Sources 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 60, Subpart TTTT	"Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units"	
40 CFR Part 63, Subpart A	"General Provisions"	
40 CFR Part 63, Subpart ZZZZ	"National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"	
40 CFR Part 70	"State Operating Permit Programs"	
40 CFR Part 72	"Acid Rain Permits Regulation"	
40 CFR Part 73	"Acid Rain Sulfur Dioxide Allowance System"	
40 CFR Part 75	"Acid Rain Continuous Emission Monitoring"	
40 CFR Part 82	"Protection of Stratospheric Ozone"	

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11.0 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
inis submission is:	new	revised	I TOT ARE	permit remewar

STEP 1

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

Harry Allen Generating Station Facility (Source) Name	_{State} NV	Plant Code 7082
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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)
**3	Yes
**4	Yes
**5	Yes
**6	Yes
	Yes

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Facility (Source) Name (from STEP 1)

STEP 3 Permit Requirements

Read the standard requirements.

- The designated representative of each affected source and each affected unit at the source shall:
 - 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
 - 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:
 - Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (i) 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
 - 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.

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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 part77.
- (2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
 - Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - 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;
 - 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.
 - Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (v) 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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Facility (Source) Name (from STEP 1) Heavy Allen Generating Station

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 (1)	Date 5/1/2025
80/	

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Instructions for the Acid Rain Program Permit Application

The Acid Rain Program requires the designated representative to submit an Acid Rain permit application for each source with an affected unit. A complete Certificate of Representation must be received by EPA <u>before</u> the permit application is submitted to the title V permitting authority. A complete Acid Rain permit application, once submitted, is binding on the owners and operators of the affected source and is enforceable in the absence of a permit until the title V permitting authority either issues a permit to the source or disapproves the application.

Please type or print. If assistance is needed, contact the title V permitting authority.

- STEP 1 A Plant Code is a 4 or 5 digit number assigned by the Department of Energy=s (DOE) Energy Information Administration (EIA) to facilities that generate electricity. For older facilities, "Plant Code" is synonymous with "ORISPL" and "Facility" codes. If the facility generates electricity but no Plant Code has been assigned, or if there is uncertainty regarding what the Plant Code is, send an email to the EIA. The email address is EIA-860@eia.gov.
- STEP 2 In column "a," identify each unit at the facility by providing the appropriate unit identification number, consistent with the identifiers used in the Certificate of Representation and with submissions made to DOE and/or EIA. Do not list duct burners. For new units without identification numbers, owners and operators must assign identifiers consistent with EIA and DOE requirements. Each Acid Rain Program submission that includes the unit identification number(s) (e.g., Acid Rain permit applications, monitoring plans, quarterly reports, etc.) should reference those unit identification numbers in exactly the same way that they are referenced on the Certificate of Representation.

Submission Deadlines

For new units, an initial Acid Rain permit application must be submitted to the title V permitting authority 24 months before the date the unit commences operation. Acid Rain permit renewal applications must be submitted at least 6 months in advance of the expiration of the acid rain portion of a title V permit, or such longer time as provided for under the title V permitting authority's operating permits regulation.

Submission Instructions

Submit this form to the appropriate title V permitting authority. If you have questions regarding this form, contact your local, State, or EPA Regional Acid Rain contact, or call EPA's Acid Rain Hotline at (202) 343-9620.

Paperwork Burden Estimate

The public reporting and record keeping burden for this collection of information is estimated to average 8 hours per response. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.