

CLARK COUNTY
DEPARTMENT OF AIR QUALITY AND
ENVIRONMENTAL MANAGEMENT
500 South Grand Central Parkway, Box 555210, Las Vegas, Nevada 89155
Part 70 Operating Permit
Source: 533
Issued in accordance with the
Clark County Air Quality Regulations (AQR)

ISSUED TO: Nevada Power Company, Harry Allen Station

SOURCE LOCATION:

Apex Dry Lake Industrial Park
Apex Valley, Nevada
T17S, R63E, Sections 23, 35, and 36
Hydrographic Basin Number: 216

COMPANY ADDRESS:

P.O. Box 98910, MS #30
Las Vegas, NV 89151

NATURE OF BUSINESS:

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

RESPONSIBLE OFFICIAL:

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

Permit Issuance Date: October 20, 2009 Expiration Date: October 19, 2014

**ISSUED BY: CLARK COUNTY DEPARTMENT OF AIR QUALITY AND ENVIRONMENTAL
MANAGEMENT**



Tina Gingras
Assistant Director, Clark County DAQEM

EXECUTIVE SUMMARY

Harry Allen Station is an electrical power generating station located at Apex Dry Lake Industrial Park. The legal description of the source location is as follows: portions of T17S, R63E, Sections 23, 25, and 36 in Apex Valley, County of Clark, State of Nevada. Harry Allen Station is situated in hydrographic area 216 (Garnet Valley). Garnet Valley is designated as unclassified nonattainment area for 8-hour ozone (regulated through NO_x and VOC) and is attainment area for PM₁₀, CO, and SO₂.

Harry Allen Station is a major source for PM₁₀, NO_x, CO, and TCS and is minor for SO_x, VOC and HAP. The Harry Allen Station operates two combustion turbines in the simple cycle mode: one General Electric Frame PG 7111-EA CTG referred to as Unit 3 (EU: 53301) with a nominally rated capacity of 79.2 MW and one General Electric PG 7 EA CTG referred to as Unit 4 (EU: A09) with a nominally rated capacity of 75 MW. An ATC was issued on June 10, 2001, for two combined cycle CTGs and an ammonia storage tank. These units are ATC only and not incorporated into the Part 70 Operating Permit. Operation of Units 3 and 4 are limited to 6,135 and 3,300 annual hours, respectively, and each fire natural gas only. Other operating emission units include three emergency generators and a diesel emergency fire pump. This Part 70 Operating Permit is issued based on the Title V Renewal application submitted on February 20, 2007 and the Title V Revision application submitted on March 30, 2007.

The following table is for information purposes only and summarizes the source potential to emit for each regulated air pollutant from all emission units for which an ATC has been issued:

PM₁₀	NO_x	CO	SO_x	VOC	TCS (NH₃)	HAP
150.57	303.07	277.03	14.24	64.47	215.60	5.64

The following table is for information purposes only and summarizes the source PTE for each regulated air pollutant for all emission units addressed by this Part 70 operating permit:

PM₁₀	NO_x	CO	SO_x	VOC	TCS (NH₃)	HAP
50.17	131.27	187.67	5.44	8.27	0.00	1.04

Pursuant to AQR 19.4.2, all terms and conditions in Sections I through VII and attachments 1 and 2 in this permit are federally enforceable unless explicitly denoted otherwise.

TABLE OF CONTENTS

I.	ACRONYMS	4
II.	GENERAL CONDITIONS	5
	A. GENERAL REQUIREMENTS.....	5
	B. MODIFICATION, REVISION, RENEWAL REQUIREMENTS.....	5
	C. REPORTING/NOTIFICATIONS/PROVIDING INFORMATION REQUIREMENTS.....	6
	D. COMPLIANCE REQUIREMENTS	6
III.	SOURCE-WIDE PTE SUMMARY	9
IV.	EMISSION UNITS AND APPLICABLE REQUIREMENTS	9
	A. Emission Units	9
	B. Emission Limitations and Standards.....	9
	1. Emission Limits	9
	2. Production Limits.....	11
	3. Emission Controls	11
	C. Monitoring	12
	D. Testing	13
	E. Record Keeping	14
	F. Reporting	15
	G. Mitigation	16
V.	ACID RAIN REQUIREMENTS	16
VI.	OTHER REQUIREMENTS	17
VII.	PERMIT SHIELD	17
	ATTACHMENT 1	18
	ATTACHMENT 2	20

I. ACRONYMS

Table I-1: Acronyms

Acronym	Term
AQR	Clark County Air Quality Regulations
ATC	Authority to Construct
CAAA	Clean Air Act, as amended
CEMS	Continuous Emissions Monitoring System
CFC	Chlorofluorocarbon
CFR	United States Code of Federal Regulations
CO	Carbon Monoxide
CTG	Combustion Turbine-Generator
DAQEM	Clark County Department of Air Quality & Environmental Management
DLN	Dry Low-NO _x
EPA	United States Environmental Protection Agency
EU	Emission Unit
HAP	Hazardous Air Pollutant
HCFC	Hydrochlorofluorocarbon
HHV	Higher Heating Value
HP	Horse Power
kW	kilowatt
LHV	Lower Heating Value
MMBtu	Millions of British Thermal Units
M/N	Model Number
MW	Megawatt
NAICS	North American Industry Classification System
NO _x	Nitrogen Oxides
NRS	Nevada Revised Statutes
OP	Operating Permit
PM ₁₀	Particulate Matter less than 10 microns
ppm	Parts per Million
ppmvd	Parts per Million, Volumetric Dry
PTE	Potential to Emit
QA/AC	Quality Assurance/Quality Control
RATA	Relative Accuracy Test Audits
RMP	Risk Management Plan
SCC	Source Classification Codes
scf	Standard Cubic Feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
S/N	Serial Number
SO _x	Sulfur Oxides
TCS	Toxic Chemical Substance
ULN	Ultra Low-NO _x
VOC	Volatile Organic Compound

II. GENERAL CONDITIONS

A. GENERAL REQUIREMENTS

1. The Permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act (Act) and is grounds for enforcement action; for permit termination, revocation and reissuance or modification; or for denial of a permit renewal application. *[AQR 19.4.1.6.a]*
2. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall not be affected and shall remain valid. *[AQR 19.4.1.5]*
3. The Permittee shall pay all permit fees pursuant to AQR Section 18. Failure to pay Part 70 permit fees may result in citations or suspensions or revocation of the Part 70 Permit. *[AQR 19.4.1.7]*
4. The permit does not convey any property rights of any sort, or any exclusive privilege. *[AQR 19.4.1.6.d]*
5. The Permittee shall not hinder, obstruct, delay, resist, interfere with, or attempt to interfere with the Control Officer, or any individual to whom authority has been duly delegated for the performance of any duty by the AQR. *[AQR 5.1]*
6. The Permittee owning, operating, or in control of any equipment or property who shall cause, permit, or participate in any violation of the AQR shall be individually and collectively liable to any penalty or punishment imposed by and under the AQR. *[AQR 8.1]*
7. The Permittee shall continue to comply with applicable requirements for which the Permittee is in compliance. *[AQR 19.3.3.8.b]*
8. Any Permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. *[AQR 19.3.2]*
9. The Permittee may request confidential treatment of any records in accordance with AQR Section 19. Emission data, standards or limitations [all terms as defined in 40 CFR 2.301(a)] or other information as specified in 40 CFR 2.301 shall not be considered eligible for confidential treatment. The Administrator and the Control Officer shall each retain the authority to determine whether information is eligible for confidential treatment on a case-by-case basis. *[AQR 19.3.1.3 and 40 CFR 2.301]*

B. MODIFICATION, REVISION, RENEWAL REQUIREMENTS

1. The Permittee shall not make a modification, as defined in AQR Section 0, to the existing source prior to receiving an ATC from the Control Officer. *[AQR 12.1.1.1]*
2. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the Permittee for the permit modification, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *[AQR 19.4.1.6.c]*
3. Any request for a permit revision must comply with the requirements of AQR Section 19. *[AQR 19.5]*
4. The Permittee shall not build, erect, install or use any article, machine, equipment or process, the use of which conceals an emission, which would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR 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, provided the Permittee conforms to the applicable requirements of AQR Sections 12 and 58. [AQR 19.4.1.11]

6. For purposes of permit renewal, the Permittee shall submit a timely and complete application. A timely application is one submitted between six (6) months and 18 months prior to the date of permit expiration. [AQR 19.3.1.1.c]
7. Permit expiration terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with AQR Subsections 19.3.1.1.c and 19.5.2 in which case the permit shall not expire and all terms and conditions of the permit shall remain in effect until the renewal permit has been issued or denied. [AQR 19.5.3.2]

C. REPORTING/NOTIFICATIONS/PROVIDING INFORMATION REQUIREMENTS

1. The Permittee shall furnish to the Control Officer, within a reasonable time, any information that the Control Officer may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the Control Officer along with a claim of confidentiality. [AQR 19.4.1.6]
2. The Permittee shall allow the Control Officer or an authorized representative, upon presentation of credentials:
 - a. entry upon the Permittee's premises where the source is located, or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
 - b. access to inspect and copy, at reasonable times, any records that must be kept under conditions of the permit;
 - c. access to inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - d. access to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [AQR 4.3 and 19.4.3.2]
3. Upon request of the Control Officer, the Permittee shall provide such information or analyses as will disclose the nature, extent, quantity or degree of air contaminants which are or may be discharged by such source, and type or nature of control equipment in use, and the Control Officer may require such disclosures be certified by a professional engineer registered in the state. In addition to such report, the Control Officer may designate an authorized agent to make an independent study and report as to the nature, extent, quantity or degree of any air contaminants which are or may be discharged from source. An authorized agent so designated is authorized to inspect any article, machine, equipment, or other contrivance necessary to make the inspection and report. [AQR 4.4]

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 to maintain compliance with the terms and conditions of this permit. [AQR 19.4.1.6.b]

2. Any person who violates any provision of this operating permit, including, but not limited to, any application requirement; any permit condition; any fee or filing requirement; any duty to allow or carry out inspection, entry or monitoring activities or any requirements by DAQEM is guilty of a civil offense and shall pay civil penalty levied by the Air Pollution Control Hearing Board/Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. *[AQR 9.1]*
3. Any person aggrieved by an order issued pursuant to AQR 9.1 is entitled to review as provided in Chapter 233B of NRS. *[AQR 9.12]*
4. The Permittee of any stationary source or emission unit that fails to demonstrate compliance with the emissions standards or limitations shall submit a compliance plan to the Control Officer pursuant to AQR Section 10. *[AQR 10.1]*
5. The Permittee shall comply with the requirements of 40 CFR 61, Subpart M, of the National Emission Standard for Asbestos for all demolition and renovation projects. *[AQR 13.1.7]*
6. Requirements for compliance certification with terms and conditions contained in the operating permit, including emission limitations, standards, or work practices, are as follows:
 - a. the Permittee shall submit compliance certifications annually in writing to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) and the Administrator at USEPA Region IX (Director, Air and Toxics Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for the previous calendar year will be due on January 30 of each year;
 - b. compliance shall be determined in accordance with the requirements detailed in AQR 19.4.1.3, record of periodic monitoring, or any credible evidence; and
 - c. the compliance certification shall include:
 - i. identification of each term or condition of the permit that is the basis of the certification;
 - ii. the Permittee's compliance status and whether compliance was continuous or intermittent;
 - iii. methods used in determining the compliance status of the source currently and over the reporting period consistent with Subsection 19.4.1.3; and
 - iv. other specific information required by the Control Officer to determine the compliance status of the source. *[AQR 19.4.3.5]*
7. The Permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1]*
 - a. The annual emissions inventory shall be received by DAQEM no later than March 31 after the reporting year.
 - b. The report shall include the emission factors and calculations used to determine the emissions from each permitted emission unit, even when an emission unit is not operated.
8. The Permittee shall report to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) any upset, breakdown, malfunction, emergency or deviation which cause emissions of regulated air pollutants in excess of any limits set by regulation or by this permit. The report shall be in two parts as specified below *[AQR 25.2]*:
 - a. within one (1) hour of the onset of the event, the report shall be communicated by phone (702) 455-5942, or by fax (702) 383-9994.
 - b. as soon as practicable but not exceeding ten (10) calendar days from the onset of the event, the detailed written report shall be submitted. Such reports shall include the probable cause of the excess emissions, emission calculations and any corrective actions taken.

9. The Permittee shall report to the Control Officer deviations that do not result in excess emission, with the quarterly reports. Such reports shall include the probable cause of deviations and any corrective actions or preventative measures taken. [AQR 19.4.1.3]
10. The Permittee shall include a certification of truth, accuracy, and completeness by a responsible official when submitting any application form, report, or compliance certification pursuant to this operating permit. This certification and any other certification required shall state, "Based on the information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete." This statement shall be followed by the signature and printed name of the responsible official certifying compliance and the date of signature. [AQR 19.3.4]

E. PERFORMANCE TESTING REQUIREMENTS

1. Upon request of the Control Officer, the Permittee shall test or have tests performed to determine the emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of that allowed by the DAQEM regulations is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice. The Control Officer may observe the testing. All tests shall be conducted by reputable, qualified personnel. The Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) shall be given a copy of the test results in writing and signed by the person responsible for the tests. [AQR 4.5]
2. Upon request of the Control Officer, the Permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. [AQR 4.6]
3. The Permittee shall submit for approval a performance testing protocol which contains testing, reporting, and notification schedules, test protocols, and anticipated test dates to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) not less than 45 nor more than 90 days prior to the anticipated date of the performance test. [AQR 14.10]
4. The Permittee shall submit to EPA for approval any alternative test methods that are not already approved by EPA. [AQR 14.1 and 40 CFR 60.8(b)]
5. The Permittee shall submit a report describing the results of each performance test to the Control Officer within 60 days from the end of the performance test. [AQR 14.12]
6. The Control Officer may require additional or more frequent performance testing. [AQR 4.5]

III. SOURCE-WIDE PTE SUMMARY

[Authority for all values, limits, and conditions in this section: NSR ATC Modification 6, Revision 3, Condition IV-B-1(a) (04/16/09)]

Nevada Power Harry Allen Station, as addressed by this Part 70 permit, is a major source for NO_x and CO and a minor source for PM₁₀, SO_x, VOC, and HAP. The emission rates listed in Table III-1 are not source-wide emission limits and are only used for determining the major source status.

Table III-1: Source-Wide PTE (tons per year)

Pollutants	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
PTE Totals	50.17	131.27	187.67	5.44	8.27	1.04
Major Source Thresholds	100	100	100	100	100	25 ¹

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

IV. EMISSION UNITS AND APPLICABLE REQUIREMENTS

A. Emission Units

The stationary source covered by this Part 70 OP is defined to consist of the emission units and associated appurtenances summarized in Table IV-A-1. [NSR ATC Modification 6, Revision 3, Section IV-A (04/16/09)]

Table IV-A-1: List of Emission Units

EU	Description	Model Number	Serial Number
A07 ¹	Perkins Engine, Katolight Diesel Emergency Generator; 400 hp	N37881	--
A08 ²	Caterpillar Diesel Emergency Generator; 350 kW	3406	4ZR08055
A09	General Electric 75 MW natural gas only turbine; MEQ = 28 (Turbine Unit 4)	MS7001EA (PG7121)	298532
A10	Clarke-Detroit Diesel Emergency Fire Pump; 175 hp	50348312	--
53301	GE CTG 79.2 MW natural gas only turbine; MEQ = 53 (Turbine Unit 3)	MS7001EA	296449
53302	Cummins Diesel Emergency Generator; 900 hp	CTA-28-65	25195586

¹ Located at the Harry Allen substation.

² Located at the Harry Allen switchyard.

Emission Limitations and Standards

1. Emission Limits

- a. Neither the actual nor allowable emissions from each emission unit shall exceed the PTE listed in Table IV-B-1. Tons-per-year emission limits of each emission unit include startup and shutdown emissions. [NSR ATC Modification 6, Revision 3, Conditions IV-B-1(a) and (b) (04/16/09)]

Table IV-B-1: Emission Unit PTE, Including Startup and Shutdowns (tons per rolling 12-months)

EU	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
A07	0.07	0.94	0.20	0.06	0.08	0.01
A08	0.21	0.69	0.72	0.12	0.01	0.01
A09 (Turbine Unit 4)	19.21	39.06	33.94	1.22	3.47	0.37
A10	0.01	0.05	0.01	0.01	0.01	0.01
55301 (Turbine Unit 3)	30.60	88.60	152.50	4.01	4.60	0.63

EU	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
55302	0.07	1.93	0.30	0.02	0.10	0.01

- b. Neither the actual nor allowable emissions from each emission unit shall exceed the PTE listed in Table IV-B-2. Pound-per-hour limits are normal operation (exclude startup and shutdown) limits only. 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 IV-C. [NSR ATC Modification 6, Revision 3, Conditions IV-B-1(a), (b) and (c) (04/16/09)]

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

EU	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
A09 (Turbine Unit 4)	9.98	19.50	8.90	0.64	1.80	1.09
55301 (Turbine Unit 3)	10.00	28.80	49.70	NL ¹	1.50	NL ¹

¹NL = No Limit.

- c. Neither the actual nor allowable emissions from each emission unit shall exceed the PTE listed in Table IV-B-3. The Short-term emission limits are based on an averaging period as listed and represent normal operation (exclude startup and shutdown) limits only. [NSR ATC Modification 6, Revision 3, Conditions IV-B-1(a) and (b) (04/16/09)]

Table IV-B-3: Emission Limitations Excluding Startup and Shutdown

EU	NO _x @ 15% O ₂
53301 (Turbine Unit 3) ¹	9.0 ppmvd
A09 (Turbine Unit 4) ²	5.0 ppmvd

¹ Limits based on a 3-hour averaging period.

² Limits based on a 1-hour averaging period.

- d. Neither the actual nor allowable emissions from each emission unit shall exceed the PTE listed in Tables IV-B-4 and IV-B-5. [NSR ATC Modification 6, Revision 3, Conditions IV-B-1(a) and (b) (04/16/09)]

Table IV-B-4: Startup and Shutdown PTE for Turbine Unit 4 (EU: A09)¹

EU	PM ₁₀	NO _x	CO	SO _x	VOC
Startup (pounds per event)	9.98	40.00	80.00	0.64	1.80
Shutdown (pounds per event)	9.98	10.00	60.00	0.64	1.80
Total startup/shutdown (tons per year)	2.70	6.90	19.30	0.20	0.50

¹ Actual emissions shall be included in the annual mass emission reporting. Estimated tonnages of startup emissions are included in the operational PTE in Table IV-B-1.

Table IV-B-5: Startup and Shutdown Emissions for Turbine Unit 4 (EU: A09)¹ (pounds per hour)

EU	NO _x	CO	SO _x
Startup (pounds per hour)	51.05	85.04	1.00
Shutdown (pounds per hour)	23.98	66.38	1.10
Combined startup/shutdown (pounds per hour)	55.53	142.52	1.46

¹ Actual emissions shall be included in the annual mass emission reporting. Estimated tonnages of startup emissions are included in the operational PTE in Table IV-B-1.

- e. The Permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20 percent opacity for a period of more than

6 consecutive minutes. *[NSR ATC Modification 6, Revision 3, Condition IV-B-1(d) (04/16/09)]*

2. Production Limits

- a. The Permittee shall limit operation of each turbine unit to the fuel limits listed in Table IV-B-6: *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(a) (04/16/09)]*

Table IV-B-6: Enforceable Fuel Limitations for Turbine Units

Equipment	Fuel Type	Max. Hourly MMBtu
Turbine Unit 3 (53301)	Natural gas only	873.1 (Based on LHV)
Turbine Unit 4 (A09)	Natural gas only	1,060 (Based on HHV)

- b. The Permittee shall limit operation of Turbine Unit 3 (EU: 53301) up to 20 hours per day and a total of 6,135 hours per year. *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(c) (04/16/09)]*
- c. The Permittee shall limit operation of Turbine Unit 4 (EU: A09) to up to 3,300 hours per year. *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(d) (04/16/09)]*
- d. For Turbine Unit 3 (EU: 53301), startup shall be defined as the 60-minute period immediately following the commencement of fuel combustion. Shutdown means the period immediately preceding the cessation of firing of a turbine not to exceed 60 consecutive minutes. *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(f) (04/16/09)]*
- e. For Turbine Unit 4 (EU: A09), startup shall be defined as the period immediately following the commencement of fuel combustion not to exceed 180 minutes. Shutdown means the period immediately preceding the cessation of firing of a turbine not to exceed 60 consecutive minutes. *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(g) (04/16/09)]*
- f. The Permittee shall limit operation of each diesel emergency generator (EUs: A07, A08, and 53302) to a total of 150 hours per rolling, 12-month period for testing and maintenance purposes. There are no restrictions for operating during emergencies as defined in AQR Section 0. *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(h) (04/16/09)]*
- g. The Permittee shall limit operation of the 175 hp diesel emergency fire pump (EU: A10) for testing and maintenance purposes to a total of 26 hours per rolling, 12-month period. There are no restrictions for operating during emergencies as defined in AQR Section 0. *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(i) (04/16/09)]*
- h. The emergency generators and the diesel fire pump engine shall combust only low sulfur (<0.05 percent sulfur by weight) diesel fuel. *[NSR ATC Modification 6, Revision 3, Conditions IV-B-2(h) and (i) (04/16/09)]*

3. Emission Controls

- a. At all times, including periods of startup, shutdown and malfunction, the Permittee shall under all conditions, 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)]*

- b. NO_x exhaust emissions shall be controlled on Turbine Unit 3 (EU: 53301) with the use of the General Electric DLN combustor in accordance with manufacturer's specifications and good combustion practice. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(b) (04/16/09)]*
- c. NO_x exhaust emissions from Turbine Unit 4 (EU: A09) shall be controlled with the use of an ULN combustor in accordance with manufacturer's specifications and good combustion practice. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(c) (04/16/09)]*
- d. An oxidation catalyst for the control of CO and VOCs shall be installed on Turbine Unit 4 (EU: A09) and shall be maintained and operated on the turbine unit in accordance with manufacturer's specifications. The catalysts shall be operated at all times the associated turbine unit is operating, excluding periods of startup and shutdown. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(g) (04/16/09)]*
- e. SO_x exhaust emissions from any turbine unit shall be controlled by the exclusive use of pipeline quality natural gas and good combustion practice. Sulfur content of natural gas fuel shall not exceed 0.5 grains per 100 scf. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(i) (04/16/09)]*
- f. Per manufacturer's specifications and good operating practice, PM₁₀ exhaust emissions from each turbine unit shall be controlled by properly maintained and periodically replaced inlet air filters preceding each turbine. *[NSR ATC Modification 6, Revision 3, Condition IV-B-3(j) (04/16/09)]*
- g. Pursuant to AQR Section 43, this source shall be operated in a manner such that odors will not cause a nuisance. *[NSR ATC Modification 6, Revision 3, Condition II-15 (04/16/09)]*
- h. 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. *[NSR ATC Modification 6, Revision 3, Condition IV-B-2(l) (04/16/09)]*

B. Monitoring

- 1. To demonstrate continuous direct compliance with all emission limitations for NO_x and CO specified in Section IV-B of this permit, the Permittee shall install, calibrate, maintain, operate, and certify CEMS for NO_x, CO, and O₂ or CO₂ on each turbine unit in accordance with 40 CFR 75 and 40 CFR 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: *[AQR 19.4.1.3(a) and 40 CFR 75, Subpart F]*
 - a. exhaust gas concentrations (in ppm) of NO_x, CO, and diluent O₂ or CO₂ for all turbine units (EUs: 53301 and A09) 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. 3-hour rolling averages of each NO_x and CO concentrations (in ppm) for Turbine Unit 3 (EU: 53301);
 - f. 1-hour rolling averages of each NO_x and CO concentrations (in ppm) for Turbine Unit 4 (EU: A09);

- g. hourly and rolling 12-month accumulated mass emissions (in pounds) of NO_x and CO; and
 - h. hours of downtime of the CEMS.
2. All emission recorded by the Turbine Unit 4 CEMS shall be reported in clock hour increments. Compliance with the emission limits in Table IV-B-4 for CO, NO_x, and SO₂ shall be demonstrated by documenting compliance with hourly limits for startup and shutdown in Table IV-B-5. Any clock hour that contains at least 1 minute of a startup event shall be subject to the startup hourly limit. Any clock hour that contains at least 1 minute of a shutdown event shall be subject to the shutdown hourly limit. Any clock hour that contains at least 1 minute of a startup event and 1 minute of a shutdown event shall be subject to the combined startup and shutdown hourly emissions limit, in order to document joint compliance with the limits in Tables IV-B-2 and IV-B-4. [AQR 19.4.1.3(a)]
 3. The Permittee shall maintain a quality assurance plan that includes auditing schedules, reporting schedules, design specifications, and other quality assurance requirements for each CEMS. [40 CFR 75]
 4. 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 19.4.1.3(a)]
 5. The Permittee shall conduct RATA of the CO, NO_x, and diluents O₂ or CO₂ CEMS at least annually. [AQR 19.4.1.3(a)]
 6. 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]
 7. Any exceedance of the hourly, 1-hour or 3-hour rolling average, or 12-month rolling total NO_x and/or CO emissions limitations expressed in Section IV as determined by the respective CEMS shall be considered a violation of the emission limits imposed in this permit and may result in enforcement action. Compliant CEMS data, however, does not preclude the use of other credible evidence in determining or showing compliance. [AQR 19.4.1.3(a)]
 8. The Permittee shall verify compliance with fuel gas sulfur content in accordance with 40 CFR 60.334(h). [AQR 19.4.1.3(a) and 40 CFR 60.334(h)]
 9. The Permittee shall perform at least one visual emissions check each calendar quarter. The quarterly visual checks shall include the diesel-fired emergency generators and fire pump (EUs: A07, A08, A10, and 53302) while operating, not necessarily simultaneously, to demonstrate compliance with the opacity limit. If any of the diesel-fired emergency generators or fire pump does not operate during the calendar quarter, then no observation of that unit shall be required. If visible emissions are observed, then corrective actions shall be taken to minimize the emissions and the opacity of emissions shall be visually determined in accordance with 40 CFR 60 Appendix A: Reference Method 9. [AQR 19.4.1.3(a) and 40 CFR 70.6]

C. Testing

Initial performance tests for Turbine Unit 3 were conducted in 1995. Initial performance tests for Turbine Unit 4 were conducted in 2006.

1. To demonstrate compliance with the hourly and annual emission limitations for NO_x, CO, VOCs, and PM₁₀ for Turbine Units 3 and 4 specified in Part IV-B, Tables IV-B-1 and IV-B-2 as well as the opacity limitation in Condition IV-B-1(c) of this permit, the Permittee shall conduct a performance test for NO_x, CO, VOC, PM₁₀, and opacity within 90 days of each five-year anniversary date of the previous performance test. [AQR 19.4.3.1]

2. Performance testing is subject to 40 CFR 60 Subpart A; 40 CFR 60 Subpart GG; and DAQEM's Guideline on Performance Testing. [AQR 14.1.56 and 19.4.3.1 and 40 CFR 60.335]
3. Table IV-D-1 summarizes NO_x, CO, VOC, PM₁₀ and opacity performance test methods for all combustion turbines. [AQR 19.4.3.1]

Table IV-D-1: Performance Testing Protocol Requirements for Turbines

Test Point	Pollutant	Method (40 CFR 60, Appendix A)
Turbine Exhaust Outlet Stack	VOC	EPA Method 18 or 25a
Turbine Exhaust Outlet Stack	PM ₁₀	EPA Method 201/202 or 201A/202
Turbine Exhaust Outlet Stack	NO _x	Chemiluminescence Analyzer (EPA Method 7E)
Turbine Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Turbine Exhaust Outlet Stack	Opacity	EPA Method 9
Stack Gas Parameters	---	EPA Methods 1, 2, 3, 4

D. Record Keeping

1. The Permittee shall record the following: [AQR 19.4.1.3(b)]
Turbine Units (EUs: A09 and 53301):
 - a. the magnitude and duration of excess emissions, notifications, monitoring system performance, malfunctions, corrective actions taken, etc., as required by 40 CFR 60.7;
 - b. CEMS audit results, RATA, corrective actions, etc., as required by 40 CFR 60 and the CEMS quality assurance plan;
 - c. time, duration, nature, and probable cause of any CEMS downtime and corrective actions taken;
 - d. daily hours of operation with monthly totals for each turbine;
 - e. dates, times, and duration of each startup and shutdown event;
 - f. startup and shutdown short-term total emissions for Turbine Unit 4 (EU: A09) in pounds per hour and annual emissions for all turbines in tons per year (12-month rolling total);
 - g. monthly and rolling, 12-month total quantity of natural gas consumed in each gas turbine;
 - h. hourly heat input to each turbine unit; andIC Engines (EUs: A07, A08, A10, and 53302):
 - i. monthly and rolling, 12-month total hours of operation of each emergency generator and fire pump for testing and maintenance purposes and a separate log for operation during emergencies.
2. The Permittee shall maintain records on site that include, at a minimum: [AQR 19.4.1.3(b)]
 - a. sulfur content of diesel fuel as certified by the supplier;
 - b. sulfur content of natural gas as determined by Condition IV-C-8;
 - c. each CEMS "out-of-control" period, as defined in 40 CFR 75, Appendix B;
 - d. log of visual emissions checks;
 - e. results of performance testing conducted;

- f. certificates of representation for the designated representative and the alternate designated representative that meet all requirements of 40 CFR 72.24;
 - g. copies of all reports, compliance certifications, other submissions, and all records made or required under the Acid Rain Program;
 - h. 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;
 - i. all CEMS information required by the CEMS monitoring plan as specified in 40 CFR 75 Subpart F; and
 - j. manufacturer's operation specifications for turbine units and oxidation catalyst controls.
3. For all inspections, visible emission checks, and testing required under monitoring, logs, reports, and records shall include at least the date and time, the name of the person performing the action, the results or findings, and the type of corrective action taken (if required). *[AQR 19.4.1.3(b)]*
 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 4.4 and 19.4.3.2]*
 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 DAQEM upon request. *[AQR 19.4.1.3(b)]*
 6. The Control Officer reserves the right to require additional requirements concerning records and record keeping for this source. *[AQR 19.4.1.3(b)]*

E. Reporting

1. All report submissions shall be addressed to the attention of the Control Officer. *[AQR 14.3, 21.4, and 22.4]*
2. All reports shall contain the following: *[AQR 19.4.1.3(c) and 19.3.4]*
 - 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 are true, accurate and complete." (A sample form is available from DAQEM); and
 - b. a certification signature from a responsible official of the company and the date certification.
3. The Permittee shall submit quarterly reports to DAQEM. *[19.4.1.3(c)]*
4. The following requirements apply to quarterly reports: *[AQR 19.4.1.3(c)]*
 - a. The report shall include a quarterly summary of each item listed in Condition IV-E-1
 - b. The report shall include the item listed in Section IV-E-2(f) if different from previous.
 - c. The report shall be based on a calendar quarter, which includes partial calendar quarters.
 - d. The report shall be submitted to the Control Officer within 30 calendar days after the calendar quarter.

5. Regardless of the date of issuance of this Operating Permit, the source shall comply with the schedule for report submissions outlined in Table IV-F-1: *[AQR 19.4.1.3(c)]*

Table IV-F-1: Required Report Submission Dates

Required Report	Applicable Period	Due Date ¹
Quarterly Report for 1 st Calendar Quarter	January, February, March	April 30 each year
Quarterly Report for 2 nd Calendar Quarter	April, May, June	July 30 each year
Quarterly Report for 3 rd Calendar Quarter	July, August, September	October 30 each year
Quarterly Report for 4 th Calendar Quarter, Any additional annual records required.	October, November, December	January 30 each year
Annual Compliance Certification Report	12 Months	30 days after the Operating Permit issuance anniversary date
Annual Emission Inventory Report	Calendar Year	March 31 each year
Excess Emission Notification	As Required	Within one (1) hour of the onset of the event
Excess Emission Report	As Required	As soon as practicable but not to exceed ten (10) calendar days from onset of the event
Deviation Report	As Required	Along with quarterly reports
Performance Testing	As Required	Within 60 days from the end of the test

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

6. The designated representative or alternate designated representative of an affected source and each and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 72, 40 CFR 73, and 40 CFR 75. *[40 CFR 72.9(f)]*
7. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit conditions, permit requirements, and requirements of applicable federal regulations. *[AQR 4.4 and AQR 19.4.1.3(c)]*

F. Mitigation

The source has no federal offset requirements. *[AQR 59.1.1]*

V. ACID RAIN REQUIREMENTS

- In accordance with the provisions of Title IV of the Clean Air Act and 40 C.F.R. Parts 72 through 77, this Acid Rain Permit is issued to Nevada Power Harry Allen Station, Apex Dry Lake Industrial Park, Clark County NV.
- All terms and conditions of the permit are enforceable by DAQEM and EPA under the Clean Air Act. *[40 CFR 72]*
- The permittee shall comply with all the applicable requirements of the Acid Rain Permit Application located in Attachment 2. *[40 CFR 72.30]*
- This Acid Rain permit incorporates the definitions of terms in 40 CFR Part 72.2.
- This permit is valid for a term of five (5) years from the date of issuance unless a timely and complete renewal application is submitted to DAQEM. *[40 CFR 72.69]*
- A timely renewal application is an application that is received at least six months prior to the permit expiration date. *[40 CFR 72.30]*

7. Emissions from this source shall not exceed any allowances that the source lawfully holds under Title IV of the Act or its regulations. *[AQR 19.4.1.4 and 40 CFR 70.6(a)(4)]*

VI. 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]*

VII. PERMIT SHIELD

Compliance with the terms contained in this permit shall be deemed compliance with the following applicable requirements in effect on the date of permit issuance: *[19.4.6]*

Table VI-1: Applicable Requirements Related to Permit Shield

Citation	Title
CCAQR Section 14.1.56 Subpart GG	Standards of Performance for New Stationary Sources (NSPS) – Stationary Gas Turbines

**ATTACHMENT 1
 APPLICABLE REGULATIONS**

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE:

1. Applicable AQR Sections:

Citation	Title
AQR Section 0	Definitions
AQR Section 4	Control Officer
AQR Section 5	Interference with Control Officer
AQR Section 8	Persons Liable for Penalties – Punishment: Defense
AQR Section 9	Civil Penalties
AQR Section 10	Compliance Schedule
AQR Section 11	Ambient Air Quality Standards
AQR Section 12	Preconstruction Review for New or Modified Stationary Sources
AQR Section 12.5	Air Quality Models
AQR Section 14.1.56	Standards of Performance for New Stationary Sources (NSPS) – Standards of Performance for Gas Turbines
AQR Section 17	Dust Control Permit for Construction Activities Including Surface Grading and Trenching
AQR Section 18	Permit and Technical Service Fees
AQR Section 19	40 CFR Part 70 Operating Permits
AQR Section 21	Acid Rain Continuous Emissions Monitoring
AQR Section 22	Acid Rain Permits
AQR Section 24	Sampling and Testing - Records and Reports
AQR Section 25	Upset/Breakdown, Malfunctions
AQR Section 26	Emissions of Visible Air Contaminants
AQR Section 28	Fuel Burning Equipment
AQR Section 29	Sulfur Contents of Fuel Oil
AQR Section 40	Prohibition of Nuisance Conditions
AQR Section 41	Fugitive Dust
AQR Section 42	Open Burning
AQR Section 43	Odors in the Ambient Air
AQR Section 55	Preconstruction review for New or Modified Stationary Sources in the 8-Hour Ozone Nonattainment Area
AQR Section 60	Evaporation and Leakage
AQR Section 70	Emergency Procedures
AQR Section 80	Circumvention

2. NRS, Chapter 445B.
3. CAAA, Authority: 42 U.S.C. § 7401, et seq.
4. Applicable 40 CFR Subsections:

Citation	Title
40 CFR 52.21	Prevention of Significant Deterioration (PSD)
40 CFR 52.1470	SIP Rules

Citation	Title
40 CFR 60, Subpart A	Standards of Performance for New Stationary Sources (NSPS) – General Provisions
40 CFR 60, Subpart GG	Standards of Performance for New Stationary Sources (NSPS) – Stationary Gas Turbines
40 CFR 60	Appendix A, Method 9 or equivalent, (Opacity)
40 CFR 70	Federally Mandated Operating Permits
40 CFR 72	Acid Rain Permits Regulation
40 CFR 73	Acid Rain Sulfur Dioxide Allowance System
40 CFR 75	Acid Rain Continuous Emission Monitoring
40 CFR 82	Protection of Stratospheric Ozone

Facility (Source) Name (from STEP 1) **Harry Allen**

Permit Requirements

STEP 3

Read the standard requirements.

- (1) The designated representative of each affected source and each affected unit at the source shall:
 - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (ii) Have an Acid Rain Permit.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the source or unit, as appropriate, with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the source's compliance account (after deductions under 40 CFR 73.34(c)), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the affected units at the source; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

Facility (Source) Name (from STEP 1) **Harry Allen**

Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

- (1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected source that has excess emissions in any calendar year shall:
- (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
- (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

Facility (Source) Name (from STEP 1) **Harry Allen**

Recordkeeping and Reporting Requirements, Cont'd.

STEP 3, Cont'd.

- (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.
- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating

Facility (Source) Name (from STEP 1) **Harry Allen**

Effect on Other Authorities, Cont'd.

STEP 3, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a source can hold; *provided*, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;

(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

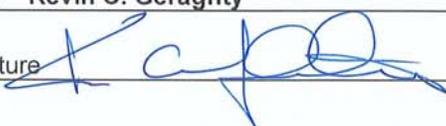
(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

STEP 4
Read the certification statement, sign, and date.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name Kevin C. Geraghty	
Signature 	Date 6/16/2009