



RESPONSE TO COMMENTS

DRAFT REVISED/RENEWAL CLASS 1 AIR QUALITY OPERATING PERMIT, REID GARDNER GENERATING STATION PUBLIC NOTICE AND PUBLIC HEARING

September 18, 2012

Introduction

On May 12, 2012, the Nevada Division of Environmental Protection, Bureau of Air Pollution Control (BAPC) provided Notices to the public of the BAPC's issuance of a draft revised/renewal Class 1 air quality operating permit for the Reid Gardner Generating Station. The Notice of Proposed Action ("NPA") and Notice of Public Hearing were published in the Las Vegas Review Journal on May 12, 2011. The NPA and the Director's Review and Preliminary Notice of Permit Issuance ("Director's Review") were mailed on May 12, 2011, to all individuals on the public mailing list maintained by the BAPC.

A copy of the draft permit was made available for public viewing and inspection at the Las Vegas-Clark County Library located at 833 Las Vegas Blvd. in North Las Vegas, and at the Clark County Library District-Mesquite located at 121 West 1st North Street in Mesquite.

On May 25, 2012, the BAPC published a Correction to the NPA to indicate that Nevada Power Company is the permit applicant, not NV Energy as stated in the NPA. In keeping with the Notice of Public Hearing, on June 12, 2012, the BAPC held a public hearing at the Moapa Valley Empowerment High School in Overton to discuss the proposed action and solicit public comment. Overton is located approximately ten miles south of the Reid Gardner Generating Station in eastern Clark County.

The BAPC received written comments from NV Energy and U.S. EPA Region 9, and verbal comments from the public during the June 12 hearing. The following document contains the responses to all the comments that were made.

Response to Comments provided by U.S. EPA Region 9

EPA Comment No. 1 (Emission Limits):

“All emission limits contained in the Operating Permit must be federally enforceable and specify averaging times that readily allow for a determination of compliance. Several emission limits in the Operating Permit do not contain explicitly averaging times. Short-term averaging times, generally less than daily, but not to exceed one month, should be employed. However, EPA policy allows for rolling limits not to exceed 12 months or 365 days if there is assurance that compliance can be readily determined and verified. NDEP must specify averaging times related to all emission limits. Please see the attached policy memo on limiting potential to emit.”

BAPC Response to EPA Comment No. 1:

The BAPC understands and agrees that all emissions limitations must be enforceable and provide for a determination of compliance. Unfortunately, EPA does not provide specific examples of the emission limits that they believe do not contain an explicit averaging period making it difficult to provide a specific response. Regardless, the BAPC believes that all of the emission limits in the draft operating permit contain averaging times that are consistent with the underlying applicable requirement, many of which are encompassed in the method of demonstrating compliance (see draft permit subsections 4 – Compliance, Monitoring, Recordkeeping and Reporting).

The BAPC is well versed in the referenced EPA policy, yet has conducted another detailed review based on EPA’s comment. The BAPC cannot find any reference to language in the policy that requires emissions limitations to have “explicitly (sic) averaging periods”. Likewise, the BAPC is unaware of any federal regulation(s) that require the same. The BAPC notes that many federal applicable requirements establish emissions limitations that do not contain an explicit averaging period. For example, EPA’s own New Source Performance Standard for utility generators is constructed accordingly as shown below:

§ 60.42Da Standards for particulate matter (PM).

- (a) *Except as provided in paragraph (f) of this section, on and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, an owner or operator of an affected facility shall not cause to be discharged into the atmosphere from any affected facility for which construction, reconstruction, or modification commenced before March 1, 2005, any gases that contain PM in excess of 13 ng/J (0.030 lb/MMBtu) heat input.*

Paragraph (a) contains no explicit averaging time and relies on the method of demonstrating compliance as the basis of the averaging period. Many other EPA standards contain similar emissions limitations that have no explicit averaging time. For these reasons, the BAPC does not agree that each emission limitation must contain an explicit averaging time as EPA suggests. Each emissions limitation has been established consistent with the underlying applicable requirement. For these reasons the BAPC proposes no change to the draft operating permit.

EPA Comment No. 2 (Compliance Assurance Monitoring (CAM)):

“CAM (40 CFR part 64) requirements apply additional monitoring requirements to emission units that use a control technology to meet a pollutant-specific emission limit and are not already required to continuously monitor compliance. NDEP’s Technical Review identifies emission units 1-4 as subject to CAM for PM. Based on the emission limits in the permit, we have determined that these units are also post-control major sources of PM. CAM (40 CFR 64.3(b)(4)(ii)) generally prescribes continuous monitoring systems for units that are post-control major. However, the CAM plan approved by NDEP requires one-daily pressure drop readings across each baghouse. NDEP should reevaluate the CAM plan in order to determine whether continuous particulate emissions monitoring or bag leak detection systems are appropriate for units 1-4.”

BAPC Response to EPA Comment No. 2:

The BAPC’s Technical Review identified Units 1 - 4 as post-emission control major sources for PM and PM₁₀ making these units subject to the 40 CFR part 64 CAM requirements. However, the BAPC disagrees with EPA’s assertion that 40 CFR 64.3(b)(4)(ii) prescribes continuous monitoring systems. Nowhere in 40 CFR Part 64 is a continuous monitoring system defined or otherwise required. 40 CFR 64.3(a) establishes the monitoring design criteria and 64.3(b) establishes the performance criteria for the monitoring system. 40 CFR 64.3(a) clearly states that the design of the monitoring system shall be such that it obtains data for one or more indicators of emissions control performance. The BAPC’s approval of pressure drop as an indicator of performance clearly meets the requirement of one or more indicators. Therefore, there is no requirement or need for the BAPC to reevaluate the CAM plan.

EPA Comment No. 3 (Regional Haze Rulemaking):

“Units 1, 2, and 3 at Reid Gardner are subject to Approval and Promulgation of Air Quality Implementation Plans; State of Nevada; Regional Haze State Implementation Plan (77 Federal Register 17334 March 26, 2012) which became effective on April 25, 2012. The aforementioned rulemaking established emissions limits for inhalable particulate matter (PM₁₀) and sulfur dioxide (SO₂) for all three units while additional emission limits for NO_x are currently being proposed. Although compliance for these emission limits is required within five years of promulgation of the rulemaking, NDEP should either discuss these limits in the Technical Review, similar to the MATS rule discussion, or include the appropriate emissions limits in the permit with their respective compliance plans.”

BAPC Response to EPA Comment No. 3:

The BAPC agrees that compliance with the Regional Haze emissions limitations is required within five years of the promulgation date. However, EPA suggests that the BAPC discuss the limits in the Technical Review or include the emissions limits in the permit with their respective compliance plans. The BAPC provided a discussion of the Regional Haze (BART) emissions limits for Reid Gardner Units 1 – 3 in Section 3.5 of the Technical Review document and suggests that EPA review this section of the document.

EPA Comment No. 4 (Dust Management Plan):

“A dust management plan was included with the title V Permit Application. The plan contains strategies for controlling fugitive dust from a variety of sources, but it does not include any monitoring for visible fugitive dust. In the Operating Permit, visible emissions monitoring requirements for some material handling units are biweekly or annual, while other units have no visible emissions monitoring requirements. NDEP should determine a monitoring methodology and monitoring frequency schedule to determine compliance with dust management plan.”

BAPC Response to EPA Comment No. 4:**Nevada Administrative Code (NAC) 445B.22037 reads as follows:**

NAC 445B.22037 Emissions of particulate matter: Fugitive dust. (NRS 445B.210)

1. No person may cause or permit the handling, transporting or storing of any material in a manner which allows or may allow controllable particulate matter to become airborne.

2. Except as otherwise provided in subsection 4, no person may cause or permit the construction, repair, demolition, or use of unpaved or untreated areas without first putting into effect an ongoing program using the best practical methods to prevent particulate matter from becoming airborne. As used in this subsection, “best practical methods” includes, but is not limited to, paving, chemical stabilization, watering, phased construction and revegetation.

3. Except as otherwise provided in subsection 4, no person may disturb or cover 5 acres or more of land or its topsoil until the person has obtained an operating permit for surface area disturbance to clear, excavate, or level the land or to deposit any foreign material to fill or cover the land.

4. The provisions of subsections 2 and 3 do not apply to:

(a) Agricultural activities occurring on agricultural land; or

(b) Surface disturbances authorized by a permit issued pursuant to [NRS 519A.180](#) which occur on land which is not less than 5 acres or more than 20 acres.

[Environmental Comm’n, Air Quality Reg. §§ 7.3.1 & 7.3.2, eff. 11-7-75; § 7.3.3, eff. 11-7-75; A 12-15-77]—(NAC A 9-19-90; 12-26-91; 12-13-93; 10-30-95)—(Substituted in revision for NAC 445B.365)

Subsection 1 of this regulation specifically prohibits controllable particulate matter (fugitive dust) from becoming airborne. This is accomplished through the use of best practical methods (see subsection 2) to ensure that controllable emissions do not become airborne. For this particular standard, fugitive dust is prohibited and the emphasis is placed on ensuring that appropriate methods of control are in place to meet the standard. The rule however does not require monitoring for emissions that are prohibited and instead the BAPC requires the submittal of a Dust Control Plan to ensure that appropriate controls will be utilized.

It should be noted that the applicability of this provision (and the subsequent Dust Control Plan) is limited to the activities specified in NAC 445B.22037 (handling, transporting or storing of materials, and the construction, repair, demolition, or use of unpaved or untreated areas). EPA’s comment appears to try to draw attention to material handling units that the BAPC failed to require fugitive dust monitoring for but unfortunately, EPA provides no specific example(s) of the units referenced. Therefore, the BAPC will assume that the units identified by EPA are those subject to the requirements of 445B.22037 and are not required to conduct monitoring for emissions for the reasons described above.

EPA Comment No. 5 (Minor Permit Revision – Emergency Engine Replacements):

“All equipment replacement detailed in the minor revision must be properly evaluated to determine whether a major or minor modification results from the changes at the facility. Per EPA’s PSD regulations, a major modification includes any physical change or change in the method of operation of a major stationary source that would result in a significant emissions increase of a regulated pollutant and a significant net emissions increase of that pollutant. 40 CFR §52.21(a)(2)(iv).

NDEP must evaluate whether the net emissions increase, as specified in 40 CFR §52.21(b)(3), resulting from the aggregate engine replacements for the existing units at RGPP is significant.

According to 40 CFR § 52.21(a)(2)(iv)(d) , for new units, a significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the difference between the potential to emit (as defined in paragraph (b)(4) of this section) from each new emissions unit following completion of the project and the baseline actual emissions (as defined in paragraph (b)(48)(iii) of this section) of these units before the project equals or exceeds the significant amount for that pollutant. The potential to emit of the existing units should not be used to estimate their historical emissions data. Historical air emissions for the existing units at RGPP should be quantified by determining their baseline actual emissions. As a result, NDEP did not properly determine whether the equipment replacement at RGPP will result in a significant emissions increase of NSR pollutant.”

BAPC Response to EPA Comment No. 5:

The BAPC agrees that an emissions increase analysis must be conducted to determine if the increase in emissions from the project is significant. The BAPC also agrees that the analysis contained in the Technical Review was confusing given that the existing emergency generator and fire pump were not previously permitted. Therefore, to ensure that the project will not be a major modification, the BAPC has conservatively assumed that the actual baseline emissions are equal to zero (i.e., took no credit for baseline actual emissions), and calculated the potential emissions for the project based on the proposed permit emissions levels. The potential emission increase resulting from the project is well below the PSD significance level for all pollutants as shown below.

Pollutant	Projected Actual Emissions (PAE)		Baseline Actual Emissions (BAE)		Potential Emission Increase (PAE-BAE)	PSD Significance Level (tons/yr)
	System 18 (tons/yr)	System 20 (tons/yr)	System 18 (tons/yr)	System 20 (tons/yr)		
NO _x	0.059	0.086	0	0	0.145	40
CO	0.017	0.055	0	0	0.072	100
PM	0.0024	0.0046	0	0	0.007	25
PM ₁₀	0.0024	0.0046	0	0	0.007	15
PM _{2.5}	0.0024	0.0046	0	0	0.007	10
VOC	0.0022	0.0048	0	0	0.007	40
SO ₂	0.020	0.036	0	0	0.056	40
GHG's CO ₂ e	11.3	20.4	0	0	31.7	75,000

Note: System 18 is the Unit #3 Emergency Diesel generator and System 20 is the Emergency Diesel Firewater Pump.

EPA Comment No. 6 (Fine Particulate Matter):

“Fine particulate matter (PM_{2.5}) is a regulated NSR pollutant that must be analyzed in new source review permitting. By excluding PM_{2.5} from its technical review of the emergency engine replacements, NDEP has not evaluated whether the engine replacements will result in a net emissions increase of all regulated NSR pollutants. According to 40 CFR § 52.21(b)(50)(i), a regulated NSR pollutant is any pollutant for which a national ambient air quality standard has been promulgated. EPA has promulgated primary and secondary national ambient air quality standards for PM_{2.5} with annual and 24-hour averaging times. Moreover, EPA has completed the revision of Test Method 202 – Condensable Particulate Matter. EPA’s transition period allowing for the exclusion of condensable PM ended on January 1, 2011. 40 CFR § 52.21(b)(50)(vi). Therefore, when permitting stationary sources, NDEP should quantify condensable PM emission, including PM_{2.5} emissions, and evaluate changes in PM_{2.5} emissions to determine all applicable requirements.”

BAPC Response to EPA Comment No. 6:

The BAPC has addressed fine particulate matter (PM_{2.5}) in its evaluation of the potential emission increase resulting from the project in its response to EPA Comment No. 6 above.

EPA Comment No. 7 (Acid Rain Permit):

“According to the Technical Review prepared by NDEP, the Class I Operating Permit for RGPP is intended to meet the requirements of title IV of the Clean Air Act and serve as an acid rain permit. The public must have the opportunity to review and comment on draft acid rain permits according to 40 CFR § 72.72(b)(1)(iii). The public notice issued by NDEP did not clearly state that the draft permit was also an acid rain permit, or that the acid rain permit application was included in the package of documents available for public review. However, NDEP did include acid rain provisions throughout the Operating Permit. A separate section dedicated to acid rain requirements would facilitate an easier review by EPA and the public to verify that the appropriate acid rain requirements and supporting

material have been incorporated into the title V permit. In the future, NDEP should help to ensure that the public can more easily recognize and review acid rain permits.”

BAPC Response to EPA Comment No. 7:

Thank you for your suggestion.

Response to Comments provided by NV Energy on behalf of Nevada Power Company

Note that in reviewing the draft operating permit to address NV Energy comments, the BAPC determined that the emission limit for the boilers for NO_x was incorrectly stated in pound per million Btu; this limit has been changed to pound per hour. Additionally, the Compliance/Performance Testing, Monitoring, and Recordkeeping Sections have been updated to reflect this change. Additionally, the draft operating permit has been changed to require reporting of emission results in both pound per million Btu and pound per hour for CO and VOC.

NV Energy Comment No. 1 (Requirement to Derive lb-PM/ton-coal):

Condition VI.A.4.a.x.(1): The PM emission limit for Reid Gardner Unit #1 (System 01) in the current Title V permit is 0.08 lb/MMBtu. The performance testing requirement requires PM to be reported in lb/MMBtu (VI.A.4.a.ix.(1)). Therefore, NVE respectfully requests that NDEP remove the requirement to derive lb-PM/ton-coal.

Condition VI.B.4.a.x.(1): The PM emission limit for Reid Gardner Unit #2 (System 02) in the current Title V permit is 0.08 lb/MMBtu. The performance testing requirement requires PM to be reported in lb/MMBtu (VI.B.4.a.ix.(1)). Therefore, NVE respectfully requests that NDEP remove the requirement to derive lb-PM/ton-coal.

Condition VI.C.4.a.xi.(1): The PM emission limit for Reid Gardner Unit #3 (System 03) in the current Title V permit is 0.08 lb/MMBtu. The performance testing requirement requires PM to be reported in lb/MMBtu (VI.C.4.a.x.(1)). Therefore, NVE respectfully requests that NDEP remove the requirement to derive lb-PM/ton-coal.

Condition VI.D.4.a.xi.(1): The PM emission limit for Reid Gardner Unit #4 (System 04) in the current Title V permit is 0.03 lb/MMBtu. The performance testing requirement requires PM to be reported in lb/MMBtu (VI.D.4.a.x.). Therefore, NVE respectfully requests that NDEP remove the requirement to derive lb-PM/ton-coal.

BAPC Response to NV Energy Comment No. 1:

The requirement to derive lb-PM/ton-coal is a compliance demonstration requirement contained in the original Title V permit (for example, see Paragraph A.4.a.(7) of Section VI). The requirement is based on *NAC 445B.22027 Emission of particulate matter: Maximum allowable throughput for calculating emission rates*, which requires a maximum allowable particulate matter (PM) emission rate based on the throughput of coal. The lb-PM/ton-coal is in place to demonstrate compliance during periods outside of emission testing. Removal of this requirement would constitute a revision to the permit which must be evaluated through submittal of an appropriate Class I application. No change to the permit is being made at this time.

NV Energy Comment No. 2 (Requirement to Derive lb-PM₁₀/ton-coal):

Condition VI.A.4.a.x.(2): The PM₁₀ emission limit for Reid Gardner Unit #1 (System 01) in the current Title V permit is 0.08 lb/MMBtu. The performance testing requirement requires PM₁₀ to be reported in lb/MMBtu (VI.A.4.a.ix.(1)). Therefore, NVE respectfully requests that NDEP remove the requirement to derive lb-PM₁₀/ton-coal.

Condition VI.B.4.a.x.(2): The PM₁₀ emission limit for Reid Gardner Unit #2 (System 02) in the current Title V permit is 0.08 lb/MMBtu. The performance testing requirement requires PM₁₀ to be reported in lb/MMBtu (VI.B.4.a.ix.(1)). Therefore, NVE respectfully requests that NDEP remove the requirement to derive lb-PM₁₀/ton-coal.

Condition VI.C.4.a.xi.(2): The PM₁₀ emission limit for Reid Gardner Unit #3 (System 03) in the current Title V permit is 0.08 lb/MMBtu. The performance testing requirement requires PM₁₀ to be reported in lb/MMBtu (VI.C.4.a.x.(1)). Therefore, NVE respectfully requests that NDEP remove the requirement to derive lb-PM₁₀/ton-coal.

Condition VI.D.4.a.xi.(2): The PM₁₀ emission limit for Reid Gardner Unit #4 (System 04) in the current Title V permit is 0.03 lb/MMBtu. The performance testing requirement requires PM₁₀ to be reported in lb/MMBtu (VI.D.4.a.x.). Therefore, NVE respectfully requests that NDEP remove the requirement to derive lb-PM₁₀/ton-coal.

BAPC Response to NV Energy Comment No. 2:

As described in NV Energy Comment No. 1, the requirement to derive lb-PM₁₀/ton-coal is a compliance demonstration requirement contained in the original Title V permit. This requirement cannot be removed from the permit without being evaluated under an application to revise the permit.

NV Energy Comment No. 3 (Use the Performance Test Value directly for lb/MMBtu):

Condition VI.A.4.c.v.: The performance testing requirement requires PM/PM₁₀ to be reported in lb/MMBtu (VI.A.4.a.ix.(1)). Therefore, NVE respectfully request that NDEP allow NVE to use the performance test value in lb/MMBtu directly and not recalculate it from lb-PM₁₀/ton-coal.

Condition VI.B.4.c.v.: The performance testing requirement requires PM/PM₁₀ to be reported in lb/MMBtu (VI.B.4.a.ix.(1)). Therefore, NVE respectfully request that NDEP allow NVE to use the performance test value in lb/MMBtu directly and not recalculate it from lb-PM₁₀/ton-coal.

Condition VI.C.4.c.v.: The performance testing requirement requires PM/PM₁₀ to be reported in lb/MMBtu (VI.C.4.a.x.). Therefore, NVE respectfully request that NDEP allow NVE to use the performance test value in lb/MMBtu directly and not recalculate it from lb-PM₁₀/ton-coal.

Condition VI.D.4.c.v.: The performance testing requirement requires PM/PM₁₀ to be reported in lb/MMBtu (VI.A.4.a.x.). Therefore, NVE respectfully request that NDEP allow

NVE to use the performance test value in lb/MMBtu directly and not recalculate it from lb-PM₁₀/ton-coal.

BAPC Response to NV Energy Comment No. 3:

NV Energy correctly notes that the annual Compliance/Performance Tests are required to be reported in lb/MMBtu for PM/PM₁₀. From these annual tests an emission factor is derived in Pounds of PM/PM₁₀ per ton of coal (lb-PM/tons-coal and lb-PM₁₀/tons-coal).

The permit requires that monitoring be performed continuously for quantity (in tons) of sub-bituminous and/or bituminous coal combusted. Additionally, the permit requires weekly sampling of the coal prior to it entering the boiler for gross calorific value.

The recordkeeping section of the permit requires the determination of the hourly heat input of the coal based on the data collected during monitoring. The hourly heat input is used with the derived emission factor to determine an hourly emission rate. The annual testing does not account for variability in the gross calorific value. Therefore, no change to the permit is being made at this time.

NV Energy Comment No. 4 (Clarify how to Report an Excursion):

Condition VI.A.4.d.iii: The language in this section does not clearly state how to report an excursion. Therefore, NVE respectfully requests that NDEP change the requirement to state “Report all excursions, in the same manner as deviations, as required in A.4.b.xiv. of this operating permit in accordance with the reporting requirements found in Section V.C. of this operating permit.”

Condition VI.B.4.d.iii: The language in this section does not clearly state how to report an excursion. Therefore, NVE respectfully requests that NDEP change the requirement to state “Report all excursions, in the same manner as deviations, as required in B.4.b.xiv. of this operating permit in accordance with the reporting requirements found in Section V.C. of this operating permit.”

Condition VI.C.4.d.iii: The language in this section does not clearly state how to report an excursion. Therefore, NVE respectfully requests that NDEP change the requirement to state “Report all excursions, in the same manner as deviations, as required in C.4.b.xiv. of this operating permit in accordance with the reporting requirements found in Section V.C. of this operating permit.”

Condition VI.D.4.d.iii: The language in this section does not clearly state how to report an excursion. Therefore, NVE respectfully requests that NDEP change the requirement to state “Report all excursions, in the same manner as deviations, as required in D.4.b.xv. of this operating permit in accordance with the reporting requirements found in Section V.C. of this operating permit.”

BAPC Response to NV Energy Comment No. 4:

Under 40 CFR §64.1, Compliance Assurance Monitoring (CAM) defines an “excursion” as a departure from an indicator range established for monitoring under this part, consistent with any averaging period specified for averaging the results of the monitoring. 40 CFR §64.9 requires that all excursions be reported as required under 40 CFR §70.6(a)(3)(iii).

Response to Comments provided at the June 12, 2012 Public Hearing

Verbal Comment No. 1:

“I'm an employee of NV Energy, Nevada Power, and I've been there for 30 years. I've been involved in work orders for the Title V program. Also in reliance reporting for that program. I feel confident that we're meeting the standards of the state and following those guidelines, and I would just like to make that known. Thank you.”

BAPC Response to Verbal Comment No. 1:

Thank you for your comment.

Verbal Comment No. 2:

“I think this will be the last -- if you allow the permit, it should be the last time because of issues involved with it, you know, the coal ash and, et cetera. Whatever the government said, the people are still getting poisoned up there. You should replace it with solar panels, you know what I'm saying? You should make enough solar panels to support half a million houses. We have Reid Gardner supports about 300,000 some odd houses. Eventually you're going to have a class action lawsuit going against you and you'll have to shut the whole plant down. You ought to figure out a way now to convert it over, bring in solar and cut the coal out. Because California got out of coal, and California is -- you know, they shut down the plant down in Arizona. They blew it down because coal is a pollutant. We all know this. And that's my comment. Thank you.”

BAPC Response to Verbal Comment No. 2:

Thank you for your comment.

Verbal Comment No. 3:

“My name is David Sharp. I'm compliance director at the Reid Gardner station. I'm speaking as a representative of NV Energy but also as a citizen who has worked in and around coal fired plants for around 35 years. I fully support the Title V renewal proposal as written, and I'm confident that our employees will continue to respond to whatever the permit conditions are and meet those limits. Thank you.”

BAPC Response to Verbal Comment No. 3:

Thank you for your comment.

Verbal Comment No. 4:

“My name is Josh Jensen. I'm just a contractor that works at Nevada Power, and I just want to say that I enjoy working there. I enjoy the people that work there and know a lot of the environmental people that work there and do a very good job. We love having the power

plant in operation and look forward to working there for a lot longer, if you guys will if Nevada Power is meeting their air quality requirements, then I don't see any reason why they shouldn't get a permit. Thank you.”

BAPC Response to Verbal Comment No. 4:

Thank you for your comment.

Verbal Comment No. 5:

“I've lived here in Overton for almost 15 years and watched the plant from when it was first put on there. That was before the scrubbers, before the baghouses. We've been downwind all that time. I haven't heard of anybody getting sick or anything else from this. We use the water out of the river, never have problems with any of the water. The air, we haven't had any problems with any of the air. So with Title V, the way they have it set up now, you don't even see any pollution or anything, so there's no reason why that shouldn't be renewed. Thank you.”

BAPC Response to Verbal Comment No. 5:

Thank you for your comment.

Verbal Comment No. 6:

“My name is Vaughan Evans. I've been working for Nevada Power for 31 years now. I've lived here in the valley for 31 years. I've been involved with the Title V for a number of years, keeping track of our quality and what we do at the plant. And we take it very seriously, keeping track of all the input, output for Title V. I get tired of people telling us we don't run clean at the power plant. We put on the updated baghouses, all the stuff that we were asked to do, and we run very clean as a power plant. I'm very proud to work there. I've lived in the valley and plan on staying in the valley after I retire, raise my kids here. And thank you very much.”

BAPC Response to Verbal Comment No. 6:

Thank you for your comment.

Verbal Comment No. 7:

“My name is Dan Baker. I've only been out here at Reid for about five years. I came out of aviation, an industry that is very meticulous in the operation of the equipment, fixing the equipment. With that background I came here to Reid. And in the last five years I have seen an outstanding amount of money spent in improving systems and improving equipment. And I have been one to write up many, many work orders, as I've seen in aviation. I'm kind of a perfectionist that way. As I've written these things up, as I've observed things that could be improved, there's been no hesitation to fix them. There's been no hesitation due to cost or any other restrictions. And I've seen the constant improvement, especially with the baghouses and so forth. I can't imagine what this place looked like 30 years ago, but I can

tell you that's it's a phenomenal place to be working at now and very clean. I do get upset when I see so many people come forward and talk about it being a dirty plant, but they don't have statistics, there's no numbers, there's no information to base statements like that off of. If they were to come out to the plant, see what's going on and see the improvement and get some fact information, I think many opinions would be changed. Thank you.”

BAPC Response to Verbal Comment No. 7:

Thank you for your comment.

Verbal Comment No. 8:

“I live here in Moapa Valley, work for a local contractor. We do a lot of work at the power plant and we support the renewal of their Title V permit. I've seen a lot of improvements myself and appreciate working out there. And I see that they put forth the effort that's needed and required of them and often go beyond what's required, and so I support this renewal.”

BAPC Response to Verbal Comment No. 8:

Thank you for your comment.

Conclusion

Based upon its review of and responses to comments provided by the public, U.S. EPA Region 9, and NV Energy, the BAPC is issuing the proposed revision/renewal of Class I Air Quality Operating Permit AP4911-0897 to Nevada Power Company.