



DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

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**FINAL ACTION REPORT PART 70 OPERATING PERMIT
RENEWAL AND REVISION
Nevada Power Company – Sunrise Station
Source: 8**

Public Notice: Review-Journal July 20, 2009.
Public Comment: July 20, 2009 to August 18, 2009

Comments Received:
Nevada Power Company (NPC)

Public Hearings: No public hearing was held.

Issuance date: October 20, 2009
Expiration date: October 19, 2014

DAQEM received comments from NPC. No comments were received from the EPA, the public, or any other agencies.

Copies of comments received and responses to those comments are part of this final action report. All responders shall receive an electronic copy of this report, the final Title V permit, and the final TSD.

**COMMENTS RECEIVED FROM NEVADA POWER COMPANY AND DAQEM
RESPONSE**

DAQEM received comments for the source on August 18, 2009 and the relevant parts of the comments are provided below:

NPC Comment 1:

1. **Cover Page:** NVE respectfully requests the following corrections to the Source Address and Responsible Official sections of the permit cover page:

SOURCE ADDRESS:

*6226 West Sahara Ave.,
Las Vegas, NV ~~89151~~ 89146*

RESPONSIBLE OFFICIAL:

*Name: Kevin Geraghty
Title: Vice President, Generation, ~~Nevada Power Company~~ NV Energy*

DAQEM Response: DAQEM accepts this change.

NPC Comment 2:

2. **Executive Summary:** For clarity, NVE respectfully requests that DAQEM revise the executive summary as follows by making the typographical edits that are also suggested below:
“The Sunrise Station, owned by Nevada Power Company (NPC)..... Hydrographic basin 212 is nonattainment for CO, PM₁₀, and ozone (8-hour), and ~~PSD~~-attainment for all other regulated air pollutants..... ”

DAQEM Response: DAQEM accepts this change.

NPC Comment 3:

3. **Condition II-C-3:** AQR Section 4.4 states that the information or analyses that will disclose the nature, extent, quantity or degree of air contaminants *may* be certified by a professional engineer registered in the State, if requested by DAQEM. However, Condition II-C-3 of the permit states that all such disclosures *are* certified by a professional engineer registered in the State. Therefore, NVE respectfully requests that Condition C.3. is revised as follows:

“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..... [AQR 4.4]”

DAQEM Response: DAQEM accepts this change.

NPC Comment 4:

Condition II-D-6: AQR Sections 19.4.1.3(c)(2)(a) and 25.2 require that upset, breakdown, or emergency conditions which cause excess emissions must be reported to the Control Officer within one hour of the onset of the event. Pursuant to AQR Section 19.4.1.3(c)(2), a deviation report must also be *promptly* submitted to the Control Officer, including the probable cause of deviations and any corrective actions or preventative measures taken. AQR Section 19.4.1.3(c)(1) requires *all* instances of deviations from the Part 70 permit requirements to be clearly identified in the quarterly reports. In accordance with AQR Section 19.4.1.3(c)(1), Condition III-F-3-c also requires that the quarterly reports shall include quarterly summaries of *any* permit deviations, their probable cause and corrective actions or preventative actions taken. In light of this and a presentation made by DAQEM personnel at a stakeholder meeting in January 2006 regarding deviation reporting, NVE understands that any deviation causing emissions in excess of permit limits should be reported within one hour, with a follow-up written report within ten days, and any other deviation should be reported in the quarterly report. Therefore, NVE respectfully requests that Condition II-D-6 be revised as follows for clarity purposes and consistency with relevant AQR sections:

“The Permittee shall promptly report to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) deviations specified in Condition II-D-7~~from permit requirements~~ as soon as practicable but not to exceed ten (10) calendar days of the deviation, including those attributable to upset conditions. Such reporting shall include the probable cause of such deviations and any corrective actions or preventative measures taken.”

DAQEM Response: DAQEM has updated the condition to state:

7. 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.
8. 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]

NPC Comment 5:

5. **Condition II-D-7-b:** AQR Section 25.2 does not require submittal of a detailed written report within 72 hours of the onset of the event. NVE is unfamiliar with this requirement or its source. Moreover, Condition II-C-6 requires all deviations to be reported in writing within ten (10) calendar days from discovery of the deviation. Therefore, NVE respectfully requests that Condition II-D-7-b be deleted from the permit.

DAQEM Response: DAQEM accepts this change.

NPC Comment 6:

Condition II-E-4: Condition II-E-4 requires that all requests for any alternative test methods must be submitted to EPA for approval. Pursuant to AQR 14.1 and 40 CFR 60.8(b), all requests requiring the use of alternative test methods that are not approved by EPA must be submitted to EPA for approval. However, DAQEM has the regulatory authority to approve the use of alternative test methods that are already approved by EPA but not specified in this permit. Therefore, NVE respectfully requests that Condition II-E-4 be revised as follows: *“The **Permittee Administrator shall provide all consider approving the Permittee’s requests for any alternative test methods to EPA for approval if proposed in writing in the performance test protocols.** [AQR 14.1 and 40 CFR 60.8(b)]”*

DAQEM Response: The Permittee has the responsibility to request EPA for approval of alternative test methods. DAQEM may approve the alternative test methods previously approved by EPA, if proposed in the performance test protocol. The revised condition is revised as follows:

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)]

NPC Comment 7:

Condition II-E-6: Pursuant to the AQR Section 10, the existing sources are required to prepare and submit compliance schedules if the source is not in compliance with an emission limitation hereinafter adopted. This section does not include specific reference to performance test results and preparation of compliance plans based on the results of the performance tests. Therefore, NVE respectfully requests that DAQEM revise Condition II-E-6 to be consistent with AQR Section 10.

DAQEM Response: DAQEM agrees and has revised the condition as follows (now Condition II-D-4).

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]

NPC Comment 8:

8. **Condition III-B-1-a:** No emission unit at the facility is subject to any “pounds per day” emission limit. Therefore, NVE respectfully requests that DAQEM revise Condition III-B-1-a as follows:

“Emission limitations in this permit refer to pounds per MMBtu, pounds per hour, ~~pounds per day~~ and tons per year.....”

DAQEM Response: DAQEM accepts this change.

NPC Comment 9:

9. **Conditions III-B-1-a, -b, -c, -f, -g, and -h:** The final ATC (Modification 1, Revision 4) for the Sunrise Station was issued on October 7, 2008. Condition II-2 of this permit states that this permit supersedes any ATC previously issued for this source. Therefore, NVE respectfully requests that DAQEM revise the origin for Conditions III-B-1-a, -b, -c, -f, -g, and -h as follows: “[NSR ATC 8, Modification 1, ~~Amendment 2~~ Revision 4 (06/30/200610/7/08)]”

DAQEM Response: DAQEM accepts these changes.

NPC Comment 10:

10. **Condition III-B-1-c:** Condition III-B-1-c is redundant with Condition III-B-1-h. Therefore, NVE respectfully requests DAQEM to delete Condition III-B-1-c.

DAQEM Response: DAQEM accepts this change.

NPC Comment 11:

11. **Condition III-B-1-d:** AQR Section 26 does not include any reference to Method 9 and only requires that the opacity shall not exceed an average of 20% for a period of more than 6 consecutive minutes.

Therefore, NVE respectfully requests that Condition III-B-1-d be revised as follows.

“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, as demonstrated by observations performed in accordance with EPA Method 9.”

DAQEM Response: DAQEM accepts this change.

NPC Comment 12:

12. **Tables III-B-1 and III-B-2:** The annual emission limits are included in Table III-B-1 for EU 801 and start-up and shutdown emissions are included in Table III-B-2. Therefore, NVE respectfully requests that DAQEM correct the references to these tables in footnote 1 of Tables III-B-1 and III-B-2 accordingly.

DAQEM Response: DAQEM corrected the footnotes. Additionally, Table III-B-1 was revised and divided it into Table III-B-1 and Table III-B-2. Consequently, numbering of Table III-B-2 has changed to Table III-B-3. The revised tables are presented below:

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

| EU | PM ₁₀ | NO _x | CO | SO _x | VOC |
|------------------|------------------|-----------------|--------|-----------------|-------|
| 801 ¹ | 45.99 | 1,760.23 | 155.31 | 10.41 | 10.87 |
| A02 ² | 0.01 | 0.15 | 0.03 | 0.01 | 0.01 |
| A03 ³ | 0.00 | 0.00 | 0.00 | 0.00 | 2.42 |

¹EU: 801 NO_x emissions based on maximum heat input rating of 1,182 MMBtu/hr; 8,760 hours of operation per year; and the May 24, 1990 NO_x Reduction Plan agreement with the Clark County Health District.

²EU: A02 emissions based on 380 hp; 26 hours per year testing and maintenance.

³EU: A03 VOC emissions from American Petroleum Institute Tanks Program.

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

| EU | PM ₁₀ | NO _x | CO | SO _x | VOC |
|-----|------------------|-----------------|------|-----------------|------|
| A02 | 0.84 | 11.78 | 2.54 | 0.78 | 0.96 |
| A03 | 0.00 | 0.00 | 0.00 | 0.00 | 0.55 |

a. The start-up and shut-down PTE listed in Table III-B-3 are not enforceable short term emission limitations. The Permittee shall use these emission factors for calculations of the start-up and shut-down emissions of turbine (EU: 801) for compliance with the annual emission limitations of the turbine. *[NSR ATC/OP 8, Modification 1, Revision 4, (10/07/08)]*

Table III-B-3: Turbine Start-up and Shut-down PTE ^{1,2}

| EU | PM ₁₀ | | NO _x | | CO | | SO _x | | VOC | |
|-----|------------------|--------|-----------------|--------|-----------|--------|-----------------|--------|-----------|--------|
| | lbs/MMBtu | lbs/hr | lbs/MMBtu | lbs/hr | lbs/MMBtu | lbs/hr | lbs/MMBtu | lbs/hr | lbs/MMBtu | lbs/hr |
| 801 | 0.0089 | 3.77 | 0.3800 | 174.90 | 0.37 | 107.7 | 0.0020 | 0.85 | 0.0021 | 0.89 |

¹ Annual emission limits for EU: 801 in Table III-B-1 include start-up and shut-down emissions shown in Table III-B-3. The EFs listed in Table III-B-3 will be used unless the source will develop more representative EFs.

² PTE represents emissions for one (1) hour of startup/shutdown.

NPC Comment 13:

13. **Condition III-B-2-c:** For clarity purposes, NVE respectfully requests that DAQEM revise the origin for Condition III-B-2-c as follows: "~~*[Authority: AQR 26.1 NSR ATC/OP 8, Modification 1, Revision 4 (10/07/08)]*~~"

DAQEM Response: DAQEM accepts this change.

NPC Comment 14:

14. Conditions III-C-1-a and III-F-3: Pursuant to Condition III-B-3-a of the Title V permit, NO_x emissions from EU 801 during gas firing must be controlled by using water injection for loads over 55 MW.

Therefore, the monitoring of water injection rate is also required for loads over 55 MW and the monitoring downtime is applicable only when water injection is required. Therefore, NVE respectfully requests that DAQEM revise Conditions III-C-1-a and III-F-3 as follows:

Condition III-C-1-a: *"The Permittee shall continuously monitor the natural gas fuel flow and water injection rate within the turbine This monitoring frequency requirement is not applicable during periods of monitor downtime including calibration, maintenance, and malfunction of the meter, with such downtime not to exceed (5) five percent of the total operating time during which water injection is required."*

Condition III-F-3: *"The Permittee shall submit the monitoring system performance report or summary report to the Control Officer, if the total downtime of the continuous operating system is five (5) percent or greater of the total operating time during which water injection is required, of the reporting period."*

DAQEM Response: DAQEM denies the change. The monitoring frequency requirement of 40 CFR 60.7(d)(2) specifically states that "monitor downtime including calibration, maintenance, and malfunction of the meter, with such downtime not to exceed (5) five percent of the total operating time". DAQEM concurs with NPC that at the loads below 55 MW there is no requirement for monitoring the water injection rate. However, permit conditions require monitoring the natural gas fuel flow rate during turbine operation regardless the load (Condition C-1-a):

- a. The Permittee shall continuously monitor the natural gas fuel flow and water injection rate within the turbine all times when the turbine is operating. (Continuous monitoring is defined as data recorded at least every fifteen (15) minutes with one hour average). This monitoring frequency requirement is not applicable during periods of monitor downtime including calibration, maintenance, and malfunction of the meter, with such downtime not to exceed (5) five percent of the total operating time. [AQR 19.4.1.3 and 40 CFR 60.7(d)(2)]

NPC Comment 15:

15. Conditions III-C-1-b and -c: Pursuant to 40 CFR § 64.2 (a)(2), the Compliance Assurance Monitoring (CAM) rule does not apply to EU 801 for CO emissions because the turbine does not use a control device to comply with any CO emission limit or standard. Therefore, NVE respectfully requests that DAQEM delete the reference to CO emissions from Conditions III-C-1-b and -c.

DAQEM Response: DAQEM accepts this change.

NPC Comment 16:

16. Table III-C-1:

- (a) Condition III-C-1-a provides useful details regarding the monitoring frequency. Therefore, NVE respectfully requests that DAQEM include reference to Condition III-C-1-a in the "Monitoring Frequency" section of Table III-C-1 as follows: ***"Refer to Condition III-C-1-a for additional details."***
- (b) For consistency with Condition III-C-1-a and clarity purposes, NVE respectfully requests that DAQEM revise footnote 1 as follows:
"Except during periods of startup, shutdown, calibration, maintenance/planned outage, or malfunction. Neither short term permit limits nor NO_x controls are applicable to turbine startup and shutdown periods. Per permit conditions, no NO_x emission control are required at loads of 55 MW or less; therefore, no NO_x emission controls are required during startup and shutdown. The startup and shutdown emissions are calculated using the NO_x emission factor listed in Table III-B-2 the permit and the measured fuel flow rate. As noted in the permit, the startup and shut down emission factors were derived from CEMS data at a sister unit at another source."

DAQEM Response: DAQEM accepts this change.

NPC Comment 17:

"For purpose of CAM, an exceedance of NO_x is deemed to occur if the data logging system records a three-hour average water injection rate lower than the optimum water injection rate or a performance test records a NO_x value result higher than the lb/MMBtu limit in Table III-B-1."

DAQEM Response: DAQEM accepts this change. The revised condition III-C-2 is presented below:

2. For purpose of CAM, an exceedance of NO_x is deemed to occur if the data logging system records a three-hour average water injection rate lower than the optimum water injection rate or performance test records a NO_x result higher than the 0.34 lb/MMBtu limit. [40 CFR 64.6(c)(2)]

NPC Comment 18:

18. **Condition III-C-6:** For clarity purposes, NVE respectfully requests that DAQEM restore the following statement at the end of this condition: ***"This does not, however, preclude the use of other credible evidence in determining or showing compliance."***

DAQEM Response: DAQEM accepts this change. The revised condition III-C-6 reads:

6. The Permittee shall use hourly and annual natural gas fuel consumption rates by the turbine (EU: 801); results of NO_x and CO performance testing; and information from the data logging system as a measure of compliance with the turbine's CO and NO_x annual emission limits. This does not, however, preclude the use of other credible evidence in determining or showing compliance. [AQR 19.4.1.3]

NPC Comment 19:

19. **Conditions III-F-5-b and -c:** Condition III-F-5-b is only required for emission units that are equipped with CEMS. Condition III-F-5-c is also not appropriate to this permit. Therefore, NVE respectfully requests that DAQEM delete Conditions III-F-5-b and -c from the permit.

DAQEM Response: DAQEM accepts this change.

NPC Comment 20:

20. **Conditions III-F-5-e and III-6-a:** Conditions III-F-5-e and III-6-a require that all required reports must be received by DAQEM on or before the due date to demonstrate compliance with the reporting *submittal* requirements of the permit. This condition specifies reporting requirements that are different the ATC (Mod 1 Rev 4) and from U.S. EPA’s policy regarding reporting deadlines and submittal requirements. Several Maximum Available Control Technology (MACT) standards and NSPS specify the postmark date, as noted by the mail carrier, as an adequate measure of demonstrating compliance with the reporting deadline. If a Permittee submits a report that is postmarked on or before the due date, then the Permittee is deemed to be in compliance with the reporting requirement. This is also consistent with U.S. EPA’s submittal guidelines specified in the Clean Air Act Q&A Database¹. Therefore, NV Energy respectfully requests that DAQEM revise Conditions III-F-5-e and III-6-a as follows:

Condition III-F-5-e: *“The report shall be ~~received by~~ submitted to DAQEM within 30 calendar days after the calendar quarter. Regardless of the date of issuance of this permit, the source shall comply with the schedule for report submissions outlined in Table III-F-1”*

Condition III-6-a: *“The annual emissions inventory shall be ~~received by~~ submitted to DAQEM no later than March 31 after the reporting year.”*

DAQEM Response: DAQEM accepts these changes. The Reporting Section F of the Part 70 OP has been revised and the conditions III-F-5-e and III-6-a have been removed. The new reporting deadlines are summarized in Table III-F-1. This table is presented in response to NPC Comment 21, below.

NPC Comment 21:

Table III-F-1: The annual emission inventory reports and annual compliance certifications are currently required to be submitted to DAQEM by March 31st and January 30th of each year, respectively. Therefore, NVE respectfully requests that DAQEM revise Table III-F-1 as follows:

Table III-F-1: Reporting Schedule

| Quarter | Applicable Period | Due Date ¹ | Required Contents |
|---------|-----------------------------|--|--|
| 4 | Calendar Year | <i>February 28 each</i> | Annual Emission Inventory Report |
| 1 | January, February, March | April 30 each year | Quarterly Report for 1 st Calendar Quarter |
| 2 | April, May, June | July 30 each year | Quarterly Report for 2 nd Calendar Quarter |
| — | Calendar Year | <i>30 days after permit issuance each year</i> | Annual Compliance Certification Report |
| 3 | July, August, September | October 30 each year | Quarterly Report for 3 rd Calendar Quarter |
| 4 | October, November, December | January 30 each year | Quarterly Report for 4 th Calendar Quarter and Annual Compliance Certification Report |
| 4 | Calendar Year | March 31 each year | Emissions Inventory Report |

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

DAQEM Response: DAQEM has updated the table to the following:

Table III-F-1: Reporting Schedule

| 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 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 |

NPC Comment 22:

22. **Condition III-F-7:** Condition III-F-7 is vague and redundant with Conditions II-D-7-a and III-F-8. Therefore, NVE respectfully requests DAQEM to delete Condition III-F-7.

DAQEM Response: DAQEM accepts this change.

NPC Comment 23:

23. Based on the comments above, NVE respectfully requests DAQEM to make corresponding revisions to relevant sections of the TSD. For the sake of conciseness, all these requested edits to the TSD are not discussed in this letter. In addition to the revisions based on comments above, NVE also requests DAQEM to make the following edits to the TSD:

(a) Page 2:

(1) For clarity purposes, NVE respectfully requests that DAQEM include major source emission thresholds in Table 1.

(2) NVE respectfully requests that DAQEM include reference to the final ATC (Modification 1, Revision 4), issued on October 7, 2008, in the last paragraph on Page 2.

(b) Page 4: NVE respectfully requests that DAQEM change the source contact on Page 4 to the following:

Contacts: ~~Dariusz Rekowski~~ Steve Page

Phone Number: (702) 402-~~5762~~-7706

(c) Page 5: For clarity purposes and consistency with the permit conditions, NVE respectfully requests that DAQEM revise the last paragraph in Section I.B. as follows:

"The NPC-Sunrise Station gas turbine (EU: 801) is continuously monitored for the natural gas flow, turbine load, and water injection rate as indicators of ~~NO_x concentration-emissions~~ in the flue gas. The monitoring system generates a log of data and provides alarm signals to the control room when the ~~level of emissions exceeds preselected limits~~ the 3-hour average water injection rate is less than the optimum water injection rate. The system complies with 40 CFR 64 Compliance Assurance Monitoring (CAM) Rule."

(d) Pages 5 and 9: NVE respectfully requests that DAQEM include reference to the final ATC (Modification 1, Revision 4), issued on October 7, 2008, in Section I.C. on Page 5 and Section II.A. on Page 9.

(e) Page 8: NVE respectfully requests that DAQEM revise the final paragraph in Section I-D as follows, "*...no more than 20 percent opacity for a period or periods aggregating more than ~~three six~~ consecutive minutes in any...*"

(f) Page 20: NVE respectfully requests that DAQEM revise the 40 CFR Part 64 applicability discussion as follows:

(f) Page 20: NVE respectfully requests that DAQEM revise the 40 CFR Part 64 applicability discussion as follows:

"The CAM Rule is applicable to the turbine (EU: 801) based on the applicability statement outlined in 40 CFR 64.2(a)(2), i.e., control device is used on this unit to achieve compliance with any emission limitation or standard for a regulated air pollutant. The CAM Rule is not applicable to this unit for ~~SO_x and CO~~ based on the applicability statement outlined in 40 CFR 64.2(a)(2)...."

(g) Page 20: NVE respectfully requests that DAQEM provide explanation that, although annual reports are specified in the ATC, the quarterly reporting requirement has been enhanced in the Title V permit to make annual reports redundant, and thus no longer required.

(h) Page 27: In accordance with AQR Section 26.1.1, NVE respectfully requests that DAQEM revise the AQR Section 26 requirements description for EU:A02 in Table IV.D. as follows:

"~~Less than twenty percent opacity except for three (3) minutes in any 60-minute period~~ Opacity not to exceed an average of 20 percent for a period of more than 6 consecutive minutes."

DAQEM Response: DAQEM accepts these changes.

In addition to the above changes DAQEM has also made the following changes to the Title V permit:

The following condition has been added (Condition III-C-9):

9. The Permittee shall perform at least one visual emissions observation on a plant-wide level each calendar quarter. Quarterly visual observations shall include the diesel-fired emergency generator (EU: A02) while operating, to demonstrate compliance with the opacity limit. If the diesel-fired emergency generator does not operate during the calendar quarter, then no observation shall be required. If visible emissions are observed, then corrective actions shall be taken to minimize the emissions and, if practicable, 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]*

All the corrections/changes mentioned in the comments above have been incorporated in the final Part 70 OP and TSD.

There were no other comments from the public or from EPA Region 9.