CLARK COUNTY
DEPARTMENT OF AIR QUALITY
4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118
Part 70 Operating Permit
Source: 329
Issued in accordance with the
Clark County Air Quality Regulations (AQR)

ISSUED TO: SWG Nevada Holdings, LLC

SOURCE LOCATION:
1701 East Alexander Road
North Las Vegas, NV 89030
T20S, R61E, Section 11
Hydrographic Basin Number: 212

COMPANY ADDRESS:
1701 East Alexander Road
North Las Vegas, NV 89030

NATURE OF BUSINESS:
SIC Code 4931: Electric Cogeneration
NAICS Code 221112: Fossil Fuel Electric Power Generation

RESPONSIBLE OFFICIAL:

Name:	Randy Fox
Title:	Director of Environmental Services and Safety
Phone:	(303) 623-3013
Fax Number:	(702) 642-8738

Permit Issuance Date: **May 14, 2012** **Expiration Date: May 13, 2017**
Minor Permit Revision: **July 25, 2013**

ISSUED BY: CLARK COUNTY DEPARTMENT OF AIR QUALITY

L. Wallenmeyer

Lewis Wallenmeyer
Control Officer, Clark County Department of Air Quality

EXECUTIVE SUMMARY

SWG Nevada Holdings, LLC (SWG NV) is a synthetic minor source for PM_{10} and NO_X, and a minor source for CO, SO_x, VOC, and HAP. The source is also identified as a major source for greenhouse gases (GHG). The source is under SIC 4931: Electric Cogeneration (NAICS 221112: Fossil Fuel Electric Power Generation) and is located at 1701 East Alexander Road in North Las Vegas, Nevada, in the Las Vegas Valley airshed, hydrographic basin 212 (T20S, R61E, Section 11). Hydrographic basin 212 is nonattainment for PM_{10} and ozone, and attainment for all other regulated air pollutants.

SWG NV operates five Turbine Generator Packages with GE LM-6000 stationary combustion turbines, one with a heat recovery steam generator (HRSG) and four with once-through steam generators (OTSG). There is no supplemental firing (no duct burners). There is also a steam turbine, two auxiliary boilers, two cooling towers, a fire pump, a diesel emergency generator, and an ammonia storage tank. There are no emissions associated with the HRSG, OTSG, or the steam turbine itself.

Based on an application submitted on February 11, 2013, the Part 70 Operating Permit (OP) is revised to update the operating parameters of two cooling towers (EUs: A02 and A07).

The following table summarizes the source PTE for each regulated air pollutant for all emission units addressed by this Part 70 OP:

Source-wide PTE (tons per year)[1]

Pollutants	PM_{10}	$PM_{2.5}$	NO_x	CO	SO_x	VOC	HAP	GHG/CO_2e
PTE Totals	**55.23**	**46.02**	**96.28**	**51.81**	**5.52**	**35.72**	**4.93**	**1,231,027**
Major Source Thresholds	**70**	**250**	**100**	**100**	**100**	**100**	**25/10[2]**	**250/100,000**

[1] Not a source-wide emission limit; values are used for determining the major source status.
[2] 25 tons for combination of all HAPs (no single HAP exceeds 10 tons).

Pursuant to AQR 12.5.2, all terms and conditions in Sections I through VII and Attachments 1 and 2 in this permit are federally enforceable unless explicitly denoted otherwise.

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I. ACRONYMS

Table I-1: List of 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
DAQ	Clark County Department of Air Quality
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
$PM_{2.5}$	Particulate Matter less than 2.5 microns
ppm	Parts per Million
ppmvd	Parts per Million, Volumetric Dry
PTE	Potential to Emit
QA/QC	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 conditions of the Part 70 Operating Permit. Any permit noncompliance may constitute a violation of the AQRs, Nevada Law, and the Clean Air Act (Act), and is grounds for the following: enforcement action; permit termination, revocation and reissuance; revision; or denial of a permit renewal application. *[AQR 12.5.2.6(g)(1)]*
2. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall not be affected and shall remain valid. *[AQR 12.5.2.6(f)]*
3. The Permittee shall pay all permit fees pursuant to AQR Section 18. *[AQR 12.5.2.6(h)]*
4. The permit does not convey any property rights of any sort, or any exclusive privilege. *[AQR 12.5.2.6(g)(4)]*
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 5.1.1]*
6. 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. In addition, the Permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date it filed a complete application but prior to release of a draft permit. A responsible official shall certify the additional information consistent with the requirements of AQR Section 12.5.2.4. *[AQR 12.5.2.2]*
7. The Permittee who has been issued a permit under Section 12.5 shall post such permit in a location which is clearly visible and accessible to the facility's employees and representatives of the department. *[AQR 12.5.2.6(m)]*
8. The Permittee shall allow the Control Officer upon presentation of credentials: *[AQR 4.3 and AQR 12.5.2.8(b)]*
    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.

B. Modification, Revision, Renewal Requirements

1. No person shall begin actual construction of a New Part 70 source, or modify or reconstruct an existing Part 70 source that falls within the preconstruction review applicability criteria, without first obtaining an Authority to Construct Permit from the Control Officer. *[AQR 12.4.1.1(a)]*

2. The permit may be revised, revoked, reopened and reissued, or terminated for cause. The filing of a request by the Permittee for the permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *[AQR 12.5.2.6(g)(3)]*

3. A permit, permit revision, or renewal may be approved only if all of the following conditions have been met: *[AQR 12.5.2.10(a)]*

   a. The Permittee has submitted to the Control Officer a complete application for a permit, permit revision, or permit renewal, except that a complete application need not be received before a Part 70 general permit is issued pursuant to Section 12.5.2.20; and

   b. The conditions of the permit provide for compliance with all applicable requirements and the requirements of Section 12.5.

4. The Permittee shall not build, erect, install or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere reduces or conceals an emission, which would otherwise constitute a violation of an applicable requirement. *[AQR 80.1]*

5. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading or other similar programs or processes for changes that are provided for in the permit. *[AQR 12.5.2.6(i)]*

6. For purposes of permit renewal, the Permittee shall submit a timely and complete application that is submitted at least six (6) months and not greater than eighteen (18) months prior to the date of permit expiration. If a source submits a timely application under this provision, it may continue operating under its current Part 70 Operating Permit until final action is taken on its application for a renewed Part 70 Operating Permit. *[AQR 12.5.2.1(a)(2)]*

7. Permit expiration terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted. *[AQR 12.5.2.11(b)]*

C. Reporting/Notifications/Providing Information Requirements

1. The Permittee shall submit all reports to the Control Officer. *[AQR 12.5.2.8(e)(4)]*

2. Any application form, report, or compliance certification submitted pursuant to the permit or AQRs shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under AQR 12.5 shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *[AQR 12.5.2.6(l)]*

3. 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 revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Control Officer copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the Administrator along with a claim of confidentiality. *[AQR 12.5.2.6(g)(5)]*

4. 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]*

5. The Permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1]*

   a. The annual emissions inventory must be submitted to Air Quality by March 31 of each calendar year; and

   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.

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 12.5.2.6(g)(2)]*

2. Any person who violates any provision of the AQR, 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 Air Quality 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 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(b)(8)]*

5. The Permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W Russell Road, Ste 200, Las Vegas, NV 89118) and the Administrator at USEPA Region IX (Director, Air and Toxics Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each year will be due on January 30th of the following year and shall include the following: *[AQR 12.5.2.8(e)]*

   a. The identification of each term or condition of the permit that is the basis of the certification;

   b. The identification of the methods or other means used by the Permittee for determining the compliance status with each term and condition during the certification period. The methods and means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements described in 40 CFR 70.6(a)(3). If necessary, the Permittee shall also identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information; and

c. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means designated in subsection II.D.5(b). The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify, as possible exceptions to compliance, any periods during which compliance is required and in which an excursion or exceedance, as defined under 40 CFR Part 64, occurred.

6. The Permittee shall report to the Control Officer (4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118) 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 12.5.2.6(d)(4)(B) and AQR 25.6.1]*
   a. within twenty-four (24) hours of the time the Permittee learns of the excess emissions, a notification shall be provided by phone (702) 455-5942, fax (702) 383-9994, or email: airquality@clarkcountynv.gov
   b. within seventy-two (72) hours of the notification required by paragraph (a) above, a detailed written report, certified by a responsible official, containing the information required by AQR Section 25.6.3 shall be submitted.
7. The Permittee shall report to the Control Officer with the semi-annual monitoring report all deviations from permit conditions that do not result in excess emissions, including those attributable to malfunction, startup, or shutdown. Reports shall identify the probable cause of each deviation and any corrective actions or preventative measures taken. *[AQR 12.5.2.6(d)(4)(B)]*
8. The owner or operator of any source required to obtain a permit under Section 12 shall report to the Control Officer emissions that are in excess of an applicable requirement or emission limit that pose a potential imminent and substantial danger to public health, safety or the environment as soon as possible, but in no case later than twelve (12) hours after the excess emissions is discovered, with a written report submitted within two (2) days of the occurrence. *[AQR 25.6.2]*

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 Air Quality 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. *[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 (4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118) not less than 45 nor more than 90 days prior to the anticipated date of the performance test, unless an alternate timeline is approved by the Control Officer. *[AQR 12.5.2.8]*

4. The Permittee shall submit to EPA for approval any alternative test methods that are not already approved by EPA, to demonstrate compliance with a requirement under 40 CFR Part 60. *[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 12.5.2.8]*

III. EMISSION UNITS AND APPLICABLE REQUIREMENTS

A. Emission Units

1. The stationary source covered by this Part 70 OP consists of the emission units and associated appurtenances summarized in Table III-A-1. *[AQR 12.5.2.3]*

Table III-A-1: List of Emission Units

EU	Description	Rating	Make	Model No.	Serial No.
A01	Turbine Generator Package Unit 1, Natural Gas-fired; SCR and *O***x**idation Catalyst	480 MMBtu/hr; 44 MW	General Electric	LM-6000	260245
A02	Two-cell mechanical draft cooling tower, 3,000 ppm TDS, 0.005% drift loss	14,200 gpm	GEA	TD-363-2-2422CF	N/A
A03	Turbine Generator Package Unit 2, Natural Gas-fired; SCR and Oxidation Catalyst	480 MMBtu/hr; 44 MW	General Electric	LM-6000	310891
A04	Turbine Generator Package Unit 3, Natural Gas-fired; SCR and Oxidation Catalyst	480 MMBtu/hr; 44 MW	General Electric	LM-6000	311668
A05	Turbine Generator Package Unit 4, Natural Gas-fired; SCR and Oxidation Catalyst	480 MMBtu/hr; 44 MW	General Electric	LM-6000	311724
A06	Turbine Generator Package Unit 5, Natural Gas-fired; SCR and Oxidation Catalyst	480 MMBtu/hr; 44 MW	General Electric	LM-6000	312189
A07	10-cell mechanical draft cooling tower, 3,000 ppm TDS, 0.001% drift loss	78,248 gpm	GEA	363028-10I-22-WCF	N/A
B01	Hot Water Boiler	13.39 MMBtu/hr	Volcano	BF-400L	656-E
B02	Hot Water Boiler	13.39 MMBtu/hr	Volcano	BF-400L	657-E
C01	Diesel Fire Pump DOM: 1996	121 hp	Caterpillar	3208	90N74714
D01	Emergency Diesel Generator DOM: 1996	163 hp	Generac	95A00971S	2019062

B. Emission Limitations and Standards

1. Emission Limits

a. The Permittee shall not allow the actual emissions from each emission unit to exceed the calculated PTE listed in Table III-B-1 during any consecutive 12 months. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

b. The Permittee shall not allow the actual CO emissions for any one-hour averaging period as determined by the CEMS, excluding any start-up or shut-down periods as defined, to exceed the hourly emission limits for Turbine Generation Packages 1 through 5 (EUs: A01 and A03 through A06) in Table III-B-2. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

c. The Permittee shall not allow the actual NO_X emissions for any three-hour averaging period as determined by the CEMS, excluding any start-up or shut-down periods as defined, to exceed the hourly emission limits for Turbine Generation Packages 1 through 5 (EUs: A01 and A03 through A06) in Table III-B-2. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

d. The Permittee shall operate Turbine Generation Packages 1 through 5 (EUs: A01 and A03 through A06) not to emit more than the listed emission limits for NO_X or CO, excluding any start-up and shut-down as defined in Table III-B-1 and Table III-B-2. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

Table III-B-1: Emission Unit PTE, Including Startup and Shutdowns (tons per year)[1]

EU	PM_{10}	$PM_{2.5}$	NO_x	CO	SO_x	VOC	HAP
A01	7.70	7.70	48.00	22.00	0.80	5.00	1.09
A02	4.38	0.00	0.00	0.00	0.00	0.00	0.00
A03	9.52	9.52	11.43	6.96	1.14	7.62	0.95
A04	9.52	9.52	11.43	6.96	1.14	7.62	0.95
A05	9.52	9.52	11.43	6.96	1.14	7.62	0.95
A06	9.52	9.52	11.43	6.96	1.14	7.62	0.95
A07	4.83	0.00	0.00	0.00	0.00	0.00	0.00
B01	0.04	0.04	0.18	0.75	0.01	0.03	0.01
B02	0.04	0.04	0.18	0.75	0.01	0.03	0.01
C01	0.07	0.07	0.94	0.20	0.06	0.08	0.01
D01	0.09	0.09	1.26	0.27	0.08	0.10	0.01

[1] Annual limits for turbines are based upon 66 °F. Annual start-up and shut-down emissions are included.

Table III-B-2: Emission Unit PTE, Excluding Startup and Shutdowns (lbs/hr)[1]

EU	PM_{10}[2]	$PM_{2.5}$[2]	NO_x[3]	CO[2]	SO_x[2]	VOC[2]	HAP[2]
A01	3.00	3.00	14.00	9.00	0.30	2.00	0.24
A03	2.50	2.50	3.15	1.92	0.30	2.00	0.24
A04	2.50	2.50	3.15	1.92	0.30	2.00	0.24
A05	2.50	2.50	3.15	1.92	0.30	2.00	0.24
A06	2.50	2.50	3.15	1.92	0.30	2.00	0.24
B01	0.10	0.10	0.50	2.52	0.01	0.07	0.03
B02	0.10	0.10	0.50	2.52	0.01	0.07	0.03

[1] Hourly limits are based on 36 °F.
[2] Limits for PM_{10}, $PM_{2.5}$, CO, SO_x, VOC, and HAP are for any one-hour averaging period.
[3] Limit for NO_x is for any three-hour averaging period.

e. The Permittee shall operate Turbine Generation Packages 1 through 5 (EUs: A01 and A03 through A06) not to emit more than the listed emission limits for NO_X or CO, as defined in Table III-B-3, excluding any start-up and shut-down. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

Table III-B-3: Enforceable Emissions Limitations (ppmvd), Excluding Startup and Shutdowns

EU	Description	NO_X[3]	CO[4]
A01[1]	Unit 1 w/ SCR	10	10
A03[1]	Unit 2 w/ SCR	2.0	2.0
A04[1]	Unit 3 w/ SCR	2.0	2.0
A05[1]	Unit 4 w/ SCR	2.0	2.0
A06[1]	Unit 5 w/ SCR	2.0	2.0
B01[2]	IBW Boiler w/ DLN	30	250

EU	Description	NO_X[3]	CO[4]
B02[2]	IBW Boiler w/ DLN	30	250

[1] Limitations in ppmvd @ 15 percent O_2.
[2] Limitations in ppmvd @ 3 percent O_2 .
[3] Limit for NO_x is for any three-hour averaging period.
[4] Limit for CO is for any one-hour averaging period.

f. The Permittee shall operate the boilers (EUs: B01 and B02) not to emit more than 30 ppm NO_X or 250 ppm CO. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

g. 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, when viewed in accordance with EPA Method 9. *[AQR 26.1.1]*

2. Operational Limitations

a. The Permittee shall limit the operation of Turbine Generation Packages 2 through 4 (EUs: A03 through A06) to 30,480 hours per any consecutive 12 months cumulatively. *[AQR 12.5.2]*

b. The Permittee shall include startup and shutdown emissions, as recorded by the continuous emission monitoring system (CEMS) for NO_x and CO in all consecutive 12 months emission totals. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

c. The Permittee shall limit the heat input of each of the Turbine Generation Packages (EUs: A01 and A03 through A06) to 480 MMBtu/hr based on the HHV of natural gas, corrected to standard conditions. *[AQR 12.5.2]*

d. The Permittee shall limit total annual startup/shutdown cycles for Turbine Generation Packages 2 through 5 (EUs: A03 through A06) to 792 occurrences per unit in any consecutive 12 months. Each start-up cycle shall constitute one occurrence and each shut-down cycle will constitute one occurrence. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

e. Startup shall consist of the first 120 minutes of operation. The period will begin with first fire on fuel and will continue for 120 consecutive minutes. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

f. A shutdown is defined as the one-hour period immediately preceding the cessation of firing of the gas turbine. A shutdown shall not exceed 60 consecutive minutes. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

g. The Permittee shall limit operation of each boiler (EUs: B01 and B02) to 700 hours per any consecutive 12 months. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

h. The Permittee shall limit operation of the diesel fire pump (EU: C01) for testing and maintenance purposes to 100 hours per year. The Permittee may operate the fire pump up to 50 hours per year for non-emergency situations, but those hours count towards the 100 hours provided for testing and maintenance. *[40 CFR 63.6640(f)]*

i. The Permittee shall limit operation of the emergency generator (EU: D01) for testing and maintenance purposes to 100 hours per year. The Permittee may operate the emergency generator up to 50 hours per year for non-emergency situations, but those hours count towards the 100 hours provided for testing and maintenance. The 50 hours per year for non-emergency situations cannot be used for peak shavings or to generate income for the facility. *[40 CFR 63.6640(f)]*

j. The Permittee shall limit maximum water flow of the cooling tower (EU: A02) to 14,200 gallons per minute. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

k. The Permittee shall limit maximum water flow of the GEA cooling tower (EU: A07) to 78,248 gallons per minute. *[Minor Title V Revision (00329_20130213_APP) incorporated into the Title V]*

3. Emission Controls

a. The Permittee shall, under all conditions, operate the source in a manner consistent with good air pollution control practice for minimizing emissions as required by 40 CFR 60.11.

b. The Permittee shall maintain and operate the SCRs on all five turbine units (EUs: A01 and A03 through A06) in accordance with manufacturer's specifications. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

c. The Permittee shall operate the SCR at all times the associated turbine unit is operating, excluding startup and shutdown. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

d. The Permittee shall operate the SCR such that the NO_X emissions do not exceed the limitations listed in Tables III-B-1 and III-B-2. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

e. The Permittee shall maintain and operate the CO oxidation catalyst in the five turbine units (EUs: A01 and A03 through A06) in accordance with manufacturer's specifications. The oxidation catalysts shall be operated at all times the associated turbine unit is operating, excluding startup and shutdown. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

f. The Permittee shall operate and maintain a water injection system on Turbine Generation Packages 1 through 5 (EUs: A01 and A03 through A06). The water injection system shall be operated in accordance with the manufacturer's specifications and good operating practice. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

g. The Permittee shall control SO_x exhaust emissions from each stationary gas turbine (EUs: A01 and A03 through A06) and the two 13.39 MMBtu/hr boilers (EU: B01 and B02) by the exclusive use of pipeline quality natural gas as defined by the Federal Energy Regulatory Commission (0.75 grains/100 dscf of sulfur) and good combustion practice. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

h. The Permittee shall control PM_{10} exhaust emissions from each stationary gas turbine by properly maintaining the inlet air filters preceding each turbine as recommended by the manufacturer and good operating practice (EUs: A01 and A03 through A06). *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

i. The Permittee shall operate the Volcano 13.39 MMBtu/hr boilers with low-NO_x burners (EUs: B01 and B02). *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

j. The Permittee shall operate the diesel fire pump and the emergency generator with turbochargers and aftercoolers (EUs: C01 and D01). *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

k. The Permittee shall operate and maintain the diesel emergency generator and the diesel fire pump in accordance with the manufacturer's specifications. *[AQR 12.1.4.1(c)&(f)]*

l. The Permittee shall combust only low sulfur diesel fuel, defined as less than 0.05 percent sulfur by weight, in the fire pump and emergency generator (EUs: C01 and D01). *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

m. The Permittee shall maintain the GEA cooling tower drift rate at or below 0.005 percent of the circulating water flow rate (EU: A02). *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

n. The Permittee shall maintain total dissolved solids (TDS) concentration in the cooling tower process water at or below 6,000 ppm (based on a 30-day average) (EU: A02). *[Minor Title V Revision (00329_20130213_APP) incorporated into the Title V]*

o. The Permittee shall maintain the GEA cooling tower drift rate at or below 0.001 percent of the circulating water flow rate (EU: A07). *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

p. The Permittee shall maintain total dissolved solids (TDS) concentration in the cooling tower process water at or below 6,000 ppm (based on a 30-day average) (EU: A07). *[Minor Title V Revision (00329_20130213_APP) incorporated into the Title V]*

q. The Permittee shall maintain and operate all cooling towers per manufacturer's specifications. No chromium-containing compounds shall be used in the cooling tower process water. *[40 CFR 63.402]*

C. Monitoring

1. To demonstrate continuous, direct compliance with the emission limitations for NO_X and CO, the Permittee shall install, calibrate, maintain, operate, and certify CEMS on Units 1 through 5 (EUs: A01 and A03 through A06). The system shall include an automated data acquisition and handling system. The CEMS shall monitor and record at least the following data in addition to meeting the requirements of 40 CFR 60 Subpart GG and 40 CFR 75: *[AQR 12.5.2.6(d) and 40 CFR 75]*

    a. hours of operation;

    b. electrical load;

    c. fuel consumption and type;

    d. water injection rate;

    e. exhaust gas flow rate (by direct or indirect methods);

    f. exhaust gas concentration of NO_X, CO and O_2;

    g. one-hour average CO concentrations;

    h. three-hour average NO_X concentration;

    i. the mass flow rate of NO_X and CO;

    j. daily and quarterly accumulated mass emissions of NO_X and CO; and

    k. hours of downtime for CEMS.

2. CEMS for Units 1 through 5 (EU: A01 and A03 through A06) shall be initially certified and tested pursuant to 40 CFR 75, Appendix A: CEMS Specifications and Test Procedures and 40 CFR 60 Appendices B and F. Subsequent CEMS certifications for Units 1 through 5 must be conducted with representative sampling of the stack. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

3. CEMS certification and recertification procedures shall be met as required in 40 CFR 75.20 for Units 1 through 5 (EUs: A01 and A03 through A06). *[40 CFR 75.20]*

4. CEMS QA/QC procedures shall conform to the provisions of 40 CFR 75 Appendix B for Units 1 through 5 (EUs: A01 and A03 through A06). *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

5. Any exceedance of the hourly or annual NO_X and/or CO emission limitations as determined by the CEMS shall be considered a violation of the emission limit imposed and may result in enforcement action. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

6. The Permittee shall conduct RATA of the NO_X, CO, and O_2 CEMS at least annually. The Permittee shall follow 40 CFR 75, Appendix B as it pertains to RATA testing. *[AQR 12.5.2.6(d)]*

7. The Permittee has installed Method 1 multipoint CEMS probes to meet requirements of 40 CFR 60 Appendix B. As long as multipoint probes are installed and maintained according to manufacturer instructions, no stratification is assumed and the stratification testing is not required (EUs: A03 through A06). *[AQR 12.5.2.6(d)]*

8. Required periodic audit procedures shall conform to the provisions of 40 CFR 60 Appendix F and 40 CFR 75 Appendix B. For linearity and RATA testing schedules and linearity ranges the Permittee shall follow 40 CRF 75 Appendix B. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

9. The Permittee shall comply with an approved quality assurance plan for CEMS. The quality assurance plan which was approved by DAQ on April 24, 2006, is in compliance with 40 CFR Part 60 Appendix F – Quality Assurance Procedures, and contain auditing schedules, reporting schedules, and design specifications for the CEMS system. *[NSR ATC Modification 3, Revision 5, (05/20/09)]*

10. The Permittee shall monitor emissions of NH_3 by use of an NH_3 parametric emission monitoring system (PEMS) based on ammonia flow rate to the SCR and NO_x emissions monitoring. *[AQR 12.5.2.6(d)]*

11. The equation used for NH_3 PEMS shall only be modified if indicated by the RATA test results. If the equation used for NH_3 PEMS is changed without indication from the RATA test results, then a new RATA test may be required by the Control Officer. *[AQR 12.5.2.6(d)]*

12. The Permittee shall monitor monthly occurrences and duration of startup/shutdown cycles for Units 2 through 5 (EUs: A03 through A06). *[AQR 12.5.2.6(d)]*

13. The Permittee shall perform visual emissions checks each calendar quarter on a plant-wide level. The quarterly visual checks shall include the diesel-fired emergency generators and fire pump (EUs: C01 and D01) 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 12.5.2.6(d) and 40 CFR 70.6]*

14. The Permittee shall monitor monthly operating hours of each boiler (EUs: B01 and B02). *[AQR 12.5.2.6(d)]*

15. The Permittee shall operate each diesel engine (EUs: C01 and D01) with a non-resettable hour meter and monitor the duration of operation for testing and maintenance, and separately for emergencies. *[AQR 12.5.2.6(d)]*

16. During periods of cooling towers operation, the Permittee shall monitor TDS in the tower circulating water at least monthly. *[AQR 12.5.2.6(d)]*

17. The Permittee shall use a conductivity method, or an equivalent method approved in advance by the Control Officer, to monitor TDS. *[AQR 12.5.2.6(d)]*

18. The Permittee shall verify the natural gas sulfur content at least annually and verifications shall be based on reports or written data from the gas supplier or by sampling and analysis. *[AQR 12.5.2.6(d)]*

19. Sulfur content of diesel fuel shall be certified by the supplier with each fuel delivery. *[AQR 12.5.2.6(d)]*

D. Testing

1. Performance testing is subject to 40 CFR 60, Subpart A, Dc and GG; 40 CFR 72; 40 CFR 75, Title IV-Acid Rain Regulations; and the Air Quality Guidelines on Performance Testing. *[AQR 12.5.2.6(d) and 40 CFR 60.335]*

2. The Permittee shall conduct performance tests for NO_x and CO on each of the turbine package units (EUs: A01 and A03 through A06) to demonstrate compliance with the emission limitations. Table III-D-1 summarizes NO_X and CO performance test methods for turbine package units. *[AQR 12.5.2.6(d)]*

Table III-D-1: Performance Testing Requirements for Turbine Package Units

Test Point	Pollutant	Method
Turbine/HRSG/OTSG Exhaust Outlet Stack	NO_X	Chemiluminescence Analyzer (EPA Method 7E)
Turbine/HRSG/OTSG Exhaust Outlet Stack	CO	EPA Method 10
Stack Gas Parameters	---	EPA Methods, 1, 2, 3 or 3A, 4, or Method 19

3. The Permittee shall conduct subsequent performance tests for NO_x and CO on all turbine units within five years of the previous complying test. *[AQR 12.5.2.6(d)]*

4. For compliance demonstration of performance testing requirements the Permittee may use results from stack testing performed during the Relative Accuracy Test Audit (RATA) provided the RATA testing meets the requirements specified in 40 CFR 60.335 *[40 CFR 60.335(b)(7)(i-iii)]*

5. The Permittee shall report the performance testing results as concentrations and mass emission rates and the results must be reported separately from the RATA results.

6. The Permittee shall perform a burner efficiency test once each calendar year on each of the two 13.39 MMBtu/hr boilers (EUs: B01 and B02). *[AQR 12.5.2.6(d)]*

7. The Permittee shall conduct performance tests for NO_x and CO on each of the two 13.39 MMBtu/hr Volcano boilers (EUs: B01 and B02) within five years of the date previous the previous complying test. Performance testing shall demonstrate compliance with the emission limitations of NO_x and CO. Table III-D-2 summarizes performance test methods for the boilers. *[AQR 12.5.2.6(d)]*

Table III-D-2: Performance Testing Requirements for Boilers

Test Point	Pollutant	Method
Boiler Exhaust Outlet Stack	NO_X	Chemiluminescence Analyzer (EPA Method 7E)
Boiler Exhaust Outlet Stack	CO	EPA Method 10 analyzer
Stack Gas Parameters	-	EPA Methods 1, 2, 3 or 3A, 4, or Method 19

E. Record Keeping

1. The Permittee shall maintain records on site that require semi-annual reporting and include, at a minimum: *[AQR 12.5.2.6(d)]*

    a. the magnitude and duration of excess emissions, permit deviations, notifications, monitoring system performance, malfunctions, and corrective actions taken, as required by 40 CFR 60.7:

Turbine Packages (EUs: A01 and A03 through A06):

    b. monthly and rolling 12-month total hours of operation for each turbine including start-up and shut-down cycles;

    c. monthly and rolling 12-month total quantities of natural gas consumed in each stationary gas turbine;

    d. CEMS audit results, accuracy checks, corrective actions, etc., as required by 40 CFR 60, Appendix F, and the CEMS Quality Assurance Plan;

    e. quarterly CEMS summary of NO_X and CO emissions;

    f. dates and description of maintenance on each turbine package, including serial numbers when turbine is exchanged with spare turbine;

    g. updated emission information for spare turbine(s) placed into service;

Boilers (EUs: B01 and B02):

    h. monthly and rolling 12-month total hours of operation of each boiler;

    i. monthly and rolling 12-month total quantities of natural gas consumed in boilers;

IC Engines (EUs: C01 and D01):

    j. date and duration of each operation and total hours of operation for each reporting period of diesel engines for testing and maintenance, and separately for emergencies; and

Cooling Towers (EUs: A02 and A07):

    k. monthly TDS test results of the cooling towers.

2. The Permittee shall maintain records on site that include, at a minimum: *[AQR 12.5.2.6(d)]*

    a. sulfur content of natural gas;

    b. sulfur content of diesel fuel as certified by the supplier with each fuel delivery;

    c. log of visual emissions checks;

    d. Certificates of Representation for the designated representative and the alternate designated representative that meet all requirements of 40 CFR 72.24;

    e. copies of all records, reports, compliance certifications, and submissions made or required under the Acid Rain Program;

    f. copies of all documents used to complete an Acid Rain Permit application and any other submission under the Acid Rain Program to demonstrate compliance with the requirements of the Acid Rain Program;

    g. all CEMS and/or PEMS information required by the CEMS and/or PEMS monitoring plan as specified in 40 CFR 75 Subpart F;

    h. manufacturer's operation specifications for SCR and Oxidation Catalyst controls;

i. quality assurance plan approved by the Control Officer. The quality assurance plan shall contain auditing schedules, reporting schedules, and design specifications for the CEMS. The CEMS shall conform to the provisions of 40 CFR 60 Subpart GG and 40 CFR 75;

j. results of burner efficiency test for boilers; and

k. performance testing results.

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 applicable). *[AQR 12.5.2.6(d)]*

4. 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 DAQ upon request. *[AQR 12.5.2.6(d)]*

5. The Control Officer reserves the right to require additional requirements concerning records and record keeping for this source. *[AQR 12.5.2.6(d)]*

F. Reporting

1. The Permittee shall comply with all applicable notifications and reporting requirements of 40 CFR 60.7, 40 CFR Subparts Dc and GG, 40 CFR 72.9, and 40 CFR 75. *[AQR 12.5.2.6(d)]*

2. The Permittee shall submit semi-annual reports to the Control Officer. *[AQR 12.5.2.6(d)]*

3. The following requirements apply to semi-annual reports: *[AQR 12.5.2.6(d)]*

   a. The report shall include a semi-annual summary of each item listed in Section III-E-1.

   b. The report shall include semi-annual summaries of any permit deviations, their probable cause, and corrective or preventative actions taken.

   c. The report shall be submitted to DAQ within 30 calendar days of the due date.

4. 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: *[AQR 12.5.2.6(d)]*

Table III-F-1: Required Report Submission Dates

Required Report	Applicable Period	Due Date[1]
Semi-annual Report for 1st Six-Month Period	January, February, March, April, May, June	July 30 each year
Semi-annual Report for 2nd Six-Month Period, Any additional annual records required.	July, August, September, October, November, December	January 30 each year
Annual Compliance Certification Report	Calendar Year	January 30 each year
Annual Emission Inventory Report	Calendar Year	March 31 each year
Notification of Deviations with Excess Emissions	As Required	Within 24 hours of the Permittee learns of the event
Report of Deviations with Excess Emissions	As Required	Within 72 hours of the notification
Deviation Report	As Required	Along with semi-annual 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.

5. 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 12.5.2.6(d)]*

6. 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 72 and 40 CFR 75. *[40 CFR 72]*

IV. MITIGATION

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

V. ACID RAIN REQUIREMENTS

1. In accordance with the provisions of Title IV of the Clean Air Act and 40 CFR Parts 72 through 77, this Acid Rain Permit is issued to SWG Nevada Holdings, LLC, North Las Vegas, Nevada.

2. All terms and conditions of the permit are enforceable by DAQ, EPA and citizens under the Clean Air Act. *[40 CFR 72]*

3. The Permittee shall comply with all the applicable requirements of the Acid Rain Permit Application. *[40 CFR 72.30]*

4. This Acid Rain permit incorporates the definitions of terms in 40 CFR Part 72.2. *[40 CFR 72.2]*

5. 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 DAQ. *[40 CFR 72.69]*

6. 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 12.5.2.6(d) and 40 CFR 73]*

VI. OTHER REQUIREMENTS

1. 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 standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in gases discharged to the atmosphere. *[40 CFR 60.12]*

2. 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

1. 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: *[AQR 12.5.2.9]*

Table VII-1: Applicable Requirements Related to Permit Shield

Citation	Title
AQR Section 14.1(b)(46) Subpart GG	Standards of Performance for New Stationary Sources (NSPS) – Stationary Gas Turbines

ATTACHMENT 1
APPLICABLE REGULATIONS

REQUIREMENTS SPECIFICALLY IDENTIFIED AS APPLICABLE:

1. NRS, Chapter 445B.
2. 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 12.4	Authority to Construct Application and Permits Requirements for Part 70 Sources
AQR Section 12.5	Part 70 Operating Permit Requirements
AQR Section 13	National Emission Standards for Hazardous Air Pollutants for Source Categories
AQR Section 14	Standards of Performance for New Stationary Sources (NSPS)
AQR Section 18	Permit and Technical Service Fees
AQR Section 25	Upset/Breakdown, Malfunctions
AQR Section 26	Emissions of Visible Air Contaminants
AQR Section 28	Fuel Burning Equipment
AQR Section 35	Diesel Engine Powered Electrical Equipment
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 60	Evaporation and Leakage
AQR Section 70	Emergency Procedures
AQR Section 80	Circumvention

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
40 CFR 60, Subpart A	Standards of Performance for New Stationary Sources (NSPS) – General Provisions
40 CFR 60, Subpart Dc	Standards of Performance for New Stationary Sources (NSPS) – Industrial-Commercial-Institutional Steam Generating Units
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 63, Subpart M	Emission Standards for Hazardous Air Pollutants for Asbestos
40 CFR 63, Subpart Q	Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers
40 CFR 70	Federally Mandated Operating Permits
40 CFR Part 72	Acid Rain Permits
40 CFR Part 73	Acid Rain Sulfur Dioxide Allowance System
40 CFR Part 75	Acid Rain CEMS
40 CFR 82	Protection of Stratospheric Ozone

ATTACHMENT 2
ACID RAIN PERMIT APPLICATION

United States
Environmental Protection Agency
Acid Rain Program

OMB No. 2060-0258

RECEIVED
CC-DAQM
2001 APR 27 P 1:38

Acid Rain Permit Application

For more information, see instructions and 40 CFR 72.30 and 72.31.

This submission is: • New • Revised •X for Acid Rain permit renewal

STEP 1

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

Las Vegas Cogeneration Limited Partnership Facility (Source) Name	Nevada State	10761 Plant Code

STEP 2

Enter the unit ID# for every affected unit at the affected source in column "a."

a	b
Unit ID#	Unit Will Hold Allowances in Accordance with 40 CFR 72.9(c)(1)
Unit 1	Yes
Unit 2	Yes
Unit 3	Yes
Unit 4	Yes
Unit 5	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes
	Yes

EPA Form 7610-16 (rev. 07-06)

Las Vegas Cogeneration Limited Partnership
Facility (Source) Name (from STEP 1)

STEP 3

Read the standard requirements.

Permit 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).

Las Vegas Cogeneration Limited Partnership
Facility (Source) Name (from STEP 1)

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;

Las Vegas Cogeneration Limited Partnership
Facility (Source) Name (from STEP 1)

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

Las Vegas Cogeneration Limited Partnership
Facility (Source) Name (from STEP 1)

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 Greg Trewitt	
Signature	Date 4-26-2011

EPA Form 7610-16 (rev. 07-06)

Rose Webster

From: Pangle, Jeffery <PangleJ@SouthwestGen.com>
Sent: Friday, July 26, 2013 6:46 AM
To: Rose Webster
Cc: Louallen, Bob; Trewitt, Greg; Fox, Randy
Subject: RE: Department of Air Quality Permit and Technical Support Document for Source #329 _Las Vegas Cogeneration Plant

Rose,

Thank you.

This email is to confirm receipt of the email containing the Title V Permit and TSD for Las Vegas Cogeneration Plant_ Source #329

Resp0ectfully,
Jeff Pangle
Plant Manager
Las Vegas Cogeneration
Southwest Generation Operating Company L.L.C. ®
1701 East ALexander Road
North Las Vegas, Nevada 89030
(O) 702-642-0331
(F) 702-642-8738

From: Rose Webster [mailto:rwebster@ClarkCountyNV.gov]
Sent: Thursday, July 25, 2013 2:36 PM
To: Trewitt, Greg; Pangle, Jeffery; Fox, Randy
Cc: Louallen, Bob
Subject: Department of Air Quality Permit and Technical Support Document for Source #329_Las Vegas Cogeneration Plant
Importance: High

Good afternoon gentlemen,

Attached is the Title V Permit and TSD for the above source.

You should print the document and maintain a copy in/on site.

If you have any questions, please contact Piotr Nowinski at 702-455-5942.

Please confirm receipt of this email.

Thank you,

Rosie Webster
Senior Office Specialist
Permitting Division

702-455-5913
rwebster@clarkcountynv.gov

Rose Webster

From: Louallen, Bob <LouallenB@SouthwestGen.com>
Sent: Friday, July 26, 2013 7:06 AM
To: Rose Webster; Pangle, Jeffery; Fox, Randy
Cc: Caccamise, Jonathan; Gleason, Michael
Subject: RE: Department of Air Quality Permit and Technical Support Document for Source #329 _Las Vegas Cogeneration Plant

I filed all of this at:
ENV-Safety Las Vegas > Air Quality > 2.02 Operating Permits > 2013 (Modification) Part 70 Title V Permit

Best Regards,
Bob

From: Rose Webster [mailto:rwebster@ClarkCountyNV.gov]
Sent: Thursday, July 25, 2013 2:36 PM
To: Trewitt, Greg; Pangle, Jeffery; Fox, Randy
Cc: Louallen, Bob
Subject: Department of Air Quality Permit and Technical Support Document for Source #329_Las Vegas Cogeneration Plant
Importance: High

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Please confirm receipt of this email.

Thank you,

Rosie Webster
Senior Office Specialist
Permitting Division

702-455-5913
rwebster@clarkcountynv.gov