



DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

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FINAL ACTION REPORT PART 70 OPERATING PERMIT RENEWAL

NEVADA POWER HARRY ALLEN STATION

Source: 533

Public Notice: Review-Journal June 14, 2009
Public Comment: June 15, 2009 to July 14, 2009

Comments Received:
US EPA Region IX
Nevada Power Company

Public Hearing: Not held

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

Copies of comments received and responses to all comments are part of this final action report. All responders shall receive an electronic copy of this report, the final Part 70 Operating Permit, and the final Technical Support Document.

COMMENTS RECEIVED FROM EPA REGION IX AND DAQEM RESPONSE

A comment was received from Mr. Roger Kohn, Air Division, of EPA Region IX. The comment is provided as Attachment 1 of this document. For the purpose of clarity, the comment and corresponding response from DAQEM are discussed in the section below.

EPA Comment #1:

“The TSD for the Harry Allen renewal states that acid rain requirements are applicable and that the source has applied, without further explanation. It appears that the permit does not contain any acid rain requirements. Did NV Power submit an acid rain renewal application to DAQEM? If so, one approach DAQEM could take would be to incorporate that application (which contains acid rain applicable requirements) by reference, adding just a few additional conditions. Or, instead of the incorporation by reference method, the District could put all the acid rain requirements directly into the Title V permit as specific permit conditions. Either way, the permit must address the facility’s acid rain obligations. We can advise you if you wish, but first we need to know if NV Power submitted a renewal application.”

DAQEM Response: DAQEM agreed with EPA’s observations and the following steps were taken to address the Comments:

- a. DAQEM contacted the source for providing the acid rain renewal application. The source submitted the acid rain renewal application on 6/16/2009.

- b. DAQEM incorporated a new section called "Acid Rain Requirements" attached the application to the Part 70 permit as Attachment 2. The final permit conditions are provided below:
1. *"In accordance with the provisions of Title IV of the Clean Air Act and 40 C.F.R. Parts 72 through 77, this Acid Rain Permit is issued to Nevada Power Harry Allen Station, Apex Dry Lake Industrial Park, Clark County NV.*
 2. *"All terms and conditions of the permit are enforceable by DAQEM and EPA under the Clean Air Act.*
 3. *"The permittee shall comply with all the applicable requirements of the Acid Rain Permit Application located in Attachment 2.*
 4. *"This Acid Rain permit incorporates the definitions of terms in 40 CFR Part 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 DAQEM.*
 6. *"A timely renewal application is an application that is received at least six months prior to the permit expiration date.*
 7. *"Emissions from this source shall not exceed any allowances that the source lawfully holds under Title IV of the Act or its regulations."*

COMMENTS RECEIVED FROM NEVADA POWER AND DAQEM RESPONSE

Nevada Power provided the Acid Rain application for Harry Allen Station, as requested by DAQEM after receiving comment from EPA during the public comment period. The Acid Rain application is attached at the end of this document as Attachment 2. The source's other comments regarding permit conditions are provided as Attachment 3.

DAQEM received comments for the source on July 10, 2009 and the relevant parts are provided below:

Nevada Power Comment #1:

1. The responsible official's title has changed since this permit was last drafted. NVE respectfully requests the following edits to the Responsible Official section of the permit cover page:

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

DAQEM Response:

DAQEM agreed with Nevada Power's observation and modified the language accordingly.

Nevada Power 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:
*“Harry Allen Station is anis situated in hydrographic area 216 (Garnet Valley). Garnet Valley is designated as ~~unclassified~~ **Subpart 1** nonattainment area for 8-hour ozone (regulated through NO_x and VOC) and is ~~PSD~~-attainment area for PM₁₀, CO, and SO₂.”*

DAQEM Response:

DAQEM incorporated the suggested language with slight modifications. The final permit language is provided below:

“Garnet Valley is designated as unclassified nonattainment area for 8-hour ozone (regulated through NO_x and VOC) and is attainment area for PM₁₀, CO, and SO₂.”

Nevada Power Comment #3:

3. **Executive Summary:** As stated on Page 7 of the TSD, the source-wide PTE listed in the Executive Summary are not limits. Therefore, NVE respectfully requests that DAQEM include the following footnote for the two tables: *“Not limits; values are estimates for informational purposes only.”*

DAQEM Response:

DAQEM incorporated the suggested language with slight modifications. The final permit language is provided below:

“Not a source emission limit; values are estimated for determining the major source status.”

Nevada Power Comment #4:

4. **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 II-C-3 be 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 agreed with Nevada Power’s observation and modified the language accordingly.

Nevada Power 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. 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 modified the language to address the comment. The final permit conditions (Conditions II-D-8 and II-D-9 in the Part 70 permit) are provided below:

8. *"The Permittee shall report to the Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) any upset, breakdown, malfunction, emergency or deviation which cause emissions of regulated air pollutants in excess of any limits set by regulation or by this permit. The report shall be in two parts as specified below:*
 - a. *within one (1) hour of the onset of the event, the report shall be communicated by phone (702) 455-5942, or by fax (702) 383-9994.*
 - b. *as soon as practicable but not exceeding ten (10) calendar days from the onset of the event, the detailed written report shall be submitted. Such reports shall include the probable cause of the excess emissions, emission calculations and any corrective actions taken.*
9. *"The Permittee shall report to the Control Officer deviations that do not result in excess emission, with the quarterly reports. Such reports shall include the probable cause of deviations and any corrective actions or preventative measures taken."*

Nevada Power Comment #6:

6. **Condition II-E-1:** AQR Section 4.5 requires that a copy of the test results must be submitted to DAQEM's Control Officer in writing and be signed by the person responsible for the tests. Therefore, NVE respectfully requests that Condition II-E-1 be revised as follows:
"Upon request of the Control Officer, the Permittee shall test or have tests performed to determine the emissions of air contaminants from any source qualified personnel. The Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) shall be given a copy of the test results in writing and signed by the person responsible for the tests."

DAQEM Response:

DAQEM agreed with Nevada Power's observation and modified the language accordingly.

Nevada Power Comment #7:

7. **Condition II-E-4:** Condition II-E-4 requires that all requests for any alternative test methods must be submitted 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. 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:

DAQEM incorporated the suggested language with slight modifications. The final permit condition (Condition IV-E-4 in the Part 70 permit) is provided below:

“The Permittee shall submit to EPA for approval any alternative test methods that are not already approved by EPA.”

Nevada Power Comment #8:

8. **Condition II-E-6:** AQR Section 10 requires existing sources 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 Condition II-E-6 be deleted from the permit.

DAQEM Response:

DAQEM agreed with Nevada Power’s observations, but modified the language rather than deleting it. The final permit condition (Condition IV-D-4 in the Part 70 permit) is provided below:

“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.”

Nevada Power Comment #9:

9. **Section III:** For clarity, NVE respectfully requests that DAQEM revise the permit language in Section III as suggested below:
“Nevada Power Harry Allen Station, as addressed by this Part 70 permit, is a major source for NO_x and CO and a minor source for PM₁₀, SO_x, VOC, and HAP. The emission rates listed in Table III-1 are not limits and are listed only for informational purposes.”

DAQEM Response:

DAQEM incorporated the suggested language with slight modifications. The final permit language is provided below:

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

Nevada Power Comment #10:

10. **Table IV-A-1:** In order to be consistent with Table IV-A-1 in the final ATCOP (Modification 6, Revision 3), NVE respectfully requests that DAQEM revise the emission unit type in Table IV-A-1 for EUs: A07, A08, and A10 to be listed as DM (de minimus) and revise table footnote 1 to include description for DM and full description for EE1.

DAQEM Response:

Emission Unit Type code has been changed as requested. In order to be consistent with currently issued permits, DAQEM removed the Billing Code Type and SCC Code columns from Table IV-A-1 of the Part 70 permit, but retained the information in the TSD.

Nevada Power Comment #11:

11. **Conditions IV-B-1-c and IV-D-1:** 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. Likewise, no reference to Method 9 is listed in the referenced ATC condition. Therefore, NVE respectfully requests that Condition IV-B-1-c be revised as follows. Also, Condition IV-B-1-c is incorrectly referenced in Condition IV-D-1 as Condition IV-B-1-b. Therefore, NVE respectfully requests that Condition IV-D-1 be revised to include the correct condition reference. *“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.~~ [NSR ATC Modification 6, Revision 3, Condition IV-B-1(d) (04/16/09)]”*

DAQEM Response:

DAQEM agreed with Nevada Power’s observation and modified the language accordingly.

Nevada Power Comment #12:

12. **Sections IV-C and IV-E:** For clarity, NVE respectfully requests that DAQEM include the following condition in the monitoring and recordkeeping sections of the permit to maintain consistency with the final ATC/OP issued on April 16, 2009:

“The source is subject to 40 CFR 60 Subparts A and GG, 40 CFR 70, 40 CFR 72 (Acid Rain Permits), 40 CFR 73 (Acid Rain Sulfur Dioxide Allowance System) and 40 CFR 75 (Acid Rain CEMS). It is the Permittee’s responsibility to know and comply with all requirements within these federal regulations. (AQR 14.1, 21.1, and 22.1 and 40 CFR 60.1, 60.330, 70.3, 72.6, 73.2, and 75.2)”

DAQEM Response:

DAQEM disagrees with including blanket statements covering a range of requirements in the Part 70 permit. Each specific requirement to which the source is subject should be included as a permit condition, while a list of regulations that apply to the source are identified in Attachment 1 of the Title V OP as well as in the TSD.

Nevada Power Comment #13:

13. **Condition IV-C-2:** For clarity, NVE respectfully requests that DAQEM include the correct emissions limit table reference number in this condition, revising this condition as follows:

“All emission recorded by the Turbine Unit 4 CEMS shall be... ..with the limits in Tables IV-B-2 and IV-B-54.”

DAQEM Response:

DAQEM agreed with Nevada Power’s observation and modified the language accordingly.

Nevada Power Comment #14:

14. **Condition IV-C-8:** In order to maintain consistency with Condition IV-C-12 in the final ATC/OP issued on April 16, 2009, NVE respectfully requests that DAQEM revise Condition IV-C-8 as follows:

*“The Permittee shall perform **at least one** visual emissions check each calendar quarter on a plant-wide level ~~for each emission unit~~.....corrective actions shall be taken to minimize the emissions and, if practicable, the opacity of emissions shall be visually determined in accordance with...”*

DAQEM Response:

DAQEM incorporated the suggested language with slight modifications. The final permit condition (Condition IV-C-9 in the Part 70 permit) is provided below:

“The Permittee shall perform at least one visual emissions check each calendar quarter. The quarterly visual checks shall include the diesel-fired emergency generators and fire pump (EUs: A07, A08, A10, and 53302) while operating, not necessarily simultaneously,

to demonstrate compliance with the opacity limit. If any of the diesel-fired emergency generators or fire pump does not operate during the calendar quarter, then no observation of that unit shall be required. If visible emissions are observed, then corrective actions shall be taken to minimize the emissions and the opacity of emissions shall be visually determined in accordance with 40 CFR 60 Appendix A: Reference Method 9.”

Nevada Power Comment #15:

15. **Condition IV-D-3:** NVE respectfully requests that DAQEM also include Method 18 (in addition to Method 25a) as an acceptable performance test method for VOC in Table IV-D-1.

DAQEM Response:

DAQEM agreed with Nevada Power's observation and modified the table accordingly.

Nevada Power Comment #16:

16. **Condition IV-E-4:** 40 CFR Part 68 requirements do not apply to any emission units included in this Title V permit. Upon construction of Turbine Units 5 and 6 (EUs:A01 and A02), the ammonia (NH₃) storage tank (EU:A06) will store aqueous ammonia solution having a concentration of 19% by weight, which is less than the applicability threshold in 40 CFR Part 68. Therefore, 40 CFR Part 68 will not apply to the Harry Allen Station even after addition of the units currently under ATC only and NVE respectfully requests that DAQEM delete Condition IV-E-4 from the permit.

DAQEM Response:

DAQEM agreed with Nevada Power's observation and removed the condition from the Part 70 permit.

Nevada Power Comment #17:

17. **Condition IV-F-4-b:** NVE shall follow 40 CFR Part 60 and 75 requirements for reporting during all “out of control” periods for each CEMS. Condition IV-F-4-b has no regulatory basis and is also not included in the final ATC (Modification 6, Revision 3). Therefore, NVE respectfully requests that DAQEM delete Condition IV-F-4-b from the permit.

DAQEM Response:

DAQEM agreed with Nevada Power's observation and removed the condition, but also added Condition IV-C-6.

“The Permittee shall take corrective actions as described in Appendix B of 40 CFR 75 if an out-of-control period to a monitor or CEMS occurs.”

Nevada Power Comment #18:

18. **Condition IV-F-4-e:** Condition IV-F-4-e requires that all quarterly 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 report submittal requirements that are different 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. Also, NVE notes that this condition incorrectly refers to the Title V permit as an ATC/OP. Therefore, NVE respectfully requests the regulatory authority for this condition or requests that DAQEM revise this condition as follows. NVE also respectfully requests that DAQEM revise the footnote to Table IV-F-1 accordingly.

"The report shall be received by DAQEM or postmarked within 30 calendar days... ...Regardless of the date of issuance of this ~~ATC/OP~~ Title V permit, the source..."

DAQEM Response:

DAQEM incorporated the suggested language with slight modifications. The final permit condition (Condition IV-C-9 in the Part 70 permit) is provided below:

- a. *"The report shall be submitted to the Control Officer within 30 calendar days after the calendar quarter.*
5. *"Regardless of the date of issuance of this Operating Permit, the source shall comply with the schedule for report submissions outlined in Table IV-F-1:"*

Comments on Technical Support Document:

Nevada Power Comment #19 (a):

- (a) Page 4: For completeness, NVE respectfully requests that DAQEM make the following revision in the Executive Summary: *"Nevada Power Company's Harry Allen Station..... In addition to these operating units, ATC permits have been issued to two additional turbine units **and a fire pump engine.**"*

DAQEM Response:

DAQEM agreed with Nevada Power's observation and modified the language accordingly.

Nevada Power Comment #19 (b):

- (b) Page 6: For clarity, NVE respectfully requests that DAQEM include the older permit history from previous versions of TSD in Table III-C-1.

DAQEM Response:

DAQEM does not see any reason for repeating the older permit history, which is included in the TSD for the last Title V renewal.

Nevada Power Comment #19 (c):

- (c) Page 6: In order to maintain consistency with the Title V permit conditions, NVE respectfully requests that DAQEM delete the following statement from Section III-D of the TSD.
~~“The permitted limit on natural gas consumption is 43,250 lb/hr.”~~

DAQEM Response:

DAQEM agreed with Nevada Power's observation and removed the condition from the TSD.

Nevada Power Comment #19 (d):

- (d) Page 7: Since Turbine Units 3 and 4 do not have hydrogen cooled electric generators, NVE respectfully requests that DAQEM delete this reference from Section IV-B of the TSD.

DAQEM Response:

DAQEM agreed with Nevada Power's observation and removed the condition from the TSD.

Nevada Power Comment #19 (e):

- (e) Page 11: For clarity, NVE respectfully requests that DAQEM revise the title of Table V-A-1 as follows:
“Table V-A-1: AQR Section 12 and 55 Summary Table for This Source (As Addressed By This Part 70 Permit)”

DAQEM Response:

DAQEM agreed with Nevada Power's observation and modified the language accordingly.

Nevada Power Comment #19 (f):

- (f) Page 12: NVE respectfully requests that DAQEM include reference to Acid Rain Permits (40 CFR Part 72 and DAQEM Section 21) and Acid Rain Continuous Emissions Monitoring (40 CFR Part 75 and DAQEM Section 22) in Table V-A-2.

DAQEM Response:

DAQEM agreed with Nevada Power's observation and modified the table accordingly.

Nevada Power Comment #19 (g):

- (g) Table VI-B-2: Turbine Unit 3 no longer combusts fuel oil and thus does not use water injection. Therefore, NVE respectfully requests that DAQEM delete references to water injection and fuel oil from Table VI-B-2.

DAQEM Response:

DAQEM agreed with Nevada Power's observation and removed the references from the table.

Nevada Power Comment #19 (h):

- (h) Table VI-D-1: Turbine Units 3 and 4 (EUs:55301 and A09) do not have any requirements in the permit to perform quarterly visual observations. Condition IV-C-8 of the permit requires at least one visual emission check on a plant-wide level to demonstrate compliance with the opacity limit in AQR Section 26. Therefore, NVE respectfully requests that DAQEM revise the compliance monitoring for EUs:55301 and A09 in Table VI-D-1 for AQR Section 26 as follows:
“Sole use of pipeline quality natural gas as fuel, quarterly visual emission checks on a plant-wide level, and EPA Method 9 performance testing as outlined in Condition IV-C-8 of the Part 70 Operating Permit.”

DAQEM Response:

DAQEM removed quarterly visual emission checks from the compliance monitoring for the combustion turbines since it does not apply. The final language is provided below:

“Sole use of pipeline quality natural gas as fuel and EPA Method 9 performance testing as outlined in Part 70 Operating Permit.”

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

Based on discussion with Region IX, DAQEM removed the requirement for performance tests results to be sent to EPA. The final permit condition (Condition II-E-5 in the Part 70 permit) is provided below:

“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.”

For clarity, DAQEM grouped the list of recordkeeping requirements by emission unit type and separated the ones that are required to be reported quarterly from those that are only required to be maintained onsite. The final permit conditions (Conditions IV-E-1 and IV-E-2 in the Part 70 permit) are provided below:

1. *“The Permittee shall record the following:
Turbine Units (EUs: A09 and 53301):*

- a. *the magnitude and duration of excess emissions, notifications, monitoring system performance, malfunctions, corrective actions taken, etc., as required by 40 CFR 60.7;*
 - b. *CEMS audit results, RATA, corrective actions, etc., as required by 40 CFR 60 and the CEMS quality assurance plan;*
 - c. *time, duration, nature, and probable cause of any CEMS downtime and corrective actions taken;*
 - d. *daily hours of operation with monthly totals for each turbine;*
 - e. *dates, times, and duration of each startup and shutdown event;*
 - f. *startup and shutdown short-term total emissions for Turbine Unit 4 (EU: A09) in pounds per hour and annual emissions for all turbines in tons per year (12-month rolling total);*
 - g. *monthly and rolling, 12-month total quantity of natural gas consumed in each gas turbine;*
 - h. *hourly heat input to each turbine unit; and*
IC Engines (EUs: A07, A08, A10, and 53302):
 - i. *monthly and rolling, 12-month total hours of operation of, and diesel fuel consumed by, each emergency generator and fire pump for testing and maintenance purposes and a separate log for operation during emergencies.*
2. *“The Permittee shall maintain records on site that include, at a minimum:*
- a. *sulfur content of diesel fuel as certified by the supplier;*
 - b. *sulfur content of natural gas as determined by Condition IV-C-8;*
 - c. *each CEMS “out-of-control” period, as defined in 40 CFR 75, Appendix B;*
 - d. *log of visual emissions checks;*
 - e. *results of performance testing conducted;*
 - f. *certificates of representation for the designated representative and the alternate designated representative that meet all requirements of 40 CFR 72.24;*
 - g. *copies of all reports, compliance certifications, other submissions, and all records made or required under the Acid Rain Program;*
 - h. *copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program; and*
 - i. *all CEMS information required by the CEMS monitoring plan as specified in 40 CFR 75 Subpart F.”*

DAQEM updated the requirement for quarterly reports to reflect the current list of recordkeeping requirements listed above and has modified the table to include the submission dates for all reports. The final permit conditions (Conditions IV-F-4 and IV-F-5 in the Part 70 permit) are provided below:

4. *“The following requirements apply to quarterly reports:*
- a. *The report shall include a quarterly summary of each item listed in Condition IV-E-1*
 - b. *The report shall include the item listed in Section IV-E-2(d) if different from the previous quarter.*

- c. The report shall be based on a calendar quarter, which includes partial calendar quarters.
 - d. The report shall be submitted to the Control Officer within 30 calendar days after the calendar quarter.
5. "Regardless of the date of issuance of this Operating Permit, the source shall comply with the schedule for report submissions outlined in Table IV-F-1:

"Table IV-F-1: Required Report Submission Dates

Required Report	Applicable Period	Due Date¹
Quarterly Report for 1 st Calendar Quarter	January, February, March	April 30 each year
Quarterly Report for 2 nd Calendar Quarter	April, May, June	July 30 each year
Quarterly Report for 3 rd Calendar Quarter	July, August, September	October 30 each year
Quarterly Report for 4 th Calendar Quarter, Any additional annual records required.	October, November, December	January 30 each year
Annual Compliance Certification Report	12 Months	30 days after the Operating Permit issuance anniversary date
Annual Emission Inventory Report	Calendar Year	March 31 each year
Excess Emission Notification	As Required	Within one (1) hour of the onset of the event
Excess Emission Report	As Required	As soon as practicable but not to exceed ten (10) calendar days from onset of the event
Deviation Report	As Required	Along with quarterly reports
Performance Testing	As Required	Within 60 days from the end of the test

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

In order to be consistent with currently issued permits, DAQEM moved the condition requiring annual emission inventory reports to the General Conditions section of the permit. The final permit condition (Conditions II-D-7 in the Part 70 permit) is provided below:

- "The Permittee shall submit annual emissions inventory reports based on the following:
- a. The annual emissions inventory shall be received by DAQEM no later than March 31 after the reporting year.
 - b. The report shall include the emission factors and calculations used to determine the emissions from each permitted emission unit, even when an emission unit is not operated."

Attachments:

1. EPA Comment on the Title V Renewal permit.
2. Communication between DAQEM and Nevada Power Company and Acid Rain application
3. Comments from Nevada Power Company

Attachment 1

From: Kohn.Roger@epamail.epa.gov
To: [Santosh Mathew](#); [Crystal Rosser](#)
Subject: Harry Allen Station - Acid Rain
Date: Tuesday, June 16, 2009 2:06:09 PM

Santosh, Crystal,

The TSD for the Harry Allen renewal states that acid rain requirements are applicable and that the source has applied, without further explanation. It appears that the permit does not contain any acid rain requirements. Did NV Power submit an acid rain renewal application to DAQEM? If so, one approach DAQEM could take would be to incorporate that application (which contains acid rain applicable requirements) by reference, adding just a few additional conditions. Or, instead of the incorporation by reference method, the District could put all the acid rain requirements directly into the Title V permit as specific permit conditions. Either way, the permit must address the facility's acid rain obligations. We can advise you if you wish, but first we need to know if NV Power submitted a renewal application.

Thanks.

Roger Kohn
USEPA Region 9 - Air Division (AIR-3)
75 Hawthorne Street
San Francisco, CA 94105-3901
Phone 415-972-3973
Fax: 415-947-3579

Attachment 2

From: Williams, Kimberly
To: Santosh Mathew
Cc: Crystal Rosser; Shil, Gaurav; Brewer, George
Subject: RE: Harry Allen Station - Acid Rain
Date: Tuesday, June 16, 2009 6:21:57 PM
Attachments: HA acid rain CAMD form.pdf

Santosh –

In regards to Roger's question, please see the following information:

NV Energy submitted a timely and complete Part 70 Operating Permit renewal application, including Acid Rain requirements, for Harry Allen Station on February 20, 2007. Acid Rain permits are part of the Part 70 program. Condition III-D-1 of the existing Part 70 Operating Permit requires compliance with the Acid Rain regulations and the facility continues to comply with these requirements. In addition, conditions III-D-8, D-10, D-16, F-3, G-1, and Table III-D-1 in the existing permit further enumerate the Acid Rain requirements, and the facility also continues to comply with these conditions.

It is our belief that the Acid Rain Permit follows the same expiration date as the Part 70 Operating Permit, although our permit does not explicitly state this. Our Part 70 Operating Permit renewal application included the Acid Rain renewal pursuant to 40CFR72.30(c). Section III-E and Table III-6 of the Part 70 Operating Permit renewal application lists Acid Rain requirements and their applicability and compliance methodologies, along with a request for permit shielding. Therefore, we believe we applied for a renewal of the Acid Rain Permit with the submittal of the Part 70 Operating Permit renewal application. However, we do not believe we have provided the form that EPA Clean Air Markets Division makes available for this purpose. It is attached. The Acid Rain Permit Application form does not provide any additional information beyond that in the Part 70 Operating Permit renewal application, nor does it bring in any new requirements. The renewal application contained a certification statement, as does the Acid Rain form. Note that the Part 70 Operating Permit renewal application, including Acid Rain requirements, is required to be submitted only to the Title V permitting authority, which in this case is DAQEM. We will provide a hardcopy of this form for your records.

We have not yet reviewed the draft Harry Allen Part 70 Operating Permit that you recently issued for public notice, so I cannot comment on its contents in relation to Acid Rain regulations.

As always, if you have any questions or need any further information, please feel free to contact me.

Regards,

Kimberly Williams | Manager, Environmental Services
NV Energy | PO Box 98910, Las Vegas, NV 89151
tel (702) 402-2184 | cell (702) 232-9385 | fax (702) 402-2051
kwilliams@nvenergy.com

From: Santosh Mathew [mailto:MATHEW@co.clark.nv.us]
Sent: Tuesday, June 16, 2009 2:55 PM
To: Williams, Kimberly
Cc: Crystal Rosser
Subject: FW: Harry Allen Station - Acid Rain

Kim,

Please see below a question from Roger Kohn.

Is the Harry Allen Acid Rain permit due for renewal? Did Harry Allen submit the Acid Rain Permit renewal application to EPA and a copy to DAQEM? I don't recall receiving the copy of the Acid Rain application. Please forward me a copy of the application if you already sent it to EPA.

Thanks

Santosh Mathew
Permitting Supervisor
Department of Air Quality and Environmental Management
Clark County, Nevada.

702-455-1685

Website: www.accessclarkcounty.com



Please consider the environment before printing this email

From: Kohn.Roger@epamail.epa.gov [mailto:Kohn.Roger@epamail.epa.gov]
Sent: Tuesday, June 16, 2009 2:06 PM
To: Santosh Mathew; Crystal Rosser
Subject: Harry Allen Station - Acid Rain

Santosh, Crystal,

The TSD for the Harry Allen renewal states that acid rain requirements are applicable and that the source has applied, without further explanation. It appears that the permit does not contain any acid rain requirements. Did NV Power submit an acid rain renewal application to DAQEM? If so, one approach DAQEM could take would be to incorporate that application (which contains acid rain applicable requirements) by reference, adding just a few additional conditions. Or, instead of the incorporation by reference method, the District could put all the acid rain requirements directly into the Title V permit as specific permit conditions. Either way, the permit must address the facility's acid rain obligations. We can advise you if you wish, but first we need to know if NV Power submitted a renewal application.

Thanks.

Roger Kohn
USEPA Region 9 - Air Division (AIR-3)
75 Hawthorne Street
San Francisco, CA 94105-3901
Phone 415-972-3973
Fax: 415-947-3579

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

Permit Requirements

STEP 3

Read the standard requirements.

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

Monitoring Requirements

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

Sulfur Dioxide Requirements

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

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

Sulfur Dioxide Requirements, Cont'd.

STEP 3, Cont'd.

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.

(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.

(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements

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

Excess Emissions Requirements

(1) The designated representative of an affected source that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.

(2) The owners and operators of an affected source that has excess emissions in any calendar year shall:

(i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and

(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:

(i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

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

Recordkeeping and Reporting Requirements, Cont'd.

STEP 3, Cont'd.

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

Liability

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

Effect on Other Authorities

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

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

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

Effect on Other Authorities, Cont'd.

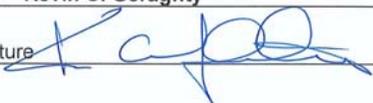
STEP 3, Cont'd.

to applicable National Ambient Air Quality Standards or State Implementation Plans;
 (2) Limiting the number of allowances a source can hold; *provided*, that the number of allowances held by the source shall not affect the source's obligation to comply with any other provisions of the Act;
 (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
 (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
 (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

Certification

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

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

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

Attachment 3



RECEIVED
CC-DAQM

2009 JUL 10 A 9:20

July 9, 2009

Mr. Santosh Mathew
Clark County Department of Air Quality and Environmental Management
500 S. Grand Central Parkway
Las Vegas, NV 89155

RE: Comments in Regard to Harry Allen Generating Station Proposed Part 70 Operating Permit
Facility Number 533

Dear Mr. Mathew:

Nevada Power Company d/b/a NV Energy (NVE) hereby provides comments on the proposed Harry Allen Generating Station Part 70 operating permit issued for public comment on June 15, 2009. NVE appreciates the time and effort expended by the Department of Air Quality and Environmental Management (DAQEM) in preparing the proposed permit. We also greatly appreciate the opportunity to comment on this proposed permit. Pursuant to 40 CFR § 71.11 (j), NVE requests DAQEM's responses to the comments below when the updated version of the permit is made available.

The following are NVE's comments and suggested changes to be made to the proposed Part 70 permit. Where appropriate, we have listed text to be added in bold, and text to be removed with bold and strikeout.

1. The responsible official's title has changed since this permit was last drafted. NVE respectfully requests the following edits to the Responsible Official section of the permit cover page:

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

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:
"Harry Allen Station is an. is situated in hydrographic area 216 (Garnet Valley). Garnet Valley is designated as ~~unclassified~~ **Subpart 1** nonattainment area for 8-hour ozone (regulated through NOx and VOC) and ~~is PSD-attainment~~ **area for PM₁₀, CO, and SO₂.**"
3. **Executive Summary:** As stated on Page 7 of the TSD, the source-wide PTE listed in the Executive Summary are not limits. Therefore, NVE respectfully requests that DAQEM include the following footnote for the two tables: "**Not limits; values are estimates for informational purposes only.**"

4. **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 II-C-3 be 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]"
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. 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.
6. **Condition II-E-1:** AQR Section 4.5 requires that a copy of the test results must be submitted to DAQEM's Control Officer in writing and be signed by the person responsible for the tests. Therefore, NVE respectfully requests that Condition II-E-1 be revised as follows:
"Upon request of the Control Officer, the Permittee shall test or have tests performed to determine the emissions of air contaminants from any source qualified personnel. The Control Officer (500 Grand Central Parkway, Box 555210, Las Vegas, NV 89155) shall be given a copy of the test results in writing and signed by the person responsible for the tests."
7. **Condition II-E-4:** Condition II-E-4 requires that all requests for any alternative test methods must be submitted 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. 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)]"
8. **Condition II-E-6:** AQR Section 10 requires existing sources 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 Condition II-E-6 be deleted from the permit.
9. **Section III:** For clarity, NVE respectfully requests that DAQEM revise the permit language in Section III as suggested below:
"Nevada Power Harry Allen Station, as addressed by this Part 70 permit, is a major source for NO_x and CO and a minor source for PM₁₀, SO_x, VOC, and HAP. The emission rates listed in Table III-1 are not limits and are listed only for informational purposes."

10. **Table IV-A-1:** In order to be consistent with Table IV-A-1 in the final ATCOP (Modification 6, Revision 3), NVE respectfully requests that DAQEM revise the emission unit type in Table IV-A-1 for EUs: A07, A08, and A10 to be listed as DM (de minimus) and revise table footnote 1 to include description for DM and full description for EE1.
11. **Conditions IV-B-1-c and IV-D-1:** 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. Likewise, no reference to Method 9 is listed in the referenced ATC condition. Therefore, NVE respectfully requests that Condition IV-B-1-c be revised as follows. Also, Condition IV-B-1-c is incorrectly referenced in Condition IV-D-1 as Condition IV-B-1-b. Therefore, NVE respectfully requests that Condition IV-D-1 be revised to include the correct condition reference.
"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.~~ [NSR ATC Modification 6, Revision 3, Condition IV-B-1(d) (04/16/09)]"
12. **Sections IV-C and IV-E:** For clarity, NVE respectfully requests that DAQEM include the following condition in the monitoring and recordkeeping sections of the permit to maintain consistency with the final ATC/OP issued on April 16, 2009:
"The source is subject to 40 CFR 60 Subparts A and GG, 40 CFR 70, 40 CFR 72 (Acid Rain Permits), 40 CFR 73 (Acid Rain Sulfur Dioxide Allowance System) and 40 CFR 75 (Acid Rain CEMS). It is the Permittee's responsibility to know and comply with all requirements within these federal regulations. (AQR 14.1, 21.1, and 22.1 and 40 CFR 60.1, 60.330, 70.3, 72.6, 73.2, and 75.2)"
13. **Condition IV-C-2:** For clarity, NVE respectfully requests that DAQEM include the correct emissions limit table reference number in this condition, revising this condition as follows:
"All emission recorded by the Turbine Unit 4 CEMS shall be... ..with the limits in Tables IV-B-2 and IV-B-54."
14. **Condition IV-C-8:** In order to maintain consistency with Condition IV-C-12 in the final ATC/OP issued on April 16, 2009, NVE respectfully requests that DAQEM revise Condition IV-C-8 as follows:
*"The Permittee shall perform **at least one** visual emissions check each calendar quarter on a plant-wide level ~~for each emission unit~~.....corrective actions shall be taken to minimize the emissions and, **if practicable**, the opacity of emissions shall be visually determined in accordance with..."*
15. **Condition IV-D-3:** NVE respectfully requests that DAQEM also include Method 18 (in addition to Method 25a) as an acceptable performance test method for VOC in Table IV-D-1.
16. **Condition IV-E-4:** 40 CFR Part 68 requirements do not apply to any emission units included in this Title V permit. Upon construction of Turbine Units 5 and 6 (EUs: A01 and A02), the ammonia (NH₃) storage tank (EU: A06) will store aqueous ammonia solution having a concentration of 19% by weight, which is less than the applicability threshold in 40 CFR Part 68. Therefore, 40 CFR Part 68

will not apply to the Harry Allen Station even after addition of the units currently under ATC only and NVE respectfully requests that DAQEM delete Condition IV-E-4 from the permit.

17. **Condition IV-F-4-b:** NVE shall follow 40 CFR Part 60 and 75 requirements for reporting during all “out of control” periods for each CEMS. Condition IV-F-4-b has no regulatory basis and is also not included in the final ATC (Modification 6, Revision 3). Therefore, NVE respectfully requests that DAQEM delete Condition IV-F-4-b from the permit.
18. **Condition IV-F-4-e:** Condition IV-F-4-e requires that all quarterly 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 report submittal requirements that are different 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. Also, NVE notes that this condition incorrectly refers to the Title V permit as an ATC/OP. Therefore, NVE respectfully requests the regulatory authority for this condition or requests that DAQEM revise this condition as follows. NVE also respectfully requests that DAQEM revise the footnote to Table IV-F-1 accordingly.
“The report shall be received by DAQEM or postmarked within 30 calendar days... ..Regardless of the date of issuance of this ~~ATC/OP~~ Title V permit, the source...”
19. Based on the comments above, NVE respectfully requests that DAQEM make corresponding revisions to relevant sections of the TSD. For the sake of brevity, these corresponding edits to the TSD are not listed in this letter. In addition to the revisions based on comments above, NVE also requests that DAQEM make the following edits to the TSD:
 - (a) Page 4: For completeness, NVE respectfully requests that DAQEM make the following revision in the Executive Summary: *“Nevada Power Company’s Harry Allen Station..... In addition to these operating units, ATC permits have been issued to two additional turbine units **and a fire pump engine.**”*
 - (b) Page 6: For clarity, NVE respectfully requests that DAQEM include the older permit history from previous versions of TSD in Table III-C-1.
 - (c) Page 6: In order to maintain consistency with the Title V permit conditions, NVE respectfully requests that DAQEM delete the following statement from Section III-D of the TSD.
“~~The permitted limit on natural gas consumption is 43,250 lb/hr.~~”
 - (d) Page 7: Since Turbine Units 3 and 4 do not have hydrogen cooled electric generators, NVE respectfully requests that DAQEM delete this reference from Section IV-B of the TSD.

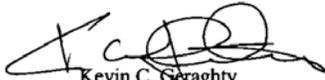
¹ CAA Q&A Database, March 1999 and May 2004.

Mr. Santosh Mathew
July 10, 2009
Page 5 of 5

- (e) Page 11: For clarity, NVE respectfully requests that DAQEM revise the title of Table V-A-1 as follows:
"Table V-A-1: AQR Section 12 and 55 Summary Table for This Source (As Addressed By This Part 70 Permit)"
- (f) Page 12: NVE respectfully requests that DAQEM include reference to Acid Rain Permits (40 CFR Part 72 and DAQEM Section 21) and Acid Rain Continuous Emissions Monitoring (40 CFR Part 75 and DAQEM Section 22) in Table V-A-2.
- (g) Table VI-B-2: Turbine Unit 3 no longer combusts fuel oil and thus does not use water injection. Therefore, NVE respectfully requests that DAQEM delete references to water injection and fuel oil from Table VI-B-2.
- (h) Table VI-D-1: Turbine Units 3 and 4 (EUs:55301 and A09) do not have any requirements in the permit to perform quarterly visual observations. Condition IV-C-8 of the permit requires at least one visual emission check on a plant-wide level to demonstrate compliance with the opacity limit in AQR Section 26. Therefore, NVE respectfully requests that DAQEM revise the compliance monitoring for EUs:55301 and A09 in Table VI-D-1 for AQR Section 26 as follows:
"Sole use of pipeline quality natural gas as fuel, quarterly visual emission checks on a plant-wide level, and EPA Method 9 performance testing as outlined in Condition IV-C-8 of the Part 70 Operating Permit."

NVE greatly values the opportunity to review and comment on this draft permit. Please feel free to contact Kim Williams at (702) 402-2184 should you have any questions.

Sincerely,



Kevin C. Geraghty
Vice President, Power Generation
NV Energy

cc: K. Williams
G. Shil
G. Brewer
File