



**DES**  
DEPARTMENT OF ENVIRONMENT  
AND SUSTAINABILITY



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# **PART 70 TECHNICAL SUPPORT DOCUMENT (STATEMENT of BASIS)**

APPLICATION FOR:  
**Part 70 Operating Permit Reopening for Cause**

SUBMITTED BY:  
Initiated by DES

FOR:  
Clark Generating Station  
**Source ID: 7**

LOCATION:  
5640 Stephanie Street  
Las Vegas, NV 89122

SIC codes 4911, "Electric Services"  
NAICS codes 221112, "Fossil Fuel Electric Power Generation"

TSD Date: November 23, 2021

## **I. SOURCE INFORMATION**

### **A. General**

Permittee Nevada Power Company  
Address PO Box 98910  
(Mailing/Billing): Las Vegas Nevada 89151  
Responsible Official: Dariusz Rekowski  
Telephone Number: (702) 402-5762  
Contact: Sean Spitzer  
Telephone Number: 702) 402-5132

### **B. Description of Process**

Nevada Power Company operates an electrical power generating station in Las Vegas, Nevada.

### **C. Permitting Actions**

#### **Reopening for Cause Dated August 9, 2021: Emission Statement**

The Department of Environment and Sustainability, Division of Air Quality (DAQ) has identified this source as possibly emitting 25 tons or more of actual emissions for oxides of nitrogen (NO<sub>x</sub>) and/or volatile organic compounds (VOCs) in any calendar year. Clark County was required to implement Section 182(a)(3)(B) of the Clean Air Act (CAA) which requires all ozone nonattainment areas to have in place a program that requires emissions statements from stationary sources of NO<sub>x</sub> and/or VOCs.

Section 12.9.1 of the Clark County Air Quality Regulations (AQRs) codifies this requirement for Clark County and states the following:

- a. The Responsible Official of each Stationary Source that emits 25 tons or more of NO<sub>x</sub> and/or VOC shall submit an Annual Emissions Statement (Statement) to the department for the previous calendar year.
- b. Pursuant to CAA Section 182, the Statement must include all actual emissions for all NO<sub>x</sub> and VOC emitting activities.
- c. The Statement shall be submitted to and received by the department on or before March 31 of each year or other date, upon prior notice by the Control Officer, and shall include a certification that the information contained in the Statement is accurate to the best knowledge of the individual certifying the Statement.

A condition requiring submittal of annual emission statement has been included in the permit.

### **D. Public Participation**

Pursuant to AQR 12.5.2.17, the Control Officer should provide for public notice, comment, and an opportunity for a hearing on initial permit issuances, significant revisions, reopenings for cause, and renewals in accordance with the procedures outlined in the regulation. Given the broad range of changes that can be addressed through a reopening of the permit, including those that typically do not require public participation, DAQ relied on the other criteria for public participation to ascertain whether it should be initiated for this reopening of the permit. As the updates addressed

in this reopening qualify as neither an initial permit issuance nor a renewal of the Title V permit, the criteria for a significant permit revision was used to determine whether public participation is warranted. The changes addressed in this reopening of the permit do not meet any criterion for a significant revision that would otherwise require public participation. Instead, the changes addressed in this reopening introduce permit conditions that are more stringent than those in the current permit and should not be a matter of public objection. Therefore, considering the stringency of the new permit conditions, the cost of a public notice publication, and the delay in permit issuance relating to a public comment period, initiation of another public participation process cannot be adequately supported.