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## PART 70 OPERATING PERMIT

**SOURCE ID: 16304**

Switch, Ltd.  
7135 S. Decatur Blvd.  
Las Vegas, NV 89118

**ISSUED ON: July 1, 2021**

**EXPIRES ON: June 30, 2026**

**Revised on: September 12, 2022**

**Current Action: Significant Revision**

**Issued to:**

Switch, Ltd.  
P.O. Box 400850  
Las Vegas, Nevada 89140

**Responsible Official:**

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**NATURE OF BUSINESS:**

SIC code 7375, "Information Retrieval Services"  
NAICS code 517919, "All Other Telecommunications"

**Issued by the Clark County Department of Environment and Sustainability, Division of Air Quality in accordance with Section 12.5 of the Clark County Air Quality Regulations.**

Theodore A. Lendis, Permitting Manager

## EXECUTIVE SUMMARY

Switch, Ltd., is a major stationary source for NO<sub>x</sub>, a synthetic minor source for CO, and a minor source for PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, VOCs, and HAPs. The source is also identified as a source of greenhouse gases. It is located on 7315 S. Decatur Blvd., Las Vegas, Nevada, in the Las Vegas Valley (Hydrographic Area 212), which is in attainment for all regulated air pollutants except ozone; effective August 3, 2018, the U.S. Environmental Protection Agency (EPA) designated HA 212 in marginal nonattainment for the 2015 ozone National Ambient Air Quality Standard (NAAQS). HA 212 is also subject to a maintenance plan for the CO and PM<sub>10</sub> NAAQS.

Switch, Ltd. owns and operates six separate and adjacent advanced technology ecosystem communications facilities, referred to as NAP 7, NAP 8, NAP 9, NAP 10, NAP 11, and NAP 12. The source is categorized under SIC code 7375, “Information Retrieval Services,” and NAICS code 517919, “All Other Telecommunications.” Switch is not classified as a categorical Stationary Source, as defined in AQR 12.2.2(j).

The following table summarizes the source’s potential to emit each regulated air pollutant from all emission units addressed by this Part 70 Operating Permit:

**Table 1: Source-wide Potential to Emit (tons per year)**

PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP	GHG <sup>1</sup>
6.67	2.60	242.06	32.04	1.28	3.65	1.28	23,637.13

<sup>1</sup>GHG expressed as CO<sub>2</sub>.

Table 2 summarizes the source’s PTE including all units for which and authority to construct has been issued.

**Table 2: Source-wide PTE including Unconstructed Emission Units (tons per year)**

PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP	GHG <sup>1</sup>
6.98	2.69	246.18	32.58	1.30	3.71	1.30	24,048.43

<sup>1</sup>GHG expressed as CO<sub>2</sub>.

DAQ received the revision application on April 5, 2021. Based on information submitted by the applicant and a technical review performed by the DAQ staff, DAQ proposes the issuance of a revised Part 70 Operating Permit to Switch.

Pursuant to AQR 12.5.2, all terms and conditions in Sections I–V and the Attachments of this permit are federally enforceable unless explicitly denoted otherwise.

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## Common Acronyms and Abbreviations

(These terms may be seen in the permit)

<b>Term</b>	<b>Description</b>
AQR	Clark County Air Quality Regulations
ATC	Authority to Construct
CE	control efficiency
CF	control factor
CFR	United States Code of Federal Regulations
CO	carbon monoxide
DAQ	Division of Air Quality
DES	Department of Environment and Sustainability
EF	emission factor
EPA	United States Environmental Protection Agency
EU	emission unit
HAP	hazardous air pollutant
HP	horsepower
NAC	Nevada Administrative Code
NO <sub>x</sub>	nitrogen oxides
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standards
NSR	New Source Review
OP	Operating Permit
PM <sub>10</sub>	particulate matter less than 10 microns
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTE	potential to emit
scf	standard cubic feet
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
TSD	Technical Support Document
USGS	United States Geological Survey
UTM	Universal Transverse Mercator
VOC	volatile organic compound

## I. EQUIPMENT

### 1.1 EMISSION UNITS

The stationary source covered by this Part 70 Operating Permit consists of the emission units and associated appurtenances summarized in Tables 1-1 through 1-6. [AQR 12.5.2.3; ATC/OP 08/19/2008, Condition III-A; ATC/OP 02/18/2009, Condition III-A; ATC 06/27/2014, Condition IV-A-1-a; ATC 02/25/15, Condition IV-A-1-a; Part 70 OP 02/26/2016, Condition III-A-1; Part 70 OP 11/27/2017, Condition III-A-1; Part 70 06/18/2018, Condition III-A-1; Part 70 OP 12/20/2018, Condition III-A-1; Part 70 OP 06/24/2019, Condition III-A-1; and 16304\_20210226\_COM incorporated into the Part 70 OP]

**Table 1-1: List of Emission Units NAP 7**

EU	Rating	Description	Make	Model	Serial
A02	2,300 kW	Generator, Emergency	Detroit Diesel	2250 DSEC	2185979
	3,353 hp	Diesel Engine, DOM: 2007			
A03	2,320 kW	Generator, Emergency	Detroit Diesel	744RSL5163	WA-6006372-1219
	3,353 hp	Diesel Engine, DOM: 2007			
A04	2,300 kW	Generator, Emergency	Detroit Diesel	2250 DSEC	2185985
	3,353 hp	Diesel Engine, DOM: 2007			
A05	2,300 kW	Generator, Emergency	Detroit Diesel	2250 DSEC	2183861
	3,353 hp	Diesel Engine, DOM: 2007			
A06	2,300 kW	Generator, Emergency	Detroit Diesel	2250 DSEC	2183870
	3,353 hp	Diesel Engine, DOM: 2007			
A07	2,250 kW	Generator, Emergency	Detroit Diesel	2250RXC6DT2	176196-1-2-0608
	3,353 hp	Diesel Engine, DOM: 2008			
A08	2,250 kW	Generator, Emergency	Detroit Diesel	2250RXC6DT2	175966-1-2-0608
	3,353 hp	Diesel Engine, DOM: 2008			
A09	2,250 kW	Generator, Emergency	Detroit Diesel	2250RXC6DT2	175966-1-3-0608
	3,353 hp	Diesel Engine, DOM: 2008			
A10	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	330055-1-2-0311
	3,353 hp	Diesel Engine, DOM: 2010			
A11	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	330055-1-3-0311
	3,353 hp	Diesel Engine, DOM: 2010			
A12	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	330055-1-1-0311
	3,353 hp	Diesel Engine, DOM: 2010			
A13	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	333726-1-1-0811
	3,353 hp	Diesel Engine, DOM: 2011			
A14	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	333726-2-2-0811
	3,353 hp	Diesel Engine, DOM: 2011			

<b>EU</b>	<b>Rating</b>	<b>Description</b>	<b>Make</b>	<b>Model</b>	<b>Serial</b>
A15	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	333726-2-1-0811
	3,353 hp	Diesel Engine, DOM: 2011			
A16	2,250 kW	Generator, Emergency	Marathon Electric	2250RXC6DT2	334657-1-1-0811
	3,353 hp	Diesel Engine, DOM: 2011			
A17	2,250 kW	Generator, Emergency	Marathon Electric	2250RXC6DT2	341530-1-1-0112
	3,353 hp	Diesel Engine, DOM: 2011			
A18	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	341565-1-3-0212
	3,353 hp	Diesel Engine, DOM: 2011			
A19	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	369767-1-1-0214
	3,353 hp	Diesel Engine, DOM: 2014			
A20	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	341565-1-1-0212
	3,353 hp	Diesel Engine, DOM: 2011			
A21	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	346646-1-1-0512
	3,353 hp	Diesel Engine, DOM: 2011			
A22	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	348117-1-3-0812
	3,353 hp	Diesel Engine, DOM: 2011			
A23	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	348117-1-1-1112
	3,353 hp	Diesel Engine, DOM: 2012			
A24	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	356251-1-4-0213
	3,353 hp	Diesel Engine, DOM: 2013			
A25	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	346646-1-2-0512
	3,353 hp	Diesel Engine, DOM: 2011			
A26	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	348117-1-2-0812
	3,353 hp	Diesel Engine, DOM: 2011			
A27	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	36251-1-1-0213
	3,353 hp	Diesel Engine, DOM: 2013			
A28	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	356251-1-2-0213
	3,353 hp	Diesel Engine, DOM: 2013			
A29	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	356251-1-3-0213
	3,353 hp	Diesel Engine, DOM: 2013			
A32	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	369338-1-3-0114
	3,353 hp	Diesel Engine, DOM: 2014			
A33	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	369338-1-1-0114
	3,353 hp	Diesel Engine, DOM: 2014			
A34	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	369338-1-2-0114
	3,353 hp	Diesel Engine, DOM: 2014			
B01	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	7-324424

EU	Rating	Description	Make	Model	Serial
B02	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	7-324425
B03	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	7-324426
B04	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	7-324359
B05	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	7-324360
B07	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	10-386399
B08	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	10-386400
B09	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	10-386401
B10	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	11-411470
B11	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	11-411468
B12	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	11-411469
B13	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	11-452969
B14	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	11-452982
B15	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	11-452987
B16	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	12-468991
B17	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	12-468982
B18	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	12-468985
B19	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	12-468996
B20	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	13-523739
B21	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	13-658453
B23	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	14-719109

**Table 1-2: Summary of Emissions Units NAP 8**

EU	Rating	Description	Make	Model	Serial
C01	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	348116-1-1-0712
	3,353 hp	Diesel Engine, DOM: 2011			
C02	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	348116-1-2-0712
	3,353 hp	Diesel Engine, DOM: 2011			
C03	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	348116-1-3-0712
	3,353 hp	Diesel Engine, DOM: 2011			
C04	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	360838-1-3-0713
	3,353 hp	Diesel Engine, DOM: 2013			
C05	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	360838-1-1-0713
	3,353 hp	Diesel Engine, DOM: 2013			
C06	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	360838-1-2-0713
	3,353 hp	Diesel Engine, DOM: 2013			
C07	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	365276-1-1-1013
	3,353 hp	Diesel Engine, DOM: 2013			



EU	Rating	Description	Make	Model	Serial
C08	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	365276-1-2-1013
	3,353 hp	Diesel Engine, DOM: 2013			
C09	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	365276-1-3-1013
	3,353 hp	Diesel Engine, DOM: 2013			
C10	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	369877-1-1-0514
	3,353 hp	Diesel Engine, DOM: 2014			
C11	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	369877-1-3-0614
	3,353 hp	Diesel Engine, DOM: 2014			
C12	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	369877-1-2-0614
	3,353 hp	Diesel Engine, DOM: 2014			
C13	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	370421-1-1-0514
	3,353 hp	Diesel Engine, DOM: 2014			
C14	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	370421-1-2-0514
	3,353 hp	Diesel Engine, DOM: 2014			
C15	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	370421-1-3-0514
	3,353 hp	Diesel Engine, DOM: 2014			
C16	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	341565-1-2-0212
	3,353 hp	Diesel Engine, DOM: 2011			
C17	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	369767-1-3-0214
	3,353 hp	Diesel Engine, DOM: 2014			
C18	2,250 kW	Generator, Emergency	Marathon Electric	2250LXC6DT2	369767-1-2-0214
	3,353 hp	Diesel Engine, DOM: 2015			
C19	2,250 kW	Generator, Emergency	Marathon Electric	16V4000DS225 0	95030500170
	3,353 hp	Diesel Engine, DOM: 2015			
C20	2,250 kW	Generator, Emergency	Marathon Electric	16V4000DS225 0	95030500168
	3,353 hp	Diesel Engine, DOM: 2015			
C21	2,250 kW	Generator, Emergency	Marathon Electric	16V4000DS225 0	95030500169
	3,353 hp	Diesel Engine, DOM: 2015			
C22	2,250 kW	Generator, Emergency	Marathon Electric	16V4000DS225 0	95030500326
	3,353 hp	Diesel Engine, DOM: 2015			
C23	2,250 kW	Generator, Emergency	Marathon Electric	16V4000DS225 0	95030500327
	3,353 hp	Diesel Engine, DOM: 2015			
C24	2,250 kW	Generator, Emergency	Marathon Electric	16V4000DS225 0	95030500325
	3,353 hp	Diesel Engine, DOM: 2015			
C25	1,500 gpm	Fire Pump	Patterson	8x6 MI	FP-CO114338
	110 hp	Diesel Engine, DOM: 2012	John Deere	4045HFC28	PE4045L219637
C26	200 kW	Generator, Emergency	MTU	MTU 6R0120 DS200	95130500694
	331 hp	Diesel Engine, DOM: 2006+			

EU	Rating	Description	Make	Model	Serial
C27	52 kW	Generator, Emergency	Kohler	KDI3404TM	4926901800
	86 hp	Diesel Engine, DOM: 2019		50REOZK	33H3GMGR0013
C28	52 kW	Generator, Emergency	Kohler	KDI3404TM	4928902370
	86 hp	Diesel Engine, DOM: 2019		50REOZK	33H3GMHG0001
C29	42 kW	Generator, Emergency	Kohler	KDI3404TM	5033501540
	67 hp	Diesel Engine, DOM: 2020		40REOZK	33FYGMJD0009
C30	42 kW	Generator, Emergency	Kohler	KDI3404TM	5030802160
	67 hp	Diesel Engine, DOM: 2020		40REOZK	33FYGMJD0011
D01	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460C	12-485179
D02	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460C	12-485182
D03	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460C	13-544070
D04	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460C	13-544060
D05	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460C	14-673905
D06	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460C	14-686651
D07	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460C	13-655349
D08	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	13-655348
D10	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	14-686661
D11	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460C	14-686648
D12	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460C	14-686653
D13	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	17-820571
D14	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	15-767529
D16	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	20P104320

**Table 1-3: Summary of Emissions Units NAP 9**

EU	Rating	Description	Make	Model	Serial
G01	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500461
	3,353 hp	Diesel Engine, DOM: 2016			
G02	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500157
	3,353 hp	Diesel Engine, DOM: 2015			
G03	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500463
	3,353 hp	Diesel Engine, DOM: 2016			

<b>EU</b>	<b>Rating</b>	<b>Description</b>	<b>Make</b>	<b>Model</b>	<b>Serial</b>
G04	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500158
	3,353 hp	Diesel Engine, DOM: 2015			
G05	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500494
	3,353 hp	Diesel Engine, DOM: 2016			
G06	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500159
	3,353 hp	Diesel Engine, DOM: 2015			
G07	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500628
	3,353 hp	Diesel Engine, DOM: 2017			
G08	2,250 kW	Generator, Emergency	Marathon Electric	16V4000DS2250	95030500331
	3,353 hp	Diesel Engine, DOM: 2015			
G09	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500631
	3,353 hp	Diesel Engine, DOM: 2017			
G10	2,250 kW	Generator, Emergency	Marathon Electric	16V4000DS2250	95030500330
	3,353 hp	Diesel Engine, DOM: 2015			
G11	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500634
	3,353 hp	Diesel Engine, DOM: 2017			
G12	2,250 kW	Generator, Emergency	Marathon Electric	16V4000DS2250	95030500332
	3,353 hp	Diesel Engine, DOM: 2015			
G13	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500256
	3,353 hp	Diesel Engine, DOM: 2015			
G14	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500483
	3,353 hp	Diesel Engine, DOM: 2016			
G15	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500255
	3,353 hp	Diesel Engine, DOM: 2015			
G16	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500484
	3,353 hp	Diesel Engine, DOM: 2016			
G17	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500249
	3,353 hp	Diesel Engine, DOM: 2015			
G18	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500485
	3,353 hp	Diesel Engine, DOM: 2016			
G19	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500557
	3,353 hp	Diesel Engine, DOM: 2016			
G20	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500626
	3,353 hp	Diesel Engine, DOM: 2017			
G21	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500555
	3,353 hp	Diesel Engine, DOM: 2016			
G22	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500624
	3,353 hp	Diesel Engine, DOM: 2017			

EU	Rating	Description	Make	Model	Serial
G23	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500625
	3,353 hp	Diesel Engine, DOM: 2017			
G24	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500698
	3,353 hp	Diesel Engine, DOM: 2017			
H01	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	14-715086
H02	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	14715088
H03	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	15770216
H04	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	17-804846
H06	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	16-795374
H07	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	15-758292
H08	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	15-758298
H09	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	15766408
H10	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	15766416
H11	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	16-795365
H12	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	17-818677
H13	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	16782903
H14	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	16782926
H15	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	16801280
H16	1,250 gpm	Cooling Tower	Evapco	ESWB1246018	17804855
H17	800 gpm	Cooling Tower	Evapco	ESWA-102-45J-Z-C	17-822513
H18	800 gpm	Cooling Tower	Evapco	ESWA-102-45J-Z-C	17-822512

**Table 1-4: Summary of Emissions Units NAP 10**

EU	Rating	Description	Make	Model	Serial
E01	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500632
	3,353 hp	Diesel Engine, DOM: 2017			
E02	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500493
	3,353 hp	Diesel Engine, DOM: 2016			
E03	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500627
	3,353 hp	Diesel Engine, DOM: 2017			
E04	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500462
	3,353 hp	Diesel Engine, DOM: 2016			
E05	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500633
	3,353 hp	Diesel Engine, DOM: 2017			

<b>EU</b>	<b>Rating</b>	<b>Description</b>	<b>Make</b>	<b>Model</b>	<b>Serial</b>
E06	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500492
	3,353 hp	Diesel Engine, DOM: 2016			
E07	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500703
	3,353 hp	Diesel Engine, DOM: 2017			
E08	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500701
	3,353 hp	Diesel Engine, DOM: 2017			
E09	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500700
	3,353 hp	Diesel Engine, DOM: 2017			
E10	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500702
	3,353 hp	Diesel Engine, DOM: 2017			
E11	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500766
	3,353 hp	Diesel Engine, DOM: 2017			
E12	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500699
	3,353 hp	Diesel Engine, DOM: 2017			
E13	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501092
	3,353 hp	Diesel Engine, DOM: 2018			
E14	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501091
	3,353 hp	Diesel Engine, DOM: 2018			
E15	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501098
	3,353 hp	Diesel Engine, DOM: 2018			
E16	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501065
	3,353 hp	Diesel Engine, DOM: 2018			
E17	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501068
	3,353 hp	Diesel Engine, DOM: 2018			
E18	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501064
	3,353 hp	Diesel Engine, DOM: 2018			
E19	1,500 gpm	Fire Pump	Clarke	8x6 MI	FP-CO133769
	125 hp	Diesel Engine, DOM: 2014	John Deere	4045HFC28	PE4045L2666 93
E20	1,500 gpm	Fire Pump	Clarke	8x6 MI	FP-CO152216
	125 hp	Diesel Engine, DOM: 2016	John Deere	4045HFC28	PE4045N0000 49
F01	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	16-799616

EU	Rating	Description	Make	Model	Serial
F02	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	16-798860
F03	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	18-836259
F05	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	16-804570
F06	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	16-804573
F07	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	19-873232
F09	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	17-831176
F10	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	17-831179
F11	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	19-872198
F12	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	20P101332

**Table 1-5: Summary of Emissions Units NAP 11**

EU	Rating	Description	Make	Model	Serial
J01	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500919
	3,353 hp	Diesel Engine, DOM: 2018			
J02	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500920
	3,353 hp	Diesel Engine, DOM: 2018			
J03	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500921
	3,353 hp	Diesel Engine, DOM: 2018			
J04	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500926
	3,353 hp	Diesel Engine, DOM: 2018			
J05	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500925
	3,353 hp	Diesel Engine, DOM: 2018			
J06	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500927
	3,353 hp	Diesel Engine, DOM: 2018			
J07	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501900
	3,353 hp	Diesel Engine, DOM: 2019	Detroit Diesel	16V4000G83	5482000210
J08	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501820
	3,353 hp	Diesel Engine, DOM: 2019	Detroit Diesel		5482000191
J09	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501901
	3,353 hp	Diesel Engine, DOM: 2019	Detroit Diesel	16V4000G83	5482000209
J10	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501822
	3,353 hp	Diesel Engine, DOM: 2019	Detroit Diesel		5482000192
J11	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501908
	3,353 hp	Diesel Engine, DOM: 2019	Detroit Diesel	16V4000G83	5482000208

EU	Rating	Description	Make	Model	Serial
J12	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501821
	3,353 hp	Diesel Engine, DOM: 2019	Detroit Diesel		5482000190
J13	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501909
	3,353 hp	Diesel Engine, DOM: 2019	Detroit Diesel	16V4000G83	5482000212
J14	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501910
	3,353 hp	Diesel Engine, DOM: 2019	Detroit Diesel	16V4000G83	5482000211
J15	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501911
	3,353 hp	Diesel Engine, DOM: 2019	Detroit Diesel	16V4000G83	5482000207
J16	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501979
	3,353 hp	Diesel Engine, DOM: 2019	Detroit Diesel	16V4000G24S	5482000244
J17	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501981
	3,353 hp	Diesel Engine, DOM: 2019	Detroit Diesel	16V4000G24S	5482000246
J18	2,250 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030501980
	3,353 hp	Diesel Engine, DOM: 2019	Detroit Diesel	16V4000G24S	5482000245
J19	1,500 gpm	Fire Pump	Patterson	8x6 MI	FP-C0168036-01
	125 hp	Diesel Engine, DOM: 2018	John Deere	6068HFC48	PE6068N007610
K01	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	17-833057
K02	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460	17-833082
K03	1,250 gpm	Cooling Tower	Evapco	ESWA-216-460-C	19-872170
K05	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460-C	19-871147
K06	1,250 gpm	Cooling Tower	Evapco	ESWA 216-460-C	19-871155
K07	1,250 gpm	Cooling Tower	Evapco	ESWA-216-460-C	19-872176
K09	1,250 gpm	Cooling Tower	Evapco	ESWA-216-460	19-871162
K10	1,250 gpm	Cooling Tower	Evapco	ESWA-216-460	19-871158
K11	1,250 gpm	Cooling Tower	Evapco	ESWA-216-460	20P103709

**Table 1-6: Summary of Emissions Units NAP 12**

EU	Rating	Description	Make	Model	Serial
L01	2,045 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500548
	3,353 hp	Diesel Engine, DOM: 2016			
L02	2,045 kW	Generator, Emergency	Marathon Electric	MTU16V4000DS2250	95030500549
	3,353 hp	Diesel Engine, DOM: 2016			

## 1.2 INSIGNIFICANT ACTIVITIES

The units in Table 1-2 are present at this source, but are insignificant activities pursuant to AQR 12.5.2.5. The emissions from these units or activities, when added to the PTE of the source, will not make the source major for any additional pollutant.

**Table 1-2: Summary of Insignificant Activities**

Rating	Quantity	Description
7,200 gallons	117	Aboveground Diesel Storage Tank
250 gallons	4	Aboveground Diesel Storage Tank
142 gallons	4	Aboveground Diesel Storage Tank
200 gallons	1	Aboveground Diesel Storage Tank

## 1.3 NONROAD ENGINES

Pursuant to Title 40, Part 1068.30 of the Code of Federal Regulations (40 CFR Part 1068.30), nonroad engines that are portable or transportable (i.e., not used on self-propelled equipment) shall not remain at a location for more than 12 consecutive months; otherwise, the engine(s) will constitute a stationary reciprocating internal combustion engine (RICE) and be subject to the applicable requirements of 40 CFR Part 63, Subpart ZZZZ; 40 CFR Part 60, Subpart IIII; and/or 40 CFR Part 60, Subpart JJJJ. Stationary RICE shall be permitted as emission units upon commencing operation at this stationary source. Records of location changes for portable or transportable nonroad engines shall be maintained, and shall be made available to the Control Officer upon request. These records are not required for engines owned and operated by a contractor for maintenance and construction activities as long as records are maintained demonstrating that such work took place at the stationary source for periods of less than 12 consecutive months.

Nonroad engines used on self-propelled equipment do not have this 12-month limitation or the associated recordkeeping requirements.



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## 2.0 CONTROLS

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### 2.1 CONTROL DEVICES

No add-on control devices have been identified.

### 2.2 CONTROL REQUIREMENTS

#### Diesel Engines/Fire Pumps

1. The permittee shall operate each diesel emergency generator with turbochargers and separate circuit air coolers (EUs: A02 through A29, A32 through A34, C01 through C24, C26 through C30, E01 through E18, G01 through G24, J01 through J18, L01, and L02). *[ATC 02/25/2015, Condition IV-B-1, and Application for a minor revision 04/05/2021]*
2. The permittee shall operate and maintain each diesel emergency generator and fire pump engine in accordance with the manufacturer's O&M manual for emissions-related components. A copy of the manufacturer's specifications shall be kept on site (EUs: A02 through A29, A32 through A34, C01 through C30, E01 through E20, G01 through G24, J01 through J19, L01, and L02). *[ATC 02/25/2015, Condition IV-B-2 & 40 CFR Part 60.4211(a)(1), and Application for a minor revision 04/05/2021]*
3. The permittee shall combust only diesel fuel in any diesel generator and fire pump engine. *[40 CFR Part 60.4207(b) & 40 CFR Part 63.6604]*
4. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in each emergency generator and fire pump (EUs: A02 through A29, A32 through A34, C01 through C30, E01 through E20, G01 through G24, J01 through J19, L01, and L02). *[40 CFR 60.4207(b)]*

#### Cooling Towers

5. The permittee shall operate each cooling tower with drift eliminators that have a manufacturer's maximum drift rate of 0.001 percent (EUs: B01 through B05, B07 through B21, B23, D01 through D08, D10 through D14, D16, F01 through F03, F05 through F07, F09 through F12, H01 through H04, H06 through H18, K01 through K03, K05 through K07, K09 through K11). *[ATC 02/25/2015, Condition IV-B-4 & ATC 06/27/2014, Condition IV-B-4]*
6. The permittee shall maintain the total dissolved solids (TDS) content of the circulation water in each cooling tower at or below 5,000 ppm (EUs: B01 through B05, B07 through B21, B23, D01 through D08, D10 through D14, D16, F01 through F03, F05 through F07, F09 through F12, H01 through H04, H06 through H18, K01 through K03, K05 through K07, K09 through K11). *[Title V OP(0701/2021)]*
7. The permittee shall operate and maintain all cooling towers in accordance with the manufacturer's O&M manual for emissions-related components (EUs: B01 through B05, B07 through B21, B23, D01 through D08, D10 through D14, D16, F01 through F03, F05

through F07, F09 through F12, H01 through H04, H06 through H18, K01 through K03, K05 through K07, K09 through K11). *[ATC 02/25/2015, Condition IV-B-6 & ATC 06/27/2014, Condition IV-B-6]*

8. No chromium-containing compounds shall be used for water treatment. *[ATC 02/25/2015, Condition IV-B-7 & ATC 06/27/2014, Condition IV-B-7]*

Other

9. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. *[AQR 40 & AQR 43]*

### 3.0 LIMITATIONS AND STANDARDS

#### 3.1 OPERATIONAL LIMITS

1. The permittee shall limit the operation of each emergency generator to 104 hours per consecutive 12-month period, including emergencies (EUs: A02 through A29, A32 through A34, C01 through C24, C26 through C30, E01 through E18, G01 through G24, J01 through J18, L01, and L02). *[ATC 02/25/2015, Condition IV-A-3(a), Title V OP(0701/2021), and Title V Application (16304\_20210405\_APP) incorporated into the Title V]*
2. The permittee shall limit the operation of each emergency generator (EUs: A02 through A29, A32 through A34, C01 through C24, C26 through C30, E01 through E18, G01 through G24, J01 through J18, L01, and L02) and each emergency fire pump (EUs: C25, E19, E20, and J19) for testing and maintenance purposes to 100 hours per calendar year. The permittee may operate the emergency generators and emergency fire pumps up to 50 hours per calendar year each for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. *[40 CFR Part 60.4211(f) and 40 CFR 63.6640(f)]*
3. The permittee shall not use the emergency generators for peak shaving or demand response (EUs: A02 through A29, A32 through A34, C01 through C24, C26 through C30, E01 through E18, G01 through G24, J01 through J18, L01, and L02). *[ATC 02/25/2015, Condition IV-A-3(b), Title V Application (16304\_20210405\_APP) incorporated into the Title V, and 40 CFR 63.6640(f)(3)]*

#### 3.2 EMISSION LIMITS

1. The permittee shall not allow actual emissions from the individual emission units to exceed the calculated PTE listed in Table 3-1 on a consecutive 12-month total. *[ATC 02/25/2015 Table III-A-1; ATC 06/27/2014; ATC 02/25/15; Part 70 OP 02/26/2016; Part 70 OP 11/27/2017; Part 70 OP 06/18/2018; Part 70 OP, 12/20/2018; Part 70 OP 06/24/2019; Title V OP(0701/2021); and Title V Application (16304\_20210405\_APP) incorporated into the Part 70 OP]*

**Table 3-1: Emission Unit PTE (tons per year)**

EU Type	Identical EUs Group <sup>1</sup>	Hours per Year	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP
3,353 hp Diesel engine (117 units)	A02-A29, A32-A34, C01-C24, E01-E18, G01-G24, J01-J18, L01, L02	104 each	0.02	0.02	2.06	0.27	0.01	0.03	0.01
1,250 gpm Cooling tower (69 units)	B01-B05, B07-B21, B23, D01- D08, D10-D14, D16, F01-F03, F05-F07, F09-F12, H01-H04, H06-H16, K01-K03, K05-K07, K09-K11	8,760 each	0.06	0.002	0	0	0	0	0
800 gal/min Cooling Tower (2 units)	H17, H18	8,760 each	0.04	0.0002	0	0	0	0	0
125 hp Diesel engine (3 units)	E19, E20, J19	500 each	0.01	0.01	0.19	0.09	0.01	0.01	0.01

EU Type	Identical EUs Group <sup>1</sup>	Hours per Year	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP
110 hp Diesel engine (1 unit)	C25	500	0.01	0.01	0.17	0.07	0.01	0.01	0.01
331 hp Diesel engine (1 unit)	C26	104	0.01	0.01	0.14	0.05	0.01	0.04	0.01
86 hp Diesel engine (2 units)	C27, C28	104	0.01	0.01	0.03	0.01	0.01	0.01	0.01
67 hp Diesel engine (1 units)	C29 , C30	104	0.01	0.01	0.02	0.01	0.01	0.01	0.01

<sup>1</sup> Each EU group consists of identical EUs with identical PTE.

Other

2. The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20% opacity for a period of more than six consecutive minutes. [AQR 26.1]

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## 4.0 COMPLIANCE DEMONSTRATION REQUIREMENTS

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### 4.1 MONITORING

#### Visible Emissions [AQR 12.5.2.6(d) & AQR 12.5.2.8]

1. The responsible official shall sign and adhere to the *Visible Emissions Check Guidebook* and keep a copy of the signed guide on-site at all times.
2. The permittee shall conduct a visual emissions check at least quarterly on each diesel-fired emergency generator and fire pump while in operation.
3. If no plume appears to exceed the opacity standard during the visible emissions check, the date, location, and results shall be recorded, along with the viewer's name.
4. If a plume appears to exceed the opacity standard, the permittee shall do one of the following:
  - a. Immediately correct the perceived exceedance, then record the first and last name of the person who performed the emissions check, the date the check was performed, the unit(s) observed, and the results of the observation; or
  - b. Call a certified Visible Emissions Evaluation (VEE) reader to perform a U.S. Environmental Protection Agency (EPA) Method 9 evaluation.
    - i. For sources required to have a certified reader on-site, the reader shall start Method 9 observations within 15 minutes of the initial observation. For all other sources, the reader shall start Method 9 observations within 30 minutes of the initial observation.
    - ii. If no opacity exceedance is observed, the certified VEE reader shall record the first and last name of the person who performed the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each emission unit that was initially perceived to have exceeded the opacity limit, and the record shall also indicate:
      - (1) The cause of the perceived exceedance;
      - (2) The color of the emissions; and
      - (3) Whether the emissions were light or heavy.
    - iii. If an opacity exceedance is observed, the certified VEE reader shall take immediate action to correct the exceedance. The reader shall then record the first and last name of the person performing the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each reading identified, and the record shall also indicate:
      - (1) The cause of the exceedance;
      - (2) The color of the emissions;

- (3) Whether the emissions were light or heavy;
  - (4) The duration of the emissions; and
  - (5) The corrective actions taken to resolve the exceedance.
5. Any scenario of visible emissions noncompliance can and may lead to enforcement action.
  6. Visible emissions checks do not require a certified observer unless the visible emissions appear to exceed the allowable opacity limit and to last more than 30 seconds, but an EPA Method 9 observation establishes that the emissions do not in fact exceed the standard.

*Diesel Engines/Fire Pumps [AQR 12.5.2.6(d) & AQR 12.5.2.8]*

7. The permittee shall operate each diesel engine and fire pump with a nonresettable hour meter and monitor the duration of operation for testing and maintenance, and separately for emergencies (EUs: A02 through A29, A32 through A34, C01 through C30, E01 through E20, G01 through G24, J01 through J19, L01, and L02).
8. The permittee shall monitor the average NO<sub>x</sub> emissions from the emergency generators (excluding EUs: C26 through C30) by testing at least 10 percent of the generator units each year, using a portable analyzer approved in advance by the Control Officer. *[ATC 02/25/2015, Condition V-A-6]*

*Cooling Towers [AQR 12.5.2.6(d) & AQR 12.5.2.8]*

9. The permittee shall monitor the TDS of the cooling tower recirculation water monthly, using a conductivity meter or other device approved in advance by the Control Officer (EUs: B01 through B05, B07 through B21, B23, D01 through D08, D10 through D14, D16, F01 through F03, F05 through F07, F09 through F12, H01 through H04, H06 through H18, K01 through K03, K05 through K07, K09 through K11).

## **4.2 TESTING**

1. Upon written request from the Control Officer, the permittee may be required to conduct performance testing on any emergency generator or fire pump engine to demonstrate compliance with the emission limits in 40 CFR Part 60, Subpart III. *[AQR 12.5.2.6(d)]*

## **4.3 RECORDKEEPING**

1. The permittee shall keep records of all inspections, maintenance, and repairs, as required by this permit. *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
2. The permittee shall comply with all applicable recordkeeping requirements of 40 CFR Part 60.7, 40 CFR Part 63 Subpart III, 40 CFR Part 63 Subpart ZZZZ, and any other applicable regulations.
3. All records, logs, etc., or copies thereof, shall be kept on-site for a minimum of five years from the date the measurement, or data was entered. *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
4. Records and data required by this permit to be maintained by the permittee may be audited at any time by a third party selected by the Control Officer. *[AQR 4.1]*

5. The permittee shall create and maintain the following records, at a minimum, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation. [AQR 12.5.2.6(d) & AQR 12.5.2.8]
6. The permittee shall maintain the following records for reporting: [AQR 12.5.2.6(d) & AQR 12.5.2.8]

### Diesel Engines

- a. Monthly, consecutive 12-month total operating hours for each diesel emergency engine and fire pump for testing, maintenance, and nonemergency use (EUs: A02 through A29, A32 through A34, C01 through C30, E01 through E20, G01 through G24, J01 through J19, L01, and L02);
- b. Monthly, consecutive 12-month total operating hours for each diesel emergency engine and fire pump for emergency use, including documentation justifying use during the emergency (EUs: A02 through A29, A32 through A34, C01 through C30, E01 through E20, G01 through G24, J01 through J19, L01, and L02); and
- c. Annual average of the portable NO<sub>x</sub> analyzer test results on the emergency generators generator (excluding EUs: C26 through C30) (reported semiannually);

### Other

- d. Deviations from permit requirements resulting in excess emissions (reported as required by Section 4.4);
  - e. Deviations from permit requirements not resulting in excess emissions (reported semiannually);
  - f. The calendar year annual emissions for each emission unit and the entire source (annual report only);
7. The permittee shall maintain the following records on site: [AQR 12.5.2.6(d) & AQR 12.5.2.8]
    - a. Dates and time when visible emissions checks were made, and the corrective steps taken to bring opacity into compliance;
    - b. Manufacturer's O&M manual for each emergency generator, fire pump, and cooling tower;

### Diesel Engines

- c. Date and duration of operation of each emergency generator and fire pump for testing, maintenance, and nonemergency use (EUs: A02 through A29, A32 through A34, C01 through C26 through C30, E01 through E20, G01 through G24, J01 through J19, L01, and L02);

- d. Date and duration of operation of each emergency generator and fire pump for emergency use, including documentation justifying use during the emergency (EUs: A02 through A29, A32 through A34, C01 through C26 through C30, E01 through E20, G01 through G24, J01 through J19, L01, and L02);
- e. Results of the portable NO<sub>x</sub> analyzer tests on each emergency generator (excluding EUs: C26 through C30) (reported semiannually);
- f. documentation verifying sulfur content of diesel fuel;

### Cooling Towers

- g. Monthly monitoring results of TDS content of cooling tower circulation water for each cooling tower (EUs: B01 through B05, B07 through B21, B23, D01 through D08, D10 through D14, D16, F01 through F03, F05 through F07, F09 through F12, H01 through H04, H06 through H18, K01 through K03, K05 through K07, and K09 through K11);

### Other

- h. Records of location changes for nonroad engines, if applicable;
- i. Equipment inspections and maintenance;
- j. records of location changes for nonroad engines, if applicable;
- k. log of visible emissions checks on all emission units to include the emergency generators and the fire pump; and
- l. the magnitude and duration of excess emissions, notifications, monitoring system performance, malfunctions, corrective actions taken, etc., as required by 40 CFR Part 60.7.

## **4.4 REPORTING AND NOTIFICATIONS**

1. The permittee shall certify compliance with the terms and conditions contained in this Part 70 OP, including emission limitations, standards, work practices, and the means for monitoring such compliance. [AQR 12.5.2.8(e)]
2. The permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W. Russell Road, Suite 200, Las Vegas, NV 89118) and the Region 9 Administrator (Director, Air and Radiation Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each calendar year will be due on January 30 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. These methods and means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements described in 40 CFR Part 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 Clean Air 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 (b) above. 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 was required and in which an excursion or exceedance, as defined under 40 CFR Part 64, occurred.
3. The permittee shall report to the Control Officer any startup, shutdown, malfunction, emergency, or deviation that causes emissions of regulated air pollutants in excess of any limits set by regulations or this permit. The report shall be in two parts, as specified below: *[AQR 12.5.2.6(d)(4)(B); AQR 25.6.1]*
    - a. Within 24 hours of the time the permittee learns of the excess emissions, the permittee shall notify DAQ by phone at (702) 455-5942, by fax at (702) 383-9994, or by email at [airquality@clarkcountynv.gov](mailto:airquality@clarkcountynv.gov).
    - b. Within 72 hours of the notification required by paragraph (a) above, the permittee shall submit a detailed written report to DAQ containing the information required by AQR 25.6.3.
  4. With the semiannual monitoring report, the permittee shall report to the Control Officer 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)]*
  5. The owner or operator of any source required to obtain a permit under AQR 12 shall report to the Control Officer emissions in excess of an applicable requirement or emission limit that pose a potential imminent and substantial danger to public health and safety or the environment as soon as possible, but no later than 12 hours after the deviation is discovered, and submit a written report within two days of the occurrence. *[AQR 25.6.2]*
  6. The permittee shall submit all compliance certifications to the U.S. Environmental Protection Agency (EPA) and to the Control Officer. *[AQR 12.5.2.8(e)(4)]*
  7. Any application form, report, or compliance certification submitted to the Control Officer pursuant to the permit or the AQRs, shall contain a certification by a responsible official, with an original signature, of truth, accuracy, and completeness. This certification, and any other 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)]*
  8. The permittee shall furnish to the Control Officer, in writing and within a reasonable time, any information that the Control Officer may request 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 that the permit requires keeping. The permittee may furnish records deemed confidential directly to the Administrator, along with a claim of confidentiality. [AQR 12.5.2.6(g)(5)]

9. At the Control Officer's request, the permittee shall provide any information or analyses that will disclose the nature, extent, quantity, or degree of air contaminants that are or may be discharged by the source, and the type or nature of control equipment in use. The Control Officer may require such disclosures be certified by a professional engineer registered in the state. In addition to this report, the Control Officer may designate an authorized agent to make an independent study and report on the nature, extent, quantity, or degree of any air contaminants that are or may be discharged from the source. An agent so designated may examine any article, machine, equipment, or other contrivance necessary to make the inspection and report. [AQR 4.1]
10. The permittee shall submit annual emissions inventory reports based on the following: [AQR 18.6.1 and AQR 12.5.2.4]
  - a. The annual emissions inventory must be submitted to DAQ by March 31 of each calendar year (if March 31 falls on a Saturday or Sunday, or on a Nevada or federal holiday, the submittal shall be due on the next regularly scheduled business day);
  - b. The calculated actual annual emissions from each emission unit shall be reported even if there was no activity, along with the total calculated actual annual emissions for the source based on the emissions calculation methodology used to establish the potential to emit (PTE) in the permit or an equivalent method approved by the Control Officer prior to submittal; and
  - c. As the first page of text, a signed certification containing the sentence: "I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate, and complete." This statement shall be signed and dated by a responsible official of the company (a sample form is available from DAQ).
11. Stationary sources that emit 25 tons or more of nitrogen oxide (NO<sub>x</sub>) and/or emit 25 tons or more of volatile organic compounds (VOC) from their emission units, insignificant activities, and exempt activities during a calendar year shall submit an annual emissions statement for both pollutants. Emissions statements must include actual annual NO<sub>x</sub> and VOC emissions from all activities, including emission units, insignificant activities and exempt activities. Emissions statements are separate from, and additional to, the calculated annual emissions reported each year for all regulated air pollutants (aka Emissions Inventory). [AQR 12.9.1]
12. The permittee shall submit to the Control Officer, within 15 days after commencing operation, any outstanding identification and/or description that was not previously available for new emission unit(s), as noted in this permit with "TBD." (Use this condition if there is emission unit information in the permit that is incomplete and noted with "TBD.")
13. The permittee shall comply with all applicable notification and reporting requirements of 40 CFR Part 60.7, 40 CFR Part 63 Subpart IIII, and 40 CFR Part 63 Subpart ZZZZ. [AQR 12.5.2.6(d)]

14. The permittee shall submit semiannual monitoring reports to DAQ. [AQR 12.5.2.6(d) & AQR 12.5.2.8]
15. The following requirements apply to semiannual reports: [AQR 12.5.2.6(d) & AQR 12.5.2.8]
  - a. The report shall include item listed in Section 4.3.6.
  - b. The report shall be based on a calendar semiannual period, which includes partial reporting periods.
  - c. The report shall be received by DAQ within 30 calendar days after the semiannual period.
16. Regardless of the date of issuance of this OP, the source shall comply with the schedule for report submissions outlined in Table 4-1. [AQR 12.5.2.6(d) & AQR 12.5.2.8]

**Table 4-1: Required Submission Dates for Various Reports**

Required Report	Applicable Period	Due Date
Semiannual report for 1 <sup>st</sup> six-month period	January, February, March, April, May, June	July 30 each year <sup>1</sup>
Semiannual report for 2 <sup>nd</sup> six-month period; any additional annual records required	July, August, September, October, November, December	January 30 each year <sup>1</sup>
Annual Compliance Certification	Calendar year	January 30 each year <sup>1</sup>
Annual Emissions Inventory Report	Calendar year	March 31 each year <sup>1</sup>
Annual Emissions Statement <sup>2</sup>	Calendar year	March 31 each year <sup>1</sup>
Notification of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission	As required	Within 24 hours of the permittee learns of the event
Excess Emissions that Pose a Potential Imminent and Substantial Danger	As Required	Within 12 hours of the permittee learns of the event
Performance Testing Protocol	As required	No less than 45 days, but no more than 90 days, before the anticipated test date <sup>1</sup>
Report of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission	As required	Within 72 hours of the notification
Deviation Report without Excess Emissions	As required	Along with semiannual reports <sup>1</sup>
Performance Testing	As required	Within 60 days of end of test <sup>1</sup>

<sup>1</sup>If the due date falls on a Saturday, Sunday, or federal or Nevada holiday, the submittal is due on the next regularly scheduled business day.

<sup>2</sup> Required only for stationary sources that emit 25 tons or more of nitrogen oxide (NO<sub>x</sub>) and/or emit 25 tons or more of volatile organic compounds (VOC) during a calendar year.

17. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit emission limits, applicable permit requirements, and requirements of applicable federal regulations. [AQR 4.1]

## **4.5 MITIGATION**

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

## 5.0 PERMIT SHIELD AND STREAMLINING

### Permit Shield

- The source has not requested a permit shield. [AQR 12.5.2.9]

### Streamlining

**Table 5-1: Streamlining Analysis**

EU	Regulation (40 CFR)	Regulatory Standard	Permit Limit	Is Permit Limit Equal or More Stringent?	Averaging Period Comparison			Streamlining Statement
					Standard	Permit Limit	Is Permit Limit Equal or More Stringent?	
A02-A29, A32-A34, C01-C24, C26-C30, E01-E18, G01-G24, J01-J18, L01, L02	60.4205(b) and 60.4211 (III)	Various limits for NOx, CO, PM, and VOC pollutants based on model year and engine power rating		Yes	Compliance demonstrated by keeping records of engine manufacturer's certified emissions data		Yes	The permit requirements and federal standards are identical
C25, E19, E20, J19	60.4205(c) and 60.4211 (III)	Various limits for NOx, CO, PM, and VOC pollutants based on model year and engine power rating		Yes	Compliance demonstrated by keeping records of engine manufacturer's certified emissions data		Yes	The permit requirements and federal standards are identical

## 6.0 OTHER REQUIREMENTS

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1. Replacement of failed engines associated with the emergency generators or fire pumps with identical engines (same manufacturer and model) requires notification prior to installation, but will not require a permit revision unless there is an emission rate increase from the replacement engines. *[AQR 12.5]*
2. Any person who violates any provision of the AQRs, 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 from DAQ is guilty of a civil offense and shall pay a civil penalty levied by the Air Pollution Control Hearing Board and/or the Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. *[AQR 9.1; NRS 445B.640]*
3. Any person aggrieved by an order issued pursuant to AQR 9.1 is entitled to review, as provided in Chapter 233B of the NRS. *[AQR 9.12]*
4. The permittee shall comply with the requirements of Title 40, Part 61 of the Code of Federal Regulations (40 CFR Part 61), Subpart M—the National Emission Standard for Asbestos—for all demolition and renovation projects. *[AQR 13.1(b)(8)]*
5. 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 Class I or Class II ozone-depleting substance or any nonexempt substitute refrigerant as a working fluid, unless such fluid has been approved for sale in such use by the EPA Administrator. The permittee shall keep records of all paperwork relevant to the applicable requirements of 40 CFR Part 82 on-site. *[40 CFR Part 82]*

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## 7.0 ADMINISTRATIVE REQUIREMENTS

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### 7.1 GENERAL

1. The permittee shall comply with all conditions of the Part 70 OP. Any permit noncompliance may constitute a violation of the Clark County Air Quality Regulations (AQRs), Nevada law, and the Clean Air Act, and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a 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 be unaffected and remain valid. *[AQR 12.5.2.6(f)]*
3. The permittee shall pay all permit fees pursuant to AQR 18. *[AQR 12.5.2.6(h)]*
4. This permit does not convey property rights of any sort, or any exclusive privilege. *[AQR 12.5.2.6(g)(4)]*
5. The permittee agrees to allow inspection of the premises to which this permit relates by any authorized representative of the Control Officer at any time during the permittee's hours of operation without prior notice. The permittee shall not obstruct, hamper, or interfere with any such inspection. *[AQR 4.1; AQR 5.1.1; AQR 12.5.2.8(b)]*
6. The permittee shall allow the Control Officer, upon presentation of credentials, to: *[AQR 4.1 & AQR 12.5.2.8(b)]*
  - a. Access and copy any records that must be kept under the conditions of the permit;
  - b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
  - c. Sample or monitor substances or parameters for the purpose of assuring compliance with the permit or applicable requirements; and
  - d. Document alleged violations using such devices as cameras or video equipment.
7. Any permittee who fails to submit relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit the needed 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 a complete application was filed but prior to release of a draft permit. A responsible official shall certify the additional information consistent with the requirements of AQR 12.5.2.4. *[AQR 12.5.2.2]*
8. Anyone issued a permit under AQR 12.5 shall post it in a location where it is clearly visible and accessible to facility employees and DAQ representatives. *[AQR 12.5.2.6(m)]*

9. 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 in order to maintain compliance with the conditions of this permit. *[AQR 12.5.2.6(g)(2)]*

## **7.2 MODIFICATION, REVISION, AND 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 (ATC) from the Control Officer. *[AQR 12.4.1.1(a)]*
2. The permit may be revised, revoked, reopened and reissued, or terminated for cause by the Control Officer. The filing of a request by the permittee for a 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. The permit shall be reopened under any of the following circumstances and when all applicable requirements pursuant to AQR 12.5.2.15 are met: *[AQR 12.5.2.15(a)]*
  - a. New applicable requirements become applicable to a stationary source considered “major” (per the definition in AQR 12.2, AQR 12.3, or 40 CFR Part 70.3(a)(1)) with a remaining permit term of three or more years;
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the Acid Rain Program;
  - c. The Control Officer or U.S. Environmental Protection Agency (EPA) determines that the permit contains a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
  - d. The EPA Administrator or the Control Officer determines that the permit must be revised or revoked to assure compliance with applicable requirements.
4. 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 a complete application need not be received before a Part 70 general permit is issued pursuant to AQR 12.5.2.20); and
  - b. The conditions of the permit provide for compliance with all applicable requirements and the requirements of AQR 12.5.
5. 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 that would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR Part 60.12]*
6. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit. *[AQR 12.5.2.6(i)]*



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)]*
8. For purposes of permit renewal, a timely application is a complete application that is submitted at least six months, but not more than 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 OP until final action is taken on its application for a renewed Part 70 OP. *[AQR 12.5.2.1(a)(2)]*

## 8.0 ATTACHMENTS

### 8.1 APPLICABLE REGULATIONS

#### Requirements Specifically Identified as Applicable

1. NRS, Chapter 445B.
2. Applicable AQRs listed in Table 8-1.

**Table 8-1: Applicable Clark County AQRs**

Citation	Title
AQR 0	"Definitions"
AQR 4	"Control Officer"
AQR 5	"Interference with Control Officer"
AQR 8	"Persons Liable for Penalties – Punishment: Defense"
AQR 9	"Civil Penalties"
AQR 12.0	"Applicability and General Requirements"
AQR 12.4	"Authority to Construct Application and Permit Requirements for Part 70 Sources"
AQR 12.5	"Part 70 Operating Permit Requirements"
AQR 12.9	"Annual Emissions Inventory Requirement"
AQR 13.2(b)(1)	"Subpart A - General Provisions"
AQR 13.2(b)(82)	"Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
AQR 14.1(b)(1)	"Subpart A – General Provisions"
AQR 14.1(b)(81)	"Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
AQR 18	"Permit and Technical Service Fees"
AQR 25	"Affirmative Defense for Excess Emissions due to Malfunctions, Startup, and Shutdown"
AQR 26	"Emission of Visible Air Contaminants"
AQR 28	"Fuel Burning Equipment"
AQR 40	"Prohibitions of Nuisance Conditions"
AQR 41	"Fugitive Dust", AQR 41.1.2 only
AQR 42	"Open Burning"
AQR 43	"Odors in the Ambient Air"
AQR 70	"Emergency Procedures"
AQR 80	"Circumvention"
AQR 94	"Permitting and Dust Control for Construction Activities"

3. Clean Air Act Amendments (42 U.S.C. § 7401, et seq.)
4. Applicable 40 CFR sections are listed in Table 8-2.

**Table 8-2: Federal Standards**

<b>Citation</b>	<b>Title</b>
40 CFR Part 52.21	"Prevention of significant deterioration of air quality"
40 CFR Part 52.1470	"Approval and Promulgation of Implementation Plans, Subpart DD—Nevada"
40 CFR Part 60, Subpart A	"General Provisions"
40 CFR Part 60, Subpart IIII	"Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
40 CFR Part 60	Appendix A, Method 9 or equivalent, (Opacity)
40 CFR Part 60, Appendix A-4	"Test Methods 6 through 10B" (Opacity)
40 CFR Part 63, Subpart A	"General Provisions"
40 CFR Part 63, Subpart ZZZZ	"National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
40 CFR Part 70	"State Operating Permit Programs"
40 CFR Part 82	"Protection of Stratospheric Ozone"