CLARK COUNTY
DEPARTMENT OF AIR QUALITY
4701 West Russell Road, Suite 200, Las Vegas, Nevada 89118
Major Part 70 Source
Authority to Construct
Source: 16539

Issued in accordance with the
Clark County Air Quality Regulations (AQR)

ISSUED TO: **Republic Services Renewable Energy, LLC**
770 East Sahara Avenue
Las Vegas, Nevada 89104

SOURCE: **Republic Services Renewable Energy, LLC**
13550 North Highway 93
Las Vegas, Nevada 89165

RESPONSIBLE OFFICIAL:

Name:	Ron Howley
Title:	Vice President of Operations
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Permit Issuance: Initial ATC: October 5, 2010
ATC Significant Revision: March 1, 2018

ISSUED BY: CLARK COUNTY DEPARTMENT OF AIR QUALITY

Marci D. Henson, Director
Clark County Department of Air Quality

SOURCE DESCRIPTION

Republic Services Renewable Energy (RSRE) is located within the boundaries of the Apex Waste Management site. The legal description of the source location is: portions of T18S, R63E, Section 24 in Apex Valley, County of Clark, State of Nevada. RSRE is situated in the Garnet Valley Hydrographic Basin 216. Garnet Valley is designated as attainment for all regulated air pollutants.

The source operates two 5.334 MW landfill gas turbines with Selective Catalytic Reduction (SCR) and one flare (with propane pilot fuel) for combustion of landfill gas (LFG) during the siloxane removal system regeneration cycle. The two gas turbines are subject to the regulatory requirements of 40 CFR Part 60, Subpart KKKK. The source is categorized under SIC Code 4911: Electrical Services and NAICS Code 221119: Other Electrical Power Generation. RSRE is a Major Part 70 Source for CO and is minor for PM_{10}, $PM_{2.5}$, NO_x, SO_2, VOC and HAP. The RSRE is a source of greenhouse gases (GHG). This ATC addresses the request to increase the sulfur concentration in the landfill gas from 100 ppm H_2S to 304 ppm total reduced sulfur (TRS) ,based on a consecutive 365 day average, which will result in an increase in Turbine SO_2 potential emissions.

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I. ACRONYMS

Table I-1: List of Acronyms and Abbreviations

Acronym	Term
Air Quality	Clark County Department of Air Quality
AQR	Clark County Air Quality Regulations
ATC	Authority to Construct Certificate or Authority to Construct
BHP	Brake Horse Power
CFR	United States Code of Federal Regulations
CO	Carbon Monoxide
EPA	United States Environmental Protection Agency
EU	Emission Unit
HAP	Hazardous Air Pollutant
H_2S	Hydrogen Sulfide
LFG	Landfill Gas
LHV	Lower Heat Value
MMBtu	Millions of British Thermal Units
MW	Molecular Weight
NAICS	North American Industry Classification System
NO_X	Nitrogen Oxides
OP	Operating Permit
PM_{10}	Particulate Matter less than 10 microns
ppm	Parts per Million
ppmv	Parts per Million Volume
PTE	Potential to Emit
scf	Standard Cubic Feet
SCR	Selective Catalytic Reduction
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
TRS	Total Reduced Sulfur
VE	Visible Emissions
VOC	Volatile Organic Compound

II. GENERAL CONDITIONS

A. ADMINISTRATIVE REQUIREMENTS

1. No person shall begin actual construction of a New Part 70 source, or modify or reconstruct an existing Part 70 source that falls within the preconstruction review applicability criteria, without first obtaining an Authority to Construct Permit from the Control Officer. *[AQR 12.4.1.1(a)]*
2. The Permittee shall post the permit in a location which is clearly visible and accessible to the facility's employees and representatives of the department. *[AQR 12.4.3.1(e) (16) and AQR 12.13]*
3. The Permittee shall commence the construction, modification, or reconstruction of this source within eighteen (18) months after the date of issuance of this Authority to Construct Permit and construction shall not discontinued for a period greater than twelve (12) months. *[AQR 12.4.1.1(b)]*
4. The Permittee shall submit an application for a Part 70 Operating Permit within twelve (12) months after commencing operation of the modification or reconstruction authorized by the ATC, or on or before such earlier date that the Control Officer may establish. However, where an existing Part 70 Operating Permit would prohibit such construction or change in operation, the source must obtain a Part 70 permit revision before commencing operation. *[AQR 12.5.2.1(a)(3)]*
5. This ATC does not convey any property rights or any exclusive privilege. *[AQR 12.4.3.1(e)(6)]*
6. The Permittee shall pay all fees assessed pursuant to AQR Section 18. *[AQR 12.4.3.1(e)(17)]*

B. MODIFICATION, REVISION, RENEWAL REQUIREMENTS

1. The Permittee shall file an application for a transfer of ownership at least 30 days prior to the date of a change in ownership or operational control of the source and such application shall constitute a temporary ATC under the conditions of the existing permit. *[AQR 12.12.2(c) and (d)]*
2. The Permittee shall file an application for any change in the Responsible Official of the source and may implement the change immediately upon submittal of the request. *[AQR 12.4.3.4(a)(1)(D) and AQR 12.4.3.4(a)(2)(C)]*
3. The Control Officer may revise, revoke and reissue, reopen and revise, or terminate the permit for cause. *[AQR 12.4.3.1 (e)(5)]*
4. The Control Officer reserves the right, upon reasonable cause, to modify existing conditions and impose additional new compliance, monitoring and control requirements. *[AQR 12.4.3.1(e)(10)(B) and (C)]*

C. REPORTING/NOTIFICATIONS/PROVIDING INFORMATION REQUIREMENTS

1. The Permittee shall comply with all applicable notification and reporting requirements of 40 CFR 60.7, 40 CFR 60, Subpart KKKK and other regulations. *[AQR 12.4.3.1(e)(10)(B)]*
2. The Permittee shall report start of construction, construction interruptions exceeding nine (9) months, and completion of construction to the Control Officer in writing not later than fifteen (15) working days after occurrence of the event. *[AQR 12.4.3.1(e)(12)]*

3. The Permittee shall provide written notification of the actual date of commencing operation of the source, or for any new emission unit or activity, received by the Control Officer, within fifteen (15) calendar days after such date. *[AQR 12.4.3.1(e)(13)]*

4. The Permittee shall provide separate written notification for commencing operation for each unit of phased construction, which may involve a series of units commencing operation at different times. *[AQR 12.4.3.1(e)(14)]*

5. The Permittee shall retain records of all required monitoring and performance demonstration data and supporting information for five (5) years after the date of the sample collection, measurement, report, or analysis. Supporting information includes all records regarding calibration and maintenance of the monitoring equipment, all original strip-chart recordings for continuous monitoring instrumentation, and if applicable, all other records required to be maintained pursuant to 40 CFR 64.9(b). *[AQR 12.4.3.1(e)(1)]*

6. The Permittee shall allow the Control Officer or any authorized representative of the Control Officer upon presentation of credentials to enter the Permittee's premises where the source is located or emissions related activity is conducted to: *[AQR 12.4.3.1(e)(8)]*

    a. Have access to and copy during normal business hours any records that are kept pursuant to the conditions of the permit;

    b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices or operations regulated or required under this permit;

    c. Sample or monitor substances or parameters to determine compliance with the conditions of the permit or applicable requirements; and

    d. Document alleged violations using devices such as cameras or video equipment.

7. The Permittee shall provide the Control Officer, within a reasonable time, with any information that the Control Officer requests in writing to determine whether cause exists for revising, revoking and reissuance or terminating the permit, or to determine compliance with the conditions of the permit. Upon request the Permittee shall also furnish to the Control Officer copies of any records required to be kept by the permit, or for information claimed to be confidential, the Permittee may furnish such records directly to the Administrator along with a claim of confidentiality. *[AQR 12.4.3.1(e)(7)]*

8. After the commencement of operation, the applicant shall submit semiannual reports within 30 days after the end of each six-month period. *[AQR 12.5.2.6(d)(4)(A)]*

9. Each semiannual report shall:

    a. 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 Air Quality);

    b. include semiannual summaries of permit deviations and unreported information related to items listed in V-C-2;

    c. be based on the six calendar months (including partial periods);

    d. be submitted within 30 days after the end of the reporting period; and

    e. be addressed to the attention of the Control Officer.

10. Each annual report shall be a summary of semiannual reports and shall be: *[AQR 12.4.3.1(e)(10)(B)]*

    a. 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 Air Quality);

    b. based on the preceding calendar year;

    c. contain the calculated actual annual emissions for each emission unit, even if there was no activity, and the total calculated actual annual emissions for the source;

    d. submitted on or before March 31 each year; and

    e. addressed to the attention of the Control Officer.

11. The Permittee shall report to the Control Officer (4701 West Russell Road, Suite 200**,** Las Vegas, Nevada 89118) any upset, breakdown, malfunction, emergency or deviation which cause emissions of regulated air pollutants in excess of any limits set by regulation or by this permit. The report shall be in two parts as specified below: *[AQR 25.6.1 and AQR 12.1.4.1(d)(3)(B)]*

    a. within twenty-four (24) hours of the onset of the event, the report shall be communicated by phone (702) 455-5942, fax (702) 383-9994, or email.

    b. within seventy-two (72) hours from the onset of the event, the detailed written report containing the information required by AQR Section 25.6.3 shall be submitted.

12. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit conditions, permit requirements, and requirements of applicable federal regulations. *[AQR 12.4.3.1(e)(10)(B)]*

D. COMPLIANCE REQUIREMENTS

1. The Permittee shall comply with all conditions contained in this ATC. Any noncompliance constitutes a violation and is grounds for an action for noncompliance, revocation and re-issuance or the termination of the permit by the Control Officer, or the reopening or revising of the permit by the Permittee as directed by the Control Officer. *[AQR 12.4.3.1(e)(3)]*

2. Each of the conditions and requirements of this permit are severable and if any are held invalid, the remaining conditions and requirements continue in effect. *[AQR 12.4.3.1(e)(2)]*

3. The need to halt or reduce activity to maintain compliance with the conditions of the permit is not a defense to noncompliance with any condition of the permit. *[AQR 12.4.3.1(e)(4)]*

4. The Permittee shall report to the Control Officer (4701 West Russell Road, Suite 200 – Second Floor, Las Vegas, Nevada 89118) upon the commencement of operation any upset, breakdown, malfunction, emergency or deviation which cause emissions of regulated air pollutants in excess of any limits set by regulation or by this permit. The report shall be in two parts as specified below *[AQR 12.5.2.6(d)(4)(B); AQR 25.6.1]*

    a. Within twenty-four (24) hours of the time the Permittee learns of the excess emissions, the report shall be communicated by phone (702) 455-5942, fax (702) 383-9994, or email: airquality@clarkcountynv.gov

    b. Within seventy-two (72) hours of the notification required by paragraph (a) above, the detailed written report containing the information required by AQR Section 25.6.3 shall be submitted.

5. The Permittee shall report to the Control Officer with the semi-annual monitoring report all deviations from permit conditions that do not result in excess emissions, including those attributable to malfunction, startup, or shutdown. Reports shall identify the probable cause of each deviation and any corrective actions or preventative measures taken. *[AQR 12.5.2.6(d)(4)(B)(iii)]*

6. A responsible official of the source shall certify that, based on information and belief formed after a reasonable inquiry, the statements made in any document required to be submitted by any condition of the permit are true, accurate, and complete. *[AQR 12.4.3.1(e)(9)]*

E. RECORDKEEPING

1. Records and data required by this permit and maintained by the Permittee may be audited, at the Permittee's expense, at any time by a third party selected by the Control Officer. *[AQR 4.4]*

2. All records and logs, or a copy thereof, shall be kept on site for a minimum of 5 years from the date the measurement or data was entered and shall be made available to the Control Officer upon request. *[AQR 12.4.3.1(e)(1)]*

3. The Control Officer reserves the right to require additional requirements concerning records and record keeping for this source. *[AQR 12.4.3.1(e)(10)(B)]*

III. SOURCE-WIDE STATUS SUMMARY

A. The source is a major Part 70 source of CO and a minor source of PM_{10}, $PM_{2.5}$, NO_X, SO_2, VOC, and HAP. Table III-A-1 lists the combined PTE of the emission units addressed in this ATC.

Table III-A-1: Potential to Emit

PM_{10}	$PM_{2.5}$	NO_x	CO	SO_2	VOC	HAP
13.32	13.32	63.23	129.20	51.78	18.47	0.84

IV. EMISSION UNITS AND APPLICABLE REQUIREMENTS

A. EMISSION UNITS

1. The stationary source covered by this ATC is defined to consist of the emission units and associated components summarized in Table IV-A-1. *[AQR 12.4.3.1(e)(10)]*

Table IV-A-1: List of Emission Units

EU	Description	Rating	Make	Model No.	Serial No.
A01	Gas Turbine Electrical Generating Package Simple Cycle	5.334 MW (66.4 MMBtu/hr)	Solar Taurus	60-7901	TG11146
A02	Gas Turbine Electrical Generating Package Simple Cycle	5.334 MW (66.4 MMBtu/hr)	Solar Taurus	60-7901	TG11147
A03	Landfill Gas Flare	4.0 MMBtu/hr	John Zink Co.	ZTOF	9108856

B. EMISSION LIMITS

1. 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. *[AQR 26.1.1]*
2. The Permittee shall not discharge in the atmosphere from the flare (EU: A03) any visible emissions except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. *[40 CFR 60.18(c)(1)]*
3. The Permittee shall not allow actual emissions from each emission unit to exceed the PTE listed in Table IV-B-1. The limits are for normal operation which excludes startup and shutdown. *[NSR ATC (10/05/10) and (05/19/14) and ATC Application (16539_20170215_APP)]*

Table IV-B-1: Emission Unit PTE, Excluding Startups and Shutdowns (pounds per hour)

EU	NO_x	CO
A01	7.50	15.20
A02	7.50	15.20

4. The Permittee shall not allow actual emissions from each emission unit to exceed the emission limits listed in Table IV-B-2. The limits are for normal operation which excludes startup and shutdown. *[NSR ATC (10/05/10) and (05/19/14) and ATC Application (16539_20170215_APP)]*

Table IV-B-2: Emission Concentrations Excluding Startup and Shutdown (@ 15% O_2)[1]

EU	NO_x	CO	SO_2
A01	24 ppmv	100 ppmv	0.15 lbs/MMBtu
A02	24 ppmv	100 ppmv	0.15 lbs/MMBtu

[1] NO_X and CO ppmv is the manufacturer guarantee. The SO_2 limit is based on a daily average per 40 CFR 60.4330(a)(3).

5. The Permittee shall not allow actual emission of SO_2 from the facility (EUs: A01, A02 and A03 combined) to exceed 19.2 lbs/hr. *[(16539_20180119_SUP)]*

C. PRODUCTION LIMITATIONS *[AQR 12.4.3.1 (a)(1)]*

1. The Permittee shall limit the combined hours of operation of the two turbines (EUs: A01 and A02) to 16,644 hours per year (based on rolling 12-month period). *[NSR ATC (10/05/10)]*
2. The Permittee shall limit the combined volume of fuel flow of the two turbines (EUs: A01 and A02) to 238,988 ft^3 per hour. *[Part 70 OP Minor Revision (08/28/2015)]*
3. The Permittee shall limit the duration of each startup event to 10 minutes. Startup shall be defined as the period beginning with ignition and lasting until a turbine has reached a continuous and stable operating level and the catalyst has reached 540°F. *[NSR ATC (10/05/10)]*
4. The Permittee shall limit the duration of each shutdown event to 10 minutes. Shutdown shall be defined as the period beginning with the lowering of the electric load of a turbine below 50 percent of nameplate capacity and ending when combustion has ceased. *[NSR ATC (10/05/10)]*

5. The Permittee shall limit hours of operation for the flare (EU: A03) to 6,750 hours per year (based on consecutive 12-month total). *[NSR ATC (05/19/14)]*

6. The Permittee shall limit the fuel flow to the flare (EU: A03) to 9,000 ft^3 per hour. *[NSR ATC (05/19/14)]*

D. CONTROL REQUIREMENTS

General

1. The Permittee shall operate and maintain all emission units (EUs: A01, A02 and A03) in accordance with manufacturer's recommendations for good combustion practices. *[40 CFR 70.5(c)(3)(iv)]*

2. The Permittee shall only combust LFG in each turbine (EUs: A01 and A02) and the flare (EU: A03) with a daily TRS content less than 304 ppmv based on a consecutive 365 day average. *[ATC Application (16539_20170215_APP)]*

Turbines

3. The Permittee shall operate each turbine (EUs: A01 and A02) with 'SoLoNO$_x$' combustion technology. *[NSR ATC (05/19/14)]*

4. The Permittee shall operate each turbine (EUs: A01 and A02) with a SCR control device at all times the associated turbine units are operating, excluding periods of startup and shutdown. *[NSR ATC (05/19/14)]*

5. The Permittee shall operate each SCR system to achieve a minimum of 30 percent control efficiency for NO_X removal (EUs: A01 and A02). *[NSR ATC (05/19/14)]*

6. The Permittee shall control PM_{10} emissions by maintaining and periodically replacing inlet air filters preceding each turbine (EUs: A01 and A02) per the manufacturer's recommendations for good operating practice. *[NSR ATC (05/19/14)]*

7. The Permittee shall construct the stack height(s) for the combustion turbines (EUs: A01 and A02) to meet the requirements of AQR 12.2.7.3(b)(4) with a height of 35 feet (10.67 meters) and a diameter of 6.25 feet (1.91 meters). *[AQR 12.2.7.3]*

8. The Permittee shall operate the flare (EU: A03) at a temperature of 1,600°F or greater except during startup or shutdown. *[NSR ATC (05/19/14)]*

V. PROVISIONAL OPERATING CONDITIONS

The provisional operating conditions in this ATC are enforceable conditions for the affected emission units addressed in the ATC until the Title V operating permit is revised and issued.

A. MONITORING

Visible Emissions *[AQR 12.4.3.1(a)(7)]*

1. The Permittee shall conduct a weekly visual emissions check for visible emissions from the facility while it is in operation.

2. If the Permittee, during the visible emissions check, does not see any plume that, on an instantaneous basis, appears to exceed the opacity standard, then the observer shall keep a record of the name of the observer, the date on which the observation was made, the location, and the results of the observation.

3. If the Permittee sees a plume that, on an instantaneous basis, appears to exceed the opacity standard, the Permittee shall:

   a. take immediate action to correct causes of fugitive/stack emissions that appear to exceed allowable opacity limits; or

   b. if practical, have a certified VE observer take an EPA Method 9 observation of the plume and record the results, and take immediate action to correct causes of fugitive emissions in excess of allowable opacity limits in accordance with 40 CFR 60 Appendix A: Reference Method 9.

4. Visible emissions checks do not require a certified VE observer, except where visible emissions appear to exceed the allowable opacity limit and exceed 30 seconds in duration, and an EPA Method 9 observation is made to establish it does not exceed the standard.

Landfill Gas *[NSR ATC (05/19/14)]*

5. The Permittee shall monitor the H_2S content of the fuel consistent with the LFG fuel sulfur monitoring plan developed by the source pursuant to the methods described in 40 CFR 60.4370(b) or (c) (see Attachment 1)

6. If the Process Gas Chromatograph is out of service for more than 12 hours per operating day, the Permittee shall:

   a. notify Air Quality, in writing, within 24 hours of the start of the instrument's malfunction; and

   b. determine the sulfur content of the LFG using a hand-held H_2S draeger tube or data substitution method, at least once per operating day until the Process Gas Chromatograph is back in service.

7. The Permittee shall conduct a monthly fuel analysis and determine the ratio of TRS/H_2S in the fuel. *[(16935_20180119_SUP)]*

8. The Permittee shall determine fuel TRS content using the measured H_2S content and the calculated TRS/H_2S ratio to demonstrate compliance with the fuel sulfur limit identified in condition IV-D-2. *[(16935_20180119_SUP)]*

9. The Permittee shall calculate SO_2 emissions to demonstrate compliance with condition IV-B-5. As an alternative to this SO_2 emissions limit, the Permittee may determine fuel TRS content using the measured H_2S content and the calculated TRS/H_2S ratio to demonstrate the fuel sulfur limit is below 463.4 ppm TRS on a one-hour average. *[(16935_20180119_SUP)]*

10. The Permittee shall install a nonresettable fuel flow meter for each turbine (EUs: A01 and A02) and shall monitor and record the LFG fuel flow rate of each emission unit to demonstrate compliance with the limit on fuel consumption. *[AQR 12.4.3.1(a)(2)]*

11. The Permittee shall determine the hourly heat input rate (MMBtu/hr) for each turbine from the LFG flow (ft^3/hr or lbs/hr) and fuel heating value (Btu/lb or Btu/ft^3) to demonstrate compliance with the SO_2 limit identified in condition IV-B-4. *[(16935_20180119_SUP)]*

Turbines (EUs: A01 and A02) *[NSR ATC (05/19/14)]*

12. The Permittee shall define excess emissions and monitoring downtime for SO_2 in accordance with 40 CFR 60.4385. (see Attachment 1).

13. The Permittee shall maintain logs of the maintenance and replacement of the inlet air filters for each turbine (EUs: A01 and A02). *[AQR 12.4.3.1(e)(10)]*

14. The Permittee shall install a non-resettable hour meter for each turbine (EUs: A01 and A02) and shall monitor and record the hours of operation for each turbine. *[AQR 12.4.3.1(e)(10)]*

Flare (EU: A03) *[NSR ATC (05/19/14)]*

15. The Permittee shall demonstrate compliance with 40 CFR 60.18(c)(1) by conducting an EPA Method 22 at least quarterly or whenever the flare is operated if no operation occurred during a calendar quarter. *[AQR 12.4.3.1(e)(10)]*

16. The Permittee shall install a non-resettable hour meter on the flare to monitor and record the hours of operation to demonstrate compliance with the hourly limits on the flare operation. *[AQR 12.4.3.1(e)(10)]*

17. The Permittee shall equip the flare with a temperature sensing/recording device to demonstrate compliance with the temperature limits of this permit. *[AQR 12.4.3.1(e)(10)]*

18. The Permittee shall monitor the presence of a flare pilot flame using a thermocouple or any other equivalent device to detect the presence of a flame. *[AQR 12.4.3.1(e)(10)]*

B. TESTING

1. Performance testing for the turbine units (EUs: A01 and A02) is subject to 40 CFR Part 60, Subpart A 40 CFR 60.8; 40 CFR Part 60, Subpart KKKK and Air Quality Guideline on Performance Testing, as amended. *[AQR 12.4.3.1(a)(9) and 40 CFR 60.4400]*

2. The Permittee shall submit for approval a performance testing protocol which contains testing, reporting, and notification schedules, test protocols, and anticipated test dates to the Control Officer not less than 45 nor more than 90 days prior to the anticipated date of the performance test. *[NSR ATC (05/19/14)]*

3. The Permittee shall conduct initial performance testing on the turbine units (EUs: A01 and A02) consistent with the pollutants and methods listed in Table V-B-1. *[NSR ATC (05/19/14)]*

Table V-B-1: Performance Testing Requirements (40 CFR Part 60, Appendix A)

Test Point	Pollutant	Method
Turbine Exhaust Stack	NO_X	Chemiluminescence Analyzer (EPA Method 7E)
Turbine Exhaust Stack	CO	EPA Method 10 analyzer
Turbine Exhaust Stack	Opacity	EPA Method 9
Turbine Exhaust Stack	SO_2	Pursuant to 40 CFR Part 60, Subpart KKKK §60.4415
Stack Gas Parameters	---	EPA Methods 1, 2, 3, 4

4. The Permittee shall conduct a fuel analysis for sulfur content annually, but no more than 14 calendar months apart, consistent with the requirements of 40 CFR 60.4415(a)(1). *[AQR 12.4.3.1(a)(9) and 40 CFR 60.4415]*

5. The Permittee shall conduct subsequent performance testing for NO_x and CO on turbine units (EUs: A01 and A02) every year, consistent with the pollutants and methods listed in Table V-B-1. *[NSR ATC (05/19/14)]*

6. The Permittee shall submit a complete and comprehensive final performance test report to the Control Officer within 60 days from the end of each performance test. *[NSR ATC (05/19/14)]*

7. The Control Officer may require additional or more frequent performance testing. *[AQR 4.5]*

C. RECORD KEEPING

1. The Permittee shall comply with all applicable record keeping requirements of 40 CFR 60.7; 40 CFR Part 60, Subpart KKKK; and any other applicable regulations.
2. The Permittee shall maintain the following records onsite for reporting: *[AQR 12.4.3.1(e)(10)(B)]*
    a. monthly and consecutive 12-month total hours of operation for each emission unit;
    b. monthly and consecutive 12-month total emissions calculated for each emission unit, including turbine startups and shutdowns;
    c. logs of the consecutive 365 daily average TRS content of the LFG fuel;
    d. logs of the hourly average TRS content of the LFG fuel;
    e. records of hourly SO_2 emissions in lbs/hr, for the facility;
    f. records of hourly SO_2 emissions in lbs/MMBtu, per turbine;
    g. consecutive 12-month total quantity of LFG consumed in each gas turbine; and
    h. consecutive 12-month total quantity of LFG consumed by the flare.
3. The Permittee shall maintain records on site that include, at a minimum: *[AQR 12.4.3.1(e)(10)(B)]*
    a. logs of opacity observations with date and time of each observation, with any corrective action that was required;
    b. logs of hourly LFG fuel flow, recorded in pounds per hour or cubic feet per hour, and reported in cubic feet per hour, for each turbine (EUs: A01 and A02);
    c. LFG analysis for fuel heating value (Btu/ft^3), density (lbs/ft^3), and MW (lb/lb-mole);
    d. records of monthly LFG analysis for concentrations (ppmv) of sulfur compounds, molecular weight of TRS, and TRS to SO_2 mole conversion factor;
    e. logs of maintenance and replacement of inlet air filters for each turbine (EUs: A01 and A02);
    f. copies of all reports, compliance certifications, other submissions;
    g. dates, times, and duration of each startup and shutdown cycle;
    h. the magnitude and duration of excess emissions, notifications, malfunctions, corrective actions taken, etc., as required by 40 CFR 60.7; and
    i. performance test results

D. REPORTING

1. All report submissions shall be addressed to the attention of the Control Officer. *[AQR 14.1(b)]*
2. All reports shall contain the following: *[AQR 12.4.3.1(e)(10)(B)]*
    a. A certification statement on the first page, i.e., “I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate and complete.” (A sample form is available from Air Quality); and
    b. A certification signature from a responsible official of the company and the date of certification.

3. The Permittee shall submit semi-annual monitoring reports to Air Quality. *[AQR 12.4.3.1(e)(10)(B)]*
4. The following requirements apply to semi-annual reports: *[AQR 12.4.3.1(e)(10)(B)]*
   a. The report shall include a semi-annual summary of each item listed in Section V-C-2.
   b. The report shall be based on a calendar semi-annual period, which includes partial reporting periods.
   c. The report shall be received by Air Quality within 30 calendar days after the semi-annual period.
5. Regardless of the date of issuance of this ATC, the source shall comply with the schedule for report submissions outlined in Table V-D-1: *[AQR 12.4.3.1(e)(10)(B)]*

Table V-D-1: Required Submission Dates for Various Reports

Required Report	Applicable Period	Due Date
Semi-annual Report for 1st Six-Month Period	January, February, March, April, May, June	July 30th each year[1]
Semi-annual Report for 2nd Six-Month Period, Any additional annual records required.	July, August, September, October, November, December	January 30th each year[1]
Annual Emission Inventory Report	Calendar Year	March 31st each year[1]
Notification of Malfunctions, Startup, Shutdowns or Deviations with Excess Emission	As Required	Within 24 hours of the Permittee learns of the event
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 semi-annual reports[1]
Performance Testing	As Required	Within 60 days from the end of the test[1]

[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.

6. The Permittee shall submit annual emissions inventory reports based on the following*: [AQR 18.6.1]*
   a. The annual emissions inventory must be submitted to Air Quality by March 31st of each calendar year; and
   b. The report shall include the emission factors and calculations used to determine the emissions from each permitted emission unit, even when an emission unit is not operated.
7. The Permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W Russell Road, Suite 200, Las Vegas, Nevada 89118) and the Administrator at EPA Region IX (Director, Air and Toxics Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each year will be due on or before January 30 of the following year. *[AQR 25.6.1]*
8. 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 4.4]*

E. MITIGATION

1. There are no Federal offset requirements for this ATC.

ATTACHMENT 1 - APPLICABLE REGULATIONS EXCERPTS

Excerpts from Subpart KKKK – Standards of Performance for Stationary Combustion Turbines
§60.4360 How do I determine the total sulfur content of the turbine's combustion fuel?

You must monitor the total sulfur content of the fuel being fired in the turbine, except as provided in §60.4365. The sulfur content of the fuel must be determined using total sulfur methods described in §60.4415. Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than half the applicable limit, ASTM D4084, D4810, D5504, or D6228, or Gas Processors Association Standard 2377 (all of which are incorporated by reference, see §60.17), which measure the major sulfur compounds, may be used.

§60.4365 How can I be exempted from monitoring the total sulfur content of the fuel?

You may elect not to monitor the total sulfur content of the fuel combusted in the turbine, if the fuel is demonstrated not to exceed potential sulfur emissions of 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input for units located in continental areas and 180 ng SO_2/J (0.42 lb SO_2/MMBtu) heat input for units located in noncontinental areas or a continental area that the Administrator determines does not have access to natural gas and that the removal of sulfur compounds would cause more environmental harm than benefit. You must use one of the following sources of information to make the required demonstration:

(a) The fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content for oil use in continental areas is 0.05 weight percent (500 ppmw) or less and 0.4 weight percent (4,000 ppmw) or less for noncontinental areas, the total sulfur content for natural gas use in continental areas is 20 grains of sulfur or less per 100 standard cubic feet and 140 grains of sulfur or less per 100 standard cubic feet for noncontinental areas, has potential sulfur emissions of less than less than 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input for continental areas and has potential sulfur emissions of less than less than 180 ng SO_2/J (0.42 lb SO_2/MMBtu) heat input for noncontinental areas; or

(b) Representative fuel sampling data which show that the sulfur content of the fuel does not exceed 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input for continental areas or 180 ng SO_2/J (0.42 lb SO_2/MMBtu) heat input for noncontinental areas. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of this chapter is required.

§60.4415 How do I conduct the initial and subsequent performance tests for sulfur?

(a) You must conduct an initial performance test, as required in §60.8. Subsequent SO_2 performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test). There are three methodologies that you may use to conduct the performance tests.

(1) If you choose to periodically determine the sulfur content of the fuel combusted in the turbine, a representative fuel sample would be collected following ASTM D5287 (incorporated by reference, see §60.17) for natural gas or ASTM D4177 (incorporated by reference, see §60.17) for oil. Alternatively, for oil, you may follow the procedures for manual pipeline sampling in section 14 of ASTM D4057 (incorporated by reference, see §60.17). The fuel analyses of this section may be performed either by you, a service contractor retained by you, the fuel vendor, or any other qualified agency. Analyze the samples for the total sulfur content of the fuel using:

(i) For liquid fuels, ASTM D129, or alternatively D1266, D1552, D2622, D4294, or D5453 (all of which are incorporated by reference, see §60.17); or

(ii) For gaseous fuels, ASTM D1072, or alternatively D3246, D4084, D4468, D4810, D6228, D6667, or Gas Processors Association Standard 2377 (all of which are incorporated by reference, see §60.17).

(2) Measure the SO_2 concentration (in parts per million (ppm)), using EPA Methods 6, 6C, 8, or 20 in appendix A of this part. In addition, the American Society of Mechanical Engineers (ASME) standard, ASME PTC 19-10-1981-Part 10, "Flue and Exhaust Gas Analyses," manual methods for sulfur dioxide (incorporated by reference, see §60.17) can be used instead of EPA Methods 6 or 20. For units complying with the output based standard, concurrently measure the stack gas flow rate, using EPA Methods 1 and 2 in appendix A of this part, and measure and record the electrical and thermal output from the unit. Then use the following equation to calculate the SO_2 emission rate:

$$E = \frac{1.664 \times 10^{-7} * (SO_2)_c * Q_{std}}{P} \qquad (Eq. 6)$$

Where:

E = SO_2 emission rate, in lb/MWh

1.664×10^{-7} = conversion constant, in lb/dscf-ppm

$(SO_2)_c$ = average SO_2 concentration for the run, in ppm

Q_{std} = stack gas volumetric flow rate, in dscf/hr

P = gross electrical and mechanical energy output of the combustion turbine, in MW (for simple-cycle operation), for combined-cycle operation, the sum of all electrical and mechanical output from the combustion and steam turbines, or, for combined heat and power operation, the sum of all electrical and mechanical output from the combustion and steam turbines plus all useful recovered thermal output not used for additional electric or mechanical generation, in MW, calculated according to §60.4350(f)(2); or

(3) Measure the SO_2 and diluent gas concentrations, using either EPA Methods 6, 6C, or 8 and 3A, or 20 in appendix A of this part. In addition, you may use the manual methods for sulfur dioxide ASME PTC 19-10-1981-Part 10 (incorporated by reference, see §60.17). Concurrently measure the heat input to the unit, using a fuel flowmeter (or flowmeters), and measure the electrical and thermal output of the unit. Use EPA Method 19 in appendix A of this part to calculate the SO_2 emission rate in lb/MMBtu. Then, use Equations 1 and, if necessary, 2 and 3 in §60.4350(f) to calculate the SO_2 emission rate in lb/MWh.

§60.4370 How often must I determine the sulfur content of the fuel?

The frequency of determining the sulfur content of the fuel must be as follows:

(b) *Gaseous fuel.* If you elect not to demonstrate sulfur content using options in §60.4365, and the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel must be determined and recorded once per unit operating day.

(c) *Custom schedules.* Notwithstanding the requirements of paragraph (b) of this section, operators or fuel vendors may develop custom schedules for determination of the total sulfur content of gaseous fuels, based on the design and operation of the affected facility and the characteristics of the fuel supply. Except as provided in paragraphs (c)(1) and (c)(2) of this section, custom schedules shall be substantiated with data and shall be approved by the Administrator before they can be used to comply with the standard in §60.4330.

(1) The two custom sulfur monitoring schedules set forth in paragraphs (c)(1)(i) through (iv) and in paragraph (c)(2) of this section are acceptable, without prior Administrative approval:

(i) The owner or operator shall obtain daily total sulfur content measurements for 30 consecutive unit operating days, using the applicable methods specified in this subpart. Based on the results of the 30 daily samples, the required frequency for subsequent monitoring of the fuel's total sulfur content shall be as specified in paragraph (c)(1)(ii), (iii), or (iv) of this section, as applicable.

(ii) If none of the 30 daily measurements of the fuel's total sulfur content exceeds half the applicable standard, subsequent sulfur content monitoring may be performed at 12-month intervals. If any of the samples taken at 12-month intervals has a total sulfur content greater than half but less than the applicable limit, follow the procedures in paragraph (c)(1)(iii) of this section. If any measurement exceeds the applicable limit, follow the procedures in paragraph (c)(1)(iv) of this section.

(iii) If at least one of the 30 daily measurements of the fuel's total sulfur content is greater than half but less than the applicable limit, but none exceeds the applicable limit, then:

(A) Collect and analyze a sample every 30 days for 3 months. If any sulfur content measurement exceeds the applicable limit, follow the procedures in paragraph (c)(1)(iv) of this section. Otherwise, follow the procedures in paragraph (c)(1)(iii)(B) of this section.

(B) Begin monitoring at 6-month intervals for 12 months. If any sulfur content measurement exceeds the applicable limit, follow the procedures in paragraph (c)(1)(iv) of this section. Otherwise, follow the procedures in paragraph (c)(1)(iii)(C) of this section.

(C) Begin monitoring at 12-month intervals. If any sulfur content measurement exceeds the applicable limit, follow the procedures in paragraph (c)(1)(iv) of this section. Otherwise, continue to monitor at this frequency.

(iv) If a sulfur content measurement exceeds the applicable limit, immediately begin daily monitoring according to paragraph (c)(1)(i) of this section. Daily monitoring shall continue until 30 consecutive daily samples, each having a sulfur content no greater than the applicable limit, are obtained. At that point, the applicable procedures of paragraph (c)(1)(ii) or (iii) of this section shall be followed.

(2) The owner or operator may use the data collected from the 720-hour sulfur sampling demonstration described in section 2.3.6 of appendix D to part 75 of this chapter to determine a custom sulfur sampling schedule, as follows:

(i) If the maximum fuel sulfur content obtained from the 720 hourly samples does not exceed 20 grains/100 scf, no additional monitoring of the sulfur content of the gas is required, for the purposes of this subpart.

(ii) If the maximum fuel sulfur content obtained from any of the 720 hourly samples exceeds 20 grains/100 scf, but none of the sulfur content values (when converted to weight percent sulfur) exceeds half the applicable limit, then the minimum required sampling frequency shall be one sample at 12 month intervals.

(iii) If any sample result exceeds half the applicable limit, but none exceeds the applicable limit, follow the provisions of paragraph (c)(1)(iii) of this section.

(iv) If the sulfur content of any of the 720 hourly samples exceeds the applicable limit, follow the provisions of paragraph (c)(1)(iv) of this section.

§60.4400 How do I conduct the initial and subsequent performance tests, regarding NO_X?

(a) You must conduct an initial performance test, as required in §60.8. Subsequent NO_x performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test).

(1) There are two general methodologies that you may use to conduct the performance tests. For each test run:

(i) Measure the NO_x concentration (in parts per million (ppm)), using EPA Method 7E or EPA Method 20 in appendix A of this part. For units complying with the output based standard, concurrently measure the stack gas flow rate, using EPA Methods 1 and 2 in appendix A of this part, and measure and record the electrical and thermal output from the unit. Then, use the following equation to calculate the NO_x emission rate:

$$E = \frac{1.194 \times 10^{-7} * (NO_x)_c * Q_{std}}{P} \qquad (Eq. 5)$$

Where:

E = NO_x emission rate, in lb/MWh

1.194×10^{-7} = conversion constant, in lb/dscf-ppm

$(NO_x)_c$ = average NO_x concentration for the run, in ppm

Q_{std} = stack gas volumetric flow rate, in dscf/hr

P = gross electrical and mechanical energy output of the combustion turbine, in MW (for simple-cycle operation), for combined-cycle operation, the sum of all electrical and mechanical output from the combustion and steam turbines, or, for combined heat and power operation, the sum of all electrical and mechanical output from the combustion and steam turbines plus all useful recovered thermal output not used for additional electric or mechanical generation, in MW, calculated according to §60.4350(f)(2); or

(ii) Measure the NO_x and diluent gas concentrations, using either EPA Methods 7E and 3A, or EPA Method 20 in appendix A of this part. Concurrently measure the heat input to the unit, using a fuel flowmeter (or flowmeters), and measure the electrical and thermal output of the unit. Use EPA Method 19 in appendix A of this part to calculate the NO_x emission rate in lb/MMBtu. Then, use Equations 1 and, if necessary, 2 and 3 in §60.4350(f) to calculate the NO_x emission rate in lb/MWh.

(2) Sampling traverse points for NO_x and (if applicable) diluent gas are to be selected following EPA Method 20 or EPA Method 1 (non-particulate procedures), and sampled for equal time intervals. The sampling must be performed with a traversing single-hole probe, or, if feasible, with a stationary multi-hole probe that samples each of the points sequentially. Alternatively, a multi-hole probe designed and documented to sample equal volumes from each hole may be used to sample simultaneously at the required points.

(3) Notwithstanding paragraph (a)(2) of this section, you may test at fewer points than are specified in EPA Method 1 or EPA Method 20 in appendix A of this part if the following conditions are met:

(i) You may perform a stratification test for NO_x and diluent pursuant to

(A) [Reserved], or

(B) The procedures specified in section 6.5.6.1(a) through (e) of appendix A of part 75 of this chapter.

(ii) Once the stratification sampling is completed, you may use the following alternative sample point selection criteria for the performance test:

(A) If each of the individual traverse point NO_x concentrations is within ±10 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than ±5ppm or ±0.5 percent CO_2 (or O_2) from the mean for all traverse points, then you may use three points (located either 16.7, 50.0 and 83.3 percent of the way across the stack or duct, or, for circular stacks or ducts greater than 2.4 meters (7.8 feet) in diameter, at 0.4, 1.2, and 2.0 meters from the wall). The three points must be located along the measurement line that exhibited the highest average NO_x concentration during the stratification test; or

(B) For turbines with a NO_x standard greater than 15 ppm @ 15% O_2, you may sample at a single point, located at least 1 meter from the stack wall or at the stack centroid if each of the individual traverse point NO_x concentrations is within ±5 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than ±3ppm or ±0.3 percent CO_2 (or O_2) from the mean for all traverse points; or

(C) For turbines with a NO_x standard less than or equal to 15 ppm @ 15% O_2, you may sample at a single point, located at least 1 meter from the stack wall or at the stack centroid if each of the individual traverse point NO_x concentrations is within ±2.5 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than ±1ppm or ±0.15 percent CO_2 (or O_2) from the mean for all traverse points.

(b) The performance test must be done at any load condition within plus or minus 25 percent of 100 percent of peak load. You may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice. You must conduct three separate test runs for each performance test. The minimum time per run is 20 minutes.

(1) If the stationary combustion turbine combusts both oil and gas as primary or backup fuels, separate performance testing is required for each fuel.

(2) For a combined cycle and CHP turbine systems with supplemental heat (duct burner), you must measure the total NO_x emissions after the duct burner rather than directly after the turbine. The duct burner must be in operation during the performance test.

(3) If water or steam injection is used to control NO_x with no additional post-combustion NO_x control and you choose to monitor the steam or water to fuel ratio in accordance with §60.4335, then that monitoring system must be operated concurrently with each EPA Method 20 or EPA Method 7E run and must be used to determine the fuel consumption and the steam or water to fuel ratio necessary to comply with the applicable §60.4320 NO_x emission limit.

(4) Compliance with the applicable emission limit in §60.4320 must be demonstrated at each tested load level. Compliance is achieved if the three-run arithmetic average NO_x emission rate at each tested level meets the applicable emission limit in §60.4320.

(5) If you elect to install a CEMS, the performance evaluation of the CEMS may either be conducted separately or (as described in §60.4405) as part of the initial performance test of the affected unit.

(6) The ambient temperature must be greater than 0 °F during the performance test.

§60.4385 How are excess emissions and monitoring downtime defined for SO_2?

If you choose the option to monitor the sulfur content of the fuel, excess emissions and monitoring downtime are defined as follows:

(a) For samples of gaseous fuel and for oil samples obtained using daily sampling, flow proportional sampling, or sampling from the unit's storage tank, an excess emission occurs each unit operating hour included in the period beginning on the date and hour of any sample for which the sulfur content of the fuel being fired in the combustion turbine exceeds the applicable limit and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit.

(b) If the option to sample each delivery of fuel oil has been selected, you must immediately switch to one of the other oil sampling options (i.e., daily sampling, flow proportional sampling, or sampling from the unit's storage tank) if the sulfur content of a delivery exceeds 0.05 weight percent. You must continue to use one of the other sampling options until all of the oil from the delivery has been combusted, and you

must evaluate excess emissions according to paragraph (a) of this section. When all of the fuel from the delivery has been burned, you may resume using the as-delivered sampling option.

(c) A period of monitor downtime begins when a required sample is not taken by its due date. A period of monitor downtime also begins on the date and hour of a required sample, if invalid results are obtained. The period of monitor downtime ends on the date and hour of the next valid sample.

ATTACHMENT 2 – SO_2 Emission Calculation Method

1. The Permittee may calculate hourly SO_2 emissions with the following equations:

$$SO2\ emissions\ (lb/hr) = LFG\ flow\ rate(lb/hr) \times TRS\ concentration(ppmw) \div 1{,}000{,}000 \times F\ \times 64.06\ \div\ MW\ of\ TRS$$

Where: 64.06 is the MW of SO_2 and

$$F\ = \frac{\sum_{i=1}^{m}(1\ x\ C_i) + \sum_{j=1}^{n}(2\ x\ C_j)}{C_{TRS}}$$

Where: $F\ =$ sulfur mole conversion factor
$m\ =$ number of sulfide compounds
$n =$ number of disulfide compounds
$Ci =$ concentration of sulfide compound i in ppmv
$Cj =$ concentration of disulfide compound j in ppmv
$CTRS =$ concentration of TRS in ppmv

From: Howley, Ron
To: Silvia Gonzalez
Subject: Read: DAQ Permit_TSD_and_Final Action Report for Source ID: 16539_Republic Services Renewable Energy LLC
Date: Wednesday, March 07, 2018 4:42:21 PM
Importance: High

Your message
To: Howley, Ron
Subject: DAQ Permit_TSD_and_Final Action Report for Source ID: 16539_Republic Services Renewable Energy LLC
Sent: Wednesday, March 07, 2018 7:01:28 PM (UTC-05:00) Eastern Time (US & Canada)
was read on Wednesday, March 07, 2018 7:42:21 PM (UTC-05:00) Eastern Time (US & Canada).

Silvia Gonzalez

From: Vossmer, David <DVossmer@republicservices.com>
Sent: Wednesday, March 07, 2018 4:34 PM
To: Silvia Gonzalez; RHOWLEY@DCOENERGY.COM
Cc: BLEARY@ENERGENIC-US.COM; Macdougall, Carrie
Subject: RE: DAQ Permit_TSD_and_Final Action Report for Source ID: 16539_Republic Services Renewable Energy LLC

Email was received. Thank you Sylvia.

David Vossmer
General Manager
BU 446

13550 North US Highway 93
Las Vegas, NV 89165
e dvossmer@republicservices.com
o 702-599-5901 c 419-656-0276
w www.RepublicServices.com

From: Silvia Gonzalez [mailto:SXG@ClarkCountyNV.gov]
Sent: Wednesday, March 07, 2018 4:01 PM
To: RHOWLEY@DCOENERGY.COM; Vossmer, David
Cc: BLEARY@ENERGENIC-US.COM; Macdougall, Carrie
Subject: DAQ Permit_TSD_and_Final Action Report for Source ID: 16539_Republic Services Renewable Energy LLC
Importance: High

Attached are the Permit, Final Action Report (FAR) and the Technical Support documents for Source ID: 16539, Republic Serices Renewable Energy, LLC. The documents should be printed and maintained on site.

If you have any questions, please contact Michael Rael at 702-455-5942.

Please confirm receipt of this email.

Thank you.

Silvia Gonzalez
Office Specialist
Department of Air Quality
Permitting Division

From:	Grace Bautista
To:	"r9airpermits_NV@epa.gov"
Subject:	Department of Air Quality Permit and Technical Support Document and Final Action Report
Date:	Friday, March 09, 2018 10:14:00 AM
Attachments:	16539_20180301_TSD.pdf 16539_20180301_ATC.pdf 16539_20180301_FAR.pdf
Importance:	High

Source Name	Republic Services Renewable Energy LLC
Permit Number	16539
Permit Stage	Permit, Technical Support Document and Final Action Report
Title V Permit Action	Authority to Construct
NSR Permit Action	Significant Revision
Description of Action	

The attached documents are for your review. If you have any questions, please contact Michal Rael at (702) 455-5942.

Please confirm receipt of this email.

Thank you.

Grace A. Bautista
Administrative Secretary
Department of Air Quality
4701 West Russell Road, Suite 200
Las Vegas, NV 89118
Email: bautista@clarkcountynv.gov
Direct Line: (702) 455-0131

From: Mail Delivery System
To: r9airpermits_NV@epa.gov
Subject: Expanded: Department of Air Quality Permit and Technical Support Document and Final Action Report
Date: Friday, March 09, 2018 10:14:27 AM
Attachments: Message Headers.msg

This is the mail system at host mintra13.pyd.epa.gov.
Your message was successfully delivered to the destination(s)
listed below. If the message was delivered to mailbox you will
receive no further notifications. Otherwise you may still receive
notifications of mail delivery errors from other systems.

The mail system
<r9airpermits_NV@epa.gov>: delivery via local: alias expanded