WASHOE COUNTY HEALTH DISTRICT
AIR QUALITY MANAGEMENT DIVISION

Public Health
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June 21, 2012

Nevada
Environmental Protection

JUN 25 2012

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ENVIRONMENTAL PROTECTION

Ms. Colleen Cripps, Ph.D.
Administrator
Division of Environmental Protection
901 S. Stewart St., Suite 4001
Carson City NV 89701-5249

Dear Ms. Cripps:

The Washoe County Health District - Air Quality Management Division (WCHD-AQMD) is in the process of submitting a revision to the Washoe County portion of Nevada's PM2.5 Infrastructure State Implementation Plan (I-SIP). This revision will include formal submittal of the following five existing Washoe County District Board of Health Regulations Governing Air Quality Management:

- 030.023 Evaluation of Registration Application
- 030.218 Demonstration of Compliance
- 030.230 Record Keeping
- 030.235 Requirements for Source Sampling and Testing
- 030.970 Part 70 Permit Monitoring and Compliance

In order to expedite the approval process and in accordance with 40 CFR 51, Appendix V.2.3, the WCHD-AQMD requests that the Nevada Division of Environmental Protection request the U.S. Environmental Protection Agency (EPA) to initiate parallel processing of the revision to the Washoe County portion of the Nevada's PM2.5 Infrastructure State Implementation Plan (attached).

The 30-day public comment period for the revision opened on May 25, 2012 with the public hearing scheduled for June 28, 2012. Submittal of this revision to NDEP will be no later than July 31, 2012.

If you have any questions or comments, feel free to contact me or Mr. Daniel Inouye of my staff at (775) 784-7200.

Sincerely,

Daniel Inouye for

Kevin Dick
Division Director

cc: Daniel Inouye, WCHD-AQMD

Attachments

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030.023 EVALUATION OF REGISTRATION APPLICATION

When an Authority to Construct application is received by the Control Officer, he shall evaluate it to determine if all necessary information on the source processes has been included. When all the required information has been received, the Control Officer will review the proposal using standard engineering practices and methods, decide which local, state or federal regulations apply to the source, determine by approved modeling or other methods if the proposed control technology will meet regulatory requirements, and determine what, if any, pre-construction monitoring or other testing will be required before the authority to construct is issued. If it is determined that the equipment proposed in the Authority to Construct application is insufficient to meet regulatory requirements, the Control Officer will notify the applicant of the deficient items in writing and state what additions may be made to bring the project into compliance with regulatory requirements. In no case may the review of the project take more than 180 days to complete.

030.218 DEMONSTRATION OF COMPLIANCE

The Control Officer may require the operator of a source to provide any applicable data to demonstrate compliance with the conditions of the Permit to Operate. Such data submission requirements may include, but would not be limited to, graphs, charts or other records of items such as plant operational temperatures, plant production levels, continuous stack monitor outputs, plant operating hours, equipment engineering and design specifications or chemical product consumption. Requested data must be provided in a timely manner, as specified by the Control Officer. Failure to provide this data as requested by the Control Officer constitutes a violation of the conditions of the Permit to Operate, and the affected source would be subject to a citation under these regulations, suspension of their Permit to Operate or both.

030.230 RECORD KEEPING (Amended 9/23/92)

The Control Officer may require any holder of a Permit to Operate to keep adequate records concerning contaminant emissions for any equipment or process for which the permit was issued. All permittees operating add-on emissions control equipment will maintain records sufficient to legally demonstrate that the equipment has operated in compliance with all applicable Federal, State and District regulations. The permittee shall also record any times or occasions when the emissions control equipment is not in operation due to equipment failure, maintenance or any other reason.

030.235 REQUIREMENTS FOR SOURCE SAMPLING AND TESTING

To determine the exact quantity and effect of emissions produced by stationary sources, the Control Officer may require source stack testing, or other types of source testing including, but not limited to, mass balance types of analysis, be made by the operator. Alternatively, and after consultation with the permittee, the Control Officer may require that testing be reviewed and overseen by an independent third party of the Control Officer's selection to insure the quality and accuracy of the test results. The Control Officer may also require other types of pollutant impact analysis, including but not limited to, epidemiological testing of persons who may be affected by the operations of the source, risk assessment determinations, source or receptor modeling and off-site ambient pollutant level monitoring. Completion of testing may be required prior to the issuance or continuance of a permit to operate. The Control Officer may require that all costs of any testing required under this section be borne by the operator or source owner.

030.970 PART 70 PERMIT MONITORING AND COMPLIANCE (Adopted 10/20/93, Revised 10/25/95)

A. Compliance Statements

Sources subject to Part 70 permits shall submit a statement of compliance signed by a responsible official. The annual compliance statement shall be due each year on the anniversary of the date of issuance (or more frequently if required in an applicable requirement). The compliance statement shall address each term or condition of operation on an item by item basis. The compliance statement shall contain the following:

1. Identification of each term or condition of operation that is the basis for certification.
2. The compliance status of the facility with respect to each term or condition of operation and a statement that the operator will continue to comply with such requirements.
3. Whether the compliance with each term or condition of operation was continuous or intermittent.
4. The method(s) used for determining the compliance status of the source including a description of monitoring, record keeping and reporting requirements, and test methods.
5. For any term or condition of operation for which the source is not in compliance, the source must submit a compliance schedule and a narrative description of how the source will achieve compliance with such requirements as described in **030.970 (B)** of these regulations.
6. For any source for which the Control Officer has established requirements for progress reports on compliance schedules, the source must provide these progress reports in a timely manner and address dates milestones and other activities that have been specified by the Control Officer. The progress report shall also include the dates on which any milestones were achieved and an explanation of any dates or milestones that were not or are not expected to be met, why they were not met and any corrective actions to be taken as a result.
7. Any other specific information needed to determine compliance as required by the Control Officer.
8. A certification of the truth, accuracy and completeness of the compliance statement by a responsible official.
9. Any additional requirements as may be specified pursuant to sections 114(a) and 504(b) of the Act.

All Statements of compliance must be made in writing to both the EPA Administrator as well as to the Control Officer. Failure to submit a statement of compliance in a timely manner may result in citation, penalties, suspension or revocation of the Part 70 permit.