Nevada Department of Conservation and Natural Resources • Division of Environmental Protection



Bureau of Air Pollution Control 901 SOUTH STEWART STREET SUITE 4001 CARSON CITY, NEVADA 89701-5249 p: 775-687-9349 • ndep.nv.gov/air

Facility ID No. A0541Permit No. AP3829-1538.04CLASS II AIR QUALITY OPERATING PERMIT

Issued to: OS OPERATIONS, LLC (HEREINAFTER REFERRED TO AS PERMITTEE) Mailing Address: 1631 BENTLY PARKWAY SOUTH, MINDEN, NEVADA 89423 Physical Address: 1631 BENTLY PARKWAY SOUTH, MINDEN, NEVADA 89423 Driving Directions: Approximately 2.5 miles East of Minden, Nevada. From the intersection of Highway 395 and Buckeye Road, travel East on Buckeye Road for 2.1 miles and turn right onto Bently Parkway South. Travel 0.3 miles to facility entrance. General Facility Location: Section 27, T 13 N, R 20 E, MDB&M HA 105 – CARSON VALLEY / DOUGLAS COUNTY North 4,315,604 m, East 263,776 m, UTM ZONE 11, NAD 83

Emission Unit List:

A. System	1 – Non-Emergency Diesel Generators
S2.001	2840 HP Diesel Generator 1 (mfd by Caterpillar, mdl # 3516B, mfd 1999)
S2.002	2840 HP Diesel Generator 2 (mfd by Caterpillar, mdl # 3516 B, mfd 1999)

****End of Emission Unit List****



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Section I. General Provisions

- A. <u>Prohibited acts; penalty; establishment of violation; request for prosecution</u> (NRS 445B.470) (State Only Requirement)
 - A person shall not knowingly:
 - a. Violate any applicable provision, the terms or conditions of any permit or any provision for the filing of information;
 - b. Fail to pay any fee;
 - c. Falsify any material statement, representation or certification in any notice or report; or
 - d. Render inaccurate any monitoring device or method, required pursuant to the provisions of NRS 445B.100 to 445B.450, inclusive, or 445B.470 to 445B.640, inclusive, or any regulation adopted pursuant to those provisions.
 - 2. Any person who violates any provision of subsection 1 shall be punished by a fine of not more than \$10,000 for each day of the violation.
 - 3. The burden of proof and degree of knowledge required to establish a violation of subsection 1 are the same as those required by 42 U.S.C. § 7413(c), as that section existed on October 1, 1993.
 - 4. If, in the judgment of the Director of the Department or the Director's designee, any person is engaged in any act or practice which constitutes a criminal offense pursuant to NRS 445B.100 to 445B.640, inclusive, the Director of the Department or the designee may request that the Attorney General or the district attorney of the county in which the criminal offense is alleged to have occurred institute by indictment or information a criminal prosecution of the person.
 - 5. If, in the judgment of the control officer of a local air pollution control board, any person is engaged in such an act or practice, the control officer may request that the district attorney of the county in which the criminal offense is alleged to have occurred institute by indictment or information a criminal prosecution of the person.
- B. <u>Visible emissions: Maximum opacity; determination and monitoring of opacity</u> (NAC 445B.22017) (*Federally Enforceable SIP Requirement*)
 - Except as otherwise provided in this section and NAC 445B.2202, no owner or operator may cause or permit the discharge into the atmosphere from any emission unit which is of an opacity equal to or greater than 20 percent. Opacity must be determined by one of the following methods:
 - a. If opacity is determined by a visual measurement, it must be determined as set forth in Reference Method 9 in Appendix A of 40 CFR Part 60.
 - b. If a source uses a continuous monitoring system for the measurement of opacity, the data must be reduced to 6-minute averages as set forth in 40 CFR 60.13(h).
 - 2. The provisions of this section and NAC 445B.2202 do not apply to that part of the opacity that consists of uncombined water. The burden of proof to establish the application of this exemption is upon the person seeking to come within the exemption.
 - 3. If the provisions of 40 CFR Part 60, Subpart D or Da apply to an emission unit, the emission unit must be allowed one 6minute period per hour of not more than 27 percent opacity as set forth in 40 CFR 60.42(a)(2) and 40 CFR 60.42a(b).
 - 4. The continuous monitoring system for monitoring opacity at a facility must be operated and maintained by the owner or operator specified in the permit for the facility in accordance with NAC 445B.256 to 445B.267, inclusive.
- C. <u>Visible emissions: Exceptions for stationary sources</u> (NAC 445B.2202) (*Federally Enforceable SIP Requirement*) The provisions of NAC 445B.22017 do not apply to:
 - 1. Smoke from the open burning described in NAC 445B.22067;
 - 2. Smoke discharged in the course of training air pollution control inspectors to observe visible emissions, if the facility has written approval of the Commission;
 - 3. Emissions from an incinerator as set forth in NAC 445B.2207; or
 - 4. Emissions of stationary diesel-powered engines during warm-up for not longer than 15 minutes to achieve operating temperatures.



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Section I. <u>General Provisions</u> (continued)

- D. Odors (NAC 445B.22087) (State Only Requirement)
 - 1. No person may discharge or cause to be discharged, from any stationary source, any material or regulated air pollutant which is or tends to be offensive to the senses, injurious or detrimental to health and safety, or which in any way interferes with or prevents the comfortable enjoyment of life or property.
 - 2. The Director shall investigate an odor when 30 percent or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy. The sample must be at least 20 people or 75 percent of those exposed if fewer than 20 people are exposed.
 - 3. The Director shall deem the odor to be a violation if he or she is able to make two odor measurements within a period of 1 hour. These measurements must be separated by at least 15 minutes. An odor measurement consists of a detectable odor after the odorous air has been diluted with eight or more volumes of odor-free air.
- E. <u>Prohibited Conduct: Concealment of Emissions</u> (NAC 445B.225) (*Federally Enforceable SIP Requirement*) No person may install, construct or use any device which conceals any emission without reducing the total release of regulated air pollutants to the atmosphere.
- F. <u>Prohibited conduct: Operation of source without required equipment; removal or modification of required equipment; modification of required procedure (NAC 445B.227) (Federally Enforceable SIP Requirement)</u>

Except as otherwise provided in NAC 445B.001 to 445B.390, inclusive, no person may:

- 1. Operate a stationary source of air pollution unless the control equipment for air pollution which is required by applicable requirements or conditions of this Operating Permit is installed and operating.
- 2. Disconnect, alter, modify or remove any of the control equipment for air pollution or modify any procedure required by an applicable requirement or condition of the permit.
- G. Excess Emissions (NAC 445B.232) (State Only Requirement)
 - 1. Scheduled maintenance or testing or scheduled repairs which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.390, inclusive, must be approved in advance by the Director and performed during a time designated by the Director as being favorable for atmospheric ventilation.
 - 2. Each owner or operator shall notify the Director of the proposed time and expected duration at least 30 days before any scheduled maintenance or testing which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.390, inclusive. The scheduled maintenance or testing must not be conducted unless the scheduled maintenance or testing is approved pursuant to subsection 1.
 - 3. Each owner or operator shall notify the Director of the proposed time and expected duration at least 24 hours before any scheduled repairs which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.390, inclusive. The scheduled repairs must not be conducted unless the scheduled repairs are approved pursuant to subsection 1.
 - 4. Each owner or operator shall notify the Director of any excess emissions within 24 hours after any malfunction or upset of the process equipment or equipment for controlling pollution or during start-up or shutdown of that equipment.



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Section I. General Provisions (continued)

- G. Excess Emissions (NAC 445B.232) (State Only Requirement) (continued)
 - 5. Each owner or operator shall provide the Director, within 15 days after any malfunction, upset, start-up, shutdown or human error which results in excess emissions, sufficient information to enable the Director to determine the seriousness of the excess emissions. The information must include at least the following:
 - a. The identity of the stack or other point of emission, or both, where the excess emissions occurred.
 - b. The estimated magnitude of the excess emissions expressed in opacity or in the units of the applicable limitation on emission and the operating data and methods used in estimating the magnitude of the excess emissions.
 - c. The time and duration of the excess emissions.
 - d. The identity of the equipment causing the excess emissions.
 - e. If the excess emissions were the result of a malfunction, the steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of the malfunction.
 - f. The steps taken to limit the excess emissions.
 - g. Documentation that the equipment for controlling air pollution, process equipment or processes were at all times maintained and operated, to a maximum extent practicable, in a manner consistent with good practice for minimizing emissions.
 - 6. Each owner or operator shall ensure that any notification or related information submitted to the Director pursuant to this section is provided in a format specified by the Director.

H. <u>Testing and Sampling</u> (NAC 445B.252) (*Federally Enforceable SIP Requirement*)

- 1. To determine compliance with NAC 445B.001 to 445B.390, inclusive, before the approval or the continuance of an operating permit or similar class of permits, the Director may either conduct or order the owner of any stationary source to conduct or have conducted such testing and sampling as the Director determines necessary. Testing and sampling or either of them must be conducted and the results submitted to the Director within 60 days after achieving the maximum rate of production at which the affected facility will be operated, but not later than 180 days after initial start-up of the facility and at such other times as may be required by the Director.
- 2. Tests of performance must be conducted and data reduced in accordance with the methods and procedures of the test contained in each applicable subsection of this section unless the Director:
 - a. Specifies or approves, in specific cases, the use of a method of reference with minor changes in methodology;
 - b. Approves the use of an equivalent method;
 - c. Approves the use of an alternative method, the results of which the Director has determined to be adequate for indicating whether a specific stationary source is in compliance; or
 - d. Waives the requirement for tests of performance because the owner or operator of a stationary source has demonstrated by other means to the Director's satisfaction that the affected facility is in compliance with the standard.
- 3. Tests of performance must be conducted under such conditions as the Director specifies to the operator of the plant based on representative performance of the affected facility. The owner or operator shall make available to the Director such records as may be necessary to determine the conditions of the performance test. Operations during periods of startup, shutdown and malfunction must not constitute representative conditions of a performance test unless otherwise specified in the applicable standard.
- 4. The owner or operator of an affected facility shall give notice to the Director 30 days before the test of performance to allow the Director to have an observer present. A written testing procedure for the test of performance must be submitted to the Director at least 30 days before the test of performance to allow the Director to review the proposed testing procedures.
- 5. Each test of performance must consist of at least three separate runs using the applicable method for that test. Each run must be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the runs apply. In the event of forced shutdown, failure of an irreplaceable portion of the sampling train, extreme meteorological conditions or other circumstances with less than three valid samples being obtained, compliance may be determined using the arithmetic mean of the results of the other two runs upon the Director's approval.
- 6. All testing and sampling will be performed in accordance with recognized methods and as specified by the Director.



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Section I. General Provisions (continued)

- H. <u>Testing and Sampling</u> (NAC 445B.252) (Federally Enforceable SIP Requirement) (continued)
 - 7. The cost of all testing and sampling and the cost of all sampling holes, scaffolding, electric power and other pertinent allied facilities as may be required and specified in writing by the Director must be provided and paid for by the owner of the stationary source.
 - 8. All information and analytical results of testing and sampling must be certified as to their truth and accuracy and as to their compliance with all provisions of these regulations, and copies of these results must be provided to the Director no later than 60 days after the testing or sampling, or both.
 - 9. Notwithstanding the provisions of subsection 2, the Director shall not approve an alternative method or equivalent method to determine compliance with a standard or emission limitation contained in Part 60, 61 or 63 of Title 40 of the Code of Federal Regulations for:
 - a. An emission unit that is subject to a testing requirement pursuant to Part 60, 61 or 63 of Title 40 of the Code of Federal Regulations; or
 - b. An affected source.

I. <u>Permit Revision</u> (NAC 445B.287(1)(b)) (Federally Enforceable SIP Requirement)

If a stationary source is a Class II source, a revision of the operating permit or the permit to construct is required pursuant to the requirements of NAC 445B.3465 before the stationary source may be modified.

J. Violations: Acts constituting; notice (NAC 445B.275) (Federally Enforceable SIP Requirement)

- Failure to comply with any requirement of NAC 445B.001 to 445B.390, inclusive, any applicable requirement or any condition of an operating permit constitutes a violation. As required by NRS 445B.450, the Director shall issue a written notice of an alleged violation to any owner or operator for any violation, including, but not limited to:
 - a. Failure to apply for and obtain an operating permit;
 - b. Failure to construct a stationary source in accordance with the application for an operating permit as approved by the Director;
 - c. Failure to construct or operate a stationary source in accordance with any condition of an operating permit;
 - d. Commencing construction or modification of a stationary source without applying for and receiving an operating permit or a modification of an operating permit as required by NAC 445B.001 to 445B.3477, inclusive, or a mercury operating permit to construct as required by NAC 445B.3611 to 445B.3689, inclusive;
 - e. Failure to comply with any requirement for recordkeeping, monitoring, reporting or compliance certification contained in an operating permit; or
 - f. Failure to pay fees as required by NAC 445B.327 or 445B.3689.
- 2. The written notice must specify the provision of NAC 445B.001 to 445B.390, inclusive, the condition of the operating permit or the applicable requirement that is being violated.
- 3. Written notice shall be deemed to have been served if delivered to the person to whom addressed or if sent by registered or certified mail to the last known address of the person.

K. <u>Operating permits: Imposition of more stringent standards for emissions</u> (NAC 445B.305)

- (Federally Enforceable SIP Requirement)
 - 1. The Director may impose standards for emissions on a proposed stationary source that are more stringent than those found in NAC 445B.001 to 445B.390, inclusive, as a condition of approving an operating permit for the proposed stationary source.



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Section I. <u>General Provisions</u> (continued)

- L. <u>Contents of operating permits: Exception for operating permits to construct; required conditions (NAC 445B.315)</u> (*Federally Enforceable SIP Requirement*)
 - 1. Notwithstanding any provision of this section to the contrary, the provisions of this section do not apply to operating permits to construct.
 - 2. The Director shall cite the legal authority for each condition contained in an operating permit.
 - 3. An operating permit must contain the following conditions:
 - a. The term of the operating permit is 5 years.
 - b. The holder of the operating permit shall retain records of all required monitoring data and supporting information for 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 and all original strip-chart recordings for continuous monitoring instrumentation.
 - c. Each of the conditions and requirements of the operating permit is severable, and if any are held invalid, the remaining conditions and requirements continue in effect.
 - d. The holder of the operating permit shall comply with all conditions of the operating permit. Any noncompliance constitutes a violation and is a ground for:
 - (1) An action for noncompliance;
 - (2) Revising, revoking, reopening and revising, or terminating the operating permit by the Director; or
 - (3) Denial of an application for a renewal of the operating permit by the Director.
 - e. The need to halt or reduce activity to maintain compliance with the conditions of the operating permit is not a defense to noncompliance with any condition of the operating permit.
 - f. The Director may revise, revoke and reissue, reopen and revise, or terminate the operating permit for cause.
 - g. The operating permit does not convey any property rights or any exclusive privilege.
 - h. The holder of the operating permit shall provide the Director, in writing and within a reasonable time, with any information that the Director requests to determine whether cause exists for revising, revoking and reissuing, reopening and revising, or terminating the operating permit, or to determine compliance with the conditions of the operating permit.
 - i. The holder of the operating permit shall pay fees to the Director in accordance with the provisions set forth in NAC 445B.327 and 445B.331.
 - j. The holder of the operating permit shall allow the Director or any authorized representative, upon presentation of credentials, to:
 - (1) Enter upon the premises of the holder of the operating permit where:
 - (a) The stationary source is located;
 - (b) Activity related to emissions is conducted; or
 - (c) Records are kept pursuant to the conditions of the operating permit;
 - (2) Have access to and copy, during normal business hours, any records that are kept pursuant to the conditions of the operating permit;
 - (3) Inspect, at reasonable times, any facilities, practices, operations or equipment, including any equipment for monitoring or controlling air pollution, that are regulated or required pursuant to the operating permit; and
 - (4) Sample or monitor, at reasonable times, substances or parameters to determine compliance with the conditions of the operating permit or applicable requirements.
 - k. A responsible official of the stationary 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 operating permit are true, accurate and complete.



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Section I. <u>General Provisions</u> (continued)

M. Operating permits: Revocation and reissuance (NAC 445B.3265) (State Only Requirement)

- 1. An operating permit may be revoked if the control equipment is not operating.
- 2. An operating permit may be revoked by the Director upon determining that there has been a violation of NAC 445B.001 to 445B.390, inclusive, or the provisions of 40 CFR 52.21, or 40 CFR Part 60 or 61, Prevention of Significant Deterioration, New Source Performance Standards, and National Emission Standards for Hazardous Air Pollutants, adopted by reference in NAC 445B.221.
- 3. The revocation is effective 10 days after the service of a written notice, unless a hearing is requested.
- 4. To reissue a revoked operating permit, the holder of the revoked permit must file a new application with the Director, accompanied by the fee for an initial operating permit as specified in NAC 445B.327. An environmental review of the stationary source must be conducted as though construction had not yet commenced.

N. <u>Required contents of permit</u> (NAC 445B.346) (*Federally Enforceable SIP Requirement*)

In addition to the conditions set forth in NAC 445B.315, Class II operating permits must contain, as applicable:

- 1. Emission limitations and standards, including those operational requirements and limitations that ensure compliance with the conditions of the operating permit.
- 2. All requirements for monitoring, testing and reporting that apply to the stationary source.
- 3. A requirement that the owner or operator of the stationary source promptly report any deviations from any requirements of the operating permit.
- 4. The terms and conditions for any reasonably anticipated alternative operating scenarios identified by the owner or operator of the stationary source in his or her application and approved by the Director. Such terms and conditions must require the owner or operator to keep a contemporaneous log of changes from one alternative operating scenario to another.
- 5. A schedule of compliance for stationary sources that are not in compliance with any applicable requirement or NAC 445B.001 to 445B.390, inclusive:
 - a. Semiannual progress reports and a schedule of dates for achieving milestones;
 - b. Prior notice of and explanations for missed deadlines; and
 - c. Any preventive or corrective measures taken.

****End of General Provisions****



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Section II. General Monitoring, Recordkeeping, and Reporting Conditions

- A. <u>Records Retention</u> (NAC 445B.315(3)(b)) (*Federally Enforceable SIP Requirement*) The holder of the operating permit shall retain records of all required monitoring data and supporting information for 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 and all original strip-chart recordings for continuous monitoring instrumentation.
- B. <u>Deviations (NAC 445B.346(3)) (Federally Enforceable SIP Requirement)</u> Under the authority of NAC 445B.346(3), and in addition to the conditions set forth in NAC 445B.315, the owner or operator of the stationary source shall promptly report to the Director any deviations from the requirements of the operating permit. The report to the Director shall include the probable cause of all deviations and any action taken to correct the deviations. For the operating permit, prompt is defined as submittal of a report within 15 days of the deviation. This definition does not alter any reporting requirements as established for reporting of excess emissions as required under NAC 445B.232 as reproduced in Section I.G. E-mail notifications to: aircompliance@ndep.nv.gov

C. <u>Yearly Reports</u> (NAC 445B.315(3)(h), NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

Under the authority of NAC 445B.315(3)(h) and NAC 445B.346(2) the Permittee will submit yearly reports including, but not limited to, throughput, production, fuel consumption, hours of operation, emissions and supporting documentation to support the calculation of annual emissions These reports and supporting documentation (if applicable) will be submitted via the State and Local Emissions Inventory System (SLEIS) maintained by the Bureau of Air Quality Planning for all emission units/systems specified. The completed report must be submitted to the Bureau of Air Quality Planning no later than March 1 annually for the preceding calendar year.

****End of General Monitoring, Recordkeeping, and Reporting Conditions****



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Section III. General Construction Conditions

- A. <u>Notification of Director: Construction, reconstruction and initial start-up; demonstration of continuous monitoring system performance.</u> (NAC 445B.250) (*Federally Enforceable SIP Requirement*) Any owner or operator subject to the provisions of NAC 445B.001 to 445B.390, inclusive, shall furnish the Director written notification of:
 - 1. The date that construction or reconstruction of an affected facility is commenced, postmarked no later than 30 days after such date. This requirement does not apply in the case of mass-produced facilities which are purchased in completed form.
 - 2. The anticipated date of initial startup of an affected facility, postmarked no more than 60 days and no less than 30 days prior to such date.
 - 3. The actual date of initial start-up of an affected facility, postmarked within 15 days after such date.
 - 4. The date upon which demonstration of the continuous monitoring system performance commences in accordance with NAC 445B.256 to 445B.267, inclusive. Notification must be postmarked not less than 30 days before such date.

****End of General Construction Conditions****



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Section IV. Specific Construction Requirements

A. Not Applicable

****End of Specific Construction Requirements****



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Section V. Specific Operating Conditions

A. Emission Units S2.001 and S2.002

System 1	– Non-Emergency Diesel Generators		Location UTM (Zone 11, NAD 83)	
•		m North	m East	
\$2.001	2840 HP Diesel Generator 1 (mfd by Caterpillar, mdl # 3516B, mfd 1999)	4,315,714	263,947	
\$2.002	2840 HP Diesel Generator 2 (mfd by Caterpillar, mdl # 3516B, mfd 1999)	4,315,715	263,947	
1.	Air Pollution Control Equipment (NAC 445B.346.1) (Federally Enforceable SIP Reqa.S2.001 and S2.002, each, have an oxidation catalyst for CO control.b.Descriptive Stack Parameters Stack Height: 26 feet (each) Stack Diameter: 1.42 feet (each) Stack Temperature: 757 °F (S2.001); 744 °F (S2.002)	uirement)		
2.	Operating Parameters (NAC 445B.346.1) (Federally Enforceable SIP Requirement)a.S2.001 and S2.002, each, may consume only diesel.b.The maximum allowable fuel consumption rate for S2.001 and S2.002, each, so one-hour period.c.Hours (1)S2.001 and S2.002, each may operate a total of 24 hours per day. (2)S2.001 and S2.002, combined may operate a total of 1,000 hours per		0 gallons per an	
3.	 Emission Limits (NAC 445B.305, NAC 445B.346.1, NAC 445B. 22017) (Federally A The Permittee, upon issuance of this operating permit, shall not discharge or cause the S2.001 and S2.002 the following pollutants in excess of the following specified limits a. The discharge of PM (particulate matter) to the atmosphere shall not exceed 0. than 0.33 tons per year, combined. b. The discharge of PM₁₀ (particulate matter less than or equal to 10 microns in d exceed 0.65 pounds per hour, each, nor more than 0.33 tons per year, combined. c. The discharge of PM_{2.5} (particulate matter less than or equal to 2.5 microns in exceed 0.65 pounds per hour, each, nor more than 0.33 tons per year, combined. d. The discharge of SO₂ (sulfur dioxide) to the atmosphere shall not exceed 0.030 0.015 tons per year, combined. e. The discharge of NO_x (oxides of nitrogen) to the atmosphere shall not exceed 0.45 than 40.50 tons per year, combined. f. The discharge of CO (carbon monoxide) to the atmosphere shall not exceed 0.45 than 0.18 tons per year, combined. g. The discharge of VOCs (volatile organic compounds) to the atmosphere shall not exceed 0.45 tons per year, combined. 	e discharge into the a s: 65 pounds per hour, iameter) to the atmos d. diameter) to the atmos d. pounds per hour, ea 81.00 pounds per hour, 36 pounds per hour,	tmosphere from each, nor more sphere shall not osphere shall not ch, nor more tha ur, each, nor more each, nor more	
	h. The opacity from S2.001 and S2.002, each , shall not equal or exceed 20 perce			



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Section V. <u>Specific Operating Conditions (continued)</u>

A. Emission Units S2.001 and S2.002 (continued)

4. <u>Monitoring, Recordkeeping, and Reporting</u> (NAC 445B.346.2) (Federally Enforceable SIP Requirement)

The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

- a. Monitor and record the total daily hours of operation for **S2.001 and S2.002**, each, for each day of operation.
- b. Monitor and record the consumption rate of **diesel** on a daily basis for **S2.001 and S2.002**, **each**, (in **gallons**) by multiplying the maximum hourly fuel consumption rate as stated in **A.2.b** of this section and the total daily hours of operation.
- c. Monitor and record the total yearly hours of operation per year. The annual hours of operation shall be determined as the sum of the monthly hours of operation for all previous months of that year.
- 5. <u>Performance and Compliance Testing</u> (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*) The Permittee will conduct and record the following performance tests every 3 years from previous performance tests on each **exhaust stack of S2.001 and S2.002:**
 - a. The frequency of the required performance tests shall correspond to the frequency of testing set forth in 40 CFR Part 63 Subpart ZZZZ, Table 6, as referenced in **A.6.e** of this section.
 - b. Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxide concentration.
 - c. Method 10 in Appendix A of 40 CFR Part 60, as required in A.6.c of this section shall be used to determine the carbon monoxide concentration.
 - d. For the purposes of demonstrating compliance with the opacity standard established in **A.3** of this section, opacity observations shall be conducted concurrently with the performance test and in accordance with Reference Method 9 in Appendix A of 40 CFR Part 60. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15-second intervals).
 - e. Performance tests required under this section that are conducted below the maximum allowable fuel consumption rate, as established in **A.2.b** of this section, shall be subject to the director's review to determine if the fuel consumption rates during the performance tests were sufficient to provide adequate compliance demonstration. Should the director determine that the performance tests do not provide adequate compliance demonstration, the director may require additional testing.
 - f. Permittee shall comply with the requirements of Section I.H for all performance testing.

<u>Federal Requirements</u> (NAC 445B.346.2) (Federally Enforceable SIP Requirement) National Emissions Standards for Hazardous Air Pollutants (NESHAP) – 40 CFR Part 63 Subpart ZZZZ – for Stationary Reciprocating Internal Combustion Engines

Emissions Limitations, Management Practices and Other Requirements (40 CFR 63.6603(a), Table 2d, Table 2b) The Permittee must comply with the following requirements, except during periods of startup:

- (1) Limit concentration of CO in the stationary RICE exhaust to 23 ppmvd at 15 percent O₂; or
- (2) Reduce CO emissions by 70 percent or more.
- (3) Existing CI stationary RICE >500 HP complying with the requirement to limit or reduce the concentration of CO in the stationary RICE exhaust and using an oxidation catalyst must:
 - (a) Maintain your catalyst so that the pressure drop across the catalyst does not change by more than 2 inches of water from the pressure drop across the catalyst that was measured during the initial performance test; and
 - (b) Maintain the temperature of your stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 450 °F and less than or equal to 1,350 °F.



h

c.

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Issued to: OS OPERATIONS, LLC – BENTLY FACILITY (AS PERMITTEE)

Section V. Specific Operating Conditions (continued)

A. Emission Units S2.001 and S2.002 (continued)

- <u>Federal Requirements</u> (NAC 445B.346.2) (Federally Enforceable SIP Requirement) National Emissions Standards for Hazardous Air Pollutants (NESHAP) – 40 CFR Part 63 Subpart ZZZZ – for Stationary Reciprocating Internal Combustion Engines (continued)
 - Fuel Requirements (40 CFR 63.6604, 40 CFR 1090.305)
 - The Permittee must meet the following diesel requirements for non-road engines:
 - (1) Sulfur content to be 15 parts per million (ppm) maximum.
 - (2) Cetane index or aromatic content as follows:
 - (a) A minimum cetane index of 40; or
 - (b) A maximum aromatic content of 35 volume percent.
 - Performance Tests (40 CFR 63.6612, 40 CFR 63.6620, 40 CFR 63.6625, 40 CFR 63.6645, Table 3, Table 4, Table 5)
 - The Permittee must conduct the following performance tests to reduce CO emissions: (40 CFR 63.6620(a), Table 4)
 - (a) Select the sampling port location and the number/location of traverse points at the inlet and outlet of the control device. For CO and O₂ measurement, ducts ≤6 inches in diameter may be sampled at a single point located at the duct centroid and ducts >6 and ≤12 inches in diameter may be sampled at 3 traverse points located at 16.7, 50.0, and 83.3% of the measurement line ('3-point long line'). If the duct is >12 inches in diameter and the sampling port location meets the two and half-diameter criterion of Section 11.1.1 of Method 1 of 40 CFR Part 60, appendix A-1, the duct may be sampled at '3-point long line'; otherwise, conduct the stratification testing and select sampling points according to Section 8.1.2 of Method 7E of 40 CFR Part 60, appendix A-4.
 - (b) Measure the O₂ at the inlet and outlet of the control device using Method 3 or 3A or 3B of 40 CFR Part 60, appendix A-2, or ASTM Method D6522-00. Measurements to determine O₂ must be made at the same time as the measurements for CO concentration.
 - (c) Measure the CO at the inlet and the outlet of the control device using ASTM D6522-00 or Method 10 of 40 CFR Part 60, appendix A-4. The CO concentration must be at 15 percent O₂, dry basis.
 - (2) Existing CI stationary RICE >500 HP complying with the requirement to reduce CO emissions and using oxidation catalyst, and using a CPMS must: (Table 5)
 - (a) The average reduction of emissions of CO determined from the initial performance test achieves the required CO percent reduction; and
 - (b) You have installed a CPMS to continuously monitor catalyst inlet temperature according to the requirements in §63.6625(b); and
 - (c) You have recorded the catalyst pressure drop and catalyst inlet temperature during the initial performance test.
 - (3) If the Permittee is required to conduct a performance test, the Permittee must submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in §63.7(b)(1). (40 CFR 63.6645(g)).
 - (4) If the Permittee is required to conduct a performance test or other initial compliance demonstration as specified in Tables 4 and 5 to this subpart, the Permittee must submit a Notification of Compliance Status according to §63.9(h)(2)(ii). (40 CFR 63.6645(h)).
 - (5) Each performance test must be conducted according to **A.5.c** of this section. The Permittee does not need to start up the engine solely to conduct the performance test. The Permittee of a non-operational engine can conduct the performance test when the engine is started up again. (40 CFR 63.6620(b)).
 - (6) The Permittee must conduct three separate tests runs for each performance test. Each test run must last at least 1 hour. (40 CFR 63.6620(d)).
 - (7) If the Permittee is required to install a continuous parameter monitoring system (CPMS) as specified in Table 5 of this subpart, you must install, operate, and maintain each CPMS according to the requirements in 40 CFR 63.6625(b)(1) through (6). For an affected source that is complying with the emission limitations and operating limitations on March 9, 2011, the requirements in paragraph (b) of this section are applicable September 6, 2011. (40 CFR 63.6625(b))



c.

f.

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Section V. <u>Specific Operating Conditions (continued)</u>

A. Emission Units S2.001 and S2.002 (continued)

- <u>Federal Requirements</u> (NAC 445B.346.2) (Federally Enforceable SIP Requirement) National Emissions Standards for Hazardous Air Pollutants (NESHAP) – 40 CFR Part 63 Subpart ZZZZ – for Stationary Reciprocating Internal Combustion Engines(continued)
 - Performance Tests (40 CFR 63.6612, 40 CFR 63.6620, 40 CFR 63.6625, 40 CFR 63.6645, Table 3, Table 4, Table 5) (continued)
 - (8) The Permittee must comply with the following subsequent performance test requirements: (40 CFR 63.6615, Table 3)
 - (a) Existing non-emergency, non-black start CI stationary RICE >500 HP that are not limited use complying with the requirement to limit or reduce CO emissions and not using a CEMS must conduct subsequent performance tests every 8,760 hours or 3 years, whichever comes first.
 - d. Monitoring, Installation, Collection, Operation, and Maintenance Requirements (40 CFR 63.6625)
 - (1) If the stationary RICE is not equipped with a closed crankcase ventilation system, the Permittee must comply with either **A.5.d.(1)(a) or (b)** of this section. Owners and operators must follow the manufacturer's specified maintenance requirements for operating and maintaining the open or closed crankcase ventilation systems and replacing the crankcase filters, or can request the Administrator to approve different maintenance requirements that are as protective as manufacturer requirements. (40 CFR 63.6625(g))
 - (a) Install a closed crankcase ventilation system that prevents crankcase emissions from being emitted to the atmosphere. (40 CFR 63.6625(g)(1))
 - (b) Install an open crankcase filtration emission control system that reduces emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates and metals. (40 CFR 63.6625(g)(2))
 - (2) The Permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in **A.5.a** of this section. (40 CFR 63.6625(h))
 - e. <u>Compliance Requirements (40 CFR 63.6605, 63.6640)</u>
 - (1) The Permittee must be in compliance with the emission limitations, operating limitations, and other requirements in Subpart ZZZZ that apply at all times. (40 CFR Part 63.6605(a))
 - (2) The Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR Part 63.6605(b))
 - (3) The Permittee must also report each instance in which they did not meet the requirements in Table 8 to Subpart ZZZZ that apply. (40 CFR 63.6640(e))
 - Recordkeeping Requirements (40 CFR Part 63.6655)
 - The Permittee must keep the following records:
 - (1) A copy of each notification and report that the Permittee submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in 40 CFR Part 63.10(b)(2)(xiv). (40 CFR 63.6655(a)(1))
 - (2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. (40 CFR 63.6655(a)(2))
 - Records of performance tests and performance evaluations as required in 40 CFR Part 63.10(b)(2)(viii). (40 CFR 63.6655(a)(3))
 - (4) Records of all required maintenance performed on the RICE and any air pollution control and monitoring equipment. (40 CFR 63.6655(a)(4))
 - (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with **A.5.e.(2)** of this section including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

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Section V. Specific Operating Conditions (continued)

A. Emission Units S2.001 and S2.002 (continued)

- 6. <u>Federal Requirements</u> (NAC 445B.346.2) (Federally Enforceable SIP Requirement) National Emissions Standards for Hazardous Air Pollutants (NESHAP) – 40 CFR Part 63 Subpart ZZZZ – for Stationary Reciprocating Internal Combustion Engines (continued)
 - g. <u>Reporting Requirements</u> (40 CFR Part 63.6650, Table 7)

The Permittee must submit a Compliance report. The report must contain:

- (1) If there are no deviations from any emission limitations or operating limitations that apply to the Permittee, a statement that there were no deviations from the emission limitations or operating limitations during the reporting period. If there were no periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in 40 CFR Part 63.8(c)(7), a statement that there were not periods during which the CMS was out-of-control during the reporting period; the Permittee must submit:
 - (a) Semiannually according to the requirements in 40 CFR Part 63.6650(b)(1)-(5) for engines that are not limited use stationary RICE subject to numerical emission limitations; and
 - (b) Annually according to the requirements in 40 CFR Part 63.6650(b)(6)-(9) for engines that are limited use stationary RICE subject to numerical emission limitations.

(2) If the Permittee had a deviation from any emission limitation or operating limitation during the reporting period, the information in 40 CFR Part 63.6650(d). If there were periods during which the CMS, including CEMS and CPMS, was out-of-control, as specified in 40 CFR Part 63.8(c)(7), the information in 40 CFR Part 63.6650(e); the Permittee must submit:

- (a) Semiannually according to the requirements in 40 CFR Part 63.6650(b).
- (3) If the Permittee had a malfunction during the reporting period, the information in 40 CFR Part 63.6650(c)(4), the Permittee must submit:
 - (a) Semiannually according to the requirements in 40 CFR Part 63.6650(b).

****End of Specific Operating Conditions****



Issued to: OS OPERATIONS, LLC – BENTLY FACILITY (AS PERMITTEE)

Section VI. Emission Caps

A. Not Applicable

****End of Emission Caps****



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Issued to: OS OPERATIONS, LLC – BENTLY FACILITY (AS PERMITTEE)

Section VII. Surface Area Disturbance Conditions

The surface area disturbance for **OS Operations, LLC** is **0** acres.

- A. Fugitive Dust (NAC 445B.22037) (Federally Enforceable SIP Requirement)
 - 1. No person may cause or permit the handling, transporting or storing of any material in a manner which allows or may allow controllable particulate matter to become airborne.
 - 2. Except as otherwise provided in subsection 4, no person may cause or permit the construction, repair, demolition, or use of unpaved or untreated areas without first putting into effect an ongoing program using the best practical methods to prevent particulate matter from becoming airborne. As used in this subsection, "best practical methods" includes, but is not limited to, paving, chemical stabilization, watering, phased construction and revegetation.
 - 3. Except as otherwise provided in subsection 4, no person may disturb or cover 5 acres or more of land or its topsoil until he has obtained an operating permit for surface area disturbance to clear, excavate, or level the land or to deposit any foreign material to fill or cover the land.
 - 4. The provisions of subsections 2 and 3 do not apply to:
 - a. Agricultural activities occurring on agricultural land; or
 - b. Surface disturbances authorized by a permit issued pursuant to NRS 519A.180 which occur on land which is not less than 5 acres or more than 20 acres.

****End of Surface Area Disturbance Conditions****



Issued to: OS OPERATIONS, LLC – BENTLY FACILITY (AS PERMITTEE)

Section VIII. Schedules of Compliance

A. Not Applicable

****End of Schedule of Compliance ****



Nevada Department of Conservation and Natural Resources • Division of Environmental Protection Bureau of Air Pollution Control Facility ID No. A0541 CLASS II AIR QUALITY OPERATING PERMIT

Issued to: OS OPERATIONS, LLC – BENTLY FACILITY (AS PERMITTEE)

Section IX. Amendments

This permit:

- 1. Is non-transferable. (NAC 445B.287.3) (Federally Enforceable SIP Requirement)
- Will be posted conspicuously at or near the stationary source. (NAC 445B.318.5) (*Federally Enforceable SIP Requirement*)
 Will expire and be subject to renewal five (5) years from: June 6, 2025 .
- 3. Will expire and be subject to renewal five (5) years from: (NAC 445B.315) (*Federally Enforceable SIP Requirement*)
- 4. A completed application for renewal of an operating permit must be submitted to the Director on the form provided by him with the appropriate fee at least 70 calendar days before the expiration date of this operating permit. (NAC 445B.3473.2) (*Federally Enforceable SIP Requirement*)
- 5. Any person aggrieved by a final decision of the Department may, not later than 10 days after notice of the action of the Department, appeal the decision by filing a request for a hearing before the Commission on a form 3* with the State Environmental Commission, 901 South Stewart Street, Suite 4001, Carson City, Nevada 89701-5249. *(See adopting agency for form.) (NAC 445B.890) (*State Only Requirement*)

Issued by: Shantell Davis Supervisor, Permitting Branch Bureau of Air Pollution Control
Phone: <u>(775) 687- 9549</u> Date: <u>Date</u>

Class II Insignificant Activities List Appended to Permit #AP3829–1538.04

Emission Unit #	Emission Unit Description
IA1.001	1.5 MMBtu/hr Natural Gas-Fired Boiler
IA1.002	1.5 MMBtu/hr Natural Gas-Fired Boiler
IA1.003	1.5 MMBtu/hr Natural Gas-Fired Boiler
IA1.004	2.743 MMBtu/hr Natural Gas-Fired Make-Up Air Unit (Anodize Room, 2 Stacks)
IA1.005	0.26 MMBtu/hr Natural Gas-Fired Hot Water Heater
IA1.006	0.26 MMBtu/hr Natural Gas-Fired Hot Water Heater
IA1.007	10,000 Gallon Diesel Storage Tank
IA1.008	Reserved
IA1.009	Lead-Free Wave Soldering Machine
IA1.010	Prox Line Lead-Free Wave Soldering Machine
IA1.011	IPA Desktop Bottles
IA1.012	Screen Printing Operation
IA1.013	Maintenance Shop Parts Washer
IA1.014	Machine Shop Parts Washer
IA1.015	Potting Ovens
IA1.016	Transducer-Related Ovens
IA1.017	Plastic Injection Mold Machines
IA1.018	CNC Lathes and Mills
IA1.019	Conformal Coating
IA1.020	Proto Solder Paste Application/Surface Mount/Reflow Oven
IA1.021	Line 123 Solder Paste Application/Surface Mount/Reflow Oven
IA1.022	Line 124 Solder Paste Application/Surface Mount/Reflow Oven
IA1.023	Prox Line Solder Paste Application/Surface Mount/Reflow Oven
IA1.024	Evaporator
IA1.025	Epilog Mini Laser Engraver
IA1.026	No. 1 Laser Engraver
IA1.027	Epilog Fusion Laser Engraver
IA1.028	Polyurethane Potting Line
IA1.029	Cooling Tower 1
IA1.030	Cooling Tower 2
IA1.031	Anodizing Process
IA1.032	Environmental Chambers
IA1.033	Engineering Test Lab
IA1.034	Lead-Free Selective Soldering Machines
IA1.035	Solder Fountain
IA1.036	Solder Fountain