**Transcript**

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So this is the how to read your air quality operating permit webinar that we are going to be going over Class 2 air quality operating permits.
However, we have all sorts of permits.
We have class one air quality operating permits.
We have operating permits to construct, surface area disturbance permits, change the location, Nevada Mercury control program, lot of different permits and they all have similar sections or the same sections maybe just rearranged, but this permit should cover just about everything that we need to go over.
I also wanted to mention that the this is being recorded and will be posted to our website and the NDEP YouTube channel.
So you can have other people look at it later or return to it for further reference if you want.
So a little bit about our layout for this webinar series there are going to be 5 different webinars.
Starting with this one, we have different topics.
We have the permitting how to understand your air quality operating permit for the first one, then we'll have a few compliance topics.
One will be regarding record keeping with a template, an Excel template, that will be provided similar to the example permit that was provided via e-mail to all of you through this webinar series.
The example permit will also be uploaded with the video on our website, but then and it'll be the same permit that we use for the record keeping template webinar.
Other topics that will be going over in other webinars are what to expect during an inspection and source testing and what that means and what that entails for facilities.
And then we'll even go into enforcement for a webinar talking about what happens when you're involved in the enforcement process.
I'll talk about just what we're going to be going over today, so we're going to be going through a permit front to back.
I know that permits can be big, can look scary, can be very intimidating, but that's what we're here to do, to work through and to help all this very technical jargon be milled down into a more conducive and easy to digest, sort of language and understanding.
We're going to be going over each individual section from the cover pages to the insignificant activities list.
What I will say is not every permit has info in every single section that you'll be seeing.
But again, this is supposed to be a catchall.
We'll be covering over 90% of what's going to be in every single permit with this webinar.
Please ask questions throughout.
You can enter questions into the chat or you can raise your hand.
I'll be stopping periodically throughout in order to field any questions that we might have about individual sections.
Again, you can ask questions about the example permit, or you can ask questions about your own personal permits if you want, and if we don't know an answer, I will definitely get back to you after this webinar.
Before we begin, I do want to talk about first, why the permits exist and why we have permits in the first place, air quality operating permits.
We have state regulations that we have to follow and that's in conjunction with the state implementation plan or a “SIP” that is an agreement between US and EPA for minor sources.
And then for major sources as well, we also have federal regulations that we're required to enforce through EPA delegation.
It's a thing that basically delegates EPA's authority to us, and then the CFR Federal Regulations, 40 CFR part 70 is our Title 5 permitting program and that's how we really enforce and have the authority to enforce on their mate on the major sources, the Class 1 permits.
Just wanted to kind of go over a brief history about that.
And now we'll get into the cover pages.
So the very first thing that you're going to get with every Class, 2 is the is this nice checklist that really goes over very simplistic version of what you need to do for your permit from the moment you received the permit to every annual requirement to what happens when your permit is about to expire and you need to renew anytime there's any changes that need to be made to your permit or if there's any deviations or excess emissions.
If you have any questions, you can absolutely reach out to us.
They have.
We have our number right here and depending on the size of your facility, you can also reach out to the business environmental program at UNR and they can help out the smaller facilities.
And then there's plenty of nice little websites along here.
There's a download permit forms link and is a very useful link that will have all the compliance and permitting forms that you'll need.
And now we'll go into the title page.
So the very first thing that you'll notice with the title page is we have our header for our Bureau, then we have the facility identification number, which is this 4 digit number right here followed by the permitting, the permit number and then the type of permit that you have.
Then we have the facility, the company name, facility name, your mailing and physical address.
They can be the same, but don't have to be driving directions which are usually provided in the application.
So this helps compliance find your facility and it can really be beneficial if it's accurate, and then the general facility location where what county is the facility in what basin?
All that information then we have the emission unit list.
This has all of the systems and emission units, with the exception of the insignificant activities, but we're going to go over that at the end when we reach the insignificant activities list and this is just a summary of your facility.
Now we'll move into the general provisions.
So the general provisions is the first section.
It's boilerplate language for every permittee, so there might be information in here that does not apply to you, but it has all the information for the regulations that are needed.
It's a summary of the applicable state and state adopted federal regulations.
So the first section that we see here is prohibited acts penalty, establishment of violation and request for prosecution.
So a person shall not knowingly violate any applicable provision.
The terms and conditions of the permit and any provision of file or for filing the filing of the information, failure to pay any fee, falsify any material statement, render inaccurate any monitoring device or method required pursuant to the NAC's.
Basically, and then in addition to this, any person who violates these provisions shall be punished by a fine of not more than $10,000 each day of the violation.
So this is a summary saying you have to pay your fees, you can't lie, and you have to follow all of the terms and conditions within the permit and the state and federal regulations, otherwise you are susceptible to an enforcement action.
Then we'll move on to Part B.
Visible emissions, maximum opacity and determination for monitoring of opacity.
The this is this entire section is just talking about if you're required to do an EPA reference method 9, which many of you may know what that is, some of you may not, then you must be certified.
If you don't know what that is, you can double check your permit and make sure that there's no requirements for periodic method nines.
That's not a, at least not at the moment.
Isn't part of a lot of minor source permits, except for initial opacity demonstrations, but we'll get into that in the next section, I believe, but just making sure that if you are method, if you have to do a method nine that you are certified in doing so.
Next, we'll move on to D, odors.
So odors.
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 help in safety, or which in any way interferes with, prevents or the comfortable enjoyment of life or property.
This is you have to mitigate odors as best you can.
We do receive odor complaints and we do investigate those complaints, so be mindful if there is odors, especially if you know that there's going to be odors for something.
Make sure you reach out to us and communicate with us, that you're attempting to mitigate those.
Next, we'll talk about a section F. Section F is prohibited conduct operation of source without required equipment removal or modification of required equipment, modification of required procedure.
This section just talks about that you need to operate your controls at all times, while the emission units are operating.
So if you have water sprays, you need to make sure those water sprays are running while the conveyor belt or whatever it is, is running and you cannot operate your emission units.
If the if the controls are not or are malfunctioning or not operational for whatever reason.
Then we have G, excess emissions.
Each owner or operator of the director uh 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 emission.
So this is just saying that whenever you test or whenever you are doing any sort of maintenance or any sort of equipment.
Modifications that that don't fall under a permit modification, obviously, that you are going to notify us at least 30 days beforehand.
That is a requirement that we have to be aware of so we can be knowledgeable of that.
Then, Section 4: Each owner operator shall notify the director of any excess emissions within 24 hours after any malfunction or upset of the process.
Equipment for controlling pollution or during startup shutdown of that equipment.
So if there is ever an excess emission, you must notify us within 24 hours of that event.
Now that is not a thing of, you know, everything that happened.
It's just an initial notification to our office that, hey, something happened and we're looking into it.
We also have retraction forms, so if you even think that there was an excess emission and it turns out that it wasn't, you can always submit the retraction form.
But if you think that there even was a chance of an excess emission, then submitting that 24 hour notification is important and that is a form on our website under the download permit forms.
Next, we'll move on to a Section 5.
After that 24 hour report, each owner operator shall provide the director with a notification within 15 days after any malfunction upset startup, shut down, or human error, which results in an excess emission.
So this has all of the information that is required, but again, we have a permit form that has all the requirements in there.
So the 15 day notification is your opportunity to say to do your investigation, figure out first what happened, then how much was the excess emission by and then submit it to our office with any supporting documentation.
Next we'll move on to testing and sampling.
So testing and sampling, this is a lot of information right here.
Not all Class 2's have testing.
We will go a lot more into testing in the STACK testing webinar that will be later on, but I just wanted to a couple of dates that are very important on this is 30 days.
You'll director 30 days’ notice before any test of performance.
So we need a protocol at least 30 days prior to testing, and then we need a copy of the report no later than 60 days after the testing or sampling.
So keep that in mind.
Those are the dates that are very important for testing and sampling.
Next, we'll jump down to J, violations, acts constituting notice.
You must apply for and receive a permit before commencing construction.
That's what this section talks about.
You cannot start construction or operation of a unit without first receiving that revision or a new permit, whatever it would call for, then we'll move on to K. K is operating permits, imposition of more stringent standards for emissions.
So this is just the authority that we have to have more stringent standards than federal regulations.
This will explain if you have any questions on why your permit why some conditions might look different than federal or state regulations.
That's why is because we have this for whatever reason have made it slightly more stringent.
Then we'll move on to L, contents of operating permits.
This is why your permit looks so big and so scary is because of all that is required by the NAC to be in your permit.
This is a very long section and you don't really need to read it.
It just has all of the required content to be in the permit.
Now we have section M, affirmative defense.
So affirmative defense is in the process.
I wanted to make a note of this because it's in the process of being removed, and is pending legislative approval.
Just wanted to throw that out there, but it's this is affirmative defense in cases of emergency.
So I'm going to stop right there.
This is.
The end of the general provisions, does anybody have any questions that they would like to ask if this point?
Alright, not seeing any.
We'll stop again pretty shortly after this, so feel free to ask.
You can ask questions about this section later on if you if you want.
So now we move on to Section 2.
The general monitoring record keeping and reporting conditions.
First section and is records retention.
The holder of this operating permit, so the facility shall retain records for all required monitoring data and supporting information for five years after the date of the sample collection, measurement report or analysis.
So you have to have at least five years’ worth of records readily available on site.
This is especially important when inspections are come up and that will go a little bit more into in the inspection webinar, but this is an extremely important section that you have to keep in mind five years’ worth of records need to be readily available for inspection.
Then we'll move on to deviation.
So deviations are similar to excess emissions.
We'll talk about what the differences are, but when it comes to a deviation, you're required to submit only a 15 day report within 15 days after the notification.
This is similar to excess emissions and the fact that it has to be in the same format, that of excess emissions.
The difference between an excess emission and a deviation is an excess emission is an exceedance of the actual emission limit, so the actual pollutant, whereas a deviation is deviating from a permit condition.
So maybe that's an operating parameter like material throughput or fuel usage, or you forgot to record something that's required in the record keeping section of your permit.
If you have any of those instances, you need to submit a deviation report as soon as you discover it. Some of your permits, if you look may have eenotify@ndep.nv.gov under the e-mail notifications is recently been changed to aircompliance@ndep.nv.gov.
That's also the one that's in the form, and either way it's going to get there.
You can put in.
For now you can put in EE notify and it will still get to the correct e-mail address.
But just wanted to make you aware of that update and then yearly reports.
So the yearly reports are the annual emission reports that are submitted through the slice system that is through data management.
This is just saying that it has to be submitted no later than March 1st annually, but it is very important that those get submitted and submitted on time and without any errors.
Alright.
Next we'll jump into before I stop again into the general construction conditions.
This the notification of director construction, reconstruction and initial startup.
So the only thing I really want to point out here are three very important dates that need to be followed.
The start of construction notification needs to be submitted within 30 days after you initiate construction of an emission unit or anything that is in your permit.
You have to then submit an anticipated startup date within between 60 and 30 days before you plan on starting the emission unit, and then you have to submit the actual startup date no later than 15 days after the actual start of operations of that emission unit.
Keep those dates in mind and those are also in the checklist I believe.
So it's a should be easy to go back to in the summary. Before we get into Section 4, I'd like to stop for questions right now if they if you have any.
We have a question, Gregg. For yearly reporting, is the March 1st day a hard deadline or is there any leeway if March 1st falls on a weekend or holiday?
Well, I will say that is a better question for our data management branch and I'm not sure on holidays or anything, what I would say is contact data management and work with them.
Communication with our office goes a long way, but I would also always assume if it says a hard date and that dates and regulation, assume it's a hard date.
But again, communicating with them is where you'll see any sort of leeway on that.
And we have another one.
Can you explain deviations one more time? Yes.
Yes, so deviations, and I can go into this a little bit more when we get to the specific operating conditions, it'll probably be easier to visualize when we get to that point.
But for an excess of mission, an excess emission is when you actually exceed an emission standard, so that's your regulated air pollutants, that’s particulate matter, sulfur dioxide, NOX, carbon monoxide, anything that is in your specific operating conditions as a permitted emission limit. So that's if you have a direct knowledge that an emission limit was exceeded. Then there is your deviations which is deviating from an operating parameter.
So that's your material throughput, your fuel usage.
Potentially your hours of operation if you have limits on that, or if you forget or don't enter something you have as a requirement for your monitoring record keeping and reporting sections.
If you don't record your daily throughput or your fuel usage, that's a deviation that needs to be reported.
One of the important things about a deviation or excess emission report that you must include is what steps you have taken to prevent reoccurrence.
What we expect from facilities is, you know mistakes happen all the time, but if it becomes repetitive and it becomes part of a pattern, then that's when we get concerned.
Any more questions?
No questions.
So now we'll move on to specific construction requirements. For specific construction requirements, the first section that we have is initial opacity compliance demonstrations, so we have a couple of tables here and sections one and two of this just reiterate the testing and sampling section from Section 1.
So talking about when you're supposed to have your initial startup tests and making sure that everything is followed as far as testing and sampling like in this section of the NAC. The two tables in this case one is opacity, you'll have an initial opacity compliance demonstration as you can see, this requires a method 9 and it requires at least a six minute observation.
And as those of you who are trained in method nine are aware, that needs to be 15 seconds apart, 24 consecutive observations in order to get that opacity reading.
Then we have the initial performance testing.
So in this case, the one of these systems has an actual stack test that must be performed, and again we'll have more information on stack testing, specifically in a future webinar.
But this is where you'll see initial testing requirements is in this section, so pay attention to that.
That'll be very important and this table have what needs to be tested, what methods can be tested, or are supposed to be used.
But one thing I will say about this is if you communicate and talk with your inspector, these methods are not set in stone and can be modified to a different test method in order to better if there's some sort of weird scenario where a different test method would be more appropriate, you can work with your inspector to figure out what the best solution is in order to test something.
So being in communication with compliance, can help determine what the best method would be.
And then if we go to Section 4, we have the initial testing.
Initial performance tests must be conducted under such condition as the director specifies.
So when we talk about what condition that we expect, we talk about normal operating conditions, the normal operating conditions mean what do you normally operate at for material throughput and fuel usage.
Similarly, that also is in Section 7.
Initial performance tests required under this section that are conducted below the maximum allowable throughput shall be subject to the directors review to determine if throughputs during the initial performance tests were sufficient to provide adequate compliance demonstration should the director determine the initial performance test did not provide adequate compliance demonstration, the director may require additional testing.
This is basically going back to our normal operating conditions and I will say if the throughput is less than or fuel usage is less than 80% of your maximum, you might want to expect a records request to make sure that your normal operating conditions are actually below that 80%.
And this is especially true in cases where you're operating at maybe half of what you're allowed to, and then your emission limits are at 90% or are above that 50% of the emissions are above 50% of that emission limit, that's when we're going to start being concerned that if you operate at 100% of your material throughput or fuel usage, how are your emissions going to be affected by that?
So, we don't want to say maximum, because if you're not used to operating at maximum and things tend to start breaking when you get that high, if you're systems aren't used to it and we don't want your systems to break, but make sure that you are operating as close to maximum as you can without things breaking and at least normal operating conditions.
Alright, I'll stop right there before we get on to the meat and potatoes, Section 5.
Are there any questions?
No questions, Gregg.
Alright.
We’ll, now move on to Section 5.
The specific operating conditions and I'll talk more about the comparison between deviations and excess emissions in here.
So you can better see what I'm talking about, but we'll start with system one.
So there are two PF units within system.
One PF stands for process fugitive.
This is a these are systems without a stack.
In this case have no add-on controls.
One thing that I will say in this example permit is that there is not only an hourly throughput limit and an annual, but there's also hours of operation per day.
There is an annual limit in hours and then there is also a time of day restriction.
So I tried to make this example permit as complicated as possible to really showcase everything.
The time of day limits, one thing that is good to note is that the time difference between 4:00 AM and 8:00 PM is 16 hours.
Whereas the hours per day is only 14.
This is because usually because of air dispersion modeling, when we model the facility, you can operate based on the ambient air quality standards.
Sometime at least no more than 14 hours per day within this 16 hour gap.
So if you do have time of day restrictions, pay attention just because you only operate 4:00 AM to 8:00 PM, that doesn't mean that you're not violating a condition of your permit, and you need to make sure that you're only operating the entire thing.
And this is for flexibility.
The reason that there's a time difference so you can operate however you want for 14 hours within the 16 hour period.
Then we'll go into the regulated air pollutants.
So these are the conditions where excess emissions will occur.
So if you have particulate matter or PM10 or PM2.5 or opacity that are exceeding their allowed limits, then we should expect to see an excess emission report within 24 hours after the discovery, and then 15 days after that report.
And then there's the deviation.
So then we'll move on to the monitoring record keeping and reporting section.
In this section we have the operating parameters that you have to go through with recording throughput on a daily basis.
Hours of operation on a daily basis.
The start and stop times as well on a daily basis.
For each of those emission units, so just recording all of this information and then calculate the tons per hour equivalent based on all of that usage each day.
So if you miss one of these instances, any of these instances, within monitoring record keeping and reporting, which if you have any whatever operating parameters you have, you can expect at least to record those.
And so this is where you'll see the deviations.
So if you deviate from the 30 tons per hour or the tons per year, or the hours or time of day, then you should be seeing a deviation report on those ends.
Or if you don't record it, that's another case that you should be doing that one thing that I really want to emphasize on this monitoring record keeping and reporting section is that record keeping is extremely important.
It is our surrogate to determine emission compliance.
The alternative to record keeping is constant testing or continuous monitoring systems, which those of you that are on the call that have continuous monitoring systems know how time heavy they are and how expensive they can be.
So it's something that we obviously don't want to do, especially for Class 2 facilities.
This is our surrogate to determine compliance.
Alright, now we'll move on to Section 5.
So Section 5 has federal requirements.
One thing that I will note is that up here in the emission limits, the PF 1.001 shall not exceed 20%, but it doesn't mention PF1.002.
That's because that's down here under the federal requirements, because that specific emission unit falls under this subpart.
I this subpart is applicable to only that emission unit, so that means they have to follow a 7% opacity in this case and those of you who are method 9 certified who have had training in method nine in the past knows that basically 7% means anything is not good.
But it does say that you can disregard startup, shutdown or malfunction.
The malfunction portion of this EPA defines malfunction as any sudden, infrequent, and not reasonably preventable failure of an air pollution control equipment, process, equipment, or a process to operate in a normal or usual manner.
Failures that are caused in part by poor maintenance or careless operation are not malfunctions, so that is the difference between a malfunction.
That's totally unforeseeable and a case where it's just a case of poor maintenance.
Under Section B, we have the notifications of reports.
This is just saying that you have to report it to our office and we have the anything as far as deviations or any excess emissions or any violations of the CFR, the Code of Federal Regulations.
The report that to us, since we are a delegated authority and if we have all of the forms required on our website.
And then we have the last section of Section 5, which is at all times the permittee shall maintain and operate the emission unit, including air pollution control equipment.
So if you are operating, this is again reiterating the previous sections.
If you operate the emission unit you have to operate the air pollution control with it.
In this case it's not applicable because there's no add-on controls.
But that's just an additional federal standard that must be met and is very important.
Alright, I'll stop there for a moment if anyone has questions about system one.
Otherwise, we can move on to System 2.
We'll move on to System 2.
So system two in this case is a dryer and this is an S unit.
S stands for stack, which means it has a stack as you can see, with the descriptive stack parameters, this has a control which is a multi-cyclone, four cyclones in series, and a bag house.
So a lot of controls on this particular item.
One thing that I do want to note on System 2 is that the exhaust flow is needs to be correct.
These are very important these stack parameters because we use this in our air dispersion modeling.
If it turns out from testing or from any sort of monitoring or observations that any of these stack parameters are not within a reasonable range of their standard, that we might require additional modeling and it might turn out that your facility is not operating within the ambient air quality standards and then we'd have to restrict some sort of aspect of your operations because of it.
So it's very important that these are as close to accurate as possible if they are way off, that's when it'll really raise some red flags.
Then we'll look at Section 2.
So in Section 2 this has can only operate natural gas.
This has a fuel usage component, so you have to monitor fuel consumption and throughput rate, but it doesn't have any hour restrictions or anything so you can operate this until 24 hours per day.
Some older permits have 8760, which is how many you can operate in a year.
You know, barring a leap year, but we're not going to hold you to taking a day off.
And then we have our emission limits and the emission in this case because there's a fuel component, there's not just particulate matter or and opacity, there's also gaseous testing or gaseous, sorry, emission limits, that's still for dioxide, nitrogen oxides, carbon monoxide and the VOC have volatile organic compounds.
So with fuel usage, there are additional emission standards that need to be followed. Section 4: Monitoring and record keeping.
Again, it's the same sort of information you have to keep track of hours, natural gas usage, material throughput and then calculate the tons per hour and standard cubic feet per hour for both of those.
In this case, it's very similar to system one, but in this case there's also additional information that needs to be recorded.
So under subsection F, It says conduct and record a visible emission observation for this and it's on a monthly basis.
So if it doesn't explicitly say method 9, then method nines are not required.
However, if you see any sort of opacity coming off, excluding water vapor, then you need to do some sort of maintenance in order to figure out why it's there is any opacity at all.
It would be good, it's recommended that that method 9 training is done at least once, so you are aware of what opacity looks like.
However, it's not a requirement, but keeping that in mind because if we come on site and you don't know what 20% looks like and we do an opacity reading and it's 20%, then you might be open to an enforcement action because of that.
Then we have a section subsection G.
So subsection G just talks about inspecting the control in accordance with manufacturer specifications.
If specifications for an inspection don't exist within the manufacturers specs, or you don't have the manufacturer specs, maybe you purchased this piece of equipment used or purchased the plant from someone else and aren't aware.
We recommend doing it at least monthly from a compliance standpoint.
It shows that you are trying to make a good faith effort to stay in compliance and make sure that any corrective actions that are needed are recorded and provided to us for inspection when we come on site for an inspection or records review.
Alright, now we have Section 5 of system two, which is the performance and compliance testing.
So this is similar to what was in Section 2 for the initial testing, but in this case it says that testing must occur at least 90 days prior to the expiration of the operating permit, but no later than 365 days from the expiration of the operating permit and every five years thereafter.
So this is what's called permit renewal testing.
One thing is that we would rather see you trying to perform the test closer to that one year mark than 90 days before the test.
It is very important that renewal testing happens and happens on time and if an emission unit is going to be tested but then breaks and then you fall out of that 90 day time frame, we are more than happy to work with you, but it it's going to cause a lot of hiccups along the road.
A permit renewal test must happen on time in order for the permit renewal to proceed.
If it can't proceed and may require the facility to stop operating and we don't want to do that, so try and schedule your testing 365 days out as opposed to 90 days out and then we if something happens and something breaks, you got plenty of breathing room.
And then we get into subsections A through E and this is just explaining the different test methods that can be performed.
For example, we have method 5.
We have method 201A.
Those can be interchangeable.
201A is just able to speciate out PM10 and PM2.5 emissions.
Or you can consider it all PM10 and PM2.5 if you use method 5.
So just like testing in the specific construction requirements section, this method test methods can also be discussed with your inspector.
If something isn't going to work and then you can change those methods out.
Otherwise, we're going to assume that you're going to use these methods for subsection F this is the another method 9 opacity exam that has to be done while the unit is operating with material being processed.
That's because we have had cases in the past where facilities have tried to do method nines when it wasn't running or it wasn't running with material.
So this is saying you have to do it concurrently with the applicable performance test, in which case is the method 5.
So you have to do at least a 6 minute observation during method 5 testing.
And I'll stop right there for System 2.
If anyone has any questions.
Could you please go over the opacity checks if the observer isn't method 9 certified and if the operator sees any emissions?
Absolutely.
So it's important that you do if you're not method 9 certified, chances are a person does not know what 20% looks like and that our inspectors will go on site.
And if we see something, we'll do a method 9 because we are all method 9 certified, and if it's if we determine that it is over 20%, then you are susceptible to a violation.
But that doesn't mean that you're required to do a method 9.
It's a method that you can use in order to educate yourself a little bit more.
Currently what's required is just observing emissions, making sure that there are no emissions coming from a stack if there are emissions coming from a stack, then we strongly suggest that as someone who is untrained looks at the actual operations of, for example, bag house.
And says OK, how can this be improved?
Are there holes in the bags?
Are there are there cases like why?
Why is there opacity?
You know, coming from in this case, a dryer.
So I'm not sure if I really answered your question, but just making sure your maintenance is up to date in order to really show that good faith that you are trying to make sure that the conditions of the permit are not being violated.
She said you did.

OK, great.
We'll move on to system three now.
We have one more.
Go for it.
How do you determine what equipment is assigned to each system?
So usually what I'll say is how each emission unit or how groups of emission units are broken up to into systems is based on common control.
So there are some exceptions to that.
I would say most cases it's common control.
We'll have our permit supervisor, Jaimie Mara, do a little bit more explanation.
Thank you, Gregg. For permitting how we determine which units the I'll go into certain systems are based on, yes, common control, if they all admit to the same control, then that goes into one system.
If they have identical operating parameters that includes operating hours, throughput, emission limits.
And silos are also one whole system.
So anything identical goes into a system.
Silos loading and unloading are also one system.
Did that help you out at all?
Yes.
Thank you.

Great.
We have another.
Ohh yeah.
Can you please explain the five years thereafter requirement and the before expiring testing requirement?
So yes, we can go back up.
So yeah, so the 90 days prior to the expiration of the permit?
So if your permit expires, let's say three months from today, then you'd be required to test no later than today.
But you can't test earlier for a permit renewal test more than one year before your expiration of the permit.
So again, if your permit was to expire 90 days from today, that would probably be around October 18th-ish.
You could you can't test before October 18th, 2023, and in that case, so that's just kind of laying out that the testing needs to be within a certain time frame.
And then every five years thereafter, so it needs to happen.
This is just kind of a catch all in case for whatever reason a new permit is not able to be issued within a five year span that you have to continue this test every five years in order to continuously determine compliance.
This will also be included in future permits or permit revisions.
If you are still required to perform renewal testing.
Yeah, I think the goal here is that when that permitting receives the renewal application that that testing has been done and so that we can verify the numbers that in the next renewal, those numbers are still valid.
So there's a comment made on here.
It becomes four year testing.
It's basically the last year of operations up to 90 days before the expiration, so it's not.
It can be four year testing, but we'd also accept up to 90 days before the expiration, so I hope that helps.
Yes.
Assuming no other questions, let's move on to System 3.
So system three, this goes back to another couple of PF units.
Again, process fugitive units this time these are controlled by water sprays.
Water sprays are very common control that we see throughout.
There'll be a little bit more explanation on the difference between water sprays versus commercially designed water sprays in our inspection webinar, but this is a very common control and again this whole system is very similar to system one.
What I will say in this case there's different throughputs for PF 1.003 versus PF1.004 and the combined has to be recorded or can't be exceeded on an annual basis.
And then again, we have our hours restrictions and time of day restrictions on here.
We have emission limits saying very similar.
In this case, they can't have a combined opacity exceeding 20%.
And then we'll move on to Section 4, where Section 4 is again very similar.
You just have to monitor the throughput for each the hours of operation for each and other than that, it's pretty much the same.
Then you have to inspect the water sprays according to manufacturer specifications and again make any corrective actions.
We recommend doing that as frequently as you need in order to make sure that the water sprays are actually functioning and functioning properly, and then you have to maintain those records.
So it's all very similar to the other systems that we've seen.
And again, we have more federal requirements in this case.
Again, in this case, both of these emission units are subject to this subpart, so both of them cannot individually exceed 7% opacity.
And then there's some different requirements because of the control type, so making sure that the water sprays are being inspected and including the date of inspection and any corrective actions that are taken.
So these are more slightly more specific on requirements because it's a federal subpart applicability.
But it talks about you have to initiate any corrective action within 24 hours and complete the corrective action as expediently as practicable.
If there's any issues with the water flowing properly or the water spray nozzles not working properly, so making sure those emission units are maintained and controls are maintained so emission units are not exceeding opacity or PM limits or anything like that.
I'll stop here for questions and then we can get into generators.
Yeah, someone raised their hands.
So I'm going to this person 2nd.

 **Justin Tiearney** 1:07:37
Hi there sorry about that.
One more question on the excess emissions.
Umm, an example.

1:07:42
Absolutely.

 **Justin Tiearney** 1:07:45
Can you give me an example on how you would test the 20% at a landfill fire?

1:07:53
I mean, you can definitely do if you are method 9 certified, you can do a method 9 to making sure the sun is to your back and observing the smoke coming off of it, ignoring any if there is any moisture or water vapor that's visible ignoring that.
But I do feel like if it's an active fire that hasn't yet been attempted to put out, it's probably more black smoke than white smoke in method 9 certification, you are certified for both black and white smoke, so that would be probably the best method to do it.
There are other methods, but and I think method 9 is probably just the.
I don't even want to get into that.
Yeah, method 9 is probably the way to go with that.

 **Justin Tiearney** 1:08:40
Great.
Thank you guys.

1:08:41
Mm-hmm.
Alright, now we'll get into generators system 4.
So even though this is a stack system, it doesn't have any add-on controls, engines don't.
I'll say they usually don't have additional controls beyond what is just normally required of them, but we do have our descriptive stack parameters.
In this case it says you can only consume diesel fuel and there is no material throughput, only fuel usage.
So we have that and there's also no time of day or hour restrictions in this case because of the fuel usage we have our mission limits for particulate matter, sulfur dioxide, nitrogen oxides, carbon monoxide, volatile organic compounds and opacity.
Just like the previous systems and then monitoring and record keeping and reporting, just have to keep track of the usage of hours of operation and then the diesel consumption rate is calculated by multiplying the maximum hourly which is in this section right here.
This 46.2 gallons per hour and multiplying it by the hours of operation.
You may be wondering.
Well, then why do we have to keep track of this if it can't be exceeded as far as an operating parameter, and this is more for annual emission reporting, it's very important that the hours of operation are closely monitored, so we know approximately how much we have a conservative estimate of how much fuel usage is being burned over the course of the year.
In this case we also have our federal requirements in this guy and the federal requirements for engines.
There are three different types.
There's IIII, which is what this one's applicable to, there's also JJJJ and ZZZZ and those are just different subparts for different engines.
Depending on the size, the date of manufacturing and a couple of other requirements that determine which one you fall under.
In this case we have a IIII engine.
The federal limits that you see here should be the same as the state ones that you see up above, and that's just how we will take those in cases of subparts that determine the emission rate.
Then we have subsection B which is fuel requirements, talks about the sulfur content.
All of this information should be provided from the fuel supplier and in cases where testing is required, this can be a very helpful tool in case, for example for sulfur content.
If you exceeded sulfur dioxide emissions, that is something that we have seen and we have been able to receive this fuel sulfur certification, which then had led us to have the testing company to a fuel analysis instead, which determined that the sulfur content was higher than what was expected than that ultra-low sulfur fuel.
So at that point we were able to provide that information on to EPA because that's not really our jurisdiction for fuel enforcement, but this is information that should be able to get from the fuel supplier and can definitely help with any potential issues.
If you do have to conduct a source test, and if you fail resource test for these types of emissions. Then we go to subsection C that are monitoring requirements.
This is just saying that you have to keep your particulate filter clean in your engine, so make sure that you maintain your engine as required and is up to snuff for the entire time.
For section 5, D1 and 2, this is just saying you have to install, operate and maintain according to manufacturer specifications and kind of along that long line on D3.
What happens if you don't run it according to manufacturer’s instructions and then lastly, E, is just saying that if you can meet all the requirements of subpart IIII you can meet all the requirements of Subpart ZZZZ which is also required.
But IIII is just as or more stringent in some cases.
So this is the end of the specific operating conditions for our example permit.
Does anyone have any questions at this time?
Otherwise, we can move on to our mission Cap section.
So now we'll move on to the last little bit of this.
I think I'll probably stop one more time before we are able to finish up with this permit and we can field any questions at the very end, but for emission caps.
So in reality this example permit does not have any significant hazardous air pollutant or HAP emissions.
However, we added this in here for a good example.
And it includes subsections in the permit that don't exist.
It's just an example of what we'd be looking for. The emission cap section is usually used in cases where you if a facility needs to stay under a certain class threshold or needs to pass air dispersion modeling.
HAPs again aren't coming from these permitted sources in any significant way, but it's added for explanation, the applicable systems will be referenced right above.
So you'll see the PF 1.001 and 002 from system 1, S2.001 System 2, system 3, some 4.
So all applicable emission units will be referenced in the section and then it'll talk about the cap, what the cap is this in this case for HAPS, it is 9.9 tons for an individual HAP and 24.9 tons per year for the combined HAPs.
The other information that you would want to check out here on the emission limits for the group in one is for the entire facility or those applicable units and basically just saying on system two, you have to record those individual units and combine them in order to make sure that you are staying under that emission cap.
And then we'll quickly move on to the surface area disturbance conditions.
And then after that and schedules are compliance, we'll stop for questions.
But service area disturbance, this is just every operating permit comes with its own service area disturbance permit built in.
It does say in hear 5 acres and no more than 20 acres, but you can ask for any sort of acreage that you want and that will be referenced up at the top right here and then we can quickly move on to the schedules a compliance.
So schedules is a compliance are sometimes added if either there's federal requirements that are coming into effect or requirements that are from us to ensure compliance.
In this example scenario, we are requiring that by July 1st, 2025, the Permittee shall evaluate the following equipment and either add a scale onto conveyor about C1 or conveyor belts C3 and C4.
So either one emission unit before the, I believe it's the screen or the two emission units after the screen in order to confirm what the material throughput is going through.
And the alternative, the installation or alternative shall be provided on or before July 1st, 2025.
So this gives a deadline for meeting a certain requirement of the permit.
All stop right there briefly.
If there's any questions otherwise, we can finish this up and field any last questions.
So yeah, now we'll get to the amendment section.
So in this case, there's no amendments.
But what you will see here is a date of the amendment and a brief description of what those are.
They're useful reference for permitting and compliance.
And then can also be for you guys if you don't want to read your entire permit over again.
And then we have the signature section just like business license and it says in Section 2 this will be posted conspicuously at or near the stationary source.
It is very important that this is followed while it is not something that compliance would recommend for enforcement by itself.
It could be added if we see additional issues just keeping it right next to, you know, posted just this page and it's also very important because we have the expiration date of the permit and the expiration date is a very important date.
You should always keep track of so you don't accidentally miss those important deadlines, like submitting your application for renewal at least 70 calendar days before the expiration date of this operating permit. That is extremely important, not missing your renewal testing and not missing your application submittal date with the appropriate fees.
Those are both extremely important.
You may receive a courtesy reminder letter and emails as long as your contact information with us is up to date.
So we try and remind you as much as possible before the as this state starts getting closer and closer.
And then you'll have a nice little signature from the permitting supervisor here, but not in this case.
Then lastly, we have our insignificant activities list.
So these are emission units that do emit, but not enough for us to put them in systems.
What I want to clarify about this.
Sometimes there are new federal regulations or some sort of regulations that will come into effect that will require insignificant activities to be put onto as an actual permitted emission unit.
And if that's the case and it's not already on the insignificant activities list, then that could be unpermitted equipment.
So make sure that all of your emissions are accounted for and that you're following the insignificant activity requirements.
And I think that's it for the actual permit.
So that was how to read your air quality operating permit.
Again, this is being recorded and will be posted both on our NDEP YouTube channel and on our website.
I can answer any lingering questions now, and you can again ask any specific questions about your permit.
We're totally happy to answer them here, or we can answer them.
Either your permit writer, permitting supervisor myself or Chad, the minor source compliance supervisor, or your inspector can answer any questions you have at a later date.
But thank you so much for attending.
And are there any questions?
One question, will the PDF also be available?
Yes, the example permit will be available, and it'll probably be in the download permit forms area under the compliance side.
The whole presentation to pick you could check.
Yeah.
I mean the only difference is a couple of additional slides, but yeah, we'll upload this to it.
Can you explain again when we see the emission caps section in the permit please?
Yes.
So in emission caps scenarios, I'll see if I can move up.
So in the emission caps scenarios, it'll be when there are combined when the entire facility or sections of the facility are required to stay under a certain threshold.
Again, this could be because of air dispersion modeling, or in order to stay out of a major source, we'll have Ashley Taylor, the minor source permitting supervisor to explain a little bit better.

And usually emission caps have been requested by a facility, so we don't usually impose this.
This is something that the facility has decided to request.
Hopefully that answers your question.
Yeah.
We have another question.
Are most air permits in Nevada transferable to new owners?
So yeah, what I will say this can be confusing.
This is nontransferable portion.
What we mean by that is you can't just hand the permit over to some random guy and say this is now your permit to follow.
We have administrative amendments and other forms in order to be able to transfer it from one company to another.
Is Nevada DCNR the YouTube channel?
That's a good question.
I'm not 100% sure we can get back to you on that one.
So we'll make sure to send out those and get it posted.
Yes.
We have the registration.
All the people who registered too.
So we'll make sure that all of you are included in a the specific e-mail with the information of where it's posted.
Thank you.
On the questions.
And then are there dates for the other webinars?
We don't have dates currently, but they are coming out soon as we work through all the doing, the test runs and everything.
We'll have dates for the future webinars that will be sent out just like this one was.
It will probably try to give at least a weeks’ notice.
And again, we'll also send out another e-mail to everyone on this that has attended here that registered specifically to make sure that all of you get it as well.
OK, several people saying this is very helpful and appreciated and we appreciate everyone else joining as well too.
Awesome.
Well, thank you so much.
And if there's no other questions.
We will adjourn.
Thank you so much.

 **Gregg Rosenberg** stopped transcription