

District Board of Health Regulations Governing Air Quality Management Chapter 030 Implementation

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Supervisor, Permitting and Compliance

Air Quality Management Division

Air Quality Management Division

Mission

The Air Quality Management Division (AQMD) implements clean air solutions that protect the quality of life for the citizens of Reno, Sparks, and Washoe County through community partnerships along with programs and services such as air monitoring, permitting, compliance, planning, and public education.

District Board of Health

Strategic Priority

2. Healthy Environment: Create a healthier environment that allows people to safely enjoy everything Washoe County has to offer.

2.1 Protect people from negative environmental impacts.

Chapter 030 Source Permitting

Background

- Chapter 030 establishes the requirements for air pollution control and air quality permitting for sources of regulated air pollutants located within Washoe County
- These requirements are used to protect public health and welfare
- Establishes minimum thresholds for air quality permitting, air pollution control requirements, and exemptions from air quality permitting requirements
- Also establishes application, monitoring, reporting, recordkeeping, and testing requirements



Chapter 030 Source Permitting

Topics of Discussion for Workshop

- **Reporting Requirement Changes**
 - Annual Emissions Reporting
- **Annual Fee Changes**
 - Actual Emissions Fees vs Allowable Emissions Fees
- **Expiration Date Changes**
 - Expiration dates will be updated on all Permits to Operate

*This workshop is intended for Minor Source and Synthetic Minor Source Operating Permit holders



Chapter 030 Source Permitting

Annual Reporting Requirement Changes

- **Annual Emissions Report (AER) requirement is changing on January 1, 2025**
 - AER's were required approximately 6-weeks prior to the expiration date of a Permit to Operate
 - Annual fees were based on the AER emissions from the previous calendar year
- **Yearly Reports, Annual Emissions (Paragraph 030.040.B.13.a)**
 - Beginning January 1, 2025, any owner or operator subject to the provisions of CHAPTER 030 may be required to submit reports...used to determine the reported emissions from each permitted emissions unit for the previous calendar year.

13. YEARLY REPORTS, ANNUAL EMISSIONS.

- a. Any owner or operator subject to the provisions of CHAPTER 030 may be required to submit reports including, but not limited to, throughput, production, fuel consumption, hours of operation, emissions, emission factors and calculations used to determine the reported emissions from each permitted emissions unit for the previous calendar year. These reports will be submitted to the Control Officer for all emissions units/systems specified on the Permit to Construct and/or Permit to Operate. The completed report must be submitted to the Control Officer no later than March 31 annually for the preceding calendar year.



Chapter 030 Source Permitting

Annual Reporting Requirement Changes

- **Annual Emissions Report Requests**
 - AER requests will **no longer** be sent to permittees
 - In place of the AER Request, a memorandum will be sent approximately 45 days prior to expiration date of a Permit to Operate outlining:
 - Changes to 030 Source Permitting Regulations
 - Changes to the Annual Emissions Reporting requirements
 - Changes to the assessment of fees based on an 'allowable' structure
 - Requirement to continue to maintain records sufficient to legally demonstrate the permitted equipment has operated in compliance with all required regulations



Chapter 030 Source Permitting

Annual Reporting Requirement Changes

- **Permit to Operate Language Change**
 - **Disregard language on current permits issued in 2024 and expiring in 2025**
 - **Annual Emissions Reports will not be required on March 31, 2025**
 - Annual Emissions Reports may be required in the future for air quality planning purposes. If these are required permittees will be notified in advance of the submittal date
- **The Annual Emissions Requirements in the Permit to Operate will be updated to reflect this change starting on January 1, 2025**

ANNUAL REPORTING REQUIREMENTS

Per the Permit to Operate, the annual throughput/consumption figures for the previous calendar year (January 1st to December 31st) must be submitted in writing to the AQMD no later than 3/31/2025. **You may submit this information in the form of a spreadsheet, word document or pdf, or write directly on this form. Please be sure to attach the signed Certification of Data Accuracy along with your documents.** The information requested may be submitted by email to AQMDannualemissions@nmph.org.



Chapter 030 Source Permitting

Annual Reporting Requirement Changes

- **Permittees are required to continue to monitor and record throughput/emissions related data as required by the Permit to Operate pursuant to Paragraph 030.040.B.11 (Record Keeping)**
 - This information may be requested by the AQMD at any time and will be reviewed during routine Compliance Inspections

Provide a report or spreadsheet that summarizes the production activities for the permitted aggregate plant.

AGGREGATE OPERATIONS

- Provide Plant Diagram(s) demonstrating equipment configuration for previous calendar year
If submitting more than one diagram, please list time period of operation for each diagram
- Calculate Total Tons of Material Processed
- Identify each Crusher and Screen and the amount of material processed through each
- Identify each Conveyor or Stacker and amount of material processed through each

POWER GENERATION

- Size Rating, Tier Value, Make, and Model for each Diesel Engine or Generator
- Total Actual Hours of Equipment Operation using a Diesel Engine or Generator
- Gallons of Diesel used for the Diesel Engine Generator
- Wash Pump Engines: Size & Tier Rating, Total Hours of Operation, and Gallons of Diesel Fuel Consumed



Chapter 030 Source Permitting

Annual Reporting Homework

Review the Permit to Operate issued to your facility

1. Obtain a copy of your current Permit to Operate
2. Review the required Annual Emissions Record Keeping requirements
3. Develop a system to track the throughput/annual emissions data throughout the year

Retain Calendar Year Throughput/Annual Emissions Data

1. Retain records specific to the throughput/annual emissions data for review and possible submittal to the AQMD
2. Calculate emissions on an annual basis to demonstrate the permitted emissions units operated in compliance with all applicable Federal, State, and Health District regulations.

*The AQMD is available to provide assistance in calculating emissions for your facility. Please reach out if you need assistance.

Chapter 030 Source Permitting

Annual Fee Changes

- **Annual Maintenance fee and Annual Emissions fee**
 - All Permits to Construct and Permits to Operate will be assessed an Annual Maintenance fee and an Annual Emissions fee (based on Allowable Emissions)
- **Air Toxics**
 - Any source which emits more than one ton per year of Hazardous Air Pollutants will also be assessed a HAPs Source Maintenance fee and HAP's Source Allowable fee



Chapter 030 Source Permitting

Annual Fee Changes

- **Annual Maintenance fee**
 - All Permits to Construct and Permits to Operate will be assessed an Annual Maintenance fee
- **Annual Emissions fees are based on Allowable Emissions for each source**
 - Allowable emissions have been calculated for each Permit to Operate based on actual emissions from historical Annual Emissions Reports
 - The calculation is based on the highest single criteria pollutant for a source, in tons per year
 - Allowable Emissions for a source will be reassessed during each permit renewal or modification at a source



Chapter 030 Source Permitting

Annual Fee Changes

Annual Emissions		
Annual Maintenance Fee - Minor Source (PTC/PTO)	\$696.00	\$696.00
Annual Emission Fee - Minor Source (Per Pound)	\$24.00	
Annual Emission Fee - Minor Source (Allowable Emissions < 20 tpy)		\$260.00
Annual Emission Fee - Minor Source (Allowable Emissions ≥ 20 and < 40 tpy)		\$650.00
Annual Emission Fee - Minor Source (Allowable Emissions ≥ 40 and < 60 tpy)		\$1,622.00
Annual Emission Fee - Minor Source (Allowable Emissions ≥ 60 and < 80 tpy)		\$4,056.00
Annual Emission Fee - Minor Source (Allowable Emissions ≥ 80 and < 100 tpy)		\$10,140.00
Annual Maintenance Fee - Major Source (PTC/PTO)	\$12,344.00	\$12,344.00
Annual Emission Fee - Major Source	\$10,401.00	\$10,401.00
Annual Maintenance Fee - HAPs Source	\$208.00	\$208.00
Annual Emission Fee - Air Toxics Source (Per Pound)	\$11.00	
Annual Emission Fee - HAPs Source (Allowable ≥ 1 tpy)		\$2,080.00
Air Quality Permit to Operate Late Fee (% of Total Fee Due)	25%	25%



Chapter 030 Source Permitting

Annual Fee Changes

- **Billing**
 - All sources will be notified 15-days in advance of fees being assessed
 - Fees will be assessed on the first day of the month associated with the Permit to Operate's expiration date
 - Invoices will be sent to the email addresses on file for a facility and mailed to the billing address on file
- **Payment**
 - Fees must be paid no later than 30 days after invoicing
 - Failure to pay fees in a timely manner will result in an automatic late fee of 25% of the total fee due
- **Payment through Accela**
 - Electronic payment through Accela is highly encouraged
 - Instructions for making payment: [Accela Payment Instructions](#)



Chapter 030 Source Permitting

Annual Fee Changes Homework

Review the Permit to Operate issued to your facility

1. Obtain a copy of your current Permit to Operate
2. Find the expiration date on the cover page of the Permit
3. Create an appointment in your calendar to review and pay fees associated with your Permit to Operate approximately 30 days prior to the expiration date

Review Fees Assessed and Submit electronic payment within 30-days of invoicing

1. Access the Accela portal by going to: ONENV.US or if necessary, [Create Accela Account](#)
2. In Accela, review the Contact information associated with the Permit to Operate issued to your facility
3. Follow the instructions at the bottom of the invoice or on our website to [Process a Payment in Accela](#)

Chapter 030 Source Permitting

Expiration Date Changes

b. A PTO, whether for a minor or a major source, expires five (5) years from the date of issuance and must be renewed by submitting a complete application. Since a PTC is only required for proposed new sources and for modifications to existing sources, existing sources that are not being modified, but which are, or become, subject to CHAPTER 030, shall be issued a PTO without having to obtain a PTC.

- **Permit Expiration Dates**

- Establishing a new expiration date on all Permits to Operate to complete renewals in the next 6 years
- Facilities with a Permit to Operate will be required to submit a complete application every five years thereafter to renew the Permit to Operate



Chapter 030 Source Permitting

Establishing New Expiration Dates

- To manage the renewals of all Permits to Operate over the next 6 years, a new expiration date will be applied to all Permits to Operate using the matrix below
- Expiration Dates for existing Permits to Operate will change in the following manner:
 - Permits ending in 0 or 5, will expire in 2026
 - Permits ending in 1 or 6, will expire in 2027
 - Permits ending in 2 or 7, will expire in 2028
 - Permits ending in 3 or 8, will expire in 2029
 - Permits ending in 4 or 9, will expire in 2030
- The Permits will be updated with new expiration dates in 2025 during the month the permit expires
 - After annual fees have been paid, the Permit to Operate will be reissued with an expiration date using the matrix above



Chapter 030 Source Permitting

New Expiration Date Example



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AIR QUALITY PERMIT TO OPERATE

Permit #: AAIR16-0100

Permit Expiration Date: 01/31/2025



Chapter 030 Source Permitting

New Expiration Date Example

Permit to Operate No. AAIR16-0100

- This Permit to Operate is due to expire on January 31, 2025
- Permit will be reissued in January 2025 with a new expiration date after annual fees have been paid
- Based on the final digit of the Permit Number (AAIR16-0100) the new expiration date will be January 31, 2026
- Expiration date will establish the timeframe for submitting a renewal application in a timely manner



Chapter 030 Source Permitting

New Expiration Date Example

Permit to Operate No. AAIR16-0100

- With the new expiration date for Permit to Operate No. AAIR16-0104 being **January 31, 2026**:
 - Expiration date will establish the timeframe for submitting a renewal application in a timely manner.
 - **Annual Maintenance and Emissions fees will be assessed on the first day of the month of expiration date**
 - So in this case, Annual Maintenance and Emissions fees will be assessed on January 1 and will be required to be paid by January 30.



Chapter 030 Source Permitting

Permit to Operate Renewal/Expiration Date Timeline

270 Days Prior to
Expiration Date

180 Days Prior To
Expiration Date

Expiration Date

Expired Permits

Complete Application for
Renewal can be submitted
up to 270 days prior to
Expiration Date

Complete Application for
Renewal must be submitted
180 days prior to Expiration
Date to be considered
“Timely”

Complete applications
submitted less than 180
days prior to the Expiration
Date shall not have a permit
shield and the source loses
its ability to operate upon
permit expiration

Failure to submit a Complete
Application prior to the
Expiration Date will require
the cessation of operation
and the submittal of a PTO
application

Chapter 030 Source Permitting

Permit to Operate Renewal Timeline: AAIR16-0100

270 Days Prior to
January 31, 2026

180 Days Prior To
January 31, 2026

Expiration Date
January 31, 2026

Expired Permits

Complete Application for
Renewal can be submitted
on or after **May 6, 2025**

Complete Application for
Renewal must be submitted
by **August 4, 2025** to be
considered “Timely”

Complete application
submitted less than 180
days prior to the Expiration
Date will not have a permit
application shield and the
source loses its ability to
operate upon permit
expiration

Sources will require the
cessation of permitted
emissions units and the
submittal of a PTO
application

Chapter 030 Source Permitting

Expiration Date Change Homework

Review the Permit to Operate issued to your facility

1. Obtain a copy of your current Permit to Operate
2. Locate the Permit to Operate Number on the cover page and apply the last digit of the Permit number to the expiration date change matrix to understand the new expiration date

Calculate Timely Renewal Application Dates

1. Using the new expiration date, calculate the 270 days and 180 days prior to the expiration date to determine the date range to submit a timely renewal application
2. Prepare application in advance of the 270-day mark for a timely submittal to the AQMD
3. Submit complete application between the 270 and 180 day period prior to the expiration date for a timely renewal of the Permit to Operate

Chapter 030 Source Permitting

Public Engagement

- If you have questions:
 - May be submitted via email at AQMDPermitting@nnph.org
 - Call (775) 784-7200 and request to speak to the Permitting Branch
 - Schedule a meeting with the AQMD

To view the revised Chapter 030, recording of this public workshop, and slides from this presentation, please visit the Public Outreach page of our website.

OurCleanAir.com



Upcoming 030 Implementation Workshop

December 11, 2024, 12:00 – 1:00 p.m.

- **Changes to Permits**
 - Change in naming of Source Permits
 - Change in function of Source Permits
 - Conversion from a Construction Permit to an Operating Permit
- **Application Requirements**
 - New Applications, Modification Applications, Change with Notice and Renewal Applications
- **Timelines**
 - Timelines for submitting applications and expected issuance times for applications
- **Best System of Control**
 - What is a Best System of Control, why is it being implemented



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