

**FORM FOR PETITIONING THE STATE ENVIRONMENTAL COMMISSION FOR  
ADOPTION, FILING AMENDMENTS OR REPEAL OF COMMISSION REGULATIONS**

1. Nevada Division of Environmental Protection  
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Carson City, NV 89701-5249  
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2. The Nevada Division of Environmental Protection (NDEP) is a division of the Nevada Department of Conservation and Natural Resources of the State of Nevada. The NDEP is an environmental regulatory agency.
3. Nevada Revised Statutes (NRS) 445B.210 establishes the authority of the State Environmental Commission (SEC) to adopt regulations to prevent, abate and control air pollution. NRS 445B.300 establishes specific authority of the SEC regarding operating permit requirements for sources of air contaminants.

**SPECIFIC CHANGES:**

The NDEP is proposing to revise the requirement for SO<sub>2</sub> emission limits at NV Energy's Reid-Gardner Generating Station (RGGS) located in the California Wash northeast of Las Vegas. The amendments will lower the emission limits from 0.25 lb/10<sup>6</sup> Btu, 24-hour average, to 0.15 lb/10<sup>6</sup> Btu, 24-hour average. Both the 0.25 lb/10<sup>6</sup> Btu and the proposed limit are effective January 1, 2015 or 5 years after approval of Nevada's Regional Haze State Implementation Plan by the U.S. EPA, whichever occurs first.

4. **NEED FOR AND PURPOSE:**

The federal *Regional Haze Regulations; Final Rule* (RHR) promulgated in July 1999 (64FR35714) requires states to establish emission reduction strategies for improving visibility in all 156 mandatory Class I national parks and wilderness areas in the United States. One of the strategies required by the RHR is the application of best available retrofit technology (BART) to certain existing sources. Electrical generating units 1, 2 and 3 at NV Energy's RGGS are subject to the BART

requirement. Further review of the emissions data from RGGGS supports the conclusion that BART for SO<sub>2</sub> at units 1, 2 and 3 is 0.15 lb/Btu, on a 24-hour average.

5. ECONOMIC EFFECTS:

(a) Regulated Business/Industry. No additional control equipment must be installed to meet the lower emission limit. Thus there will be no capitol expenditures imposed on NV Energy due to the amendment.

(a) Public. The proposed regulation will have no economic effect on the public.

(c) Enforcing Agency. There will be no economic effects on NDEP.

6. The proposed amendment does not overlap or duplicate any regulations of other state or government agencies.

7. The proposed amendment is no more stringent than what is established by federal law.

8. The proposed amendment does not address fees.