



September 26, 2019

Ms. Trisha Osborne  
Assistant Commission Secretary  
Public Utilities Commission of Nevada  
1150 East William Street  
Carson City, Nevada 89701-3109

RE: Docket No. 19-05012 - Application of Sierra Pacific Power Company d/b/a NV Energy, under the provisions of the Utility Environmental Protection Act, for a permit to construct to expand the existing West Tracy Substation located in Storey County, Nevada.

Dear Ms. Osborne:

On August 12, 2019, the Public Utilities Commission of Nevada (“Commission”) issued an order approving the application of Sierra Pacific Power Company d/b/a NV Energy (“Sierra”), under the provisions of the Utility Environmental Protection Act, for a permit to construct to expand the existing West Tracy Substation located in Storey County, Nevada (the “Order”). Pursuant to compliance paragraphs 4 and 5 of the Order, Sierra is required to file with the Commission two permits and proof that its request for integrated resource plan approval of the West Tracy Substation project has been approved in Docket No. 19-05003, prior to the Commission issuing the final permit to construct. Attached please find the following two permits:

1. Nevada Division of Environmental Protection, Bureau of Water Pollution Control – General Storm Water Permit; and
2. Nevada Division of Environmental Protection, Bureau of Air Pollution Control – Surface Area Disturbance permit.

In addition, on August 30, 2019, the Commission issued an order in Docket No. 19-05003, which granted the stipulation in that docket. As part of the stipulation, the parties recommended Commission approval of the West Tracy Substation project. See Docket No. 19-05003, Stipulation p. 3-4, paragraph 6.

As a result, Sierra has met all compliances and is filing this letter pursuant to compliance paragraphs 4 and 5 in the Order. Sierra respectfully requests that the Commission issue a permit to construct the West Tracy Substation project.

Should you have any questions regarding this filing, please contact me at (775) 834-5678 or [tclausen@nvenergy.com](mailto:tclausen@nvenergy.com).

Respectfully submitted,

/s/ Tim Clausen  
Tim Clausen  
Senior Attorney

## **ATTACHMENT 1**



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

STATE OF NEVADA  
Department of Conservation & Natural Resources

Steve Sisolak, Governor  
Bradley Crowell, Director  
Greg Lovato, Administrator

**Date: 9/19/2019**

Mr. Lee Simpkins  
NV Energy  
6100 Neil Road  
Reno NV 89511

Dear Mr. Lee Simpkins  
Re: Stormwater Construction Permit  
**Project ID Number: CSW-46679**  
Project Name: West Tracy Substation Expansion

Your submittal to be included under this General Permit has been approved effective 9/19/2019. For Stormwater Permits, please note that by submitting an NOI the permittee has certified that the project's Storm Water Pollution Prevention Plan (SWPPP) has been completed, that the SWPPP will be updated as necessary, and that it will be maintained at the permitted site.

At the time of any on-site inspections, our inspectors will ask to review your copy of the SWPPP in an effort to ensure proper compliance with the program.

Also note that Nevada Administrative Code (NAC) 445A.268 Section (5)(b) reads, in part, that a Permittee (discharger) who is covered under a general permit shall pay to the Director a nonrefundable fee of \$200.00 not later than July 1 of each year that the discharger is covered under that permit.

To Terminate coverage of this Nevada General Permit, the Permittee must submit a Notice of Termination ("NOT") form when their facility no longer has any discharges associated with this Nevada General Permit or EPA regulations at 40 CFR 122.26, or when they are no longer the operator of the site.

Questions regarding Stormwater permits, please contact (775) 687-9442.

Questions regarding other general permits, please contact (775) 687-9492.

Sincerely,

**Andrew Dixon, Supervisor Environmental Scientist**

Bureau of Water Pollution Control  
Nevada Division of Environmental Protection

**CC: Mr. Lee Simpkins 6100 Neil Road Reno NV 89511**

**NVR100000**  
**STATE OF NEVADA**  
**DIVISION OF ENVIRONMENTAL PROTECTION**  
**GENERAL PERMIT**

**FOR**

**STORMWATER DISCHARGES ASSOCIATED WITH LARGE CONSTRUCTION ACTIVITY, SMALL  
CONSTRUCTION ACTIVITY AND INDUSTRIAL ACTIVITY FROM TEMPORARY CONCRETE, ASPHALT  
AND  
MATERIAL PLANTS OR OPERATIONS DEDICATED TO THE PERMITTED CONSTRUCTION  
PROJECT**

**AUTHORIZATION TO DISCHARGE**

In compliance with the provisions of the federal Water Pollution Control Act as amended (33 U.S.C. 1251 et seq: the "Act") and Chapter 445A of the Nevada Revised Statutes (NRS), eligible dischargers have submitted: 1) a Notice of Intent and filing fee in accordance with Nevada Administrative Code (NAC) 445A.268.

In accordance with the terms and conditions set forth hereof;

**Site Number: CSW-46679**

**NOI Approval Date: 9/19/2019**

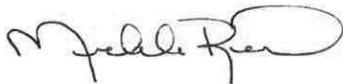
**NOI Re-Approval Date: N/A**

<b>Facility Information</b>	
<b>Site Name</b>	West Tracy Substation Expansion
<b>Site Address</b>	1799 Waltham Way, McCarran, NV 89434-_____
<b>Owner Name</b>	NV Energy
<b>Operator Name</b>	NV Energy

This permit shall become effective on: **January 5, 2015.**

This permit and the authorization to discharge shall expire at midnight **January 4, 2020.**

Signed this **5th** day of **January 2015.**



**Michele R. Reid, Staff II Associate Engineer**  
Bureau of Water Pollution Control

## **ATTACHMENT 2**



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

**STATE OF NEVADA**  
Department of Conservation & Natural Resources

Steve Sisolak, Governor  
Bradley Crowell, Director  
Greg Lovato, Administrator

**September 23, 2019**

Lee R Simpkins, CEM  
Team Leader, Environmental Services Department  
NV Energy  
6100 Neil Road PO Box 10100  
Reno, NV 89511-0024

**RE: Notification of Issuance of Surface Area Disturbance Permit AP1629-4215, FIN  
A0029, Air Case 10207 – Tracy Power Plant**

Dear Mr. Simpkins:

The Nevada Division of Environmental Protection – Bureau of Air Pollution Control (BAPC) has reviewed the application submitted by Nevada Energy on September 16, 2019 for the above-referenced operating permit under legal authority from Nevada Revised Statutes (NRS) 445B.100 through 445B.640, inclusive, and pursuant to regulations in Nevada Administrative Code (NAC) 445B.001 through 445B.3689, inclusive. Based upon technical review and recommendation, I hereby issue the operating permit with appropriate restrictions. Enclosed is your copy of the operating permit which must be posted conspicuously at the facility.

In accordance with NRS 445B.340 and NAC 445B.890, you may appeal the Department's issuance of the operating permit within 10 days after you receive the operating permit. Appeals may be filed with the State Environmental Commission located at 901 S. Stewart Street, Carson City, Nevada 89701. For questions regarding appeals, call (775) 687-9374.

Please review the operating permit carefully and ensure you understand all conditions, restrictions, monitoring, recordkeeping, and other requirements. If you have any questions, contact Scott Cunningham at (775) 687-9353 or [scunningham@ndep.nv.gov](mailto:scunningham@ndep.nv.gov).

Sincerely,

Tanya Soleta, P.E.  
Supervisor, Permitting Branch  
Bureau of Air Pollution Control

TS/sc  
Enclosure: Surface Area Disturbance Permit AP1629-4215  
Certified Mail No. 9171969009350218733612



**Bureau of Air Pollution Control**

901 SOUTH STEWART STREET SUITE 4001

CARSON CITY, NEVADA 89701-5249

p: 775-687-9349 • [ndep.nv.gov/air](http://ndep.nv.gov/air)

**Facility ID No. A0029**

**Permit No. AP1629-4215**

**CLASS II AIR QUALITY OPERATING PERMIT**

**SURFACE AREA DISTURBANCE**

**Issued to:** NV ENERGY

**Mailing Address:** 6100 NEIL ROAD RENO, NV 89511-0024

**Project Address:** 1799 WALTHAM WAY MCCARRAN, NV 89434

**Driving Directions:** FROM CARSON CITY, NV FOLLOW INTERSTATE 395 NORTH UNTIL YOU REACH INTERSTATE 80. MERGE ONTO, AND REMAIN ON, INTERSTATE 80 EAST TOWARDS SPARKS, NV UNTIL YOU REACH WALTHAM WAY. EXIT INTERSTATE 80 AT WALTHAM WAY AND FOLLOW WALTHAM WAY UNTIL YOU REACH THE POWER PLANT. THE CONSTRUCTION IS AT THE WEST END OF THE PLANT.

**General Facility Location:**

SECTION 33, T 20 N, R 22 E, MDB&M  
HA 83 - TRACY SEGMENT / STOREY COUNTY  
NORTH 4,382,234 M, EAST 282,796 M, UTM ZONE 11, NAD 83

**Section I. General Provisions**

- A. Prohibited acts; penalty; establishment of violation; request for prosecution (NRS 445B.470) (*State Only Requirement*)
1. 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. Contents of operating permits; Exception for operating permits to construct; required conditions (NAC 445B.315) (*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.





**Bureau of Air Pollution Control**

***Facility ID No. A0029***

***Permit No. AP1629-4215***

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NV ENERGY

**Section II. General Monitoring, Recordkeeping and Reporting Conditions**

A. Reporting (NAC 445B.315(2)(h)) (*Federally Enforceable SIP Requirement*)

Under the authority of NAC 445B.315(3)(h), the holder of the operating permit shall provide the Director yearly reports including, but not limited to, the status of the surface area disturbance. Such reports shall be submitted on the form provided by the Director for the surface area disturbance specified on the form. The completed form must be submitted to the Director no later than March 1 annually for the preceding calendar year.

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



**Bureau of Air Pollution Control**

**Facility ID No. A0029**

**Permit No. AP1629-4215**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to: NV ENERGY**

**Section III. Surface Area Disturbance Conditions**

Surface area disturbance – 13.8 acres for West Tracy Substation Expansion.

**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 3, 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. The provisions of subsection 2 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.

**B. Posting**

1. The holder of the operating permit shall install a sign constructed and labeled with materials capable of withstanding the strong winds, intense sunlight, and other conditions characteristic of Nevada’s outdoors. The sign must be erected along the major street bordering the property, or at the main entrance to the site, within 50 feet of the border of the property. The sign must be clearly legible from the road and not be obstructed by signs, vehicles, vegetation, or any materials. The sign shall be replaced or repaired should it become damaged or difficult to read.
2. A sign that meets the following criteria will generally meet the requirements of subsection 1:
  - a. Grade A/C plywood 3/4” thick, a minimum of 4 feet by 4 feet in dimension;
  - b. Two 4”x 4” posts with the base of the sign a minimum of 2 feet above ground level;
  - c. A minimum of two (2) carriage bolts for each post to secure the plywood sign to the posts.
3. The front of the sign must be labeled with dark lettering on a contrasting background. The sign shall clearly identify the name of the project, the name of the person responsible for dust control, and provide the telephone number of the person responsible for dust control (valid during daylight hours, seven days a week), the project’s street address (or physical location), and the air quality operating permit number. The sign must remain posted for the life of the permit. A sign labeled in block letters or numerals at least 4” high, in lines spaced 3” apart, in accordance with the following layout will generally meet the requirements of this section:

<b>West Tracy Substation Expansion – 13.8 Acres</b>
<b>Name of person responsible for dust control</b>
<b>In case of dust complaints, please call: (Your Number)</b>
<b>-OR-</b>
<b>Nevada Division Of Environmental Protection: (775) 687-9349</b>
<b>Project street address</b>
<b>BAPC Permit AP1629-4215</b>

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



Bureau of Air Pollution Control

Facility ID No. A0029

Permit No. AP1629-4215

CLASS II AIR QUALITY OPERATING PERMIT

Issued to: NV ENERGY

Section IV. Amendments

N/A

This permit:

1. Is non-transferable. (NAC 445B.287(3)) (*Federally Enforceable SIP Requirement*)
2. Will be posted conspicuously at or near the stationary source. (NAC 445B.318(5)) (*Federally Enforceable SIP Requirement*)
3. Will expire and be subject to renewal five (5) years from: September 23, 2019  
(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 operation 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*)

THIS PERMIT EXPIRES ON: September 23, 2024

Signature 

Issued by: Tanya Soleta, P.E.  
Supervisor, Permitting Branch  
Bureau of Air Pollution Control

Phone: (775) 687-9540

Date: 9/23/2019

1 **CERTIFICATION OF SERVICE**

2 I hereby certify that I have served the foregoing **SIERRA PACIFIC POWER**  
3 **COMPANY D/B/A NV ENERGY'S FILING** in Docket No. 19-05012 upon the persons  
4 listed below by electronic mail:

5 Tammy Cordova Staff Counsel Public Utilities Commission of Nevada 1150 E. William Street 6 Carson City, NV 89701-3109 7 tcordova@puc.nv.gov	Louise Uttinger Assistant Staff Counsel Public Utilities Commission of Nevada 1150 East William Street Carson City, NV 89701-3109 uttinger@puc.nv.gov
9 Greg Lovato Division of Environmental Protection Nevada Department of Conservation and Natural Resources 10 901 S. Stewart Street, Ste. 1003 11 Carson City, NV 89701 12 glovato@ndep.nv.gov	Staff Counsel Division Public Utilities Commission of Nevada 9075 West Diablo Drive Suite 250 Las Vegas, NV 89148 pucn.sc@puc.nv.gov
13 Skip Canfield Nevada Division of State Lands 901 S. Stewart Street, Ste. 5003 14 Carson City, NV 89701-5246 15 nevadaclearinghouse@lands.nv.gov	Attorney General's Office Bureau of Consumer Protection 100 N. Carson St. Carson City, NV 89701 bcpserv@ag.nv.gov
17 Nevada State Clearinghouse Dept. of Administration 901 S. Stewart Street, Ste. 5003 18 Carson City, NV 89701-5246 19 nevadaclearinghouse@lands.nv.gov	Vanessa Stephens Storey County Clerk-Treasurer 26 S. B Street, Drawer D Virginia City, NV 89440 clerk@storeycounty.org

20 DATED this 26<sup>th</sup> day of September, 2019.

21 /s/Lori Petersen  
22 Lori Petersen  
23 Senior Legal Administrative Assistant  
24 Sierra Pacific Power Company  
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