



Bureau of Air Pollution Control (BAPC) Compliance & Enforcement Branch
Penalty Recommendations for State Environmental Commission (SEC) Meeting
June 27, 2018

AGENDA ITEM #4	
COMPANY	Tahoe Western Asphalt, LLC
COUNTY	Carson City
NOAV NUMBER(S)	2635
VIOLATION & PENALTY SUMMARY	<p><u>NOAV 2635</u> Violation: Exceeded permitted emission limit during compliance source testing - NAC 445B.275(1)(c) Date of Observation: April 25, 2017 Requirement: Conduct compliance testing to show the facility is operating in compliance with Air Quality Operating Permit.</p> <p>Base Penalty: Administrative Penalty Matrix – Failed Source Test – Class 2 Source = \$2500.00 x 2 Pollutants = \$5000.00 Deviation Factors: 4.3 Multiple Emission Unit Violations or Recurring Events: 1 system Penalty Adjustment Factors: History of Non-compliance - Recent violations within previous 5 years: 5% x 6 = 30% Total Penalty: (\$5,000 x 4.3) + (\$21,500 x 30%) = \$27,950</p>

AGENDA ITEM #5	
COMPANY	Kennametal, Inc.
COUNTY	Churchill County
NOAV NUMBER(S)	2637
VIOLATION & PENALTY SUMMARY	<p><u>NOAV 2637</u> Violation: Exceeded permitted emission limit during compliance source testing - NAC 445B.275(1)(c) Date of Observation: November 2, 2016 Requirement: Conduct compliance testing to show the facility is operating in compliance with Air Quality Operating Permit.</p> <p>Base Penalty: Administrative Penalty Matrix – Failed Source Test – Class 2 Source (System 08) = \$2500 Deviation Factors: 1.0 Multiple Emission Unit Violations or Recurring Events: 1 system Penalty Adjustment Factors: History of Non-compliance - Recent violations within previous 5 years: 5% x 0 = 0% Total Penalty: (\$2,500 x 1.0) = \$2,500</p> <p>Base Penalty: Administrative Penalty Matrix – Failed Source Test – Class 2 Source (System 10) = \$2500 Deviation Factors: 1.87 Multiple Emission Unit Violations or Recurring Events: 1 system Penalty Adjustment Factors: History of Non-compliance - Recent violations within previous 5 years: 5% x 0 = 0% Total Penalty: (\$2,500 x 1.87) = \$4,675</p> <p>Total Combined Penalty:\$7,175</p>

AGENDA ITEM #6	
COMPANY	Clean Dried Processing, Inc.
COUNTY	Lyon County
NOAV NUMBER(S)	2640
VIOLATION & PENALTY SUMMARY	<p><u>NOAV 2640</u> Violation: Exceeded permitted emission limit during compliance source testing - NAC 445B.275(1)(c) Date of Observation: February 7, 2018 Requirement: Conduct compliance testing to show the facility is operating in compliance with Air Quality Operating Permit.</p> <p>Base Penalty: Administrative Penalty Matrix – Failed Source Test – Class 2 Source = \$2500 Deviation Factors: 1.38 Multiple Emission Unit Violations or Recurring Events: 1 system Penalty Adjustment Factors: History of Non-compliance - Similar Violations (NOAVs) in previous 5 years (Within previous three years (36 months) = +200%) Recent violations within previous 5 years: 5% x 9 = 45% Total Penalty: (\$2,500 x 1.38) + (\$3,450 x 245%) = \$11,902.50</p>