

AGENDA ITEM #4 - CONTINUED

VIOLATION & PENALTY SUMMARY

NOAV 2621

Violation: Failed Visible Emissions Observation for Opacity - **NAC 445B.275(1)(c)**

Date of Observation: April 25, 2017

Requirement: Maintain opacity levels within permitted limit.

Base Penalty: Administrative Penalty Matrix - Failed Method 9 Visible Emissions Observation = \$1,000

Deviation Factors: Volume of Release - Based on Opacity = 1.5

Multiple Emission Unit Violations or Recurring Events: N/A

Penalty Adjustment Factors: History of Non-compliance - Similar violations within previous year = 300%

History of Non-compliance - Recent violations within previous 5 years: 5% x 6 = 30%

Total Penalty: (\$1,000 x 1.5) + (\$1,500 x 330%) = \$6,450

NOAV 2622

Violation: Failed Visible Emissions Observation for Opacity - **NAC 445B.275(1)(c)**

Date of Observation: April 27, 2017

Requirement: Maintain opacity levels within permitted limit.

Base Penalty: Administrative Penalty Matrix - Failed Method 9 Visible Emissions Observation = \$1,000

Deviation Factors: Volume of Release - Based on Opacity = 2.5

Multiple Emission Unit Violations or Recurring Events: N/A

Penalty Adjustment Factors: History of Non-compliance - Similar violations within previous year = 300%

History of Non-compliance - Recent violations within previous 5 years: 5% x 7 = 35%

Total Penalty: (\$1,000 x 2.5) + (\$2,500 x 335%) = \$10,875

NOAV 2623

Violation: Failed Visible Emissions Observation for Opacity - **NAC 445B.275(1)(c)**

Date of Observation: April 28, 2017

Requirement: Maintain opacity levels within permitted limit.

Base Penalty: Administrative Penalty Matrix - Failed Method 9 Visible Emissions Observation = \$1,000

Deviation Factors: Volume of Release - Based on Opacity = 1.5

Multiple Emission Unit Violations or Recurring Events: N/A

Penalty Adjustment Factors: History of Non-compliance - Similar violations within previous year = 300%

History of Non-compliance - Recent violations within previous 5 years: 5% x 8 = 40%

Total Penalty: (\$1,000 x 1.5) + (\$1,500 x 340%) = \$6,600

TOTAL RECOMMENDED PENALTY

\$33,045