

Bureau of Air Quality Planning (BAQP) Enforcement Branch
Penalty Recommendations for the March 19, 2025 State Environmental Commission Meeting

AGENDA ITEM #4	
COMPANY	Safety-Kleen Systems, Inc.
COUNTY	Churchill County
NOAV NUMBER(S)	3069 and 3150
VIOLATION & PENALTY SUMMARY	<p><u>NOAV 3069</u> Violation: Failure to Comply with the Conditions of an Operating Permit: Exceedance of an Operational Limit Date of Observation: May 4, 2023 Requirement: All throughput limits in the permit must be observed Base Penalty: According to Administrative Penalty Matrix, the base penalty for failure to comply with conditions of an operating permit for a Class 2 Source is \$600 per standard of operating parameter Multiple Emission Unit Violations or Recurring Events: 11 events Penalty Subtotal: (\$600.00 base penalty x 11 events) = \$6,600 Economic Benefit (avoided costs): N/A Penalty Adjustment Factors: N/A Total Penalty: (\$6,600.00 + \$0.00) = \$6,600.00</p> <p><u>NOAV 3150</u> Violation: Failed Source Test Date of Observation: Multiple Requirement: Emissions measured during a source test must be below permitted emission limits Base Penalty: According to Administrative Penalty Matrix, the base penalty for a failed source test for a Class 2 Source is \$2,500 per pollutant multiplied by the ratio of measured emissions to permitted emissions Penalty explanation: As there were multiple systems and pollutants that failed over multiple days, specific calculations can be found in the Air Penalty Presentation Section Economic Benefit (avoided costs): N/A Penalty Adjustment Factors: N/A Total Penalty: \$29,150.00</p>
TOTAL RECOMMENDED PENALTY	\$35,750.00