



**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. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO (HEREINAFTER REFERRED TO AS PERMITTEE)

**Mailing Address:** 1285 BARING BOULEVARD, #716, SPARKS, NEVADA 89434

**Physical Address:** 611 PERU DRIVE, MCCARRAN, NEVADA 89434

**Driving Directions:** FROM SPARKS, NEVADA, TRAVEL EAST ON INTERSTATE 80 FOR 14.3 MILES TO EXIT 28 (PATRICK EXIT/WALTHAM WAY). TRAVEL 2.5 MILES SOUTH/SOUTHEAST ON WALTHAM WAY TO PERU DRIVE. TURN RIGHT ON PERU DRIVE, TRAVEL 0.72 MILES TO FACILITY.

**General Facility Location:** SECTION 33, T 20 N, R 22 E, MDB&M  
 HA 83 – TRACY SEGMENT / STOREY COUNTY  
 NORTH 4,381,211 M, EAST 283,522 M, UTM ZONE 11, NAD 83

**Emission Unit List:**

**A. System 1 – Natural Gas Fired Heater #1 (Revised - July 2025, Air Case # 11992)**

S2.002 24.3 MMBtu/hr Natural Gas Fired Heater #1

**B. System 2 – Water Cooling Tower #2 (Revised - July 2025, Air Case # 11992)**

S2.004 Water Cooling Tower #2

**C. System 3 – Hydrogen Reformer (Revised - July 2025, Air Case # 11992)**

S2.005 105.75 MMBtu/hr Hydrogen Reformer (includes 3 burners, each rated at 35.25 MMBtu/hr, combusting natural gas during normal operations, or off-gasses during start-up, shutdown, malfunction operations)

**D1. System 4A – Standby Diesel Generator #1 (Revised - July 2025, Air Case # 11992)**

S2.006 Standby Diesel Generator #1 (2882 HP, Tier 1)

**D2. System 4B – Standby Diesel Generator #2 (Revised - July 2025, Air Case # 11992)**

S2.020 Standby Diesel Generator #2 (2935 HP, mfr Detroit, mfd 2002)

**E1. System 5 – Enclosed Ground Oxidizer – Normal Operations (Revised - July 2025, Air Case # 11992)**

S2.007 Enclosed Ground Oxidizer (combusts up to 12.29 MMBtu/hr Off-Gases)

**E2. System 5alt – Enclosed Ground Oxidizer – Alternate Operating Scenario (Revised - July 2025, Air Case # 11992)**

S2.007alt Enclosed Ground Oxidizer (combusts up to 12.29 MMBtu/hr Off-Gases and up to 79.7 MMBtu/hr Isom Stripper Gas)

**F. System 6 – SAF (Sustainable Aviation Fuel) and Naphtha Storage Tanks (Revised - July 2025, Air Case # 11992)**

- S2.008 ~~500,000 Gallon Corn Oil Tank~~ (reclassified as IA1.009)
- S2.012 ~~1,000,000 Gallon Corn Oil Tank~~ (reclassified as IA1.010)
- S2.009 220,000 Gallon SAF Guard Tank #1
- S2.010 220,000 Gallon SAF Guard Tank #2
- S2.013 220,000 Gallon SAF Guard Tank #4
- S2.014 220,000 Gallon SAF Guard Tank #3
- S2.015 300,000 Gallon SAF Guard Tank
- S2.033 25,000 Gallon SAF Tank #1 (previously IA1.003)
- S2.034 25,000 Gallon SAF Tank #2 (previously IA1.004)
- S2.031 25,000 Gallon Naphtha Tank #1 (internal floating roof) (previously IA1.001)
- S2.032 25,000 Gallon Naphtha Tank #2 (internal floating roof) (previously IA1.002)
- S2.021 25,000 Gallon Naphtha Tank #3 (internal floating roof) (previously IA1.005)
- S2.022 25,000 Gallon Naphtha Tank BD1 (internal floating roof) (previously IA1.006)
- S2.023 25,000 Gallon Naphtha Tank BD2 (internal floating roof) (previously IA1.007)
- S2.024 25,000 Gallon Naphtha Tank BD3 (internal floating roof) (previously IA1.008)



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**Emission Unit List (Continued):**

**G. System 7 – 500 Ton Cooling Tower (Revised - July 2025, Air Case # 11992)**

S2.016 500 Ton Cooling Tower

**H1. System 8A – Natural Gas Fired Boiler #1 (Revised - July 2025, Air Case # 11992)**

S2.017 4.2 MMBtu/hr Natural Gas Fired Boiler #1 (mfr Superior Boiler, mfd 2018)

**H2. System 8B – Natural Gas Fired Boiler #2 (Revised - July 2025, Air Case # 11992)**

S2.018 21.0 MMBtu/hr Natural Gas Fired Boiler #2 (mfr Webster Combustion, mfd 2018)

**H3. System 8C – Natural Gas Fired Boiler #3 (Revised - July 2025, Air Case # 11992)**

S2.019 10.1 MMBtu/hr Natural Gas Fired Boiler #3 (mfr Victory Boiler, mfd 2022)

**I. System 9 – Diesel Fire Pump Engines (Added - July 2025, Air Case # 11992)**

S2.025 Diesel Fire Suppression Pump Engine #1 (East), (350HP Clarke Fire Pump; John Deere Engine, mdl # 6090HFC47, mfd 2018)

S2.026 Diesel Fire Suppression Pump Engine #2 (West), (350HP Clarke Fire Pump; John Deere Engine, mdl # 6090HFC47, mfd 2018)

**J. System 10 – Fugitive Emissions from Equipment Components (Added – July 2025, Air Case 11992)**

PF1.001a Valves – Gas Service

PF1.001b Valves – Light Liquid Service

PF1.001c Single Pump Seals

PF1.001d Connectors

PF1.001e Flanges

PF1.001f Pressure Relief Valves and Sampling Connections

**K. System 11 – Emergency Flare (Added - July 2025, Air Case # 11992)**

S2.027 Emergency Flare for Process Emissions with 0.065 MMBtu/hr Natural Gas Pilot Light

**L. System 12 – Transloading of Naphtha and SAF (Sustainable Aviation Fuel) (Added - July 2025, Air Case # 11992)**

S2.028 Truck/Rail Transloading – Naphtha

S2.029 Truck/Rail Transloading – SAF

S2.030a 0.063 MMBtu/hr Natural Gas Flare Pilot Light for Truck Loading

S2.030b 0.063 MMBtu/hr Natural Gas Flare Pilot Light for Rail Loading

**\*\*\*\*End of Emission Unit List\*\*\*\***



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**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. Visible emissions: Maximum opacity; determination and monitoring of opacity (NAC 445B.22017) (*Federally Enforceable SIP Requirement*)
1. Except as otherwise provided in this section and NAC 445B.2202, no owner or operator may cause or permit the discharge into the atmosphere from any emission unit which is of an opacity equal to or greater than 20 percent. Opacity must be determined by one of the following methods:
    - a. If opacity is determined by a visual measurement, it must be determined as set forth in Reference Method 9 in Appendix A of 40 CFR Part 60.
    - b. If a source uses a continuous monitoring system for the measurement of opacity, the data must be reduced to 6-minute averages as set forth in 40 CFR 60.13(h).
  2. The provisions of this section and NAC 445B.2202 do not apply to that part of the opacity that consists of uncombined water. The burden of proof to establish the application of this exemption is upon the person seeking to come within the exemption.
  3. If the provisions of 40 CFR Part 60, Subpart D or Da apply to an emission unit, the emission unit must be allowed one 6-minute period per hour of not more than 27 percent opacity as set forth in 40 CFR 60.42(a)(2) and 40 CFR 60.42a(b).
  4. The continuous monitoring system for monitoring opacity at a facility must be operated and maintained by the owner or operator specified in the permit for the facility in accordance with NAC 445B.256 to 445B.267, inclusive.
- C. Visible emissions: Exceptions for stationary sources (NAC 445B.2202) (*Federally Enforceable SIP Requirement*)
- The provisions of NAC 445B.22017 do not apply to:
1. Smoke from the open burning described in NAC 445B.22067;
  2. Smoke discharged in the course of training air pollution control inspectors to observe visible emissions, if the facility has written approval of the Commission;
  3. Emissions from an incinerator as set forth in NAC 445B.2207; or
  4. Emissions of stationary diesel-powered engines during warm-up for not longer than 15 minutes to achieve operating temperatures.



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**Section I. General Provisions (continued)**

D. Odors (NAC 445B.22087) (*State Only Requirement*)

1. No person may discharge or cause to be discharged, from any stationary source, any material or regulated air pollutant which is or tends to be offensive to the senses, injurious or detrimental to health and safety, or which in any way interferes with or prevents the comfortable enjoyment of life or property.
2. The Director shall investigate an odor when 30 percent or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy. The sample must be at least 20 people or 75 percent of those exposed if fewer than 20 people are exposed.
3. The Director shall deem the odor to be a violation if he or she is able to make two odor measurements within a period of 1 hour. These measurements must be separated by at least 15 minutes. An odor measurement consists of a detectable odor after the odorous air has been diluted with eight or more volumes of odor-free air.

E. Prohibited Conduct: Concealment of Emissions (NAC 445B.225) (*Federally Enforceable SIP Requirement*)

No person may install, construct or use any device which conceals any emission without reducing the total release of regulated air pollutants to the atmosphere.

F. Prohibited conduct: Operation of source without required equipment; removal or modification of required equipment; modification of required procedure (NAC 445B.227) (*Federally Enforceable SIP Requirement*)

Except as otherwise provided in NAC 445B.001 to 445B.390, inclusive, no person may:

1. Operate a stationary source of air pollution unless the control equipment for air pollution which is required by applicable requirements or conditions of this Operating Permit is installed and operating.
2. Disconnect, alter, modify or remove any of the control equipment for air pollution or modify any procedure required by an applicable requirement or condition of the permit.

G. Excess Emissions (NAC 445B.232) (*State Only Requirement*)

1. Scheduled maintenance or testing or scheduled repairs which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.390, inclusive, must be approved in advance by the Director and performed during a time designated by the Director as being favorable for atmospheric ventilation.
2. Each owner or operator shall notify the Director of the proposed time and expected duration at least 30 days before any scheduled maintenance or testing which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.390, inclusive. The scheduled maintenance or testing must not be conducted unless the scheduled maintenance or testing is approved pursuant to subsection 1.
3. Each owner or operator shall notify the Director of the proposed time and expected duration at least 24 hours before any scheduled repairs which may result in excess emissions of regulated air pollutants prohibited by NAC 445B.001 to 445B.390, inclusive. The scheduled repairs must not be conducted unless the scheduled repairs are approved pursuant to subsection 1.
4. Each owner or operator shall notify the Director of any excess emissions within 24 hours after any malfunction or upset of the process equipment or equipment for controlling pollution or during start-up or shutdown of that equipment.



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**Section I. General Provisions (continued)**

G. Excess Emissions (NAC 445B.232) (*State Only Requirement*) (continued)

5. Each owner or operator shall provide the Director, within 15 days after any malfunction, upset, start-up, shutdown or human error which results in excess emissions, sufficient information to enable the Director to determine the seriousness of the excess emissions. The information must include at least the following:
  - a. The identity of the stack or other point of emission, or both, where the excess emissions occurred.
  - b. The estimated magnitude of the excess emissions expressed in opacity or in the units of the applicable limitation on emission and the operating data and methods used in estimating the magnitude of the excess emissions.
  - c. The time and duration of the excess emissions.
  - d. The identity of the equipment causing the excess emissions.
  - e. If the excess emissions were the result of a malfunction, the steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of the malfunction.
  - f. The steps taken to limit the excess emissions.
  - g. Documentation that the equipment for controlling air pollution, process equipment or processes were at all times maintained and operated, to a maximum extent practicable, in a manner consistent with good practice for minimizing emissions.
6. Each owner or operator shall ensure that any notification or related information submitted to the Director pursuant to this section is provided in a format specified by the Director.

H. Testing and Sampling (NAC 445B.252) (*Federally Enforceable SIP Requirement*)

1. To determine compliance with NAC 445B.001 to 445B.390, inclusive, before the approval or the continuance of an operating permit or similar class of permits, the Director may either conduct or order the owner of any stationary source to conduct or have conducted such testing and sampling as the Director determines necessary. Testing and sampling or either of them must be conducted and the results submitted to the Director within 60 days after achieving the maximum rate of production at which the affected facility will be operated, but not later than 180 days after initial start-up of the facility and at such other times as may be required by the Director.
2. Tests of performance must be conducted and data reduced in accordance with the methods and procedures of the test contained in each applicable subsection of this section unless the Director:
  - a. Specifies or approves, in specific cases, the use of a method of reference with minor changes in methodology;
  - b. Approves the use of an equivalent method;
  - c. Approves the use of an alternative method, the results of which the Director has determined to be adequate for indicating whether a specific stationary source is in compliance; or
  - d. Waives the requirement for tests of performance because the owner or operator of a stationary source has demonstrated by other means to the Director's satisfaction that the affected facility is in compliance with the standard.
3. Tests of performance must be conducted under such conditions as the Director specifies to the operator of the plant based on representative performance of the affected facility. The owner or operator shall make available to the Director such records as may be necessary to determine the conditions of the performance test. Operations during periods of startup, shutdown and malfunction must not constitute representative conditions of a performance test unless otherwise specified in the applicable standard.
4. The owner or operator of an affected facility shall give notice to the Director 30 days before the test of performance to allow the Director to have an observer present. A written testing procedure for the test of performance must be submitted to the Director at least 30 days before the test of performance to allow the Director to review the proposed testing procedures.
5. Each test of performance must consist of at least three separate runs using the applicable method for that test. Each run must be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the runs apply. In the event of forced shutdown, failure of an irreplaceable portion of the sampling train, extreme meteorological conditions or other circumstances with less than three valid samples being obtained, compliance may be determined using the arithmetic mean of the results of the other two runs upon the Director's approval.
6. All testing and sampling will be performed in accordance with recognized methods and as specified by the Director.



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**Section I. General Provisions (continued)**

H. Testing and Sampling (NAC 445B.252) (*Federally Enforceable SIP Requirement*) (continued)

7. The cost of all testing and sampling and the cost of all sampling holes, scaffolding, electric power and other pertinent allied facilities as may be required and specified in writing by the Director must be provided and paid for by the owner of the stationary source.
8. All information and analytical results of testing and sampling must be certified as to their truth and accuracy and as to their compliance with all provisions of these regulations, and copies of these results must be provided to the Director no later than 60 days after the testing or sampling, or both.
9. Notwithstanding the provisions of subsection 2, the Director shall not approve an alternative method or equivalent method to determine compliance with a standard or emission limitation contained in Part 60, 61 or 63 of Title 40 of the Code of Federal Regulations for:
  - a. An emission unit that is subject to a testing requirement pursuant to Part 60, 61 or 63 of Title 40 of the Code of Federal Regulations; or
  - b. An affected source.

I. Permit Revision (NAC 445B.287(1)(b)) (*Federally Enforceable SIP Requirement*)

If a stationary source is a Class II source, a revision of the operating permit or the permit to construct is required pursuant to the requirements of NAC 445B.3465 before the stationary source may be modified.

J. Violations: Acts constituting; notice (NAC 445B.275) (*Federally Enforceable SIP Requirement*)

1. Failure to comply with any requirement of NAC 445B.001 to 445B.390, inclusive, any applicable requirement or any condition of an operating permit constitutes a violation. As required by NRS 445B.450, the Director shall issue a written notice of an alleged violation to any owner or operator for any violation, including, but not limited to:
  - a. Failure to apply for and obtain an operating permit;
  - b. Failure to construct a stationary source in accordance with the application for an operating permit as approved by the Director;
  - c. Failure to construct or operate a stationary source in accordance with any condition of an operating permit;
  - d. Commencing construction or modification of a stationary source without applying for and receiving an operating permit or a modification of an operating permit as required by NAC 445B.001 to 445B.3477, inclusive, or a mercury operating permit to construct as required by NAC 445B.3611 to 445B.3689, inclusive;
  - e. Failure to comply with any requirement for recordkeeping, monitoring, reporting or compliance certification contained in an operating permit; or
  - f. Failure to pay fees as required by NAC 445B.327 or 445B.3689.
2. The written notice must specify the provision of NAC 445B.001 to 445B.390, inclusive, the condition of the operating permit or the applicable requirement that is being violated.
3. Written notice shall be deemed to have been served if delivered to the person to whom addressed or if sent by registered or certified mail to the last known address of the person.

K. Operating permits: Imposition of more stringent standards for emissions (NAC 445B.305)

(*Federally Enforceable SIP Requirement*)

1. The Director may impose standards for emissions on a proposed stationary source that are more stringent than those found in NAC 445B.001 to 445B.390, inclusive, as a condition of approving an operating permit for the proposed stationary source.



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**Section I. General Provisions (continued)**

L. 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.
  - d. The holder of the operating permit shall comply with all conditions of the operating permit. Any noncompliance constitutes a violation and is a ground for:
    - (1) An action for noncompliance;
    - (2) Revising, revoking, reopening and revising, or terminating the operating permit by the Director; or
    - (3) Denial of an application for a renewal of the operating permit by the Director.
  - e. The need to halt or reduce activity to maintain compliance with the conditions of the operating permit is not a defense to noncompliance with any condition of the operating permit.
  - f. The Director may revise, revoke and reissue, reopen and revise, or terminate the operating permit for cause.
  - g. The operating permit does not convey any property rights or any exclusive privilege.
  - h. The holder of the operating permit shall provide the Director, in writing and within a reasonable time, with any information that the Director requests to determine whether cause exists for revising, revoking and reissuing, reopening and revising, or terminating the operating permit, or to determine compliance with the conditions of the operating permit.
  - i. The holder of the operating permit shall pay fees to the Director in accordance with the provisions set forth in NAC 445B.327 and 445B.331.
  - j. The holder of the operating permit shall allow the Director or any authorized representative, upon presentation of credentials, to:
    - (1) Enter upon the premises of the holder of the operating permit where:
      - (a) The stationary source is located;
      - (b) Activity related to emissions is conducted; or
      - (c) Records are kept pursuant to the conditions of the operating permit;
    - (2) Have access to and copy, during normal business hours, any records that are kept pursuant to the conditions of the operating permit;
    - (3) Inspect, at reasonable times, any facilities, practices, operations or equipment, including any equipment for monitoring or controlling air pollution, that are regulated or required pursuant to the operating permit; and
    - (4) Sample or monitor, at reasonable times, substances or parameters to determine compliance with the conditions of the operating permit or applicable requirements.
  - k. A responsible official of the stationary source shall certify that, based on information and belief formed after a reasonable inquiry, the statements made in any document required to be submitted by any condition of the operating permit are true, accurate and complete.



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**Section I. General Provisions (continued)**

M. Operating permits: Revocation and reissuance (NAC 445B.3265) (*State Only Requirement*)

1. An operating permit may be revoked if the control equipment is not operating.
2. An operating permit may be revoked by the Director upon determining that there has been a violation of NAC 445B.001 to 445B.390, inclusive, or the provisions of 40 CFR 52.21, or 40 CFR Part 60 or 61, Prevention of Significant Deterioration, New Source Performance Standards, and National Emission Standards for Hazardous Air Pollutants, adopted by reference in NAC 445B.221.
3. The revocation is effective 10 days after the service of a written notice, unless a hearing is requested.
4. To reissue a revoked operating permit, the holder of the revoked permit must file a new application with the Director, accompanied by the fee for an initial operating permit as specified in NAC 445B.327. An environmental review of the stationary source must be conducted as though construction had not yet commenced.

N. Required contents of permit (NAC 445B.346) (*Federally Enforceable SIP Requirement*)

In addition to the conditions set forth in NAC 445B.315, Class II operating permits must contain, as applicable:

1. Emission limitations and standards, including those operational requirements and limitations that ensure compliance with the conditions of the operating permit.
2. All requirements for monitoring, testing and reporting that apply to the stationary source.
3. A requirement that the owner or operator of the stationary source promptly report any deviations from any requirements of the operating permit.
4. The terms and conditions for any reasonably anticipated alternative operating scenarios identified by the owner or operator of the stationary source in his or her application and approved by the Director. Such terms and conditions must require the owner or operator to keep a contemporaneous log of changes from one alternative operating scenario to another.
5. A schedule of compliance for stationary sources that are not in compliance with any applicable requirement or NAC 445B.001 to 445B.390, inclusive:
  - a. Semiannual progress reports and a schedule of dates for achieving milestones;
  - b. Prior notice of and explanations for missed deadlines; and
  - c. Any preventive or corrective measures taken.

**\*\*\*End of General Provisions\*\*\***



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

A. Records Retention (NAC 445B.315(3)(b)) (*Federally Enforceable SIP Requirement*)

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.

B. Deviations (NAC 445B.346(3)) (*Federally Enforceable SIP Requirement*)

Under the authority of NAC 445B.346(3), and in addition to the conditions set forth in NAC 445B.315, the owner or operator of the stationary source shall promptly report to the Director any deviations from the requirements of the operating permit. The report to the Director shall include the probable cause of all deviations and any action taken to correct the deviations. For the operating permit, prompt is defined as submittal of a report within 15 days of the deviation. This definition does not alter any reporting requirements as established for reporting of excess emissions as required under NAC 445B.232 as reproduced in **Section I.G.**

**E-mail notifications to:** [aircompliance@ndep.nv.gov](mailto:aircompliance@ndep.nv.gov)

C. Yearly Reports (NAC 445B.315(3)(h), NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

Under the authority of NAC 445B.315(3)(h) and NAC 445B.346(2) the Permittee will submit yearly reports including, but not limited to, throughput, production, fuel consumption, hours of operation, emissions and supporting documentation to support the calculation of annual emissions. These reports and supporting documentation (if applicable) will be submitted via the State and Local Emissions Inventory System (SLEIS) maintained by the Bureau of Air Quality Planning for all emission units/systems specified. The completed report must be submitted to the Bureau of Air Quality Planning no later than March 1 annually for the preceding calendar year.

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



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**Section III. General Construction Conditions**

A. Notification (NAC 445B.250; NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

Under the authority of NAC 445B.250 and NAC 445B.346; the Director shall be notified in writing of the following for **S2.002, S2.004 through S2.007, S2.007alt, S2.009, S2.010, S2.013 through S2.034, PF1.001a through PF1.001f**:

1. The date construction (or reconstruction as defined under NAC 445B.247) of the affected facility is commenced, postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form.
2. The anticipated date of initial startup of an affected facility, postmarked no more than 60 days and no less than 30 days prior to such date.
3. The actual date of initial startup of the affected facility, postmarked within 15 days after such date.
4. The date upon which demonstration of the continuous monitoring system performance commences in accordance with NAC 445B.256 to 445B.267, inclusive. Notification must be postmarked not less than 30 days before such date.

**\*\*\*End of General Construction Conditions\*\*\***



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section IV. Specific Construction Requirements**

A. Initial Opacity Compliance Demonstration and Initial Performance Tests (NAC 445B.22017, NAC 445B.252, NAC 445B.346(2))  
(Federally Enforceable SIP Requirement)

1. Under the authority of NAC 445B.22017, NAC 445B.252, and NAC 445B.346, the Permittee, upon issuance of this operating permit, shall conduct initial opacity compliance demonstrations and/or initial performance tests within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup. The Permittee shall follow the test methods and procedures referenced in Table IV-1 and Table IV-2 below:

**Table IV-1: Initial Opacity Compliance Demonstration**

System	Emission Unit(s)	Pollutant To Be Tested	Testing Methods/Procedures
System 1 – Natural Gas Fired Heater #1	S2.002	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
System 2 – Water Cooling Tower #2	S2.004	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
System 3 – Hydrogen Reformer	S2.005 Normal Operations	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
System 4A – Standby Diesel Generator #1	S2.006	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
System 4B – Standby Diesel Generator #2	S2.020	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
System 5 – Enclosed Ground Oxidizer	S2.007 Off-Gases Scenario 1	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.



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**Facility ID No. A1107**

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**Section IV. Specific Construction Requirements (continued)**

A. Initial Opacity Compliance Demonstration and Initial Performance Tests (NAC 445B.22017, NAC 445B.252, NAC 445B.346(2))  
(*Federally Enforceable SIP Requirement*) (continued)

**Table IV-1: Initial Opacity Compliance Demonstration (continued)**

System	Emission Unit(s)	Pollutant To Be Tested	Testing Methods/Procedures
System 5 – Enclosed Ground Oxidizer (Alternative Operations)	S2.007alt Isom Stripper Gases + Off-Gases Scenario 2	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
System 7 – 500 Ton Cooling Tower	S2.016	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
System 8A – Natural Gas Fired Boiler #1	S2.017	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
System 8B – Natural Gas Fired Boiler #2	S2.018	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
System 8C – Natural Gas Fired Boiler #3	S2.019	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
System 9 – Diesel Fire Pump Engines	S2.025 and S2.026	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
System 11 – Emergency Flare	S2.027 Normal Operations	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section IV. Specific Construction Requirements (continued)**

A. Initial Opacity Compliance Demonstration and Initial Performance Tests (NAC 445B.22017, NAC 445B.252, NAC 445B.346(2))  
(Federally Enforceable SIP Requirement) (continued)

**Table IV-1: Initial Opacity Compliance Demonstration (continued)**

System	Emission Unit(s)	Pollutant To Be Tested	Testing Methods/Procedures
System 12 – Truck Transload of Naphtha and SAF	S2.028a S2.028b S2.030a Flaring Operations	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
System 12 – Rail Transload of Naphtha and SAF	S2.029a S2.029b S2.030b Flaring Operations	Opacity	Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.

**Table IV-2: Initial Performance Tests**

System	Emission Unit(s)	Pollutants To Be Tested	Testing Methods/Procedures
System 1 – Natural Gas Fired Heater #1	S2.002	NO <sub>x</sub>	Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
		CO	Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
System 2 – Water Cooling Tower #2	S2.004	TDS	Sample the cooling tower circulating feed water from <b>S2.004</b> and determine the total dissolved solids (TDS, reported in mg per liter, or ppm by weight). The TDS concentration will be determined using Standard Method 2540 C-2011 or ASTM Method D5907-13, or alternative methods approved in advance by the Director.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section IV. Specific Construction Requirements (continued)**

A. Initial Opacity Compliance Demonstration and Initial Performance Tests (NAC 445B.22017, NAC 445B.252, NAC 445B.346(2))  
(Federally Enforceable SIP Requirement) (continued)

**Table IV-2: Initial Performance Tests (continued)**

System	Emission Unit(s)	Pollutants To Be Tested	Testing Methods/Procedures
System 3 – Hydrogen Reformer	S2.005 Normal Operations	PM	Method 5 in Appendix A of 40 CFR Part 60 shall be used to determine PM emissions. The sample volume for each test run shall be at least 1.7 dscm (60 dscf). Test runs must be conducted for up to two hours in an effort to collect this minimum sample.
		PM <sub>10</sub> /PM <sub>2.5</sub>	Method 201A and Method 202 in Appendix M of 40 CFR Part 51 shall be used to determine PM <sub>10</sub> and PM <sub>2.5</sub> emissions. The sample time and sample volume collected for each test run shall be sufficient to collect enough mass to weigh accurately. The Method 201A and 202 test required in this section may be replaced by a Method 5 in Appendix A of 40 CFR Part 60 and Method 202 in Appendix M of 40 CFR Part 51 test. All particulate captured in the Method 5 and Method 202 test performed under this provision shall be considered PM <sub>2.5</sub> for determination of compliance.
		SO <sub>2</sub>	Method 6C in Appendix A of 40 CFR Part 60 shall be used to determine the sulfur dioxide concentration. Each test will be run for a minimum of one hour.
		NO <sub>x</sub>	Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
		CO	Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
		VOC	Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section IV. Specific Construction Requirements (continued)**

A. Initial Opacity Compliance Demonstration and Initial Performance Tests (NAC 445B.22017, NAC 445B.252, NAC 445B.346(2))  
(Federally Enforceable SIP Requirement) (continued)

**Table IV-2: Initial Performance Tests (continued)**

System	Emission Unit(s)	Pollutants To Be Tested	Testing Methods/Procedures
System 5 – Enclosed Ground Oxidizer	S2.007 Off-Gasses Scenario 1	PM	Method 5 in Appendix A of 40 CFR Part 60 shall be used to determine PM emissions. The sample volume for each test run shall be at least 1.7 dscm (60 dscf). Test runs must be conducted for up to two hours in an effort to collect this minimum sample.
		PM <sub>10</sub> /PM <sub>2.5</sub>	Method 201A and Method 202 in Appendix M of 40 CFR Part 51 shall be used to determine PM <sub>10</sub> and PM <sub>2.5</sub> emissions. The sample time and sample volume collected for each test run shall be sufficient to collect enough mass to weigh accurately. The Method 201A and 202 test required in this section may be replaced by a Method 5 in Appendix A of 40 CFR Part 60 and Method 202 in Appendix M of 40 CFR Part 51 test. All particulate captured in the Method 5 and Method 202 test performed under this provision shall be considered PM <sub>2.5</sub> for determination of compliance.
	S2.007alt Isom Stripper Gasses and Off-Gasses Scenario 2	SO <sub>2</sub>	Method 6C in Appendix A of 40 CFR Part 60 shall be used to determine the sulfur dioxide concentration. Each test will be run for a minimum of one hour.
		NO <sub>x</sub>	Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
		CO	Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
		VOC	Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour.
System 6 – SAF and Naphtha Storage Tanks	S2.009 S2.010 S2.015 S2.021 S2.022 S2.023 S2.024 S2.031 S2.032 S2.033 S2.034	40CFR60 Subpart Kb Subpart Kc Requirements	Refer to Section V.F. of this operating permit for initial testing and procedures.
System 7 – 500 Ton Water Cooling Tower	S2.016	TDS	Sample the cooling tower circulating feed water from <b>S2.016</b> and determine the total dissolved solids (TDS, reported in mg per liter, or ppm by weight). The TDS concentration will be determined using Standard Method 2540 C-2011 or ASTM Method D5907-13, or alternative methods approved in advance by the Director.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section IV. Specific Construction Requirements (continued)**

A. Initial Opacity Compliance Demonstration and Initial Performance Tests (NAC 445B.22017, NAC 445B.252, NAC 445B.346(2))  
(Federally Enforceable SIP Requirement) (continued)

**Table IV-2: Initial Performance Tests (continued)**

System	Emission Unit(s)	Pollutant To Be Tested	Testing Methods/Procedures
System 8A – Natural Gas Fired Boiler #1	S2.017	NO <sub>x</sub>	Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
System 8B – Natural Gas Fired Boiler #2	S2.018	CO	Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
System 8C – Natural Gas Fired Boiler #3	S2.019		
System 12 – <b>Truck Transload</b> of Naphtha and SAF  <b>and</b>  System 12 – <b>Rail Transload</b> of Naphtha and SAF	S2.030a Flaring Operations  <b>and</b>  S2.030b Flaring Operations	PM	Method 5 in Appendix A of 40 CFR Part 60 shall be used to determine PM emissions. The sample volume for each test run shall be at least 1.7 dscm (60 dscf). Test runs must be conducted for up to two hours in an effort to collect this minimum sample.
		PM <sub>10</sub> /PM <sub>2.5</sub>	Method 201A and Method 202 in Appendix M of 40 CFR Part 51 shall be used to determine PM <sub>10</sub> and PM <sub>2.5</sub> emissions. The sample time and sample volume collected for each test run shall be sufficient to collect enough mass to weigh accurately. The Method 201A and 202 test required in this section may be replaced by a Method 5 in Appendix A of 40 CFR Part 60 and Method 202 in Appendix M of 40 CFR Part 51 test. All particulate captured in the Method 5 and Method 202 test performed under this provision shall be considered PM <sub>2.5</sub> for determination of compliance.
		SO <sub>2</sub>	Method 6C in Appendix A of 40 CFR Part 60 shall be used to determine the sulfur dioxide concentration. Each test will be run for a minimum of one hour.
		NO <sub>x</sub>	Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
		CO	Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
		VOC	Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section IV. Specific Construction Requirements (continued)**

- A. Initial Opacity Compliance Demonstration and Initial Performance Tests (NAC 445B.22017, NAC 445B.252, NAC 445B.346(2))  
(*Federally Enforceable SIP Requirement*) (continued)
2. All initial opacity compliance demonstrations and initial performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of **Section I.H. Testing and Sampling** (NAC 445B.252) of this operating permit. Material sampling must be conducted in accordance with protocols approved by the Director. All initial performance test results shall be based on the arithmetic average of three valid runs. (NAC 445B.252(5))
  3. Testing shall be conducted on the exhaust stack (post controls).
  4. Initial opacity compliance demonstrations and initial performance tests, as specified in Table IV-1 and Table IV-2 above, must be conducted under such conditions as the Director specifies to the operator of the plant based on representative performance of the affected facility. The Permittee shall make available to the Director such records as may be necessary to determine the conditions of the initial opacity compliance demonstrations and initial performance tests. Operations during periods of startup, shutdown and malfunction must not constitute representative conditions of the initial opacity compliance demonstrations and initial performance tests unless otherwise specified in the applicable standard. (NAC 445B.252(3))
  5. The Permittee shall give notice to the Director 30 days before the initial opacity compliance demonstrations and initial performance tests to allow the Director to have an observer present. A written testing procedure must be submitted to the Director at least 30 days before the initial opacity compliance demonstrations and initial performance tests to allow the Director to review the proposed testing procedures. (NAC 445B.252(4) and 40 CFR Part 60.7(a)(6))
  6. Within 60 days after completing the initial opacity compliance demonstrations and initial performance tests contained in Table IV-1 and Table IV-2 of this section, the Permittee shall furnish the Director a written report of the results. All information and analytical results of testing and sampling must be certified as to the truth and accuracy and as to their compliance with NAC 445B.001 to 445B.3689, inclusive. (NAC 445B.252(8))
  7. Initial opacity compliance demonstrations and initial performance tests required under this section that are conducted below the maximum allowable throughput, shall be subject to the Director's review to determine if the throughputs during the initial opacity compliance demonstrations and initial performance tests were sufficient to provide adequate compliance demonstration. Should the Director determine that the initial opacity compliance demonstrations and initial performance tests do not provide adequate compliance demonstration, the Director may require additional testing.

**\*\*\*End of Specific Construction Requirements\*\*\***



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions**

**A. Emission Unit S2.002**

System 1 – Natural Gas Fired Heater #1 (Revised – July 2025, Air Case 11992)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.002	24.3 MMBtu/hr Natural Gas Fired Heater #1	4,381,226	283,499

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.002** has no add-on controls.
  - b. Descriptive Stack Parameters  
 Stack Height: 60.0 feet  
 Stack Diameter: 2.5 feet  
 Stack Temperature: 825 °F  
 Exhaust Flow: 5,050 actual cubic feet per minute (acfm)
  
2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.002** may consume only **natural gas**.
  - b. The maximum allowable fuel consumption rate for **S2.002** shall not exceed **23,824.0 standard cubic feet (scf)** per any one-hour period.
  - c. Hours  
 (1) **S2.002** may operate a total of **24** hours per day.
  
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.002** the following pollutants in excess of the following specified limits:
  - a. The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **0.18** pounds per hour, nor more than **0.79** tons per year.
  - b. The discharge of **PM<sub>10</sub>** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **0.18** pounds per hour, nor more than **0.79** tons per year.
  - c. The discharge of **PM<sub>2.5</sub>** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **0.18** pounds per hour, nor more than **0.79** tons per year.
  - d. The discharge of **SO<sub>2</sub>** (sulfur dioxide) to the atmosphere shall not exceed **0.014** pounds per hour, nor more than **0.063** tons per year.
  - e. The discharge of **NO<sub>x</sub>** (oxides of nitrogen) to the atmosphere shall not exceed **2.21** pounds per hour, nor more than **9.69** tons per year.
  - f. The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **1.44** pounds per hour, nor more than **6.29** tons per year.
  - g. The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.13** pounds per hour, nor more than **0.57** tons per year.
  - h. The opacity from **S2.002** shall not equal or exceed **20** percent.
  
4. Monitoring and Recordkeeping (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.
  - a. Monitor and record the hours of operation for **S2.002** on a daily basis.
  - b. Monitor and record the consumption rate of **natural gas** on a daily basis for **S2.002** (in **scf**) by multiplying the maximum hourly fuel consumption rate as stated in **A.2.b** of this section and the total daily hours of operation.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**A. Emission Unit S2.002 (continued)**

5. Performance and Compliance Testing (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
The Permittee, upon issuance of this operating permit, shall conduct renewal performance testing at least 90 days prior to the expiration of this operating permit, but no earlier than 365 days from the date of expiration of this operating permit, and every 5 years thereafter, in accordance with the following:
  - a. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on the arithmetic average of three valid runs (NAC 445B.252(5)).
  - b. Testing shall be conducted on the exhaust stack (post controls).
  - c. Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
  - d. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
  - e. Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**B. Emission Unit S2.004**

<b>System 2 – Water Cooling Tower #2 (Revised – July 2025, Air Case 11992)</b>		<b>Location UTM (Zone 11, NAD 83)</b>	
		m North	m East
S2.004	Water Cooling Tower #2	4,381,251	283,528

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. Emissions from **S2.004** shall be controlled by drift eliminators to reduce the cooling tower drift losses to the manufacturer’s specification of **0.005%** or less.
  - b. Descriptive Stack Parameters  
 Stack Height: 31.2 feet  
 Stack Diameter: 9.0 feet  
 Stack Temperature: ambient
  
2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. The maximum circulating water flow rate for **S2.004** will not exceed **2,000** gallons per minute.
  - b. The maximum Total Dissolved Solids (TDS) content for **S2.004** will not exceed **2,000** milligrams per liter (ppm).
  - c. The use of chromium-based water treatment chemicals is prohibited.
  - d. Hours  
 (1) **S2.004** may operate a total of **24** hours per day.
  
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.004** the following pollutants in excess of the following specified limits:
  - a. The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **0.10** pounds per hour, nor more than **0.44** tons per year.
  - b. The discharge of **PM<sub>10</sub>** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **0.10** pounds per hour, nor more than **0.44** tons per year.
  - c. The discharge of **PM<sub>2.5</sub>** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **0.10** pounds per hour, nor more than **0.44** tons per year.
  - d. The opacity from **S2.004** shall not equal or exceed **20** percent.
  
4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.
  - a. Monitor and record the cooling water circulation rate (in gallons per minute) for **S2.004** on a daily basis.
  - b. Monitor and record the hours of operation for **S2.004** on a daily basis.
  - c. The Permittee shall sample the cooling tower circulating feed water from **S2.004** and determine the total dissolved solids (TDS, reported in mg per liter, or ppm by weight), on a quarterly basis. The TDS concentration will be determined using Standard Method 2540 C-2011 or ASTM Method D5907-13, or alternative methods approved in advance by the Director.



Bureau of Air Pollution Control

Facility ID No. A1107

Draft Permit No. AP2869-3847.01

CLASS II AIR QUALITY OPERATING PERMIT

Issued to: NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

Section V. Specific Operating Conditions (continued)

C. Emission Unit S2.005

System 3 – Hydrogen Reformer (Revised – July 2025, Air Case 11992)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.005	Hydrogen Reformer (includes 3 burners, each rated at 35.25 MMBtu/hr)	4,381,235	283,590

1. Air Pollution Control Equipment (NAC 445B.346(1)) (Federally Enforceable SIP Requirement)
  - a. **S2.005** has no add-on controls.
  - b. Descriptive Stack Parameters  
 Stack Height: 60.1 feet  
 Stack Diameter: 2.5 feet  
 Stack Temperature: 379 °F  
 Exhaust Flow: 17,116 actual cubic feet per minute (acfm)
  
2. Operating Parameters (NAC 445B.346(1)) (Federally Enforceable SIP Requirement)
  - a. **S2.005** may consume only **natural gas** during normal operations.
  - b. **S2.005** may consume **off-gases** during start-up, shutdown, malfunction (SSM) events.
  - c. The maximum allowable natural gas fuel consumption rate for **S2.005** shall not exceed **103,677.0 standard cubic feet (scf)** per any one-hour period.
  - d. Hours
    - (1) **S2.005** may operate a total of **24** hours per day when using **natural gas** during normal operations.
    - (2) **S2.005** may operate a total of **31** hours per year when combusting **off-gases** during start-up, shutdown, malfunction (SSM) events.
  
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (Federally Enforceable SIP Requirement)
  - a. The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.005 during normal operations** the following pollutants in excess of the following specified limits:
    - (1) The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **0.53** pounds per hour, nor more than **2.32** tons per year.
    - (2) The discharge of **PM<sub>10</sub>** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **0.53** pounds per hour, nor more than **2.32** tons per year.
    - (3) The discharge of **PM<sub>2.5</sub>** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **0.53** pounds per hour, nor more than **2.32** tons per year.
    - (4) The discharge of **SO<sub>2</sub>** (sulfur dioxide) to the atmosphere shall not exceed **0.062** pounds per hour, nor more than **0.27** tons per year.
    - (5) The discharge of **NO<sub>x</sub>** (oxides of nitrogen) to the atmosphere shall not exceed **3.70** pounds per hour, nor more than **16.2** tons per year.
    - (6) The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **0.63** pounds per hour, nor more than **2.78** tons per year.
    - (7) The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.46** pounds per hour, nor more than **2.00** tons per year.
    - (8) The opacity from **S2.005** shall not equal or exceed **20** percent.
  - b. The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.005 during SSM events** the following pollutants in excess of the following specified limits:
    - (1) The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **666.0** pounds per hour, nor more than **10.3** tons per year.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**C. Emission Unit S2.005 (continued)**

4. Monitoring and Recordkeeping (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

- a. Monitor and record the hours of operation for **S2.005** during normal operations and SSM events on a daily basis.
- b. Monitor and record the consumption rate of **natural gas** on a daily basis for **S2.005** (in scf) by multiplying the maximum hourly fuel consumption rate as stated in **C.2.c** of this section and the total daily hours of operation.
- c. Record the monthly hours of operation, and the corresponding annual hours of operation **during SSM events** for the year. The monthly hours of operation **during SSM events** shall be determined at the end of each month as the sum of daily hours of operation **during SSM events** for each day of the month. The annual hours of operation **during SSM events** shall be determined as the sum of the monthly hours of operation **during SSM events** for the year.

5. Performance and Compliance Testing (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)

The Permittee, upon issuance of this operating permit, shall conduct renewal performance testing for **S2.005, during normal operations**, at least 90 days prior to the expiration of this operating permit, but no earlier than 365 days from the date of expiration of this operating permit, and every 5 years thereafter, in accordance with the following:

- a. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on the arithmetic average of three valid runs (NAC 445B.252(5)).
- b. Testing shall be conducted on the exhaust stack (post controls).
- c. Method 5 in Appendix A of 40 CFR Part 60 shall be used to determine PM emissions. The sample volume for each test run shall be at least 1.7 dscm (60 dscf). Test runs must be conducted for up to two hours in an effort to collect this minimum sample.
- d. Method 201A and Method 202 in Appendix M of 40 CFR Part 51 shall be used to determine PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The sample time and sample volume collected for each test run shall be sufficient to collect enough mass to weigh accurately.
- e. The Method 201A and 202 test required in this section may be replaced by a Method 5 in Appendix A of 40 CFR Part 60 and Method 202 in Appendix M of 40 CFR Part 51 test. All particulate captured in the Method 5 and Method 202 test performed under this provision shall be considered PM<sub>2.5</sub> for determination of compliance.
- f. Method 6C in Appendix A of 40 CFR Part 60 shall be used to determine the sulfur dioxide concentration. Each test will be run for a minimum of one hour. Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
- g. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
- h. Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
- i. Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**D1. Emission Unit S2.006**

<b>System 4A – Standby Diesel Generator (Revised – July 2025, Air Case 11992)</b>		<b>Location UTM (Zone 11, NAD 83)</b>	
		m North	m East
<b>S2.006</b>	Standby Diesel Generator #1 (2882 HP, mfd November 2006)	4,381,258	283,566

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.006** has no add-on controls.
  - b. Descriptive Stack Parameters  
 Stack Height: 14.0 feet  
 Stack Diameter: 0.83 feet  
 Stack Temperature: 867 °F
  
2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.006** may consume only **diesel**.
  - b. The maximum allowable fuel consumption rate for **S2.006** shall not exceed **144.1 gallons** per any one-hour period.
  - c. Hours
    - (1) **S2.006** may operate a total of **24** hours per day.
    - (2) **S2.006** may operate a total of **100** hours per year of non-emergency use. There is no time limit on operation in emergency situations.
  
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.006** the following pollutants in excess of the following specified limits:
  - a. The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **2.56** pounds per hour, nor more than **0.13** tons per year.
  - b. The discharge of **PM<sub>10</sub>** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **2.56** pounds per hour, nor more than **0.13** tons per year.
  - c. The discharge of **PM<sub>2.5</sub>** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **2.56** pounds per hour, nor more than **0.13** tons per year.
  - d. The discharge of **SO<sub>2</sub>** (sulfur dioxide) to the atmosphere shall not exceed **0.035** pounds per hour, nor more than **0.0017** tons per year.
  - e. The discharge of **NO<sub>x</sub>** (oxides of nitrogen) to the atmosphere shall not exceed **43.6** pounds per hour, nor more than **2.18** tons per year.
  - f. The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **54.0** pounds per hour, nor more than **2.70** tons per year.
  - g. The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **6.16** pounds per hour, nor more than **0.31** tons per year.
  - h. The opacity from **S2.006** shall not equal or exceed **20** percent.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**D1. Emission Unit S2.006 (continued)**

4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)  
The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.
  - a. Monitor and record the total daily hours of operation for **S2.006** for each day of operation. The Permittee shall note which hours of operation are emergency hours, and which hours of operation are hours for non-emergency use.
  - b. Monitor and record the consumption rate of **diesel** on a daily basis for **S2.006** (in **gallons**) by multiplying the maximum hourly fuel consumption rate as stated in **D1.2.b** of this section and the total daily hours of operation.
  - c. Monitor and record the total yearly hours of operation of **S2.006** per year. The annual hours of operation shall be determined at the end of each month as the sum of the monthly hours of operation for all previous months of that year.
  - d. The Permittee, upon issuance of this operating permit, shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative (40 CFR 60.7(b)).
  
5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
  - a. Emissions Standards (40 CFR 60.4205)  
The Permittee must comply with the emission standards for new non-road CI (compression ignition) ICE (internal combustion engine) in Table 1 for all pollutants, for the same model year and maximum engine power of **S2.006** for their pre- 2007 model year emergency stationary CI ICE with a displacement of less than 10 liters per cylinder. (40 CFR 60.4205(a), Table 1)
    - (1) For a pre-2007 model year emergency stationary CI ICE with a displacement of less than 10 liters per cylinder with a rated power greater than 560 kW: (40 CFR 60.4205(a), Table 1)
      - (a) The discharge of PM to the atmosphere shall not exceed **0.54** grams/kW-hr (**2.56** pounds per hour).
      - (b) The discharge of CO to the atmosphere shall not exceed **11.4** grams/kW-hr (**54.03** pounds per hour).
      - (c) The discharge of NMHC (non-methane hydrocarbon) to the atmosphere shall not exceed **1.3** grams/kW-hr (**6.16** pounds per hour).
      - (d) The discharge of NO<sub>x</sub> to the atmosphere shall not exceed **9.2** grams/kW-hr (**43.6** pounds per hour).
  - b. Fuel Requirements (40 CFR 60.4207)  
The Permittee must meet the following diesel requirements for non-road engines: (40 CFR 60.4207(b), 40 CFR 1090.305)
    - (1) Sulfur content to be 15 parts per million (ppm) maximum.
    - (2) A minimum cetane index of 40; or
    - (3) A maximum aromatic content of 35 volume percent.
  - c. Monitoring Requirements (40 CFR 60.4209)  
The Permittee must install a non-resettable hour meter if the CI ICE does not meet the standards applicable to non-emergency engines. (40 CFR 60.4209(a))
  - d. Compliance Requirements (40 CFR 60.4206, 60.4211)
    - (1) The Permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4205 over the entire life of the engine. (40 CFR 60.4206)
    - (2) The Permittee must operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; change only those emission-related settings that are permitted by the manufacturer; and meet the requirements of 40 CFR Part 1039. (40 CFR 60.4211(a))



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**D1. Emission Unit S2.006 (continued)**

5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (continued)
  - d. Compliance Requirements (40 CFR 60.4206, 60.4211) (continued)
    - (3) The Permittee must demonstrate compliance according to one of the following methods: (40 CFR 60.4211(b))
      - (a) Purchasing an engine certified according to 40 CFR Part 1039 for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications. (40 CFR 60.4211(b)(1))
      - (b) Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in subpart IIII and these methods must have been followed correctly. (40 CFR 60.4211(b)(2))
      - (c) Keeping records of engine manufacturer data indicating compliance with the standards. (40 CFR 60.4211(b)(3))
      - (d) Keeping records of control device vendor data indicating compliance with the standards. (40 CFR 60.4211(b)(4))
      - (e) Conducting an initial performance test to demonstrate compliance with the emission standards according to the requirements specified in 40 CFR 60.4212, as applicable. (40 CFR 60.4211(b)(5))
    - (4) In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs **D1.5.d.(4)(a) through (c)** of this section, is prohibited. If the Permittee do not operate the engine according to the requirements in paragraphs **D1.5.d.(4)(a) through (c)** of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. (40 CFR 60.4211(f))
      - (a) There is no time limit on the use of emergency stationary ICE in emergency situations. (40 CFR 60.4211(f)(1))
      - (b) The Permittee may operate the Permittee's emergency stationary ICE for any combination of the purposes specified in paragraphs **D1.5.d.(4)(b)** of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph **D1.5.d.(4)(c)** of this section counts as part of the 100 hours per calendar year. (40 CFR 60.4211(f)(2))
        - i. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. (40 CFR 60.4211(f)(2)(i))
      - (c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph **D1.5.d.(4)(b)** of this section. Except as provided in paragraph **D1.5.d.(4)(c)** of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (40 CFR 60.4211(f)(3))
        - i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the conditions in 40 CFR 60.4211(f)(3)(i)(A) through (E) are met. (40 CFR 60.4211(f)(3)(i))



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**D1. Emission Unit S2.006 (continued)**

5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (continued)
  - d. Compliance Requirements (40 CFR 60.4206, 60.4211) (continued)
    - (5) If the Permittee does not install, configure, operate, and maintain the Permittee's engine and control device according to the manufacturer's emission-related written instructions, or the Permittee change emission-related settings in a way that is not permitted by the manufacturer, the Permittee must demonstrate compliance as follows: (40 CFR 60.4211(g))
      - (a) For CI ICE greater than 500 hp, the Permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the Permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after the Permittee change emission-related settings in a way that is not permitted by the manufacturer. The Permittee must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards. (40 CFR 60.4211(g)(3))
  - e. National Emission Standards for Hazardous Air Pollutants for Source Categories – 40 CFR Part 63, Subpart ZZZZ – Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines:  
If the compression ignition engine meets the requirements of 40 CFR Part 60 Subpart IIII, 40 CFR Part 63 Subpart ZZZZ requirements are also met. (40 CFR Part 63.6590(c))



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**D2. Emission Unit S2.020**

System 4B – Standby Diesel Generator (Revised – July 2025, Air Case 11992)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.020	Standby Diesel Generator #2 (2935 HP, mfd by Detroit, mfd 2002)	4,381,282	283,445

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.020** has no add-on controls.
  - b. Descriptive Stack Parameters  
 Stack Height: 14.0 feet  
 Stack Diameter: 1.33 feet  
 Stack Temperature: 871 °F
  
2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.020** may consume only **diesel**.
  - b. The maximum allowable fuel consumption rate for **S2.020** shall not exceed **139.5 gallons** per any one-hour period.
  - c. Hours
    - (1) **S2.020** may operate a total of **24** hours per day.
    - (2) **S2.020** may operate a maximum of **100** hours per year of non-emergency use. There is no time limit on operation in emergency situations.
  
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.020** the following pollutants in excess of the following specified limits:
  - a. The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **1.10** pounds per hour, nor more than **0.055** tons per year.
  - b. The discharge of **PM<sub>10</sub>** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **1.10** pounds per hour, nor more than **0.055** tons per year.
  - c. The discharge of **PM<sub>2.5</sub>** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **1.10** pounds per hour, nor more than **0.055** tons per year.
  - d. The discharge of **SO<sub>2</sub>** (sulfur dioxide) to the atmosphere shall not exceed **0.030** pounds per hour, nor more than **0.0015** tons per year.
  - e. The discharge of **NO<sub>x</sub>** (oxides of nitrogen) to the atmosphere shall not exceed **28.3** pounds per hour, nor more than **1.42** tons per year.
  - f. The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **4.98** pounds per hour, nor more than **0.25** tons per year.
  - g. The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **5.24** pounds per hour, nor more than **0.26** tons per year.
  - h. The opacity from **S2.020** shall not equal or exceed **20 percent**.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**D2. Emission Unit S2.020 (continued)**

4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)  
The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.
  - a. Monitor and record the total daily hours of operation for **S2.020** for each day of operation. The Permittee shall note which hours of operation are emergency hours, and which hours of operation are hours for non-emergency use.
  - b. Monitor and record the consumption rate of **diesel** on a daily basis for **S2.020** (in **gallons**) by multiplying the maximum hourly fuel consumption rate as stated in **D2.2.b** of this section and the total daily hours of operation.
  - c. Monitor and record the total yearly hours of operation of **S2.020** per year. The annual hours of operation shall be determined at the end of each month as the sum of the monthly hours of operation for all previous months of that year.
  
5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
National Emissions Standards for Hazardous Air Pollutants (NESHAP) – 40 CFR Part 63 Subpart ZZZZ – for Stationary Reciprocating Internal Combustion Engines
  - a. Emissions Limitations, Management Practices and Other Requirements (40 CFR 63.6603(a), Table 2d)  
For each Emergency stationary CI RICE and black start stationary CI RICE, the Permittee must meet the following requirement, except during periods of startup:
    - (1) Change oil and filter every 500 hours of operation or annually, whichever comes first;
    - (2) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
    - (3) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
  - b. Fuel Requirements (40 CFR 63.6604)  
The Permittee must meet the following diesel requirements for non-road engine: (40 CFR 63.6604, 40 CFR 1090.305)
    - (1) Sulfur content to be 15 parts per million (ppm) maximum.
    - (2) Cetane index or aromatic content as follows:
      - (a) A minimum cetane index of 40; or
      - (b) A maximum aromatic content of 35 volume percent.
  - c. Monitoring, Installation, Collection, Operation, Maintenance Requirements (40 CFR 63.6625)
    - (1) The Permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop the Permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. (40 CFR 63.6625(e))
    - (2) The Permittee must install a non-resettable hour meter if one is not already installed. (40 CFR 63.6625(f))
    - (3) The Permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in in **D2.5.a** of this section. (40 CFR 63.6625(h))



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**D2. Emission Unit S2.020 (continued)**

5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
National Emissions Standards for Hazardous Air Pollutants (NESHAP) – 40 CFR Part 63 Subpart ZZZZ – for Stationary Reciprocating Internal Combustion Engines (continued)
  - c. Monitoring, Installation, Collection, Operation, Maintenance Requirements (40 CFR 63.6625) (continued)
    - (4) The Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in **D2.5.a.(1)** of this section. The oil analysis must be performed at the same frequency specified for changing the oil in **D2.5.a.(1)** of this section. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the Permittee is not required to change the oil. If any of the limits are exceeded, the Permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The Permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. (40 CFR 63.6625(i))
  - d. Compliance Requirements (40 CFR 63.6605, 63.6640, Table 6)
    - (1) The Permittee must be in compliance with the emission limitations, operating limitations, and other requirements in Subpart ZZZZ that apply at all times. (40 CFR Part 63.6605(a))
    - (2) The Permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. (40 CFR Part 63.6605(b))
    - (3) Permittee must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in **D2.5.a** of this section that applies to the Permittee according to methods specified below: (40 CFR 63.6640(a), Table 6)
      - (a) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
      - (b) Develop and follow Permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**D2. Emission Unit S2.020 (continued)**

5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
National Emissions Standards for Hazardous Air Pollutants (NESHAP) – 40 CFR Part 63 Subpart ZZZZ – for Stationary Reciprocating Internal Combustion Engines (continued)
  - d. Compliance Requirements (40 CFR 63.6605, 63.6640, Table 6) (continued)
    - (4) The Permittee must operate the emergency stationary RICE according to the requirements in **D2.5.d.(4)(a) through (c)** of this section. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in **D2.5.d.(4)(a) through (c)** of this section, is prohibited. If the Permittee does not operate the engine according to the requirements in **D2.5.d.(4)(a) through (c)** of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. (40 CFR 63.6640(f))
      - (a) There is no time limit on the use of emergency stationary RICE in emergency situations. (40 CFR 63.6640(f)(1))
      - (b) The Permittee may operate their emergency stationary RICE for any combination of the purposes specified in **D2.5.d.(4)(b)(i)** of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by **D2.5.d.(c)** of this section counts as part of the 100 hours per calendar year. (40 CFR 63.6640(f)(2))
        - i. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The Permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. (40 CFR 63.6640(f)(2)(i))
      - (c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in **D2.5.d.(4)(b)** of this section. Except as provided in **D2.5.d.(4)(c)(i) and (ii)** of this section, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (40 CFR 63.6640(f)(4))
        - i. Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system. (40 CFR 63.6640(f)(4)(i))
        - ii. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the conditions in 40 CFR 63.6640(f)(4)(ii)(A) through (E) are met. (40 CFR 63.6640(f)(4)(ii))



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**D2. Emission Unit S2.020 (continued)**

5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
National Emissions Standards for Hazardous Air Pollutants (NESHAP) – 40 CFR Part 63 Subpart ZZZZ – for Stationary Reciprocating Internal Combustion Engines (continued)

e. Recordkeeping Requirements (40 CFR Part 63.6655)

The Permittee must keep the following records:

- (1) A copy of each notification and report that the Permittee submitted to comply with Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that the Permittee submitted, according to the requirement in 40 CFR Part 63.10(b)(2)(xiv). (40 CFR 63.6655(a)(1))
- (2) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. (40 CFR 63.6655(a)(2))
- (3) Records of performance tests and performance evaluations as required in 40 CFR Part 63.10(b)(2)(viii). (40 CFR 63.6655(a)(3))
- (4) Records of all required maintenance performed on the RICE and any air pollution control and monitoring equipment. (40 CFR 63.6655(a)(4))
- (5) Records of actions taken during periods of malfunction to minimize emissions in accordance with **D2.5.d.(2)** of this section including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. (40 CFR 63.6655(a)(5))
- (6) The Permittee must keep the records required in with **D2.5.d.(3)** of this section to show continuous compliance with each emission or operating limitation that applies. (40 CFR 63.6655(d))
- (7) The Permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the Permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to their own maintenance plan. (40 CFR 63.6655(e))
- (8) The Permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in 40 CFR Part 63.6640(f)(2)(ii) or (iii), or 40 CFR Part 63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. (40 CFR 63.6655(f))



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**E1. Emission Unit S2.007**

System 5 – Enclosed Ground Oxidizer – Normal Operations (Revised – July 2025, Air Case 11992)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.007	Enclosed Ground Oxidizer (combusts up to 12.29 MMBtu/hr Off-Gases)	4,381,298	283,430

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.007** has no add-on controls. **S2.007** shall be used to combust off-gases produced by the production processes (Hydrogen Reformer and other processes).
  - b. Descriptive Stack Parameters  
 Stack Height: 50.0 feet  
 Stack Diameter: 12.0 feet  
 Stack Temperature: 1,200 °F  
 Exhaust Flow: 312,149 actual cubic feet per minute (acfm)
  
2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.007** may consume only **off-gases from the production processes**.
  - b. The maximum allowable **off-gases** consumption rate for **S2.007** shall not exceed **55,070 standard cubic feet (scf) per any one-hour period**.
  - c. Hours
    - (1) **S2.007** may operate a total of **24** hours per day.
    - (2) **S2.007** may operate a total of **4,763.8** hours per year when combusting **off-gases** from the production processes.
  
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from the exhaust stack of **S2.007** when **off-gases from the production processes** are being combusted the following pollutants in excess of the following specified limits:
  - (a) The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **0.14** pounds per hour, nor more than **0.33** tons per year.
  - (b) The discharge of **PM<sub>10</sub>** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **0.14** pounds per hour, nor more than **0.33** tons per year.
  - (c) The discharge of **PM<sub>2.5</sub>** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **0.14** pounds per hour, nor more than **0.33** tons per year.
  - (d) The discharge of **SO<sub>2</sub>** (sulfur dioxide) to the atmosphere shall not exceed **0.00** pounds per hour, nor more than **0.00** tons per year. **Sulfur** is not anticipated to be present in the off-gas feed stream.
  - (e) The discharge of **NO<sub>x</sub>** (oxides of nitrogen) to the atmosphere shall not exceed **1.84** pounds per hour, nor more than **4.39** tons per year.
  - (f) The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **3.81** pounds per hour, nor more than **9.07** tons per year.
  - (g) The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.048** pounds per hour, nor more than **0.11** tons per year.
  - (h) The opacity from **S2.007** when off-gases are being combusted shall not equal or exceed **20** percent.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**E1. Emission Unit S2.007 (continued)**

4. Monitoring and Recordkeeping (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

- a. Monitor and record the hours of operation for **S2.007** on a daily basis.
- b. Monitor and record the consumption rate of **off-gases from the production processes** on a daily basis for **S2.007** (in **scf**) by multiplying the maximum hourly fuel consumption rate as stated in **E1.2.b** of this section and the total daily hours of operation.
- c. Record the total hours of operation of **S2.007** per year for the consumption of **off-gases from the production processes**. The annual hours of operation shall be determined at the end of each month as the sum of the monthly hours of operation for all previous months of that year.
- d. Record the total consumption (in scf) for **S2.007** per year for **off-gases from the production processes**. The annual consumption shall be determined at the end of each month as the sum of the monthly consumption for all previous months of that year.
- e. Monitor and record the heat content (in btu/scf) of the **off-gases from the production processes on a quarterly basis**.
- f. Conduct and record an observation of visible emissions (excluding water vapor) on **S2.007** on a **monthly** basis while operating. The observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented to their back. If visible emissions are observed and exceed the applicable opacity standard, the Permittee shall take immediate corrective action. The Permittee shall maintain in a contemporaneous log with the following recordkeeping: the calendar date and time of any required monitoring, name of the observer, results of the monthly observation of visible emissions, and any corrective actions taken.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**E1. Emission Unit S2.007 (continued)**

5. Performance and Compliance Testing (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
The Permittee, upon issuance of this operating permit, shall conduct renewal performance testing on the exhaust stack of **S2.007, when off-gases from the production processes are being combusted**, at least 90 days prior to the expiration of this operating permit, but no earlier than 365 days from the date of expiration of this operating permit, and every 5 years thereafter, in accordance with the following:
  - a. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on the arithmetic average of three valid runs (NAC 445B.252(5)).
  - b. Testing shall be conducted on the exhaust stack (post controls).
  - c. Method 5 in Appendix A of 40 CFR Part 60 shall be used to determine PM emissions. The sample volume for each test run shall be at least 1.7 dscm (60 dscf). Test runs must be conducted for up to two hours in an effort to collect this minimum sample.
  - d. Method 201A and Method 202 in Appendix M of 40 CFR Part 51 shall be used to determine PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The sample time and sample volume collected for each test run shall be sufficient to collect enough mass to weigh accurately.
  - e. The Method 201A and 202 test required in this section may be replaced by a Method 5 in Appendix A of 40 CFR Part 60 and Method 202 in Appendix M of 40 CFR Part 51 test. All particulate captured in the Method 5 and Method 202 test performed under this provision shall be considered PM<sub>2.5</sub> for determination of compliance.
  - f. Method 6C in Appendix A of 40 CFR Part 60 shall be used to determine the sulfur dioxide concentration. Each test will be run for a minimum of one hour.
  - g. Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
  - h. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
  - i. Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
  - j. Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**E2. Emission Unit S2.007alt**

System 5 – Enclosed Ground Oxidizer – Alternate Operating Scenario (Revised – July 2025, Air Case 11992)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.007alt	Enclosed Ground Oxidizer (combusts up to 12.29 MMBtu/hr Off-Gases and up to 79.7 MMBtu/hr Isom Stripper Gas)	4,381,298	283,430

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.007alt** has no add-on controls. **S2.007alt** shall be used to combust off-gases produced by the production processes (Hydrogen Reformer and other processes) and also combust process gases from the isomerization stripper (Isom Stripper gases).
  - b. Descriptive Stack Parameters  
 Stack Height: 50.0 feet  
 Stack Diameter: 12.0 feet  
 Stack Temperature: 1,200 °F  
 Exhaust Flow: 312,149 actual cubic feet per minute (acfm)
  
2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.007alt** may consume only **off-gases from the production processes** and **Isom Stripper gases from the isomerization stripper**.
  - b. The maximum allowable **off-gases** consumption rate for **S2.007alt** shall not exceed **55,070 standard cubic feet (scf) per any one-hour period**.
  - c. The maximum allowable **Isom Stripper gases** consumption rate for **S2.007alt** shall not exceed **58,757.0 standard cubic feet (scf)** per any one-hour period.
  - d. Hours
    - (1) **S2.007alt** may operate a total of **24** hours per day.
    - (2) **S2.007alt** may operate a total of **3,996.2** hours per year when combusting **off-gases from the production processes and Isom Stripper gases from the isomerization stripper**.
  
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from the exhaust stack of **S2.007alt** when **off-gases from the production processes** and **Isom Stripper gases from the isomerization stripper** are being combusted the following pollutants in excess of the following specified limits:
  - (a) The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **0.15** pounds per hour, nor more than **0.29** tons per year.
  - (b) The discharge of **PM<sub>10</sub>** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **0.15** pounds per hour, nor more than **0.29** tons per year.
  - (c) The discharge of **PM<sub>2.5</sub>** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **0.15** pounds per hour, nor more than **0.29** tons per year.
  - (d) The discharge of **SO<sub>2</sub>** (sulfur dioxide) to the atmosphere shall not exceed **0.00** pounds per hour, nor more than **0.00** tons per year. **Sulfur** is not anticipated to be present in the Isom Stripper gas feed stream.
  - (e) The discharge of **NO<sub>x</sub>** (oxides of nitrogen) to the atmosphere shall not exceed **12.69** pounds per hour, nor more than **25.4** tons per year.
  - (f) The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **25.31** pounds per hour, nor more than **50.6** tons per year.
  - (g) The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.11** pounds per hour, nor more than **0.22** tons per year.
  - (h) The opacity from **S2.007** when Isom stripper gases are being combusted shall not equal or exceed **20** percent.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**E2. Emission Unit S2.007alt (continued)**

4. Monitoring and Recordkeeping (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

- a. Monitor and record the hours of operation for **S2.007alt** on a daily basis.
- b. Monitor and record the consumption rate of **off-gasses from the production processes** on a daily basis for **S2.007alt** (in scf) by multiplying the maximum hourly fuel consumption rate as stated in **E2.2.b** of this section and the total daily hours of operation.
- c. Monitor and record the consumption rate of **Isom Stripper Gas from the Isomerization Stripper** on a daily basis for **S2.007** (in scf) by multiplying the maximum hourly fuel consumption rate as stated in **E2.2.c** of this section and the total daily hours of operation.
- d. Record the total hours of operation of **S2.007alt** per year for the consumption of **off-gases from the production processes** and the consumption of the **Isom Stripper gases from the Isomerization Stripper**. The annual hours of operation shall be determined at the end of each month as the sum of the monthly hours of operation for all previous months of that year.
- e. Record the total consumption (in scf) for **S2.007alt** per year for **off-gases from the production processes** and **Isom Stripper gases from the Isomerization Stripper**. The annual consumption shall be determined at the end of each month as the sum of the monthly consumption for all previous months of that year.
- f. Monitor and record the heat content (in btu/scf) of the **off-gases from the production processes** and **Isom Stripper gases from the Isomerization Stripper on a quarterly basis**.
- g. Conduct and record an observation of visible emissions (excluding water vapor) on **S2.007alt** on a **monthly** basis while operating. The observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented to their back. If visible emissions are observed and exceed the applicable opacity standard, the Permittee shall take immediate corrective action. The Permittee shall maintain in a contemporaneous log with the following recordkeeping: the calendar date and time of any required monitoring, name of the observer, results of the monthly observation of visible emissions, and any corrective actions taken.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**E2. Emission Unit S2.007alt (continued)**

5. Performance and Compliance Testing (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
The Permittee, upon issuance of this operating permit, shall conduct renewal performance testing on the exhaust stack of **S2.007alt, when off-gases from the production processes and the Isom Stripper gases from the Isomerization Stripper are being combusted**, at least 90 days prior to the expiration of this operating permit, but no earlier than 365 days from the date of expiration of this operating permit, and every 5 years thereafter, in accordance with the following:
  - a. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on the arithmetic average of three valid runs (NAC 445B.252(5)).
  - b. Testing shall be conducted on the exhaust stack (post controls).
  - c. Method 5 in Appendix A of 40 CFR Part 60 shall be used to determine PM emissions. The sample volume for each test run shall be at least 1.7 dscm (60 dscf). Test runs must be conducted for up to two hours in an effort to collect this minimum sample.
  - d. Method 201A and Method 202 in Appendix M of 40 CFR Part 51 shall be used to determine PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The sample time and sample volume collected for each test run shall be sufficient to collect enough mass to weigh accurately.
  - e. The Method 201A and 202 test required in this section may be replaced by a Method 5 in Appendix A of 40 CFR Part 60 and Method 202 in Appendix M of 40 CFR Part 51 test. All particulate captured in the Method 5 and Method 202 test performed under this provision shall be considered PM<sub>2.5</sub> for determination of compliance.
  - f. Method 6C in Appendix A of 40 CFR Part 60 shall be used to determine the sulfur dioxide concentration. Each test will be run for a minimum of one hour.
  - g. Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
  - h. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
  - i. Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
  - j. Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034**

System 06 – SAF (Sustainable Aviation Fuel) and Naphtha Storage Tanks (Revised – July 2025, Air Case # 11992)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.008	<del>500,000 Gallon Corn Oil Tank</del> (reclassified as IA1.009)	4,381,296	283,526
S2.012	<del>1,000,000 Gallon Corn Oil Tank</del> (reclassified as IA1.010)	4,381,294	283,472
S2.009	220,000 Gallon SAF Guard Tank #1	4,381,293	283,594
S2.010	220,000 Gallon SAF Guard Tank #2	4,381,289	283,613
S2.013	220,000 Gallon SAF Guard Tank #4	4,381,294	283,578
S2.014	220,000 Gallon SAF Guard Tank #3	4,381,294	283,562
S2.015	300,000 Gallon SAF Guard Tank	4,381,289	283,489
S2.033	25,000 Gallon SAF Tank #1 (previously IA1.003)	4,381,303	283,497
S2.034	25,000 Gallon SAF Tank #2 (previously IA1.004)	4,381,303	283,508
S2.031	25,000 Gallon Naphtha Tank #1 (internal floating roof) (previously IA1.001)	4,381,302	283,508
S2.032	25,000 Gallon Naphtha Tank #2 (internal floating roof) (previously IA1.002)	4,381,297	283,508
S2.021	25,000 Gallon Naphtha Tank #3 (internal floating roof) (previously IA1.005)	4,381,294	283,578
S2.022	25,000 Gallon Naphtha Tank BD1 (internal floating roof) (previously IA1.006)	4,381,276	283,479
S2.023	25,000 Gallon Naphtha Tank BD2 (internal floating roof) (previously IA1.007)	4,381,276	283,474
S2.024	25,000 Gallon Naphtha Tank BD3 (internal floating roof) (previously IA1.008)	4,381,276	283,469

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.009, S2.010, S2.013, S2.014, S2.015, S2.033, and S2.034, each**, have no add-on controls.
  - b. **S2.021, S2.022, S2.023, S2.024, S2.031, and S2.032, each**, have an internal floating roof.
  - c. Descriptive Tank Parameters for S2.009, S2.010, S2.013, and S2.014  
 Shell Diameter: 43.3 feet  
 Tank Height: 20.2 feet  
 Capacity: 220,000 gallons  
 True Vapor Pressure of SAF: 0.29 psia (2.0 kPa)
  - d. Descriptive Tank Parameters for S2.015  
 Shell Diameter: 32.0 feet  
 Tank Height: 52.0 feet  
 Capacity: 300,000 gallons  
 True Vapor Pressure of SAF: 0.29 psia (2.0 kPa)
  - e. Descriptive Tank Parameters for S2.021, S2.022, S2.023, S2.024, S2.031, S2.032  
 Shell Diameter: 12.0 feet  
 Tank Height: 30.0 feet  
 Capacity: 25,000 gallons  
 True Vapor Pressure of naphtha: 5.3 psia (36.5 kPa)
  - f. Descriptive Tank Parameters for S2.033 and S2.034  
 Shell Diameter: 12.0 feet  
 Tank Height: 30.0 feet  
 Capacity: 25,000 gallons  
 True Vapor Pressure of SAF: 0.29 psia (2.0 kPa)



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**Facility ID No. A1107**

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**CLASS II AIR QUALITY OPERATING PERMIT**

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**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034 (continued)**

2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)

- a. **S2.009, S2.010, and S2.013, S2.014, and S2.015, S2.033, and S2.034, each**, shall only be used to store **sustainable aviation fuel (SAF)**.
- b. **S2.021, S2.022, S2.023, S2.024, S2.031, and S2.032, each**, shall only be used to store **naphtha**.
- c. The maximum allowable throughput rate for **S2.009, S2.010, S2.013, and S2.014, each**, shall not exceed **10,000,000.0** gallons per year.
- d. The maximum allowable throughput rate for **S2.015** shall not exceed **40,000,000.0** gallons per year.
- e. The maximum allowable throughput rate for **S2.021, S2.022, S2.023, S2.024, S2.031, and S2.032, each**, shall not exceed **1,170,000.0** gallons per year.
- f. The maximum allowable throughput rate for **S2.033 and S2.034, each**, shall not exceed **1,000,000.0** gallons per year.
- g. Hours  
**S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034, each**, may operate a total of **24** hours per day.

3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)

The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere the following pollutants in excess of the following specified limits:

- a. For **S2.009, S2.010, S2.013, and S2.014, each**, the discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.15** tons per year.
- b. For **S2.015**, the discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.27** tons per year.
- c. For **S2.021, S2.022, S2.023, S2.024 S2.031, and S2.032, each**, the discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.80** tons per year.
- d. For **S2.033 and S2.034, each**, the discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.016** tons per year.
- e. The opacity from **S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034, each**, shall not equal or exceed **20** percent.

4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

- a. Monitor and record the throughput of **SAF**, in gallons, loaded into, or dispensed from, **S2.009, S2.010, S2.013, S2.014, and S2.015, S2.033 and S2.034, each**, on a monthly basis, as determined from vendor invoices for tank loading or fuel pump non-resettable meter for tank dispensing.
- b. Monitor and record the throughput of **naphtha**, in gallons, loaded into, or dispensed from, **S2.021, S2.022, S2.023, S2.024, S2.031, and S2.032, each**, on a monthly basis, as determined from vendor invoices for tank loading or fuel pump non-resettable meter for tank dispensing.
- c. Monitor and record the total yearly throughput rate in gallons per year. The annual throughput shall be determined at the end of each month as the sum of the monthly throughput rates for the year for all previous months of that year.



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**Facility ID No. A1107**

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**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034 (continued)**

5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023

The Permittee shall meet the following requirements for **S2.031 and S2.032**:

a. Standards for Volatile Organic Compounds (VOC) (40 CFR 60.112b)

The Permittee shall equip each storage vessel either with a design capacity greater than or equal to 151 m<sup>3</sup> (39,890 gallons) containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa (0.75 psia) but less than 76.6 kPa (11.11 psia) or with a design capacity greater than or equal to 75 m<sup>3</sup> (19,812 gallons) but less than 151 m<sup>3</sup> (39,890 gallons) containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa (4.00 psia) but less than 76.6 kPa (11.11 psia), with one of the specified control equipment options in 40 CFR 60.112b(a).

(1) A fixed roof in combination with an internal floating roof meeting the following specifications:

- (a) The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible.
- (b) Each internal floating roof shall be equipped with one of the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
  - (i) A foam- or liquid-filled seal mounted in contact with the liquid (liquid-mounted seal). A liquid-mounted seal means a foam- or liquid-filled seal mounted in contact with the liquid between the wall of the storage vessel and the floating roof continuously around the circumference of the tank.
  - (ii) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous.
  - (iii) A mechanical shoe seal. A mechanical shoe seal is a metal sheet held vertically against the wall of the storage vessel by springs or weighted levers and is connected by braces to the floating roof. A flexible coated fabric (envelope) spans the annular space between the metal sheet and the floating roof.
- (c) Each opening in a noncontact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to provide a projection below the liquid surface.
- (d) Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers on each access hatch and automatic gauge float well shall be bolted except when they are in use.
- (e) Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports.
- (f) Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting.
- (g) Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening.
- (h) Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

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**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, S2.031, and S2.032 (continued)**

5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023 (continued)

The Permittee shall meet the following requirements for **S2.031 and S2.032**:

b. Testing and Procedures (40 CFR 60.113b)

After installing the control equipment required to meet 40 CFR 60.112b(a)(1) (permanently affixed roof and internal floating roof), each owner or operator shall:

- (1) Visually inspect the internal floating roof, the primary seal, and the secondary seal (if one is in service), prior to filling the storage vessel with VOL. If there are holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric or defects in the internal floating roof, or both, the owner or operator shall repair the items before filling the storage vessel.
- (2) For vessels equipped with a liquid-mounted or mechanical shoe primary seal, visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill. If the internal floating roof is not resting on the surface of the VOL inside the storage vessel, or there is liquid accumulated on the roof, or the seal is detached, or there are holes or tears in the seal fabric, the owner or operator shall repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in this paragraph cannot be repaired within 45 days and if the vessel cannot be emptied within 45 days, a 30-day extension may be requested from the Administrator in the inspection report required in 40 CFR 60.115b(a)(3). Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
- (3) For vessels equipped with a double-seal system as specified in 40 CFR 60.112b(a)(1)(ii)(B):
  - (a) Visually inspect the vessel as specified in 40 CFR 60.113b(a)(4) at least every 5 years; or
  - (b) Visually inspect the vessel as specified in 40 CFR 60.113b(a)(2).
- (4) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes and sleeve seals (if any) each time the storage vessel is emptied and degassed. If the internal floating roof has defects, the primary seal has holes, tears, or other openings in the seal or the seal fabric, or the secondary seal has holes, tears, or other openings in the seal or the seal fabric, or the gaskets no longer close off the liquid surfaces from the atmosphere, or the slotted membrane has more than 10 percent open area, the owner or operator shall repair the items as necessary so that none of the conditions specified in this paragraph exist before refilling the storage vessel with VOL. In no event shall inspections conducted in accordance with this provision occur at intervals greater than 10 years in the case of vessels conducting the annual visual inspection as specified in paragraphs 40 CFR 60.113b(a)(2) and 40 CFR 60.113(a)(3)(ii) and at intervals no greater than 5 years in the case of vessels specified in paragraph 40 CFR 60.113b(a)(3)(i).
- (5) Notify the Administrator in writing at least 30 days prior to the filling or refilling of each storage vessel for which an inspection is required by paragraphs 40 CFR 60.113b(a)(1) and 40 CFR 60.113b(a)(4) to afford the Administrator the opportunity to have an observer present. If the inspection required by paragraph 40 CFR 60.113b(a)(4) is not planned and the owner or operator could not have known about the inspection 30 days in advance of refilling the tank, the owner or operator shall notify the Administrator at least 7 days prior to the refilling of the storage vessel. Notification shall be made by telephone immediately followed by written documentation demonstrating why the inspection was unplanned. Alternatively, this notification including the written documentation may be made in writing and sent by express mail so that it is received by the Administrator at least 7 days prior to the refilling.



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**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, S2.031, and S2.032 (continued)**

5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023 (continued)

The Permittee shall meet the following requirements for **S2.031, and S2.032**:

- c. Reporting and Recordkeeping Requirements (40 CFR 60.115b)fixed roof

The Permittee shall meet the following requirements after installing a fixed roof and internal floating roof to comply with 40 CFR 60.112b(a)(1): (40 CFR 60.115b(a))

- (a) A report that describes the control equipment and certifies that the control equipment meets the specifications of 40 CFR 60.112b(a)(1) and 40 CFR 60.113b(a)(1). Prior to October 15, 2024, this report shall be an attachment to the notification required by 40 CFR 60.7(a)(3). Beginning October 15, 2024, the owner or operator must submit all subsequent reports in PDF format following the procedures specified in 40 CFR 60.115(d)(1). (40 CFR 60.115b(a)(1))
- (b) Keep a record of each inspection performed as required by 40 CFR 60.113b(a)(1), 40 CFR 60.113b(a)(2), 40 CFR 60.113b(a)(3), and 40 CFR 60.113b(a)(4). Each record shall identify the storage vessel on which the inspection was performed and shall contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings). (40 CFR 60.115b(a)(2))
- (c) If any of the conditions described in 40 CFR 60.113b(a)(2) are detected during the annual visual inspection required by 40 CFR 60.113b(a)(2), a report shall be furnished to the Administrator within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. Beginning October 15, 2024, all subsequent reports must be submitted in PDF format following the procedures in 40 CFR 60.115b(e). (40 CFR 60.115b(a)(3))
- (d) After each inspection required by 40 CFR 60.113b(a)(3) that finds holes or tears in the seal or seal fabric, or defects in the internal floating roof, or other control equipment defects listed in 40 CFR 60.113b(a)(3)(ii), a report shall be furnished to the Administrator within 30 days of the inspection. The report shall identify the storage vessel and the reason it did not meet the specifications of 40 CFR 60.112b(a)(1) or 40 CFR 60.113b(a)(3) and list each repair made. Beginning October 15, 2024, all subsequent reports must be submitted in PDF format following the procedures in 40 CFR 60.115b(e). (40 CFR 60.115b(a)(4))

- d. Monitoring of Operations (40 CFR 60.116b)

- (1) The Permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for each storage vessel as specified in 40 CFR 60.110b(a) for the life of the source. (40 CFR 60.116b(b))



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**Facility ID No. A1107**

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**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034 (continued)**

6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Kc – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023

The Permittee shall meet the following requirements for **S2.021 through S2.024**:

a. Standards for Volatile Organic Compounds (VOC) (40 CFR 60.112c)

The Permittee shall equip and operate each existing storage vessel with a capacity greater than or equal to 20,000 gallons (75.7 m<sup>3</sup>) but less than 40,000 gallons (151 m<sup>3</sup>), containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 1.5 psia (10.3 kPa) but less than 11.1 psia (76.6 kPa) an internal floating roof meeting the requirements in 40 CFR 60.112c(b). 40 CFR 60.112c(a)(1).

- (1) The internal floating roof must rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof must be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the roof supports, the process of filling, emptying, or refilling must be continuous and must be accomplished as rapidly as possible.
- (2) Except as provided in 40 CFR 60.112c(b)(14), each internal floating roof must be equipped with the following closure devices between the wall of the storage vessel and the edge of the internal floating roof:
  - (a) Two seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal is referred to as the primary seal, and the upper seal is referred to as the secondary seal.
  - (b) The primary seal must be either a mechanical shoe seal or a liquid-mounted seal. If a mechanical shoe seal is used, it must be installed so that one end of the shoe extends into the stored VOL and the other end extends a minimum vertical distance of 6 inches (15 centimeters) above the stored organic liquid surface.
  - (c) The secondary seal must be rim-mounted.
- (3) Each opening in a noncontact internal floating roof except for vacuum breaker/automatic bleeder vents and the rim vents is to provide a projection below the liquid surface.
- (4) Vacuum breaker/automatic bleeder vents must be equipped with a gasket and are to be closed at all times, with no visible gaps, when the roof is floating. Vacuum breaker/automatic bleeder vents must be set to open only when the roof is being floated off or is being landed on the roof supports.
- (5) Rim vents must be equipped with a gasket and must be closed at all times with no visible gaps when the roof is floating. Rim vents must be set to open only when the internal floating roof is not floating or when the pressure beneath the rim seal system exceeds the manufacturer's recommended setting.
- (6) Each penetration of the internal floating roof for the purpose of sampling must be a gauge hatch/sample well. Except as specified in 40 CFR 60.112c(b)(14), the gauge hatch/sample well must have a gasketed cover, which must be closed at all times, with no visible gaps, except when the hatch or well must be opened for access.
- (7) Each access hatch and gauge float well must be equipped with a cover that is gasketed and that is bolted or otherwise mechanically secured. The cover must be closed and must be bolted or otherwise mechanically secured at all times, with no visible gaps, except when the hatch or well must be opened for access.
- (8) Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof must have a flexible fabric sleeve seal or a gasketed sliding cover.
- (9) Each penetration of the internal floating roof that allows for passage of an unslotted leg ladder or unslotted ladder/guidepole combination must have a gasketed sliding cover. The cover must be closed at all times, with no visible gaps, except when the well must be opened for access.



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**Facility ID No. A1107**

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**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034 (continued)**

6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Kc – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023 (continued)

The Permittee shall meet the following requirements for **S2.021 through S2.024**: (continued)

a. Standards for Volatile Organic Compounds (VOC) (40 CFR 60.112c) (continued)

- (10) Each slotted guidepole must be equipped with one of the controls specified in 40 CFR 60.112c(b)(10)(i) through (v). The covers must be designed to be closed at all times, with no visible gaps, except when the cover must be opened for access.
  - (a) Gasketed sliding well cover, with pole sleeve. The sleeve must extend into the stored liquid.
  - (b) Gasketed sliding well cover, with pole sleeve and pole wiper. The sleeve must extend into the stored liquid.
  - (c) Gasketed sliding well cover, with pole float and pole wiper. The wiper or seal of the pole float must be at or above the height of the pole wiper.
  - (d) Gasketed sliding well cover, with pole float, pole sleeve, and pole wiper. The sleeve must extend into the stored liquid. The wiper or seal of the pole float must be at or above the height of the pole wiper.
  - (e) A flexible device that completely encloses the slotted guidepole and eliminates the hydrocarbon vapor emissions pathway from inside the storage vessel through the guidepole slots to the outside air; a gasketed guidepole cover at the top of the guidepole; and a gasketed sliding well cover positioned at the top of the guidepole well that seals any openings between the well cover and the guidepole (e.g., pole wiper), any openings between the well cover and any other objects that pass through the well cover, and any other openings in the top of the guidepole well.
- (11) Ladder-slotted guidepole combination wells must be equipped with a gasketed sliding well cover and a ladder sleeve. The sliding well cover must be designed to be closed at all times with no visible gaps, except when gauging or sampling.
- (12) Unslotted guidepoles must be equipped with one of the controls specified in 40 CFR 60.112c(b)(12)(i) or (ii). The controls must be designed to be closed at all times with no visible gaps.
  - (a) A gasketed guidepole cover at the top of the guidepole; a gasketed sliding well cover; and a pole sleeve. The guidepole cover must be closed at all times, except when required to be opened for access. The gasketed sliding well cover must seal any openings between the well cover and the guidepole, any openings between the well cover and any other objects that pass through the well cover, and any other openings in the top of the guidepole well.
  - (b) A gasketed guidepole cover at the top of the guidepole; a gasketed sliding well cover; and a pole wiper. The guidepole cover must be closed at all times, except when required to be opened for access. The gasketed sliding well cover must seal any openings between the well cover and the guidepole (e.g., pole wiper), any openings between the well cover and any other objects that pass through the well cover, and any other openings in the top of the guidepole well.
- (13) Except for leg sleeves and stub drains, each opening in the internal floating roof not specified in 40 CFR 60.112c(b)(4) through (1), must be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device must be opened for access. The cover or lid must be equipped with a gasket.
- (14) For each modified storage vessel as specified in 40 CFR 60.110c(d) with an existing internal floating roof, you may elect to comply with the rim seal system requirements in 40 CFR 60.112b(a)(1)(ii) or 40 CFR 60.110b(e) instead of the requirements in 40 CFR 60.112c(b)(2), and you may elect to comply with the gauge hatch/sample well requirements in 40 CFR 60.112b(a)(1)(vii) or 40 CFR 60.110b(e) instead of the requirements in 40 CFR 60.112c(b)(6).
- (15) A system equivalent to those described in paragraphs 40 CFR 60.112c(b)(1) through (14), as applicable, as provided in 40 CFR 60.114c.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034 (continued)**

6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Kc – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023 (continued)

The Permittee shall meet the following requirements for **S2.021 through S2.024**: (continued)

a. Standards for Volatile Organic Compounds (VOC) (40 CFR 60.112c) (continued)

(16) Equip, maintain, and operate each internal floating roof control system to maintain the vapor concentration above the floating roof at or below 25 percent of the lower explosive limit (LEL) on a 5-minute rolling average basis without the use of purge gas. This standard may require additional controls, such as improved seam seals, beyond those specified in 40 CFR 60.112c(b)(1) through (15). Compliance with 40 CFR 60.112c(b)(16) must be determined using the methods in 40 CFR 60.113c(a)(3). Exceeding the LEL is considered an inspection failure under 40 CFR 60.113c(a)(2)(i) and must be remedied as such. Any repairs made must be confirmed effective through re-monitoring of the LEL and meeting the limits in 40 CFR 60.112c(b)(16) within the timeframes specified in 40 CFR 60.113c(a)(2)(i).

b. Testing, Monitoring, and Inspection Procedures (40 CFR 60.113c)

Permittee must meet the requirements of 40 CFR 60.113c(a) for each storage vessel subject to the provision in 40 CFR 60.112c(a) that has installed an internal floating roof.

(1) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), and deck fittings prior to filling the storage vessel with VOL. Any of the conditions described in 40 CFR 60.113c(a)(1)(i) through (iii) constitutes inspection failure. You must repair the items before filling the storage vessel.

(a) Holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric;

(b) Defects in the internal floating roof; or

(c) A rim seal or deck fitting control not meeting the applicable requirements in 40 CFR 60.112c(b)(2) through (13).

(2) Inspect the internal floating roof as specified in 40 CFR 60.113c(a)(2)(i) at least once every 12 calendar months after initial fill, and inspect the internal floating roof as specified in 40 CFR 60.113c(a)(2)(ii) of this section each time the storage vessel is emptied and degassed, or at a frequency no greater than every 120 calendar months, whichever occurs first.

(a) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is service), and deck fittings, through openings in the fixed roof and conduct LEL monitoring. Any of the conditions described in 40 CFR 60.113c(a)(2)(i)(A) through (F) constitutes inspection failure. Identification of holes or tears in the rim seal is required only for the seal that is visible from the top of the storage vessel. You must repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in 40 CFR 60.113c(a)(2)(i) cannot be repaired within 45 days and if the storage vessel cannot be emptied within 45 days, you may request a 30-day extension from the Administrator. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the storage vessel will be emptied as soon as possible.

(i) Stored liquid on the floating roof;

(ii) The internal floating roof is not resting on the surface of the VOL inside the storage vessel;

(iii) Holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric;

(iv) Defects in the internal floating roof;

(v) A rim seal or deck fitting control not meeting the applicable requirements in 40 CFR 60.112c(b)(2) through (13); or

(vi) The concentration measured according to 40 CFR 60.113c(a)(3) exceeds 25 percent of the LEL.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034 (continued)**

6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Kc – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023 (continued)

The Permittee shall meet the following requirements for **S2.021 through S2.024**: (continued)

b. Testing, Monitoring, and Inspection Procedures (40 CFR 60.113c) (continued)

- (2) (b) Visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, slotted membranes, and sleeve seals (if any). Any of the conditions described in 40 CFR 60.113c(a)(2)(ii)(A) through (C) constitutes an inspection failure. You must repair the items as necessary so that none of the conditions specified in 40 CFR 60.113c(a)(2)(ii) exist before refilling the storage vessel with VOL. The inspection may be performed entirely from the top side of the floating roof, as long as there is visual access to all deck fittings and rim seal system specified in 40 CFR 60.112c(b). You must repair the items or empty and remove the storage vessel from service within 45 days. If a failure that is detected during inspections required in 40 CFR 60.113c(a)(2)(ii) cannot be repaired within 45 days and if the storage vessel cannot be emptied within 45 days, you may request a 30-day extension from the Administrator. Such a request for an extension must document that alternate storage capacity is unavailable and specify a schedule of actions the company will take that will assure that the control equipment will be repaired or the storage vessel will be emptied as soon as possible.
  - (i) Defects in the internal floating roof;
  - (ii) Holes, tears, or other openings in the primary seal, the secondary seal, or the seal fabric; or
  - (iii) A rim seal or deck fitting control not meeting the applicable requirements in 40 CFR 60.113c(b)(2) through (13).
- (3) Compliance with the LEL limit for internal floating roof storage vessels at 40 CFR 60.113c(b)(16) must be determined based on the procedures specified in 40 CFR 60.113c(a)(3)(i) through (v). If tubing is necessary to obtain the measurements, the tubing must be non-crimping and made of Teflon or other inert material.
  - (a) You must conduct LEL monitoring as part of the annual inspection specified in 40 CFR 60.113c(a)(2)(i) and at other times upon request by the Administrator. If the measurement cannot be performed during the visual inspection due to wind speeds exceeding those specified in 40 CFR 60.113c(a)(3)(iii)(C), the measurement must be performed within 30 days of the visual inspection. If there is an exceedance of the LEL limit, you must re-monitor in accordance with 40 CFR 60.112c(b)(16) within 30 days after repair or placing the storage vessel back in service.
  - (b) The calibration of the LEL meter must be checked per manufacturer specifications immediately before and after the measurements as specified in 40 CFR 60.113c(a)(3)(ii)(A) and (B). If tubing will be used for the measurements, the tubing must be attached during calibration so that the calibration gas travels through the entire measurement system.
    - (i) Conduct the span check using a calibration gas recommended by the LEL meter manufacturer. The calibration gas must contain a single hydrocarbon at a concentration of the vapor corresponding to 50 percent of the LEL (*e.g.*, 2.50 percent by volume when using methane as the calibration gas). The vendor must provide a Certificate of Analysis for the gas, and the certified concentration must be within  $\pm 2$  percent (*e.g.*, 2.45 percent-2.55 percent by volume when using methane as the calibration gas). The LEL span response must be between 49 percent and 51 percent. If the span check prior to the measurements does not meet this requirement, the LEL meter must be recalibrated or replaced. If the span check after the measurements does not meet this requirement, the LEL meter must be recalibrated or replaced, and the measurements must be repeated.
    - (ii) Check the instrumental offset response using a certified compressed gas cylinder of zero air or an ambient environment that is free of organic compounds. The pre-measurement instrumental offset response must be 0 percent LEL. If the LEL meter does not meet this requirement, the LEL meter must be recalibrated or replaced.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034 (continued)**

6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Kc – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023 (continued)

The Permittee shall meet the following requirements for **S2.021 through S2.024**: (continued)

b. Testing, Monitoring, and Inspection Procedures (40 CFR 60.113c) (continued)

- (3) (c) Conduct the monitoring measurements as specified in 40 CFR 60.113c(a)(3)(iii)(A) through (D).
  - (i) Measurements of the vapors within the internal floating roof storage vessel must be collected no more than 3 feet above the internal floating roof.
  - (ii) Measurements must be taken for a minimum of 20 minutes, logging the measurements at least once every 15 seconds, or until one 5-minute average as determined according to 40 CFR 60.113c(a)(3)(v)(B) exceeds the limit specified in 40 CFR 60.112c(b)(16).
  - (iii) Measurements shall be taken when the wind speed at the top of the storage vessel is 5 mph or less to the extent practicable, but in no case shall measurements be taken when the sustained wind speed at top of storage vessel is greater than the annual average wind speed at the site or 15 mph, whichever is less.
  - (iv) Measurements should be conducted when the internal floating roof is floating with limited product movement (limited filling or emptying of the storage vessel).
- (d) To determine the actual concentration of the vapor within the storage vessel, the percent of the LEL “as the calibration gas” must be corrected according to one of the procedures in 40 CFR 60.113c(a)(3)(iv)(A) or (B). Alternatively, if the LEL meter used has correction factors that can be selected from the meter's program, you may enable this feature to automatically apply one of the correction factors in 40 CFR 60.113c(a)(3)(iv)(A) or (B).
  - (i) Multiply the measurement by the published vapor correction factor for the specific LEL meter, stored VOL, and calibration gas used; or
  - (ii) If there is no published correction factor for the specific LEL meter used and the vapors of the stored VOL, multiply the measurement by the published correction factor for butane as a surrogate for determining the LEL of the vapors of the stored VOL. The correction factor must correspond to the calibration gas used.
- (e) Use the calculation procedures in 40 CFR 60.113c(a)(3)(v)(A) through (C) to determine compliance with the LEL limit.
  - (i) For each minute while measurements are being taken, determine the 1-minute average reading as the arithmetic average of the corrected individual measurements (taken at least once every 15 seconds) during the minute.
  - (ii) Starting with the end of the fifth minute of data, calculate a 5-minute rolling average as the arithmetic average of the previous five 1-minute readings determined under 40 CFR 60.113c(a)(3)(v)(A). Determine a new 5-minute average reading for every subsequent 1-minute reading.
  - (iii) Each 5-minute rolling average must meet the LEL limit specified in 40 CFR 60.112c(b)(16).
- (f) Notify the Administrator as specified in 40 CFR 60.116c(b) at least 30 days prior to the inspection of each storage vessel for which an inspection is required by 40 CFR 60.113c(a)(1) or 40 CFR 60.113c(a)(2)(ii) to afford the Administrator the opportunity to have an observer present.
- (g) Permittee must equip each affected storage vessel that has an internal floating roof with an alarm system that provides a visual or audible signal that alerts the operator when the internal floating roof is approaching the landed height and that provides a separate visual or audible signal to alert the operator when the roof has landed. The roof is considered landed when the floating roof first rests on supports or when the vacuum breaker/automatic bleeder vent begins to open, whichever is first (for example, when using a leg-actuated vent that triggers the vent prior to resting on the roof supports).



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034 (continued)**

6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Kc – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023 (continued)

The Permittee shall meet the following requirements for **S2.021 through S2.024**: (continued)

c. Testing, Monitoring, and Inspection Procedures (40 CFR 60.113c)

Permittee must meet the requirements of 40 CFR 60.113c(d) for each storage vessel subject to the provision in 40 CFR 60.112c(a) that has installed an internal floating roof. Permittee must determine the maximum true vapor pressure of the stored VOL for each storage vessel according to the requirements specified in 40 CFR 60.113c(d)(1) and (2). For storage vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For storage vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.

(1) Prior to the initial filling of the storage vessel or to the refilling of the storage vessel with a new VOL, the highest maximum true vapor pressure for the range of anticipated liquids to be stored, including mixtures for which you can define the range of concentrations for constituents in the mixture or with a known maximum Reid vapor pressure, must be determined using any one of the methods described in 40 CFR 60.113c(d)(1)(i) through (iv).

(a) As obtained from standard reference texts.

(b) ASTM D6377-20 (incorporated by reference; see 40 CFR 60.17. Perform the method using a vapor-to-liquid ratio of 4:1, which is expressed in the method as VPCR.

(c) ASTM D6378-22 (incorporated by reference; see 40 CFR 60.17. Perform the method using a vapor-to-liquid ratio of 4:1.

(d) As measured by an appropriate method as approved by the Administrator.

(2) For each affected storage vessel storing a mixture of indeterminate composition or a mixture of unknown variable composition, the initial determination of the vapor pressure required by 40 CFR 60.113c(d)(1) must be a physical test using one of the methods specified in 40 CFR 60.113c(d)(1)(ii) through (iv). Additional physical tests using one of the methods specified in 40 CFR 60.113c(d)(1)(ii) through (iv) are required at least once every 6 calendar months thereafter as long as the measured vapor pressure remains below the applicable thresholds in 40 CFR 60.113c(c)(1), (c)(2), (d)(1), or (d)(2). If the vapor pressure measured under 40 CFR 60.113c(d)(2) exceeds the threshold defined in 40 CFR 60.110c(c)(1), (c)(2), (d)(1), or (d)(2), Permittee must meet the requirements in 40 CFR 60.112c and the corresponding requirements in 40 CFR 60.113c through 40 CFR.116c. If the storage vessel does not have controls meeting the requirements in 40 CFR 60.112c, the storage vessel must be emptied and taken out of service until controls meeting the requirements in 40 CFR 60.112c can be installed. Upon compliance with the provisions in 40 CFR 60.112c, no additional vapor pressure monitoring is required.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034 (continued)**

6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Kc – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023 (continued)

The Permittee shall meet the following requirements for **S2.021 through S2.024**: (continued)

d. Recordkeeping Requirements (40 CFR 60.115c)

- (1) Except as otherwise specified in 40 CFR 60.115c(b) through (d), Permittee must keep copies of all records required by this section and all reports required under 40 CFR 60.116c for at least 5 years.
- (2) For each storage vessel affected facility as specified in 40 CFR 60.110c(a), Permittee must keep readily accessible records for the life of the source showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
- (3) Except as provided in 40 CFR 60.115c(1) and (2), for each storage vessel affected facility under this subpart, Permittee must maintain a record of the VOL currently stored, including a description of the VOL stored, the date when the VOL was first stored in the storage vessel, and the maximum true vapor pressure of that VOL.
  - (a) For each vessel storing a mixture of indeterminate or variable composition that meets the requirements for vapor pressure measurement at least once every 6 calendar months in 40 CFR 60.113c(d), Permittee must maintain records of each vapor pressure measurement for 5 years.
- (4) For each storage vessel as specified in 40 CFR 60.112c(a), Permittee must keep records as required in 40 CFR 60.115c(d)(1) through (5), as applicable depending upon the control equipment installed to meet the requirements of 40 CFR 60.112c.
  - (a) After installing control equipment for an internal floating roof to meet the provisions in 40 CFR 60.112c(b), Permittee must keep the following records.
    - (i) Keep a record of each inspection performed as required by 40 CFR 60.113c(a)(1), (a)(2)(i), and (a)(2)(ii). Each record must identify the storage vessel on which the inspection was performed and must contain the date the vessel was inspected and the observed condition of each component of the control equipment (seals, internal floating roof, and fittings).
    - (ii) For each LEL monitoring event, keep records as specified in 40 CFR 60.115c(a)(1)(ii)(A) through (I).
      - (A) Date and time of the LEL monitoring, and the storage vessel being monitored.
      - (B) A description of the monitoring event (annual monitoring conducted concurrent with visual inspection required under 40 CFR 60.113c(a)(2)(i); re-monitoring due to high winds during annual monitoring; re-monitoring after repair attempt; other monitoring event as required by the Administrator).
      - (C) Wind speed at the top of the storage vessel on the date of LEL monitoring.
      - (D) The LEL meter manufacturer and model number used, as well as an indication of whether tubing was used during the LEL monitoring, and if so, the type and length of tubing used.
      - (E) Calibration checks conducted before and after making the measurements, including both the span check and instrumental offset. This includes the hydrocarbon used as the calibration gas, the Certificate of Analysis for the calibration gas(es), the results of the calibration check, and any corrective action for calibration checks that do not meet the required response.
      - (F) Location of the measurements and the location of the floating roof.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

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**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034 (continued)**

6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Kc – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023 (continued)

The Permittee shall meet the following requirements for **S2.021 through S2.024**: (continued)

d. Recordkeeping Requirements (40 CFR 60.115c) (continued)

- (4) (a) (ii) (G) Each measurement (taken at least once every 15 seconds). The records should indicate whether the recorded values were automatically corrected using the meter's programming. If the values were not automatically corrected, record both the raw (as the calibration gas) and corrected measurements, as well as the correction factor used.
- (H) Each of the 5-minute rolling average readings.
- (I) If the vapor concentration of the storage vessel was above 25 percent of the LEL on a 5-minute rolling average basis, a description of whether the floating roof was repaired, replaced, or taken out of service.

e. Reporting Requirements (40 CFR 60.116c)

- (1) Permittee must submit initial notifications along with the requested information to the Administrator as required in 40 CFR 116c(a).
- (2) Permittee must submit notifications to the Administrator for filling and refilling an affected storage vessel and for conducting gap measurements as required in 40 CFR 60.116c(b).
- (3) Permittee must submit to the Administrator semi-annual reports with the applicable information as required in 40 CFR 60.116c(c) and (d).
- (4) Permittee must submit the results any required performance tests as required in 40 CFR 60.116c(e).



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

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**CLASS II AIR QUALITY OPERATING PERMIT**

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**Section V. Specific Operating Conditions (continued)**

**F. Emission Units S2.009, S2.010, S2.013, S2.014, S2.015, S2.021, S2.022, S2.023, S2.024, and S2.031 through S2.034 (continued)**

7. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Kc – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After October 4, 2023

The Permittee shall meet the following requirements for **S2.009, S2.010, S2.015, S2.033, and S2.034:**

a. Applicability and Designation of Affected Facility, (40 CFR 60.110c)

- (1) The affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 20,000 gallons (gal) (75.7 cubic meters (m<sup>3</sup>)) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after October 4, 2023. (40 CFR 60.110c(a))
- (2) Storage vessels that are affected facilities according to 40 CFR 60.110c(a) and do not meet the criteria in either 40 CFR 60.110c(c)(1), (c)(2), (d)(1), or (d)(2) are subject to the requirements in 40 CFR 60.113c(d), if applicable, 40 CFR 60.115c(b)

b. Testing, Monitoring, and Inspection Procedures (40 CFR 60.113c)

For each affected storage vessel, Permittee must determine the maximum true vapor pressure of the stored VOL according to the requirements specified in 40 CFR 60.113c(d)(1) and (2). For storage vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For storage vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service. 40 CFR 60.113c(d)

- (1) Prior to the initial filling of the storage vessel or to the refilling of the storage vessel with a new VOL, the highest maximum true vapor pressure for the range of anticipated liquids to be stored, including mixtures for which you can define the range of concentrations for constituents in the mixture or with a known maximum Reid vapor pressure, must be determined using any one of the methods described in 40 CFR 60.113c(d)(1)(i) through (iv).
  - (a) As obtained from standard reference texts.
  - (b) ASTM D6377-20 (incorporated by reference; see 40 CFR 60.16. Perform the method using a vapor-to-liquid ratio of 4:1, which is expressed in the method as VPCR.
  - (c) ASTM D6378-22 (incorporated by reference; see 40 CFR 60.17. Perform the method using a vapor-to-liquid ratio of 4:1.
  - (d) As measured by an appropriate method as approved by the Administrator.

- (2) For each affected storage vessel storing a mixture of indeterminate composition or a mixture of unknown variable composition, the initial determination of the vapor pressure required by 40 CFR 60.113c(d)(1) must be a physical test using one of the methods specified in 40 CFR 60.113c(d)(1)(ii) through (iv). Additional physical tests using one of the methods specified in 40 CFR 60.113c(d)(1)(ii) through (iv) are required at least once every 6 calendar months thereafter as long as the measured vapor pressure remains below the applicable thresholds in 40 CFR 60.110c(c)(1), (c)(2), (d)(1), or (d)(2). If the vapor pressure measured under this 40 CFR 60.113c(d)(2) exceeds the threshold defined in 40 CFR 60.110c(c)(1), (c)(2), (d)(1), or (d)(2) Permittee must meet the requirements in 40 CFR 60.112c and the corresponding requirements in 40 CFR 60.113c through 60.116c. If the storage vessel does not have controls meeting the requirements in 40 CFR 60.112c, the storage vessel must be emptied and taken out of service until controls meeting the requirements in 40 CFR 60.112c can be installed. Upon compliance with the provisions in 40 CFR 60.112c, no additional vapor pressure monitoring is required.

c. Recordkeeping Requirements (40 CFR 60.115c)

- (1) For each storage vessel affected facility as specified in 40 CFR 60.110c(a), Permittee must keep readily accessible records for the life of the source showing the dimension of the storage vessels and an analysis showing the capacity of the storage vessels. 40 CFR 60.115c(b)



Bureau of Air Pollution Control

Facility ID No. A1107

Draft Permit No. AP2869-3847.01

CLASS II AIR QUALITY OPERATING PERMIT

Issued to: NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

Section V. Specific Operating Conditions (continued)

G. Emission Unit S2.016

System 7 – 500 Ton Cooling Tower (Revised – July 2025, Air Case 11992)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.016	500 Ton Cooling Tower	4,381,220	283,634

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. Emissions from **S2.016** shall be controlled by drift eliminators to reduce the cooling tower drift losses to the manufacturer’s specification of **0.005%** or less.
  - b. Descriptive Stack Parameters  
 Stack Height: 15.0 feet  
 Stack Diameter: 11.0 feet  
 Stack Temperature: ambient
  
2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. The maximum circulating water flow rate for **S2.016** will not exceed **1,500** gallons per minute.
  - b. The maximum Total Dissolved Solids (TDS) content for **S2.016** will not exceed **2,000** milligrams per liter (ppm).
  - c. The use of chromium-based water treatment chemicals is prohibited.
  - d. Hours  
 (1) **S2.016** may operate a total of **24** hours per day.
  
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.016** the following pollutants in excess of the following specified limits:
  - a. The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **0.075** pounds per hour, nor more than **0.33** tons per year.
  - b. The discharge of **PM<sub>10</sub>** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **0.075** pounds per hour, nor more than **0.33** tons per year.
  - c. The discharge of **PM<sub>2.5</sub>** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **0.075** pounds per hour, nor more than **0.33** tons per year.
  - d. The opacity from **S2.016** shall not equal or exceed **20** percent.
  
4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.
  - a. Monitor and record the cooling water circulation rate (in gallons per minute) for **S2.016** on a daily basis.
  - b. Monitor and record the hours of operation for **S2.016** on a daily basis.
  - c. The Permittee shall sample the cooling tower circulating feed water from **S2.016** and determine the total dissolved solids (TDS, reported in mg per liter, or ppm by weight), on a quarterly basis. The TDS concentration will be determined using Standard Method 2540 C-2011 or ASTM Method D5907-13, or alternative methods approved in advance by the Director.



Bureau of Air Pollution Control

Facility ID No. A1107

Draft Permit No. AP2869-3847.01

CLASS II AIR QUALITY OPERATING PERMIT

Issued to: NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

Section V. Specific Operating Conditions (continued)

H1. Emission Unit S2.017

Table with 3 columns: System 8A - Natural Gas Fired Boiler (Revised - July 2025, Air Case 11992), Location UTM (Zone 11, NAD 83) m North, m East. Row 1: S2.017, 4.2 MMBtu/hr NG Fired Boiler #1 (Mfr Superior Boiler, mfd 2018), 4,381,232, 283,520

- 1. Air Pollution Control Equipment (NAC 445B.346(1)) (Federally Enforceable SIP Requirement)
a. S2.017 has no add-on controls.
b. Descriptive Stack Parameters
Stack Height: 20 feet
Stack Diameter: 1.33 feet
Stack Temperature: 317 °F
Exhaust Flow: 7,024 actual cubic feet per minute (dscfm)
2. Operating Parameters (NAC 445B.346(1)) (Federally Enforceable SIP Requirement)
a. S2.017 may consume only natural gas.
b. The maximum allowable fuel consumption rate for S2.017 shall not exceed 4,117.6 standard cubic feet (scf) per any one-hour period.
c. Hours
(1) S2.017 may operate a total of 24 hours per day.
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (Federally Enforceable SIP Requirement)
The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from S2.017 the following pollutants in excess of the following specified limits:
a. The discharge of PM (particulate matter) to the atmosphere shall not exceed 0.031 pounds per hour, nor more than 0.14 tons per year.
b. The discharge of PM10 (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed 0.031 pounds per hour, nor more than 0.14 tons per year.
c. The discharge of PM2.5 (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed 0.031 pounds per hour, nor more than 0.14 tons per year.
d. The discharge of SO2 (sulfur dioxide) to the atmosphere shall not exceed 0.0025 pounds per hour, nor more than 0.011 tons per year.
e. The discharge of NOx (oxides of nitrogen) to the atmosphere shall not exceed 0.41 pounds per hour, nor more than 1.80 tons per year.
f. The discharge of CO (carbon monoxide) to the atmosphere shall not exceed 0.35 pounds per hour, nor more than 1.51 tons per year.
g. The discharge of VOCs (volatile organic compounds) to the atmosphere shall not exceed 0.023 pounds per hour, nor more than 0.099 tons per year.
h. The opacity from S2.017 shall not equal or exceed 20 percent.
4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (Federally Enforceable SIP Requirement)
The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.
a. Monitor and record the hours of operation for S2.017 on a daily basis.
b. Monitor and record the consumption rate of natural gas on a daily basis for S2.017 (in scf) by multiplying the maximum hourly fuel consumption rate as stated in H1.2.b of this section and the total daily hours of operation.



Bureau of Air Pollution Control

Facility ID No. A1107

Draft Permit No. AP2869-3847.01

CLASS II AIR QUALITY OPERATING PERMIT

Issued to: NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

Section V. Specific Operating Conditions (continued)

H2. Emission Unit S2.018

Table with 3 columns: System 8B - Natural Gas Fired Boiler (Revised - July 2025, Air Case 11992), Location UTM (Zone 11, NAD 83) m North, m East. Row 1: S2.018, 21.0 MMBtu/hr NG Fired Boiler #2 (Mfr Webster Combustion, mfd 2018), 4,381,221, 283,605

- 1. Air Pollution Control Equipment (NAC 445B.346(1)) (Federally Enforceable SIP Requirement)
a. S2.018 has no add-on controls.
b. Descriptive Stack Parameters
Stack Height: 21.0 feet
Stack Diameter: 2.0 feet
Stack Temperature: 313 °F
Exhaust Flow: 2,400 actual cubic feet per minute (dscfm)
2. Operating Parameters (NAC 445B.346(1)) (Federally Enforceable SIP Requirement)
a. S2.018 may consume only natural gas.
b. The maximum allowable fuel consumption rate for S2.018 shall not exceed 20,588.2 standard cubic feet (scf) per any one-hour period.
c. Hours
(1) S2.018 may operate a total of 24 hours per day.
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (Federally Enforceable SIP Requirement)
The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from S2.018 the following pollutants in excess of the following specified limits:
a. The discharge of PM (particulate matter) to the atmosphere shall not exceed 0.16 pounds per hour, nor more than 0.69 tons per year.
b. The discharge of PM10 (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed 0.16 pounds per hour, nor more than 0.69 tons per year.
c. The discharge of PM2.5 (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed 0.16 pounds per hour, nor more than 0.69 tons per year.
d. The discharge of SO2 (sulfur dioxide) to the atmosphere shall not exceed 0.012 pounds per hour, nor more than 0.054 tons per year.
e. The discharge of NOx (oxides of nitrogen) to the atmosphere shall not exceed 2.06 pounds per hour, nor more than 9.02 tons per year.
f. The discharge of CO (carbon monoxide) to the atmosphere shall not exceed 1.73 pounds per hour, nor more than 7.57 tons per year.
g. The discharge of VOCs (volatile organic compounds) to the atmosphere shall not exceed 0.11 pounds per hour, nor more than 0.50 tons per year.
h. The opacity from S2.018 shall not equal or exceed 20 percent.
4. Monitoring and Recordkeeping (NAC 445B.346(2)) (Federally Enforceable SIP Requirement)
The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.
a. Monitor and record the hours of operation for S2.018 on a daily basis.
b. Monitor and record the consumption rate of natural gas on a daily basis for S2.018 (in scf) by multiplying the maximum hourly fuel consumption rate as stated in H2.2.b of this section and the total daily hours of operation.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**H2. Emission Unit S2.018 (continued)**

5. Performance and Compliance Testing (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
The Permittee, upon issuance of this operating permit, shall conduct renewal performance testing at least 90 days prior to the expiration of this operating permit, but no earlier than 365 days from the date of expiration of this operating permit, and every 5 years thereafter, in accordance with the following:
  - a. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on the arithmetic average of three valid runs (NAC 445B.252(5)).
  - b. Testing shall be conducted on the exhaust stack (post controls).
  - c. Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
  - d. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
  - e. Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
  
6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
  - a. Reporting and Recordkeeping Requirements (40 CFR Part 60.48c)
    - (1) The Permittee shall submit notification of the date of construction or reconstruction and actual startup, as provided by 40 CFR 60.7. This notification shall include: (40 CFR Part 60.48c(a))
      - (a) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility. (40 CFR 60.48c(a)(1))
      - (b) The annual capacity factor at which the permittee anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired. (40 CFR 60.48c(a)(3))
    - (2) Except as provided under 40 CFR 60.48(g)(2) and (g)(3), the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day. (40 CFR Part 60.48c(g))
      - (a) As an alternative to meeting the requirements of 40 CFR Part 60.48c (g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO<sub>2</sub> standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month. (40 CFR 60.48c(g)(2))
      - (b) As an alternative to meeting the requirements of 40 CFR 60.48c (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO<sub>2</sub> standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. (40 CFR Part 60.48c(g)(3))
    - (3) All records required under 40 CFR Part 60.48c shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. (40 CFR Part 60.48c(i))
    - (4) The reporting period for the reports required under 40 CFR Part 60, Subpart Dc, is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period. (40 CFR Part 60.48c(j))



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**H3. Emission Unit S2.019**

System 8C – Natural Gas Fired Boiler (Revised – July 2025, Air Case 11992)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.019	10.1 MMBtu/hr NG Fired Boiler #3 (Mfr Victory Boiler, mfd 2022)	4,381,258	283,437

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.019** has no add-on controls.
  - b. Descriptive Stack Parameters  
 Stack Height: 28.0 feet  
 Stack Diameter: 1.2 feet  
 Stack Temperature: 315 °F  
 Exhaust Flow: 2,085 actual cubic feet per minute (dscfm)
  
2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.019** may consume only **natural gas**.
  - b. The maximum allowable fuel consumption rate for **S2.019** shall not exceed **9,902.0 standard cubic feet (scf)** per any one-hour period.
  - c. Hours  
 (1) **S2.019** may operate a total of **24** hours per day.
  
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.019** the following pollutants in excess of the following specified limits:
  - a. The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **0.075** pounds per hour, nor more than **0.33** tons per year.
  - b. The discharge of **PM<sub>10</sub>** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **0.075** pounds per hour, nor more than **0.33** tons per year.
  - c. The discharge of **PM<sub>2.5</sub>** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **0.075** pounds per hour, nor more than **0.33** tons per year.
  - d. The discharge of **SO<sub>2</sub>** (sulfur dioxide) to the atmosphere shall not exceed **0.0059** pounds per hour, nor more than **0.026** tons per year.
  - e. The discharge of **NO<sub>x</sub>** (oxides of nitrogen) to the atmosphere shall not exceed **0.99** pounds per hour, nor more than **4.34** tons per year.
  - f. The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **0.83** pounds per hour, nor more than **3.64** tons per year.
  - g. The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.054** pounds per hour, nor more than **0.24** tons per year.
  - h. The opacity from **S2.019** shall not equal or exceed **20** percent.
  
4. Monitoring and Recordkeeping (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.
  - a. Monitor and record the hours of operation for **S2.019** on a daily basis.
  - b. Monitor and record the consumption rate of **natural gas** on a daily basis for **S2.019** (in **scf**) by multiplying the maximum hourly fuel consumption rate as stated in **H3.2.b** of this section and the total daily hours of operation.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**H3. Emission Unit S2.019 (continued)**

5. Performance and Compliance Testing (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
The Permittee, upon issuance of this operating permit, shall conduct renewal performance testing at least 90 days prior to the expiration of this operating permit, but no earlier than 365 days from the date of expiration of this operating permit, and every 5 years thereafter, in accordance with the following:
  - a. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on the arithmetic average of three valid runs (NAC 445B.252(5)).
  - b. Testing shall be conducted on the exhaust stack (post controls).
  - c. Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
  - d. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
  - e. Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
  
6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
  - a. Reporting and Recordkeeping Requirements (40 CFR Part 60.48c)
    - (1) The Permittee shall submit notification of the date of construction or reconstruction and actual startup, as provided by 40 CFR 60.7. This notification shall include: (40 CFR Part 60.48c(a))
      - (a) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility. (40 CFR 60.48c(a)(1))
      - (b) The annual capacity factor at which the permittee anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired. (40 CFR 60.48c(a)(3))
    - (2) Except as provided under 40 CFR 60.48(g)(2) and (g)(3), the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day. (40 CFR Part 60.48c(g))
      - (a) As an alternative to meeting the requirements of 40 CFR Part 60.48c (g)(1), the owner or operator of an affected facility that combusts only natural gas, wood, fuels using fuel certification in 40 CFR 60.48c(f) to demonstrate compliance with the SO<sub>2</sub> standard, fuels not subject to an emissions standard (excluding opacity), or a mixture of these fuels may elect to record and maintain records of the amount of each fuel combusted during each calendar month. (40 CFR 60.48c(g)(2))
      - (b) As an alternative to meeting the requirements of 40 CFR 60.48c (g)(1) of this section, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, wood, distillate oil meeting the most current requirements in 40 CFR 60.42c to use fuel certification to demonstrate compliance with the SO<sub>2</sub> standard, and/or fuels, excluding coal and residual oil, not subject to an emissions standard (excluding opacity) may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. (40 CFR Part 60.48c(g)(3))
    - (3) All records required under 40 CFR Part 60.48c shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record. (40 CFR Part 60.48c(i))
    - (4) The reporting period for the reports required under 40 CFR Part 60, Subpart Dc, is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period. (40 CFR Part 60.48c(j))



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**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**I. Emission Units S2.025 and S2.026**

System 9 – Diesel Fire Pump Engines (Added – July 2025, Air Case 11992)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.025	Diesel Fire Suppression Pump Engine #1 (East), (350HP Clarke Fire Pump; John Deere Engine, mdl # 6090HFC47, mfd 2018)	4,381,210	283,463
S2.026	Diesel Fire Suppression Pump Engine #2 (West), (350HP Clarke Fire Pump; John Deere Engine, mdl # 6090HFC47, mfd 2018)	4,381,210	283,462

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.025 and S2.026, each**, have no add-on controls.
  - b. Descriptive Stack Parameters for S2.025 and S2.026  
 Stack Height: 8.25 feet  
 Stack Diameter: 0.5 feet  
 Stack Temperature: 842 °F
  
2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.025 and S2.026, each**, may consume only **diesel**.
  - b. The maximum allowable fuel consumption rate for **S2.025 and S2.026, each**, shall not exceed **17.5 gallons** per any one-hour period.
  - c. Hours
    - (1) **S2.025 and S2.026, each**, may operate a total of **24** hours per day.
    - (2) **S2.025 and S2.026, each**, may operate a maximum of **100** hours per year of non-emergency use. There is no time limit on operation in emergency situations.
  
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.025 and S2.026, each**, the following pollutants in excess of the following specified limits:
  - a. The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **0.085** pounds per hour, nor more than **0.0042** tons per year.
  - b. The discharge of **PM<sub>10</sub>** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **0.085** pounds per hour, nor more than **0.0042** tons per year.
  - c. The discharge of **PM<sub>2.5</sub>** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **0.085** pounds per hour, nor more than **0.0042** tons per year.
  - d. The discharge of **SO<sub>2</sub>** (sulfur dioxide) to the atmosphere shall not exceed **0.72** pounds per hour, nor more than **0.036** tons per year.
  - e. The discharge of **NO<sub>x</sub>** (oxides of nitrogen) to the atmosphere shall not exceed **2.04** pounds per hour, nor more than **0.10** tons per year.
  - f. The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **0.54** pounds per hour, nor more than **0.027** tons per year.
  - g. The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.069** pounds per hour, nor more than **0.0035** tons per year.
  - h. The opacity from **S2.025 and S2.026, each**, shall not equal or exceed **20** percent.



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**Facility ID No. A1107**

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**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**I. Emission Units S2.025 and S2.026 (continued)**

4. Monitoring, Recordkeeping, and Reporting (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

- a. Monitor and record the total daily hours of operation for **S2.025 and S2.026, each**, for each day of operation. The Permittee shall note which hours of operation are emergency hours, and which hours of operation are hours for non-emergency use.
- b. Monitor and record the consumption rate of **diesel** on a daily basis for **S2.025 and S2.026, each**, (in **gallons**) by multiplying the maximum hourly fuel consumption rate as stated in **I.2.b** of this section and the total daily hours of operation.
- c. Monitor and record the total yearly hours of operation of **S2.025 and S2.026, each**, per year. The annual hours of operation shall be determined at the end of each month as the sum of the monthly hours of operation for all previous months of that year.
- d. The Permittee, upon issuance of this operating permit, shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. (40 CFR 60.7(b))

5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)

New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

a. Emissions Standards (40 CFR 60.4202, 40 CFR 60.4205)

The Permittee must comply with the emission standards in Table 4 of 40 CFR Part 60 Subpart IIII, for all pollutants, for the same model year and National Fire Protection Association (NFPA) maximum engine power. (40 CFR 60.4202(d), 40 CFR 60.4205(c))

- (1) For a 2009 model year and later stationary fire pump engine with a maximum engine power of **225 ≤ kW ≤ 450 (300 ≤ hp ≤ 600)** and less than 30 liters per cylinder: (40 CFR 60.4202(d), 40 CFR 4205(c), Table 4)
  - (a) The discharge of PM to the atmosphere shall not exceed **0.2 gram/kW-hr (0.15 gram/hp-hr) (0.12 pounds per hour)**.
  - (b) The discharge of non-methane hydrocarbon (NMHC) + NO<sub>x</sub> to the atmosphere shall not exceed **4.0 grams/kW-hr (3.0 grams/hp-hr) (2.31 pounds per hour)**.
  - (c) The discharge of carbon monoxide (CO) to the atmosphere shall not exceed **3.5 grams/kW-hr (2.6 gram/hp-hr)(2.01 pounds per hour)**.

b. Fuel Requirements (40 CFR 60.4207)

The Permittee must meet the following diesel requirements for non-road engine: (40 CFR 60.4207(b), 40 CFR 1090.305)

- (1) Sulfur content to be 15 parts per million (ppm) maximum.
- (2) A minimum cetane index of 40; or
- (3) A maximum aromatic content of 35 volume percent.

c. Monitoring Requirements (40 CFR 60.4209)

If the CI ICE does not meet the standards applicable to non-emergency engines, the Permittee must install a non-resettable hour meter prior to startup of the engine. (40 CFR 60.4209(a))



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**I. Emission Units S2.025 and S2.026 (continued)**

5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (continued)
  - d. Compliance Requirements (40 CFR 60.4206, 40 CFR 60.4211)
    - (1) The Permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in 40 CFR 60.4205 over the entire life of the engine. (40 CFR 60.4206)
    - (2) The Permittee must operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; change only those emission-related settings that are permitted by the manufacturer; and meet the requirements of 40 CFR Part 1039. (40 CFR 60.4211(a))
    - (3) The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in **I.5.d.(5)** of this section. (40 CFR 60.4211(c))
    - (4) In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs **I.5.d.(4)(a) through (c)** of this section, is prohibited. If the Permittee do not operate the engine according to the requirements in paragraphs **I.5.d.(4)(a) through (c)** of this section, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. (40 CFR 60.4211(f))
      - (a) There is no time limit on the use of emergency stationary ICE in emergency situations. (40 CFR 60.4211(f)(1))
      - (b) The Permittee may operate the Permittee's emergency stationary ICE for any combination of the purposes specified in paragraphs **I.5.d.(4)(b)** of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraph **I.5.d.(4)(c)** of this section counts as part of the 100 hours per calendar year. (40 CFR 60.4211(f)(2))
        - i. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. (40 CFR 60.4211(f)(2)(i))
      - (c) Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in paragraph **I.5.d.(4)(b)** of this section. Except as provided in paragraph **I.5.d.(4)(c)** of this section, the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. (40 CFR 60.4211(f)(3))
        - i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the conditions in 40 CFR 60.4211(f)(3)(i)(A) through (E) are met. (40 CFR 60.4211(f)(3)(i))



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**I. Emission Units S2.025 and S2.026 (continued)**

5. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
New Source Performance Standards (NSPS) – 40 CFR Part 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (continued)
  - d. Compliance Requirements (40 CFR 60.4206, 40 CFR 60.4211) (continued)
    - (5) If the Permittee does not install, configure, operate, and maintain the Permittee's engine and control device according to the manufacturer's emission-related written instructions, or the Permittee change emission-related settings in a way that is not permitted by the manufacturer, the Permittee must demonstrate compliance as follows: (40 CFR 4211(g))
      - (a) For CI ICE greater than or equal to 100 HP and less than or equal to 500 hp, the Permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the Permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after the Permittee change emission-related settings in a way that is not permitted by the manufacturer. (40 CFR 60.4211(g)(2))
  - e. National Emission Standards for Hazardous Air Pollutants for Source Categories – 40 CFR Part 63, Subpart ZZZZ – Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines:  
If the compression ignition engine meets the requirements of 40 CFR Part 60 Subpart IIII, 40 CFR Part 63 Subpart ZZZZ requirements are also met. (40 CFR Part 63.6590(c))



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**J. Emission Units PF1.001a through PF1.001f**

System 10 – Fugitive Emissions from Equipment Components (Added – July 2025, Air Case 11992)		Location UTM (Zone 11, NAD 83)	
		m North	m East
PF1.001a	Valves – Gas Service	4,381,245	283,552
PF1.001b	Valves – Light Liquid Service	4,381,245	283,552
PF1.001c	Single Pump Seals	4,381,245	283,552
PF1.001d	Connectors	4,381,245	283,552
PF1.001e	Flanges	4,381,245	283,552
PF1.001f	Pressure Relief Valves and Sampling Connections	4,381,245	283,552

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **PF1.001a through PF1.001f, each**, have no add-on controls.
  
2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. Hours
    - (1) **PF1.001a through PF1.001f, each**, may operate a total of **24** hours per day.
  
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)
 

The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **PF1.001a through PF1.001f, combined**, the following pollutants in excess of the following specified limits:

  - a. The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed more than **25.0** tons per year.
  - b. The opacity from **PF1.001a through PF1.001f, each**, shall not equal or exceed **20** percent.
  
4. Monitoring and Recordkeeping (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)
 

The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

  - a. Monitor and record the hours of operation for **PF1.001a through PF1.001f, each**, on a monthly basis.
  - b. Perform quarterly inspections on the components of **PF1.001a through PF1.001f, each**, for any notable malfunction. The quarterly inspections can incorporate sight, sound, and smell.
  - c. Repair any component determined to malfunction, as determined from the inspections in 4.b. above.
  - d. Maintain records showing the date of the inspections, results of the inspections, dates of repair, and a description of the repairs performed on any component of **PF1.001a through PF1.001f**.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**K. Emission Unit S2.027**

System 11 – Emergency Flare (Added – July 2025, Air Case 11992)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.027	Emergency Flare for Process Emissions with 0.065 MMBtu/hr Pilot Light	4,381,311	283,416

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. **S2.027** has no add-on controls. **S2.027** shall be used to combust process emissions during **start-up, shutdown, malfunction (SSM)** events.
  - b. Descriptive Stack Parameters  
 Stack Height: 15.0 feet  
 Stack Diameter: 0.33 feet  
 Stack Temperature: 1,200 °F  
 Exhaust Flow: 100 actual cubic feet per minute (acfm)
  
2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. The maximum allowable **natural gas** consumption rate for **S2.027** shall not exceed **63.7 standard cubic feet (scf)** during pilot light operations.
  - b. The maximum allowable **process gases** (primarily methane) consumption rate for **S2.027** shall not exceed **3,000 standard cubic feet (scf)** during SSM events.
  - c. Hours
    - (1) **S2.027** may operate a total of **24** hours per day when using **natural gas** during pilot light operations.
    - (2) **S2.027** may operate a total of **1,080** hours per year when combusting **process gases** during SSM events.
  
3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)  
 The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from the flare stack of **S2.027** (combined pilot light operations and SSM events) the following pollutants in excess of the following specified limits:
  - a. The discharge of **PM** (particulate matter) to the atmosphere shall not exceed **0.023** pounds per hour, nor more than **0.014** tons per year.
  - b. The discharge of **PM<sub>10</sub>** (particulate matter less than or equal to 10 microns in diameter) to the atmosphere shall not exceed **0.023** pounds per hour, nor more than **0.014** tons per year.
  - c. The discharge of **PM<sub>2.5</sub>** (particulate matter less than or equal to 2.5 microns in diameter) to the atmosphere shall not exceed **0.023** pounds per hour, nor more than **0.014** tons per year.
  - d. The discharge of **SO<sub>2</sub>** (sulfur dioxide) to the atmosphere shall not exceed **0.0018** pounds per hour, nor more than **0.00097** ton per year.
  - e. The discharge of **NO<sub>x</sub>** (oxides of nitrogen) to the atmosphere shall not exceed **0.31** pounds per hour, nor more than **0.19** tons per year.
  - f. The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **0.26** pounds per hour, nor more than **0.16** tons per year.
  - g. The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.017** pounds per hour, nor more than **0.010** tons per year.
  - h. The opacity from the flare stack of **S2.027** shall not equal or exceed **20** percent.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**K. Emission Unit S2.027 (continued)**

4. Monitoring and Recordkeeping (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

- a. Monitor and record the total daily hours of operation for **S2.027** for each day of operation. The Permittee shall note which hours of operation are consuming **process gas during SSM events**, and which hours of operation are consuming **natural gas during pilot light operations**.
- b. Monitor and record the consumption rate of **natural gas during pilot light operations** on a daily basis for **S2.027** (in **scf**) by multiplying the maximum hourly fuel consumption rate as stated in **K.2.a** of this section and the total daily hours of operation.
- c. Monitor and record the consumption rate of **process gas during SSM events** on a daily basis for **S2.027** (in **scf**) by multiplying the maximum hourly fuel consumption rate as stated in **K.2.b** of this section and the total daily hours of operation.
- d. Monitor and record the total yearly hours of operation of **S2.027** per year for pilot light operations and SSM events. The annual hours of operation shall be determined at the end of each month as the sum of the monthly hours of operation for all previous months of that year.
- e. The presence of a flare pilot flame shall be monitored using a thermocouple or any equivalent device to detect the presence of a flame.
- f. Conduct and record an observation of visible emissions (excluding water vapor) on **S2.027** on a **monthly** basis while operating. The observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented to their back. If visible emissions are observed and exceed the applicable opacity standard, the Permittee shall take immediate corrective action. The Permittee shall maintain in a contemporaneous log with the following recordkeeping: the calendar date and time of any required monitoring, name of the observer, results of the monthly observation of visible emissions, and any corrective actions taken.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**L. Emission Units S2.028, S2.029, S2.030a, and S2.030b**

System 12 – Transloading of Naphtha and Sustainable Aviation Fuel (SAF) (Added – July 2025, Air Case 11992)		Location UTM (Zone 11, NAD 83)	
		m North	m East
S2.028	Truck/Rail Transloading – Naphtha	4,381,270	283,577
S2.029	Truck/Rail Transloading – SAF	4,381,270	283,577
S2.030a	0.063 MMBtu/hr Natural Gas Flare Pilot Light for Truck Loading	4,381,270	283,577
S2.030b	0.063 MMBtu/hr Natural Gas Flare Pilot Light for Rail Loading	4,381,270	283,577

1. Air Pollution Control Equipment (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. Volatile organic compound (VOC) emissions from **S2.028 and S2.029** shall be controlled by submerged fill with vapor balance.
  - b. NO<sub>x</sub> (oxides of nitrogen) emissions from **S2.028 and S2.029** shall be controlled by a **flare (S2.030a or S2.030b)**.
  - c. **S2.030a and S2.030b** shall have no add-on controls.
  - d. Descriptive Stack Parameters for Flare Exhaust Stacks S2.030a and S2.030b  
 Stack Height: 30.0 feet  
 Stack Diameter: 1.5 feet  
 Stack Temperature: 750 °F  
 Exhaust Flow: 25,000 actual cubic feet per minute (acfm)
  
2. Operating Parameters (NAC 445B.346(1)) (*Federally Enforceable SIP Requirement*)
  - a. The maximum allowable throughput for **S2.028 and S2.029, combined**, of **naphtha** shall not exceed **6,898,500.0** gallons per year.
  - b. The maximum allowable throughput for **S2.028 and S2.029, combined**, of **SAF** shall not exceed **39,091,500.0** gallons per year.
  - c. The maximum allowable heat input rate for **S2.030a and S2.030b, each**, during pilot (idling) and VOC vapor combustion operations shall not exceed **0.063** MMBtu per any one-hour period, combusting a maximum of **62.0** standard cubic feet (scf) per hour of natural gas. Pilot (idling) conditions are defined as the period when only the natural gas fired pilot light is operating.
  - d. Hours
    - (1) **S2.028, S2.029, S2.030a, and S2.030b**, each, may operate **24** hours per day.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**L. Emission Units S2.028, S2.029, S2.030a, and S2.030b (continued)**

3. Emission Limits (NAC 445B.305, NAC 445B.346(1), NAC 445B. 22017) (*Federally Enforceable SIP Requirement*)
  - a. The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.028 and S2.029, combined, when transloading naphtha into a truck or railcar**, the following pollutants in excess of the following specified limits:
    - (1) The discharge of **NO<sub>x</sub>** (oxides of nitrogen) to the atmosphere shall not exceed **0.026** pounds per hour, nor more than **0.12** tons per year.
    - (2) The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **0.066** pounds per hour, nor more than **0.29** tons per year.
    - (3) The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed more than **1.04** tons per year.
    - (4) The opacity from **S2.028 and S2.029, each**, shall not equal or exceed **20** percent.
  - b. The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from **S2.028 and S2.029, combined, when transloading SAF into a truck or railcar**, the following pollutants in excess of the following specified limits:
    - (1) The discharge of **NO<sub>x</sub>** (oxides of nitrogen) to the atmosphere shall not exceed **0.15** pounds per hour, nor more than **0.65** tons per year.
    - (2) The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **0.37** pounds per hour, nor more than **1.63** tons per year.
    - (3) The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed more than **0.49** tons per year.
    - (4) The opacity from **S2.028 and S2.029, each**, shall not equal or exceed **20** percent.
  - c. The Permittee, upon issuance of this operating permit, shall not discharge or cause the discharge into the atmosphere from the flare pilot lights for **S2.030a and S2.030b, each**, the following pollutants in excess of the following specified limits:
    - (1) The discharge of **NO<sub>x</sub>** (oxides of nitrogen) to the atmosphere shall not exceed **0.0043** pounds per hour, nor more than **0.019** tons per year.
    - (2) The discharge of **CO** (carbon monoxide) to the atmosphere shall not exceed **0.023** pounds per hour, nor more than **0.10** tons per year, combined.
    - (3) The discharge of **VOCs** (volatile organic compounds) to the atmosphere shall not exceed **0.0089** pounds per hour, nor more than **0.039** tons per year, combined.
    - (4) The opacity from **S2.030a and S2.030b** shall not equal or exceed **20** percent.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**L. Emission Units S2.028, S2.029, S2.030a, and S2.030b (continued)**

4. Monitoring and Recordkeeping (NAC 445B.346(2)) (*Federally Enforceable SIP Requirement*)

The Permittee, upon the issuance of this operating permit, shall maintain, in a contemporaneous log, the monitoring and recordkeeping specified in this section. All records in the log must be identified with the calendar date of the record. All specified records shall be entered into the log at the end of the shift, end of the day of operation, or the end of the final day of operation for the month, as appropriate.

- a. Monitor and record the hours of operation for **S2.028, S2.029, S2.030a, and S2.030b, each**, on a daily basis.
- b. Monitor and record the throughput of **naphtha**, in gallons, for **S2.028** on a monthly basis.
- c. Monitor and record the throughput of **SAF**, in gallons, for **S2.029** on a monthly basis.
- d. Monitor and record the consumption rate of **natural gas** on a daily basis for **S2.030a and S2.030b, each**, in scf.
- e. Monitor and record the total yearly throughput rate, in gallons per year, for **S2.028 and S2.029, each**. The annual throughput shall be determined at the end of each month as the sum of the monthly throughput rates for the year for all previous months of that year.
- f. The thermocouple or any other equivalent device to detect the presence of a flame during any flaring event shall be noted as detecting the pilot flame is on or off.
- g. Conduct and record an observation of visible emissions (excluding water vapor) on the exhaust stacks for **S2.030a and S2.030b** on a **monthly** basis while operating. The observer shall stand at a distance sufficient to provide a clear view of the emissions with the sun oriented to their back. If visible emissions are observed the Permittee shall take immediate corrective action. The Permittee shall maintain in a contemporaneous log the following recordkeeping: the calendar date of any required monitoring, results of the monthly observation of visible emissions, and any corrective actions taken.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

**Draft Permit No. AP2869-3847.01**

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**L. Emission Units S2.028, S2.029, S2.030a, and S2.030b (continued)**

5. Performance and Compliance Testing (NAC 445B.346(2)), (NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)  
The Permittee, upon issuance of this operating permit, shall conduct renewal performance testing for the **Truck Transloading Flare (S2.030a) and the Rail Transloading Flare (S2.030b) during normal operations**, at least 90 days prior to the expiration of this operating permit, but no earlier than 365 days from the date of expiration of this operating permit, and every 5 years thereafter, in accordance with the following:
- a. All opacity compliance demonstrations and/or performance tests must comply with the advance notification, protocol review, operational conditions, reporting, and other requirements of Section I.H. Testing and Sampling (NAC 445B.252) of this operating permit. All performance test results shall be based on the arithmetic average of three valid runs (NAC 445B.252(5)).
  - b. Testing shall be conducted on each flare exhaust stack (post controls).
  - c. Method 5 in Appendix A of 40 CFR Part 60 shall be used to determine PM emissions. The sample volume for each test run shall be at least 1.7 dscm (60 dscf). Test runs must be conducted for up to two hours in an effort to collect this minimum sample.
  - d. Method 201A and Method 202 in Appendix M of 40 CFR Part 51 shall be used to determine PM<sub>10</sub> and PM<sub>2.5</sub> emissions. The sample time and sample volume collected for each test run shall be sufficient to collect enough mass to weigh accurately.
  - e. The Method 201A and 202 test required in this section may be replaced by a Method 5 in Appendix A of 40 CFR Part 60 and Method 202 in Appendix M of 40 CFR Part 51 test. All particulate captured in the Method 5 and Method 202 test performed under this provision shall be considered PM<sub>2.5</sub> for determination of compliance.
  - f. Method 6C in Appendix A of 40 CFR Part 60 shall be used to determine the sulfur dioxide concentration. Each test will be run for a minimum of one hour.
  - g. Method 7E in Appendix A of 40 CFR Part 60 shall be used to determine the nitrogen oxides concentration. Each test will be run for a minimum of one hour.
  - h. Method 9 in Appendix A of 40 CFR Part 60 shall be used to determine opacity. Opacity observations shall be conducted concurrently with the applicable performance test. The minimum total time of observations shall be six minutes (24 consecutive observations recorded at 15 second intervals), unless otherwise specified by an applicable subpart.
  - i. Method 10 in Appendix A of 40 CFR Part 60 shall be used to determine the carbon monoxide concentration. Each test will be run for a minimum of one hour.
  - j. Method 25A in Appendix A of 40 CFR Part 60 shall be used to determine the volatile organic compound concentration. Method 18 in Appendix A of 40 CFR Part 60 or Method 320 in Appendix A of CFR Part 63 may be used in conjunction with Method 25A to break out the organic compounds that are not considered VOC's by definition per 40 CFR 51.100(s). Each Method 25A test will be run for a minimum of one hour.



**Bureau of Air Pollution Control**

**Facility ID No. A1107**

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**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section V. Specific Operating Conditions (continued)**

**L. Emission Units S2.028, S2.029, S2.030a, and S2.030b (continued)**

6. Federal Requirements (NAC 445B.346(2), NAC 445B.252(1)) (*Federally Enforceable SIP Requirement*)

a. New Source Performance Standards (NSPS) – 40 CFR Part 60.18, Subpart A, General Control Device Requirements

The Permittee shall meet all of the requirements in 40 CFR 60.18 for **S2.030a and S2.030b**:

- (1) Flares shall be designed for and operated with no visible emissions as determined by the methods specified in 40 CFR 60.18(f), except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. (40 CFR 60.18(c)(1))
- (2) Flares shall be operated with a flame present at all times, as determined by the methods specified in 40 CFR 60.18(f). (40 CFR 60.18(c)(2))
- (3) The Permittee has the choice of adhering to either the heat content specifications in 40 CFR 60.18(c)(3)(ii) and the maximum tip velocity specifications under 40 CFR 60.18(c)(4), or adhering to the requirements in 40 CFR 60.18(c)(3)(i). (40 CFR 60.18(c)(3))
- (4) Flares used to comply with 40 CFR 60.18 shall be steam-assisted, air-assisted, or non-assisted in accordance with 40 CFR 60.18(c)(4) and CFR 60.18(c)(5). (40 CFR 60.18(c)(6))
- (5) The Permittee shall monitor these control devices to ensure that they are operated and maintained in conformance with their designs. Applicable subparts will provide provisions stating how owners or operators of flares shall monitor these control devices. (40 CFR 60.18(d))
- (6) Flares used to comply with provisions of this subpart shall be operated at all times when emissions may be vented to them. (40 CFR 60.18(e))
- (7) Method 22 of appendix A to this part shall be used to determine the compliance of flares with the visible emission provisions of this subpart. The observation period is 2 hours and shall be used according to Method 22. (40 CFR 60.18(f)(1))
- (8) The presence of a flare pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. (40 CFR 60.18(f)(2))
- (9) The net heating value of the gas being combusted in a flare shall be calculated using the equation in 40 CFR 60.18(f)(3).
- (10) The actual exit velocity of a flare shall be determined in accordance with 40 CFR 60.18(f)(4).
- (11) The maximum permitted velocity,  $V_{max}$ , for flares shall be determined in accordance with 40 CFR 60.18(f)(5) or 40 CFR 60.18(f)(6), as appropriate.

**\*\*\*End of Specific Operating Conditions\*\*\***



**Bureau of Air Pollution Control**

*Facility ID No. A1107*

*Draft Permit No. AP2869-3847.01*

**CLASS II AIR QUALITY OPERATING PERMIT**

**Issued to:** NEW RISE RENEWABLES RENO – RENEWABLE NAPHTHA AND SAF PROCESSING PLANT (AS PERMITTEE)

**Section VI. Emission Caps**

A. Not Applicable

**\*\*\*\*End of Emission Caps\*\*\*\***



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**Section VII. Surface Area Disturbance Conditions**

The surface area disturbance for the **Renewable Naphtha and SAF Processing Plant** is **less than 1 acre**. Total site acreage is 10 acres.

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 4, 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. Except as otherwise provided in subsection 4, no person may disturb or cover 5 acres or more of land or its topsoil until he has obtained an operating permit for surface area disturbance to clear, excavate, or level the land or to deposit any foreign material to fill or cover the land.
4. The provisions of subsections 2 and 3 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.

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



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**Section VIII. Schedules of Compliance**

A. Not Applicable

**\*\*\*End of Schedule of Compliance\*\*\***



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**Section IX. Amendments**

**July XX, 2025 (Air Case # 11992)**

- System 1: Increase annual hours, increase fuel usage, increase emissions, revise stack parameters, change unit description.
- System 2: Increase annual hours, increase gpm flow rate, increase emissions, revise stack parameters, update info on CT.
- System 3: Increase annual hours, increase fuel usage (increase to 3 burners, each rated at 35.25 MMBtu/hr), increase emissions, revise stack parameters, add startup/shutdown/malfunction events.
- System 4A, System 4B: Revise generator descriptions, increase HP, revise emissions, revise stack parameters.
- System 5/5alt: Increase annual hours, revise fuel usage, revise emissions, revise em factors, revise stack parameters, add Isom Stripper gas.
- System 6: IA and permitted tanks reclassified, tank contents changed from diesel to naphtha or SAF(with Subpart Kb/Kc requirements).
- System 7: Increase annual hours, increase gpm flow rate, increase emissions, revise stack parameters, update info on CT.
- System 8A, System 8B, System 8C: Increase annual hours, revise fuel usage, revise emissions, revise stack parameters.
- System 9: Add two 350 HP fire pump engines.
- System 10: Add equipment components with VOC fugitive emissions (valves, pump seals, connectors, flanges).
- System 11: Add emergency flare for process emissions.
- System 12: Add naphtha and SAF products transloading operations.
- IA's include storage tanks that have been reclassified.

**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: February 13, 2023 .**  
**(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 operating 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: February 13, 2028**

**Signature:** \_\_\_\_\_

**Issued by:** XXXXXXXXXXXX  
Supervisor, Permitting Branch  
Bureau of Air Pollution Control

**Phone:** (775) 687-XXXX    **Date:** TBD

## Class II Insignificant Activities List

Appended to Permit #AP2869-3847.01

Emission Unit #	Emission Unit Description
IA1.001	<del>Naphtha Tank</del> (replaced by S2.031)
IA1.002	<del>Naphtha Tank</del> (replaced by S2.032)
IA1.003	<del>Diesel Tank #1</del> (replaced by S2.033)
IA1.004	<del>Diesel Tank #2</del> (replaced by S2.034)
IA1.005	<del>Diesel Tank #3</del> (replaced by S2.021)
IA1.006	<del>Biodiesel Tank #1</del> (replaced by S2.022)
IA1.007	<del>Biodiesel Tank #2</del> (replaced by S2.023)
IA1.008	<del>Biodiesel Tank #3</del> (replaced by S2.024)
IA1.009	500,000 Gallon Plant-Based Oil Storage Tank (Treated Feedstock) (previously S2.008)
IA1.010	1,000,000 Gallon Plant-Based Oil Storage Tank (Feedstock) (previously S2.012)