



**CLARK COUNTY • DEPARTMENT OF AIR QUALITY**  
4701 W. Russell Road Suite 200 • Las Vegas, NV 89118-2231  
(702) 455-5942 • Fax (702) 383-9994  
Lewis Wallenmeyer Director • Tina Gingras Assistant Director

September 12, 2012

CERTIFIED MAIL #91 7199 9991 7031 1245 7099

Jay A. Steinberg, President  
Nevada Environmental Response Trust  
35 East Wacker Drive, Suite 1550  
Chicago, Illinois 60601

E-mail: [bankruptcytrustee-receiver@lepetomaneintrustee.com](mailto:bankruptcytrustee-receiver@lepetomaneintrustee.com)

**Re: Veolia Water North America, 510 4<sup>th</sup> Street, Henderson, Nevada 89015 - Request For Information**

Dear Mr. Steinberg:

The purpose of this letter is to request information regarding the emissions associated with the operation of the perchlorate ground water remediation process operated by Veolia Water North America (Veolia) at 510 4<sup>th</sup> Street, Henderson, Nevada 89015.

Specifically, on August 15, 2012, personnel from Clark County's Department of Air Quality (Air Quality) were investigating the cause of odor complaints reported in and around the area of Veolia's operation. Air Quality personnel noted that the facility was not permitted by Air Quality, nor had the facility been reviewed by Air Quality for potential emissions of regulated air pollutants.

Pursuant to Section 12.1.1(c) of the Clark County Air Quality Regulations (AQR), a minor source means a stationary source that has a potential to emit equal to or greater than the following levels for any listed pollutant:

Type of Air Pollutant	Potential to Emit (tons/year)
PM <sub>10</sub>	5
CO	25
VOC	5
NO <sub>x</sub>	5
SO <sub>2</sub>	25
Lead (Pb)	0.3
H <sub>2</sub> S	1

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As provided for in Subsection 4.4 of the AQR, the Control Officer at any time may require from any person such information or analyses as will disclose the nature, extent, quantity or degree of air contaminants which are or may be discharged by such source, and type or nature of control equipment in use.

Air Quality personnel identified 15 areas at the Veolia facility where regulated air pollutants may be released to the ambient air. Therefore, you are hereby directed to submit a detailed written explanation describing each process below, the emission units (EUs) associated with each process and each EU's potential to emit (PTE) based on its maximum operational design. Please itemize the PTE data by providing the name of the emission unit(s), the emission factors utilized, the calculations explaining how the emissions were derived, and the results reported in tons/year.

1. Lift Stations
2. Equalization Basin
3. Fluidized Bed Reactors
4. Aeration Tank
5. Biofilters
6. Dissolved Air Flotation
7. Effluent Pump Skid
8. Sand Filter
9. Ultraviolet System
10. Effluent Booster Pumps
11. Solids Handling Facilities
12. Plant Air Compressors and Oxygen Generators
13. Groundwater Treatment Plant
14. Chemical Feed Systems
15. Process Control Targets

Additionally, all information submitted in response to this request must be certified as *true, accurate and complete by the Company's Responsible Official.*

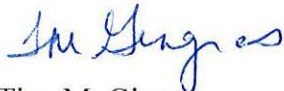
If in response to this information request, Veolia determines that the facility meets the requirements for an air quality permit under Section 12.1 of the AQR, Veolia may submit an air quality minor source permit application to Air Quality in lieu of a response to the information request. In either case, Veolia must respond by October 15, 2012. All documentation should be

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addressed to the Clark County Air Pollution Control Officer at 4701 W Russell Road, Las Vegas NV 89118-2231.

Should you have any questions regarding these matters, please contact Scott Jelinek at (702) 455-1680.

Sincerely,



Tina M. Gingras  
Control Officer

cc: Shibi Paul, Air Quality Supervisor, Compliance Division  
Gary Miller, Compliance and Enforcement Manager, Compliance Division  
Richard Beckstead, Permitting Manager  
Steve Kubacki, Veolia, [steve.kubacki@veoliawaterna.com](mailto:steve.kubacki@veoliawaterna.com)  
James Hutchens, Environ, [jlhutchens@environcorp.com](mailto:jlhutchens@environcorp.com)

TG:dc