

**ATTACHMENT TO THE STAFF REPORT  
DISTRICT BOARD OF HEALTH**

**Current Action  
Notice of Violation No. AQMV25-0011 Case  
No. 1548**

NORTHERN NEVADA PUBLIC HEALTH  
AIR QUALITY MANAGEMENT DIVISION  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

**NOTICE OF VIOLATION No: AQMV25-0011**  
**ISSUED TO**  
**STC Ventures, LLC**  
**Location: Wedge Pkwy. and Yellow Brick Rd.**  
**Permit Number: APCP24-0155**  
**Date of Issuance: May 29, 2025**  
**Case No.: 1548**

Northern Nevada Public Health Air Quality Management Division (AQMD) has determined that STC Ventures, LLC is in violation of the District Board of Health Regulations Governing Air Quality Management PART 040.030 DUST CONTROL.

1. VIOLATION

- A. Failure to comply with the provisions of Permit to Operate APCP24-0155. Specifically, Condition of Operation No. 1.:

VISIBLE EMISSION PROHIBITION: The owner and/or operator of a source engaging in dust generating activities shall not allow visible fugitive dust emissions for a period or periods accumulating more than 5 minutes in any hour. Washoe County District Board of Health Regulations Governing Air Quality Management. 040.030(C)(1).

2. BASIS OF VIOLATION

- A. Regulatory Authority  
The District Board of Health Regulations Governing Air Quality Management paragraph 040.030.C.1.:

VISIBLE EMISSIONS PROHIBITION: The owner and/or operator of a source engaging in dust generating activities shall not allow visible fugitive dust emissions for a period or periods accumulating more than 5 minutes in any hour.

This violation of the DBOH Regulations is the third violation of PART 040.030 within a 12-month period. Therefore, pursuant to DBOH Regulations Paragraph 020.100.A.3.c "...All minor violations become major violations upon the occurrence of the third violations of the same PART within a period of twelve (12) consecutive months."

- B. Facts to Constitute the Violation  
On January 31, 2025, the AQMD observed visible fugitive dust emissions originating from the Yellow Brick Road project site. Visible dust generated from unstable soil associated with

grading activity was blowing from the project site and impacting adjacent properties. A Method 22 fugitive dust observation was initiated. 11-minutes and 55-seconds of visible fugitive dust emissions were documented over a 15-minute observation period. In multiple areas of the site, the soil was observed to be dry, loose, and powdery due to recent grading activity. The site only had one water truck which was insufficient to control fugitive dust from the activities occurring.

3. APPEAL PROCEDURE AND TIME LIMITATIONS

A. Appeal Procedure

STC Ventures, LLC is advised that within (10) working days of receipt of this Notice of Violation, STC Ventures, LLC may submit a written petition for appeal to the Northern Nevada Public Health - Air Quality Hearing Board. The written petition for appeal shall be submitted to the AQMD at the following address:

Northern Nevada Public Health  
Air Quality Management Division  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

Failure to submit a petition for appeal within the specified timeframe will result in the submission of this Notice of Violation to the Northern Nevada Public Health - District Board of Health with a recommendation for the assessment of an administrative fine of \$10,000.00.

Date

5/29/2025

  
Joshua C. Restori  
Supervisor, Permitting and Compliance  
Air Quality Management Division  
Northern Nevada Public Health

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

Company Name STC Ventures, LLC  
Contact Name Ward Chilton  
Case Number 1548

I. Violation of Section 040.030.C.1 - Visible Emissions Prohibition

**I. Recommended Penalty** = \$ 10000.00

II. Violation of Section 0

**II. Recommended Penalty** = \$ 0.00

III. Violation of Section 0

**III. Recommended Penalty** = \$ 0.00

IV. Violation of Section 0

**IV. Recommended Penalty** = \$ 0.00

V. Violation of Section 0

**V. Recommended Penalty** = \$ 0.00

**Total Recommended Penalty** = \$ 10,000.00

  
\_\_\_\_\_  
Senior AQ Specialist/Supervisor

5/29/2025  
\_\_\_\_\_  
Date

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

Company Name STC Ventures, LLC  
Contact Name Ward Chilton  
Case Number 1548  
Violation Number AQMV25-0011  
  
Violation of Section 040.030.C.1 - Visible Emissions Prohibition  
Permit Condition Condition of Operation 1.

I. **Base Penalty as specified in the Penalty Table** = \$ **2,500.00**

II. **Severity of Violation**

A. **Public Health Impact**

1. **Toxicity of Release** (For Emissions Exceedances)

Unable to Quantify - 1x      Criteria Pollutant - 1x      Hazardous Air Pollutant - 2x  
Adjustment Factor **1**

Comment: Criteria Pollutant (PM)

2. **Environmental/Public Health Risk** (Proximity to sensitive environment or group)

Negligible - 1x    Moderate - 1.5x    Significant - 2x      Adjustment Factor **1.0**

Comment: Negligible

Total Adjustment Factors (1 x 2) = **1**

B. **Adjusted Base Penalty**

Base Penalty \$ 2,500.00 x Adjustment Factor 1 = \$ **2,500.00**

C. **Number of Days/Weeks/Months or Units in Violation**

Adjusted Penalty \$ 2,500.00 x Number of Days/Weeks/Months **1** = \$ **2,500.00**

Comment: One day of observation exceeding emissions limitations

D. **Economic Benefit**

Avoided Costs \$ **0.00** + Delayed Costs \$ **0.00** = \$ 0.00

Comment: No economic benefit was added to the penalty

**Penalty Subtotal**

Adjusted Base Penalty \$ 2,500.00 + Economic Benefit \$ 0.00 = \$ **2,500.00**

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

**III. Penalty Adjustment Consideration**

**A. Mitigating Factors** (0 +/- 25%)

0%

Comment: None

**B. Compliance History**

Similar Violation < 12 months (300%)

+ 300%

Similar Violation < 3 years (200%)

+

Similar Violation > 3 years (150%)

+

Previous Unrelated Violations < 5 years

5%

x

0

, # of previous violations

+ 0%

Comment: None

**Total Penalty Adjustment Factors** – Sum of A & B

300%

**IV. Recommended Penalty**

Penalty Adjustment:

\$ 2,500.00	x	300%	= \$ 7,500.00
Penalty Subtotal (From Section II)		Total Adjustment Factors (From Section III)	Total Adjustment Value

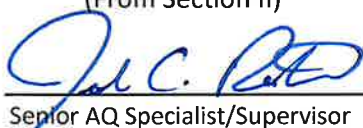
Additional Credit for Environmental Investment/Training

- \$

Comment: \_\_\_\_\_

Adjusted Penalty:

\$ 2,500.00	+/-	\$ 7,500.00	=	\$ 10,000.00
Penalty Subtotal (From Section II)		Total Adjustment Value (From Section III + Credit)		Recommended Penalty

  
Senior AQ Specialist/Supervisor

5/29/2025  
Date



June 30, 2025

Dear Joshua Restori:

The following is in response to your request for proof of delivery on your item with the tracking number:  
**9489 0090 0027 6501 2444 68.**

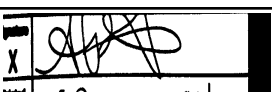
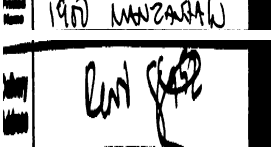
#### Item Details

<b>Status:</b>	Delivered, Individual Picked Up at Postal Facility
<b>Status Date / Time:</b>	June 6, 2025, 9:02 am
<b>Location:</b>	RENO, NV 89510
<b>Postal Product:</b>	First-Class Mail®
<b>Extra Services:</b>	Certified Mail™
	Return Receipt Electronic

#### Shipment Details

<b>Weight:</b>	5lb, 0.3oz
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#### Recipient Signature

Signature of Recipient:	
Address of Recipient:	

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,  
United States Postal Service®  
475 L'Enfant Plaza SW  
Washington, D.C. 20260-0004

## MEMORANDUM OF UNDERSTANDING

NORTHERN NEVADA PUBLIC HEALTH  
AIR QUALITY MANAGEMENT DIVISION

Date: May 29, 2025

Company Name: STC Ventures, LLC

Address: 1900 Manzanita Lane Reno, Nevada 89509

Case No. 1548 Notice of Violation No.(s) AQMV25-0011

The staff of the Northern Nevada Public Health, Air Quality Management Division issued the above referenced citation for the violation of Regulation: 040.030.C.1 Dust Control - Allowing visible fugitive dust emissions for period or periods accumulating more than 5 minutes in any hour.

A settlement of this matter has been negotiated between the undersigned parties resulting in a penalty amount of \$ 9,000.00. This settlement will be submitted to the District Board of Health for review at the regularly scheduled meeting on July 24, 2025

The undersigned agrees to waive an appeal to the Air Pollution Control Hearing Board so this matter may be submitted directly to the District Board of Health for consideration.



Signature of Company Representative

WARD CHILTON

Print Name

MANAGER, STC VENTURES, LLC

Title

Witness



Signature of District Representative

Joshua C. Restori

Print Name

Air Quality Supervisor

Title



Witness

**ATTACHMENT TO THE STAFF REPORT  
DISTRICT BOARD OF HEALTH**

**Washoe County District Board of Health Regulations  
020.040 Civil Fines and Penalties and Administrative  
Fine Assessment**

# **CHAPTER 020 - GENERAL PROVISIONS**

## **PART 020.100 - VIOLATIONS OF REGULATIONS AND PENALTIES**

### **SECTION A - VIOLATION OF REGULATIONS AND PENALTIES**

#### **1. VIOLATION OF REGULATIONS**

- a. In determining whether a violation of these regulations has been committed, whether the violation was intentional or inadvertent is immaterial and does not constitute cause for dismissal of the case by the Hearing Board or District Board of Health. However, either board may consider whether the violation was intentional or inadvertent in determining the amount of the penalty to be imposed.

#### **2. NOTICE OF VIOLATION**

- a. Whenever the Control Officer or their authorized agent or representative has a reasonable cause to believe that any section of these regulations for the prevention, abatement or control of air pollution has been violated, the Control Officer shall cause written notice to be served upon the person or persons responsible for the alleged violations.
- b. The notice shall specify:
  - (1) The section or sections of these regulations alleged to be violated.
  - (2) The facts alleged to constitute the violation.
  - (3) Appeal procedure including any time limitations.
- c. The notice may include an order to take corrective action within a reasonable time, which shall be specified. Such an order becomes final unless, within ten (10) working days after service of the notice, a person named in the order requests a hearing before the Hearing Board.
- d. With or without the issuance of an order pursuant to paragraph 020.100.A.2.c:
  - (1) The Control Officer or their authorized agent or representative may notify the person or persons responsible for the alleged violation to appear before the Hearing Board at a specified time and place; or
  - (2) The Hearing Board may initiate proceedings for recovery of the appropriate penalty set forth in paragraph 020.100.A.3.
- e. Nothing in this section prevents the Hearing Board or the Control Officer or their authorized agent or representative from making efforts to obtain voluntary compliance through warning, conference, or other appropriate means.

#### **3. CIVIL FINES AND PENALTIES**

- a. Except as provided in paragraphs 020.100.A.3.b. and c., a violation of any section of these regulations constitutes a major violation. Failure to comply with any condition of an operating permit constitutes a violation.
- b. Any person who commits a major violation of any section of these regulations, other than paragraph 020.100.A.5. and SECTION 020.000.D., is guilty of a civil offense and may be required to pay an administrative fine of not more than \$10,000.00 per day, per violation. Each day of violation constitutes a separate offense. The District Board of Health may establish a compliance schedule as a part of any civil

finding either in lieu of, or in addition to, monetary penalties. Any fines assessed may be held in abeyance pending fulfillment of any compliance schedule.

- c. Violations of PARTS 040.030 (Dust Control), 040.035 (Open Burning), 040.040 (Fire Set for Training), 040.050 (Incinerator Emission), 040.051 (Wood-Burning Devices), 040.055 (Odorous Emissions), 040.080 (Gasoline Transfer and Dispensing Facilities), 040.200 (Diesel Engine Idling) or 050.001 (Emergency Episode Plan) of these regulations constitutes a minor violation unless there are three or more violations of any one of those PARTS by a person or entity, occurring within a period of twelve (12) consecutive months. All minor violations become major violations upon the occurrence of the third violation of the same PART within a period of twelve (12) consecutive months.

- (1) The first offense of a minor violation shall result in an administrative fine of \$500.
- (2) The second offense of a minor violation shall result in an administrative fine of \$1,000.
- (3) Administrative non-compliance of the PARTS described in this paragraph (i.e. incomplete Dust Log, on site permit missing) shall constitute a warning. Any further administrative non-compliance with conditions of the PARTS described in this paragraph may constitute a violation.

- d. Administrative fines shall be levied by appropriate action of the District Board of Health and recorded in its official minutes. The evidence or information on which the District Board of Health bases its action may include any one or more of the following:

- (1) The recommendation of the Control Officer, or their authorized agent or representative, based on any Notice of Violation served on any person in accordance with these regulations if that person has not appeared or requested a hearing before the Hearing Board.
- (2) The recommendation of the Hearing Board, based on its findings in connection with any appeal or other matter referred to the District Board of Health in accordance with these regulations.
- (3) Evidence presented before the District Board of Health by any person, public official, or representative of the District Board of Health, provided the person charged with violating any of these regulations has received reasonable notice (at least twenty (20) calendar days in advance) of the hearing at which such evidence is to be presented and is provided an opportunity to present evidence in his defense at the hearing.

- e. Unless the District Board of Health bases its decision on the recommendations and/or findings of the Control Officer, their authorized agent or representative, or the Hearing Board as set forth in paragraphs 020.000.A.3.d.(1) and (2), the District Board of Health shall base its decision as to whether a violation of these regulations has occurred on the evidence presented before the District Board of Health pursuant to paragraph 020.100.A.3.d.(3). Irrelevant, immaterial, or unduly repetitious evidence shall be excluded. Documentary evidence may be received in the form of authenticated copies or excerpts if the original is not readily available and, on request, parties shall be given an opportunity to compare the copy with the original. Each party may call and examine witnesses, introduce exhibits, cross-examine opposing witnesses on any matter relevant to the issues even though such matter was not covered in the direct examination, impeach any witness regardless of which party first was called to testify and rebut the evidence against them. The District Board of Health may take notice of judicially cognizable facts and/or recognized technical or scientific facts within the District Board of Health's specialized knowledge. All decisions of the District Board of Health respecting administrative fines shall be in writing or notice of the District Board of Health's decision shall be forwarded to the aggrieved party at their last known mailing address.

- f. In those cases where it is determined by the District Board of Health that a violation of the Regulations has occurred, the District Board of Health, at its discretion, may choose to waive the fine for a first violation, levy any fine providing it does not exceed the appropriate range limitation, require use of other mitigation methods or schedules of compliance and, in emergency situations, require a stop work order to be issued and/or any other combination of remedies to bring about compliance with the regulations.

- g. All administrative fines collected by the District Board of Health pursuant to this section shall be deposited

in the school district fund of Washoe County.

- h. All monetary fines assessed pursuant to violations of PARTS 030.105 or 030.107 for improper asbestos containing material removal, shall be for an amount greater than the estimated savings obtained by the illegal removal.

#### 4. INJUNCTIVE RELIEF

- a. In addition to any remedy at law hereunder, the Control Officer may apply to a court of competent jurisdiction for any other equitable and injunctive relief to enforce compliance with, or to restrain violation of any provisions of these regulations or to any regulation or rule made and adopted pursuant thereto.

#### 5. INTERFERENCE WITH PERFORMANCE OF DUTY

- a. No person shall refuse entry or access to any authorized representative of the District Board of Health, upon presentation of appropriate credential, who requests entry to inspect any property, premises or place on or at which an air contaminant source is located or is being constructed, installed or established at any reasonable time for the purpose of ascertaining the state of compliance with these regulations. No person shall obstruct, hamper or interfere with any such inspection. If entry is refused, or prior to attempting to enter, such officer may apply to any magistrate for a search warrant. The magistrate shall issue the warrant if he believes from the supporting affidavit or affidavits that there is probable cause to believe that a source of air contaminant exists or is being constructed or operated on the premises to be searched.

**ATTACHMENT TO THE STAFF REPORT  
DISTRICT BOARD OF HEALTH**

**Previous Action  
Notice of Violation No. AQMV24-0015  
Case No. 1491**

NORTHERN NEVADA PUBLIC HEALTH  
AIR QUALITY MANAGEMENT DIVISION  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

## NOTICE OF VIOLATION No: AQMV24-0015

### ISSUED TO

STC Ventures, LLC

Location: Wedge Pkwy., Reno, NV 89511

APN: 144-070-26, 049-450-16, 049-450-57

Permit Number: APCP23-0068

Date of Issuance: March 26, 2024

Case No.: 1491

Northern Nevada Public Health Air Quality Management Division (AQMD) has determined that STC Ventures, LLC is in violation of the District Board of Health Regulations Governing Air Quality Management PART 040.030 DUST CONTROL.

#### 1. VIOLATION

- A. Failure to comply with the provisions of Permit to Operate APCP23-0068. Specifically, Condition of Operation No. 1.:

**VISIBLE EMISSION PROHIBITION:** The owner and/or operator of a source engaging in dust generating activities shall not allow visible fugitive dust emissions for a period or periods accumulating more than 5 minutes in any hour. Washoe County District Board of Health Regulations Governing Air Quality Management. 040.030(C)(1).

#### 2. BASIS OF VIOLATION

- A. Regulatory Authority

The District Board of Health Regulations Governing Air Quality Management paragraph 040.030.C.1.:

**VISIBLE EMISSIONS PROHIBITION:** The owner and/or operator of a source engaging in dust generating activities shall not allow visible fugitive dust emissions for a period or periods accumulating more than 5 minutes in any hour.

- B. Facts to Constitute the Violation

On February 27, 2024, the AQMD sent a courtesy notice to all Dust Control Permit holders in Washoe County concerning high winds forecast for February 29, 2024.

On February 29, 2024, a Senior Air Quality Specialist of the AQMD observed and documented over 5 minutes of visible fugitive dust from stockpiles and construction equipment operations on the Yellow Brick Road Project site via EPA Reference Method 22.

3. APPEAL PROCEDURE AND TIME LIMITATIONS

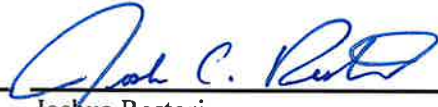
A. Appeal Procedure

STC Ventures, LLC is advised that within (10) working days of the receipt of this Notice of Violation, STC Ventures, LLC may submit a written petition for appeal to the Northern Nevada Public Health - Air Quality Hearing Board. The written petition for appeal shall be submitted to the AQMD at the following address:

Northern Nevada Public Health  
Air Quality Management Division  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

Failure to submit a petition for appeal within the specified timeframe will result in the submission of this Notice of Violation to the Northern Nevada Public Health - District Board of Health with a recommendation for the assessment of an administrative fine of \$500.00.

3/26/2024  
Date

  
Joshua Restori  
Supervisor, Permitting and Compliance  
Northern Nevada Public Health  
Air Quality Management Division

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

Company Name STC Ventures, LLC  
Contact Name Ward Chilton  
Case Number 1491

I. Violation of Section 040.030.C.1 VISIBLE EMISSIONS PROHIBITION

I. Recommended Penalty = \$ 500.00

II. Violation of Section 0

II. Recommended Penalty = \$ 0.00

III. Violation of Section 0

III. Recommended Penalty = \$ 0.00

IV. Violation of Section 0

IV. Recommended Penalty = \$ 0.00

V. Violation of Section 0

V. Recommended Penalty = \$ 0.00

**Total Recommended Penalty** = \$ 500.00

  
Senior AQ Specialist/Supervisor

3/26/2024  
Date

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

Company Name STC Ventures, LLC  
Contact Name Ward Chilton  
Case Number 1491  
Violation Number AQMV24-0015

Violation of Section 040.030.C.1 VISIBLE EMISSIONS PROHIBITION  
Permit Condition Condition of Operation No. 1

**I. Base Penalty as specified in the Penalty Table** = \$ **500.00**

**II. Severity of Violation**

**A. Public Health Impact**

**1. Toxicity of Release** (For Emissions Exceedances)

Unable to Quantify - 1x      Criteria Pollutant - 1x      Hazardous Air Pollutant - 2x  
Adjustment Factor **1**

Comment: Penalty by Rule

**2. Environmental/Public Health Risk** (Proximity to sensitive environment or group)

Negligible - 1x   Moderate - 1.5x   Significant - 2x      Adjustment Factor

Comment: Penalty by Rule

Total Adjustment Factors (1 x 2) = **1**

**B. Adjusted Base Penalty**

Base Penalty \$ 500.00 x Adjustment Factor 1 = \$ **500.00**

**C. Number of Days/Weeks/Months or Units in Violation**

Adjusted Penalty \$ 500.00 x Number of Days/Weeks/Months **1** = \$ **500.00**

Comment: Penalty by Rule

**D. Economic Benefit**

Avoided Costs \$ **0.00** + Delayed Costs \$ **0.00** = \$ 0.00

Comment: Penalty by Rule

**Penalty Subtotal**

Adjusted Base Penalty \$ 500.00 + Economic Benefit \$ 0.00 = \$ **500.00**

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

**III. Penalty Adjustment Consideration**

**A. Mitigating Factors** (0 +/- 25%)

**Comment** Penalty by Rule

**B. Compliance History**

Similar Violation < 12 months (300%)

+

Similar Violation < 3 years (200%)

+

Similar Violation > 3 years (150%)

+

Previous Unrelated Violations < 5 years

5%

 x , # of previous violations

+ 0%

**Comment:** Penalty by Rule

**Total Penalty Adjustment Factors** – Sum of A & B

**0%**

**IV. Recommended Penalty**

Penalty Adjustment:

\$ 500.00 x 0% = \$ **0.00**

Penalty Subtotal

Total Adjustment Factors

Total Adjustment

(From Section II)

(From Section III)

Value

Additional Credit for Environmental Investment/Training

- \$

**Comment:** \_\_\_\_\_

Adjusted Penalty:

\$ 500.00 +/- \$ 0.00 = \$ **500.00**

Penalty Subtotal

Total Adjustment Value

Recommended Penalty

(From Section II)

(From Section III + Credit)

*John C. Rosta*  
Senior AQ Specialist/Supervisor

3/26/2024  
Date

**ATTACHMENT TO THE STAFF REPORT  
DISTRICT BOARD OF HEALTH**

**Previous Action  
Notice of Violation No. AQMV24-0018  
Case No. 1509**

NORTHERN NEVADA PUBLIC HEALTH  
AIR QUALITY MANAGEMENT DIVISION  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

## NOTICE OF VIOLATION No: AQMV24-0018 ISSUED TO

STC Ventures, LLC  
Location: Wedge Pkwy., Reno, NV 89511  
APN: 144-070-26, 049-450-16, 049-450-57  
Permit Number: APCP23-0068  
Date of Issuance: June 12, 2024  
Case No.: 1509

Northern Nevada Public Health Air Quality Management Division (AQMD) has determined that STC Ventures, LLC is in violation of the District Board of Health Regulations Governing Air Quality Management PART 040.030 DUST CONTROL.

### 1. VIOLATION

- A. Failure to obtain a Dust Control Permit prior to commencement of a dust generating activity (1) acre or greater.

### 2. BASIS OF VIOLATION

- A. Regulatory Authority  
The District Board of Health Regulations Governing Air Quality Management paragraph 040.030.C.3. - DUST CONTROL PERMIT REQUIREMENTS:

The owner and/or operator of a dust generating activity shall apply for and obtain a Dust Control Permit prior to commencement of the dust generating activity. In the Dust Control Permit application, the owner and/or operator shall designate a person responsible for compliance with the "District Board of Health Regulations Governing Air Quality Management." Failure to comply with the provisions of an approved Dust Control Permit shall be deemed a violation of this Rule.

- B. Facts to Constitute the Violation  
On April 5, 2024 representatives of the AQMD conducted an air quality evaluation of the Yellow Brick Road project covered by Dust Control Permit No. APCP23-0068. During the evaluation the AQMD determined that dust generating activities were occurring outside the acreage covered by the Dust Control Permit. The AQMD advised that all activities in the in the unpermitted acreage must cease. The AQMD advised that an updated application must be submitted to the AQMD to add the additional acreage to Dust Control Permit No. APCP23-0068.

On April 10, 2024 a Dust Control Permit Modification form was submitted to the AQMD to increase the acreage for the Yellow Brick Road project.

On April 16, 2024 the AQMD updated Dust Control Permit No. APCP23-0068 to include the additional acreage on the Yellow Brick Road project.

3. APPEAL PROCEDURE AND TIME LIMITATIONS

A. Appeal Procedure

STC Ventures, LLC is advised that within (10) working days of the receipt of this Notice of Violation, STC Ventures, LLC may submit a written petition for appeal to the Northern Nevada Public Health - Air Quality Hearing Board. The written petition for appeal shall be submitted to the AQMD at the following address:

Northern Nevada Public Health  
Air Quality Management Division  
1001 East Ninth Street Suite B171  
Reno, Nevada 89512

Failure to submit a petition for appeal within the specified timeframe will result in the submission of this Notice of Violation to the Northern Nevada Public Health - District Board of Health with a recommendation for the assessment of an administrative fine of \$1000.00.

6/13/24  
Date

  
\_\_\_\_\_  
Jeff Jeppson  
Senior Air Quality Specialist, AQMD  
Northern Nevada Public Health

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

Company Name STC Ventures, LLC  
Contact Name Ward Chilton  
Case Number 1509

I. Violation of Section 040.030.C.3 - DUST CONTROL PERMIT REQUIREMENTS

I. Recommended Penalty = \$ 1000.00

II. Violation of Section 0

II. Recommended Penalty = \$ 0.00

III. Violation of Section 0

III. Recommended Penalty = \$ 0.00


IV. Violation of Section 0

IV. Recommended Penalty = \$ 0.00

V. Violation of Section 0

V. Recommended Penalty = \$ 0.00

**Total Recommended Penalty = \$ 1,000.00**

  
\_\_\_\_\_  
Senior AQ Specialist/Supervisor

6/13/24  
\_\_\_\_\_  
Date

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

Company Name	STC Ventures, LLC
Contact Name	Ward Chilton
Case Number	1509
Violation Number	AQMV24-0018
Violation of Section	040.030.C.3 - DUST CONTROL PERMIT REQUIREMENTS
Permit Condition	N/A

I. Base Penalty as specified in the Penalty Table = \$ **1,000.00**

II. Severity of Violation

A. Public Health Impact

1. Toxicity of Release (For Emissions Exceedances)

Unable to Quantify - 1x      Criteria Pollutant - 1x      Hazardous Air Pollutant - 2x

Adjustment Factor **1**

Comment: Penalty by Rule

2. Environmental/Public Health Risk (Proximity to sensitive environment or group)

Negligible - 1x   Moderate - 1.5x   Significant - 2x

Adjustment Factor **1.0**

Comment: Penalty by Rule

Total Adjustment Factors (1 x 2) = **1**

B. Adjusted Base Penalty

Base Penalty \$ 1,000.00 x Adjustment Factor 1 = \$ **1,000.00**

C. Number of Days/Weeks/Months or Units in Violation

Adjusted Penalty \$ 1,000.00 x Number of Days/Weeks/Mo **1** = \$ **1,000.00**

Comment: Penalty by Rule

D. Economic Benefit

Avoided Costs \$ **0.00** + Delayed Costs \$ **0.00** = \$ 0.00

Comment: Penalty by Rule

**Penalty Subtotal**

Adjusted Base Penalty \$ 1,000.00 + Economic Benefit \$ 0.00 = \$ **1,000.00**

**Northern Nevada Public Health  
Air Quality Management Division  
Recommended Penalty Calculation Worksheet**

**III. Penalty Adjustment Consideration**

**A. Mitigating Factors** (0 +/- 25%)

0%

Comment: \_\_\_\_\_

**B. Compliance History**

Similar Violation < 12 months (300%)

+

0%

Similar Violation < 3 years (200%)

+

0%

Similar Violation > 3 years (150%)

+

0%

Previous Unrelated Violations < 5 years

5%

x

\_\_\_\_\_

, # of previous violations

+

0%

Comment: \_\_\_\_\_

**Total Penalty Adjustment Factors** – Sum of A & B

0%

**IV. Recommended Penalty**

Penalty Adjustment:

\$ 1,000.00

x

0%

= \$

0.00

Penalty Subtotal

Total Adjustment Factors

Total Adjustment

(From Section II)

(From Section III)

Value

Additional Credit for Environmental Investment/Training

-

\$

0.00

Comment: \_\_\_\_\_

Adjusted Penalty:

\$ 1,000.00

+/-

\$ 0.00

=

\$

1,000.00

Penalty Subtotal

Total Adjustment Value

Recommended Penalty

(From Section II)

(From Section III + Credit)

\_\_\_\_\_  
Senior AQ Specialist/Supervisor

\_\_\_\_\_  
Date

6/13/24