



Dust Control Operating Permit (DCOP) For Construction Activities

This permit does not exempt the permittee from compliance with the Endangered Species Act

Permit No: 60160

Version No: 0

Permittee: Leading Edge Ventures LLC.

Project: Vegas/Nellis Truck Parking Yard (60160)

Physical Location: 4140 North Nellis Las Vegas, NV 89191

Cross Streets: Las Vegas Blvd/Nellis Blvd, SE

Effective Date: Jul 9, 2026

Expiration Date: Jul 8, 2027

Revision Date: N/A

Revision Type: N/A

Project Acreage: 2.8

Region: ENE - East/Northeast

Notes/Additional Permit Conditions

CONDITIONAL RENEWAL FOR 2027 PER SECTION 92: Alternative Asphalt is approved. Alternative Asphalt must be applied and maintained in accordance with section 92 and DAQ's Guidance document.

Designated Onsite Representative

Name: Robert Lauer
Company: Leading Edge Ventures LLC.
Mobile Number: 702-271-4436
Email: roblauer@pm.me
Dust Card No.: SCHEDULED Expires: Apr 28, 2026

Responsible Official

Name: Robert Lauer
Company: Leading Edge Ventures LLC.
Office Number: 702-271-4436
Mobile Number: 702-271-4436
Email: roblauer@pm.me

Dust control measures must occur 24 hours a day, 7 days a week.

This permit is not valid until all fees are paid in full and a complete copy of the permit with conditions and the dust mitigation plan is posted on the project site.

It is a condition of the issuance of any operating permit required by the commission or pursuant to any local ordinance for the control of air pollution that the holder of the operating permit agrees to permit inspection of the premises to which the permit relates by authorized officer of the department at any time during the holder's hours of operation without prior notice. This condition must be stated on each application form and operating permit. NRS 445B.580.

The issuance of this PERMIT does not relieve the PERMITTEE from compliance with all other applicable federal, state, county and local ordinances and regulations. Issuance of this PERMIT shall not be a defense to violations of any applicable ordinances or regulations.

Permittee Information

Permittee Name: Leading Edge Ventures LLC.

Mailing Address: 850 East Desert Inn

City/State/Zip Code: Las Vegas, NV 89109

Office Number: 702-271-4436

Fax Number:

Additional Project Information

Project Description: Outdoor truck staging and storage yard

Project Attributes: Commercial Construction

Portable Crushing and/or Powered Screening: *Portable crushing and/or powered screening equipment supporting any onsite single construction activity and remaining onsite for less than 12 months is exempt from the stationary source permitting requirements of AQR Section 12.1 and will instead be subject to the conditions of the Dust Control Operating Permit issued pursuant to AQR Section 94. This exemption does not apply to equipment listed as emission units in a current minor source permit unless the permit states otherwise.*

- Will portable crushing or powered screening occur onsite: No
- If yes, what is the anticipated date that equipment will be brought onsite: N/A
- What is the duration equipment will remain onsite: N/A

Dust Control Monitor Information

Name: N/A

Company: N/A

Mobile Number: N/A

Email: N/A

Dust Monitor Card No.: Expires:

Blasting Supplemental Information

Blasting Company: N/A

Contact Name: N/A

Mailing Address: N/A

Office Number: N/A

Mobile Number: N/A

Blasting Date: N/A **Blasting Time:** N/A

Blasting Frequency: N/A

Material to be Blasted: N/A

Acreage to be Blasted: N/A

Blasting Depth: N/A Feet

Distance to Nearest Residence: N/A Feet

Distance to Nearest Business: N/A Feet

Have Nearby Residents Been Informed: N/A

Have Nearby Businesses Been Informed: N/A

Responsible Official Certification/Acknowledgement Statement

By submitting this permit application electronically, the user (Responsible Official) certifies the following:

- a. As the Responsible Official (applicant), I am authorized on behalf of the Owner Builder/Company/Organization (permittee) to apply for this DCOP and to commit to all of the terms and conditions therein.
- b. If applying on behalf of the permittee listed, the permittee shall be responsible for complying with requirements of this DCOP and the Air Quality Regulations (AQRs). Otherwise, the applicant listed shall be the responsible party.
- c. I accept responsibility for assuring that all contractors, subcontractors, and other persons on the construction site defined by this permit comply with the terms and conditions of the DCOP, the associated Dust Mitigation Plan and the AQRs.

By submitting this permit application electronically, the user (Responsible Official) acknowledges the following:

- a. The permit issued in response to this application is not a substitute for obtaining the property owner's permission to use land associated with the project. Issuance of the DCOP is intended only for controlling the emission of air pollutants and assuring compliance with the AQRs. Clark County cannot be held liable for any unauthorized use of the land.
- b. In accordance with the DCOP and the AQRs, the applicant and the permittee shall consent to inspection of the site during normal hours of operation by Division of Air Quality (DAQ) staff without prior notice to determine compliance with the terms and conditions of the DCOP and the AQRs.

Additional Instructions/Advisories

- a. Before disturbing soils on a parcel, enacting a grade change, constructing a structure and/or appurtenances, or installing, constructing, or modifying equipment that emits an air pollutant, you must contact and obtain all required permits from Clark County's Department of Comprehensive Planning, Building Department, DAQ (Title 30 Notice) and the municipality with jurisdiction.
- b. If the project has 50 or more acres of disturbed soil at any given time, the permittee shall identify the on-site Dust Control Monitor for the project(s). In addition, this requirement applies when the permittee has common control of multiple adjacent projects that individually have less than 50 acres of disturbed soil at any given time, but the combined project has 50 or more acres of disturbed soil at any given time.
If a Dust Control Monitor had not been identified at the time of this permit issuance, the permittee shall notify DAQ by revising the permit in the DAQ Permitting Portal, before disturbing 50 or more acres of soil at any given time. The Dust Control Monitor must be on-site at all times when construction activities occur and shall manage dust prevention and control on-site.
- c. DCOP acreage fee is based on total project acreage of disturbed surface area, which is rounded up to the next whole acre. If the project is less than 1 acre, a minimum of 1 acre shall apply to the project for fee purposes.
- d. Stormwater Advisory: Be advised that all land disturbances 1 acre or more, or less than 1 acre but part of a larger common plan for development or sale that will ultimately disturb 1 acre or more, must submit a "Notice of Intent" to the Nevada Division of Environmental Protection that certifies a Storm Water Pollution Prevention Plan has been developed and is maintained for the site. Contact NDEP at (775) 687-9429 for an application, information, and instructions.

Dust Mitigation Plan

Parcel Number: 140-04-401-003

Soil PEP: High

Water Source: Hydrant with Jones Valve

If other, describe:

Water Application Method: Water Trucks/Pulls

If other, describe:

Best Management Practices (BMPs) – Control Measures

The permittee shall comply with all requirements of Section 94 of the AQRs and all provisions of the DCOP issued from this application.

For each project activity listed in this Dust Mitigation Plan, the permittee shall comply with the requirements for the associated Best Management Practices (BMPs). Where options are listed for a BMP requirement, the permittee shall apply one or more of the control measures to comply with the requirement. The permittee will apply corresponding control measures for the PEP for the project soil type(s).

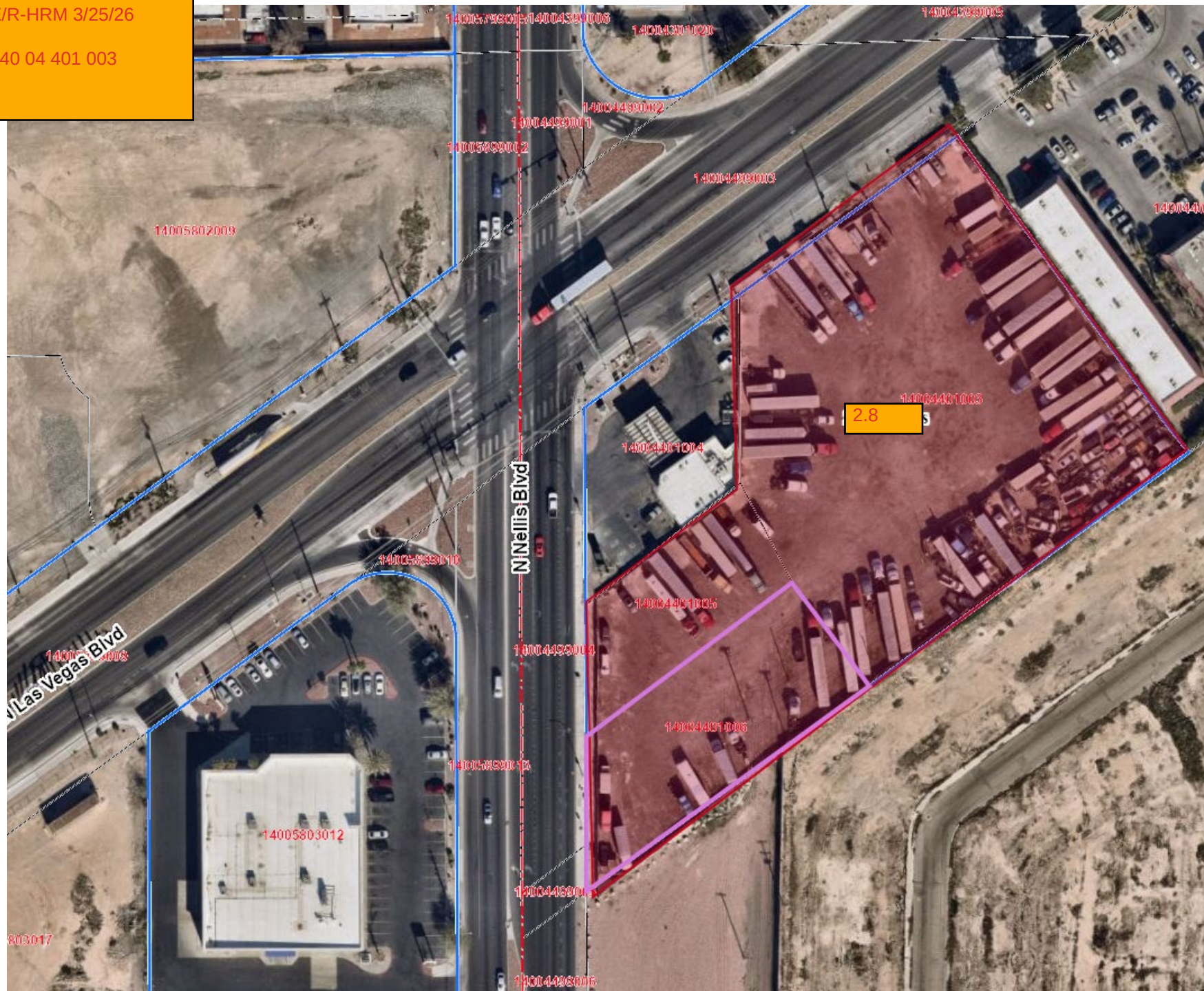
Table 1 provides the required control measures to be implemented for each soil type based on PEP. Some control measures apply to construction activities regardless of soil type. The control measures implemented must address the PEP for the area in which the construction project is permitted.

Table 1: Soil Types

Particulate Emission Potential (PEP)	Control Measure
Low	Apply water and mix moist soil with dry soil until optimum moisture content is reached to meet emissions and soil stabilization standards.
Moderate Low	Apply and mix water into soil and/or material until optimum moisture content is reached to meet emissions and soil stabilization standards.
Moderate High	Apply and mix water and surfactant solution into soil and/or material until optimum moisture content is reached to meet emissions and soil stabilization standards.
High	Apply and mix water and surfactant solution into soil and/or material until optimum moisture content is reached to meet emissions and soil stabilization standards.

The permittee shall comply with all applicable requirements for activities performed pursuant to this DCOP. If a requirement has control measures listed, permittee shall comply with one or more of the control measures. If control measures for the requirement are contingent on the project PEP/Soil Type, permittee shall comply with one or more of the control measures for the designated PEP/Soil Type.

140 04 401 003



BMP 01 BACKFILLING (filling area previously excavated or trenched)

01 Requirement

- (a) Maintain optimum moisture content in backfill material and operate equipment in a manner that limits fugitive dust to comply with the AQRs before, during, and after handling of material and during storage until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils where support equipment and vehicles will operate, and maintain in a stabilized condition.
 - (2) Dedicate an adequate water source to backfilling equipment and apply water as needed to minimize dust.
 - (3) Empty loader bucket slowly and minimize drop height from loader bucket.
 - (4) Ensure backfill material is moist or crusted at all times.
 - (5) Apply water or surfactant to maintain disturbed soils in a stable condition to limit fugitive dust.

Note: The appropriate control measure for the project soil type must be selected from Table 1.

BMP 02 BLASTING – Abrasive (sandblasting, abrasive blasting, and/or hydro-blasting)

02 Requirements

- (a) Ensure soil moisture is maintained to limit fugitive dust where support equipment and vehicles will operate until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils and maintain in a stabilized condition.
 - (2) If water is not effective, apply and maintain a surfactant and/or dust palliative on surface soils as needed.
- (b) Limit visible emissions to no more than an average of 40% opacity for any period totaling 3 minutes in any 60-minute period, or to no more than 35% instantaneous opacity, pursuant to the AQRs.
- (c) Hydro-blasting (using water as the propellant) must be conducted in a manner that maintains visible emissions within opacity standards.
- (d) Stabilize particulate matter in the surrounding area following blasting.
 - (1) Clean particulate matter from the surrounding area and water disturbed soils after blasting.
 - (2) If water is not effective, apply and maintain a surfactant and/or dust palliative on the surrounding area following blasting.

Note: Whenever possible, abrasive blasting should be conducted within an enclosed structure to limit the release of visible emissions to the atmosphere.

BMP 03 BLASTING – Soil and Rock (explosive blasting of soil and rock)

03 Requirements

- (a) Maintain optimum moisture content in soil where drills, support equipment, and vehicles will operate to prevent unstable soil conditions and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils where drills, support equipment, and vehicles will operate, and maintain in a stabilized condition.
- (b) If water is not effective, apply and maintain a surfactant and/or dust palliative on surface soils as needed.
- (c) Complete and submit a Blasting Supplemental Form; receive DAQ approval before conducting any blasting.
- (d) No blasting may be conducted within 1,500 feet of a residential area, occupied building, or major roadway when the wind direction is toward these structures.
- (e) Blasting shall take place between the hours of 8:00 a.m. and 4:30 p.m., excluding Saturdays, Sundays, and holidays, unless prior permission is obtained from the Control Officer.
- (f) No blasting is allowed when the National Weather Service forecasts wind gusts above 25 mph.
- (g) Before setting explosive charges in holes, document current and predicted weather conditions according to the National Weather Service. If the forecast is for wind gusts of 25 mph or more, do not load explosives or blast holes. If wind conditions are forecasted to be 25 mph or more during a future scheduled blast, do not load explosives or blast holes.
- (h) If DAQ issues a Construction Notice or Dust Advisory when a blast has been scheduled, do not load explosives or blast holes during the time period listed on the notice/advisory. If holes were loaded before the notices were issued, call a DAQ Compliance supervisor or manager for permission to blast.
- (i) Maintain the optimum moisture content in soil before, during, and after blasting activities to limit emissions until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Limit the blast area to what can be stabilized immediately following the blast.
 - (2) Limit disturbed areas by maintaining natural rock and vegetation.
 - (3) Presoak surface soils to the depth of caliche or bedrock with water or surfactant to limit fugitive dust.
 - (4) Apply water, surfactant, tackifier, and/or dust palliative on disturbed soils to form a crust immediately following blasting activities until the long-term stabilization requirements listed in BMP 11 are achieved.

Note: The appropriate control measure for the project soil type must be selected from Table 1.

BMP 04 CLEARING AND GRUBBING (clearing and grubbing for site preparation and vacant land cleanup)

04 Requirement

- (a) Maintain optimum moisture content in soil before, during, and after clearing and grubbing activities to prevent unstable soil conditions and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils where support equipment and vehicles will operate, and maintain in a stabilized condition.
 - (2) Apply water or surfactant during clearing and grubbing activities to prevent unstable soil conditions and limit fugitive dust.
 - (3) Apply water, surfactant, tackifier, and/or dust palliative on disturbed soils to form a crust immediately following clearing and grubbing activities until the long-term stabilization requirements listed in BMP 11 are achieved.

Note: The appropriate control measure for the project soil type must be selected from Table 1.

BMP 05 CLEARING FORMS, FOUNDATIONS AND SLABS (clearing and cleaning of forms, foundations and slabs)

05 Requirement

- (a) Limit visible emissions before, during, and after the clearing of forms, foundations, and slabs to no more than an average of 20% opacity for any period totaling 3 minutes in any 60-minute period, or to no more than 35% instantaneous opacity, pursuant to the AQRs.
 - (1) Avoid the use of high pressure air to blow soil and/or debris from forms, foundations, and slabs.
- (b) At least one of the following must be used to clear forms, foundations, and slabs:
 - (1) Water spray.
 - (2) Sweeping and water spray.
 - (3) Industrial vacuum.

BMP 06 CRUSHING (crushing of construction and demolition debris, rock, and soil)

06 Requirements

- (a) Maintain optimum moisture content in soil where support equipment and vehicles will operate to prevent unstable soil conditions and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils where support equipment and vehicles will operate, and maintain in a moist condition.
 - (2) If water is not effective, apply and maintain a surfactant and/or dust palliative on surface soils as needed.
- (b) Maintain optimum moisture content in material before, during, and after crushing activities to limit emissions.
 - (1) Pre-water material before loading it into the crusher.
 - (2) Apply water to material during crushing to ensure compliance with opacity standards and DCOP conditions.

- (3) Monitor Emissions Opacity. Make adjustments to ensure compliance with opacity standards and DCOP conditions.
- (4) Apply water to crushed material immediately following crushing.

Note: If required, obtain the appropriate stationary source permit for powered crushers prior to engaging in crushing activity and comply with stationary source permit conditions.

BMP 07 CUT AND FILL (cut and/or fill soils for site grade preparation)

07 Requirement

- (a) Maintain optimum moisture content in soil where support equipment and vehicles will operate to prevent unstable soil conditions and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils where support equipment and vehicles will operate, and maintain in a moist condition.
 - (2) If water is not effective, apply and maintain a surfactant and/or dust palliative on surface soils.
- (b) Maintain optimum moisture content in soils before, during, and after cut and fill activities to limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water to cut depth and maintain surface soils in a stabilized condition.
 - (2) Rip soil and add water and/or surfactant as needed to reach moisture throughout the cut depth.
 - (3) During cut and fill activities, apply water or surfactant to ensure moisture content is maintained to cut depth.
 - (4) Immediately following cut and fill activities, apply water, tackifier, surfactant, and/or dust palliative to disturbed soils to form a crust until the long-term stabilization requirements listed in BMP 11 are achieved.

Note: The appropriate control measure for the project soil type must be selected from Table 1.

BMP 08 DEMOLITION – Implosion (implosive blasting demolition of structure)

08 Requirements

- (a) A supplemental form for demolition and a supplement to the dust mitigation plan must be filled out, submitted to, and approved by the Control Officer prior to implosion.
- (b) An asbestos survey must be conducted on any facility before demolition can commence.
- (c) A separate, complete Demolition Notification Form must be submitted to DAQ for each structure at least 10 working days prior to demolition. The asbestos survey must be attached to this notification.
- (d) All friable and non-friable asbestos-containing material must be removed from the facility prior to implosion.
- (e) Blasting must be confined to times when the wind direction is away from the closest residential areas, occupied buildings, and major roadways.
- (f) Implosion time must be preapproved by the Control Officer.
- (g) Current weather conditions and weather predictions from the National Weather Service must be monitored and documented.
 - (1) Prior to setting explosive charges, obtain and document current and predicted weather conditions from the National Weather Service.

- (2) If average wind speeds of 10 mph or more or gusts over 20 mph are current or forecasted for the blast period, do not set charges and do not blast.
 - (3) Maintain a calibrated anemometer and log ambient air velocity and direction within 1,000 feet of the implosion site, beginning at least 1 (one) hour prior to and 15 minutes after the implosion.
- (h) Maintain optimum moisture content in soil where support equipment and vehicles will operate to prevent unstable soil conditions and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Restrict support equipment and vehicles to existing paved and/or stable areas.
 - (2) Pre-water surface soils where support equipment and vehicles will operate, and maintain in a moist condition.
 - (3) If water is not effective, apply and maintain a surfactant and/or dust palliative on surface soils as needed.
- (i) Maintain optimum moisture content in demolition debris before, during, and after implosion activities to limit emissions.
 - (1) Apply water to debris immediately following blast and safety clearance, and maintain optimum moisture content in debris throughout cleanup and exporting activities.
 - (2) If water is not effective, apply and maintain a surfactant to debris immediately following blast and safety clearance.
 - (3) Clean and stabilize surrounding areas immediately following blast and safety clearance by applying water to all disturbed soil surfaces to establish a crust.
 - (4) Thoroughly clean blast debris from paved and other surfaces following blast and safety clearance.

BMP 09 DEMOLITION - Mechanical/Manual (mechanical and manual demolition of walls, stucco, concrete, free-standing structures, buildings, and load-bearing walls)

09 Requirements

- (a) An asbestos survey must be conducted on any facility or structure subject to NESHAP requirements before demolition can commence.
- (b) A separate, complete Demolition Notification Form must be submitted to DAQ for each structure at least 10 working days prior to demolition. The asbestos survey must be attached to this notification.
- (c) Maintain optimum moisture content in soil where support equipment and vehicles will operate to prevent unstable soil conditions and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils where support equipment and vehicles will operate, and maintain in a moist condition.
 - (2) If water is not effective, apply and maintain a surfactant and/or dust palliative on surface soils as needed.
- (d) Maintain optimum moisture content in demolition debris before, during, and after demolition activities to limit emissions.
 - (1) Apply water to demolition debris during handling.
 - (2) Apply water to stabilize demolition debris immediately following demolition.

- (3) If water is not effective, apply and maintain a dust palliative to demolition debris immediately following demolition.
- (e) Stabilize surrounding area immediately following demolition by applying water and/or dust palliative to all disturbed soil surfaces.

BMP 10 DISTURBED SOIL (disturbed soil throughout project, including between structures)

10 Requirement

- (a) Maintain optimum moisture content in soils before, during, and after all construction activities to prevent unstable soils and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Limit vehicle traffic and disturbance of soils to areas not being immediately developed using fencing, barriers, and/or barricades.
 - (2) Pre-water surface soils where support equipment and vehicles will operate, and maintain in a moist condition.
 - (3) Apply water or surfactant during construction activities to prevent unstable soil conditions and limit fugitive dust.
 - (4) Apply water, surfactant, tackifier, and/or dust palliative to disturbed soils to form a crust immediately following construction activities until the long-term stabilization requirements listed in BMP 11 are achieved.
- (b) If interior block walls are planned, install walls as early as possible in the construction project.

BMP 11 LONG-TERM STABILIZATION (applies to disturbed land that is not built out, landscaped, or paved at DCOP closure)

11 Requirements

- (a) Stabilize all disturbed land within 10 days of the completion of a project, or when active operations on all or part of the construction site will cease for 30 days or more. Restrict access to these areas to prevent soil disturbance and maintain long-term stabilization where feasible. The Control Officer must approve the control method selected by the permittee before its implementation. The permittee shall select one or more of the following control methods:
 - (1) Pave.
 - (2) Apply clean gravel or dust palliative.
 - (3) Install permanent metal or wood fencing and/or a post and cable at least 3 feet high, or other similar barrier approved by the Control Officer, and stabilize soil with one of the following to create adequate crust to pass the Drop Ball Test:
 - (A) Water;
 - (B) Tackifier; or
 - (C) Dust palliative.
 - (4) Install a dirt berm at least 4 feet high, or a similar barrier approved by the Control Officer, and stabilize soil with one of the following to create adequate crust to pass the Drop Ball Test:
 - (A) Water;
 - (B) Tackifier; or

(C) Dust palliative.

- (b) Installation of signs, as described below, is required if BMPs 11(a)(2) or (4) are implemented unless the permittee obtains prior Control Officer approval based on infeasibility or lack of necessity.
 - (1) Install orange “No Parking/Trespassing” signs with black lettering, at least 24 inches wide by 18 inches high, every 50 feet or as approved by the Control Officer (Figure 1).
 - (2) Construct the sign(s) from materials capable of withstanding Clark County’s harsh environment (e.g., wood, metal, plastic).
 - (3) Attach the sign(s) to a sturdy post, such as metal or wood, placed securely in the ground, or attach the sign(s) to a fence, barricade, or other stable object that is clearly visible.
 - (4) Post on or near the property boundary, the property corners, and at all access points; post no further than 50 feet apart.
- (c) New construction or modification of paved roads or disturbance of road shoulders must be stabilized before the DCOP is closed.
 - (1) Roads with vehicular traffic equal to 3,000 vehicles or fewer per day shall have a 4-foot paved road shoulder or be stabilized with clean gravel, recycled asphalt, or traffic-rated dust palliative.
 - (2) Roads with vehicular traffic greater than 3,000 vehicles per day shall have an 8-foot paved road shoulder or be stabilized with clean gravel, recycled asphalt, or traffic-rated dust palliative.
 - (3) All disturbed areas outside the road shoulder boundaries must be treated for long-term stabilization.
- (d) New construction or modification of unpaved roads must be stabilized before the DCOP is closed. Control measures shall be considered effectively implemented when:
 - (1) Fugitive dust emissions do not exceed 20% opacity; and
 - (2) Silt loading on the unpaved road surface is not equal to or greater than 0.33 oz/ft² or the surface does not exceed 6% silt content as determined by Section 91.4.1.2, “Silt Content Test Method,” of the AQRs.

Note: No unpaved roads or alleys may be constructed in public thoroughfares in areas where Section 91, “Fugitive Dust from Unpaved Roads, Unpaved Alleys, and Unpaved Easement Roads,” is applicable.
- (e) Based on site conditions, other control methods that are at least as effective as approved control methods may be implemented with prior Control Officer approval.

BMP 12 DUST PALLIATIVE – Selection and Use (selection and use of chemical and organic dust suppressing agents and other dust palliatives)

12 Requirement

The Responsible Official shall ensure the selection and use of chemical and organic dust suppressing agents and other dust palliative shall adhere to all local, state, and federal regulations as well as all manufacturer specifications.

BMP 13 IMPORTING/EXPORTING OF BULK MATERIAL (importing or exporting of soil, aggregate, decorative rock, debris, Type II, and other bulk material)

13 Requirement

- (a) Maintain optimum moisture content in surface soils and bulk material before, during, and after all importing/exporting activities to prevent unstable soils and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils where importing/exporting activities occur, including haul routes, and maintain in a moist condition.
 - (2) If water is not effective, apply and maintain a surfactant and/or dust palliative, or clean gravel, on surface soils where importing/exporting activities occur, including haul routes.
 - (3) Limit vehicle speeds to 15 mph on the work site.
 - (4) Maintain 3–6 inches of freeboard to prevent spillage.
 - (5) Apply tarps or other suitable enclosures that completely cover the load on haul trucks before they exit the project onto public roads, and maintain throughout transport. Tarps must be well-maintained and serviceable at all times.
- (b) Clean the wheels and undercarriage of haul trucks before they leave the Construction site.
- (c) Check belly/end dump truck seals regularly, and remove trapped rocks to prevent spillage.

BMP 14 LANDSCAPING (installation of sod, decorative rock, desert or other landscape material)

14 Requirement

- (a) Maintain optimum moisture content in soils and landscaping material before, during, and after landscaping activities to limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
- (b) Apply water or surfactant to maintain disturbed soils and landscaping material in a stable condition until the long-term stabilization requirements listed in BMP 11 are achieved.

Note: The appropriate control measure for the project soil type must be selected from Table 1.

BMP 15 SUBGRADE PREPARATION FOR PAVING (subgrade preparation for paving streets, parking lots, etc.)

15 Requirement

- (a) Maintain optimum moisture content in soils before, during, and after all paving/subgrade preparation activities to prevent unstable soils and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water subgrade surfaces until optimum moisture content is reached.
 - (2) Maintain optimum moisture content in material while aggregate is being applied.
 - (3) Place tack coat on aggregate base.

BMP 16 SAWING/CUTTING MATERIALS (sawing or cutting materials such as concrete, asphalt, block or pipe)

16 Requirement

- (a) Limit visible emissions to no more than an average of 20% opacity for any period totaling 3 minutes in any 60-minute period, or to no more than 35% instantaneous opacity, pursuant to the AQRs. One of the following two control methods must be used when sawing/cutting materials:
 - (1) Use water to control dust.

- (2) Use a vacuum to collect dust.

BMP 17 SCREENING (screening of rock, soil, or construction debris)

17 Requirements

- (a) Maintain optimum moisture content in soil where support equipment and vehicles will operate to prevent unstable soil conditions and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils where support equipment and vehicles will operate, and maintain in a moist condition.
 - (2) If water is not effective, apply and maintain a surfactant and/or dust palliative on surface soils as needed.
- (b) Maintain optimum moisture content in material before, during, and after screening activities to limit emissions until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Apply sufficient water or a dust suppressant prior to screening.
 - (2) Drop material through the screen slowly; minimize drop height.
 - (3) Dedicate an adequate water source to the screening operation, and apply water as needed to minimize dust.
 - (4) Monitor visible emissions; make adjustments to control measures to ensure compliance with opacity standards and DCOP conditions.
 - (5) Apply water, surfactant, or dust palliative to screened material and surrounding areas following screening activities until long-term stabilization is achieved.

Note: If required, obtain the appropriate stationary source permit for powered screens before engaging in screening activity and comply with stationary source permit conditions.

BMP 18 STAGING AREAS (staging areas and equipment/material storage areas)

18 Requirement

- (a) Maintain optimum moisture content in soils before, during, and after all staging area activities to prevent unstable soils and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils where support equipment and vehicles will operate, and maintain in a moist condition.
 - (2) If water is not effective, apply and maintain a surfactant and/or dust palliative on surface soils as needed.
 - (3) Limit vehicle speed to 15 mph in staging area(s) and on all unpaved access routes.
 - (4) Apply water, clean gravel, recycled asphalt, or dust palliative to staging area soils for the duration of the project.

BMP 19 STOCKPILING (stockpiling of materials, such as Type II, rock or debris, for future use or export)

19 Requirement

- (a) Maintain optimum moisture content in soil where support equipment and vehicles will operate to prevent unstable soil conditions and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.

- (1) Pre-water surface soils where support equipment and vehicles will operate, and maintain in a moist condition.
- (2) If water is not effective, apply and maintain a surfactant and/or dust palliative on surface soils as needed.
- (b) Maintain optimum moisture content in material before, during, and after stockpiling activities to limit fugitive dust until long-term stabilization is achieved.
 - (1) Stockpiles located 100 yards or less from occupied buildings must be less than 8 feet high unless the permittee occupies the buildings or receives prior Control Officer approval based on feasibility, necessity, or other condition. Stockpiles located farther than 100 yards from occupied building may be higher than 8 feet.
 - (A) Stockpiles higher than 8 feet shall have a road bladed to the top to allow water truck access, or the permittee must demonstrate to the Control Officer another means of effectively controlling dust from the entire stockpile.
 - (2) Apply water or surfactant during stockpiling activities to prevent unstable soil conditions and limit fugitive dust.
 - (3) Apply water, surfactant, tackifier, and/or dust palliative to material and surface soils to form a crust immediately following stockpiling activities until the long-term stabilization requirements listed in BMP 11 are achieved,
- (c) All stockpiles must be removed or leveled prior to project completion unless otherwise approved by the Control Officer. Stockpiles approved to be left in place must be in compliance with the long-term stabilization requirements listed in BMP 11.

Note: The appropriate control measure for the project soil type must be selected from Table 1.

BMP 20 TRACKOUT PREVENTION AND CLEANUP (prevention and cleanup of mud, silt, and soil tracked out onto paved surfaces)

20 Requirements

- (a) Install and maintain a trackout control device in an effective condition at all locations where paved and unpaved travel routes intersect.
 - (1) Install gravel pad(s) consisting of a minimum of 2 inches in rough diameter of clean gravel or crushed rock on a well-graded surface (Type II material is not acceptable). Minimum dimensions must be 30 feet wide by 6 inches deep by 50 feet in length or the length of the longest haul truck, whichever is greater. Re-screen, wash, or apply additional rock to gravel pads to maintain effectiveness.
 - (A) Install wheel shakers if gravel pads are not effective in preventing trackout. Clean wheel shakers regularly to maintain their effectiveness.
 - (B) Install wheel washers if wheel shakers are not effective in preventing trackout. Maintain wheel washers regularly to maintain effectiveness.
 - (C) Alternative trackout control devices may be used if approved by the Control Officer.
 - (2) All exiting traffic must be routed over selected trackout control device(s) by clearly establishing and enforcing traffic patterns on-site.
- (b) Maintain dust control and clean all trackout from paved surfaces.
 - (1) Maintain dust control during working hours and clean all trackout from paved surfaces, including sidewalks and gutters, at the end of each work shift.

- (2) Immediately clean up trackout that extends 50 feet or more, or more than ¼ inch in depth, from paved surfaces, including sidewalks and gutters, or any amount of trackout that causes one or more of the following:
 - (A) A dust plume that extends more than 100 feet horizontally or vertically.
 - (B) An average of 20% opacity for any period totaling 3 minutes in any 60-minute period, pursuant to the AQRs.
 - (C) 35% instantaneous opacity, pursuant to the AQRs.
- (3) Use street sweeper(s) in addition to trackout control devices to ensure the cleanup of trackout is maintained. If one street sweeper is not effective in controlling trackout pursuant to the AQRs, bring in additional street sweepers.
- (4) The use of blower devices to remove deposited mud/dirt trackout from a paved road is prohibited except when the use of water is not technically feasible and only with prior Control Officer approval.
- (5) The use of rotary brushes without water is prohibited. Dry rotary brushes may only be used when the use of water is not technically feasible and only with prior Control Officer approval.
- (6) The use of soil to create a ramp for vehicle access over a curb is prohibited.

BMP 21 TRAFFIC—Unpaved Routes and Parking Areas (construction-related traffic on unpaved roads and parking areas)

21 Requirement

- (a) Limit visible dust emissions from vehicle operations and stabilize all unpaved routes, including unpaved parking areas.
 - (1) Limit vehicle speeds to 15 mph on all unpaved routes and parking areas.
 - (2) Apply water to unpaved haul routes and off-road traffic areas, including parking areas, and maintain in a stabilized condition.
 - (3) If water is not effective, apply and maintain a surfactant and/or dust palliative on unpaved routes, off-road traffic areas, and parking areas.
 - (4) If water, surfactant, and/or dust palliative is not effective, apply and maintain clean gravel (or other suitable material approved by the Control Officer) on unpaved routes, off-road traffic areas, and parking areas.
 - (5) If a preexisting unpaved road or haul route is being used but is not permitted, it must be maintained in a stabilized condition. These unpaved roads or haul routes must not be changed in any way unless permitted or as approved by the Control Officer.

BMP 22 TRENCHING (trenching with track- or wheel-mounted excavator, shovel, backhoe, or trencher)

22 Requirement

- (a) Maintain optimum moisture content in soil where support equipment and vehicles will operate to prevent unstable soil conditions and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils where support equipment and vehicles will operate, and maintain in a moist condition.
 - (2) If water is not effective, apply and maintain a surfactant and/or dust palliative on surface soils as needed.

- (b) Maintain optimum moisture content in soils before, during, and after trenching activities to limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils before trenching.
 - (2) Apply water or surfactant during trenching activities to prevent unstable soil conditions, and limit fugitive dust by dedicating a water truck or large hose.
 - (3) Apply water, surfactant, tackifier, and/or dust palliative to excavated soils to form a crust immediately following trenching activities until the long-term stabilization requirements listed in BMP 11 are achieved.

Note: The appropriate control measure for the project soil type must be selected from Table 1.

BMP 23 TRUCK LOADING (loading trucks with materials including construction and demolition debris, rock, and soil)

23 Requirement

- (a) Maintain optimum moisture content in soil where support equipment and vehicles will operate to prevent unstable soil conditions and limit fugitive dust until the long-term stabilization requirements listed in BMP 11 are achieved.
 - (1) Pre-water surface soils where support equipment and vehicles will operate, and maintain in a moist condition.
 - (2) If water is not effective, apply and maintain a surfactant and/or dust palliative on surface soils as needed.
- (b) Maintain optimum moisture content in material before, during, and after truck loading activities to limit fugitive dust.
 - (1) Mix material with water, surfactant, or tackifier prior to truck loading activities to limit fugitive dust.
 - (2) Empty loader bucket slowly and minimize the drop height while dumping.

Note: The appropriate control measure for the project soil type must be selected from Table 1.

From: [Heather Mackinnon](#)
To: "amy@sugdenlaw.com"; "roblauer@pm.me"
Cc: [Satyra George](#); [Allan Gutierrez](#)
Subject: FW: DUST CONTROL PERMIT: LEADING EDGE VENTRUES LLC-VEGAS/NELLIS TRUCK PARKING YARD
Date: Monday, April 6, 2026 9:15:00 AM
Attachments: [image005.png](#)
[image006.png](#)
[image007.png](#)
Importance: High

Hi Rob,

I see you have registered/paid for the dust class.

Please confirm that you will pave by the permit expiration in 2027.

Renewals of the Dust Control Operating Permit are conditional upon meeting compliance with Air Quality Regulations Section 92.

Regards,

Heather Mackinnon

Air Quality Specialist II

Department of Environment and Sustainability

Air Quality Division – Enforcement Section

Phone: (702) 455-1524 Fax: (702) 383-9994

4701 W. Russell Rd, #200, LV NV 89118

My hours are Mon-Thur 6am-4:30pm

****CLOSED Fridays and Federal Holidays****

For Dust Control Applications, Forms and mapping guidance, click on this link: [Dust Control Permitting Portal, Forms & Requirements](#)

[Click here for Dust Class Info](#)

From: Heather Mackinnon
Sent: Thursday, April 2, 2026 6:05 AM
To: 'roblauer' <roblauer@pm.me>
Cc: 'amy@sugdenlaw.com' <amy@sugdenlaw.com>; DEVON BROWN <DEVON.BROWN@CLARKCOUNTYDANV.GOV>; Satyra George <Satyra.George@ClarkCountyNV.gov>; Allan Gutierrez <Gutierre@ClarkCountyNV.gov>
Subject: RE: DUST CONTROL PERMIT: LEADING EDGE VENTRUES LLC-VEGAS/NELLIS TRUCK PARKING YARD

Hi Rob,

You can come in anytime from 7:30-5:00. The front counter folks can help you. I'm working remotely Wed/Thurs so I'm not in the office.

Regards,

Heather Mackinnon

Air Quality Specialist II

Department of Environment and Sustainability

Air Quality Division – Enforcement Section

Phone: (702) 455-1524 Fax: (702) 383-9994

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[Click here for Dust Class Info](#)

From: roblauer <roblauer@pm.me>
Sent: Wednesday, April 1, 2026 4:02 PM
To: Heather Mackinnon <Heather.Mackinnon@ClarkCountyNV.gov>
Cc: 'amy@sugdenlaw.com' <amy@sugdenlaw.com>; DEVON BROWN <DEVON.BROWN@CLARKCOUNTYDANV.GOV>; Satyra George <Satyra.George@ClarkCountyNV.gov>; Allan Gutierrez <Gutierre@ClarkCountyNV.gov>
Subject: RE: DUST CONTROL PERMIT: LEADING EDGE VENTRUES LLC-VEGAS/NELLIS TRUCK PARKING YARD

Heather,

I can come by tomorrow and pay the \$57 fee.

What hours will you be in the office?

I'd like to keep the same class time. So perhaps we can schedule it together tomorrow when I come?

Rob

On Wednesday, April 1st, 2026 at 8:34 AM, Heather Mackinnon <Heather.Mackinnon@ClarkCountyNV.gov> wrote:

Rob,

Since you did not pay w/in the 7 days of the invoice being issued, your registration has been cancelled. You must re-register, once you do that you can come into the front counter and pay your invoice. Let me know as soon as this is accomplished.

Regards,

Heather Mackinnon

Air Quality Specialist II

Department of Environment and Sustainability

Air Quality Division – Enforcement Section

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4701 W. Russell Rd, #200, LV NV 89118

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[Click here for Dust Class Info](#)

From: roblauer <roblauer@pm.me>
Sent: Wednesday, April 1, 2026 8:04 AM
To: Heather Mackinnon <Heather.Mackinnon@ClarkCountyNV.gov>
Cc: 'amy@sugdenlaw.com' <amy@sugdenlaw.com>; DEVON BROWN <DEVON.BROWN@CLARKCOUNTYDANV.GOV>; Satyra George <Satyra.George@ClarkCountyNV.gov>; Allan Gutierrez <Gutierre@ClarkCountyNV.gov>
Subject: RE: DUST CONTROL PERMIT: LEADING EDGE VENTRUES LLC-VEGAS/NELLIS TRUCK PARKING YARD

Yes that represents the area we are using for truck parking.

I still have not received any email from the system to pay the \$57 fee for the class.
see attached screen shot.

Rob Lauer

On Wednesday, April 1st, 2026 at 7:03 AM, Heather Mackinnon <Heather.Mackinnon@ClarkCountyNV.gov>

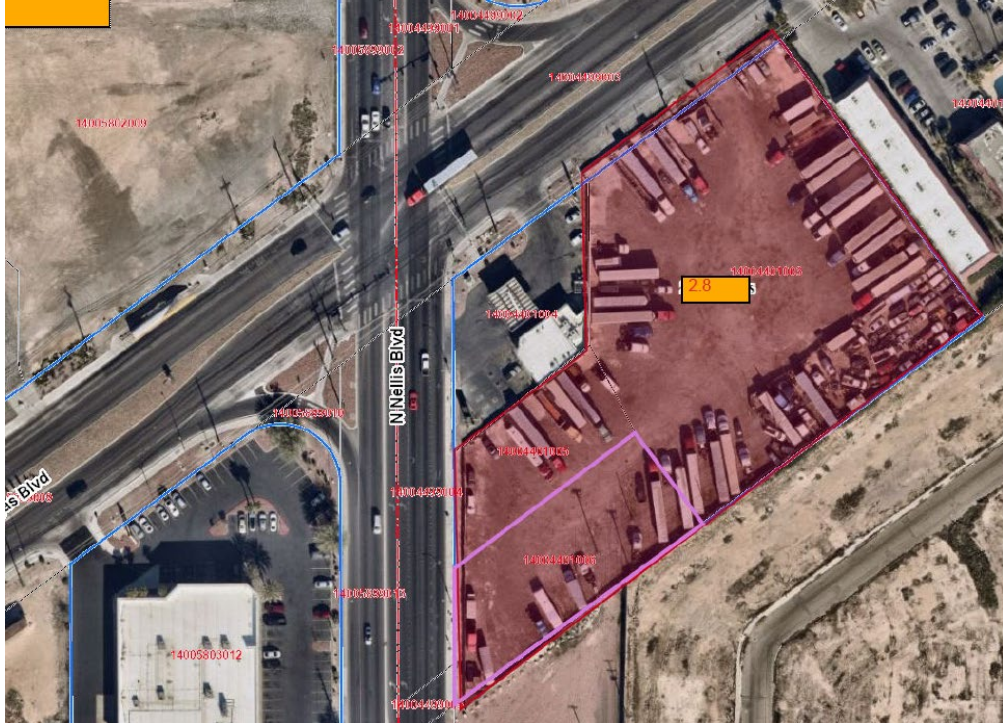
wrote:

Mr. Lauer,

I'm not seeing a paid invoice for the dust class. I know my supervisor had guided you through the process. I have also not heard back from you regarding the map I helped you with below. Please reply ASAP so I can complete my review.

Normally if the invoice for the dust class is not paid by the 7th day (from 3/18) the application will be cancelled. I will ask my supervisor if there is a way around this.

Please view the picture below and let me know if this correctly reflects the areas that you are required to pave.



Regards,

Heather Mackinnon

Air Quality Specialist II

Department of Environment and Sustainability

Air Quality Division – Enforcement Section

Phone: (702) 455-1524 Fax: (702) 383-9994

4701 W. Russell Rd, #200, LV NV 89118

My hours are Mon-Thur 6am-4:30pm

****CLOSED Fridays and Federal Holidays****

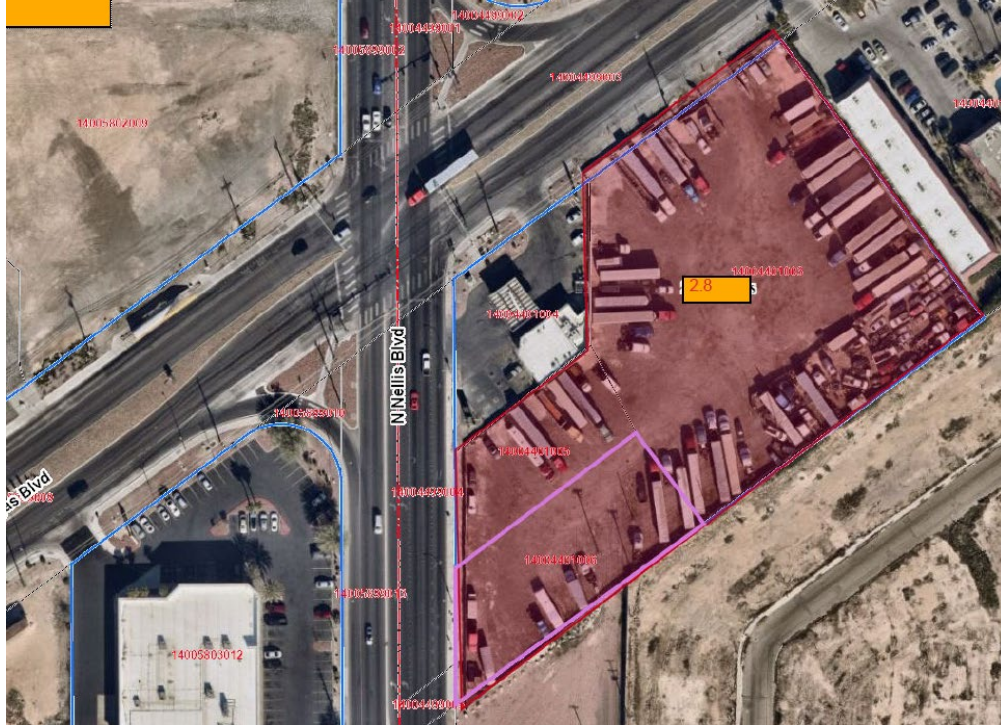
For Dust Control Applications, Forms and mapping guidance, click on this link: [Dust Control Permitting Portal, Forms & Requirements](#)

[Click here for Dust Class Info](#)

Good morning Mr. Lauer,

Please view the picture below and let me know if this correctly reflects the areas that you are required to pave.

Let me know that you were able to pay for your dust class with the instructions that were sent to you by my supervisor.



Regards,

Heather Mackinnon

Air Quality Specialist II

Department of Environment and Sustainability

Air Quality Division – Enforcement Section

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4701 W. Russell Rd, #200, LV NV 89118

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[Click here for Dust Class Info](#)

From: roblauer <roblauer@pm.me>

Sent: Monday, March 23, 2026 3:03 PM

To: Heather Mackinnon <Heather.Mackinnon@ClarkCountyNV.gov>

Cc: amy@sugdenlaw.com; DEVON BROWN <DEVON.BROWN@CLARKCOUNTYDANV.GOV>; Satyra George <Satyra.George@ClarkCountyNV.gov>; Allan Gutierrez <Gutierre@ClarkCountyNV.gov>

Subject: RE: DUST CONTROL PERMIT: LEADING EDGE VENTRUES LLC-VEGAS/NELLIS TRUCK PARKING YARD

The system is still not allowing me to make a payment

And I will need help with the mapping

On Monday, March 23rd, 2026 at 1:36 PM, Heather Mackinnon

<Heather.Mackinnon@ClarkCountyNV.gov> wrote:

Hi,

I need the maps we require. We do not accept engineered prints/drawings. I have attached the sample maps again.

Invoices need to be paid as soon as you receive them. The 7 days is a deadline, if not paid by then, the application will be withdrawn.

Select "other" for program type, then the entity source will be blurred so there is nothing to enter.

Notes: Dust Card Class, Registration ID# 12896, 1 Seat Reserved for 4/14/2026, Individual: Robert Lauer, Submitted 3/23/2026.	Subtotal:	\$57.00
	Paid:	\$0.00
	Adjustments:	\$0.00
	Balance Due:	\$57.00
Mail or drop off payment to 4701 W Russell Road Suite 200, Las Vegas, NV 89118. Payments can be made by check, money order, Visa, or MasterCard. Checks and money orders must be made payable to Division of Air Quality, Air Quality or DAQ. Credit card and ACH/eCheck payments may be made in person or via the Payment Portal on the DES website. If you have invoice questions, please contact DES-Finance at AQFinance@ClarkCountyNV.gov or 702-455-5942.		
Clark County Division of Air Quality 4701 W Russell Road, Suite 200 Las Vegas, NV 89118-2231		
Source Name: DUST CONTROL PROGRAM POS		
Source ID: 12896		
Invoice #: 081367		
Balance Due: \$57.00		
Due Date: 3/23/2026		

Regards,

Heather Mackinnon



Air Quality Specialist II

Department of Environment and Sustainability

Air Quality Division – Enforcement Section

Phone: (702) 455-1524 Fax: (702) 383-9994

4701 W. Russell Rd, #200, LV NV 89118

My hours are Mon-Thur 6am-4:30pm

****CLOSED Fridays and Federal Holidays****

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[Click here for Dust Class Info](#)

From: roblauer <roblauer@pm.me>

Sent: Monday, March 23, 2026 11:14 AM

To: Heather Mackinnon <Heather.Mackinnon@ClarkCountyNV.gov>

Cc: amy@sugdenlaw.com; DEVON BROWN
<DEVON.BROWN@CLARKCOUNTYDANV.GOV>; Satyra George
<Satyra.George@ClarkCountyNV.gov>; Allan Gutierrez
<Gutierre@ClarkCountyNV.gov>
Subject: Re: DUST CONTROL PERMIT: LEADING EDGE VENTRUES LLC-
VEGAS/NELLIS TRUCK PARKING YARD

The attached site plan submitted to comprehensive planning clearly shows 2.814 acres with a layout of the truck parking area.

I am trying to pay the dust class fee (when I signed for the class it said the fees where no due until 7 days prior to the class fyi) anyways, I stuck on the invoice payment page.

What is the program type and entity source?

On Monday, March 23rd, 2026 at 10:19 AM, Heather Mackinnon
<Heather.Mackinnon@ClarkCountyNV.gov> wrote:

Greetings,

Please reply to this email only as soon as possible. **You cannot edit the application after submittal in the portal, only the reviewer can.** I have reviewed your Dust Control Operating Permit (DCOP) application and have questions, concerns or need additional information. Applications cannot be updated with verbal authorization so please reply to this email. If you have questions, feel free to email me those inquiries.

Please have the dust class invoice paid ASAP or the application will be cancelled. You have 7 calendar days from 3/18/26.

The application submitted did not include an assessor's parcel map. All Dust Control Operating Permit applications, renewals and modifications require a marked assessor's parcel map **that clearly shows the area and acreage justification.** Must have at least two cross street names showing. Attached are samples of what DAQ requires.

Regards,

Heather Mackinnon



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Air Quality Division – Enforcement Section
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****CLOSED Fridays and Federal Holidays****

For Dust Control Applications, Forms and mapping guidance, click on this link: [Dust Control Permitting Portal, Forms & Requirements](#)

[Click here for Dust Class Info](#)

From: Heather Mackinnon

Sent: Wednesday, March 25, 2026 6:58 AM

To: 'roblauer' <roblauer@pm.me>

Cc: 'amy@sugdenlaw.com' <amy@sugdenlaw.com>; DEVON BROWN

<DEVON.BROWN@CLARKCOUNTYDANV.GOV>; Satyra George

<Satyra.George@ClarkCountyNV.gov>; Allan Gutierrez <Gutierre@ClarkCountyNV.gov>

Subject: RE: DUST CONTROL PERMIT: LEADING EDGE VENTRUES LLC-VEGAS/NELLIS
TRUCK PARKING YARD

Importance: High