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PART 70

TECHNICAL SUPPORT DOCUMENT

(STATEMENT of BASIS)

APPLICATION FOR:
Administrative Revision

PREPARED BY:
Clark County Department of Environment and Sustainability

Source Name: PABCO Gypsum
Source ID: 00011

SOURCE LOCATION:
8000 East Lake Mead Boulevard
Las Vegas, Nevada 89124

SIC 3275: Gypsum Products
NAICS Code 327420: Gypsum Product Manufacturing

TSD Date: December 7, 2023

EXECUTIVE SUMMARY

PABCO Gypsum, a division of PABCO Building Products, LLC, is a wallboard manufacturing facility that falls under SIC code 3275, “Gypsum Products,” and NAICS code 327420, “Gypsum Product Manufacturing.” The facility is located in Hydrographic Area 215 (the Black Mountains area), which is classified as attainment for all regulated air pollutants. The source is subject to the requirements of 40 CFR Part 60, Subparts III, OOO, and UUU, and 40 CFR Part 63, Subpart ZZZZ. It is neither a categorical stationary source as defined in AQR 12.2.2(j) nor belongs to a stationary source category which, as of August 7, 1980, is being regulated under Section 111 or 112 of the Act. Therefore, fugitive emissions are not included in source status determination. The source is a major stationary source for NO_x and CO, a synthetic minor source for PM₁₀, and PM_{2.5}, and a minor source for SO₂, VOC and HAP.

The PABCO operation includes the mining, crushers, screens, calciners, aggregate dryers, impeller mills, mixers, storage bins, conveyors, and board dryers needed to manufacture wallboard panels. Gypsum ore is mined from an on-site quarry, passed through several beneficiation processes, and stored prior to its use in the manufacturing processes. Under the primary operating scenario, PABCO receives exhaust gas from the co-located power-generating facility owned and operated by Nevada Cogeneration Associates #2 (NCA #2) to operate the Coe board dryer. The alternative operating scenario, in which the Coe board dryer uses its own burners, is triggered when NCA #2 turbine exhaust gas is unavailable. In addition to the wallboard manufacturing operations, the source operates diesel-powered water pumps and an aboveground gasoline storage tank.

To reduce waste, a reclaim/reuse process recycles approximately 4% of all manufactured wallboard that does not meet industry specifications.

Table 1 summarizes the source PTE for each regulated air pollutant for all emission units addressed by this Part 70 Operating Permit.

Table 1. Source PTE (tons per year)

Pollutants	PM₁₀	PM_{2.5}	NO_x	CO	SO₂	VOC	HAP	CO_{2e}
Nonfugitive Emissions	68.62	30.15	313.44	457.25	3.95	79.59	7.74	292,046
Fugitive Emissions	61.65	7.41	4.70	16.55	0.84	0	0	0.33
Source PTE	130.29	37.59	318.14	473.80	4.79	79.59	7.74	292,046.33
Major Source Thresholds (Title V)	100	100	100	100	100	100	10/25	
Major Source Thresholds (PSD)	250	250	250	250	250	250	10/25	

TABLE OF CONTENTS

I.	PROCESS DESCRIPTION	5
II.	PERMITTING ACTION	5

ACRONYMS AND ABBREVIATIONS

ANFO	ammonium nitrate-fuel oil
AQR	Clark County Air Quality Regulation
ATC	authority to construct
BACT	best available control technology
CARB	California Air Resources Board
CFR	Code of Federal Regulations
CH ₄	methane
CO	carbon monoxide
CO _{2e}	carbon dioxide equivalent
DAQ	Division of Air Quality
DES	Clark County Department of Environment and Sustainability
EPA	U.S. Environmental Protection Agency
EU	emission unit
GDO	gasoline dispensing operation
H ₂ S	hydrogen sulfide
hp	horsepower
gpm	gallons per minute
MMBtu	British thermal units (in millions)
N ₂ O	nitrous oxide
NAICS	North American Industry Classification System
NOV	notice of violation
NO _x	nitrogen oxide(s)
O&M	operations and maintenance
Pb	lead
PM _{2.5}	particulate matter less than 2.5 microns in aerodynamic diameter
PM ₁₀	particulate matter less than 10 microns in aerodynamic diameter
ppm	parts per million
PTE	potential to emit
RACT	reasonably available control technology
RT	round trip
SDE	status determination emissions
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
TDS	total dissolved solids
VAEL	voluntary accepted emission limit
VMT	vehicle miles traveled
VOC	volatile organic compound

I. PROCESS DESCRIPTION

PABCO has organized the various operations into groups, as described in the emission unit list. A detailed description is not included in this TSD because no changes to the operations was proposed with any of the applications associated with this permitting action. Affected processes are described in the permitting action section of this TSD.

II. PERMITTING ACTION

This permitting action was initiated internally in response to two Permit Change Referral Forms submitted on November 8, 2023. These forms identified the following errors, which have been corrected with this permitting action:

1. The concentration limitation identified in Table 3-3 for EUs: K01, K02, & K04 – K07 is correct, but the units are not consistent with the table heading. The table heading identifies the values as being in units of grains per dry standard cubic feet. However, the value entered in the table is in units grams per dry standard cubic meter.
2. EU: B25, and the corresponding concentration limitation was omitted from Table 3-3.
3. EU: B25 was omitted from Condition 4.2.12.
4. Performance testing is required for Baghouse 1, which controls EUs: B25, and K04 – K07, but was omitted from Table 4-4.

All the above changes have been addressed with this permitting action.

Misidentifying the units associated with a numerical value, as in Item II-1, and omitting emission unit identifiers from tables and permit conditions, as in Items II-2, II-3, and II-4, constitute typographical errors. As a result, the revisions associated with this permitting action fall under the definition of an administrative revision in accordance with AQR 12.5.2.13(a)(1).

The corrections identified above have no impact on the source PTE, permitted emission units, requirements for monitoring, testing, and control devices, or applicable local and federal regulations. Therefore, these categories are not addressed in this document.