



**DES**  
DEPARTMENT OF ENVIRONMENT  
AND SUSTAINABILITY



4701 W. Russell Rd Suite 200  
Las Vegas, NV 89118-2231  
Phone (702) 455-5942  
Fax (702) 383-9994

## PART 70 OPERATING PERMIT

**SOURCE ID: 00011**

**PABCO GYPSUM**

8000 East Lake Mead Boulevard

Las Vegas, NV 89124

T20S, R64E, Section 7

Hydrographic Area Number: 215

**ISSUED ON: February 11, 2025**

**EXPIRES ON: February 10, 2030**

**Current action: Renewal**

**Issued to:**

PABCO Building Products, LLC

P.O. Box 364329

North Las Vegas, Nevada 89036

**Responsible Official:**

Serge Mazzocato

Vice President of Manufacturing

PHONE: (702) 407-3700 FAX (702) 643-6249

EMAIL: serge.mazzocato@pabcoypsum.com

**NATURE OF BUSINESS:**

- SIC Code 3275, "Gypsum Products"
- NAICS Code 327420, "Gypsum Product Manufacturing"
- SIC Code 1442, "Construction Sand and Gravel"
- NAICS Code 212321, "Construction Sand and Gravel Mining"

**Issued by the Clark County Department of Environment and Sustainability/Division of Air Quality in accordance with Section 12.5 of the Clark County Air Quality Regulations.**

Santosh Mathew, Permitting Manager

## 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 (Black Mountains), which is classified as attainment for all regulated air pollutants. The source is subject to the requirements of 40 CFR Part 60, Subparts IIII, OOO, and UUU, and 40 CFR Part 63, Subparts ZZZZ and CCCCCC. It is not a categorical 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<sub>x</sub> and CO, a synthetic minor source for PM<sub>10</sub>, and PM<sub>2.5</sub>, and a minor stationary source for SO<sub>2</sub>, 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 then stored prior to its use in 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 wallboard manufacturing operations, the source operates diesel-powered water pumps and an aboveground gasoline storage tank.

As a means to reduce waste, a reclaim/reuse process is used that recycles approximately 4% of all manufactured wallboard that does not meet industry specifications.

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

**Table 1: Source-wide Potential to Emit**

Pollutants	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP <sup>1</sup>	GHG <sup>2</sup>
Nonfugitive Emissions	68.64	30.18	313.44	457.25	3.95	79.59	7.74	314,692.52
Fugitive Emissions	61.65	7.41	4.70	16.55	0.84	0	0	0
Source PTE	130.29	37.59	318.14	473.80	4.79	79.59	7.74	314,692.52

<sup>1</sup>10 tons for any individual HAP or 25 tons for any combination of HAPs.

<sup>2</sup>Expressed in units of CO<sub>2</sub>e

DAQ will continue to require the permittees to estimate their GHG PTE in terms of each individual pollutants (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, SF<sub>6</sub> etc.) during subsequent permitting actions, and the corresponding TSDs will includes these PTEs for informational purposes.

Pursuant to AQR 12.5.2.7, all terms and conditions in Sections 1 through 8 of this Operating Permit and in all its attachments are federally enforceable unless explicitly denoted otherwise.

## TABLE OF CONTENTS

<b>1.0</b>	<b>EQUIPMENT</b> .....	<b>5</b>
1.1	Emission Units.....	5
1.2	Insignificant activities.....	11
1.3	Nonroad Engines.....	11
<b>2.0</b>	<b>CONTROLS</b> .....	<b>12</b>
2.1	Control Devices .....	12
2.2	Control Requirements.....	13
<b>3.0</b>	<b>LIMITATIONS AND STANDARDS</b> .....	<b>17</b>
3.1	Operational Limits .....	17
3.2	Emission Limits .....	19
<b>4.0</b>	<b>COMPLIANCE DEMONSTRATION REQUIREMENTS</b> .....	<b>27</b>
4.1	Monitoring .....	27
4.2	Testing.....	32
4.3	Recordkeeping .....	38
4.4	Reporting and Notifications.....	41
4.5	Mitigation.....	44
<b>5.0</b>	<b>PERMIT SHIELD</b> .....	<b>45</b>
<b>6.0</b>	<b>OTHER REQUIREMENTS</b> .....	<b>46</b>
<b>7.0</b>	<b>ADMINISTRATIVE REQUIREMENTS</b> .....	<b>47</b>
7.1	General.....	47
7.2	Modification, Revision, and Renewal Requirements .....	48
<b>8.0</b>	<b>ATTACHMENTS</b> .....	<b>50</b>
8.1	Applicable Regulations.....	50

## LIST OF TABLES

Table 1:	Source-wide Potential to Emit .....	2
Table 1-1:	List of Emission Units.....	5
Table 1-2:	Summary of Insignificant Activities .....	11
Table 2-1:	Summary of Add-On Control Devices.....	12
Table 3-1:	Operational Limitations.....	17
Table 3-2:	Emission Unit PTE (tons per year).....	19
Table 3-3:	Emission Rates and Concentration Limits Summary .....	25
Table 4-1:	Emission Units Subject to CAM Requirements.....	31
Table 4-2:	Monitoring Approach for Baghouses – PM <sub>10</sub> and Opacity .....	32
Table 4-3:	Performance Testing Methods for Combustion Emissions .....	34
Table 4-4:	Performance Testing Protocols .....	35
Table 4-5:	Vapor Recovery System Testing Procedures and Schedules .....	37
Table 4-6:	Required Submission Dates for Various Reports.....	43
Table 8-1:	Applicable Clark County AQRs.....	50
Table 8-2:	Federal Standards .....	51

---

## Common Acronyms and Abbreviations

(These terms may be seen in the permit)

<b>Acronym</b>	<b>Term</b>
ANFO	ammonium nitrate-fuel oil
AQR	Clark County Air Quality Regulation
BLM	Bureau of Land Management
CARB	California Air Resources Board
CFR	Code of Federal Regulations
CO	carbon monoxide
CO <sub>2</sub> e	carbon dioxide equivalent
DAQ	Division of Air Quality
DES	Clark County Department of Environment and Sustainability
DOM	date of manufacture
EPA	U.S. Environmental Protection Agency
EU	emission unit
HAP	hazardous air pollutant
hp	horsepower
HOO	Hearing Officer Order
kW	kilowatt
MMBtu/hr	Millions of British Thermal Units per Hour
msf	thousand square feet
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standard
NSR	New Source Review
OP	Operating Permit
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in diameter
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
PTE	potential to emit
RMP	Risk Management Plan
scf	standard cubic feet
scfm	standard cubic feet per minute
SIC	Standard Industrial Classification
SO <sub>2</sub>	sulfur dioxide
SOP	standard operating procedure
TDS	Total Dissolved Solids
tpy	tons per year
VEE	Visible Emissions Evaluation
VMT	vehicle miles traveled
VOC	volatile organic compound

---

## 1.0 EQUIPMENT

### 1.1 EMISSION UNITS

The stationary source covered by this Part 70 Operating Permit (Part 70 OP) consists of the emission units and associated appurtenances summarized in Table 1-1. [AQR 12.5.2.3]

**Table 1-1: List of Emission Units**

EU	Description	Rating	Make	Model #	Serial #
<b>Quarry Operations (Group #1)</b>					
A1	Material Loading				
A5	Drilling and Blasting	10,000 holes/yr			
		50,000 sq ft/blast			
		750 tons ANFO per year			
<b>Beneficiation Operations (Group #2)</b>					
B1	Hopper Feeder				
B2	Primary Crusher	615 tons/hr	Pioneer	VS4248	403748
B3	Conveyor System (5 belts & stacker)				
B37	Apron Feeder (2 bins)				
S07	Ore Reclaim Belt				
B40	Screen	615 tons/hr	JCI	6202-32LF	S071888
B42	Screen Collection Belt				
B41	Hammer Mill	615 tons/hr	Universal Engineering	7036598	306X615
S13	Recycle Belt				
B36	Rotary Dryer #2	288 tons/hr; 85 MMBtu/hr	Gencor	CFS225	225BH155898-07-NA
B25	Conveyor System (3 belts)				
B28	Dome Stockpile	1.13 Acres			
B29	Conveyor System (2 belts); Dome Bypass (alternate scenario)				
B34	Hopper Feeder				
B35	Hopper Bin				
B32	Conveyor Belt Drop				
B33	Conveyor Belt Drop				
<b>Truck Loading (Group 2a)</b>					
T01	Truck Loading				

EU	Description	Rating	Make	Model #	Serial #
<b>Boardline #1 Calcining Operation (Group #4)</b>					
D1	Belt Feeder Drop from Dome				
D2	Belt Feeder Drop from Dome				
D3	Belt Feeder Drop from Dome				
D4	Conveyor Belt Drop				
D43	Transfer Station Screen	180 tons/hr	FMC	65	D-801401
D44	Transfer Station Crusher	30 tons/hr	American Pulverizer	18x18	8133
D5	Variable Splitter				
D6	Bypass Conveyor				
D7	Conveyor Belt Drop				
D8	Tripper Station				
D9	Screw Conveyor				
D18	Screw Conveyor				
D27	Screw Conveyor				
D10	Rock Bin #1				
D11	Impeller Mill #1	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	
D13	Rock Bin #2				
D14	Impeller Mill #2	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	64017
D16	Rock Bin #3				
D17	Impeller Mill #3	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	
D19	Rock Bin #4				
D20	Impeller Mill #4	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	84021
D22	Rock Bin #5				
D23	Impeller Mill #5	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	
D25	Rock Bin #6				
D26	Impeller Mill #6	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	
D28	Rock Bin #7				
D29	Impeller Mill #7	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	86003
D31	Rock Bin #8				
D32	Impeller Mill #8	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	86002
D34	Rock Bin #9				

EU	Description	Rating	Make	Model #	Serial #
D35	Impeller Mill #9	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	86054
D45	Rock Bin #14				
D46	Impeller Mill #14	25 tons/hr, 22.5 MMBtu/hr	TBD	83	TBD
D47	Rock Bin # 15				
D48	Impeller Mill #15	25 tons/hr, 22.5 MMBtu/hr	TBD	83	TBD
D36	Screw Conveyor System (6 screw conveyors)				
D42	Screw Conveyor				
<b>Boardline #1 Wallboard Manufacturing (Group #5)</b>					
E1	Stucco Elevator #1A				
E2	Screw Conveyor				
E3	Stucco Bin #1				
E4	Screw Conveyor				
E5	Entoleter Elevator				
E6	Transfer Point				
E7	Entoleter (Mill)	45 tons/hr	Entoleter, Inc	Series 27/40	5129
E8	Screw Conveyor				
E9	Screw Conveyor				
E10	Stucco Elevator #1				
E11	Screw Conveyor				
E12	Stucco Bin #2				
E13	Rotary Valve				
E14	Bin #2 Discharge Screw				
E15	Transfer Point				
E16	Scalping Screw				
E17	Scale (Transfer Point)				
E18	Return Screw				
E19	Stucco Recirculating Elevator				
E20	Bin Recirculation Screw				
E21	Rotary Valve				
E22	Live Bottom Bin				
E23	Metering Screw Conveyor				
E23a	Line #1 Paper Heater	4.625 MMBtu/hr	Style B Linoflame Burners		60693
E25	Accelerator Bin				
E26	Feeder				
E27	Additive Bin				
E27a	Additive Bin/Feeder		Acrision	BDF1.5-GG/2	05467-01

EU	Description	Rating	Make	Model #	Serial #
E29	Additive Bin				
E31	Additive Bin				
E33	Additive Bin				
E28	Feeder				
E30	Feeder				
E32	Feeder				
E34	Feeder				
E43	Feeder				
E24	Mixing Screw Conveyor				
E35	Mixer	90 tons/hr	Broder Machine	5750	8150
E37	End Saw				
E37a	End Saw Bunker/Disposal		Fabricated On-site		
E39	Coe Board Dryer	110 MMBtu/hr			
E40	Printing and Other VOC-Containing Materials				
E41	Dunnage/Slutter system		Sweetwater Machine and Welding		
E42	Cutback Saw Process		Fabricated On-site		
<b>Accelerator System (Group #6)</b>					
F1	Screw Conveyor				
F2	Vacuum Feed				
F3	Storage Bin				
F4	Storage Bin				
F5	Crusher	6 tons/hr	Mikropulverizer	44	
F6	Screw Conveyor				
F7	Ball Mill	1 tons/hr	Service Welding and Machine	3x19	
F8	Elevator Conveyor				
<b>Boardline #2 Calcining Operations (Group #7)</b>					
G1	Screw Conveyor Drop				
G12	Screw Conveyor Drop				
G2	Rock Bin #10				
G3	Impeller Mill #10–Aggregate	19 MMBtu/hr	Alston	83	97036
G4	Double Cone Classifier				
G5	Cyclone Collector				
G7	Rock Bin #11				
G8	Impeller Mill #11	19 MMBtu/hr	Alston	83	97037
G9	Double Cone Classifier				
G10	Cyclone Collector				
G13	Rock Bin #12				
G14	Impeller Mill #12	22.5 MMBtu/hr	Alston	83	93019



EU	Description	Rating	Make	Model #	Serial #
G15	Double Cone Classifier				
G16	Cyclone Collector				
G18	Rock Bin #13				
G19	Impeller Mill #13	22.5 MMBtu/hr	Alston	83	93020
G20	Double Cone Classifier				
G21	Cyclone Collector				
G6	Feed Screw Conveyor Drop				
G11	Feed Screw Conveyor Drop				
G17	Feed Screw Conveyor Drop				
G22	Feed Screw Conveyor Drop				
<b>Boardline #2 Wallboard Manufacturing (Group #8)</b>					
H1	Stucco Storage Bin #3				
H2	Stucco Storage Bin #4				
H3	Stucco Screw Conveyor				
H4	Stucco Bucket Elevator				
H5	Recirculating Screw Conveyor				
H7	Stucco Feed Elevator				
H8	Stucco Metering				
H6	Stucco Surge Bin				
H11	Additive Bin				
H11a	Additive Bin/Feeder				
H13	Additive Bin				
H15	Additive Bin				
H19	Additive Bin				
H17	Accelerator Bin				
H12	Feeder				
H14	Feeder				
H16	Feeder				
H18	Feeder				
H20	Feeder				
H37	Feeder				
H20a	Line #2 Paper Heater	5.25 MMBtu/hr	Style B Linoflame Burners		51838
H10	Mixing Screw Conveyor				
H22	Pin Mixer		Broeder Machine Works	8600	
H24	End Saw				
H26	Flakt Board Dryer Combustion, All Zones	87.32 MMBtu/hr	ABB Flakt		
H27	Stucco Storage Bin #5				
H28	Stucco Screw Conveyor				

EU	Description	Rating	Make	Model #	Serial #
H29	Recirculating Screw Conveyor				
H30	End Saw				
H32	Flakt Board Dryer Combustion Zone 1	45 MMBtu/hr	ABB Flakt		
	Combustion Zone 2	45 MMBtu/hr			
	Combustion Zone 3	30 MMBtu/hr			
H33	Stucco Cooler		Gyptech	GKL52690	PALV-0940-ER6565
H34	Stucco Screw Conveyor				
H35	Stucco Screw Conveyor				
H36	Printing and Other VOC-Containing Materials				
<b>Cooling Towers (Group #9)</b>					
I01	Cooling Tower	1,200 gpm	Evapco	ATW207C	988659W
I02	Cooling Tower	1,200 gpm	Evapco	ATW207C	988659W
I03	Cooling Tower	3,495 gpm	Baltimore Aircoil	3473A-2	U054003201
<b>Storage Tank/GDO (Group #10)</b>					
J01	Aboveground Storage Tank; Regular Gasoline	10,000 gallons			
<b>Reclaim/Reuse Process (Group #11)</b>					
K01	Screw Grinder		ACTA Recycling	AR-GS-6	001612021
K02	Perforated Screw Conveyor		Martin Screw		
K04	Belt Conveyor	20 tons/hr			
K05	Roller Mill	19.2 tons/hr	Antenore Visentin	RO12C	115-12
K06	Vibratory Screen	19.2 tons/hr			
K07	Conveyor System (3 belts)				
K10	Storage Bin				
K11	Screw Conveyor System (3 conveyors)				
<b>Pumps (Group #12)</b>					
U03	Diesel-Powered Water Pump; DOM: 2012	464 hp	Cummins	QSL9- G7NR3	L120435661
U04	Diesel-Powered Fire Pump; DOM: 2007	240 hp	John Deere	6068HF120	PE60684683402
U05	Diesel-Powered Fire Pump; DOM: 2007	240 hp	John Deere	6068HF120	CD6068B020341
U06	Diesel-Powered Water Pump; DOM: 2002	85 hp	Perkins	1004-42	AR36677
<b>Stockpiles and Haul Roads</b>					
M1	Stockpiles	88.87 Acres			

EU	Description	Rating	Make	Model #	Serial #
K14	Haul Road; Unpaved	14.2 VMT/hr			
	Haul Road; Paved	2.3 VMT/hr			

## 1.2 INSIGNIFICANT ACTIVITIES

The units in Table 1-2 are present at this source, but are insignificant activities pursuant to AQR 12.5.2.5. The emissions from these units or activities, when added to the PTE of the source, will not make the source major for any additional pollutant.

**Table 1-2: Summary of Insignificant Activities**

Description
Aboveground Storage Tank; Diesel; 10,000 gallons
Aboveground Storage Tanks (2); Diesel; 1,000 gallons
Aboveground Storage Tanks (2); Diesel; 300 gallons
Aboveground Storage Tank; Diesel; 550 gallons

## 1.3 NONROAD ENGINES

Pursuant to Title 40, Part 1068.30 of the Code of Federal Regulations (40 CFR Part 1068.30), nonroad engines that are portable or transportable (i.e., not used on self-propelled equipment) shall not remain at a location for more than 12 consecutive months; otherwise, the engine(s) will constitute a stationary reciprocating internal combustion engine (RICE) and be subject to the applicable requirements of 40 CFR Part 63, Subpart ZZZZ; 40 CFR Part 60, Subpart IIII; and/or 40 CFR Part 60, Subpart JJJJ. Stationary RICE shall be permitted as emission units upon commencing operation at this stationary source.

Records of location changes for portable or transportable nonroad engines shall be maintained, and shall be made available to the Control Officer upon request. These records are not required for engines owned and operated by a contractor for maintenance and construction activities as long as records are maintained demonstrating that such work took place at the stationary source for periods of less than 12 consecutive months.

Nonroad engines used on self-propelled equipment do not have this 12-month limitation or the associated recordkeeping requirements.

## 2.0 CONTROLS

### 2.1 CONTROL DEVICES

- The permittee shall operate each control device at all times the affected emission unit is operating, as indicated in Table 2-1. [AQR 12.5.2.6]

**Table 2-1: Summary of Add-On Control Devices**

EU	Device Type	Manufacturer	Model #	Serial #	Pressure Drop (inch/H <sub>2</sub> O)	Pollutant
B25, K04-K07	Baghouse 1	General Combustion	UFI-70	14005	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
B35, D43, D44, D1, D2, D3, D4, K11	Baghouse 2	SLY	STJ-5617-12	RP6-1055	1.0 – 6.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
B36	Baghouse 3	Gencor	CFS225	225BH155898-07-NA	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
K01, K02	Baghouse 4	Mikropul	121S-8-20-TRC	990141111GA	1.0 – 12.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D7, D8, D9, D10, D13, D16, D18, D19, D22, D25, D27 D28, D31, D34, D45, D47, G2, G7, G13 and G18	Baghouse 5	Buell Norblo			1.0 – 6.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D11	Baghouse 6	Pulse Air	Ultra Jet #50		1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D14	Baghouse 7	Pulse Air	Ultra Jet #50	64017	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D17	Baghouse 8	Pulse Air	Ultra Jet #50		1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D20	Baghouse 9	Pulse Air	Ultra Jet #50	84021	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D23	Baghouse 10	Pulse Air	Ultra Jet #50		1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D26	Baghouse 11	Pulse Air	Ultra Jet #50		1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D29	Baghouse 12	Mikro Pulsaire	Ultra Jet #50	86003	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D32	Baghouse 13	Mikro Pulsaire	Ultra Jet #50	86002	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D35	Baghouse 14	Mikro Pulsaire	Ultra Jet #50	86054	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D46	Baghouse	TBD	TBD	TBD	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D48	Baghouse	TBD	TBD	TBD	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
D36, D42, E1, E2, E3	Baghouse 15	Rayjet	6T100-46T		1.0 – 6.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
E10–E20	Baghouse 16	Wheelabrator-Frye	84	48	1.0 – 6.0"	PM <sub>10</sub> /PM <sub>2.5</sub>

EU	Device Type	Manufacturer	Model #	Serial #	Pressure Drop (inch/H <sub>2</sub> O)	Pollutant
E4–E9, E21–E23, E24–E35, E37, E37a, E41, E42	Baghouse 17	Hosokawa Mikropul	25S8-20	980009H1	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
G1, G6, G11, G12, G17, G22, H1	Baghouse 18	Mikro Pulsaire	255-8-30	98095112	1.0 – 6.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
G3–G5	Baghouse 19	CP Environmental	144TNFW 465C	97036	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
G8–G10	Baghouse 20	CP Environmental	144TNFW 465C	97037	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
G14–G16	Baghouse 21	CP Environmental	144TNFW 465C	3019	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
G19–G21	Baghouse 22	CP Environmental	144TNFW 465C	3020	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
H2–H5	Baghouse 23	Mikro Pulse Air	255-8-30	980095111	1.0 – 6.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
H6, H7, H8, H10–H20, H22, H24	Baghouse 24	Hosokawa Mikropul	25S8-20	980009H2	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>
K10, H27–H29	Bin Vent					PM <sub>10</sub> /PM <sub>2.5</sub>
H30	Baghouse 25	Hosokawa Mikropul	25S8-20	860106H1	1.0 – 9.0"	PM <sub>10</sub> /PM <sub>2.5</sub>

## 2.2 CONTROL REQUIREMENTS

### *Mineral Processing and Wallboard Manufacturing*

1. The permittee shall not allow the silt loading on haul roads to exceed 0.33 ounces per square foot, as determined by AQR 93.4.1 [NSR ATC/OP, Modification 6, Revision 1, Condition III-B-2-e (08/12/04)]
2. The permittee shall monitor the moisture content of the gypsum raw material and apply wet suppression, as needed, to the primary crusher (EU: B2) to control PM emissions within allowable opacity limits during the processing of material. [AQR 12.5.2.6(a)]
3. The permittee shall maintain partial enclosures to achieve a minimum rated particulate control efficiency of 90% for dome stockpile, variable splitter and the bypass conveyor (EUs: B28, D5, and D6). [AQR 12.5.2.6(a)]
4. The permittee shall maintain full enclosures so as to achieve the rated particulate control efficiency of 100% for the accelerator system (EUs: F1, F2, F3, F4, F5, F6, F7, and F8). [AQR 12.5.2.6(a)]

5. The permittee shall achieve a minimum particulate control efficiency of 99.5% with each of the baghouses listed in Table 2-1. *[AQR 12.5.2.6(a)]*
6. The permittee shall maintain an effective seal around each of the baghouses. *[NSR ATC/OP Modification 6, Revision 1, Condition III-B-2-k (08/12/04)]*
7. The permittee shall maintain the pressure drop across each baghouse within the limits listed in Table 2-1 unless specified differently by the baghouse manufacturer's operation and maintenance guidelines. A copy of the manufacturer's limits shall be posted near the gauge for reference at any time by the Control Officer or appropriate representative. *[NSR ATC/OP Modification 6, Revision 1, Condition III-B-2-k (08/12/04)]*
8. The permittee shall use baghouses to control particulate emissions from each emission unit, as identified in 2-1, at all times the processing equipment is operating. *[NSR ATC/OP, Modification 6, Revision 1, Condition III-B-2-j (08/12/04) & AQR 12.5.2.6(a)]*

### Cooling Towers

9. The permittee shall operate each of the cooling towers with drift eliminators that have a manufacturer's maximum drift rate of 0.001% (EUs: I01, I02, and I03). *[AQR 12.5.2.6(a)]*
10. The permittee shall limit the TDS content of each cooling tower's circulation water to 6,000 parts per million (EUs: I01, I02, and I03). *[NSR ATC Modification 8, Revision 0, Condition III-B-2(m) (02/26/2007)]*
11. The permittee shall operate and maintain each of the cooling towers in accordance with the manufacturer's specifications (EUs: I01, I02, and I03). *[AQR 12.5.2.6(a)]*

### Gasoline Dispensing (EU: J01)

12. The permittee shall implement control technology requirements on gasoline dispensing equipment as follows: *[40 CFR Part 63, Subpart CCCCCC & Nevada SIP Rule 52 (7/24/1979)]*
  - a. The permittee shall not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Preventative measures to be taken include, but are not limited to, the following: *[40 CFR Part 63.11116]*
    - i. Minimize gasoline spills.
    - ii. Clean up spills as expeditiously as practicable.
    - iii. Cover all open gasoline containers and all gasoline storage tank fill pipes with a gasketed seal when not in use.
    - iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
    - v. Only load gasoline into storage tanks using a submerged fill tube where the greatest distance from the bottom of the storage tank to the point of the fill tube opening is no more than six inches. *[NV SIP Rule 52 (7/24/1979)]*

- b. The permittee shall install, maintain, and operate a Phase I vapor recovery system on all storage tanks that meets the following requirements: *[NV SIP Rule 52 (7/24/1979)]*
  - i. The Phase I vapor recovery system shall be rated with at least 90.0% control efficiency when in operation. This system shall be certified by an industry-recognized certification body, i.e., California Air Resources Board (CARB) or equivalent.
  - ii. All Phase I vapor recovery equipment shall be installed, maintained, and operated in accordance with the manufacturer's specifications and certification requirements.
  - iii. The vapor line from the gasoline storage tank to the gasoline cargo tank shall be vapor-tight.
  - iv. The vapor line from the gasoline storage tank to the gasoline cargo tank shall be at least 76 mm (3 inches) in nominal diameter.
  - v. The gasoline cargo tank shall be designed and maintained in a vapor-tight condition.

### Internal Combustion Engines

13. The permittee shall operate and maintain each emergency fire pump and water pump in accordance with the manufacturer's specifications (EUs: U03, U04, U05, and U06). *[NSR ATC Modification 11, Revision 0, Condition IV-B-2(c) (12/18/2009)]*
14. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35% by volume in the diesel-powered water pump (EU: U03) and each diesel-powered fire pump (EUs: U04 and U05). *[40 CFR 60.4207(b)]*
15. The permittee shall maintain the diesel water pump engine (EU: U06) as follows, unless the manufacturer's specifications are more stringent: *[40 CFR Part 63.6603(a)]*
  - a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first;
  - b. Inspect air cleaners every 1,000 hours of operation or annually, whichever comes first; and
  - c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
16. The permittee shall at all times operate and maintain the diesel water pump engine, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the EPA Administrator, which may include, but not be limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspections of the source (EU: U06). *[40 CFR Part 63.6605(b)]*

17. The permittee shall minimize the diesel water pump engine time spent at idle during startup, and minimize all engines' startup time to a period needed for appropriate and safe loading of the engine—not to exceed 30 minutes—after which the emission standards that apply at all times other than startup will kick in (EU: U06). *[40 CFR Part 63.6625(h)]*

Blasting [AQR 12.5.2.6(a), AQR 40.1, AQR 41.1 ]

18. Blasting shall not be performed when the National Weather Service forecasts wind gusts above 25 mph. Document current and predicted weather conditions, as provided by the National Weather Service, before setting explosive charges in holes. If the current forecast is for wind gusts of 25 mph or more, or winds are forecasted to be 25 mph or more within the next 24 hours, blasting shall be prohibited (EU: A5). *[AQR 12.5.2.6(a)]*
19. Blasting shall not occur within 1,500 feet of a residential area, occupied building, or major roadway when the wind direction is toward these areas (EU: A5). *[AQR 12.5.2.6(a)]*
20. Blasting shall be conducted in a manner designed to facilitate a continuous process, with the blast fired as soon as possible following the completion of loading. If blasting a loaded round may be delayed for more than 72 hours, the permittee shall notify the appropriate Mine Safety and Health Administration district office (EU: A5). *[AQR 12.5.2.6(a)]*

Stockpiles

21. The permittee shall install and maintain a 200' x 200' BTL-20 scrim reinforced polyethylene lining which will cover the entire reserve stockpile no later than March 17, 2021 (part of EU: M1, located to the south of the dome stockpile EU: B28). *[November 19, 2020 Hearing Officer Order]*
22. The permittee shall ensure the polyethylene cover for the reserve stockpile is in place and maintained in good working order at all times, except when personnel are actively working the pile, and only in those areas being worked *[November 19, 2020 Hearing Officer Order]*
23. The permittee shall provide employee training on safe access to the reserve stockpile, safe coverage of the stockpile, and proper maintenance of the polyethylene covering. *[November 19, 2020 Hearing Officer Order]*
24. The permittee shall generate an SOP for the operation, maintenance, and replacement of the polyethylene cover for the reserve stockpile which shall be kept onsite at all times and available for inspection purposes. *[November 19, 2020 Hearing Officer Order]*



### 3.0 LIMITATIONS AND STANDARDS

#### 3.1 OPERATIONAL LIMITS

- The permittee shall limit each operation to the throughputs listed in Table 3-1 of this permit in any consecutive 12-month period. [NSR ATC/OP Modification 6, Revision 0, Condition III-A-1(03/26/04), NSR ATC (01/31/2023), Significant Revision Application (12/06/2022), Minor Revision Application (10/03/2022), & AQR 12.5.2.6(a)]

**Table 3-1. Operational Limitations**

Operation	EU	Description	Annual Throughput
Quarry—Group 1	A1	Material Loading	2,300,000 tons
	A5	Blasting	58 blasts
			Disturbed Area: 50,000 ft <sup>2</sup> per blast
			750 tons (ANFO)
			90 tons (emulsion)
			14 tons (high explosive)
Drilling	10,000 holes		
Beneficiation—Group 2	B2	Primary Crusher	2,300,000 tons
Calcining Line #1— Group 4	D1, D2, D3	Belt Feeder Drops	2,300,000 tons total
	D11, D14, D17, D20, D23, D26, D29, D32, D35	Impeller Mills #1 - 9,	368,001 tons aggregate (combined total)
	D46, D48	Impeller Mills #14 & 15	580,000 tons (combined total)
	D36 and D42 (individually or combined)	Screw Conveyors	331,200 tons (each unit)
Wallboard Line #1— Group 5	E3	Stucco Bin #1	331,200 tons
	E12	Stucco Bin #2	397,440 tons
	E17	Scale (Transfer Point)	66,240 tons
	E22	Live Bottom Bin	397,440 tons
	E25	Accelerator Bin	1,197 tons
	E27, E27a, E29, E31, E33	Additive Bins	8,346 tons (each)
	E35	Mixer	450,000 tons
	E37	End Saw	450,000,000 ft <sup>2</sup>
E37a	End Saw Bunker Disposal Process	10,000 tons	

Operation	EU	Description	Annual Throughput
	E39	Coe Board Dryer	1,950,370 tons exhaust gas from NCA
	E40	Inks and Additives (Printing and Alpha Foamer)	400 pounds black ink
			500 pounds make-up ink
			270,000 pounds alpha foamer
			283,200 pounds silicone
	E41	Dunnage/slutter system	36,000,000 square board feet
E42	Cutback saw process	2,750,000 square board feet	
Accelerator—Group 6	F3, F4	Storage Bins	10,000 tons (combined total)
	F5	Crusher	10,000 tons
Calcining Line #2—Group 7	G1	Screw Conveyor	452,000 tons
	G12	Screw Conveyor	580,000 tons
	G3, G8	Impeller Mills #10-#11	452,000 tons (combined total)
	G14, G19	Impeller Mills #12-#13	580,000 tons (combined total)
Wallboard Line #2—Group 8	H1, H2	Stucco Bins #3 and #4	516,000 tons (each)
	H6	Stucco Surge Bin	1,032,000 tons
	H11, H11a, H13, H15, H19	Additive Bins	119,500 tons (each)
	H17	Accelerator Bin	8,803 tons
	H22	Pin Mixer	1,683,332 tons
	H24, H30	End Saws	650,000,000 ft <sup>2</sup> (each)
	H26	Flakt Dryer #2	764,923.2 MMBtu
	H27	Stucco Storage Bin #5	580,000 tons
	H33	Stucco Cooler	1,032,000 tons
	H36	Inks and Additives (Printing and Alpha Foamer)	500 pounds black ink
390,000 pounds alpha foamer			
188,800 pounds silicone			
Storage Tanks—Group 10	J01	GDO	22,000 gallons

- The permittee shall limit the total area of stockpiles throughout the gypsum product operation (EU: M1) to 88.87 acres. [AQR 12.5.2.6(a)]
- The permittee shall limit the total area for the dome stockpile (EU: B28) to 1.13 acres. [AQR 12.5.2.6(a)]
- The permittee shall limit the VMT on unpaved roads (EU: K14) to 72,550 miles in any consecutive 12-month period. [AQR 12.5.2.6(a)]
- The permittee shall limit the VMT on paved roads (EU: K14) to 19,909 miles in any consecutive 12-month period. [AQR 12.5.2.6(a)]

6. The permittee shall limit the operation of each fire pump for testing and maintenance purposes to 100 hours/year. The permittee may operate each fire pump up to 50 hours/year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance (EUs: U04 and U05). *[40 CFR Part 60.4211]*
7. The permittee shall limit the operation of the water pump (EU: U03) to 6,200 hours in any consecutive 12-month period. *[NSR ATC Modification 11, Revision 0, Section IV-B-2(b) (12/18/09)]*
8. The permittee shall limit the operation of the water pump (EU: U06) to 800 hours in any consecutive 12-month period. *[AQR 12.5.2.6(a)]*

### 3.2 EMISSION LIMITS

1. The permittee shall not allow the actual emissions from each emission unit to exceed the PTE listed in Table 3-2 in any consecutive 12-month period, except for emission units intended only for use in emergencies. *[NSR ATC/OP Modification 7, Revision 0, Section II-B (5/25/05); NSR ATC/OP Modification 8, Revision 0, Section II-A (02/26/07); NSR ATC/OP Modification 9, Revision 0, Section III-A (11/07/07); NSR ATC Modification 11, Revision 0, Section IV-A (12/18/09); Renewal application (3/6/2018); Revision application (2/2/2021); NSR ATC (01/31/2023); Significant Revision Application (12/06/2022); Minor Revision Application (10/03/2022); & AQR 12.5.2.6]*

**Table 3-2: Emission Unit PTE (tons per year)**

EU	Condition <sup>1</sup>	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP	GHG <sup>2</sup>
A1	2,300,000 tons/yr	0.11	0.02	0	0	0	0	0	0
A5	10,000 holes/yr	3.40	0.20	0	0	0	0	0	0
	58 blasts/yr	2.36	0.14	0	0	0	0	0	0
	750 tons/yr (ANFO)	0	0	4.70	16.55	0.84	0	0	0.41
B1	2,300,000 tons/yr	0.05	0.01	0	0	0	0	0	0
B2	2,300,000 tons/yr	0.62	0.09	0	0	0	0	0	0
B3	2,300,000 tons/yr	0.26	0.04	0	0	0	0	0	0
B37	2,300,000 tons/yr	0.05	0.01	0	0	0	0	0	0
S07	2,300,000 tons/yr	Included w/B40		0	0	0	0	0	0
B40	2,300,000 tons/yr	2.53	0.17	0	0	0	0	0	0
B42	2,300,000 tons/yr	0.05	0.01	0	0	0	0	0	0
B41	2,300,000 tons/yr	0.62	0.09	0	0	0	0	0	0
S13	2,300,000 tons/yr	0.05	0.01	0	0	0	0	0	0
B25	2,300,000 tons/yr	0.02	0.01	0	0	0	0	0	0
B28	1.13 Acres	0.03	0.01	0	0	0	0	0	0
B29	2,300,000 tons/yr	Included w/B25		0	0	0	0	0	0
B34	2,300,000 tons/yr	0.05	0.01	0	0	0	0	0	0
B35	2,300,000 tons/yr	0.01	0.01	0	0	0	0	0	0
B32	2,300,000 tons/yr	0.05	0.01	0	0	0	0	0	0
B33	2,300,000 tons/yr	Included w/B32		0	0	0	0	0	0

EU	Condition <sup>1</sup>	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP	GHG <sup>2</sup>
B36	2,300,000 tons/yr	11.53	1.76	14.89	57.33	0.22	1.03	0.71	46,168.92
T01	100,000 tons/yr	0.05	0.01	0	0	0	0	0	0
D1	766,667 tons/yr	0.01	0.01	0	0	0	0	0	0
D2	766,667 tons/yr	0.01	0.01	0	0	0	0	0	0
D3	766,667 tons/yr	0.01	0.01	0	0	0	0	0	0
D4	2,300,000 tons/yr	Included w/D43		0	0	0	0	0	0
D43	2,300,000 tons/yr	0.41	0.01	0	0	0	0	0	0
D44	262,800 tons/yr	0.01	0.01	0	0	0	0	0	0
D5	2,300,000 tons/yr	0.13	0.02	0	0	0	0	0	0
D6	2,300,000 tons/yr	0.13	0.02	0	0	0	0	0	0
D7	2,300,000 tons/yr	0.01	0.01	0	0	0	0	0	0
D8	2,300,000 tons/yr	0.01	0.01	0	0	0	0	0	0
D9	122,667 tons/yr	0.01	0.01	0	0	0	0	0	0
D18	122,667 tons/yr	0.01	0.01	0	0	0	0	0	0
D27	122,667 tons/yr	0.01	0.01	0	0	0	0	0	0
D10	40,889 tons/yr	0.01	0.01	0	0	0	0	0	0
D11	40,889 tons/yr	0.57	0.09	1.42	0.22	0.01	0.12	0.04	2,564.94
D13	40,889 tons/yr	0.01	0.01	0	0	0	0	0	0
D14	40,889 tons/yr	0.57	0.09	1.42	0.22	0.01	0.12	0.04	2,564.94
D16	40,889 tons/yr	0.01	0.01	0	0	0	0	0	0
D17	40,889 tons/yr	0.57	0.09	1.42	0.22	0.01	0.12	0.04	2,564.94
D19	40,889 tons/yr	0.01	0.01	0	0	0	0	0	0
D20	40,889 tons/yr	0.57	0.09	1.42	0.22	0.01	0.12	0.04	2,564.94
D22	40,889 tons/yr	0.01	0.01	0	0	0	0	0	0
D23	40,889 tons/yr	0.57	0.09	1.42	0.22	0.01	0.12	0.04	2,564.94
D25	40,889 tons/yr	0.01	0.01	0	0	0	0	0	0
D26	40,889 tons/yr	0.57	0.09	1.42	0.22	0.01	0.12	0.04	2,564.94
D28	40,889 tons/yr	0.01	0.01	0	0	0	0	0	0
D29	40,889 tons/yr	0.57	0.09	1.42	0.22	0.01	0.12	0.04	2,564.94
D31	40,889 tons/yr	0.01	0.01	0	0	0	0	0	0
D32	40,889 tons/yr	0.57	0.09	1.42	0.22	0.01	0.12	0.04	2,564.94
D34	40,889 tons/yr	0.01	0.01	0	0	0	0	0	0
D35	40,889 tons/yr	0.57	0.09	1.42	0.22	0.01	0.12	0.04	2,564.94
D45	8,760 hours/yr	0.01	0.01	0	0	0	0	0	0
D46	8,760 hours/yr	0.64	0.64	9.66	8.12	0.06	0.53	0.19	11,542.23
D47	8,760 hours/yr	0.01	0.01	0	0	0	0	0	0
D48	8,760 hours/yr	0.64	0.64	9.66	8.12	0.06	0.53	0.19	11,542.23
D36	55,200 tons/yr	0.02	0.01	0	0	0	0	0	0
D42	331,200 tons/yr	0.33	0.05	0	0	0	0	0	0
E1	331,200 tons/yr	0.02	0.01	0	0	0	0	0	0

EU	Condition <sup>1</sup>	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP	GHG <sup>2</sup>
E2	331,200 tons/yr	0.02	0.01	0	0	0	0	0	0
E3	331,200 tons/yr	0.02	0.01	0	0	0	0	0	0
E4	331,200 tons/yr	0.02	0.01	0	0	0	0	0	0
E5	331,200 tons/yr	0.02	0.01	0	0	0	0	0	0
E6	331,200 tons/yr	0.02	0.01	0	0	0	0	0	0
E7	331,200 tons/yr	0.01	0.01	0	0	0	0	0	0
E8	331,200 tons/yr	0.02	0.01	0	0	0	0	0	0
E9	331,200 tons/yr	0.02	0.01	0	0	0	0	0	0
E10	331,200 tons/yr	0.02	0.01	0	0	0	0	0	0
E11	331,200 tons/yr	0.02	0.01	0	0	0	0	0	0
E12	397,400 tons/yr	0.02	0.01	0	0	0	0	0	0
E13	397,400 tons/yr	0.02	0.01	0	0	0	0	0	0
E14	397,400 tons/yr	0.02	0.01	0	0	0	0	0	0
E15	397,400 tons/yr	0.02	0.01	0	0	0	0	0	0
E16	397,400 tons/yr	0.02	0.01	0	0	0	0	0	0
E17	66,240 tons/yr	0.01	0.01	0	0	0	0	0	0
E18	66,240 tons/yr	0.01	0.01	0	0	0	0	0	0
E19	66,240 tons/yr	0.01	0.01	0	0	0	0	0	0
E20	66,240 tons/yr	0.01	0.01	0	0	0	0	0	0
E21	397,400 tons/yr	0.02	0.01	0	0	0	0	0	0
E22	397,400 tons/yr	0.02	0.01	0	0	0	0	0	0
E23	397,400 tons/yr	0.02	0.01	0	0	0	0	0	0
E23a	8,760 hours/yr	0.15	0.15	2.47	3.00	0.01	0.11	0.04	2,372.57
E25	1,197 tons/yr	0.01	0.01	0	0	0	0	0	0
E26	1,197 tons/yr	0.01	0.01	0	0	0	0	0	0
E27	8,346 tons/yr	0.01	0.01	0	0	0	0	0	0
E27a	8,346 tons/yr	0.10	0.01	0	0	0	0	0	0
E29	8,346 tons/yr	0.01	0.01	0	0	0	0	0	0
E31	8,346 tons/yr	0.01	0.01	0	0	0	0	0	0
E33	8,346 tons/yr	0.01	0.01	0	0	0	0	0	0
E28	8,346 tons/yr	0.01	0.01	0	0	0	0	0	0
E30	8,346 tons/yr	0.01	0.01	0	0	0	0	0	0
E32	8,346 tons/yr	0.01	0.01	0	0	0	0	0	0
E34	8,346 tons/yr	0.01	0.01	0	0	0	0	0	0
E43	44 tons/yr	0.01	0.01	0	0	0	0	0	0
E24	450,000 tons/yr	0.03	0.01	0	0	0	0	0	0
E35	450,000 tons/yr	0.03	0.01	0	0	0	0	0	0
E37	450,000,000 ft <sup>2</sup> /yr	1.28	0.19	0	0	0	0	0	0
E37a	10,000 tons/yr	0.60	0.09	0	0	0	0	0	0
E39	8,760 hours/yr	6.60	6.55	76.65	253.55	2.63	7.49	2.69	56,428.69

EU	Condition <sup>1</sup>	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP	GHG <sup>2</sup>
E40	554,100 lbs/yr	0	0	0	0	0	24.88	0	0
E41	36,000,000 ft <sup>2</sup> /yr	0.62	0.09	0	0	0	0	0	0
E42	2,750,000 ft <sup>2</sup> /yr	0.01	0.01	0	0	0	0	0	0
F1	23,214 tons/yr	0	0	0	0	0	0	0	0
F2	23,214 tons/yr	0	0	0	0	0	0	0	0
F3	23,214 tons/yr	0	0	0	0	0	0	0	0
F4	23,214 tons/yr	0	0	0	0	0	0	0	0
F5	52,560 tons/yr	0	0	0	0	0	0	0	0
F6	23,214 tons/yr	0	0	0	0	0	0	0	0
F7	23,214 tons/yr	0	0	0	0	0	0	0	0
F8	23,214 tons/yr	0	0	0	0	0	0	0	0
G1	452,000 tons/yr	0.02	0.01	0	0	0	0	0	0
G12	580,000 tons/yr	0.03	0.01	0	0	0	0	0	0
G2	226,000 tons/yr	0.01	0.01	0	0	0	0	0	0
G3	226,000 tons/yr	4.08	1.45	8.32	1.75	0.05	0.44	0.15	9,746.78
G4	226,000 tons/yr	0.01	0.01	0	0	0	0	0	0
G5	226,000 tons/yr	0.01	0.01	0	0	0	0	0	0
G7	226,000 tons/yr	0.01	0.01	0	0	0	0	0	0
G8	226,000 tons/yr	4.08	1.45	8.32	1.75	0.05	0.44	0.15	9,746.78
G9	226,000 tons/yr	0.01	0.01	0	0	0	0	0	0
G10	226,000 tons/yr	0.01	0.01	0	0	0	0	0	0
G13	290,000 tons/yr	0.01	0.01	0	0	0	0	0	0
G14	290,000 tons/yr	4.70	1.33	13.80	8.28	0.06	0.54	0.20	11,542.23
G15	290,000 tons/yr	0.01	0.01	0	0	0	0	0	0
G16	290,000 tons/yr	0.01	0.01	0	0	0	0	0	0
G18	290,000 tons/yr	0.01	0.01	0	0	0	0	0	0
G19	290,000 tons/yr	4.70	1.33	13.80	8.28	0.06	0.54	0.20	11,542.23
G20	290,000 tons/yr	0.01	0.01	0	0	0	0	0	0
G21	290,000 tons/yr	0.01	0.01	0	0	0	0	0	0
G6	452,000 tons/yr	0.02	0.01	0	0	0	0	0	0
G11	452,000 tons/yr	0.02	0.01	0	0	0	0	0	0
G17	580,000 tons/yr	0.03	0.01	0	0	0	0	0	0
G22	580,000 tons/yr	0.03	0.01	0	0	0	0	0	0
H1	516,000 tons/yr	0.03	0.01	0	0	0	0	0	0
H2	516,000 tons/yr	0.03	0.01	0	0	0	0	0	0
H3	1,032,000 tons/yr	0.05	0.01	0	0	0	0	0	0
H4	1,032,000 tons/yr	0.05	0.01	0	0	0	0	0	0
H5	516,000 tons/yr	0.03	0.01	0	0	0	0	0	0
H7	1,032,000 tons/yr	0.05	0.01	0	0	0	0	0	0
H8	1,032,000 tons/yr	0.05	0.01	0	0	0	0	0	0

EU	Condition <sup>1</sup>	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP	GHG <sup>2</sup>
H6	1,032,000 tons/yr	0.05	0.01	0	0	0	0	0	0
H11	119,500 tons/yr	0.01	0.01	0	0	0	0	0	0
H11a	119,500 tons/yr	1.20	0.18	0	0	0	0	0	0
H13	119,500 tons/yr	0.01	0.01	0	0	0	0	0	0
H15	119,500 tons/yr	0.01	0.01	0	0	0	0	0	0
H19	119,500 tons/yr	0.01	0.01	0	0	0	0	0	0
H17	8,803 tons/yr	0.01	0.01	0	0	0	0	0	0
H12	119,500 tons/yr	0.01	0.01	0	0	0	0	0	0
H14	119,500 tons/yr	0.01	0.01	0	0	0	0	0	0
H16	119,500 tons/yr	0.01	0.01	0	0	0	0	0	0
H18	8,803 tons/yr	0.01	0.01	0	0	0	0	0	0
H20	119,500 tons/yr	0.01	0.01	0	0	0	0	0	0
H37	29 tons/yr	0.01	0.01	0	0	0	0	0	0
H20a	8,760 hours/yr	0.17	0.17	2.81	3.43	0.01	0.12	0.04	2,693.19
H10	1,638,332 tons/yr	0.08	0.01	0	0	0	0	0	0
H22	1,638,332 tons/yr	0.08	0.01	0	0	0	0	0	0
H24	650,000,000 ft <sup>2</sup> /yr	1.85	0.28	0	0	0	0	0	0
H26	764,923.2 MMBtu/yr	6.47	6.42	57.12	51.73	0.28	2.06	0.93	54,889.74
H27	580,000 tons/yr	0.03	0.01	0	0	0	0	0	0
H28	580,000 tons/yr	0.03	0.01	0	0	0	0	0	0
H29	580,000 tons/yr	0.03	0.01	0	0	0	0	0	0
H30	650,000,000 ft <sup>2</sup> /yr	1.85	0.28	0	0	0	0	0	0
H32	8,760 hours/yr	4.00	3.95	73.58	44.16	0.32	2.88	1.04	61,558.56
H33	1,032,000 tons/yr	0.05	0.01	0	0	0	0	0	0
H34	516,000 tons/yr	0.03	0.01	0	0	0	0	0	0
H35	516,000 tons/yr	0.03	0.01	0	0	0	0	0	0
H36	579,300 lbs/yr	0	0	0	0	0	33.12	0	0
I01	8,760 hours/yr	0.07	0.07	0	0	0	0	0	0
I02	8,760 hours/yr	0.07	0.07	0	0	0	0	0	0
I03	8,760 hours/yr	0.22	0.22	0	0	0	0	0	0
J01	22,000 gallons/yr	0	0	0	0	0	2.77	0.78	0
K01	175,200 tons/yr	0.01	0.01	0	0	0	0	0	0
K02	175,200 tons/yr	0.01	0.01	0	0	0	0	0	0
K04	168,192 tons/yr	0.01	0.01	0	0	0	0	0	0
K05	168,192 tons/yr	0.01	0.01	0	0	0	0	0	0
K06	168,192 tons/yr	0.01	0.01	0	0	0	0	0	0
K07	168,192 tons/yr	0.01	0.01	0	0	0	0	0	0
K10	168,192 tons/yr	0.01	0.01	0	0	0	0	0	0
K11	168,192 tons/yr	0.01	0.01	0	0	0	0	0	0

EU	Condition <sup>1</sup>	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAP	GHG <sup>2</sup>
U03	6,200 hours/yr	0.22	0.22	8.24	5.39	0.02	0.95	0.04	1,656.20
U04	500 hours/yr	0.03	0.03	0.43	0.08	0.01	0.03	0.01	69.09
U05	500 hours/yr	0.03	0.03	0.43	0.08	0.01	0.03	0.01	69.09
U06	800 hours/yr	0.07	0.07	0.49	0.22	0.01	0.02	0.01	39.14
K14	72,550 VMT/yr (Unpaved)	27.46	2.78	0	0	0	0	0	0
	19,909 VMT/yr (Paved)	1.51	0.23	0	0	0	0	0	0
M1	90 Acres	26.92	4.04	0	0	0	0	0	0

<sup>1</sup>The quantities in this column are not intended as enforceable permit limits unless stated otherwise in this permit.

<sup>2</sup>Expressed in units of CO<sub>2</sub>e.

2. Unless otherwise specified, the permittee shall not discharge any air contaminant into the atmosphere from any emission unit in excess of an average of 20% opacity for a period of more than six consecutive minutes. *[AQR 26.1]*
3. The permittee shall not exhibit fugitive emissions with an average opacity in excess of 10% based on the average of five 6-minute averages, in accordance with the procedures specified in EPA Method 9, from grinding mills, screening operations, bucket elevators, transfer points, belt conveyors, bagging operations, storage bins, enclosed truck, or any other affected facility (as defined in 40 CFR Parts 60.670 and 60.671) that commenced construction, modification, or reconstruction after August 31, 1983, but before April 22, 2008 (EUs: B1, B3, B37, S07, B40, B42, S13, B25, B29, B32, B33, D5, and D6). *[40 CFR Part 60.672, 40 CFR Part 60.675, 40 CFR Part 60.11 & AQR 12.5.2.6(d)]*
4. The permittee shall not exhibit fugitive emissions with an average opacity in excess of 7%, based on an average of five 6-minute averages, in accordance with the procedures specified in EPA Method 9, from grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, bagging operations, storage bins, enclosed truck or railcar loading stations, or any other affected facility (as defined under 40 CFR Parts 60.670 and 60.671) that commenced construction, modification, or reconstruction on or after April 22, 2008 (EU: K10). *[40 CFR Part 60.672, 40 CFR Part 60.675, 40 CFR Part 60.11 & AQR 12.5.2.6(d)]*
5. The permittee shall not exhibit fugitive emissions with an average opacity in excess of 15%, based on an average of five 6-minute averages, in accordance with the procedures specified in EPA Method 9, from crushers for which a capture system is not used that commenced construction, modification, or reconstruction after August 31, 1983, but before April 22, 2008 (EUs: B2 and B41). *[40 CFR Part 60.672, 40 CFR Part 60.675, 40 CFR Part 60.11 & AQR 12.5.2.6(d)]*
6. The permittee shall not discharge particulate matter emissions from the baghouse in excess of 0.05 g/dscm (0.022 gr/dscf) or an opacity greater than 7% from emission units that commenced construction, modification, or reconstruction after August 31, 1983, but before April 22, 2008 (EUs: B35, D1–D4, D7–D10, D13, D16, D18, D19, D22, D25, D27, D28, D31, D34, D36, D43, D44, E1–E23, E25–E27a, E29–E37a, G1, G2, G4–G7, G9–G13, G15–G18, G20–G22, H1–H8, H10–H20, H22, H24, H27–H30, and H33–H35). *[40 CFR Part 60.672 & 12.5.5.6(d)]*



7. The permittee shall not allow actual stack emissions from affected facilities (as defined by 40 CFR Parts 60.670 and 60.671) that commenced construction, modification, or reconstruction on or after April 22, 2008, for which a capture system is used to exceed a PM concentration of 0.032 g/dscm (0.014 gr/dscf) (EUs: K01, K02, K04–K07, and K11). *[40 CFR Part 60.672(a)]*
8. The permittee shall not discharge emissions from affected facilities (as defined by 40 CFR Parts 60.730 and 60.731) that exceed a PM concentration of 0.092 g/dscm (0.040 gr/dscf) (EUs: D11, D14, D17, D20, D23, D26, D29, D32, D35, D46, D48, G3, G8, G14, and G19). *[40 CFR Part 60.732(a)]*
9. The permittee shall not allow the discharge into the atmosphere of visible emissions from any stack in excess of 10% opacity based on an average of five 6-minute averages, in accordance with the procedures specified in EPA Method 9 (EUs: D11, D14, D17, D20, D23, D26, D29, D32, D35, D46, D48, G3, G8, G14, and G19). *[40 CFR Part 60.732(b)]*
10. The permittee shall not discharge visible emissions into the atmosphere from emission units specified in this document as fully enclosed (EUs: F1–F8). *[AQR 12.5.2.6(a)]*
11. The permittee shall not allow actual stack emissions from the dryer (EU: B36) to exceed a PM concentration in excess of 0.057 g/dscm (0.025 gr/dscf) or an opacity greater than 10%. *[40 CFR Part 60.732]*
12. The permittee shall not allow actual stack emissions from the dryer (EU: B36) to exceed the NO<sub>x</sub> and CO emission rates specified in Table 3-3 of this permit. *[NSR ATC/OP Modification 8, Table II-B-4b (2/26/07)]*
13. The permittee shall not allow actual stack emissions from the dryers (EUs: E39, H26, and H32) to exceed the NO<sub>x</sub>, CO, and VOC emission rates specified in Table 3-3 of this permit. *[NSR ATC/OP Modification 7, Tables II-B-7 and II-B-8 (2/26/07)]*
14. The permittee shall not allow actual stack emissions from the natural gas paper heaters (EUs: E23a and H20a) to exceed the PM<sub>10</sub>, NO<sub>x</sub>, CO, and VOC emission rates specified in Table 3-3 of this permit. *[Application for significant revision to Part 70 OP (12/10/2013)]*
15. The permittee shall maintain paved haul roads (EU: K14) so as to not discharge fugitive emissions into the atmosphere in excess of 10% opacity for a period(s) aggregating more than three minutes in any 60-minute period. *[NSR ATC/OP Modification 6, Revision 1, Condition III-B-2-d (08/12/04)]*

**Table 3-3. Emission Rates and Concentration Limits Summary**

EU	PM (gr/dscf)	NO <sub>x</sub> (lbs/hr)	CO (lbs/hr)	VOC (lbs/hr)
B25 & B35	0.022			
B36	0.025	3.60	13.86	
D1–D4, D7–D10, D13, D16, D18, D19, D22, D25, D27, D28, D31, D34, D36, D42, D43, D44	0.022			
D11, D14, D17, D20, D23, D26, D29, D32, D35, D46, D48	0.040			
E1–E35, E37	0.022			

<b>EU</b>	<b>PM (gr/dscf)</b>	<b>NO<sub>x</sub> (lbs/hr)</b>	<b>CO (lbs/hr)</b>	<b>VOC (lbs/hr)</b>
E23a	0.03 lb/hr	0.56	0.68	0.02
E39		17.50	57.89	1.71
G1, G6, G11, G12, G17, G22	0.022			
G3, G8, G14, G19	0.040			
G2, G4, G5	0.022			
G7–G10	0.022			
G13–G16	0.022			
G18–G21	0.022			
H20a	0.04 lb/hr	0.64	0.78	0.03
H1–H5, H7, H8, H27–H29, H33–H35	0.022			
H6, H10–H20, H22, H24	0.022			
H26		13.04	11.81	0.47
H30	0.022			
H32 (Zones 1 and 2)		6.30	3.78	0.25
H32 (Zone 3)		4.20	2.52	0.17
K01, K02, K04 – K07, K10, and K11	0.014			

---

## 4.0 COMPLIANCE DEMONSTRATION REQUIREMENTS

---

### 4.1 MONITORING

#### *Visible Emissions [AQR 12.5.2.6(d) & AQR 12.5.2.8]*

1. The Responsible Official shall sign and adhere to the *Visible Emissions Check Guidebook* and keep a copy of the signed guide on-site at all times.
2. The permittee shall conduct a daily visual emissions check of stack emissions from each baghouse while in operation. A single visible emissions check may include multiple units if there is no obstruction to the line of sight.
3. The permittee shall conduct a visual emissions check at least quarterly on the diesel-powered water pump (EU: U03) and each fire pump (EUs: U04, U05, and U06) while in operation.
4. If no plume appears to exceed the opacity standard during the visible emissions check, the date, location, and results shall be recorded, along with the viewer's name.
5. If a plume appears to exceed the opacity standard, the permittee shall do one of the following:
  - a. Immediately correct the perceived exceedance, then record the first and last name of the person who performed the emissions check, the date the check was performed, the unit(s) observed, and the results of the observation; or
  - b. Call a certified Visible Emissions Evaluation (VEE) reader to perform a U.S. Environmental Protection Agency (EPA) Method 9 evaluation.
    - i. For sources required to have a certified reader on-site, the reader shall start Method 9 observations within 15 minutes of the initial observation. For all other sources, the reader shall start Method 9 observations within 30 minutes of the initial observation.
    - ii. If no opacity exceedance is observed, the certified VEE reader shall record the first and last name of the person who performed the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each emission unit that was initially perceived to have exceeded the opacity limit, and the record shall also indicate:
      - (1) The cause of the perceived exceedance;
      - (2) The color of the emissions; and
      - (3) Whether the emissions were light or heavy.
    - iii. If an opacity exceedance is observed, the certified VEE reader shall take immediate action to correct the exceedance. The reader shall then record the first and last name of the person performing the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each reading identified, and the record shall also indicate:

- (1) The cause of the exceedance;
  - (2) The color of the emissions;
  - (3) Whether the emissions were light or heavy;
  - (4) The duration of the emissions; and
  - (5) The corrective actions taken to resolve the exceedance.
6. Any scenario of visible emissions noncompliance can and may lead to enforcement action.

*Mineral Processing and Wallboard Manufacturing/Recycling [AQR 12.5.2.6(d)]*

7. The permittee shall monitor the throughput of each emission unit listed in Table 3-1 to demonstrate compliance with operational limits on a consecutive 12-month basis.
8. The permittee shall monitor daily the free moisture content of the mined gypsum raw material during the processing of material.
9. The permittee shall perform visible emissions checks at all transfer point locations daily during processing of material, and investigate and correct any problems before resuming operations.

*Baghouses [AQR 12.5.2.6(d)]*

10. The permittee shall conduct daily monitoring of the pressure drop across each baghouse cell with the installation and operation of a pressure differential (Magnehelic) gauge per manufacturer's specifications.
11. The permittee shall conduct the following monthly external inspections of each baghouse while it is running to ensure that equipment is maintained in good working order and operated according to manufacturer's specifications:
  - a. Verification of the pulse timing sequence;
  - b. Verification that the cleaning system does not appear unusual, and that fans are running and do not exhibit unusual sounds or vibrations; and
  - c. Verification that seams, connections, and housings are sealed and leak-free, including walls, hoppers, ducting, and piping.
12. If an inspection shows that maintenance is necessary, the permittee shall schedule and complete such maintenance within five working days. If the malfunction renders the baghouse ineffective in controlling particulate emissions, material processing shall stop until repairs to the baghouse are completed.
13. The permittee shall visually inspect each baghouse interior at least annually to determine the internal mechanical integrity of the unit and spot any defects. Defective compartments shall be sealed off and repairs completed within five working days. If the malfunction renders the baghouse ineffective in controlling particulate emissions, material processing shall stop until repairs to the baghouse are completed.

14. The permittee shall have a standard operating procedures (SOP) manual for baghouses. The procedures specified in the manual for maintenance shall, at a minimum, include a preventative maintenance schedule that is consistent with the baghouse manufacturer's instructions for routine and long-term maintenance.

### Stockpiles and Haul Roads

15. The permittee shall monitor monthly the total area of stockpiles throughout the gypsum product operation (EU: M1). [AQR 12.5.2.6(d)]
16. The permittee shall conduct daily inspections of the polyethylene cover for the reserve stockpile and repair/replace the covering immediately if fugitive emissions are observed through tears or holes on the covering; [November 19, 2020 Hearing Officer Order]
17. The permittee shall monitor monthly the VMT on unpaved roads (EU: K14). [AQR 12.5.2.6(d)]
18. The permittee shall monitor monthly the VMT paved roads (EU: K14). [AQR 12.5.2.6(d)]
19. The permittee shall determine silt content from all unpaved haul roads at least once semi-annually when in operation, in accordance with AQR 91.4.1.2 (EU: K14). [NSR ATC/OP Modification 6, Revision 1, Condition III-E-11 (08/12/04)]
20. The Permittee shall determine silt loading from all paved haul roads at least once semi-annually when in operation, in accordance with AQR 93.4.1.2 (EU: K14). [NSR ATC/OP Modification 6, Revision 1, Condition III-E-12 (08/12/04)]

### Cooling Towers

21. The permittee shall monitor the TDS of the cooling tower recirculation water monthly using a conductivity meter or another device approved in advance by the Control Officer (EUs: I01, I02, and I03). [AQR 12.5.2.6(d)]

### Flakt Dryer #2

22. The permittee shall monitor the monthly heat input to the Flakt Dryer #2 (EU: H26) in MMBtu using either a fuel flow meter or a calculation method based on the amount of water evaporated. [AQR 12.5.2.6(d)]
23. If the permittee chooses to calculate the heat input based on the amount of water evaporated rather than direct measurement of fuel as provided in Condition 4.1.23 above, then the following monitoring procedures shall be followed: [AQR 12.5.2.6(d)]
  - a. The permittee shall monitor the monthly throughput of material processed through Flakt Dryer #2 (EU: H26) in msf.
  - b. The permittee shall conduct hourly moisture analysis by weighing the material at the inlet and outlet of the Flakt Dryer #2 (EU: H26) and calculate the evaporation rate in lbs/msf during production runs.

- c. The permittee shall calculate the amount of water evaporated monthly through Flakt Dryer #2 (EU: H26) and record it as pounds, based on the average monthly evaporation rate in lbs/msf.
- d. The permittee shall calculate the amount of fuel consumed monthly through Flakt Dryer #2 (EU: H26) using Gypsum Technologies Inc. guarantee of 1,470 BTU/lbs of water evaporated. The fuel consumption shall be recorded in units of MMBtu.

### Gasoline Dispensing

- 24. The permittee shall monitor the throughput of gasoline (EU: J01) and calculate the monthly total by dividing the total of the last 365 days of throughput by 12. [AQR 12.5.2.6(d)]
- 25. The permittee shall monitor the fuel storage and dispensing system to determine if the components of the system are in compliance with the control requirements of this permit. The monitoring shall consist of, but not be limited to: [AQR 12.5.2.6(d)]
  - a. Inspecting daily for gasoline spills, and recording the times and dates the source became aware of a spill and cleaned the spill up.
  - b. Inspecting covers on gasoline containers and fill pipes after each respective delivery, and recording the dates of fuel deliveries and corresponding inspections.
  - c. Recording the date and approximate volume of gasoline sent to open waste collection systems that collect recyclable gasoline.

### Internal Combustion Engines

- 26. The permittee shall monitor the sulfur content and cetane index or aromatic content of the fuel burned in the diesel-powered water pump (EU: U03) and each diesel-powered fire pump (EUs: U04 and U05) by retaining a copy of vendor fuel specifications. [40 CFR 60.4207(b)]
- 27. The permittee shall operate each emergency fire pump (EUs: U04 and U05) with a nonresettable hour meter and monitor the duration of operation for testing, maintenance, and nonemergency operation, and separately for emergencies. The nature of the emergency leading to emergency operation shall be documented. [AQR 12.5.2.6(d)]
- 28. The permittee shall ensure compliance with the provisions of 40 CFR Part 60, Subpart III in this permit by keeping records of engine manufacturer data indicating compliance with the standards (EUs: U03, U04, and U05). [40 CFR 60.4211(b) and AQR 12.5.2.6(d)]
- 29. The permittee shall operate each water pump (EU: U03 and U06) with a nonresettable hour meter and monitor its duration of operation in hours. [AQR 12.5.2.6(d)]

### Drilling and Blasting

- 30. The permittee shall monitor the number of holes drilled and calculate, on a monthly basis, as a consecutive 12-month total (EU: A5).
- 31. The permittee shall monitor the blasting area in square feet per each blast (EU: A5).

32. The permittee shall monitor the number of blast and calculate, on a monthly basis, as a consecutive 12-month total (EU: A5).
33. The permittee shall monitor the amount of ANFO, emulsion, and high explosive in tonnage and calculate, on a monthly basis, as a consecutive 12-month total (EU: A5).

Compliance Assurance Monitoring (CAM)

34. The permittee shall monitor the baghouses listed in Table 4-1 in accordance with 40 CFR Part 64 and other conditions in this section: *[40 CFR, Part 64 and AQR 12.5.2.6(d)]*

**Table 4-1: Emission Units Subject to CAM Requirements**

ID	Description	Control Method	Manufacturer	Model #	Serial No.
B36	Rotary Dryer #2	Baghouse 3	Gencor	CFS225	225BH155898- 07-NA
D11	Impeller Mill #1	Baghouse 6	Pulse Air	Ultra Jet #50	NA
D14	Impeller Mill #2	Baghouse 7	Pulse Air	Ultra Jet #50	64017
D17	Impeller Mill #3	Baghouse 8	Pulse Air	Ultra Jet #50	NA
D20	Impeller Mill #4	Baghouse 9	Pulse Air	Ultra Jet #50	84021
D23	Impeller Mill #5	Baghouse 10	Pulse Air	Ultra Jet #50	NA
D26	Impeller Mill #6	Baghouse 11	Pulse Air	Ultra Jet #50	NA
D29	Impeller Mill #7	Baghouse 12	Mikro Pulsaire	Ultra Jet #50	86003
D32	Impeller Mill #8	Baghouse 13	Mikro Pulsaire	Ultra Jet #50	86002
D35	Impeller Mill #9	Baghouse 14	Mikro Pulsaire	Ultra Jet #50	86054
E37	End Saw	Baghouse 17	Hosokawa Mikropul	25S8-20	980009H1
G3	Impeller Mill #10	Baghouse 19	CP Environmental	144TNFW 465C	97036
G8	Impeller Mill #11	Baghouse 20	CP Environmental	144TNFW 465C	97037
G14	Impeller Mill #12	Baghouse 21	CP Environmental	144TNFW 465C	3019
G19	Impeller Mill #13	Baghouse 22	CP Environmental	144TNFW 465C	3020
H24	End Saw	Baghouse 24	Hosokawa Mikropul	25S8-20	980009H2
H30	End Saw	Baghouse 25	Hosokawa Mikropul	25S8-20	860106H1

35. The permittee shall monitor the pressure differential for each baghouse subject to CAM listed in Table 4-1 in accordance with the monitoring requirements in Table 4-2.
36. The permittee shall monitor opacity from baghouses subject to CAM listed in Table 4-1 in accordance with the monitoring requirements listed in Table 4-2.

**Table 4-2. Monitoring Approach for Baghouses – PM<sub>10</sub> and Opacity**

CAM Element	Indicator 1	Indicator 2
Indicator	Pressure differential ( $\Delta p$ ).	Visible emissions (VE) for opacity.
Measurement Approach	The $\Delta p$ shall be measured across the baghouse with a magnehelic gauge or equivalent; the time of reading and measured value will be recorded.	VE shall be monitored at the baghouse stack exhaust and documented on a daily basis using EPA Method 22. A Method 9 opacity reading will be performed if visible emissions are observed.
Indicator Range	The indicator range for $\Delta p$ is defined for each baghouse in Table 2-1.	If the presence of visible emissions is observed during Method 22 test, a Method 9 test shall be conducted to demonstrate compliance with the opacity limit specified in Section 3.2 of this permit.
Excursion	An excursion is defined as a pressure drop outside of the operating parameters defined in Table 2-1. Excursions shall trigger an inspection, correction actions, and a reporting requirement.	An excursion is defined as the presence of visible emissions above the opacity limit. Excursions shall trigger an inspection, corrective actions, and a reporting requirement. The equipment will be shut down until repairs are made.
QIP Thresholds	More than six excursions within a semiannual reporting period.	More than six excursions within a semiannual reporting period.
Performance Criteria Data Representativeness	Pressure taps are located on the high- and low-pressure sides of the bag filters. A differential pressure gauge measures and displays the $\Delta p$ with a minimum accuracy of $\pm 0.25''$ of water column.	Observations are made at the baghouse exhaust.
QA/QC Practices and Criteria	The $\Delta p$ gauge shall be installed, calibrated, and maintained per manufacturer's recommendations.	The VE observer will be familiar with baghouse operations, visible emissions, and EPA Method 22. The Method 9 opacity observations shall be made by a certified observer.
Monitoring Frequency	Daily $\Delta p$ measures shall be made.	Daily VE checks shall be made.
Data Collection Procedures	$\Delta p$ measurements shall be recorded upon observation.	The VE observation is documented by the observer and recorded daily.
Averaging Period	Not applicable.	VE checks are 6 minutes duration. Method 9 is one 6-minute average.

## 4.2 TESTING

- At the Control Officer's request, the permittee shall test (or have tests performed) to determine emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of those allowed by the AQRs is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice. The Control Officer may observe the testing. All tests shall be conducted by reputable, qualified personnel. [AQR 4.2]



2. At the Control Officer's request, the permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. [AQR 4.2]
3. The permittee shall submit to the Control Officer for approval a performance testing protocol that contains testing, reporting, and notification schedules, test protocols, and anticipated test dates no less than 45 days, but no more than 90 days, before the anticipated date of the performance test unless otherwise specified in this permit. [AQR 12.5.2.8]
4. The permittee shall submit to EPA for approval any alternative test methods EPA has not already approved to demonstrate compliance with a requirement under 40 CFR Part 60. [40 CFR Part 60.8(b)]
5. Performance testing is subject to 40 CFR Part 60.8 (as amended), Subpart A, and *Clark County Department of Air Quality Guideline for Source Testing (9/19/2019)*. Performance testing shall be the instrument for determining initial and subsequent compliance with the emission limitations set forth in Tables 3-3 of this permit. [AQR 12.5.2.8(a)]

### Board Dryers

6. The permittee shall conduct and pass performance tests for NO<sub>x</sub>, CO, and VOC emission rates from the Coe and Flakt board dryers (EUs: E39, H26, and H32) according to the following conditions: [NSR ATC/OP Modification 7, Revision 1, Conditions III-E-1 and III-E-4 (05/25/05) & AQR 12.5.2.6(d)]
  - a. The permittee shall conduct performance testing at each zone stack outlet.
  - b. The permittee shall conduct performance testing according to the applicable methods specified in Table 4-3.
  - c. The permittee conducted and passed an initial performance test on Flakt Dryer #2 (EU: H26) on June 9, 2022, which demonstrated compliance with the revised emission factors.
  - d. The permittee shall conduct and pass subsequent performance tests on the Coe and Flakt board dryers (EUs: E39, H26, and H32) every five years, and no later than 90 days after the anniversary date of the previous successful test.
7. The permittee shall conduct performance testing for NO<sub>x</sub> and CO emission rates from the rotary dryer (EU: B36) according to the following conditions: [NSR ATC/OP Modification 7, Conditions III-E-1 and III-E-4 (05/25/05) & AQR 12.5.2.6(d)]
  - a. The permittee shall conduct performance testing at each stack outlet.
  - b. The permittee shall conduct performance testing according to the applicable methods specified in Table 4-3.
  - c. Subsequent performance testing shall be conducted every five years, and no later than 90 days after the anniversary date of the last performance test.

**Table 4-3. Performance Testing Methods for Combustion Emissions**

Pollutant	Test Method
NO <sub>x</sub>	EPA Method 7E
CO	EPA Method 10
VOC	EPA Method 18 or 25a
Stack Gas Parameters	EPA Methods 1, 2, 3 or 4

Opacity

8. The permittee shall conduct performance testing for opacity standards on all emission units subject to 40 CFR Part 60, Subpart UUU (EUs: B36, D11, D14, D17, D20, D23, D26, D29, D32, D35, D46, D48, G3, G8, G14, and G19) according to the following conditions: *[AQR 12.5.2.6(d), 40 CFR Part 60.736(b)(2)]*
  - a. Opacity testing shall be conducted in accordance with EPA Test Method 9 and the procedures in 40 CFR Parts 60.8, 60.11, and 60.736, as applicable.
  - b. Initial performance testing for opacity shall be conducted on all affected emission units in accordance with 40 CFR Part 60.8(a). Initial performance tests shall be conducted within 60 days of achieving the maximum production rate at which the source will be operated, but no later than 180 days after initial startup (EUs: D46 & D48).
  - c. Subsequent performance testing for opacity shall be conducted upon written notification from the Control Officer.
  
9. The permittee shall conduct performance testing for opacity standards on all emission units subject to 40 CFR Part 60, Subpart OOO (EUs: B3, B37 S07, B40, B42, B41, S13, B25, B29, B34, B35, B32, B33, D1–D7, D10, D13, D16, D19, D22, D25, D28, D31, D34, D43, D44, D45, D47, E1, E3, E5–E7, E10, E12, E19, E22, G2, G4, G7, G9, G13, G15, G18, G20, H1, H2, H4, H6, H7, H27, K01, and K04–K10) according to the following conditions: *[AQR 12.5.2.6(d)]*
  - a. Opacity testing shall be conducted in accordance with EPA Test Method 9 and the procedures in 40 CFR Parts 60.8, 60.11, and 60.675, as applicable.
  - b. Subsequent performance testing for opacity shall be conducted upon written notification from the Control Officer.

Particulate Matter Concentration

10. The permittee shall conduct performance testing for PM concentration on all emission units subject to 40 CFR Part 60, Subpart UUU (EUs: B36, D11, D14, D17, D20, D23, D26, D29, D32, D35, D46, D48, G3, G8, G14, and G19) according to the following conditions: *[NSR ATC/OP Modification 6, Revision 1, Conditions III-E-4 and III-E-5 (08/12/04), NSR ATC (01/31/2023), AQR 12.5.2.6(d), & 40 CFR Part 60.736(b)(1)]*
  - a. PM concentration testing shall be conducted in accordance with EPA Test Method 5 and the procedures in 40 CFR Parts 60.8, 60.11, and 60.636, as applicable.

- b. The sampling time and volume for each PM concentration test run shall be at least two hours and 1.70 dscm.
  - c. Initial performance testing for PM concentration shall be conducted on all affected emission units in accordance with 40 CFR Part 60.8(a). Initial performance tests shall be conducted within 60 days of achieving the maximum production rate at which the source will be operated, but no later than 180 days after initial startup (EUs: D46 and D48).
  - d. Subsequent performance testing for PM concentration shall be conducted every five years, within the same quarter as the anniversary date of the last performance test.
11. The permittee shall adhere to the performance testing protocols defined in Table 4-4. Different baghouses shall be tested at each testing cycle until every baghouse from each category has been tested.

**Table 4-4: Performance Testing Protocols**

EU	Description	Baghouse				Protocol
		ID	Make	Model No.	Serial No.	
B25, & K04-K07	Roller Mill, Screen & Conveyors	1	General Combustion	UFI-70	14005	Test Every Five Years
B36	Rotary Dryer #2	3	Gencor	CFS225		Test Every Five Years
D11	Impeller Mill #1	6	Pulse Air	Ultra Jet #50		Permittee shall test at least two baghouses (ID: 6–11) every five years.
D14	Impeller Mill #2	7	Pulse Air	Ultra Jet #50	64017	
D17	Impeller Mill #3	8	Pulse Air	Ultra Jet #50		
D20	Impeller Mill #4	9	Pulse Air	Ultra Jet #50	84021	
D23	Impeller Mill #5	10	Pulse Air	Ultra Jet #50		
D26	Impeller Mill #6	11	Pulse Air	Ultra Jet #50		
D29	Impeller Mill #7	12	Mikro Pulsaire	Ultra Jet #50	86003	Permittee shall test one baghouse (ID: 12–14) every five years.
D32	Impeller Mill #8	13	Mikro Pulsaire	Ultra Jet #50	86002	
D35	Impeller Mill #9	14	Mikro Pulsaire	Ultra Jet #50	56054	
G3	Impeller Mill #10	19	CP Environmental	144TNFW465C		Permittee shall test one baghouse (ID: 19–22) every five years.
G8	Impeller Mill #11	20	CP Environmental	144TNFW465C		
G14	Impeller Mill #12	21	CP Environmental	144TNFW465C		
G19	Impeller Mill #13	22	CP Environmental	144TNFW465C		
D46	Impeller Mill #14		TBD	TBD	TBD	Permittee shall test one baghouse every five years (EUs: D46 & D48)
D48	Impeller Mill #15		TBD	TBD	TBD	

12. The permittee shall conduct performance testing for PM concentration on all emission units with capture systems subject to 40 CFR Part 60, Subpart OOO (EUs: B25, B35, D1–D4, D7–D10, D13, D16, D19, D22, D25, D28, D31, D34, D43, D44, D45, D47, E1–E23, E25–E27a, E29–E37a, G1, G4–G7, G9–G13, G15–G18, G20–G22, H1–H8, H10–H20, H22, H24, H30, H33–H35, K01, and K04–K07) according to the following conditions: *[NSR ATC/OP Modification 6, Revision 1, Conditions III-E-4 and III-E-5 (08/12/04) & AQR 12.5.2.6(d)]*

- a. PM concentration testing shall be conducted at the stack exhaust points of the capture and control system.
- b. PM concentration testing shall be conducted in accordance with EPA Test Method 5 or 17 and the procedures in 40 CFR Parts 60.8, 60.11, and 60.675.
- c. Subsequent performance testing for PM concentration shall be conducted every five years, within the same quarter as the anniversary date of the last performance test.

### Gasoline Dispensing

13. The permittee shall conduct Phase I vapor recovery tests in accordance with the CARB-approved vapor recovery test procedures (as revised) listed in Table 4-5, as applicable. *[AQR 12.5.2.6(d)]*
14. The permittee shall submit a DAQ-approved vapor recovery test notification form (available on the DAQ website) to schedule each vapor recovery test with the Stationary Sources Section supervisor at least 30 calendar days before the anticipated date of testing, unless otherwise specified in this permit. *[AQR 12.5.2.6(d)]*
15. Any approved scheduled vapor recovery system test cannot be canceled and/or rescheduled without the Control Officer's prior approval. *[AQR 12.5.2.6(d)]*
16. The permittee shall conduct initial Phase I vapor recovery system testing on affected GDO equipment according to the following requirements: *[AQR 12.5.2.6(d)]*
  - a. The permittee shall conduct and pass an initial vapor recovery system test within 30 days of startup of new equipment, or when the integrity of the vapor recovery system has been affected by a modification or repair. Routine maintenance, including the replacement of hoses, nozzles, and efficiency compliance devices (e.g., bellows, face shield, splash guard, etc.), does not require an initial vapor recovery system test.
  - b. The permittee shall conduct and pass subsequent tests on or before the anniversary date of the previous successful test at the frequency specified in Table 4-5.
  - c. Each test may be witnessed by a DAQ inspector.
17. The permittee shall submit a "Gasoline Dispensing Operation Certification of Vapor Recovery System Test Results Submittal Form" (available on DAQ's website), along with associated test results, to the Control Officer after each vapor recovery system test. The submittal form shall be: *[AQR 12.5.2.6(d)]*
  - a. Complete and signed by the Responsible Official for the equipment being tested. The Responsible Official must certify that the test results are true, accurate, and complete.
  - b. Submitted by mail, by fax, or in person.
  - c. Submitted by the source or by the permittee's testing company or consultant. However, the source is the responsible party and must ensure that the test report is delivered to DAQ within the applicable time frame.

18. Whether the source passes or fails the vapor recovery system test, the permittee shall submit the test results report to the Control Officer within 60 days of the date of the test. [AQR 12.5.2.6(d)]
19. If the source fails a vapor recovery system test or if the test is incomplete [Guidelines for Source Testing (9/19/2019)]:
  - a. The permittee shall notify the Control Officer, by email or phone, within 24 hours of equipment test failure. If repairs can be made within five working days of the original scheduled test date, the permittee shall make the repairs and pass the required test(s).
  - b. If the equipment cannot be repaired within five working days of the scheduled test, the permittee shall make all necessary repairs and schedule a retest of the affected facility by submitting a new test notification form to the Control Officer no less than three business days before the new test date.
  - c. After retesting (pass/fail/incomplete), the owner/operator shall submit a test results submittal form (available on the DAQ website) and supporting test documents to the Control Officer within 15 days of completion.
  - d. The permittee shall continue retesting until the affected facility successfully passes all aspects of the vapor recovery system test.
20. The Control Officer may require the permittee to conduct any test after a failed vapor recovery system test in the presence of a DAQ representative. [AQR 12.5.2.6(d)]

**Table 4-5. Vapor Recovery System Testing Procedures and Schedules**

Type of Vapor Recovery System	Test Procedure	Frequency
Phase I Vapor Balance System	Pressure Decay/Leak test: CARB Procedure TP-201.3A (as revised for AST)	Initial and every three years thereafter
	Leak Rate and Cracking Pressure of Pressure/Vacuum Vent Valves: CARB Procedure TP-201.1E (as revised)	

Note: AST = aboveground storage tank.

21. The Control Officer will consider approving the permittee’s request for alternative performance test methods if proposed in writing in the performance test protocols. [AQR 12.5.2.8(a)]
22. The permittee shall submit a report describing the results of each performance test to the Control Officer within 60 days of the end of the test. [AQR 12.5.2.8]
23. The permittee of any stationary source that fails to demonstrate compliance with emissions standards or limitations during any performance test shall submit a compliance plan to the Control Officer within 90 days of the end of the performance test. [AQR 12.5.2.8(a)]
24. The Control Officer may require additional performance testing when operating conditions appear inadequate to demonstrate compliance with the emissions and/or limitations in this permit. [AQR 4.2; and AQR 12.5.2.8(a)]

### 4.3 RECORDKEEPING

1. The permittee shall keep records of all inspections, maintenance, and repairs, as required by this permit. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
2. The permittee shall comply with all applicable recordkeeping requirements of 40 CFR Part 60.7; 40 CFR Part 60, Subpart IIII; Subpart OOO; Subpart UUU; 40 CFR Part 63, Subpart ZZZZ; Subpart CCCCC; and any other applicable regulations.
3. All records, logs, etc., or copies thereof, shall be kept on-site for a minimum of five years from the date the measurement, or data was entered. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
4. All inspections, visible emission checks, and tests required for monitoring, logs, reports, and records shall contain at least the date and time, the name of the person performing the action, the results or findings, and the type of corrective action taken if required. *[AQR 12.5.2.6(d)]*
5. Records and data required by this permit to be maintained by the permittee may be audited at any time by a third party selected by the Control Officer. *[AQR 4.1]*
6. At a minimum, the permittee shall create and maintain the records identified in Section 4.3.7 and 4.3.8, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
7. The permittee shall maintain the following records for reporting. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

#### General

- a. Deviations from permit requirements resulting in excess emissions (reported as required by Section 4.4 of this permit);
- b. Deviations from permit requirements not resulting in excess emissions (reported semiannually);

#### Mineral Processing and Wallboard Manufacturing/Recycling

- c. Monthly, consecutive 12-month total throughput of materials processed by equipment or processes with a throughput limit (reported semiannually);
- d. Monthly, consecutive 12-month total amount of VMT on paved and unpaved haul roads separately, with the VMT calculation method (EU: K14) (reported semiannually);
- e. Monthly total area of stockpile (EU: M1) (reported semiannually);

#### Drilling and Blasting

- f. Monthly, consecutive 12-month total usage of ANFO (EU: A5) (reported semiannually);
- g. Calculated area of each blast in sq. ft. (EU: A5);

- h. Monthly, consecutive 12-month total number of detonated blasts (EU A5) (reported semiannually);
- i. Monthly, consecutive 12-month total number of holes drilled (EU: A5) (reported semiannually);

### Gasoline Dispensing

- j. Monthly, consecutive 12-month combined throughput of gasoline (reported semiannually);

### Engines

- k. Date and duration of operation of each diesel emergency fire pump for testing, maintenance, and nonemergency use (EUs: U04 and U05) (reported semiannually);
- l. Date and duration of operation of each diesel emergency fire pump for emergency use, including documentation justifying its use during the emergency (EUs: U04 and U05) (reported semiannually);
- m. Monthly, consecutive 12-month total hours of operation of each diesel water pump (EU: U03 and U06) (reported semiannually); and
- n. Sulfur content and cetane index or aromatic content of diesel fuel used to power the diesel-powered water pump (EU: U03) and each diesel-powered fire pump (EUs: U04 and U05), as certified by the supplier;

### Flakt Dryer #2

- o. Monthly, consecutive 12-month total fuel consumption for Flakt Dryer #2 in MMBtu (EU: H26) (reported semiannually).
8. The permittee shall maintain the following records: *[AQR 12.5.2.6(d)]*

### Opacity

- a. Dates and times when visible emissions checks and observations were made, and the corrective steps taken to bring opacity into compliance; *[AQR 12.5.2.6(d)]*

### Mineral Processing and Wallboard Manufacturing/Recycling

- b. Daily moisture content reports (when raw gypsum operation is operated);
- c. Daily baghouse pressure drop readings;
- d. Silt content and silt loading results;
- e. Repairs to polyethylene cover for the reserve stockpile (EU: M1);
- f. Performance test results (reported as required by Section III-E of this permit);

### Flakt Dryer #2

- g. Monthly throughput of materials processed through Flakt Dryer #2 (EU: H26) in msf;
- h. Hourly moisture analysis results for materials processed through Flakt Dryer #2 (EU: H26);
- i. Monthly amount of water evaporated through Flakt Dryer #2 (EU: H26) in lbs;

### Cooling Towers

- j. Monthly TDS test results of each cooling tower's circulation water (EUs: I01, I02, and I03);

### Gasoline Dispensing

- k. Equipment inspections;
- l. Date and time that storage and distribution equipment was taken out of service;
- m. Date of repair or replacement of storage and distribution equipment/parts;

### Engines

- n. Manufacturer's engine data showing compliance with the emission standards for each diesel emergency fire pump (EUs: U04, and U05) and water pump (EU: U03);
- o. Oil and filter change dates, and corresponding hours on the hour meter; inspection and replacement dates for air cleaners, hoses and belts, and other emission-related repairs; and maintenance performed on the diesel water pump engine (EU: U06);

### Baghouses

- p. Monthly external inspections for each baghouse, including:
  - i. Verification of the pulse timing sequence;
  - ii. Verification that the cleaning system is not of an unusual appearance, and fans are running, and not exhibiting unusual sounds or vibrations; and
  - iii. Verification that seams, connections, and housings are sealed and leak-free, including walls, hoppers, ducting, and piping.
- q. Annual internal inspections for each baghouse; and
- r. Instances of required daily opacity readings on baghouses, binvents, and/or stack discharges where visible emissions were observed, and description(s) of any action(s) taken.



#### 4.4 REPORTING AND NOTIFICATIONS

1. The permittee shall certify compliance with the terms and conditions contained in this Part 70 OP, including emission limitations, standards, work practices, and the means for monitoring such compliance. *[AQR 12.5.2.8(e)]*
2. Within 15 days of commencing operations, the permittee shall submit to the Control Officer any outstanding identification and/or description for new emission unit(s) that was not previously available, and thus was noted in this permit with “TBD.” *[AQR 12.5.2.8(a)]*
3. The permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W. Russell Road, Suite 200, Las Vegas, NV 89118) and the Region 9 Administrator (Director, Air and Radiation Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each calendar year will be due on January 30 of the following year, and shall include the following: *[AQR 12.5.2.8(e)]*
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period. These methods and means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements described in 40 CFR Part 70.6(a)(3). If necessary, the permittee shall also identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information; and
  - c. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means designated in (b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify, as possible exceptions to compliance, any periods during which compliance was required and in which an excursion or exceedance, as defined under 40 CFR Part 64, occurred.
4. The permittee shall report to the Control Officer any startup, shutdown, malfunction, emergency, or deviation that causes emissions of regulated air pollutants in excess of any limits set by regulations or this permit. The report shall be in two parts, as specified below: *[AQR 12.5.2.6(d)(4)(B); AQR 25.6.1]*
  - a. Within 24 hours of the time the permittee learns of the excess emissions, the permittee shall notify DAQ by phone at (702) 455-5942, by fax at (702) 383-9994, or by email at [airquality@clarkcountynv.gov](mailto:airquality@clarkcountynv.gov).
  - b. Within 72 hours of the notification required by paragraph (a) above, the permittee shall submit a detailed written report to DAQ containing the information required by AQR 25.6.3.

5. With the semiannual monitoring report, the permittee shall report to the Control Officer all deviations from permit conditions that do not result in excess emissions, including those attributable to malfunction, startup, or shutdown. Reports shall identify the probable cause of each deviation and any corrective actions or preventative measures taken. *[AQR 12.5.2.6(d)(4)(B)]*
6. The owner or operator of any source required to obtain a permit under AQR 12 shall report to the Control Officer emissions in excess of an applicable requirement or emission limit that pose a potential imminent and substantial danger to public health and safety or the environment as soon as possible, but no later than 12 hours after the deviation is discovered, and submit a written report within two days of the occurrence. *[AQR 25.6.2]*
7. The permittee shall submit all compliance certifications to the U.S. Environmental Protection Agency (EPA) and to the Control Officer. *[AQR 12.5.2.8(e)(4)]*
8. Any application form, report, or compliance certification submitted to the Control Officer pursuant to the permit or the AQRs, shall contain a certification by a Responsible Official, with an original signature, of truth, accuracy, and completeness. This certification, and any other required under AQR 12.5, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *[AQR 12.5.2.6(l)]*
9. The permittee shall furnish to the Control Officer, in writing and within a reasonable time, any information that the Control Officer may request to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Control Officer copies of records that the permit requires keeping. The permittee may furnish records deemed confidential directly to the Administrator, along with a claim of confidentiality. *[AQR 12.5.2.6(g)(5)]*
10. At the Control Officer's request, the permittee shall provide any information or analyses that will disclose the nature, extent, quantity, or degree of air contaminants that are or may be discharged by the source, and the type or nature of control equipment in use. The Control Officer may require such disclosures be certified by a professional engineer registered in the state. In addition to this report, the Control Officer may designate an authorized agent to make an independent study and report on the nature, extent, quantity, or degree of any air contaminants that are or may be discharged from the source. An agent so designated may examine any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.1]*
11. The permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1 and AQR 12.5.2.4]*
  - a. The annual emissions inventory must be submitted to DAQ by March 31 of each calendar year (if March 31 falls on a Saturday or Sunday, or on a Nevada or federal holiday, the submittal shall be due on the next regularly scheduled business day);

- b. The calculated actual annual emissions from each emission unit shall be reported even if there was no activity, along with the total calculated actual annual emissions for the source based on the emissions calculation methodology used to establish the potential to emit (PTE) in the permit or an equivalent method approved by the Control Officer prior to submittal; and
  - c. As the first page of text, a signed certification containing the sentence: “I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate, and complete.” This statement shall be signed and dated by a Responsible Official of the company (a sample form is available from DAQ).
12. Stationary sources that emit 25 tons or more of nitrogen oxide (NOx) and/or emit 25 tons or more of volatile organic compounds (VOC) from their emission units, insignificant activities, and exempt activities during a calendar year shall submit an annual emissions statement for both pollutants. Emissions statements must include actual annual NOx and VOC emissions from all activities, including emission units, insignificant activities and exempt activities. Emissions statements are separate from, and additional to, the calculated annual emissions reported each year for all regulated air pollutants (aka Emissions Inventory). *[AQR 12.9.1]*
  13. The permittee shall comply with all applicable notification and reporting requirements of 40 CFR Part 60, Subparts A, OOO, UUU, and IIII, and 40 CFR Part 63, Subparts ZZZZ and CCCCC. *[AQR 12.5.2.6(d)]*
  14. The permittee shall submit semiannual monitoring reports to DAQ. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
  15. The following requirements apply to semiannual reports: *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
    - a. The report shall include item listed in Section 4.3.7 for reporting.
    - b. The report shall be based on a calendar semiannual period, which includes partial reporting periods.
    - c. The report shall be received by DAQ within 30 calendar days after the semiannual period.
  16. Regardless of the date of issuance of this OP, the source shall comply with the schedule for report submissions outlined in Table 4-6. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

**Table 4-6: Required Submission Dates for Various Reports**

Required Report	Applicable Period	Due Date
Semiannual report for 1 <sup>st</sup> six-month period	January, February, March, April, May, June	July 30 each year <sup>1</sup>
Semiannual report for 2 <sup>nd</sup> six-month period, plus any additional annual records required	July, August, September, October, November, December	January 30 each year <sup>1</sup>
Annual compliance certification report	Calendar year	January 30 each year <sup>1</sup>
Annual emissions inventory report	Calendar year	March 31 each year <sup>1</sup>

Required Report	Applicable Period	Due Date
Annual emissions statement <sup>2</sup>	Calendar year	March 31 each year <sup>1</sup>
Notification of malfunctions, startup, shutdowns or deviations with excess emission	As required	Within 24 hours of permittee learning of event <sup>1</sup>
Written report of malfunctions, startup, shutdowns or deviations with excess emissions	As required	Within 72 hours of notification
Deviation report without excess emissions	As required	Along with semiannual reports <sup>1</sup>
Excess emissions that pose a potential imminent and substantial danger	As required	Within 12 hours of the permittee learns of the event
Performance testing protocol	As required	No less than 45 days, but no more than 90 days, before the anticipated test date <sup>1</sup>
Performance testing report	As required	Within 60 days of end of test <sup>1</sup>

<sup>1</sup> Each report shall be received by the Control Officer on or before the due date listed. If the due date falls on a federal or Nevada holiday, or on any day the office is not normally open for business, the submittal is due on the next regularly scheduled business day.

<sup>2</sup> Required only for stationary sources that emit 25 tons or more of nitrogen oxide (NO<sub>x</sub>) and/or emit 25 tons or more of volatile organic compounds (VOC) during a calendar year.

17. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit emission limits, applicable permit requirements, and requirements of applicable federal regulations. *[AQR 4.1]*

## 4.5 MITIGATION

The source has no federal offset requirements. *[AQR 12.7]*

---

## **5.0 PERMIT SHIELD**

---

### Permit Shield

1. The source withdrew the request for a permit shield on August 26, 2024. [AQR 12.5.2.9]

---

## 6.0 OTHER REQUIREMENTS

---

1. Any person who violates any provision of the AQRs, including, but not limited to, any application requirement; any permit condition; any fee or filing requirement; any duty to allow or carry out inspection, entry, or monitoring activities; or any requirements from DAQ is guilty of a civil offense and shall pay a civil penalty levied by the Air Pollution Control Hearing Board and/or the Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. *[AQR 9.1; NRS 445B.640]*
2. Any person aggrieved by an order issued pursuant to AQR 9.1 is entitled to review, as provided in Chapter 233B of the NRS. *[AQR 9.12]*
3. The permittee shall comply with the requirements of Title 40, Part 61 of the Code of Federal Regulations (40 CFR Part 61), Subpart M—the National Emission Standard for Asbestos—for all demolition and renovation projects. *[AQR 13.1(b)(8)]*
4. The permittee shall not use, sell, or offer for sale any fluid as a substitute material for any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator freezer unit, or other cooling or heating device designated to use a Class I or Class II ozone-depleting substance or any nonexempt substitute refrigerant as a working fluid, unless such fluid has been approved for sale in such use by the EPA Administrator. The permittee shall keep records of all paperwork relevant to the applicable requirements of 40 CFR Part 82 on-site. *[40 CFR Part 82]*
5. A risk management plan is required for the storing, handling and use of an applicable “Highly Hazardous Chemical” pursuant to 40 CFR Part 68. The permittee shall submit revisions of the risk management plan to the appropriate authority and a copy to DAQ. *[40 CFR Part 68.150(b)(3)]*

---

## 7.0 ADMINISTRATIVE REQUIREMENTS

---

### 7.1 GENERAL

1. The permittee shall comply with all conditions of the Part 70 OP. Any permit noncompliance may constitute a violation of the Clark County Air Quality Regulations (AQRs), Nevada law, and the Clean Air Act, and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a renewal application. *[AQR 12.5.2.6(g)(1)]*
2. If any term or condition of this permit becomes invalid as a result of a challenge to a portion of this permit, the other terms and conditions of this permit shall be unaffected and remain valid. *[AQR 12.5.2.6(f)]*
3. The permittee shall pay all permit fees pursuant to AQR 18. *[AQR 12.5.2.6(h)]*
4. This permit does not convey property rights of any sort, or any exclusive privilege. *[AQR 12.5.2.6(g)(4)]*
5. The permittee agrees to allow inspection of the premises to which this permit relates by any authorized representative of the Control Officer at any time during the permittee's hours of operation without prior notice. The permittee shall not obstruct, hamper, or interfere with any such inspection. *[AQR 4.1; AQR 5.1.1; and AQR 12.5.2.8(b)]*
6. The permittee shall allow the Control Officer, upon presentation of credentials, to: *[AQR 4.1 and AQR 12.5.2.8(b)]*
  - a. Access and copy any records that must be kept under the conditions of the permit;
  - b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
  - c. Sample or monitor substances or parameters for the purpose of assuring compliance with the permit or applicable requirements; and
  - d. Document alleged violations using such devices as cameras or video equipment.
7. Any permittee who fails to submit relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit the needed supplementary facts or corrected information. In addition, the permittee shall provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit. A Responsible Official shall certify the additional information consistent with the requirements of AQR 12.5.2.4. *[AQR 12.5.2.2]*
8. Anyone issued a permit under AQR 12.5 shall post it in a location where it is clearly visible and accessible to facility employees and DAQ representatives. *[AQR 12.5.2.6(m)]*

9. The permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. *[AQR 12.5.2.6(g)(2)]*

## **7.2 MODIFICATION, REVISION, AND RENEWAL REQUIREMENTS**

1. No person shall begin actual construction of a new Part 70 source, or modify or reconstruct an existing Part 70 source that falls within the preconstruction review applicability criteria, without first obtaining an Authority to Construct (ATC) from the Control Officer. *[AQR 12.4.1.1(a)]*
2. The permit may be revised, revoked, reopened and reissued, or terminated for cause by the Control Officer. The filing of a request by the permittee for a permit revision, revocation, reissuance, or termination, or of a notification of planned changes or anticipated noncompliance, does not stay any permit condition. *[AQR 12.5.2.6(g)(3)]*
3. The permit shall be reopened under any of the following circumstances and when all applicable requirements pursuant to AQR 12.5.2.15 are met: *[AQR 12.5.2.15(a)]*
  - a. New applicable requirements become applicable to a stationary source considered “major” (per the definition in AQR 12.2, AQR 12.3, or 40 CFR Part 70.3(a)(1)) with a remaining permit term of three or more years;
  - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the Acid Rain Program;
  - c. The Control Officer or U.S. Environmental Protection Agency (EPA) determines that the permit contains a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or
  - d. The EPA Administrator or the Control Officer determines that the permit must be revised or revoked to assure compliance with applicable requirements.
4. A permit, permit revision, or renewal may be approved only if all of the following conditions have been met: *[AQR 12.5.2.10(a)]*
  - a. The permittee has submitted to the Control Officer a complete application for a permit, permit revision, or permit renewal (except a complete application need not be received before a Part 70 general permit is issued pursuant to AQR 12.5.2.20); and
  - b. The conditions of the permit provide for compliance with all applicable requirements and the requirements of AQR 12.5.
5. The permittee shall not build, erect, install, or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission that would otherwise constitute a violation of an applicable requirement. *[AQR 80.1 and 40 CFR Part 60.12]*



6. No permit revisions shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit. *[AQR 12.5.2.6(i)]*
7. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. *[AQR 12.5.2.11(b)]*
8. For purposes of permit renewal, a timely application is a complete application that is submitted at least six months, but not more than 18 months, prior to the date of permit expiration. If a source submits a timely application under this provision, it may continue operating under its current Part 70 OP until final action is taken on its application for a renewed Part 70 OP. *[AQR 12.5.2.1(a)(2)]*

## 8.0 ATTACHMENTS

### 8.1 APPLICABLE REGULATIONS

#### *Requirements Specifically Identified as Applicable*

1. NRS, Chapter 445B.
2. Applicable AQRs listed in Table 8-1.

**Table 8-1: Applicable Clark County AQRs**

Citation	Title
AQR 00	"Definitions"
AQR 04	"Control Officer"
AQR 05	"Interference with Control Officer"
AQR 08	"Persons Liable for Penalties – Punishment: Defense"
AQR 09	"Civil Penalties"
AQR 10	"Compliance Schedules"
AQR 11	"Ambient Air Quality Standards"
AQR 12.0	"Applicability and General Requirements"
AQR 12.4	"Authority to Construct Application and Permit Requirements for Part 70 Sources"
AQR 12.5	"Part 70 Operating Permit Requirements"
AQR 12.9	"Annual Emissions Inventory Requirement"
AQR 13.2(b)(1)	"Subpart A - General Provisions"
AQR 13.2(b)(82)	"Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
AQR 13.2(b)(106)	"Subpart CCCCCC – National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities."
AQR 14.1(b)(1)	"Subpart A – General Provisions"
AQR 14.1(b)(68)	"Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants"
AQR 14.1(b)(74)	"Subpart UUU – Standards of Performance for Calciners and Dryers in Mineral Industries."
AQR 14.1(b)(81)	"Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
AQR 18	"Permit and Technical Service Fees"
AQR 25	"Affirmative Defense for Excess Emissions due to Malfunctions, Startup, and Shutdown"
AQR 26	"Emission of Visible Air Contaminants"
AQR 28	"Fuel Burning Equipment"
AQR 29	"Sulfur Content of Fuel Oil"
AQR 40	"Prohibitions of Nuisance Conditions"
AQR 41	"Fugitive Dust", AQR 41.1.2 only
AQR 42	"Open Burning"
AQR 43	"Odors in the Ambient Air"

Citation	Title
AQR 70	"Emergency Procedures"
AQR 80	"Circumvention"
AQR 94	"Permitting and Dust Control for Construction Activities"

3. Clean Air Act Amendments (42 U.S.C. § 7401, et seq.)

4. Applicable 40 CFR sections are listed in Table 8-2.

**Table 8-2: Federal Standards**

Citation	Title
40 CFR Part 52.21	"Prevention of significant deterioration of air quality"
40 CFR Part 52.1470	"Approval and Promulgation of Implementation Plans, Subpart DD—Nevada"
40 CFR Part 60, Subpart A	"General Provisions"
40 CFR Part 60, Subpart OOO	"Standards of Performance for Nonmetallic Mineral Processing Plants"
40 CFR Part 60, Subpart UUU	"Standards of Performance for New Stationary Sources (NSPS) – Calciners and Dryers in Mineral Industries"
40 CFR Part 60, Subpart IIII	"Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
40 CFR Part 60	Appendix A, Method 9 or equivalent, (Opacity)
40 CFR Part 60, Appendix A-3	"Test Methods 4 through 5I" (PM in g/dscm)
40 CFR Part 60, Appendix A-4	"Test Methods 6 through 10B" (opacity)
40 CFR Part 63, Subpart A	"General Provisions"
40 CFR Part 63, Subpart ZZZZ	"National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
40 CFR Part 63, Subpart CCCCCC	"National Emission Standards for Hazardous Air Pollutants for Gasoline Dispensing Facilities"
40 CFR 68	"Risk Management Plan"
40 CFR Part 70	"State Operating Permit Programs"
40 CFR Part 82	"Protection of Stratospheric Ozone"