



**DES**  
**DEPARTMENT OF ENVIRONMENT  
AND SUSTAINABILITY**



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**PORTABLE PART 70 OPERATING PERMIT  
TECHNICAL SUPPORT DOCUMENT  
(STATEMENT of BASIS)**

**APPLICATION FOR:  
Reopen for Cause**

**SUBMITTED BY:  
N/A**

**FOR:  
Anniversary Mine LLC  
Source ID: # 17315**

**LOCATION:  
Approx. 22 miles from Las Vegas on North Shore Road  
Moapa, Nevada**

SIC code 4953, "Solid Waste Combustors and Incinerators"  
NAICS code 562213, "Solid Waste Combustors and Incinerators"

TSD Date: October 20, 2021

## EXECUTIVE SUMMARY

Anniversary Mine LLC is a portable wood/yard waste processing/incineration operation. This source category falls under Standard Industry Classification code 4953: Solid Waste Combustors and Incinerators and North American Industrial Classification System code 562213: Solid Waste Combustors and incinerators. This source is considered a Part 70 Source based on the requirements of 40 CFR 60, Subpart CCCC, and a minor source of regulated air pollutants. The source consists of an air curtain incinerator and an 87 hp diesel engine.

The following table summarizes the source potential to emit for each regulated air pollutant from all emission units addressed by this minor Part 70 Operating Permit.

<b>Pollutant</b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub></b>	<b>NO<sub>x</sub></b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>VOC</b>	<b>HAPS</b>	<b>H<sub>2</sub>S</b>	<b>Pb</b>
Tons/year	13.32	6.40	1.34	11.48	0.03	5.10	0.01	0	0
Major Source Thresholds (Title V)	100	100	100	100	100	100	10/25	—	—
Major Stationary Source Thresholds (PSD)	250	250	250	250	250	250	---	—	—

The incinerator is subject to 40 CFR 60, Subpart CCCC, and the diesel engine is subject to 40 CFR 63, Subpart ZZZZ.

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## I. ACRONYMS

**Table I-1: List of Acronyms**

<b>Acronym</b>	<b>Term</b>
ACI	Air Curtain Incinerator
AM	Anniversary Mine
AQR	Clark County Air Quality Regulation
ATC	Authority to Construct
CAO	Corrective Action Order
CFR	Code of Federal Regulations
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
DAQ	Division of Air Quality
DES	Department of Environment and Sustainability
DOM	date of manufacture
dscf	dry standard cubic feet
dscm	dry standard cubic meter
EPA	U.S. Environmental Protection Agency
EU	emission unit
g/gr	gram
H <sub>2</sub> S	hydrogen sulfide
HAP	hazardous air pollutant
hp	horsepower
kW	kilowatts
MSP	Minor Source Permit
MSW	Municipal Solid Waste
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standard
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
PSD	Prevention of Significant Deterioration
PTE	potential to emit
SIC	Standard Industrial Classification
SO <sub>2</sub>	sulfur dioxides
STL	Settlement Agreement
U.S.C.	United States Code
VMT	vehicle miles traveled
VOC	volatile organic compound

## II. SOURCE INFORMATION

### A. GENERAL

Permittee: Anniversary Mine LLC  
Mailing Address: 6933 East Bonanza Road  
Las Vegas, Nevada 89110  
Responsible Official: David R. Jacks  
Phone Number: 702-526-3421

### B. DESCRIPTION OF PROCESS

Anniversary Mine LLC is a portable wood/yard waste processing/incineration operation.

Table II-B-1 lists the emission units covered by this operating permit. This source is considered a minor Part 70 Source based on the requirements of 40 CFR 60, Subpart CCCC.

**Table II-B-1: Summary of Emission Units**

EU	Rating	Type	Manufacturer	Model No.	Serial No.	SCC
A01	10 tph	Air Curtain Incinerator	Air Burners, Inc.	S-327		50100510
A02	2.0 miles R.T.	Unpaved haul road				50100401
A03	9.0 acres	Stockpiles				50100402
A04		Char Handling				50100402
B01	65.1 kW	Combustion Air Blower	Kubota	V3300-T	5N1F51	20300101
	87 hp	Engine— Diesel DOM 2005				

### C. PERMITTING HISTORY

Table II-C-1 represents the permitting history of this source.

**Table II-C-1: Permit History**

Date	Description
01/02/2014	Initial AQR 12.1 permit issued.
02/10/2014	Administrative revision issued.
09/19/2014	Reopen for cause.
12/11/2015	Administrative revision issued.
02/01/2017	Significant revision to a MSP issued.
06/07/2017	Administrative revision issued.
01/01/2019	MSP lapsed, not renewed.
04/09/2019	Initial Title V application submitted
04/01/2020	Permit transfer submitted.
05/28/2020	AQR 12.4 permit (ATC) issued.
10/01/2020	Initial Title V permit issued.
10/07/2021	Reopen for Cause for PM <sub>2.5</sub>

## D. CURRENT PERMITTING ACTION

### Reopen for Cause – September 2, 2021

This source is an existing major source that has a Title V operating permit. The Division of Air Quality (DAQ) is reopening the permit pursuant to Sections 12.5.2.15 of the Clark County Air Quality Regulations (AQR), which maintain that the Control Officer may reopen and revise a permit “to assure compliance with the applicable requirements.” This permit was reopened to include recently promulgated fugitive dust requirements for stationary sources.

AQR Sections 92 (Fugitive Dust from Unpaved Parking Lots and Storage Areas) and 94 (Permitting and Dust Control for Construction Activities) were recently revised to address fugitive dust at stationary sources. The revised regulations became effective on August 17, 2021. Subsections 92.1(c) and 94.1.1(a) require that the control measures and stabilization standards therein be made enforceable by the terms and conditions of the stationary source permit.

*The source’s permit has been revised to include these fugitive dust requirements.*

There are no other changes made to the permit with this permitting action.

## E. ALTERNATIVE OPERATING SCENARIO

None proposed.

## III. EMISSIONS INFORMATION

### A. SOURCE-WIDE PTE

Anniversary Mine LLC is a minor Part 70 Source with the following emissions.

**Table III-A-1: Source-wide PTE (tons per year)**

PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAPs	H <sub>2</sub> S	Pb
13.32	6.40	1.34	11.48	0.03	5.10	0.01	0	0

### B. EMISSIONS CALCULATIONS

None required for this action.

### C. OPERATIONAL LIMITS

All operational limits remain in effect.

### D. CONTROL TECHNOLOGY

All control technology remain in effect.

## **E. MONITORING**

All monitoring requirements remain in effect.

## **F. PERFORMANCE TESTING**

The source has not satisfied the initial Method 9 Visible Emissions Evaluation for Opacity requirement per the source's correspondence dated April 22, 2016 (17315\_20160623\_LET). Thus, the source is still required to conduct performance tests initially, and annually thereafter, in accordance with 40 CFR 60, Subpart CCCC.

## **G. RACT ANALYSIS**

The source will demonstrate compliance with RACT through the settlement agreement with maintaining compliance with the opacity requirements for char handling, VMT, and the stockpiles with 90% moisture.

# **IV. REGULATORY REVIEW**

## **A. LOCAL REGULATORY REQUIREMENTS**

DAQ has determined that the following public laws, statutes, and associated regulations are applicable:

- AQR 26, "Emission of Visible Air Contaminants"
- AQR 40, "Prohibitions of Nuisance"
- AQR 43, "Odors in the Ambient Air"
- AQR 70, "Emergency Procedures"
- AQR 80, "Circumvention"
- AQR 92, "Fugitive Dust"
- AQR 94, "Permitting and Dust Control for Construction Activities"

## **B. FEDERALLY APPLICABLE REGULATIONS**

None to be evaluated in this action.

# **V. COMPLIANCE**

## **A. COMPLIANCE CERTIFICATION**

Monitoring requirements are to be included for specified requirements in the permit.

Recordkeeping requirements are to be kept for all limitations specified in the permit.

Reporting requirements remain the same from the previous permit.



## **B. SUMMARY OF MONITORING FOR COMPLIANCE**

All remain in effect from the previous permitting actions.

## **VI. EMISSION REDUCTION CREDITS (OFFSETS)**

None.

## **VII. MODELING**

### **A. INCREMENT ANALYSIS**

None required for this action.