



DES
DEPARTMENT OF ENVIRONMENT
AND SUSTAINABILITY



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PART 70

TECHNICAL SUPPORT DOCUMENT

(STATEMENT of BASIS)

APPLICATION FOR:
Part 70 Operating Permit Reopening for Cause

SUBMITTED BY:
Initiated by DES

FOR:
Las Vegas Paving Corporation
Source ID: 17333

LOCATION:
12101 North Las Vegas Boulevard
North Las Vegas, Nevada 89165

SIC code 1422, "Sand and Gravel"
NAICS code 212321, "Construction Sand and Gravel Mining"

TSD Date: December 2, 2021

I. SOURCE INFORMATION

A. General

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| Permittee | Las Vegas Paving Corporation |
| Address (Mailing/Billing): | 4420 South Decatur Boulevard Las Vegas, Nevada 89103 |
| Source Name: | Las Vegas Paving Corporation |
| Source Address: | 12101 North Las Vegas Boulevard North Las Vegas, Nevada 89165 |
| Responsible Official: Telephone Number: | Joi Hunt-Fish (702) 205-6777 |

B. Description of Process

Las Vegas Paving (LVP) is an aggregate crushing and screening operation that will operate on the property owned by Lhoist North America of Arizona (LNA), Apex Lime Plant.

C. Permitting Actions

1. Reopening for Cause Dated September 2, 2021: Fugitive Emissions

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 is revised 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.

D. Public Participation

Pursuant to AQR 12.5.2.17, the Control Officer should provide for public notice, comment, and an opportunity for a hearing on initial permit issuances, significant revisions, reopenings for cause, and renewals in accordance with the procedures outlined in the regulation. Given the broad range of changes that can be addressed through a reopening of the permit, including those that typically do not require public participation, DAQ relied on the other criteria for public participation to ascertain whether it should be initiated for this reopening of the permit. As the updates addressed in this reopening qualify as neither an initial permit issuance nor a renewal of the Title V permit, the criteria for a significant permit revision was used to determine whether public participation is warranted. The changes addressed in this reopening of the permit do not meet any criterion for a significant revision that would otherwise require public participation. Instead, the changes addressed in this reopening introduce permit conditions that are more stringent than those in the current permit and should not be a matter of public objection. Therefore, considering the stringency of the new permit conditions, the cost of a public notice publication, and the delay in permit issuance relating to a public comment period, initiation of another public participation process cannot be adequately supported.