Clark County
Air Pollution Control
Hearing Board

Clark County Building Services

Presentation Room

September 19, 2024 at 1:30 p.m.

Additional material entered into the record at the

9/16/2024 Hearing Board Meeting:

APPEAL OF HEARING OFFICER DECISION

Agenda Item #3

HOLCIM-SWR, INC. (Part 70 Operating Permit, Source ID: 372) – NOV #10030

Response to Appellant's Explanation in Support of Appeal of Hearing Officer Holly Fic's July 24, 2024 Order dated 9/10/2024

Agenda Item #4A

REPORT BY DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY STAFF (January 1 – August 31, 2024)

Additional Material Item #3
Distributed 9/11/2024
S. Rogge, Admin. Secretary

CLARK COUNTY, NEVADA

AIR POLLUTION CONTROL HEARING BOARD

In the matter of the Notice of Violation No. 10030 Issued to HOLCIM-SWR, INC., Appellant	Appeal of Notice of Violation No. 10030 **RESPONSE TO APPELLANT'S EXPLANATION IN SUPPORT OF APPEAL OF HEARING OFFICER HOLLY FIC'S JULY 24, 2024 ORDER**

Introduction

On July 18, 2024, Air Pollution Control Hearing Officer Holly Fic held a hearing on Notice of Violation ("NOV") No. 10030 that the Clark County Department of Environment and Sustainability, Division of Air Quality ("DAQ") had issued to Holcim-SWR, Inc. ("Holcim") on June 26, 2024. (Hearing Board Agenda Record ("HB") at 115-136.) The NOV alleges that Holcim violated its Part 70 Operating Permit, Source ID: 372 ("Permit"), specifically Permit Condition III.B.31, on May 29, 2024, by allowing dust from one of its haul roads to become airborne. Condition III.B.31 states: "The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner that allows or may allow controllable particulate matter to become airborne."[1] (HB at 82.) After a hearing on the matter, the Hearing Officer found Holcim in violation of Permit Condition III.B.31 and assessed a penalty. Upon issuance of the Hearing Officer Order dated July 24, 2024, Holcim timely appealed the Order to the Air Pollution Control Hearing Board. (HB at 001-002.) In addition to submitting the appeal form, Holcim submitted an Explanation in Support of Appeal of Hearing Officer Holly Fic's July 24, 2024, Order ("Explanation") to which DAQ responds. (HB at 009-110.)

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[1] This permit condition is based on Clark County Air Quality Regulation ("AQR") Subsection 41.1.2. which reads: "No Person shall cause or permit the handling, transporting, or storage of any material in a manner which allows or may allow controllable particulate matter to become airborne."

Standard of Review

AQR 7.5(f) states that an appeal of a hearing officer order "shall be heard 'de novo' (i.e. from the beginning), with testimony and exhibits presented and the appeal conducted in the same manner as before the Hearing Officer."

Response to Holcim's Explanation

The gist of Holcim's argument is that Permit Condition III.B.31 does not apply to the dust emissions DAQ observed on May 29, 2024, at Holcim's facility. As explained below, DAQ disagrees with Holcim's position.

The haul roads at Holcim's facility are emission units listed in Table III-B-22. (HB at 73.) Permit Condition III-B-31 is found at the end of Section III which is entitled "Emission Units and Applicable Requirements." On May 29, 2024, DAQ observed dust coming off of one of the haul roads near the facility's truck scales as a haul truck drove over it. In the act of transporting material, the haul truck caused dust or controllable particulate matter to become airborne in violation of Permit Condition III.B.31.

As Holcim points out in its Explanation, there are other permit conditions that apply to haul roads. DAQ agrees, but not to the exclusion of Permit Condition III-B-31. DAQ has the enforcement discretion to determine which permit conditions to cite in a NOV. In this case, DAQ made the decision to rely on and cite to Permit Condition III-B-31. To the extent that the various conditions applicable to haul roads are inconsistent, Permit Condition III-D-42 requires the application of the most stringent standard or requirement. It states: "The permittee must comply with control requirements contained in this section. If there is inconsistency between standards or requirements, the most stringent standard or requirement applies." It is DAQ's position that the Permit Condition III-B-31 is not inconsistent with the other standards and requirements that apply to haul roads. They all apply. They are all designed to prevent the type of dust emissions observed by DAQ at Holcim's facility on May 29, 2024.

The bulk of Holcim's argument focuses on the Permit Condition III-B-32. (HB at 82.) On April 5, 2022, DAQ notified Holcim, as well as all other affected stationary sources,

that it would not take any action on permit conditions derived from AQR Sections 92 and 94. See two emails dated April 5, 2022, attached hereto as Exhibit A. Whether or not DAQ should have followed a different process to take this action is irrelevant because Permit Condition III-B-32, on its face, does not apply to Holcim's haul roads. Instead, it applies to trackout which is defined as soil, mud, or dirt on ***paved*** surfaces. See AQR Subsection 94.2 Definitions – "Trackout." In addition, Holcim is mistaken that DAQ's April 4, 2022, email notification invalidated or in any way affected Permit Conditions III-D-5, III-D-8, III-D-10, or III-D-12.

Based on the foregoing, the arguments made in Holcim's Explanation should be disregarded. Permit Condition III-B-31 applies to Holcim's haul roads, and even if DAQ were enforcing Permit Condition III-B-32, DAQ would not have relied on it for NOV No. 10030 because it does not apply to unpaved haul roads.

DATED this 10th day of September, 2024.

STEVEN B. WOLFSON
DISTRICT ATTORNEY

By: */s/ Catherine Jorgenson*
CATHERINE JORGENSON
Deputy District Attorney
State Bar No. 006700
500 South Grand Central Pkwy.
5th Floor, Ste. 5075
Las Vegas, Nevada 89155-2215
Attorney for Department of Environment and Sustainability, Division of Air Quality

Exhibit A

From: aqpermitting@clarkcountynv.gov
To: david.robinson@lafargeholcim.com
Cc: AQ Permitting
Subject: OFFICIAL NOTICE - Stationary Source Permit Conditions for Fugitive Dust
Date: Tuesday, April 5, 2022 11:16:20 AM

DES
DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY

04/05/2022

Re: OFFICIAL NOTICE - Stationary Source Permit Conditions for Fugitive Dust

15948, Aggregate Industries Swr Inc

Dear Responsible Official;

On Aug 17, 2021, revisions to Air Quality Regulations (AQRs) 92 and 94 took effect. Shortly afterwards, the Clark County Department of Environment & Sustainability, Division of Air Quality (DAQ) revised your air quality permit to add corresponding fugitive dust conditions into Section 2, "Controls" ("Emission Controls" in older permits) and/or Section 3, "Limitations" ("Emission Limitations" in older permits).

DAQ has determined that AQRs 92 & 94 must be revised. Until the revised rules become effective, DAQ will not take any action on the AQR 92 & 94 (fugitive dust) provisions added to your permit.

Once the revisions are approved, we will notify you of their effective date and whether any changes to your permit will be necessary. Revised permits will be reissued at no cost to the permit holder.

If you have any questions regarding this matter, please call Ted Lendis, Permitting Manager at 702-455-5942.

Thank you,

Marci Henson

Director

From: agpermitting@clarkcountynv.gov
To: william.a.snyder@lafargeholcim.com
Cc: AQ Permitting
Subject: OFFICIAL NOTICE - Stationary Source Permit Conditions for Fugitive Dust
Date: Tuesday, April 5, 2022 11:15:17 AM

DES
DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY

04/05/2022

Re: OFFICIAL NOTICE - Stationary Source Permit Conditions for Fugitive Dust

00372, Aggregate Industries Swr Inc Sloan Quarry

Dear Responsible Official;

On Aug 17, 2021, revisions to Air Quality Regulations (AQRs) 92 and 94 took effect. Shortly afterwards, the Clark County Department of Environment & Sustainability, Division of Air Quality (DAQ) revised your air quality permit to add corresponding fugitive dust conditions into Section 2, "Controls" ("Emission Controls" in older permits) and/or Section 3, "Limitations" ("Emission Limitations" in older permits).

DAQ has determined that AQRs 92 & 94 must be revised. Until the revised rules become effective, DAQ will not take any action on the AQR 92 & 94 (fugitive dust) provisions added to your permit.

Once the revisions are approved, we will notify you of their effective date and whether any changes to your permit will be necessary. Revised permits will be reissued at no cost to the permit holder.

If you have any questions regarding this matter, please call Ted Lendis, Permitting Manager at 702-455-5942.

Thank you,

Marci Henson

Director

Additional Material Item #4
Distributed 9/16/2024
S. Rogge, Admin. Secretary

DES
DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY

REPORT BY DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY STAFF (January 1 – August 31, 2024)

➢ Planning

- **Criteria Pollutants**
  - **Carbon Monoxide (CO) - attainment/maintenance**
  - **Ozone (O_3)**
    - **1997 O_3 NAAQS- attainment/maintenance:**
      - 2nd 10-year maintenance plan was approved by EPA in April 2024.
    - **2015 O_3 NAAQS:**
      - An attainment plan showing how we meet the moderate nonattainment area requirements is posted for public comment until September 16, 2024.
      - This plan is expected to go to the BCC for consideration and approval on November 5, 2024, and will be submitted to EPA shortly thereafter.
      - The final rulemakings associated with this plan are anticipated to be complete by the end of this year.
      - The attainment deadline for moderate nonattainment was August 3, 2024, and air quality data shows we did not meet the standard (mainly due to exceedances caused by wildfires). We expect to be reclassified to a "serious" nonattainment area any time before February 2025.
      - The reclassification will require us to develop a new plan including data collection and analysis, modeling, stakeholder and public input, and adoption of new air quality rules to control emissions.
      - You can follow the developments of our plan at: https://www.clarkcountynv.gov/government/departments/environment_and_sustainability/division_of_air_quality/planning/ozone_attainment_plan/index.php
  - **PM_{10}- attainment/maintenance**
    - Developing 2nd 10-year PM_{10} maintenance plan to show how DES will maintain the NAAQS through 2034. DES intends to submit the plan by close of 2024.
    - Submitted exceptional event (EE) demonstrations to exclude several high-wind exceedances that occurred between 2020 and 2023. These EE demonstrations will support our PM_{10} maintenance plan, show EPA that our current dust controls are working, and that these exceedances were due to circumstances outside of DES's control.

- **$PM_{2.5}$- attainment**
  - The $PM_{2.5}$ annual NAAQS was revised in February 2024, and DES is currently in attainment. Final attainment determinations will be made using 2022-2024 data, which will not be finalized until 2025.
- **Nitrogen dioxide (NO_2) – attainment**
- **Sulfur dioxide (SO_2) – attainment**
- **Lead (Pb) – attainment**

- **Studies:**
  - The in-house $PM_{2.5}$ fingerprinting study to identify significant sources of $PM_{2.5}$ in the Las Vegas Valley is continuing. Phase 1 has been completed, and Phase II is underway.
  - The VOC smoke tracer study is being continued. This study supports anticipated EE demonstrations and O_3 modeling. 2023 results are available, and 2024 data is being analyzed.
  - A wood stove/fireplace study has been initiated, which is intended to survey residential wood-smoke emission sources. DES may consider further steps based on findings.

- **Performance Metrics for January 1, 2024 – August 31, 2024**
  - Increment Modeling: 13 major, 84 minor source reviews
  - Review/Analysis of agency air quality actions: approx. 113

- **Smog Free Clark County**
  - DES funded a 1-year pilot program to assist low-income residents with smog emission repairs.
  - The program originally launched in January 2023 and ended June 2024. Mid-year, the program expanded the model years eligible to participate from 1995 to 1999.
  - A total of 164 vouchers were redeemed.
    The program has been relaunched for a 2nd year beginning in the new fiscal year, July 2024.

➢ **Monitoring**

- Implemented 2024 Annual Monitoring Network Plan
  - Stations located in neighbourhoods to assess exposure levels to the general population (18 AQ stations).
  - Network characterized pollution transported into Clark County and background levels natural to Clark County.

- Deployed Photochemical Assessment Monitoring Stations (PAMS) monitoring of ozone precursors NO_2 and VOCs, carbonyls, mixing layer, and solar/UV radiation.
- Conducted additional ozone monitoring at Apex, Spring Mountain Youth Camp (SMYC) and Indian Springs during ozone season (April 1st – September 30th)
- Deployed trace CO monitors at Joe Neal and SMYC during ozone season (April 1st – September 30th).
- Commenced second year of County-wide monitoring study of wildfire tracers including VOCs, carbonyls, and L-glucosan (April 1st – September 30th).

- Optimized air monitoring network data acquisition system (DAS)
  - Optimized DAS hardware and software network wide, added in-depth calibration reports.
  - Upgraded public AQ monitoring website.
  - Implemented Assets Tracking module.

- Completed 2025 ozone monitoring waiver (waiting for EPA approval)
  - EPA granted ozone monitoring exemption for Indian Springs and Apex in 2025 (off ozone season).

- Applied for EPA grants to replace four aging AQ monitoring stations under Inflation Reduction Act (IRA).
- Applied and received EPA grant to purchase Carbonaceous Aerosols Speciation analyzer to characterize composition of $PM_{2.5}$ in the Las Vegas Valley. Instrument operates at Casino Center site.
- Presented two posters at EPA National Air Monitoring Conference in New Orleans, LA: PM analyzers comparison study and $PM_{2.5}$ speciation in LV Valley.
- Other studies
  - Worked on final report from in-house $PM_{2.5}$ fingerprinting study to identify significant sources contributing to $PM_{2.5}$ in the Las Vegas Valley, continue to work on the final report.

➢ **Stationary Source Permitting**

- Completed 458 stationary source permitting actions (January-August 2024)
- Issued 453 permitting actions complying with regulatory deadline (98.9%) and meeting the department goal of 90%
- As of August 30, 2024, there were 1,155 active stationary source operating permits. This includes 34 Title V operating permits
- Program Highlights (January-August 2024)

- Promoted an existing team member to Major Source Supervisor, effective March 4, 2024.
- Promoted a current employee to Senior Air Quality Specialist and hired a new Air Quality Specialist.
- Started recruitment process for a Senior Air Quality Specialist to fill an existing vacancy and for two new Air Quality Specialists.
- The Control Techniques Guideline (CTG) rules took effect in April 2024. According to these rules, stationary sources that fall under CTG regulations and do not meet the permitting emissions threshold outlined in AQR 12.1 must register with the DAQ. To facilitate this, a new CTG Registration Program was launched on April 2, 2024. This program introduced a range of customer support tools, including application forms, fact sheets, and rule interpretation flow diagrams. Additionally, the DAQ database, AirTrax, was updated to support the new registration program.
- The renewal process for the gasoline dispensing facility (GDF) general permit has been initiated. The existing general permit and authority to operate (ATO) for around 400 GDFs are set to expire on March 15, 2025. To address permitting requirements separately for attainment and nonattainment areas, and to include enhanced vapor recovery controls for both existing and new GDFs when hydrographic area 212 becomes a serious nonattainment area, seven distinct categories of GDF general permits have been established.

➢ **Compliance: Dust Permits and Vacant Land**

- Issued 2,123 dust permits from January 2024 through August 2024; averaged 5.8 days to issue a dust permit.
- Conducted 4,841 construction inspections from January 2024 through August 2024.
- As of September 11, 2024, there were 1,895 active permits with a total of 24,800.64 acres of permitted area.
- Hired two new Air Quality Specialists (Inspectors).

➢ **Compliance: Stationary Sources, Complaints and Enforcement**

- Conducted 528 stationary source inspections from January 2024 through August 2024.
- Received and responded to 609 complaints from January 2024 through August 2024; responded to 609 (100%) complaints within 24-hrs.
- 117 Notices of Violation (NOVs) issued from January 2024 through August 2024:
  - 69 for construction
  - 41 for stationary sources
  - 7 for asbestos

- Recommended $573,726.04 in penalties from January 2024 through August 2024. Hearing Officer levied $273,025.00.
  - $275,384.04 has not yet been adjudicated.
  - Out of the 82 NOVs issued between January 2024 through August 2024, 23 resulted from complaints which is approximately 20%.

- **Major initiatives**
  AQMS Upgrade Project: Database development project started in late 2019 to replace the outdated database system for managing dust control permitting, complaint processing, dust classes, and air quality compliance inspections for construction site, vacant land, and asbestos projects. Phases I through III of the project were completed September 2022. Phase IV was completed in June 2024 which included development of additional database modules for the vacant land and asbestos programs, and dust monitor training classes. Phase V work is expected to start in October 2024.

➢ **Small Business Assistance Program**

- Responded to 1,388 requests for assistance (774 for permitting assistance and 614 for compliance assistance) from January through August 2024.
- SBAP provided the following virtual workshops:
  - Annual Reports for Minor Sources 1/24/2024
  - Gasoline Dispensing Operation (GDO) Daily Inspections 2/21/2024
  - Compliance Boot Camp for Minor Sources 3/20/2024
  - Gasoline Dispensing Facilities (GDF) Daily Inspections 4/24/2024
  - Permitting 101 for Minor Sources 5/22/2024
  - Gasoline Dispensing Facilities (GDF) Daily Inspections 6/12/2024
  - Preparing for a Minor Source Permit Inspection 7/23/2024
  - Air Quality Regulation (AQR) Updates 8/20/2024
- SBAP will provide the following additional virtual workshops:
  - Gasoline Dispensing Facility (GDF) Daily Inspections 9/17/2024
  - GDF New AQR and General Permit Renewal 10/8/2024
  - Annual Billing Checkup 10/22/2024
  - Gasoline Dispensing Facilities (GDF) Daily Inspections 11/19/2024
- The SBAP staff work primarily from the office. We are meeting with customers with walk-in questions, visiting their businesses, and continue offering assistance via phone calls, emails, and virtual meetings

➢ Regulations Updates

- DES amended existing Air Quality Regulations (AQRs) and promulgated new AQRs to satisfy RACT and 15% ROP requirements for the 2015 O_3 Moderate Attainment SIP. DES also amended previously submitted AQRs to address corrections required for full EPA-approval.
  - Section 0, "Definitions," amendment effective 3/5/2024
  - Section 12.0, "Applicability and General Requirements for Permitting Stationary Sources," amendment effective 3/5/2024
  - Section 12.1, "Permitting Requirements for Minor Sources," amendment effective 3/5/2024
  - Section 12.11, "General Permits for Minor Sources," amendment effective 3/5/204
  - AQR Section 101, "VOC Emissions Controls for Industrial Adhesives Operations," adopted 3/19/2024, effective 4/2/2024
  - AQR Section 102, "Gasoline Dispensing Facilities," adopted 3/19/2024, effective 4/2/2024
  - AQR Section 103, "VOC Emissions Controls for Miscellaneous Metal or Plastic Parts Coating Operations," adopted 3/19/2024, effective 4/2/2024
  - AQR Section 104, "VOC Emissions Controls for Industrial Cleaning Solvent Operations," adopted 3/19/2024, effective 4/2/2024
  - AQR Section 105, "VOC Emissions Controls for Metal Solvent Degreasers," adopted 3/19/2024, effective 4/2/2024
  - AQR Section 106, "VOC Emissions Controls for Offset Lithographic, Letterpress, and Flexible Package Printing and Other Graphic Art Operations," adopted 5/7/2024, effective 5/21/2024
  - AQR Section 107, "VOC Emissions Control for Cutback Asphalt Manufacturing and Use," adopted 3/19/2024, effective 4/2/2024
  - AQR Section 130, "Architectural and Industrial Maintenance (AIM) Coatings," adopted 8/6/2024, effective 8/20/2024

- DES is in the process of amending the following AQRs to satisfy RACT requirements for the 2015 O_3 Moderate Attainment SIP and amend the delegated federal regulations to incorporate federal updates. The Board of County Commissioners public hearing meeting is scheduled for September 17, 2024.

- AQR Section 13, "National Emission Standards for Hazardous Air Pollutants"
- AQR Section 14, "New Source Performance Standards"

- DES is in the process of developing the following AQRs to determine subsequent RACT for major stationary sources in ozone nonattainment areas and satisfy RACT requirements for the 2015 O3 Moderate Attainment SIP. DES plans to have them ready for public review sometime in September of 2024.
  - Section 120, "Reasonably Available Control Technology Demonstration and Determination Requirements for Major Stationary Sources in Ozone Nonattainment Areas"
  - Section 121, "Reasonably Available Control Technology Determinations for Specific Major Stationary Sources in the 2015 8-hour Ozone NAAQS Moderate Nonattainment Area HA 212" (name subject to change)

➢ **Office of Sustainability**

- Updating select analyses related to the Community Sustainability and Climate Action Plan through EPA's Climate Pollution Reduction Planning Grant funding, including updating the 2019 Greenhouse Gas Emissions inventory with 2022 data.
- Received funding through DOE's Energy Efficiency Community Block Grant to pilot home and building improvement program to assist underserved community members in increasing home energy efficiency. Program is being designed and is anticipated to kick off in 2025.
- Applied for EPA's Climate Pollution Reduction Implementation Grant for a County-wide home and building improvement fund to assist underserved community members in increasing home energy efficiency. This grant was not funded.
- Continuing regional climate collaboration through monthly meetings with collaborative participants.
- Submitted application for full Clean Cities and Communities designation through DOE, continue to develop and implement actions related to clean fuels under this program.
- Continue to implement County employee education and engagement program.
- Developing and implementing community outreach and engagement to increase climate change literacy within the community.

- Launching a Community Canopy program, partnering with Arbor Day Foundation, to provide ~4,000 trees directly to community to address urban heat island. Program launching 9/23.
- Hired a new Office of Sustainability Manager, starting 9/16.
- Hired a new Environmental Specialist, starting October.

➢ Public Information and Outreach

▪ Earned Media

- **News releases.** Sixteen news releases and one public event media advisory were issued.
- **Total mentions.** DES has been mentioned and/or appeared in local media (print, radio, broadcast) more than 52 times. This includes stories on local, Spanish-speaking media, covering multiple topics, such as:
    - Local air quality. Including alerts and advisories
    - Sustainability policy initiatives
    - Sustainability policy, outreach events and initiatives

▪ Social Media

- **Facebook**
    - Reach: 17,000+
    - Reactions: 525
    - Followers: 62
- **Instagram**
    - Reach: 20,000+
    - Reactions: 1,486
    - New followers: 155
- **Twitter**
    - Reach: 106,000+
    - Reactions: 1,289
    - New followers: 274

▪ Promoted Social Media

- We sponsored one social media campaign in 2024.

CAMPAIGN	MONTH	Link Clicks	Reach	Budget	Cost per Link Click
EV Webinars	MAR/APR	499	31,911	$500.00	$0.80

- **In-Person Outreach**

  - Air Quality held partnered with the American Lung Association in Nevada for the annual Climb for Air: Scale the Strat event. In addition to tabling at the event, DES fielded a team of participants who climbed the 1,409 stairs of the Strat tower under the team name: Department of STAIR Quality.
    - Cost for partnership: $10,000.

Date	Event	Engagements
Sunday, Feb. 24, 2024	Scale the Strat	250

Clark County Air Pollution Control Hearing Board

Clark County Building Department
Presentation Room
4701 West Russell Road
Las Vegas, NV 89118

September 16, 2024 – 1:30 P.M.

Agenda

Note:

- Items on the agenda may be taken out of order.
- The Air Pollution Control Hearing Board may combine two (2) or more agenda items for consideration.
- The Air Pollution Control Hearing Board may remove an item from the agenda or delay discussion relating to an item at any time.
- No action may be taken on any matter not listed on the posted agenda.
- Please turn off or mute all cell phones and other electronic devices.
- Please take all private conversations outside the room.
- With a forty-eight (48) hour advance request, a sign language interpreter or other reasonable efforts to assist and accommodate persons with physical disabilities, may be made available by calling (702) 455-0354, TDD at (702) 385-7486, or Relay Nevada toll-free at (800) 326-6868, TD/TDD
- Supporting material provided to the Board members for this meeting may be requested from Sherrie Rogge, Administrative Secretary, at sherrie.rogge@clarkcountynv.gov or (702) 455-0354.
- Supporting material is also available at the Clark County Department of Environment & Sustainability, 4701 West Russell Road, 2nd Floor, Las Vegas NV 89118.
- Supporting material is/will be available on the Department's website at: https://www.clarkcountynv.gov/government/departments/environment_and_sustainability/compliance/enforcement_notices.php

Hearing Board Members	Daniel Sanders, Chair Ryan L. Dennett, Esq., Vice-Chair Daniel Bartlett Donald Bordelove Elspeth Cordua Troy Hildreth Amy Lahav
Hearing Board Counsel	Nichole Kazimirovicz Tyler T. Smith
Air Quality Staff	Marci Henson, Director Shibi Paul, Compliance & Enforcement Manager Anna Sutowska, Air Quality Supervisor
Department Counsel	Catherine Jorgenson
Administrative Secretary	Sherrie Rogge, Phone: 702-455-0354; Email sherrie.rogge@clarkcountynv.gov Business Address: Clark County Department of Environment & Sustainability, 4701 W. Russell Road, 2nd Floor, Las Vegas NV 89118

1. **CALL TO ORDER**

2. **PUBLIC COMMENT**

This is a period devoted to comments by the general public about items on this agenda. No discussion, action, or vote may be taken on this agenda item. You will be afforded the opportunity to speak on individual Public Hearing Items at the time they are presented. If you wish to speak to the Board about items within its jurisdiction but not appearing on this agenda, you must wait until the "Comments by the General Public" period listed at the end of this agenda. Comments will be limited to three (3) minutes. Please step up to the speaker's podium, if applicable, clearly state your name and address and please **spell** your last name for the record. If any member of the Board wishes to extend the length of a presentation, this will be done by the Chairperson or the Board by majority vote.

3. **APPEAL OF HEARING OFFICER DECISION**

HOLCIM – SWR, INC. (Part 70 Operating Permit, Source ID: 372) – NOV #10030 – On July 18, 2024, the Hearing Officer found Holcim - SWR, Inc., in violation of their 2022 Permit condition III.B.31 for allowing controllable particulate matter from the Haul Road (Emission Unit: H06) to become airborne, as identified by Air Quality Specialist Joshua Frye during a complaint investigation on May 29, 2024 at the sand and gravel, hot mix asphalt, and ready-mix concrete operation known as Holcim – SWR Inc.: Sloan Quarry located at 5300 Sloan Road, in Clark County, Nevada. The Hearing Officer assessed a penalty amount of $1,500.00 with $750.00 of that penalty held in abeyance with the stipulation that Holcim - SWR, Inc. does not violate AQRs before July 18, 2025, and pays the reduced penalty within 30 days of the date of the Hearing Officer Order. (For possible action.)

4. **REPORT BY DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY STAFF**

A. General Update.

5. **IDENTIFY EMERGING ISSUES TO BE DISCUSSED BY THE BOARD AT A FUTURE MEETING**

6. **PUBLIC COMMENT**

A period devoted to comments by the general public about matters relevant to the Board's jurisdiction will be held. No vote may be taken on a matter not listed on the posted agenda. Comments will be limited to three (3) minutes. Please step up to the speaker's podium, if applicable, clearly state your name and address and please **spell y**our last name for the record. If any member of the Board wishes to extend the length of a presentation, this will be done by the Chairperson or the Board by majority vote.

7. **ADJOURNMENT**

The Presentation Room is accessible to individuals with disabilities. Within forty-eight (48) hour advanced request, a sign language interpreter may be made available by contacting (702) 455-0354 or TDD (702) 385-7486 or Nevada Relay toll-free (800) 326-6868, TT/TDD. Assistive listening devices are available upon request.

This meeting has been properly noticed and posted online at: https://clarkcountynv.gov/government/departments/environment_and_sustainability/compliance/enforcement/notices.php and Nevada Public Notice at https://notice.nv.gov/ and in the following location:
Clark County Operations Center, West, 4701 W. Russell Road, Las Vegas, Nevada (Principal Office)

Holcim – SWR, Inc.
(Part 70 Operating Permit, Source ID: 372)

Appeal of NOV #10030

Table of Contents

REQUEST FOR HEARING BEFORE THE CLARK COUNTY AIR POLLUTION CONTROL HEARING BOARD

Appeal of Hearing Officer's Order

1. **Date of Appeal:** August 1, 2024
(Must be within 10 days of receipt of Hearing Officer Order)

Notice of Violation # 10030 Hearing Date: July 18, 2024

Hearing Officer: Holly Fic

2. **Name, address, telephone number of Appellant:**

Name: Holcim-SWR, Inc. c/o Holland & Hart LLP, Attn.: Monique Jammer
(Please print)

Address: 9555 Hillwood Drive, 2nd Floor, Las Vegas, NV 89134

Telephone: 702-222-2606 Fax: _____

Email: msjammer@hollandhart.com; ECSchilling@hollandhart.com

3. **Other person or persons authorized to receive service of notice:**

Name: Paul N. De Santis & Aaron Lund
(Please print)

Address: Holcim (US) Inc., 4675 West Teco Avenue, Suite 140, Las Vegas, NV 89118

Telephone: (702) 274-4299 Fax: _____

Email: paul.desantis@holcim.com; aaron.lund@holcim.com

4. **Type of business or activity and location of activity involved in the request:**

Activities under Part 70 Operating Permit, Source ID: 372

Location: 5300 Sloan Road, in Clark County, Nevada

5. **Reason for appeal:** ☐ **Facts alleged** ☐ **Penalty assessed** ■ **Both**

Provide a detailed explanation of the reason for your appeal:
Please see Exhibit A for detailed explanation of the reason for appeal.

6. **An application filing fee of $140.00 must accompany this application. This fee is non-refundable. Please make check payable to Division of Air Quality or DAQ and mail to 4701 W. Russell Road, Suite 200, Las Vegas, NV 89118.**

The appellant or a representative of the appellant must be present at the hearing board meeting to answer any questions by the Air Pollution Control Hearing Board Members. **Please include any supporting documentation with this form for distribution to the respective board members.**

I affirm that all statements made on this application are true and complete to the best of my knowledge.

Signature: _____ Date: Aug-1, 2024

Printed Name: Monique S. Jammer, Inc.

Title: Attorney for Holcim-SWR, Inc.

FOR OFFICE USE ONLY

Application Received on Aug 1, 2024 @ 4:14pm

Application Fee $140.00 - Check pd by credit card Received Date: 8/1/2024 SR

Clark County Nevada Department of Environment and Sustainability
4701 W Russell Road, Suite 200, Las Vegas, NV 89118
Phone (702) 455-5942 Fax (702) 383-9994
AirQuality@clarkcountynv.gov

RECEIPT

HOLCIM SWR, INC. C/O MONIQUE JAMMER, ESQ.

HOLLAND & HART, 9555 HILLWOOD DRIVE, 2ND FLOOR

LAS VEGAS, NV 89134

Invoice #	Invoice Date	Invoice By	Invoice Type	Due Date
069424	8/1/2024	SHERRIER	DUST CONTROL ENFORCEMENT	8/1/2024

Quantity	Description	Fee Code	Fee	Total
1.00	HEARING BOARD REQUEST	AGHB01	$140.00	$140.00
	08/01/2024 ONLINE MASTERCARD CREDIT CARD (7817 / P0H6QYQRT0FI)	PAYMENT		($140.00)

Notes: NOV #10030, Hearing Officer Appeal, Submitted 8/1/2024

Subtotal:	$140.00
Paid:	($140.00)
Adjustments:	$0.00
Balance Due:	$0.00

air quality

Clark County Nevada Department of Environment and Sustainability
4701 W Russell Road, Suite 200, Las Vegas, NV 89118
Phone (702) 455-5942 Fax (702) 383-9994
AirQuality@clarkcountynv.gov

INVOICE

HOLCIM SWR, INC. C/O MONIQUE JAMMER, ESQ.
HOLLAND & HART, 9555 HILLWOOD DRIVE, 2ND FLOOR
LAS VEGAS, NV 89134

Invoice #	Invoice Date	Invoice By	Invoice Type	Due Date
069424	8/1/2024	SHERRIER	DUST CONTROL ENFORCEMENT	8/1/2024

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Notes: NOV #10030, Hearing Officer Appeal, Submitted 8/1/2024

Subtotal:	$140.00
Paid:	$0.00
Adjustments:	$0.00
Balance Due:	$140.00

Mail or drop off payment to 4701 W Russell Road Suite 200, Las Vegas, NV 89118. Payments can be made by check, money order, Visa, or MasterCard. Checks and money orders must be made payable to Division of Air Quality, Air Quality or DAQ. Credit card and ACH/eCheck payments may be made in person or via the Payment Portal on the DES website.
If you have invoice questions, please contact John Hill at JHill@ClarkCountyNV.gov or 702-455-0150.

Clark County
Division of Air Quality
4701 W Russell Road, Suite 200
Las Vegas, NV 89118-2231

Source Name: DUST CONTROL PROGRAM POS
Source ID:
Invoice #: 069424
Balance Due: $140.00
Due Date: 8/1/2024

Regards,

Monique Jammer, Esq.
jammer.esq@gmail.com
+1 (725) 312-4574

Licensed in Nevada and California

Begin forwarded message:

From: Aaron Lund <aaron.lund@holcim.com>
Date: August 1, 2024 at 11:27:19 AM PDT
To: "Monique S. Jammer" <MSJammer@hollandhart.com>
Subject: Fwd: Order Confirmation

External Email

Hi Monique-

Please see this email as payment for the Sloan Quarry. Also attached is the copy of the invoice and receipt for your records.

Aaron

---------- Forwarded message ---------
From: <support@cybersource.com>
Date: Thu, Aug 1, 2024 at 11:23 AM
Subject: Order Confirmation
To: <aaron.lund@holcim.com>

<noname>

Receipt

Date: 01-08-2024
<noname> **Order Number:** ea44ee0c-0ccd-4d08-baf2-0e4ee526f507

Date: 8/1/2024 Invoice Number: 069424

Billing Information

Chanesa Chanel
5300 Sloan Road
Sloan
NV
US
89054

aaron.lund@holcim.com
702-496-5891

Payment Details

Mastercard <noname>
xxxxxxxxxxx7817 <noname>
<noname>

Order Total

Subtotal	$140.00
Service fee	$3.71
Total amount	$143.71

Program Type: Stationary Source Program Entity/Source Number: 00372 Permit Number: 00372 Company or Contact Name: Holcim Email: aaron.lund@holcim.com Phone Number: 7022744299 Address: 4675 W. Teco Ave. Suite 140 Las Vegas, NV 89118

EXHIBIT A

EXHIBIT A

BEFORE THE AIR POLLUTION CONTROL HEARING BOARD

CLARK COUNTY, NEVADA

In the Matter of the Notice of Violation # 10030 Issued to Holcim-SWR, Inc., *Appellant.*	**EXPLANATION IN SUPPORT OF APPEAL OF HEARING OFFICER HOLLY FIC'S JULY 24, 2024 ORDER**

Pursuant to Air Quality Regulations ("**AQR**") 7.4 and 7.5, Appellant Holcim-SWR, Inc. ("**Holcim**"), by and through its counsel, the law firm of Holland & Hart LLP, hereby files this Explanation in Support of its Appeal of Hearing Officer's July 24, 2024 Order concerning Notice of Violation # 10030 ("**NOV**").

INTRODUCTION

Holcim respectfully requests that the Air Pollution Control Hearing Board ("**Hearing Board**") reverse the Hearing Officer's July 24, 2024 Order for two key reasons. *First*, at the July 18, 2024 hearing ("**Hearing**"), The Department of Environment and Sustainability's Division of Air Quality ("**DAQ**") stated on the record that DAQ sent an e-mail notification to Holcim (as part of a listserv) stating that all provisions in Part 70 Operating Permit, Source ID: 372 (originally issued on November 6, 2019 and last modified on July 13, 2022) ("**2022 Permit**"), derived from AQR 92 and AQR 94 (concerning testing methods for opacity levels) were "stayed" pending revisions. Hearing Officer Holly Fic ("**Hearing Officer**") relied on this representation when issuing her decision at the Hearing and subsequent order on July 24, 2024 ("**Hearing Officer's Order**"). However, despite Holcim's formal records request to DAQ, to date DAQ has not been able to present (a) the notice or (b) confirmation that DAQ sent said notice to Holcim. As a courtesy, Holcim checked its records and has no record of such an e-mail at any time. *Second*, even assuming (without admitting) that said notice exists, the modifications therein are not simply a stay, but constitute "significant permit revisions" that require specific procedures under the AQRs—beyond a blast e-mail notice asserting without further process that said provisions are not in effect. DAQ failed to present any evidence, testimonial or otherwise,

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to establish that it followed any formal processes and procedures to modify the 2022 Permit and exclude the provisions derived from AQR 92 and 94.

In short, DAQ provided no basis to unilaterally invalidate the express requirements for assessing opacity levels for the fugitive dust emissions from the haul road, especially since those requirements provide the only validation for the violation in the NOV and the Hearing Officer's Order. Thus, as detailed below, Holcim respectfully requests that the Hearing Board (i) hold that the 2022 Permit is valid and enforceable as written; (ii) hold that DAQ failed to apply either of the opacity test methods to prove that the haul road fugitive dust (or particulate matter) exceeded opacity limits and violated the Permit or AQRs; (iii) hold that DAQ failed to follow protocol to properly implement the significant permit revisions in question; and (iv) reverse the Hearing Officer's Order entirely, rejecting any violation in the NOV and rejecting the $1,500.00 penalty assess thereunder.

BACKGROUND

I. Notice of Violation # 10030.

1. On June 26, 2024, DAQ sent the NOV to Holcim concerning Holcim's activities on May 29, 2024 at its Sloan Quarry facilities, located at 5300 Sloan Road, Clark County, Nevada ("**Facilities**"). *See* Notice of Violation (June 26, 2024), attached as **Exhibit 1**.

2. The NOV presented one violation under AQR 41.1.2 and 2022 Permit Section III.B.31. *See* Ex. 1 at pp. 1-2; *see also* Part 70 Operating Permit, Source ID: 372 (July 13, 2022), attached as **Exhibit 2**.

3. The NOV provided statements and evidence from Air Quality Specialist Joshua Frye ("**Frye**") to support the NOV, including Frye stating that he "observed a haul truck generating fugitive dust emissions on the Haul Road" of the Facilities. *See* Ex. 1 at p. 2.[1]

4. The NOV did not present any statements or evidence that DAQ followed the express procedures for assessing opacity to confirm whether the fugitive dust observed by Frye

[1] At the July 18, 2024 hearing, DAQ consented and agreed that the sole violation in the NOV relates only to the dust Frye observed from the haul road. Thus, all other observations in the NOV and evidence should be disregarded for purposes of the record and this appeal.

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constituted a Permit or AQR violation. *See generally* Ex. 1; *see also* Ex. 2 at p. 42 (Sec. III.B.32).

5. The violation stated that "[b]y allowing controllable particulate matter from the Haul Road (EU: H06) to become airborne, Holcim violated 2022 Permit condition III.B.31 (Deficiency I.B.1)." *See* Ex. 1 at p. 2. The violation also cited to Permit Section III.B.31, derived from AQR 41.1.2, which states that "[t]he permittee shall not cause or permit the handling, transporting, or storage of any material in a manner that allows or may allow controllable particulate matter to become airborne." *See* Ex. 1 at p. 2; *see also* Ex. 2 at p. 42 (Sec. III.B.31).

6. The NOV did not present statements supporting a finding that the dust observed from the haul road constitutes the type of "controllable particulate matter" that Permit Section III.B.31 contemplates. See *id.*

7. The NOV recommended a penalty of $1,500.00, based on DAQ categorizing the alleged violation as a Moderate Deviation from Requirements by a Complex Source. *See* Ex. 1 at pp. 3 & 4, Ex. A.

II. Holcim's Answer & Correspondence with DAQ.

8. Holcim submitted a timely Notice of Violation Response Form to DAQ, which contested both the facts and the penalties of the NOV. *See* Notice of Violation Response Form (June 27, 2024), attached as **Exhibit 3**.

9. On July 3, 2024, Environmental Manager Aaron Lund sent a letter to DAQ ("**July 3 Letter**") explaining that Holcim under AQR 41.1.2 and Permit Section III.B.31 as regulations and provisions "designed to cover stockpiles" (such as the material in the back of a haul truck), not "road dust" emitted from the haul truck's movement. *See* Ex. 3 at p. 2.

10. Holcim did not receive a response to its July 3 Letter.

III. The Hearing – DAQ's Arguments.

11. All parties appeared at the Hearing before the Hearing Officer. DAQ presented testimony from (a) Frye; (b) Scott Jelinek ("**Jelinek**"), Frye's supervisor; and (c) a DAQ representative who oversaw and approved the penalty calculation table ("**PCT**").

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12. Frye's testimony aligned with the evidence presented in the NOV, and further confirmed that he did not perform any testing methods to assess compliance with the opacity limits when assessing the fugitive dust from the haul road.

13. Jelinek confirmed that he recommended the NOV at issue because such a recommendation is typical under these facts, where there is a public complaint and video of emissions observed. *See* Ex. 1 at Attachments 1-3.

14. Similarly, the DAQ representative for the PCT explained that DAQ did not have a specific protocol for creating a PCT. Instead, DAQ has baseline penalties it recommends based on the source classification and the gravity of the violation. Still, she admitted that for violations under AQR 41, she always recommends a moderate penalty.

15. Lastly, DAQ argued that in 2023 (which it later corrected as April 6, 2022), DAQ sent an e-mail notice to Holcim which stated that all 2022 Permit provisions derived from AQR 92 and AQR 94 (collectively, "**Permit Opacity Provisions**") were "stayed," or invalidated, from the 2022 Permit, pending finalized revisions ("**Unconfirmed Removal**"). From DAQ's position, its Unconfirmed Revision applied to the Permit Opacity Provisions, and thus, those provisions do not apply to the NOV. Yet, DAQ presented no evidence or testimony at the Hearing that it followed any formal procedure—under the AQRs or otherwise—to effectuate a stay, invalidation, or removal if the Permit Opacity Provisions.

IV. The Hearing – Holcim's Arguments and Basis of Appeal.

16. In response, Holcim presented argument that:

a. Fugitive dust from the haul road does not constitute the type of "controllable particulate matter" that Permit Section III.B.31 contemplates—namely, emissions from the material *in* the truck.

b. Fugitive dust emissions from the *haul road* at issue in the NOV are governed by AQR 41.1.1.1, 92 and 94, as well as Permit Sections III.B.32, III.D.5, III.D.8, III.D.10, and III.D.12—not by AQR 41.1.2 and Permit Section III.B.31. Permit Section III.B.32 required DAQ to apply either the Time Average Method, Intermittent Emissions Method, or Instantaneous Method to assess whether the fugitive dust or the particulate matter exceeded opacity limits and violated the Permit or AQRs. DAQ failed to apply any test to its May 29, 2024 observations.

c. Having no evidence of receipt of the Unconfirmed Revision that invalidated the Permit Opacity Provisions, Holcim responded that such a stay affects not only the Permit Opacity Provisions, but those 2022 Permit provisions that are related

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to emission violations, which Holcim presented statements concerning its compliance therewith. *See* Ex. 2 at Secs. III.B.32, III.D.5, III.D.8, III.D.10, and III.D.12.

d. Holcim took reasonable precautions to minimize the fugitive dust from the haul road by regularly watering the haul roads in question. Indeed, Frye testified that he observed water trucks at the Facilities.

e. The visual observation of dust, at a dusty site, in an arid region that was over 90 degrees on May 29, 2024, is not enough—without using the established test methods to assess opacity levels—to prove the 2022 Permit and AQR violation presented in the NOV occurred.

f. DAQ failed to utilize any of the opacity test methods in the Permit Opacity Provisions to establish that the fugitive dust at issue exceeded opacity limits. This failure deprived Holcim of its opportunity to self-regulate and assess emissions issues on its own.

g. DAQ failed to assess the satisfactory (or deficient) nature of the reasonable precautions Holcim had in place on May 29, 2024. This failure deprived Holcim of any opportunity to evaluate and adjust the reasonable precautions in place.

h. The PCT is an internal development that is not taken on a case-by-case basis. Instead, there are default recommendations based on boilerplate review processes DAQ applies: the source, the conduct, and AQR that applies. Such an approach does not account for consequential circumstances unique to certain situations, such as the reasonable accommodations Holcim had in place, or the likelihood that Holcim could have quickly remedied the fugitive dust from the haul road.

V. The Hearing Officer's Decision and Order.

17. Despite the foregoing arguments and evidence, the Hearing Officer affirmed the NOV, and assessed a penalty of $1,500.00, with $750.00 in abeyance for a year and qualifying for waiver of $750.00 if Holcim is not found to have violated the AQRs again before July 18, 2025.

18. DAQ served the Hearing Officer's Order on July 24, 2024, but provides no findings or conclusions outside of those identified in Paragraph 17 above. *See* Order (July 24, 2024), attached as **Exhibit 4**.

19. This timely appeal follows.

ARGUMENT & EXPLANATION OF APPEAL

DAQ's claim that the Unconfirmed Revision "stays" all provisions in the 2022 Permit derived from AQR 92 and 94 is improper and cannot serve as the foundation for a violation of the Permit or the AQRs. A unilateral stay of regulatory provisions that serve as applicable

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requirements in a Title V operating permit, without any procedural requirements to adhere to, gives DAQ an unchecked, subjective basis for alleging permit violations, as it has against Holcim. Further, without the proper assessment under the Permit Opacity Provisions, DAQ has not, and cannot, establish that Holcim committed the alleged violation under the 2022 Permit or the AQRs for the haul road fugitive dust.

Not only are the AQRs crafted to protect the procedural rights of the regulated community, but any change in these applicable requirements must go through established procedures before they are applicable to Title V permit holders. DAQ's conduct surrounding the NOV and giving rise to the Order deprived all parties of procedural rights. DAQ cannot rely on its unfounded "stay" of the Permit Opacity Provisions as a basis for wholly failing to follow methodologies to assess opacity as set forth in Holcim's 2022 Permit. Based on the procedural failures and improper unilateral decisions by DAQ, detailed further below, reversal of the Hearing Officer's Order is warranted.

I. The Stay of the 2022 Permit Provisions Under AQR 92 and 94 Required a Formal Permit Revision.

Only the following revisions to the 2022 Permit do not require a formal permit revision:

- Changes by *Holcim* that do not expressly require a permit revision, where such changes do not qualify for a permit shield and Holcim provides adequate notice to the control officer and EPA (*See* AQR 12.5.2.12(a)); and
- Changes by *Holcim* under Section 502(b)(10) where Holcim provides adequate notice to the control officer and EPA (*See* AQR 12.5.2.12(b)).

To start, 2022 Permit Section V provides Holcim with a permit shield, such that if applicable requirements in effect at the time of the permit issuance are formally revised, the Permit provisions remain operative. *See* Ex. 2 at p. 60 (Sec. V). Next, neither of the foregoing circumstances apply to the Unconfirmed Revision because *DAQ*, not Holcim, issued the Unconfirmed Revision that invalidated the Permit Opacity Provisions. Indeed, at no point had Holcim requested a revision to the Permit Opacity Provisions. Thus, to stay or remove the Permit Opacity Provisions, DAQ needed to adhere to a formal process to revise the regulations or a formal permit revision process. It did not.

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II. The Unconfirmed Revision Needed to, At Least, Comply with AQR 12.5.2.15, But Failed To.

At minimum, to uphold the Unconfirmed Revision that invalidated the Permit Opacity Provisions, DAQ needed to comply with AQR 12.5.2.15. DAQ failed to do so. In relevant part, AQR 12.5.2.15 allows the Administrator or Control Officer (rather than the permit holder) to complete permit revisions if they "determine[ ] that the permit must be revised or revoked to assure compliance with the applicable requirements." *See* AQR 12.5.2.15(a)(4). Nonetheless, to stay the Permit Opacity Provisions under this regulation, DAQ needed to "follow the *same procedures* as apply to initial permit issuance," and limit the reopening to "affect only those parts of the permit for which cause to reopen exists." *See* AQR 12.5.2.15(c). Moreover, "[t]he Control Officer *shall* provide for public notice, comment, and an opportunity for a hearing on initial permit issuance, significant revisions, reopenings for cause, and renewals in accordance with the [ ] procedures" articulated under AQR 12.5.2.17(a)-(e).

As mentioned above, Holcim did not present a request to reopen the 2022 Permit to remove the Permit Opacity Provisions. Importantly, *neither did DAQ*. While DAQ may have discovered that the language under AQR 92 and 94 needed revamping, it cannot circumvent procedural due process requirements under the AQRs and related laws and regulations. Notwithstanding these specifications, at the Hearing, DAQ used its Unconfirmed Revision as a basis to claim that it "stayed" the Permit Opacity Provisions prior to issuing the NOV. However, DAQ did not follow any procedures articulated under AQR 12.5.2.15 or related regulations, including the requirements for public notice, comment, or hearing. *See* AQR 12.5.2.17(a)-(e). In sum, DAQ's failures under AQR 12.5.2.15 warrant reversing the Hearing Officer's Order that affirmed the NOV and the recommended penalty.

III. Revisions to the Permit Opacity Provisions Required that DAQ Follow the Significant Permit Revision Procedures, Which DAQ Did Not.

From a closer read of the AQRs, to substantiate the Unconfirmed Revision that invalidated the Permit Opacity Provisions, DAQ needed to follow a significant permit revision procedure. Particularly, the Unconfirmed Revision involved, among other things, "significant

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changes to existing monitoring [and] reporting… requirements" in the 2022 Permit, and changes to the "case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis." *See* AQR 12.5.2.14(a)(1)(B)-(C). Specifically, the Unconfirmed Revision by DAQ (if it exists) invalidates the standards and procedures for assessing whether fugitive dust—the particulate matter at issue—exceeded opacity limits such that the violation in the NOV is appropriate. *See* Ex. 2 at Sec. III.B.32 (establishing opacity test methods DAQ must use to confirm whether Holcim allows "fugitive dust from trackout… or from the handling, transport, or storage of any material in a manner that allows *visible emissions of particulate matter*" to exceed the permit-set opacity limits). From a policy standpoint, without knowing how DAQ will assess the fugitive dust it observes, Holcim has no possible means of preventing violation, especially in a dusty site in an arid climate that regularly reaches over 100-degree weather.

The AQRs make clear:

> At a minimum, every significant change in existing *monitoring* permit terms or conditions… *shall meet all requirements for issuance and renewal* of a Part 70 Operating Permit under Sections 12.5.2.10 and 12.5.2.11, including those for applications, public participation, review by affected states, and review by EPA, as they apply to permit issuance and permit renewal… The Control Officer shall complete review on the majority of significant permit revisions within nine (9) months after receipt of a complete application.

AQR 12.5.2.14(c)(1)-(2).

DAQ failed to ensure that the Unconfirmed Revision that invalidated the Permit Opacity Provisions met any—let alone all—requirements under AQR 12.5.2.14(c)(1)-(2). There was no application process, public participation, review by affected states, or review by EPA. Indeed, even a claim that the Unconfirmed Revision falls under AQR 12.5.2.14(b) falls flat because, again, DAQ failed to adhere to any procedural formalities thereunder.

Simply put, DAQ deprived Holcim, other affected parties, and the public of their procedural due process concerning its Unconfirmed Revision that invalidated the Permit Opacity Provisions. The AQRs are designed as a mutual protection for the permit holder, public, and the agency alike. To allow such disregard for the processes and procedures—

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established by DAQ itself—would render the applicable AQRs and 2022 Permit provisions meaningless. DAQ's actions, the NOV, and the Hearing Officer's Order should not be allowed, affirmed, or upheld in any manner. Thus, reversal is in the interest of justice and due process.

CONCLUSION

Here, both establishing the NOV violation and assessing the proper penalty hinges on whether Holcim violated the 2022 Permit and AQRs for fugitive dust from a haul road. *See* Ex. 1 at p. 2. Absent the proper assessment under the Permit Opacity Provisions, DAQ has no means to establish that Holcim committed the alleged violation under the 2022 Permit or the AQRs for the haul road fugitive dust. And under the 2022 Permit, evaluating the events on May 29, 2024 required DAQ to follow the procedures under Permit Opacity Provisions, pursuant to the corresponding AQRs. DAQ failed to do so. Instead, although no rules, permit provisions, or other regulations allow for it, DAQ claimed it issued the Unconfirmed Revision to all affected permit holders that invalidated the Permit Opacity Provisions prior to the NOV. These unilateral decisions by DAQ have cost Holcim time and the significant expense of retaining legal representation to protect its interests under the 2022 Permit and AQRs. The facts here call for this Hearing Board to reverse the Hearing Officer's Order and hold DAQ accountable for following the AQRs—regulations created by itself, for itself.

RELIEF REQUESTED

Based on the foregoing, Holcim respectfully requests that the Hearing Board issue a decision that holds and orders as follows:

I. HOLD that DAQ failed to establish that Holcim committed a violation on May 29, 2024, either under 2022 Permit Section III.B.31, III.B.32, or corresponding AQRs;

II. HOLD that DAQ failed to follow required procedures pursuant to AQR 12.5.2.15(a) and related AQRs to properly reopen the 2022 Permit to invalidate the Permit Opacity Provisions;

III. HOLD that DAQ failed to follow required procedures pursuant to AQR 12.5.2.14(c)(1)-(2) and related AQRs to properly implement a significant permit revision to the 2022 Permit to invalidate the Permit Opacity Provisions;

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IV. HOLD that the 2022 Permit is valid and enforceable as written, including the Permit Opacity Provisions;

V. ORDER that the entire Hearing Officer's Order be REVERSED;

VI. ORDER that the NOV be REJECTED;

VII. ORDER that the recommended penalty be REJECTED; and

VIII. For any such further relief that the Hearing Board deems just and proper.

Holcim thanks the Hearing Board for its time and consideration.

DATED August 1, 2024.

HOLLAND & HART LLP

/s/ Monique S. Jammer

Monique S. Jammer (Nevada Bar No. 15420)
9555 Hillwood Drive, Second Floor
Las Vegas, Nevada 89134
Phone (702) 222-2606
msjammer@hollandhart.com

Attorney for Appellant Holcim-SWR, Inc.

EXHIBIT 1

EXHIBIT 1

DES
DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY

4701 W. Russell Road 2nd Floor
Las Vegas, NV 89118-2231
Phone: (702) 455-5942 • Fax: (702) 383-9994
Marci Henson, Director

June 26, 2024

FEDERAL EXPRESS TRK #7770 8529 3263
Ahmed Hamadi, Vice President, General Manager, and Responsible Official
E-mail: ahmed.hamadi@holcim.com
Ken Kinnard, Quarry Manager and Responsible Official
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Holcim - SWR, Inc.
4675 West Teco Avenue, Suite 140
Las Vegas, NV 89118

FEDERAL EXPRESS TRK #7770 8534 7381
Kevin Peart, President
Holcim - SWR, Inc.
1687 Cole Boulevard,
Lakewood, CO 80401

NOTICE OF VIOLATION #10030

Clark County Department of Environment and Sustainability, Division of Air Quality (**Air Quality**) provides this notice to Holcim - SWR, Inc. (**Holcim**), for the violation of Clark County Air Quality Regulations (**AQRs**) and permit conditions as alleged below and recommends a civil penalty of One Thousand Five Hundred and no/100 Dollars ($1,500.00) be assessed as shown in the penalty calculation table attached hereto as **Exhibit A** and incorporated herein by reference.

I. FACTS

A. On November 6, 2019, Air Quality issued a Part 70 Operating Permit, Source ID: 372 (**2019 Permit**), to Aggregate Industries SWR, Inc., which authorized the operation of a sand and gravel, hot mix asphalt, and ready-mix concrete facility known as Aggregate Industries SWR, Inc. Sloan Quarry located at 5300 Sloan Road, in Clark County, Nevada (**Facility**). On April 16, 2020, the permit was reopened and revised to include a portable crushing and screening plant and associated diesel engine and haul road, remove the subsequent performance testing requirement for two engines, and incorporate the permit-applicable requirements of a Hearing Officer's Order (**HOO**) dated December 14, 2019, for Notices of Violation #9307 and #9312, including a restriction on the operation of certain stackers during wind events and the requirement to install and operate a dust abatement system (**2020 Permit**).

On November 24, 2021, the permit was reopened and revised to include $PM_{2.5}$ emissions for the processing operations, recently promulgated fugitive dust requirements, and emissions statements from stationary sources of NO_x and/or VOCs (**2021 Permit**). On July 13, 2022, Air Quality issued an administrative revision to the permit (**2022 Permit**) changing the company name to Holcim - SWR, Inc. and the source name to Holcim - SWR Inc.: Sloan Quarry.

B. On Wednesday, May 29, 2024, at approximately 12:20 p.m., Air Quality received a complaint (#75973) alleging Holcim was causing fugitive dust emissions (**Exh. B, Att. 1**). At approximately 1:12 p.m., Air Quality Specialist Joshua Frye (**Frye**) arrived in the area to conduct a complaint investigation. The Complaint Investigation Form (**Investigation**) is attached hereto as **Exhibit B** and incorporated herein. Approximately 15 minutes later, as he was heading northwest on Sloan Road, Frye observed a large plume of fugitive dust coming from the Facility grounds near the West Screening Plant (**Exh. B, Att. 2, Videos 1 through 3**). Frye then checked in at the main office and met with Ken Kinnard (**Kinnard**), Quarry Manager and Responsible Official for Holcim. Frye notified Kinard of his observations. Kinnard escorted Frye to the West Screening Plant. While returning to the main office, Frye observed a haul truck generating fugitive dust emissions on the Haul Road (Emission Unit (**EU**): H06) near the truck scales (**Exh. B: Att. 2, Video 4; and Att. 3, Photograph 1**). Frye departed the area at approximately 2:15 p.m. at which time he observed water trucks and street sweepers operating on the haul roads. During the Investigation, Frye identified the following deficiency:

   1. Holcim allowed controllable particulate matter from the Haul Road (EU: H06) to become airborne on May 29, 2024 (**Exh. B: Att. 2, Videos 1 through 4; and Att. 3, Photograph 1**).

C. On June 3, 2024, Frye emailed Kinnard and Ahmed Hamadi (**Hamadi**), Vice President, General Manager, and Responsible Official for Holcim, a summary of the deficiency identified during his Investigation (**Exh. B, Att. 4**).

II. VIOLATION(S)

Violation 1:

By allowing controllable particulate matter from the Haul Road (EU: H06) to become airborne, Holcim violated 2022 Permit condition III.B.31 (Deficiency I.B.1).

2022 Permit condition III.B.31 states:

> "31. The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner that allows or may allow controllable particulate matter to become airborne. *[AQR 41.1.2]*"

III. RECOMMENDED CIVIL PENALTY

Pursuant to AQR Section 9.1, any person who violates any provision of the AQRs, including any Permit condition; is guilty of a civil offense and shall pay a civil penalty not to exceed $10,000 per violation. Each day of violation constitutes a separate offense.

Air Quality recommends a civil penalty in the amount of $1,500.00 (**Exh. A**).

IV. HEARING

Air Quality has scheduled a hearing for **Thursday, July 18, 2024, at 9:00 a.m.** before the Air Pollution Control Hearing Officer to adjudicate the alleged violation(s) and, if appropriate, to levy the recommended penalty. Please complete the enclosed "**Notice of Violation Response Form**" and return it to Air Quality by July 3, 2024. At the hearing, the Hearing Officer will hear evidence on the alleged violation(s) and render a decision. The hearing will be held at the Clark County Building Services Presentation Room, located at 4701 West Russell Road, Las Vegas, Nevada.

If you intend to present any documentary evidence at the hearing, please provide copies of your evidence to Air Quality with the completed Notice of Violation Response Form. If you fail to provide copies of your evidence prior to the hearing, please be advised that Air Quality may request a continuance to have time to review the evidence you brought, which will result in the hearing being postponed and rescheduled to a later date.

If the Hearing Officer finds you in violation and levies a penalty, Air Quality staff will mail the Hearing Officer's order to you along with instructions on remittance of the penalty.

Shibi Patil (Jun 26, 2024 16:09 PDT)

for

Marci Henson,
Control Officer

Exhibit(s):
A. Penalty Calculation Table, NOV #10030
B. Air Quality Complaint Investigation Form, with attachments, dated June 5, 2024

sjg

DES
DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY
4701 W. Russell Road 2nd Floor
Las Vegas, NV 89118-2231
Phone: (702) 455-5942 • Fax: (702) 383-9994
Marci Henson, Director

Exhibit A

NOV # 10030
Penalty Calculation Table
Holcim - SWR, Inc.

Viol.	Date(s)	Violation Description	EUs or CDs	AQR Section or Permit Condition	Exhibit / Evidence	Base Penalty[1]		Days	Aggravating Description	Agg Factor	Agg Amount	Penalty
						Description	Amount					
1	May 29, 2024	Allowed controllable particulate matter to become airborne.	EU: H06	2022 Permit condition III.B.31	Exh. B: Att. 2, Videos 1 thru 4; and Att. 3, Photo 1	Complex/ Moderate	$ 1,500	1	N/A	0%	$ -	$ 1,500.00

Total Penalty: $ 1,500.00

[1]

Source Classification	Extent of Deviation from Requirement		
	Major	Moderate	Minor
Major	$ 4,000	$ 2,000	$ 1,000
Complex	$ 3,000	$ 1,500	$ 750
Significant	$ 2,000	$ 1,000	$ 500
Baseline	$ 1,000	$ 500	$ 250

Regulatory maximum: $10,000 per day, per violation
[AQR Section 9.1 & NRS 445B.640]

Complaint #: 75973	**Complaint Taken By:** CCDES
Logged Date: 05/29/24	**Logged Time:** 12:19 pm
Date Reported: 05/29/24	**Time Reported:** 12:19 pm
Date Observed: 05/29/24	**Time Observed:** 12:05 pm
Assigned Officer: Joshua Frye	**Time Assigned:** 12:25 pm

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Las Vegas, NV 89118-2231
Phone: (702) 455-5942 • Fax: (702) 383-9994
Marci Henson, Director

Exhibit B

COMPLAINT INVESTIGATION FORM

COMPLAINANT INFORMATION			COMPLAINT INFORMATION		
Name: Anonymous			**Company Name (if known):** Holcim SWR Sloan Quarry		
Address:			**Address or cross-streets:** 5300 Sloan Road		
City:	**State:**	**Zip:**	**City:** Las Vegas	**State:** NV	**Zip:** 89124
Home Phone:	**Work Phone:**		**Complaint Type:** Dust ■ Track out ☐ Overspray ☐ Leaks/Spills ☐		
E-mail:			**Odor** ☐ **Address or cross-streets of odor detection:**		
Preferred Method of Contact: Email ☐ Phone ☐			**Other** ☐		
Would you like to be contacted when the investigation is complete? Yes ☐ No ■ N/A ☐			**Facility Type:** Aggregate ■ Surface Coater ☐ Gasoline Dispensing ☐ Commercial Building ☐ Asphalt Production ☐ Marijuana Facility ☐ Chemical Manufacturing ☐ **Other** ☐		

Description of Complaint: The complaint indicated that one of the concrete facilities in the Sloan area was generating fugitive dust visible from the I-15 freeway.

INVESTIGATION SUMMARY

Is this a Permitted Source? Yes ■ No ☐ Unknown ☐ **If "Yes," Source Name:** Holcim SWR Sloan Quarry **Source ID:** 372

Name (if nonpermitted source):

Address: 5300 Sloan Road **City:** Las Vegas **State:** NV

Responsible Official: Ahmed Hamadi (VP General Manager) **Phone:** (702) 649-6250

Response Date: 05/29/24 **Time In:** 1:45 pm **Time Out:** 2:15 pm

Follow-up Investigation(s) Conducted? Yes ☐ No ■ **If "Yes," list date(s) and time(s):**

Close Out Date: 05/29/24 **Time:** 2:15 pm

Complaint Substantiated? Yes ■ No ☐
(For all odor complaints where odors were detected, complete and attach the Nuisance Odor Investigation Form)

Recommended Action: ■ Notice of Violation ☐ Warning Notice ☐ No Action Requir

Comments:

INVESTIGATION NARRATIVE

Applicable Permit:

Part 70 Operating Permit; Source ID: 372, Issued on November 6, 2019, Revised on July 13, 2022 (Permit).

Narrative:

On May 29, 2024, at 12:19 pm, Clark County Department of Environment and Sustainability (Air Quality) received Complaint #75973 via the web portal (**See Attachment 1**). The complaint indicated that there was fugitive dust coming from one of the concrete facilities in the Sloan area and was visible from the I-15 freeway. The complaint was assigned to me at 12:25 pm and I responded at 12:28 pm by departing for the area. I arrived to the area at 1:12 pm and first headed to the Cemex Construction Materials South Plant (Source ID: 15914). I observed the plant operating for approximately 15 minutes and observed no compliance issues. I then made my way to the other side of the I-15 freeway to observe other facilities in the area.

As I was heading northwest on Sloan Road, I observed a large plume of fugitive dust coming from the area of the Holcim SWR Sloan Quarry (Source ID: 372). From the parking lot of the Plant Office, I observed fugitive dust coming from the Facility grounds near the West Screening Plant (**See Attachment 2 - Videos 1-3**). I checked into the Facility and met with Ken Kinnard, Quarry Manager, at approximately 1:45 pm. I explained to Mr. Kinnard the nature of my visit and showed him the fugitive dust evidence that I had collected at that point. Mr. Kinnard escorted me to the area where the dust was coming from, but by the time we had arrived I did not observe any further dust issues. Mr. Kinnard explained that this section of the plant had been shut down for several hours and that possibly a haul truck or a loader had generated the dust I observed. As we made our way back towards the main office, we passed the truck scales where I observed a haul truck generating fugitive dust (**See Attachment 2 - Video 4 and Attachment 3 - Photograph 1**) on the Haul Road [Emission Unit (EU: H06)]. Mr. Kinnard directed the water truck crew, over his radio, to address this issue while I was in his presence. While on-site, I did observe at least one water truck and one street sweeper on-site making its way around the facility watering/cleaning the haul roads. I departed the area at 2:15 pm.

The complaint was substantiated and enforcement action is recommended. I emailed the Responsible Official a summary of the deficiency on 06/3/2024 (**See Attachment 4**).

Deficiency:

1. The Facility allowed controllable particulate matter from facility grounds and haul roads (EU: H06) to become airborne; therefore, the Facility ***was not in compliance with condition III.B.31 of the Permit.***

Note: This deficiency is recommended for formal enforcement action.

026

Joshua Frye	06/03/24	Camon Liddell	06/03/24	Scott Jelinek	06/05/24
Compliance Officer	**Date**	**Senior Review**	**Date**	**Supervisor Review**	**Date**

Attachments

Attachment 1: Complaint #75973.

Attachment 2: Videos 1-4.

Attachment 3: Photograph 1.

Attachment 4: Deficiency email dated on 06/03/2024.

Attachment 1

Complaint No. 75973

OBSERVED ON
May 29, 2024 12:05 PM

REPORTED ON
May 29, 2024 12:19 PM

COMPLAINT DESCRIPTION
A large dust cloud appears to be coming from a cement plant near Sloan, NV. It's visible from the I15 freeway.

PROBLEM LOCATION
I15 Southbound at Sloane

INTAKE METHOD
Online

TYPE
Fugitive Dust

IS THE FUGITIVE DUST OCCURRING NOW?
Yes

DO YOU KNOW WHAT IS CREATING THE FUGITIVE DUST?
Stockpiling

CATEGORY
Stationary Source Program

ASSIGNED TO
Joshua Frye

Response

RESPONDED ON
May 29, 2024 12:28 PM

CLOSED ON
May 29, 2024 2:15 PM

Location

STATIONARY SOURCE
HOLCIM SWR SLOAN QUARRY (00372)

5300 SLOAN RD, LAS VEGAS, NV 89124

TYPE
AGGREGATE PROCESSING

NAICS CODE
212321

ADDRESS
5300 Sloan Rd., Sloan, NV 89124

PARCEL NUMBER
—

MAJOR CROSS STREETS
—

Complainant

NAME
None

EMAIL
—

COMPLAINANT WANTS INVESTIGATION FINDINGS?
No

Attachment 2

Video 1: Wide angle view of fugitive dust coming from Facility grounds [Video taken by Joshua Frye]

Video 2: Wide angle view of fugitive dust coming from Facility grounds [Video taken by Joshua Frye]

Video 3: Wide angle view of fugitive dust coming from Facility grounds [Video taken by Joshua Frye]

Video 4: View of fugitive dust created by haul truck on Haul Road (EU: H06) [Video taken by Joshua Frye]

Attachment 3

Photograph 1: View of fugitive dust created by haul truck on Haul Road (EU: H06). [Photo taken by Joshua Frye]

Attachment 4

Joshua Frye

From:	Joshua Frye
Sent:	Monday, June 3, 2024 8:02 AM
To:	AHMED.HAMADI@HOLCIM.COM
Cc:	KEN.KINNARD@HOLCIM.COM; AQ Small Business Assistance Program
Subject:	Source Name: Holcim SWR Sloan Quarry - Source ID: 372 - Deficiency identified during Complaint Investigation
Importance:	High
Follow Up Flag:	Follow up
Flag Status:	Flagged

Dear Mr. Hamadi:

On 5/30/2024, I met with Ken Kinnard and performed a Complaint Investigation (CI) of Holcim SWR Sloan Quarry, located at 3500 Sloan Rd. During that CI, I identified the following deficiency:

1. The Facility allowed controllable particulate matter from Facility grounds and haul roads to become airborne, which is not complaint with permit condition III.B.31 of the Part 70 Operating Permit issued November 6, 2019, revised July 13, 2022.

The deficiency noted above for Holcim SWR Sloan Quarry is my preliminary findings and should be corrected immediately. The Division of Air Quality **may** issue a Notice of Violation even if the deficiency is corrected. Once the CI report is internally finalized, you may receive further documentation which will officially identify all the deficiencies. If you have any questions regarding this matter, please contact me via email or call me at the telephone number below.

Also, if you need assistance to comply with your permit requirements or to understand the applicable Clark County Air Quality Regulations, you may contact our Small Business Assistance Program (SBAP), which is a free and confidential service, at (702) 455-5942, or by email at AQSBAP@ClarkCountyNV.gov.

Please confirm receipt of this email by June 6, 2024.

Sincerely,

Joshua Frye
Air Quality Specialist I, Compliance Section
Clark County Department of Environment and Sustainability
Division of Air Quality
4701 W. Russell Rd, Suite 200
Las Vegas, NV 89118
Mon-Thu 7am-5:30pm
702-901-3674 – Mobile
702-455-1641 – Office


CLARK COUNTY
NEVADA
air quality

EXHIBIT 2

EXHIBIT 2

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: 372

Holcim - SWR, Inc.: Sloan Quarry
5300 Sloan Rd.
Las Vegas, NV 89124

ISSUED ON: November 6, 2019 **EXPIRES ON: November 5, 2024**

REVISED ON: July 13, 2022

Current action: Administrative Revision

Issued to:
Holcim - SWR, Inc.
4675 W. Teco Avenue
Suite 140
Las Vegas, Nevada 89118

Responsible Official:
William Snyder, Vice President General Manager
PHONE: (702) 649-6250 FAX: (702) 642-2213
EMAIL: wllllam.a.snyder@holclm.com

NATURE OF BUSINESS:

SIC codes 1442, "Construction Sand and Gravel"; 2951, "Hot Mix Asphalt"; & 3272, "Ready Mix Concrete"
NAICS codes 212321, "Construction Sand and Gravel"; 324121, "Hot Mix Asphalt"; & 327390, "Ready Mix Concrete"

Issued by the Clark County Department of Air Quality in accordance with Section 12.5 of the Clark County Air Quality Regulations.

Theodore A. Lendis, Permitting Manager

EXECUTIVE SUMMARY

Holcim - SWR Inc.: Sloan Quarry is categorized as a synthetic minor 80 source for PM_{10}; a synthetic minor source for $PM_{2.5}$, NO_x, SO_2, and CO; and a minor source for VOCs and HAP. However, the source will continue to be classified as a Part 70 source until otherwise proposed. Emissions of regulated air pollutants at the source result from operations of mining, blasting, and processing equipment. The "Construction Sand and Gravel" processes are grouped under SIC code 1442 and NAICS code 212321. The "Hot Mix Asphalt" process falls under SIC code 2951 and NAICS code 342121. The "Ready Mix Concrete" process is covered by SIC code 3727 and NAICS code 327390.

Sloan Quarry, owned by Holcim - SWR Inc., is located in Sloan, Nevada, which is in the Las Vegas Valley airshed (Hydrographic Area 212). The Las Vegas Valley is currently designated as attainment for all pollutants except ozone; Hydrographic Area 212 was designated "marginal nonattainment" for ozone on August 3, 2018, but the designation did not result in any new requirements. The source is a categorical source due to the operation of an asphalt plant. The source is not identified as a major source for greenhouse gases.

The existing facility is situated on a 530-acre site with limestone reserves totaling approximately 600 million tons. The source includes aggregate processing (sand and gravel), concrete batch production, concrete paver production, and asphalt concrete production. The source currently operates multiple crushers, screens, stackers, and transfer belts. Mining, blasting, and hauling also occur in normal operations. Other emission units associated with operations at the source are an asphalt drum mixer, oil heater, water heater, diesel generators, portable crushing and silos.

Based on the information submitted by the applicant and a technical review performed by DAQ staff, DAQ is issuing a minor revision to Part 70 Operating Permit to Sloan Quarry.

The following table identifies the source's status based on its potential to emit each regulated air pollutant. These PTE values are not intended to be enforced as emission limits by direct measurement unless otherwise noted in Section III of this permit.

Table 1. Source-Wide Potential to Emit in Tons per Year

Pollutant	PM_{10}	$PM_{2.5}$	NO_x	CO	SO_2	VOC	HAP	H_2S	Pb
Source Total	92.68	33.13	52.31	68.27	19.15	15.41	2.67	0	0

Pursuant to AQR 12.5, all terms and conditions in Sections I–V of this permit, and all attachments, are federally enforceable unless explicitly denoted otherwise.

TABLE OF CONTENTS

LIST OF TABLES

I. ACRONYMS AND ABBREVIATIONS

Acronym	Term
AQR	Clark County Air Quality Regulation
ATC	Authority to Construct (certificate)
ATC/OP	Authority to Construct/Operating Permit
bhp	brake horsepower
BCC	Clark County Board of County Commissioners
CAO	Corrective Action Order
CE	control efficiency
CF	control factor
CFR	Code of Federal Regulations
CO	carbon monoxide
CPI-U	Consumer Price Index for All Urban Consumers
DAQ	Clark County Department of Air Quality
EF	emission factor
EPA	U.S. Environmental Protection Agency
EU	emission unit
HAP	hazardous air pollutant
hp	horsepower
MMBtu	millions of British thermal units
NO_x	nitrogen oxides
NOV	Notice of Violation
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standards
NSR	New Source Review
OP	Operating Permit
$PM_{2.5}$ / PM_{10}	Particulate matter less than 2.5 / 10 microns in diameter
ppm	parts per million
ppmvd	parts per million, volumetric dry
PSD	Prevention of Significant Deterioration
psi	pounds per square inch
PTE	potential to emit
scf	standard cubic feet

SIP	State Implementation Plan
SO_2	sulfur dioxide
TSD	Technical Support Document
UST	underground storage tank
VOC	volatile organic compound

II. GENERAL CONDITIONS

A. GENERAL REQUIREMENTS

1. The permittee shall comply with all conditions of the Part 70 Operating Permit (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; AQR 12.5.2.8(b)]*

6. The permittee shall allow the Control Officer, upon presentation of credentials, to: *[AQR 4.1 & 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 supplementary facts or corrected information. The permittee shall also provide any additional information necessary to address any requirements that become applicable to the source after it filed a complete application but before the 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)]*

B. 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. 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.

4. 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]*

5. 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)]*

6. 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)]*

7. 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)]*

C. REPORTING, NOTIFICATIONS, AND INFORMATION REQUIREMENTS

1. 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)]*

2. 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)]*

3. 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)]*

4. Upon request of the Control Officer, 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]*

5. The permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1]*

   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).

6. Stationary sources that emit 25 tons or more of nitrogen oxide (NOx) and/or 25 tons or more of volatile organic compounds (VOCs) during a calendar year from emission units, insignificant activities, and exempt activities shall submit an annual emissions statement for both pollutants. This statement 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 (i.e., the emissions inventory report). *[AQR 12.9.1]*

D. COMPLIANCE REQUIREMENTS

1. 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)]*

2. 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]*

3. 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]*

4. 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)]*

5. 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)]*

6. 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 Toxics 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 Section II.D.6(b) of this permit. 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.

7. 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 event, the permittee shall notify DAQ by phone at (702) 455-5942, by fax at (702) 383-9994, or by email at AQCompliance@ClarkCountyNV.gov.

b. Within 72 hours of the required notification, the permittee shall submit a detailed written report to DAQ containing the information required by AQR 25.6.3.

8. 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)]*

9. 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]*

E. PERFORMANCE TESTING REQUIREMENTS

1. Upon request of the Control Officer, 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. Upon request of the Control Officer, 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 Section III.E of 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. 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]*

III. EMISSION UNITS AND APPLICABLE REQUIREMENTS

A. EMISSION UNITS

1. The stationary source covered by this Part 70 OP consists of the emission units and associated appurtenances summarized in Tables III-A-1. *[NSR—ATC, Section IV-A, Condition 1 (10/18/12), Title V OP (11/6/2019), Minor Revision Application (8/22/2019)]*

Table III-A-1: Emissions Units List

ID	Rating	Description	Make	Model No.	Serial No.
Primary Feed Plant					
A001a		Blasting			
A001b		Drilling			
A001		Mining			
A02	2,100 tons/hr	Gyratory Crusher		54 x 88	720-76-1-800-3
A012		Stacker 3			
Secondary Feed Plant					
A013		VGF 2a			
A018	2,600 tons/hr	Screen S-1	Simplicity	8 x 24	3824-DM106DS-6801
A020	975 tons/hr	Crusher CR-2	Hazmag	APS-1430/KN	HU1789
A036		Conveyor System (2 belts)			
A025a	682 tons/hr	Screen S-2a	Terex	8 x 20	TRXV8203EDUFF2079
A034		Belt 7			
A026a	682 tons/hr	Screen S-3a	Terex	8 x 20	TRXV8203EDUFF2080
A035		Conveyor System (3 belts)			
A032	420 tons/hr	Crusher CR-3	Canica	155	155133-99
A037		Conveyor System (4 belts)			
A038c		Conveyor System (2 belts)			
A040		Conveyor System (2 belts)			
Overland Feed					
A041		Conveyor System (4 belts)			
A046		Conveyor System (2 belts)			
Wash Plant #1					
A080		Conveyor System (2 belts)			
A081b	640 tons/hr	Screen S-12	Cedar Rapids	6 x 20	049950
A081d	140 tons/hr	Crusher CR-10a	Unknown		Not in use
A081e		Conveyor System (2 belts)			
A081g		Conveyor System (3 belts)			
A084	350 tons/hr	Screen S-5	Cedar Rapids	7X20	TRXS7203JDUCJ1458
A093a	350 tons/hr	Screen S-6	Cedar Rapids	7 x 20	TRXS7203JDUGF2330
A102b	350 tons/hr	Screen S-7a	Cedar Rapids	7 x 20	TRXS7203JDUGF2331
A101	100 tons/hr	Screen S-9	Deister	5 x 10	860013

ID	Rating	Description	Make	Model No.	Serial No.
A089		Stockpile 1/4"			
A099		Conveyor System (3 belts)			
A091		Conveyor System (2 Belts)			
A106	175 tons/hr	Crusher 6a	Canica	100	100269-92S
A103	175 tons/hr	Crusher 7a	Canica	100	100269-93S
A107		Conveyor System (2 Belts)			
A107b		Stockpile			
A096a		Conveyor System (6 Belts)			
A092b	270 tons/hr	3 Deck Screen	Cedar Rapids	6 x 20	TSR54209GHUL152
A096	100 tons/hr	Size Screen #67/#4	Unknown		Not in use
A097		Conveyor System (2 Belts)			
A096b		Conveyor System (2 Belts)			
A096c		44" Sand Screw (spare)			
A113	330 tons/hr	Dewater Screen S10	Deister	6 x 12	910257
A114		Conveyor system (3 Belts)			
A110a		Aux Hopper			
A110b		Conveyor System (3 Belts)			
A110e		Filter Press Reject Stacker			
A110f	200 tons/hr	Reject Dewater Screen S-12	Unknown		Not in use
A110		Aux Refeed Hopper			
A111		Conveyor system (2 Belts)			
A111a		Conveyor system (4 Belts)			
Wash Plant #2					
A048		Conveyor system (5 Belts)			
A055	400 tons/hr	Screen S-4 (Wet)	Simplicity	8 x 20	3826-DM110-3395
A056	400 tons/hr	Screen S-8 (Wet)	Svedala	8 x 24	26A115
A059	150 tons/hr	Crusher CR-5 (VSI)	Canica	105	10517198
A061		Splitter BC22 & BC19			
A063	200 tons/hr	Screen S-11	TPH	8 x 16	CD12-20100
A068b		Stacker ST-5			
A067		Stacker 52			
A069		Stacker 24			
A071		Conveyor system (3 Belts)			
A120d		Conveyor system (2 Belts)			
A125	200 tons/hr	3 Size Screen	Terex	6 x 20	S174524
A125a		Conveyor system (2 Belts)			
A120b		Stockpile			
A121	350 tons/hr	Dewatering Screen	Deister	8 x 12	990483
A120	200 tons/hr	VSI Crusher CR-9	Canica	80	80400-01
A120h	200 tons/hr	VSI Crusher CR-9a	Canica	80	80400-02
A121A	350 tons/hr	3 Deck Wet Screen S-12	Cedar Rapids	6x20	049916
A122		Conveyor system (2 Belts)			
A077		Conveyor system (2 Belts)			
A050		Belt 13 (spare)			

ID	Rating	Description	Make	Model No.	Serial No.
A126a		Belt (spare) Wet			
A066		Coarse Material Washer (spare)			
A127	200 tons/hr	Dewater Screen (spare)	Deister	6 x 14	990483
Rip Rap/Miscellaneous Screening Plant					
H05c		Feeder			
H08	250 tons/hr	Screen	Trommel	Hercules	HT182
H02		Conveyor System			
H02a	250 tons/hr	Screen	Cedar Rapids	6 x 20	FSG620332
H09		Conveyor System			
H10		Reject Stacker			
H05		Conveyor System			
H11	250 tons/hr	5x16 3 Deck Screen	Simplicity	5 x 16	no info plate
H12		Conveyor System			
H13		Stacker			
H14		Stacker			
West Screen Plant					
B001a	550 tons/hr	Feed Hopper			
B001b		Conveyor System (2 Belts)			
B001c		Conveyor System (2 Belts)			
B001		Conveyor system (5 Belts)			
B006	220 tons/hr	Screen 1 ElJay	JCI	6x20	98HO2B32
B008	220 tons/hr	Screen 2 ElJay	JCI	6x20	409440
B013	220 tons/hr	Screen 3 (JCI)	JCI	6x20	50681
B051	220 tons/hr	Screen 4 (Wet Deck)	El Jay	6x20	34AO995
B053		Stacker 3			
B052	80 tons/hr	Dewater Screen	Diester	5 x 12	no info plate
B017		Stacker 2			
B033a		Conveyor system (2 Belts)			
B034	110 tons/hr	Cone Crusher (BH)	Sanvick	H6800	125892
B037		Conveyor system (2 Belts)			
B057	220 tons/hr	Screen SC-6	Cedar Rapids	6x20	34A0995
B027		Stacker ST4			
B059		Stacker ST7			
B062		Stacker ST6			
B057b		Conveyor Belt (recirc)			
B026		Conveyor system (6 Belts)			
Aux Refeed System					
B046a		Aux Refeed Hopper			
B056		Belt 9 (alt)			
Spare Units					
B003a		Reject Stacker (alt ops)			
B050		Stacking Conveyor (spare wet)			
B049		Stacking Conveyor (spare wet)			

ID	Rating	Description	Make	Model No.	Serial No.
B016		Belt 16 (spare)			
B064	400 tons/hr	Screen SC-5	Cedar Rapids	6x20	050540
B067		Stacker			
B011		Conveyor System			
B020		Conveyor System			
B035	110 tons/hr	Cone Crusher (BH)			
Type 2 Plant (Virgin and Recycle)					
C001a		Mining			
A012b	200 tons/hr	Jaw Crusher CR-10	Cedar Rapids	3054	47015
A012e		Conveyor system (2 Belts)			
C001	400 tons/hr	VGF			
C004		Conveyor system (2 Belts)			
C002	400 tons/hr	Jaw Crusher	Telsmith	5263 HIS	232M255
C005a	400 tons/hr	Screen 3 Cedar Rapids	Cedar Rapids	6 x 20	no info plate
C003b		Stacker 22			
C010b		Stacker 15			
C031		Conveyor system (2 Belts)			
C006		Splitter			
C008	275 tons/hr	Screen 1	Cedar Rapids		46980
C009	350 tons/hr	Screen 2	Cedar Rapids		46979
C012	200 tons/hr	Horz. Shaft Impact Crusher	Telsmith		232M255
C013		Conveyor system (2 Belts)			
C017		Conveyor system (3 Belts)			
C026		Conveyor system (3 Belts)			
C033		Stacker 18 (alt)[2]			
C034		Stacker 19 (alt)[2]			
C011		Belt 9 Spare			
C035		Belt 19 Spare			
Road Runner Portable Screen					
RS01		Hopper			
RS03	150 tons/hr	Road Runner Incline Screen	Road Runner	5 x 12	no info plate
RS05		Stacker 1			
RS07		Stacker 2			
RS09		Stacker 3			
Blending System					
BS01		Bin System (5 Bins)			
BS02		Conveyor System (3 Belts)			
D013d	475 tons/hr	Pugmill Mixer	Davis	1500 Dase	1069-1500
D013a		Dual Lime Silo Loading			
BS06a		Auxiliary Silo (Cement/Lime)			
BS06		Guppy Silo			
D013e		Conveyor System			

ID	Rating	Description	Make	Model No.	Serial No.
New Blending System					
BS15		Feed Hoppers (80T) 1 - 3			
BS16		Conveyor system			
BS18	400 tons/hr	Pugmill Mixer	Unknown		Not in use
BS20		Conveyor system			
Coyote Portable Plant					
CY01	250 tons/hr	Grizzly Feeder			
CY02		Conveyor System			
CY03	250 tons/hr	Screen	Cedar Rapids	6 x 20	49499
CY04		Conveyor System			
CY05		Conveyor System			
CY07		Conveyor System			
Power Generation					
A123	306 hp	Diesel Engine, DOM: pre 2006	Caterpillar	XQ225	8JJ00309
A123b	605 hp	Diesel Engine, DOM: 2008	Cummins	QSX15-G9	J080217074-F
A123c	300 kW	Electrical Generator	Caterpillar	WQ300	0GHJ00464
	480 hp	Diesel Engine, DOM: 08/2005	Caterpillar	C9	0GHJ00464
CY09	755 hp	Diesel Engine, DOM: 10/2006	Cummins	QSX15-G9	79346685
RS10	67 hp	Diesel Engine, DOM: pre 2006	Deutz	Unknown	A1412CHQR
Fugitives					
H06		Haul Roads			
G01		Stockpiles			
Miscellaneous					
MB01		Media Blasting			
FT01		Aboveground Gasoline Storage Tank (500 gal)			
FT02		Aboveground Gasoline Storage Tank (500 gal)			
Asphalt System					
D001		10 Hoppers System			
D011		2 RAP Hoppers System			
D007		Conveyor System (2 Belts)			
D008	360 tons/hr	Scalping Screen			
D012		Conveyor System (2 Belts)			
D014	450 tons/hr	Aztec Drum Mixer (BH)			
D016		6 Asphalt Silo System			
D020		Screw Conveyor			
D021		Storage			
D022		Conveyor System (2 Belts)			
D023		Conveyor System (2 Belts)			
D026	2.10 MMBtu/hr	Diesel Hot Oil Heater 16			
D027		Diesel Hot Oil Heater 17			

ID	Rating	Description	Make	Model No.	Serial No.
Silver Star Ready Mix Plant					
F001		Hopper 1			
F002		2 Conveyors System			
F004		4 Ground Hoppers Agg.			
F005		2 Conveyors System			
F012		Hopper 11			
F008		Hopper 8a			
F010		Hopper 9a			
F013		2 Conveyors System			
F014a	90 tons/hr	Central Mix			
F019		Batcher 18			
F015		Silo Fly Ash 15			
F017		Cement Silo 14			
F017a		Cement Silo 14a			
F018		Weigh Hopper			
F023	4.0 MMBtu/hr	Heater	Fire Storm		
Con-E-Co Concrete Batch Plant					
F025		Agg. Unloading Bellydump			
F026		4 Feed Hoppers System			
F027		Overhead Bins			
F027b		Weigh Hopper			
F027d		Conveyor Belt			
F028		Fly Ash Silo			
F029		Cement Silo			
F030		Guppy System (4 units)			
F031		Truck Loading			
Western Pacific Precast Ready Mix Plant (name changed from American Eagle)					
AE01		Hopper System (4 units)			
AE03		4-Compartment Bin			
AE05		Weigh Hopper			
AE06		2 Conveyors System			
AE07		Cement Silo			
AE08		Weigh Batcher			
AE09		Fly Ash Silo			
AE10	75 tons/hr	Mixer			
AE11		Truck Loadout			
CalPortland Plant 1					
STM01		Unloading Aggregate Belly dump			
STM02		Hopper System (4 units)			
STM06		5 Storage Bins System			
STM10		Weigh Hopper			
STM13		2 Cement Silos System			
STM14		Guppy Silo 11			

ID	Rating	Description	Make	Model No.	Serial No.
STM15		Fly Ash Silo 8			
STM16		Weigh Batcher			
STM18		Truck Loading			
CalPortland Plant 3					
STM44		Stacker			
STM43		Hopper			
STM50		Aggregate Bin			
STM56		Weigh Hopper			
STM57		Truck Loadout			
STM58		2 Cement Silos System			
STM60		Fly Ash Silo			
STM61		Weigh Batcher			
STM62		Truck Loading			
STM63		Guppy Silo			
STM64		Ash Guppy Silo			
STM65		Cement Silo			
Portable Crushing Plant					
PC00	500 tons/hr	VGF	Cedar Rapids	3054	4826
PC01	500 tons/hr	Jaw Crusher and Conveyor	Cedar Rapids	3054	4826
PC02	500 tons/hr	3-Deck Screen and Conveyors	Cedar Rapids	1316	416822047870-2
PC03	500 tons/hr	Cone Crusher and Conveyors	Cedar Rapids	1316	41682204787
PC04	500 tons/hr	Recycle Conveyor	Cedar Rapids	1316	41682204787
PC05	500 tons/hr	Conveyor and Stacker			
PC06	500 tons/hr	Conveyors and stacker			
PC07	500 tons/hr	Truck load/Unload			
PC08	1,556 VMT/yr	Haul Road (unpaved)			
PC09	605 HP	Diesel Engine, DOM: 2008	Cummins	QSX15-G9	79346685
	410 kW	Generator	Cummins	450DFEJ	H080217074-4

2. The units/activities in Table III-A-2 are listed as insignificant.

Table III-A-2: Insignificant Emission Units/Activities

Description
Wacker Light Plant, 12.1 hp Lombardini Diesel Engine, M/N: LTC4L, S/N: 5426621
Specialty Lighting Light Plant, 13 hp Kubota Diesel Engine, M/N: BTK64MH, S/N: L-99-8-1247
20,402 gallon Diesel AST
10,000 gallon Diesel AST
0.9 MMBtu/hr Water Heater, Natural Gas
0.9 MMBtu/hr Water Heater, Natural Gas
0.9 MMBtu/hr Power Flame Burner, Natural Gas

3. Nonroad Engines

Pursuant to 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.

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

B. EMISSION LIMITS

1. The permitee shall not allow the actual emissions from each emission unit/activity to exceed the PTE in Tables III-B-1 through III-B-12 in any consecutive 12-month period. *[NSR—ATC, Section IV-A (10/18/12), Title V OP (11/6/2019), Minor Revision Application (8/22/2019)]*

Table III-B-1 Drilling and Blasting PTE (tons per year)

EU	Description	PM_{10}	$PM_{2.5}$	NO_x	CO	SO_2	VOC	HAP
A001b	Drilling	2.55	0.15	0	0	0	0	0
A001a	Blasting	4.17	0.63	5.94	30.72	0	0	0

Table III-B-2: Primary Feed Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
A001	Mining	5,000,000	0.00120	0.008	3.00	20.00
A02	Gyratory Crusher (crushing)[1]	2,500,000	0.00010	0.00054	0.13	0.68
A02a	End dump to Gyratory Crusher	5,000,000	0.000013	0.000046	0.03	0.12
A02b	Gyr. Crusher to Stacker 3	5,000,000	0.000013	0.000046	0.03	0.12
A012	Stacker 3 to Surge Pile	5,000,000	0.000013	0.000046	0.03	0.12

[1]Approximately 50% of the five-million-ton throughput material is not processed/crushed by the gyratory crusher based on a closed side setting of 6.0 inches.

Table III-B-3: Secondary Feed Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
A013	Tunnel Belt BC-4a 3 to VGF 2a	5,000,000	0.000013	0.000046	0.03	0.12
A016	VGF 2a drop to Belt 4 (BH)[1]	4,500,000	0.0011	0.0011	0.63	0.63
A018	Screen S-1 (Simplicity) (BH)[1]	5,000,000	0.0087	0.0087	5.52	5.52
A017	Belt 4 to Screen S-1 (BH)[1]	5,000,000				
A020	Crusher CR-2 (Hazemag) (BH)[1]	1,875,000	0.0024	0.0024	0.57	0.57
A019	Screen S-1 to Crusher CR-2 (BH)[1]	1,875,000				
A021	Crusher CR-2 to Belt 6 (BH)[1]	1,875,000				
A036	Screen S-1 Underbelt to Belt 5	3,125,000	0.000013	0.000046	0.02	0.07
A022	Belt 6 Split to Belt 44 and 45	2,625,000	0.000013	0.000046	0.02	0.06

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
A025a	Screen S-2a (Cedar Rapids 8x20) (BH)	1,312,500	0.0087	0.0087	1.45	1.45
A023	Belt 44 to Screen S-2a (BH)[1]	1,312,500				
A027	Screen S-2a to Belt 46 (BH)	1,312,500				
A034	Screen S-2a underbelt to Belt 7	937,500	0.000013	0.000046	0.01	0.02
A026a	Screen S-3a (Cedar Rapids 8x20) (BH)	1,312,500	0.0087	0.0087	1.45	1.45
A024	Belt 45 to Screen S-3a (BH)[1]	1,312,500				
A028	Screen S-3a to Belt 47 (BH)[1]	1,312,500				
A035	Screen S-3a underbelt to Belt 7	937,500	0.000013	0.000046	0.01	0.02
A029	Belt 46 to Belt 8 (BH)[1]	437,500	0.0011	0.0011	0.06	0.06
A030	Belt 47 to Belt 8 (BH)[1]	437,500	0.0011	0.0011	0.06	0.06
A032	Crusher CR-3 (Canica VSI) (BH)[1]	875,000	0.0024	0.0024	0.27	0.27
A031	Belt 8 to Crusher CR-3 (BH)[1]	875,000				
A033	Crusher CR-3 to Belt 6 (BH)[1]	875,000				
A037	Belt 5 to Belt 43	3,125,000	0.000013	0.000046	0.02	0.07
A038	Belt 43 to Belt 7 or 62	3,125,000	0.000013	0.000046	0.02	0.07
A038a	Belt 62 to Belt 63	500,000	0.000013	0.000046	0.01	0.01
A038b	Belt 63 to Stockpile (Reject)	500,000	0.000013	0.000046	0.01	0.01
A038c	Belt 64 at H.S.I. oversize reject (alt)[2]	250,000	0.000013	0.000046	0.01	0.01
A038d	Stacker to Stockpile of Truck (alt ops)[2]	250,000	0.000013	0.000046	0.01	0.01
A040	Stacker 9 to Surge pile 2 (BH)[3]	5,000,000	0.0011	0.0011	0.70	0.70
A039	Belt 7 to Stacker 9	5,000,000	0.000013	0.000046	0.03	0.12

[1]"BH" denotes unit vented to baghouse. Emissions from baghouse points are computed based on 75% capture efficiency and 99.5% control efficiency.
[2]The emission unit is not included in the table subtotal. It is an alternate process that, if used, will decrease throughput from the remaining emission units.
[3]Baghouse on the stacker has a collection efficiency of 25%

Table III-B-4: Overland Feed System Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
A041	Belt Feeds 1-3 to Tunnel Belt 10	3,500,000	0.000013	0.000046	0.02	0.08
A042	Belt 10 to Overland Belt 48 (BH)[1]	3,500,000	0.0011	0.0011	0.49	0.49
A043	Overland Belt 48 to Belts 11 and 50 (BH)[1]	3,500,000	0.0011	0.0011	0.49	0.49
A045	Belt 11 Stacker to Surge Pile (WP1)	2,250,000	0.000013	0.000046	0.01	0.05
A046	Belt 50 to Stacker 51	1,250,000	0.000013	0.000046	0.01	0.03
A046a	Stacker 51 to WP2 Side Surge Pile	1,250,000	0.000013	0.000046	0.01	0.03

[1]BH denotes unit vented to baghouse. Emissions from baghouse points are computed based on 75% capture efficiency and 99.5% control efficiency.

Table III-B-5: Wash Plant #1 Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
A080	VGF 3a through 4 to Belt 25	2,000,000	0.000013	0.000046	0.01	0.05
A081	Belt 25 Tunnel to Belt 74	2,000,000	0.000013	0.000046	0.01	0.05
A081b	Cedar Rapids Screen S-12 6x20	1,350,000	0.00005	0.00074	0.03	0.50
A081a	Belt 89 to Screen S-12	1,000,000				
A081f	Belt 90 to Screen S-12	350,000				
A082c	Screen S-12 to Cone Crusher	350,000	0.00054	0.00054	0.09	0.09
A081d	Cedar Rapids Cone Crusher CR10a					
A081e	Belt 90a to Belt 90 recirc	350,000	0.000013	0.000046	0.01	0.01
A081g	Screen S-12 Underbelt to Belt 73	1,000,000	0.000013	0.000046	0.01	0.02
A082b	Belt 73 to Belt 74	2,000,000	0.000013	0.000046	0.01	0.05
A083	Belt 74 to Belts 54, 55, 30 via Surge Bin	3,000,000	0.000013	0.000046	0.02	0.07
A084[1]	Belt 54 to Wet Screen S-5	1,000,000	0.00	0.00	0.00	0.00
A093b[1]	Screens 5-7 to BC28	428,571	0.00	0.00	0.00	0.00
A085[1]	Belt 55 to Wet Screen S-6	1,000,000	0.00	0.00	0.00	0.00
A093a[1]	Screens 5-7 to BC57	500,000	0.00	0.00	0.00	0.00
A086[1]	Screens 5-7 to BC56	500,000	0.00	0.00	0.00	0.00
A093[1]	Belt 30 to Telsmith Wet Screen S-7a	1,000,000	0.00	0.00	0.00	0.00
A102b[1]	Telsmith Wet Screen S-7a	1,000,000	0.00	0.00	0.00	0.00
A108[1]	Wet Screen S-7a to twin Sand Screw	285,714	0.00	0.00	0.00	0.00
A086a[1]	Belt to Dewater Screen S-9	307,692	0.00	0.00	0.00	0.00
A101[1]	DW Screen S-9 to Stacker BC29	307,692	0.00	0.00	0.00	0.00
A075[1]	Belt 28 to Dewater Screen	428,571	0.00	0.00	0.00	0.00
A076[1]	Dewater Screen to BC41	428,571	0.00	0.00	0.00	0.00
A089[1]	Stacker BC29 to Stockpile 1/4" chips	307,692	0.00	0.00	0.00	0.00
A099[1]	Belts 56 and 57 to Belt BC31 or Belt 41	1,000,000	0.00	0.00	0.00	0.00
A091[1]	Belt 41 to Belt 36	1,000,000	0.00	0.00	0.00	0.00
A090[1]	Belt 36 to Surge Bin SB5	1,000,000	0.00	0.00	0.00	0.00
A106[1]	Canica VSI Crusher 6a	500,000	0.0024	0.0024	0.42	0.60
A103[1]	Canica VSI Crusher 7a	500,000	0.0024	0.0024	0.42	0.60
A107	Belt 59 to Belt 39 (recirc)	1,000,000	0.000013	0.000046	0.01	0.02
A107a	Belt 39 to Belt 74	1,000,000	0.000013	0.000046	0.01	0.02
A107b	Aux Sand Refeed (Loader or Stockpile)	357,142	0.000013	0.000046	0.01	0.01
A103a[1]	Belt 37 to Belt 38	357,142	0.000013	0.000046	0.01	0.01
A106a[1]	Belt 38 to Splitter	1,057,143	0.000013	0.000046	0.02	0.02
A096a[1]	Belt 31 to Belt 40	771,429	0.00	0.00	0.00	0.00
A092[1]	Belt 40 to Belt 33	771,429	0.00	0.00	0.00	0.00
A092a[1]	Belt 33 to Twin Shaft Coarse mat. Wash	771,429	0.00	0.00	0.00	0.00
A092b[1]	3 Deck Screen (wet process)	771,429	0.00	0.00	0.00	0.00
A092c[1]	Screen to Belt 34	342,857	0.00	0.00	0.00	0.00
A092d[1]	Screen to Belt 43 (alt)	285,714	0.00	0.00	0.00	0.00
A092e[1]	Screen to Stacker ST32	285,714	0.00	0.00	0.00	0.00
A096[1]	Stacker ST32 to Size Screen #67/#4	285,714	0.00	0.00	0.00	0.00
A097[1]	Belt BC34 to Stacker 35	285,714	0.00	0.00	0.00	0.00

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
A098[1]	Stacker 35 to Bin #4	285,714	0.00	0.00	0.00	0.00
A096b[1]	Belt 43 to Belt 44 (alt)	342,857	0.00	0.00	0.00	0.00
A096d[1]	Belt 44 to Belt 57 (alt)	342,857	0.00	0.00	0.00	0.00
A096c[1]	44" Sand Screw (spare)	285,714	0.00	0.00	0.00	0.00
A109[1]	Screens 5, 6, and 7 to Twin 54" Screws	1,057,143	0.00	0.00	0.00	0.00
A113[1]	Dewater Screen S10	1,057,143	0.00	0.00	0.00	0.00
A114[1]	Belt 60 to Belt 61	1,046,154	0.00	0.00	0.00	0.00
A114a[1]	Belt 61 to Stacker 42	1,046,154	0.00	0.00	0.00	0.00
A115[1]	Stacker 42 to Stockpile	1,046,154	0.00	0.00	0.00	0.00
A110a[1]	Loader to Aux Hopper	500,000	0.00	0.00	0.00	0.00
A110b[1]	Belt to Stacker	500,000	0.00	0.00	0.00	0.00
A110d[1]	Stacker to Stockpile	500,000	0.00	0.00	0.00	0.00
A110c[1]	Belt (spare)	400,000	0.00	0.00	0.00	0.00
A110e[1]	Filter Press Reject Stacker	400,000	0.00	0.00	0.00	0.00
A110f[1]	Filter Press Reject Dewater Screen S12	400,000	0.00	0.00	0.00	0.00
A110[1]	Loader to Aux Refeed Hopper	168,750	0.000013	0.000046	0.01	0.01
A111[1]	Belt 72 to Belt 74	168,750	0.000013	0.000046	0.01	0.01
A111a[1]	Filter Press discharge to Belt FP01	300,000	0.00	0.00	0.00	0.00
A111b[1]	Belt FP01 to Belt FP02	300,000	0.00	0.00	0.00	0.00
A111c[1]	Belt FP02 to Belt FP03	300,000	0.00	0.00	0.00	0.00
A111d[1]	Belt FP03 to Silt Pond	300,000	0.00	0.00	0.00	0.00

[1]Wet process (no emissions) denotes emission units processing materials with >10% moisture in the ¼" minus materials.

Table III-B-6: Wash Plant #2 Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
A048	VGF 1 and 2 to Belt 12	1,500,000	0.000013	0.000046	0.01	0.03
A049	Belt 12 Tunnel to Splitter Bin (Belt 20 & 22)	1,500,000	0.000013	0.000046	0.01	0.03
A051	Belt 22 to Belt 17	923,077	0.000013	0.000046	0.01	0.02
A053	Belt 20 to Belt 21	923,077	0.000013	0.000046	0.01	0.02
A055[1]	Screen S-4 (Wet Deck Simplicity)	923,077	0	0	0	0
A052[1]	Belt 17 to East Screen S-4	923,077	0	0	0	0
A062[1]	Screens S-4 and S-8 to Belt 53	461,538	0	0	0	0
A070[1]	Screens S-4 and S-8 to Belt 18a	461,538	0	0	0	0
A074[1]	Screens S-4, S-8, S-13 to Screw Washer	692,308	0	0	0	0
A122b	Screens S-4 and S-8 to Belt 15	461,538	0	0	0	0
A056[1]	Screen S-8 (Svedala Wet Deck)	923,077	0	0	0	0
A054[1]	Belt 21 to West Screen S-8	923,077	0	0	0	0
A057[1]	Screens S-4 and S-8 to Belt 14	346,154	0	0	0	0
A059[1]	Crusher CR-5 (Canica VSI)	346,154	0	0	0	0
A058[1]	Belt 14 to Crusher CR-5 or Belt 53	346,154	0	0	0	0
A060[1]	Crusher CR-5 to Belt 19 (recirc.)	346,154	0	0	0	0
A061[1]	Belt 19 to Splitter BC22 & BC20	346,154	0	0	0	0

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
A063[1]	Belt 53 to Screen S-11 (6 x 16)	461,538	0	0	0	0
A068[1]	Screen S-11 to Belt 24	230,769	0	0	0	0
A068a[1]	Screen S-11 to ST-5	230,769	0	0	0	0
A064[1]	Screen S-11 to Stacker 52	461,538	0	0	0	0
A068b[1]	Stacker ST-5 to Stockpile (alt)	230,769	0	0	0	0
A067[1]	Stacker 52 to Stockpile	461,538	0	0	0	0
A069[1]	Stacker 24 to Stockpile	230,769	0	0	0	0
A071[1]	Belt 18a to Belt 18b ¼" west	461,538	0	0	0	0
A071a	Belt 18b to Belt 18c	461,538	0	0	0	0
A071b[1]	Belt 18c to Stockpile or Re-Feed Hopper FH-2	461,538	0	0	0	0
A120d	Belt 72 to Belt 81	461,538	0	0	0	0
A122c	Belt 81 to Size Screen 5x16	461,538	0	0	0	0
A125	5x16 3 Size Screen Cedar Rapids	461,538	0	0	0	0
A125a	Screen Ubelt to Belt 78	461,538	0	0	0	0
A125b	Stacker 78 to Stockpile	461,538	0	0	0	0
A120b	Belt 79 to Stockpile	461,538	0	0	0	0
A065[1]	Belt 15 (¼" east) to Dewater Screen	461,538	0	0	0	0
A121[1]	Dewatering Screen	807,692	0	0	0	0
A075[1]	Screw to Dewatering Screen	692,308	0	0	0	0
A121b	Dewatering Screen to Belt 73	807,692	0	0	0	0
A120e[1]	Belt 73 to VSI Crushers CR-9 and CR-9a (splitter)	807,692	0	0	0	0
A120[1]	Canica VSI Crusher CR-9	461,538	0	0	0	0
A120h[1]	Canica VSI Crusher CR-9a	461,538	0	0	0	0
A120c[1]	Canica VSI Crushers CR-9 and CR-9a to Belt 77	807,692	0	0	0	0
A121A[1]	Belt 77 to 3x20 3 Deck Screen (wet deck)	807,692	0	0	0	0
A120a	6x20 3 Deck Wet Screen S-12	807,692	0	0	0	0
A120f	6x20 Screen to X-Belt, Wash Screw, and Recirc.	807,692	0	0	0	0
A122a	X-Belt to Stacker 78	230,769	0	0	0	0
A122	Stacker 78 to Stockpile ¼"	230,769	0	0	0	0
A077[1]	Belt 65 to Stacker 66	692,308	0	0	0	0
A078[1]	Stacker 66 to Stockpile	692,308	0	0	0	0
A050	Belt 13 (spare)	1,500,000	0.000013	0.000046	0.01	0.03
A126a	Belt (spare) Wet Process	461,538	0	0	0	0
A066[1]	Coarse Material Washer (spare)	461,538	0	0	0	0
A127	Dewater Screen (spare)	461,538	0	0	0	0

[1]Wet process (no emissions) denotes emission units processing materials with >10% moisture in the ¼" minus materials.

Table III-B-7: Rip Rap/Miscellaneous Screening Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
H05c	Loader to Feeder	150,000	0.000013	0.000046	0.01	0.01
H08	Trommel Screen Hurcules HT182	150,000	0.00005	0.00074	0.01	0.06
H02	Oversize Reject #1 - #4	150,000	0.000013	0.000046	0.01	0.01
H02a	Grizzly Screen (Loader or Conveyor Feed)	75,000	0.00005	0.00074	0.01	0.03
H09	Belt R1 to Belt R2	75,000	0.000013	0.000046	0.01	0.01
H10	Reject Stacker	32,500	0.000013	0.000046	0.01	0.01
H05	Fines Transfer Belt	32,500	0.000013	0.000046	0.01	0.01
H05a	Fines Reject Stacker	32,500	0.000013	0.000046	0.01	0.01
H11	5x16 3 Deck Screen	75,000	0.00005	0.00074	0.01	0.03
H11a	Belt R2 to 5x16 3 Deck Screen	75,000	0.000013	0.000046	0.01	0.01
H12	Fines Transfer Belt Stacker	32,500	0.000013	0.000046	0.01	0.01
H12a	Stacker to Stockpile	32,500	0.000013	0.000046	0.01	0.01
H13	Stacker to Stockpile	32,500	0.000013	0.000046	0.01	0.01
H14	Stacker to Stockpile (alt)	32,500	0.000013	0.000046	0.01	0.01

Table III-B-8: West Screen Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
B001a	Loader to Feed Hopper (alternate feed)	500,000	0.000013	0.000046	0.01	0.01
B001b	Belt to Belt Transfer (alternate feed)	500,000	0.000013	0.000046	0.01	0.01
B001c	Belt to Belt Transfer (alternate feed)	500,000	0.000013	0.000046	0.01	0.01
B001	Stockpile to Belt 1	1,500,000	0.000013	0.000046	0.01	0.03
B002	Belt 1 to Belt 3	1,500,000	0.000013	0.000046	0.01	0.03
B004	Belt 3 to Splitter Box (BH)[1]	1,500,000	0.0011	0.0011	0.21	0.21
B004a	Splitter to Belt 4 (BH)[1]	600,000	0.0011	0.0011	0.08	0.08
B006a	Splitter to Belt 5 (BH)[1]	600,000	0.0011	0.0011	0.08	0.08
B012a	Splitter to Belt 7	600,000	0.000013	0.000046	0.01	0.01
B022	Screen 1 to Belt 18	145,364	0.0087	0.0087	0.66	0.66
B006	Screen 1 ElJay (BH)[1]	600,000				
B005	Belt 4 to Screen 1	600,000				
B024	Screen 2 to Belt 19	145,364	0.0087	0.0087	0.66	0.66
B008	Screen 2 ElJay (BH)[1]	600,000				
B007	Belt 5 to Screen 2	600,000				
B039	Screen 3 to Belt 8	145,364	0.0087	0.0087	0.66	0.66
B013	Screen 3 (JCI) (BH)[1]	600,000				
B012	Belt 7 to Screen 3	600,000				
B013a	Screens 1-3 to Belt 10	300,000				
B013b	Screens 1-3 to Belt 20	300,000				
B018	Screens 1-3 to Belt 17	600,000				
B051	Belt 17 to 6x20 Screen 4 (Wet Deck)	600,000	0.000013	0.000046	0.01	0.01
B043a	Wet Screen 4 to Belt 10	136,364	0.00	0.00	0.00	0.00
B043b	Wet Screen 4 to Belt 20	136,364	0.00	0.00	0.00	0.00
B053a	Wet Screen 4 to Stacker 3 (3/8)[3]	381,818	0.00	0.00	0.00	0.00

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
B021a	Wet Screen 4 to Wash Screw[3]	218,182	0.00	0.00	0.00	0.00
B053	Stacker 3 to Stockpile (3/8)	381,818	0.00	0.00	0.00	0.00
B052	Wash Screwer to Dewater Screen	218,182	0.00	0.00	0.00	0.00
B047	Dewater Screen to Stacker 2 (CF)	218,182	0.00	0.00	0.00	0.00
B017	Stacker 2 to Stockpile (CF)	218,182	0.00	0.00	0.00	0.00
B033a	Belt 10 to Belt 11	300,000	0.000013	0.000046	0.01	0.01
B034	Belt 11 to Cone Crusher	300,000	0.0024	0.0024	0.09	0.09
B035	Cone Crusher Sanvick (BH)[1]	300,000				
B036	Cone Crusher to Belt 12	300,000				
B037	Belt 12 to Belt 9 (recirc)	300,000	0.000013	0.000046	0.01	0.01
B041	Belt 9 to Splitter Box	300,000	0.000013	0.000046	0.01	0.01
B033	Belt 20 (cross belt) to 6x20 Screen 6	600,000	0.000013	0.000046	0.01	0.01
B057	Cedar Rapids Screen SC-6 (6x20)	600,000	0.00074	0.00074	0.14	0.22
B057c	Screen SC-6 to Stacker ST4	381,818				
B058	Screen SC-6 to Stacker ST7 (#6)	300,000				
B060	Screen SC-6 to Stacker ST6 Rev	300,000				
B027	Stacker ST4 to Stockpile 1"	381,818	0.000013	0.000046	0.01	0.01
B059	Stacker ST7 to Stockpile (#6)	300,000	0.000013	0.000046	0.01	0.01
B062	Stacker ST6 to Stockpile or Belt 21 (recirc)	300,000	0.000013	0.000046	0.01	0.01
B057b	Belt 21 to Belt 11 (recirc)	300,000	0.000013	0.000046	0.01	0.01
B038	Belt 18 to Belt 13	145,364	0.000013	0.000046	0.01	0.01
B026	Belt 19 to Belt 13	145,364	0.000013	0.000046	0.01	0.01
B040	Belt 8 to Belt 13	145,364	0.000013	0.000046	0.01	0.01
B053b	Belt 13 to Belt 13a	436,364	0.000013	0.000046	0.01	0.01
B054	Belt 13a to Stacker 1	436,364	0.000013	0.000046	0.01	0.01
B031	Stacker 1 to Stockpile (CF)	436,364	0.000013	0.000046	0.01	0.01
Aux Refeed System						
B046a	Loader to Aux Refeed Hopper[2]	100,000	0.000013	0.000046	0.01	0.01
B056	Feeder Belt to Belt 9 (alt)[2]	100,000	0.000013	0.000046	0.01	0.01
Misc Spare Units						
B003a	Reject Stacker (alt ops)[2]	400,000	0.000013	0.000046	0.01	0.01
B050	Stacking Conveyor (spare wet process)[3]	600,000	0.00	0.00	0.00	0.00
B049	Stacking Conveyor (spare wet)[3]	600,000	0	0	0.00	0.00
B016	Belt 16 (spare)	300,000	0.000013	0.000046	0.01	0.01
Alternate Type II Plant (AOS) - Production through this circuit will not add to PTE						
B064	Screen SC-5 Cedar Rapids (6x20)	600,000	0.00074	0.00074	0.22	0.22
B003	Belt 2 to Screen SC-5	600,000				
B067	Screen SC-5 Underbelt to Stacker	600,000	0.000013	0.000046	0.01	0.01
B011	Belt 6 to Stacker 8 (T2)	600,000	0.000013	0.000046	0.01	0.01
B045	Stacker 8 to Stockpile (T2)	600,000	0.000013	0.000046	0.01	0.01
B020	Belt 15 Recirc to Splitter	300,000	0.000013	0.000046	0.01	0.01
B035	Cone Crusher (BH)[1]	300,000	0.0024	0.0024	0.36	0.36

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
B034	Belt 11 to Cone Crusher	300,000				
B036	Cone Crusher to Belt 12	300,000				
B037	Belt 12 to Belt 9	300,000	0.000013	0.000046	0.01	0.01

[1]BH denotes unit vented to baghouse. Emissions from baghouse points are computed based on 75% capture efficiency and 99.5% control efficiency.
[2]The emission unit is not included in the table subtotal. It is an alternate process that, if used, will decrease throughput from the remaining emission units.
[3]Wet process (no emissions) denotes emission units processing materials with >10% moisture in the ¼" minus materials.

Table III-B-9: Type 2 Plant (Virgin and Recycle) Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
C001a	Mining[1]	500,000	0.0012	0.008	0.30	2.00
A012b	Jaw Crusher CR-10	250,000	0.001	0.00054	0.13	0.07
A012e	Belt 70 to Belt 2a Overland	500,000	0.000013	0.000046	0.01	0.01
A010	Belt 2a to VGF Feeder or SP	500,000	0.000013	0.000046	0.01	0.01
A010a	Loader to VGF Feeder	500,000	0.000013	0.000046	0.01	0.01
C001	Loader to VGF	700,000	0.000013	0.000046	0.01	0.02
C003	VGF to Belt 3	700,000	0.000013	0.000046	0.01	0.02
A012d	VGF2 to Belt 70	250,000	0.000013	0.000046	0.01	0.01
C004	Belt 3 to Belt 4	700,000	0.000013	0.000046	0.01	0.02
C002	Jaw Crusher	700,000	0.0001	0.00054	0.04	0.19
C002b	VGF to Jaw Crusher	700,000				
C002a	Jaw Crusher CR-10 to BC70	700,000				
C002c	Jaw Crusher to Belt 3	700,000				
C005a	Screen 3 Cedar Rapids	700,000	0.00005	0.00074	0.02	0.26
C005b	Belt 4 to Screen 3	700,000				
C005c	Screen 3 to Stacker 22 (alt)[2]	700,000				
C005d	Screen 3 to Stacker 15 (alt)[2]	700,000				
C005e	Screen 3 to Underbelt	700,000				
C005f	Screen 3 to Belt 5	700,000				
C003b	Stacker 22 to Stockpile (alt)[2]	350,000	0.000013	0.000046	0.01	0.01
C010b	Stacker 15 to Stockpile (alt)[2]	262,500	0.000013	0.000046	0.01	0.01
C031	S3 Underbelt to Stacker	87,500	0.000013	0.000046	0.01	0.01
C036	Stacker to Stockpile	87,500	0.000013	0.000046	0.01	0.01
C006	Belt 5 to Belt 6 & 7 (splitter)	612,500	0.000013	0.000046	0.01	0.01
C008	Screen 1 Cedar Rapids	481,250	0.00005	0.00074	0.01	0.18
C007	Belt 6 to Screen 1	481,250				
C016	Screen 1 to Belt 14	481,250				
C009	Screen 2 Cedar Rapids	612,500	0.00005	0.00074	0.02	0.23
C008a	Belt 7 to Screen 2	612,500				

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
C009a	Screen1 & 2 to Belt 8	612,500				
C025	Screen 2 to Belt 21	612,500				
C012	Horz. Shaft Impact Crusher	350,000				
C012b	Belt 8 to H.S.I. Crusher	350,000	0.0001	0.00054	0.02	0.09
C012a	H.S.I. to Belt 11	350,000				
C013	Belt 11 to Belt 12	350,000	0.000013	0.000046	0.01	0.01
C013a	Belt 12 to Belt 6&7 (splitter)	350,000	0.000013	0.000046	0.01	0.01
C017	Belt 14 to Belt 18a	87,500	0.000013	0.000046	0.01	0.01
C022	Belt 18a to Stacker 17	87,500	0.000013	0.000046	0.01	0.01
C020	Stacker 17 to Stockpile	87,500	0.000013	0.000046	0.01	0.01
C026	Belt 21 to Belt 20	612,500	0.000013	0.000046	0.01	0.01
C027	Belt 20 to Belt 16	612,500	0.000013	0.000046	0.01	0.01
C019	Belt 16 to Stacker	612,500	0.000013	0.000046	0.01	0.01
C028	Stacker to Stockpile T2	612,500	0.000013	0.000046	0.01	0.01
C033	Stacker 18 (alt)[2]	87,500	0.000013	0.000046	0.01	0.01
C034	Stacker 19 (alt)[2]	87,500	0.000013	0.000046	0.01	0.01
C011	Belt 9 Spare	350,000	0.000013	0.000046	0.01	0.01
C035	Belt 19 Spare	350,000	0.000013	0.000046	0.01	0.01

[1]Mining EF based on two conveyor drop points (controlled).
[2]The emission unit is not included in the table subtotals. It is an alternate process that, if used, will decrease throughput from the remaining emission units.

Table III-B-10: Road Runner Portable Screen Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
RS01	Loader to Hopper	50,000	0.000013	0.000046	0.01	0.01
RS03	Road Runner Incline Screen	50,000				
RS02	Conveyor to Screen	50,000				
RS04	Screen to Stacker 1	50,000	0.00005	0.00074	0.01	0.02
RS06	Screen to Stacker 2	50,000				
RS08	Screen to Stacker 3	33,333				
RS05	Stacker 1 to Stockpile	16,667	0.000013	0.000046	0.01	0.01
RS07	Stacker 2 to Stockpile	16,667	0.000013	0.000046	0.01	0.01
RS09	Stacker 3 to Stockpile	33,333	0.000013	0.000046	0.01	0.01

Table III-B-11: Blending System Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
BS01	Loader to Five Bin System	500,000	0.000013	0.000046	0.01	0.01
BS02	Belt Feeders to Belt	500,000	0.000013	0.000046	0.01	0.01
BS03	Splitter to Alt Stacker (pugmill bypass)	500,000	0.000013	0.000046	0.01	0.01

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
BS03a	Stacker to Stockpile (bypass)	500,000	0.000013	0.000046	0.01	0.01
D013d	Pugmill Mixer (supplement, water, and aggregate)	517,833	0.0055	0.0055	1.42	1.42
BS05a	Belt to Pugmill	500,000	0.000013	0.000046	0.01	0.01
BS05	Auger to Pugmill	8,333	0.000013	0.000046	0.01	0.01
D013a	Dual Lime Silo Loading	9,000	0.000051	0.00034	0.01	0.01
BS06a	Auxiliary Silo (Cement/Lime)	9,000	0.000051	0.00034	0.01	0.01
BS06	Guppy Silo	8,333	0.000051	0.00034	0.01	0.01
D013e	Belt Conveyor to Stacker	517,833	0.000013	0.000046	0.01	0.01
BS08	Stacker to Stockpile	517,833	0.000013	0.000046	0.01	0.01

Table III-B-12: Blending System Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
BS15	Loader to Feed Hoppers (80T) 1 - 3	400,000	0.000013	0.000046	0.01	0.01
BS16	Belt Feeders 1 – 3 to Conveyor Belt BS-BC01	400,000	0.000013	0.000046	0.01	0.01
BS17	Conveyor Belt BS-BC01 to Twin Shaft Pugmill	400,000	0.000013	0.000046	0.01	0.01
BS18	Pugmill Mixer (mixes water and aggregate)	400,000	0.000013	0.000046	0.01	0.01
BS19	Pugmill transfer to Conveyor Belt BS-BC02	400,000	0.000013	0.000046	0.01	0.01
BS20	Conveyor Belt BS-BC02 to Stacker BS-ST1	400,000	0.000013	0.000046	0.01	0.01
BS21	Stacker BS-ST1 to Stockpile	400,000	0.000051	0.000046	0.01	0.01

2. The permittee shall not allow the actual emissions from each emission unit/activity to exceed the PTE in Table III-B-13 in any consecutive 12-month period *[Title V Application Incorporated in the OP (08/08/2017)]*

Table III-B-13: Coyote Portable Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
CY01	Loader to Grizzly	15,000	0.000013	0.000046	0.01	0.01
CY02	Conveyor to Conveyor	15,000	0.00001	0.000046	0.01	0.01
CY03	Conveyor to Screen	15,000	0.00005	0.00074	0.01	0.01
	Screen					
	Screen to Underbelt					
	Screen to Conveyor					
	Screen to Conveyor					
CY04	Conveyor 1 to Stacker 1	3,750	0.000013	0.000046	0.01	0.01
	Stacker 1 to Stockpile	3,750	0.000013	0.000046	0.01	0.01
CY05	Conveyor 2 to Stacker 2	7,500	0.000013	0.000046	0.01	0.01

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
	Stacker 2 to Stockpile	3,750	0.000013	0.000046	0.01	0.01
CY07	Underbelt Transfer to Stacker 3	3,750	0.000013	0.000046	0.01	0.01
	Stacker 3 to Stockpile	7,500	0.000013	0.000046	0.01	0.01

Note: Emissions units listed in this plant are not subject to 40 CFR Part 60, Subpart OOO, since they are not connected to any process subject to Subpart OOO.

3. The permittee shall not allow the actual emissions from each emission unit/activity to exceed the PTE in Table III-B-14 in any consecutive 12-month period *[NSR—ATC, Section IV-A, Condition 13 (10/18/12)]*

Table III-B-14: Asphalt System Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
D001	Loader to Hoppers (10 ea.)	527,340	0.000013	0.000046	0.01	0.01
D002-6d	Belt Feeders 1–6d (10 ea)	527,340	0.000013	0.000046	0.01	0.01
D011	Loader to 2 RAP Hoppers	93,060	0.000013	0.000046	0.01	0.01
D007	Conveyor 5e to Conveyor 6	527,340	0.000013	0.000046	0.01	0.01
D009	Screen to Conveyor 8 (BH)[1]	527,340	0.0011	0.0011	0.07	0.07
D008	Conveyor 6 to Scalping Screen	527,340	0.000013	0.000046	0.01	0.01
D012	Belts 9 and 10 to Conveyor 11	93,060	0.000013	0.000046	0.01	0.01
D029	Conveyor 11a to Conv. 11	93,060	0.000013	0.000046	0.01	0.01
D010	Conveyor 8 to Drum Mixer	527,340	0.000013	0.000046	0.01	0.01
D013	Conveyor 11 to Drum Mixer	93,060	0.000013	0.000046	0.01	0.01
D015	Mixer to Drag Slat Conveyor	660,000	Enclosed	Enclosed	0.00	0.00
D016	Asphalt Silo 1 Loading	110,000	0.00006	0.00006	0.01	0.01
D019e	Asphalt Silo 1 Un-Loading	110,000	0.0005	0.0005	0.03	0.03
D017	Asphalt Silo 2 Loading	110,000	0.00006	0.00006	0.01	0.01
D019e	Asphalt Silo 2 Un-Loading	110,000	0.0005	0.0005	0.03	0.03
D019a	Asphalt Silo 3 Loading	110,000	0.00006	0.00006	0.01	0.01
D019f	Asphalt Silo 3 Un-Loading	110,000	0.0005	0.0005	0.03	0.03
D019b	Asphalt Silo 4 Loading	110,000	0.00006	0.00006	0.01	0.01
D019g	Asphalt Silo 4 Un-Loading	110,000	0.0005	0.0005	0.03	0.03
D019c	Asphalt Silo 5 Loading	110,000	0.00006	0.00006	0.01	0.01
D019h	Asphalt Silo 5 Un-Loading	110,000	0.0005	0.0005	0.03	0.03
D019i	Asphalt Silo 6 Loading	110,000	0.00006	0.00006	0.01	0.01
D019j	Asphalt Silo 6 Un-Loading	110,000	0.0005	0.0005	0.03	0.03
D020	Baghouse to Screw Conveyor	250	Enclosed	Enclosed	0.00	0.00
D021	Screw Conveyor to Storage	250	Enclosed	Enclosed	0.00	0.00
D024	Screw Conveyor 21 to 22	250	Enclosed	Enclosed	0.00	0.00
D022	Silo to Screw Conveyor 22	250	Enclosed	Enclosed	0.00	0.00
D023	Screw Conveyor 1 to Conveyor 2	250	Enclosed	Enclosed	0.00	0.00

[1]BH denotes unit vented to baghouse. Emissions from baghouse points are computed based on 75% capture efficiency and 99.5% control efficiency.

4. The permittee shall not allow the actual emissions from each emission unit/activity to exceed the PTE in Table III-B-15 in any consecutive 12-month period. *[NSR—ATC, Section IV-A, Condition 14 (10/18/12)]*

Table III-B-15: Asphalt Drum Mixer PTE (tons/year)[1]

Fuel	Asphalt Throughput	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAP
Fuel Oil	660,000 tons/year	1.62	1.62	19.14	33.00	19.14	10.56	2.51
Diesel	660,000 tons/year	1.62	1.62	19.14	33.00	3.63	10.56	2.51
LPG	660,000 tons/year	1.62	1.62	12.87	33.00	1.22	10.56	2.51
	EU PTE	**1.62**	**1.62**	**19.14**	**33.00**	**19.14**	**10.56**	**2.87**

[1]Emission values based on maximum throughput of 450 tons/hr and 660,000 tons/yr. PTE is established using the fuel that results in the highest PTE (fuel oil). Emission factor (lb/ton) for PM = 0.0049 is based on performance test data plus a 25% margin. Emission factors (lb/ton) for NO_X = 0.058, CO = 0.10 are based on AP-42, Table 11.1-7 adjusted to reflect burner control system. Emission factor (lbs/ton) for SO_2 = 0.058 is based on AP-42 11.1-7 for fuel oil. Emission factors (lb/ton) for VOC = 0.032 and HAPs = 0.0076 are based on AP-42 11.1-7, 11.1-8, 11.1-9, and 1.5-1.

5. The permittee shall not allow the actual emissions from each emission unit/activity to exceed the PTE in Table III-B-16 in any consecutive 12-month period. *[NSR—ATC, Section IV-A, Condition 15 (10/18/12)]*

Table III-B-16: PTE for Asphalt Hot Oil Heaters (tons/year)[1]

EU	Fuel	Fuel Throughput	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAP
D026, D027	Propane[1]	147,294 gal/year	0.05	0.05	0.95	0.55	0.11	0.07	0.01
D026, D027	Diesel[2]	131,400 gal/year	0.22	0.22	1.31	0.33	0.02	0.02	0.01
D026, D027	Nat. Gas	163,000 gal/year	0.05	0.05	1.25	0.55	0.01	0.04	0.02
		EU PTE[3]	**0.22**	**0.22**	**1.31**	**0.33**	**0.02**	**0.02**	**0.01**

[1]Emission factors from AP-42, Table 1.5-1.
[2]Emission factors from AP-42, Tables 1.3-1, 1.3-3, and 1.3-9.
[3]PTE established using the fuel that results in the highest PTE (diesel).

6. The permittee shall not exceed the hours/year limit, nor allow the actual emissions from each emission unit to exceed the PTE in Table III-B-17 in any consecutive 12-month period. *[NSR—ATC, Section IV-A, Condition 18 (10/18/12) and NSR—ATC, Section IV-A, Condition 1 (1/31/14)]*

Table III-B-17: Calculated PTE for Diesel Generators (tons/year)

EU	Rating	Conditions	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAP
A123	306 hp	2,000 hours/year	0.07	0.07	3.34	0.29	0.01	0.77	0.01
RS10	67 hp	500 hours/year	0.03	0.03	0.52	0.11	0.01	0.04	0.01
A123b	605 hp	1,250 hours/year	0.07	0.07	4.27	0.42	0.01	0.17	0.02
A123c	480 hp	1,250 hours/year	0.10	0.10	4.56	1.72	0.00	0.75	0.01
CY09	755 hp	2,500 hours/year	0.20	0.20	8.87	1.08	0.01	2.37	0.04

7. The permittee shall maintain the engines EU: A123 and A123c as follows, unless the manufacturer's specifications are more stringent: *[40 CFR Part 63.6603(a)]*

   a. Limit concentration of CO in the stationary RICE exhaust to 49 ppmvd at 15 percent O_2; or

   b. Reduce CO emissions by 70 percent or more.

8. The permittee shall not allow the actual emissions from each emission unit/activity to exceed the PTE in Table III-B-18 in any consecutive 12-month period. *[Title V Application (00372_20160415_APP) Incorporated into the Title V]*

Table III-B-18: Silver Star Ready Mix Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
F001	Aggregate Unloading to Hopper 1	185,000	0.000013	0.000046	0.01	0.01
F002	Belt 2 to Stacker 3	185,000	0.000013	0.000046	0.01	0.01
F003	Stacker 3 to Stockpile	185,000	0.000013	0.000046	0.01	0.01
F004	Loader to 4 Comp Agg Ground Hoppers (rock/sand)	92,500	0.000013	0.000046	0.01	0.01
F007	Belt 7 to 4-Comp Agg. Bin 10	92,500	0.000013	0.000046	0.01	0.01
F009	Belt 8 to 4-Comp Agg. Bin 10	92,500	0.000013	0.000046	0.01	0.01
F011	Belt 9 to 4-Comp Agg. Bin 10	92,500	0.000013	0.000046	0.01	0.01
F005	Belt 5 to Belt 7	92,500	0.000013	0.000046	0.01	0.01
F006	Belt 6 to Belt 7	92,500	0.000013	0.000046	0.01	0.01
F012	Agg Bin 10 to Hopper 11	29,588	Enclosed	Enclosed	0.00	0.00
F008	Loader to Agg. Hopper 8a	92,500	0.000013	0.000046	0.01	0.01
F010	Loader to Agg. Hopper 9a	92,500	0.000013	0.000046	0.01	0.01
F013	Belt 12 to Belt 13	185,000	0.000013	0.000046	0.01	0.01
F014a	Loading Station Central Mix (BH)[1]	33,708	0.0011	0.0011	0.01	0.01
F019	Batcher 18 to Truck (BH)[1]	33,708	0.0011	0.0011	0.01	0.01
F015	Fly Ash 15 Loading (Bin vent)[1]	5,899	0.0049	0.0049	0.01	0.01
F017	Cement Silo 14 Loading (Bin vent)[1]	27,809	0.00034	0.00034	0.01	0.01
F017a	Cement Silo 14a Loading (Bin vent)[1]	27,809	0.00034	0.00034	0.01	0.01
F018	Weigh Batcher Loading 18 (Bin vent)[1]	33,708	0.0049	0.0049	0.02	0.02
F016	Ash Silo to Weigh Hopper 18	5,899	0.000735	0.0049	0.01	0.01

[1]BH and Bin vent denote units vented to baghouses and bin vents. Emissions from baghouse and bin vent points are computed based on 75% capture efficiency and 99.5% control efficiency.

9. The permittee shall not exceed the hours/year limit, nor allow the actual emissions from the emission unit to exceed the PTE in Table III-B-19 in any consecutive twelve month period. *[Title V Application (00372_20160415_APP) Incorporated into the Title V]*

Table III-B-19: Silver Star Ready Mix Plant Hot Water Heater PTE (tons/year)

EU	Production Limit	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAP
F023[1]	1,200 hrs/yr	0.13	0.13	0.09	0.18	0.01	0.01	0.01

[1]NO_x emissions based on 30 ppm and CO emissions on 100 ppm. All other values based on AP-42.

10. The permittee shall not allow the actual emissions from each emission unit/activity to exceed the PTE in Table III-B-20 in any consecutive 12-month period. *[NSR—ATC, Section IV-A, Condition 22 (10/18/12)]*

Table III-B-20: Con-E-Co Concrete Batch Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
F025	Agg. Unloading Belly dump	80,580	0.000013	0.000046	0.01	0.01
F026	Loader to Feed hoppers 1 - 3	80,580	0.000013	0.000046	0.01	0.01
F026a	Loader to Aux. Feed hopper	80,580	0.000013	0.000046	0.01	0.01
F027	Belts 1 - 3 to Overhead Bins	80,580	0.000013	0.000046	0.01	0.01
F027a	Aux Belt to Overhead Bins	80,580	0.000013	0.000046	0.01	0.01
F027b	Overhead Bins to Weigh hopper	80,580	0.000013	0.000046	0.01	0.01
F027c	Weigh hopper to Belt	80,580	0.000013	0.000046	0.01	0.01
F027d	Belt to Loadout Aggs	80,580	0.000013	0.000046	0.01	0.01
F028	Fly Ash Silo Loading (Bin vent)	15,300	0.0049	0.0049	0.01	0.01
F028a	Fly Ash Silo to Weigh Batcher	15,300	Enclosed	Enclosed	0.00	0.00
F029	Cement Silo Loading (Bin vent)	15,300	0.00034	0.00034	0.01	0.01
F029a	Cement Silo to Weigh Batcher	15,300	Enclosed	Enclosed	0.00	0.00
F030	Aux Guppy Loading 1–4	77,175	0.00034	0.00034	0.01	0.01
F031	Transit Truck Loading (BH)[1]	20,400	0.03	0.0263	0.07	0.07

[1]BH denotes unit vented to baghouse. Emissions from baghouses are computed based on 75% capture efficiency and 99.5% control efficiency.

11. The permittee shall not allow the actual emissions from each emission unit/activity to exceed the PTE in Table III-B-21 in any consecutive 12-month period. *[NSR—ATC, Section IV-A, Condition 22 (10/18/12)]*

Table III-B-21: Western Pacific Precast Ready Mix Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
AE01	Loader to Ground Hopper	66,702	0.000013	0.000046	0.01	0.01
	Ground Hopper to Conveyor	66,702	0.000013	0.000046	0.01	0.01
AE01a	Loader to Ground Hopper	66,702	0.000013	0.000046	0.01	0.01
	Ground Hopper to Conveyor	66,702	0.000013	0.000046	0.01	0.01
AE02	Loader to Ground Hopper	66,702	0.000013	0.000046	0.01	0.01
	Ground Hopper to Conveyor	66,702	0.000013	0.000046	0.01	0.01
AE02a	Loader to Ground Hopper	66,702	0.000013	0.000046	0.01	0.01
	Ground Hopper to Conveyor	66,702	0.000013	0.000046	0.01	0.01
AE03	Conveyor to 4-Compartment Bin	66,702	0.000013	0.000046	0.01	0.01
AE04	4-Compartment Bin to Weigh Hopper	266,809	0.000013	0.000046	0.01	0.01
AE05	Weigh Hopper to Conveyor	266,809	0.000013	0.000046	0.01	0.01
AE06	Conveyor to Conveyor	266,809	0.000013	0.000046	0.01	0.01
	Conveyor to Collecting Cone	266,809	0.000013	0.000046	0.01	0.01
AE07	Cement Silo Loading (Bin Vent)	38,617	0.00034	0.00034	0.01	0.01
	Cement Silo to Weigh Batcher	38,617	Enclosed	Enclosed	0.00	0.00
AE07a	Cement Silo Loading (Bin Vent)	38,617	0.00034	0.00034	0.01	0.01
	Cement Silo to Weigh Batcher	38,617	Enclosed	Enclosed	0.00	0.00
AE08	Cement Guppy Silo to Weigh Batcher (Bin Vent)	214,500	0.00034	0.00034	0.01	0.01

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
AE09	Fly Ash Silo Loading (Bin Vent)	14,043	0.0049	0.0049	0.01	0.01
	Fly Ash Silo to Weigh Batcher	14,043	Enclosed	Enclosed	0.00	0.00
AE10	Cement/Fly Ash Weigh Batcher to Collecting Mixer	52,660	0.0011	0.0011	0.03	0.03
AE11	Mixer to Truck Loadout (BH)	52,660	0.0263	0.0263	0.18	0.18

12. The permittee shall not allow the actual emissions from the listed activities (H06) related to vehicle miles traveled to exceed the PTE in Table III-B-22 in any consecutive 12-month period. *[NSR—ATC, Section IV-A, Condition 23 (10/18/12) and Title V Application (00372_20160415_APP) Incorporated into the Title V OP]*

Table III-B-22: Haul Road PTE

EU	Process	Road Length (miles)	Throughput (VMT/yr)	$PM_{2.5}$ PTE (ton/yr)	PM_{10} PTE (ton/yr)
H06	Aggregate	0.5	32,866	2.06	13.71
	Aggregate Haul Out	0.55	29,822		
	Type 2	0.35	10,889		
	Mine Haul	0.30	6,666		
	Asphalt	0.475	25,080		
	Portable Screen Hauling	1.0	1,100		
	Blending Systems	0.6	2,000		
	Silver Star Ready Mix	1.0	11,236		
	Silver Star Ready Mix Aggregate	1.0	1,775		
	American Eagle Ready Mix Aggregate	0.5	2,965		
	American Eagle Ready Mix Concrete	0.5	8,278		
	Rip Rap	3.0	18,000		
	Cyclone Sand	0.6	600		
	Ready-Mix Hauling	0.5	2,500		
	Admixture Haul	0.5	227		
	Cal Portland Hauling	1.0	30,000		
	Coyote Portable Haul Road	1.0	48,667		

13. The permittee shall not exceed the limit on acres at any given time, nor allow the actual emissions from this activity to exceed the PTE in Table III-B-23 in any consecutive 12-month period. *[NSR—ATC, Section IV-A, Condition 24 (10/18/12)]*

Table III-B-23: Source-wide Stockpile Area PTE for $PM_{2.5}$ and PM_{10} (tons/year)

EU	Description	Acres	$PM_{2.5}$	PM_{10}
G01	Entire Plant	51.0	2.32	15.45

14. The permittee shall not allow the actual emissions from each emission unit/activity to exceed the PTE in Table III-B-24 in any consecutive 12-month period. *[NSR—ATC, Section IV-A, Condition 29 (10/18/12)]*

Table III-B-24: CalPortland Plant 1 Emissions

EU	Description	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
STM01	Unloading Aggregate Belly dump	642,135	0.000013	0.000046	0.01	0.01
STM02	Loader to Aggregate Hopper 1a	160,534	0.000013	0.000046	0.01	0.01
STM03	Loader to Aggregate Hopper 2a	160,534	0.000013	0.000046	0.01	0.01
STM04	Loader to Aggregate Hopper 3a	160,534	0.000013	0.000046	0.01	0.01
STM04A	Loader to Aux. Hopper	160,534	0.000013	0.000046	0.01	0.01
STM06	Belt 1 to 5 Comp Storage Bin (T.P.)	160,534	0.000013	0.000046	0.01	0.01
STM07	Belt 2 to 5 Comp Storage Bin	160,534	0.000013	0.000046	0.01	0.01
STM08	Belt 3 to 5 Comp Storage Bin	160,534	0.000013	0.000046	0.01	0.01
STM08a	Belt 4 to Weigh Hopper	160,534	0.000013	0.000046	0.01	0.01
STM10	Weigh Hopper 5 to Underbelt 6	642,135	0.000013	0.000046	0.01	0.01
STM13	Cement Silo 7 Loading (bin vent)[1]	48,263	0.00034	0.00034	0.01	0.01
STM13a	Cement Silo 7a Loading (bin vent)[1]	48,263	0.00034	0.00034	0.01	0.01
STM14	Guppy Silo 11 Loading (bin vent)[1]	96,525	0.00034	0.00034	0.01	0.01
STM15	Fly Ash Silo 8 Loading (bin vent)[1]	20,475	0.0049	0.0049	0.01	0.01
STM16	Cement to Weigh Batcher (bin vent)[1]	96,525	0.01	0.01	0.12	0.12
STM17	Fly Ash to Weigh Batcher (bin vent)[1]	96,525	0.01	0.01	0.12	0.12
STM18	Transit Truck Loading Station (BH)[1]	117,000	0.0087	0.0087	0.19	0.56
STM18a	Belt 6 to Transit Truck	117,000	0.0011	0.0074	0.06	0.43

[1]"BH" and "bin vent" denote units vented to baghouses and bin vents. Emissions from baghouse and bin vent points are computed based on 75% capture efficiency and 99.5% control efficiency.

15. The permittee shall not allow the actual emissions from each emission unit/activity to exceed the PTE in Table III-B-25 in any consecutive 12-month period. *[NSR—ATC, Section IV-A, Condition 30 (10/18/12)]*

Table III-B-25: Cal Portland Plant 3 Emissions

EU	Description	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
STM44	Radial Stacker	474,000	0.000013	0.000046	0.01	0.01
STM43	Drive over Hopper	474,000	0.000013	0.000046	0.01	0.01
STM45	Hopper to Agg. Belt 1	94,800	0.000013	0.000046	0.01	0.01
STM46	Hopper to Agg. Belt 2	94,800	0.000013	0.000046	0.01	0.01
STM47	Hopper to Agg. Belt 3	94,800	0.000013	0.000046	0.01	0.01
STM48	Hopper to Agg. Belt 4	94,800	0.000013	0.000046	0.01	0.01
STM49	Hopper to Agg. Belt 5	94,800	0.000013	0.000046	0.01	0.01
STM55	Agg. Bin (5 compartment)	474,000	0.000013	0.000046	0.01	0.01
STM50	Belt 6 to Agg. Bin	94,800	0.000013	0.000046	0.01	0.01
STM51	Belt 7 to Agg. Bin	94,800	0.000013	0.000046	0.01	0.01
STM52	Belt 8 to Agg. Bin	94,800	0.000013	0.000046	0.01	0.01

EU	Description	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
STM53	Belt 9 to Agg. Bin	94,800	0.000013	0.000046	0.01	0.01
STM54	Belt 10 to Agg. Bin	94,800	0.000013	0.000046	0.01	0.01
STM56	Bin to Weigh Hopper	474,000	Enclosed	Enclosed	0.00	0.00
STM57	Belt A13 to Truck Loadout	474,000	0.000051	0.00034	0.01	0.08
STM58	Cement Silo #1 Loading	20,000	0.000051	0.00034	0.01	0.01
STM59	Cement Silo #2 Loading	20,000	0.000051	0.00034	0.01	0.01
STM60	Fly Ash Silo Loading	30,000	0.000735	0.0049	0.01	0.07
STM61	Silos to Weigh Batcher	90,000	0.000360	0.0024	0.02	0.11
STM62	Truck Loading (BH)[1]	90,000	0.0087	0.0087	0.10	0.10
STM63	Guppy Silo (bin vent)[1]	60,000	0.0034	0.00034	0.03	0.01
STM64	Ash Guppy Silo (bin vent)[1]	30,000	0.0049	0.0049	0.02	0.02
STM65	Cement Silo (bin vent)[1]	20,000	0.0034	0.00034	0.01	0.01

[1]"BH" and "bin vent" denote units vented to baghouses and bin vents. Emissions from baghouse and bin vent points are computed based on 75% capture efficiency and 99.5% control efficiency.

16. The permittee shall not allow the actual emissions from the media blasting activity to exceed the PTE in Table III-B-26 in any consecutive 12-month period. *[NSR—ATC, Section IV-A, Condition 33 (10/18/12)]*

Table III-B-26: Media Blasting PTE [1] (tons/year)

EU	Description	Conditions	$PM_{2.5}$	PM_{10}
MB01	Media Blasting Operations, 48"x28"x28" [2]	1,000 hrs/year	0.25	0.25

[1]Based on a sand mass flow rate of 721.7 lbs/hr and controlled $PM_{2.5}$ / PM_{10} EF = 0.69 lb/1,000 lb abrasive.
[2]Enclosure vented to a dust collector.

17. The permittee shall not allow the actual emissions from the gasoline dispensing activities to exceed the PTE in Table III-B-27 in any consecutive 12-month period. *[NSR—ATC, Section IV-A, Condition 34 (10/18/12)]*

Table III-B-27: Gasoline Dispensing VOC PTE (tons per year)

EU	Description	Throughput	VOC PTE
FT01	500-gallon aboveground gasoline storage tank	12,000 gal/year	0.52
FT02	500-gallon aboveground gasoline storage tank		

18. The permittee shall not allow the actual emissions from the portable crushing plant to exceed the PTE in Tables III-B-28 and III-B-29 in any consecutive 12-month period. *[Minor Revision Application (8/22/2019)]*

Table III-B-28: Portable Crushing Plant Emissions

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
PC00	VGF	350,000	0.000013	0.0011	0.01	0.19
PC01	Jaw Crusher	350,000	0.0001	0.0024	0.02	0.42
	Conveyor	350,000	0.000013	0.0011	0.01	0.19

EU	Transfer Points	Tons/Year	$PM_{2.5}$ EF (lbs/ton)	PM_{10} EF (lbs/ton)	$PM_{2.5}$ (tons/yr)	PM_{10} (tons/yr)
PC02	3-Deck Screen and Conveyors	350,000	0.00005	0.0087	0.01	1.52
PC03	Cone Crusher and Conveyors	350,000	0.0001	0.0024	0.02	0.42
PC04	Recycle Conveyor	350,000	0.000013	0.0011	0.01	0.19
PC05	Conveyor	175,000	0.000013	0.0011	0.01	0.10
	Stacker	175,000	0.000013	0.0011	0.01	0.10
PC06	Conveyor	175,000	0.000013	0.0011	0.01	0.10
	Conveyor	175,000	0.000013	0.0011	0.01	0.10
	Stacker	175,000	0.000013	0.0011	0.01	0.10
PC07	Truck load/Unload	350,000	0.000085	0.0001	0.02	0.02
PC08	Haul Road (unpaved)	1,556 VMT/yr	1.14 lb/VMT	7.57 lb/VMT	0.09	0.59

Table III-B-29: Portable Crushing Plant Engine Emissions (EU: PC09)

EU	Rating	Conditions	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAP
PC09	605 hp	1,250 hours/year	0.07	0.07	4.27	0.42	0.01	0.17	0.01

19. Unless specified otherwise below, the permittee shall not discharge into the atmosphere from any emission unit, exclusive of blasting activities, any air contaminant in excess of an average of 20% opacity for more than 6 consecutive minutes. *[AQR 26.1]*

20. The permittee shall not allow fugitive emissions from the fly ash and cement silo loading (EUs: F015, F017, F017a, F028, STM13, STM13a, STM15, STM58, STM59, STM60, STM63, STM64, STM65, AE07, & AE09) in excess of an average opacity of 20% for a period of more than six consecutive minutes. *[AQR 26.1]*

21. The permittee shall not allow visible emissions from the asphalt plant in excess of an average of 20% opacity (EUs: D001–D027). *[40 CFR Part 60.92(a)(2) and 40 CFR Part 60.11]*

22. The permittee shall not discharge from the asphalt plant (EUs: D001–D027) into the atmosphere any gases that contain particulate matter in excess of 0.04 grains per dry standard cubic foot (g/dscf). *[40 CFR Part 60.92(a)(1)]*

23. The permittee shall operate wet processes (>10% moisture in the ¼" minus materials) (EUs: A084–A76, A103a–A111d, & A055–A078) in such a manner that no visible emissions are observed at any time. *[AQR 12.5.2.3]*

24. The permittee shall not allow fugitive emissions from screens, conveyors, and transfer points that commenced construction, modification, or reconstruction after August 31, 1983, but before April 22, 2008, to exhibit an average opacity greater than 10% based on five, 6-minute averages. This is applicable to the emission units listed in Table III-B-30. *[40 CFR Part 60.672(b), 40 CFR Part 60.675 (c)(3) and 40 CFR Part 60.11]*

Table III-B-30: 40 CFR Part 60, Subpart OOO—10% Opacity Applicable EUs (Pre-April 22, 2008)

EU	Description
Secondary Aggregate Plant	
A013	Tunnel Belt BC-4a 3 to VGF 2a
A016	VGF 2a drop to Belt 4 (BH)
A018	Screen S-1 (Simplicity) (BH)
A017	Belt 4 to Screen S-1 (BH)
A020	Screen S-1 to Crusher CR-2 (BH)
A036	Screen S-1 underbelt to Belt 5
A022	Belt 6 Split to Belt 44 and 45
A023	Belt 44 to Screen S-2a (BH)
A027	Screen S-2a to Belt 46 (BH)
A034	Screen S-2a underbelt to Belt 7
A024	Belt 45 to Screen S-3a (BH)
A028	Screen S-3a to Belt 47 (BH)
A035	Screen S-3a underbelt to Belt 7
A029	Belt 46 to Belt 8 (BH)
A030	Belt 47 to Belt 8 (BH)
A032	Crusher CR-3 (BH)
A033	Crusher CR-3 to Belt 6 (BH)
A037	Belt 5 to Belt 43
A038	Belt 43 to Belt 7 or 62
A038a	Belt 62 to Belt 63
A039	Belt 7 to Stacker 9
Overland Feed System	
A041	Belt Feeds 1-3 to Tunnel Belt 10
A042	Belt 10 to Overland Belt 48 (BH)
A043	Overland Belt 48 to Belts 11 and 50 (BH)
A046	Belt 50 to Stacker 51
Wash Plant #1	
A080	VGF 3a through 4 to Belt 25
A081	Belt 25 Tunnel to Belt 74
A107a	Belt 39 to Belt 74
A083	Belt 74 (mod) to Belts 54, 55, and 30 via Surge Bin
A111	Belt 72 to Belt 74
Wash Plant #2	
A048	VGF 1 and 2 to Belt 12
A049	Belt 12 Tunnel to Splitter Bin (Belt 20 & 22)
A050	Belt 13 (spare)
A051	Belt 22 to Belt 17
A053	Belt 20 to Belt 21
A059	Crusher CR-5 (Canica VSI)

EU	Description
A061	Belt 19 to Splitter BC22 & BC20
West Screen Plant	
B001	Stockpile to Belt 1
B002	Belt 1 to Belt 3
B004	Belt 3 to Splitter (BH)
B004a	Splitter to Belt 4 (BH)
B006a	Splitter to Belt 5 (BH)
B006	Screen 1 ElJay (BH)
B005	Belt 4 to Screen 1
B022	Screen 1 to Belt 18
B008	Screen 2 ElJay (BH)
B007	Belt 5 to Screen 2
B024	Screen 2 to Belt 19
B013	Screen 3 (JCI) (BH)
B012	Belt 7 to Screen 3
B013a	Screens 1-3 to Belt 10
B13b	Screens 1-3 to Belt 20
B018	Screens 1-3 to Belt 17
B039	Screen 3 to Belt 8
B033	Belt 20 (crossbelt) to 6x20 Screen 6
B037	Belt 12 to Belt 9
B041	Belt 9 to Splitter Box
B035	Cone Crusher (BH)
B020	Belt 15 Recirc to Splitter
B051	Belt 17 to 6x20 Screen 4 (Wet Deck)
B038	Belt 18 to Belt 13
B026	Belt 19 to Belt 13
B040	Belt 8 to Belt 13
B053b	Belt 13 to Belt 13a
B031	Stacker 1 to Stockpile (CF)
B003a	Reject Stacker (alt ops)
B011	Belt 6 to Stacker 8 (T2)
Type 2 Plant (Virgin and Recycle)	
A012d	VGF2 to Belt 70
A012e	Belt 70 to Belt 2a Overland
A010a	Loader to VGF Feeder
C003	VGF to Belt 3
C004	Belt 3 to Belt 4
C005a	Screen 3 Cedar Rapids
C005b	Belt 4 to Screen 3
C005c	Screen 3 to Stacker 22 (alt)
C005d	Screen 3 to Stacker 15 (alt)
C005e	Screen 3 to Underbelt
C005f	Screen 3 to Belt 5

EU	Description
C031	S3 Underbelt to Stacker
C006	Belt 5 to Belt 6 & 7 (splitter)
C008	Screen 1 Cedar Rapids
C007	Belt 6 to Screen 1
C016	Screen 1 to Belt 14
C009	Screen 2 Cedar Rapids
C009a	Screen1 & 2 to Belt 8
C025	Screen 2 to Belt 21
C013	Belt 11 to Belt 12
C013a	Belt 12 to Belt 6&7 (splitter)
C017	Belt 14 to Belt 18a
C022	Belt 18a to Stacker 17
C027	Belt 20 to Belt 16
C019	Belt 16 to Stacker
C011	Belt 9 Spare
C035	Belt 19 Spare
Portable Crushing Plant	
PC02	3-Deck Screen and Conveyors
PC03	Cone Crusher and Conveyors
PC04	Recycle Conveyor
PC05	Conveyor and Stacker
PC06	Conveyors and stacker

25. The permittee shall not allow fugitive emissions from crushers that commenced construction, modification, or reconstruction after August 31, 1983, but before April 22, 2008, to exhibit an average opacity greater than 15% based on five 6-minute averages. This applies to the units listed in Table III-B-31. *[40 CFR Part 60.672(b), 40 CFR Part 60.675 (c)(3) and 40 CFR Part 60.11]*

Table III-B-31: 40 CFR Part 60, Subpart OOO—Applicable EUs Pre-April 22, 2008 (15% Opacity)

EU	Description
Primary Feed (Mountain Top)	
A02	Gyratory Crusher (crushing) and associated transfers
Secondary Aggregate Plant	
A020	Crusher CR-2 (Hazemag) (BH) and associated transfers
A032	Crusher CR-3 (Canica VSI) (BH) and associated transfers
Wash Plant #2	
A059	Crusher CR-5 (Canica VSI) and associated transfers
West Screen Plant	
B035	Cone Crusher (BH) and associated transfers
Type 2 Plant (Virgin and Recycle)	
A012b	Jaw Crusher CR-10 and associated transfers

EU	Description
C002	Jaw Crusher and associated transfers
C012	Horz. Shaft Impact Crusher and associated transfers
Portable Crushing Plant	
PC01	Jaw Crusher and Conveyor

26. The permittee shall not allow fugitive emissions from screens, conveyors, and transfer points that commenced construction modification, or reconstruction after April 22, 2008, not connected to baghouses, to exhibit an average opacity greater than 7% based on five 6-minute averages. This applies to the units listed in Table III-B-32. *[40 CFR Part 60.672(b), 40 CFR Part 60.675 (c)(3) and 40 CFR Part 60.11]*

Table III-B-32: 40 CFR Part 60, Subpart OOO—Applicable EUs Post-April 22, 2008 (7% Opacity)

EU	Description
Secondary Aggregate Plant	
A025a	Screen S-2a (Cedar Rapids 8x20) (BH)
A026a	Screen S-3a (Cedar Rapids 8x20) (BH)
A038c	Belt 64 at H.S.I. oversize reject (alt ops)
Wash Plant #2 and ¼" Crushing and Screening	
A120d	Belt 72 to Belt 81
A120e	Belt 73 to VSI Crushers CR-9 and CR-9a (splitter)
A120a	6x20 3 Deck Wet Screen S-12
A120f	3 Deck Size Screen transfers to BC-81 and recirc.
A121A	Belt 77 to 6x20 3 Deck Screen
A125	3 Deck Screen 5x16
A120g	Belt 80 (spare)
A122a	X-Belt to Stacker 78
A122b	Belt 74 (spare)
A122c	Belt 81 to Screen 5x16
A122d	Belt 82 (spare)
A124	Belt (spare)
Rip Rap/Miscellaneous Screening	
H08	Trommel Screen Hurcules HT182
H02	Oversize Reject #1 - #4
H05	Fines Transfer Belt
West Screen Plant	
B016	Belt 16 (spare)
B054	Belt 13a to Stacker 1
B047	7 x 20 Dewater Screen to Stacker 2 (CF)
B046a	Loader to Aux Refeed Hopper w/Feeder (alt)
Type 2 Plant (Virgin and Recycle)	
A010	Belt 2a to VGF Feeder or SP
C009	Screen 2 Cedar Rapids

EU	Description
C008a	Belt 7 to Screen 2
C026	Belt 21 to Belt 20
Road Runner Portable Screen	
RS01	Loader to Hopper
RS03	Road Runner Incline Screen
RS02	Conveyor to Screen
RS04	Screen to Stacker 1
RS06	Screen to Stacker 2
RS08	Underbelt Transfer to Stacker 3
Blending System	
BS02	Belt Feeders to Belt
BS03	Splitter to Alt Stacker (pugmill bypass)
D013d	Pugmill Mixer (mixes supplement, water, and aggregate)
BS05a	Belt to Pugmill
D013e	Belt Conveyor to Stacker

27. The permittee shall not allow visible emissions from crushers that commenced construction, modification, or reconstruction after April 22, 2008, and that are not connected to baghouses, to exhibit an average opacity greater than 12% based on five 6-minute averages. This applies to the units listed in Table III-B-33. *[40 CFR Part 60.672(b), 40 CFR Part 60.675 (c)(3) and 40 CFR Part 60.11]*

Table III-B-33: 40 CFR Part 60, Subpart OOO—Applicable EUs Post-April 22, 2008 (12% Opacity)

EU	Description
Wash Plant #1	
A103	VSI CR-7a and associated transfers
A106	VSI Crusher CR-6a and associated transfers
Wash Plant #2	
A120h	Canica VSI Crusher CR-9a and associated transfers
A120	Canica VSI Crusher CR-9 and associated transfers

28. The permittee shall not allow visible emissions from baghouses at the crushing and screening plants to exhibit an average opacity greater than 7% based on five 6-minute averages (EUs: A015, A016, A018, A017, A019, A020, A021, A025a, A023, A027, A026a, A024, A028, A029, A030, A032, A031, A033, A040, A042, A043, B004, B004a, B006a, B006, B008, B013, & B035). *[40 CFR Part 60.672(b), 40 CFR Part 60.675 (c)(3) and 40 CFR Part 60.11]*

29. The permittee shall not discharge into the atmosphere emissions from any stack subject to Subpart OOO of 40 CFR Part 60 that contain particulate matter in excess of 0.05 g/dscm (EUs: A015, A016, A018, A017, A019, A020, A021, A025a, A023, A027, A026a, A024, A028, A029, A030, A032, A031, A033, A040, A042, A043, B004, B004a, B006a, B006, B008, B013, B035, D009, D014, F014a, & F031). *[40 CFR Part 60.672(a)]*

30. The permittee shall not cause, suffer, or allow the source to discharge air contaminants (or other material) in quantities that will cause a nuisance, including excessive odors. *[AQR 40 & AQR 43]*

31. The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner that allows or may allow controllable particulate matter to become airborne. *[AQR 41.1.2]*

Fugitive Dust

32. The permittee shall not cause or allow fugitive dust from trackout, which includes accumulation of mud or dirt on curbs, gutters, sidewalks, or paved surfaces, or from the handling, transport, or storage of any material in a manner that allows visible emissions of particulate matter to: *[AQR 94.14(a) & AQR 94.14(e)]*

    a. Exceed 20% opacity using the Time Averaged Method (AQR 94.15.2) or the Intermittent Emissions Method (AQR 94.15.3);

    b. Exceed 50% opacity using the Instantaneous Method (AQR 94.15.4);

    c. Extend more than 100 feet; or

    d. Cross a property line.

33. The permittee shall not allow fugitive dust emissions from unpaved parking lots or storage areas of more than 5,000 square feet to exceed: *[AQR 92.4(a)]*

    a. 20% opacity based on the Opacity Test Method (AQR 92.6.1); or

    b. 50% opacity based on the Instantaneous Method (AQR 92.6.2).

34. The permittee shall not allow a fugitive dust plume from an unpaved parking lot or storage area of more than 5,000 square feet to cross a property line. *[AQR 92.4(b)]*

C. OPERATIONAL LIMITS

Aggregate/Asphalt Processing

1. The permittee shall limit the amount of material mined and processed through the primary feed (EU: A02a) at this source to 5,000,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC/OP Modification 3, Section III-A, Condition 3 (11/09/05)]*

2. The permittee shall limit the amount of material processed at the secondary plant (EU: A040) to 5,000,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC/OP Modification 3, Section III-A, Condition 3 (11/09/05)]*

3. The permittee shall limit the blasting area (EU: A001a) to 35,000 square feet per blast. *[NSR—ATC/OP Modification 6, Section III-A, Table III-A-12 (06/25/08)]*

4. The permittee shall limit the number of blasts to 175 blasts per any consecutive 12-month period, monitored and calculated at the end of each month (EU: A001a). *[NSR—ATC/OP Modification 6, Section III-A, Table III-A-12 (06/25/08)]*

5. The permittee shall limit the amount of blasting agent (EU: A001a) used to 1,500 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC/OP Modification 6, Section III-A, Table III-A-13 (06/25/08)]*

6. The permittee shall limit the number of holes drilled for blasting (EU: A001b) to 7,500 in any consecutive 12-month period, monitored and calculated at the end of each month. *[Title V Application (06/19/2018) incorporated into the Title V OP]*

7. The permittee shall limit the throughput of Wash Plant 1 (EU: A080) to 2,000,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC/OP Modification 3, Section III-A, Condition 5 (11/09/05)]*

8. The permittee shall limit the throughput of Wash Plant 2 (EU: A048) to 1,500,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC/OP Modification 10, Section IV-B, Condition 5 (04/30/10)]*

9. The permittee shall limit the throughput of the Trommel Screen System (EU: H05c) to 150,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC Section IV-B, Condition 3 (01/27/11)]*

10. The permittee shall limit the throughput of the Grizzly Screen (EU: H02a) to 75,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC Section IV-A, Condition 10 (10/17/12)]*

11. The permittee shall limit the throughput of the West Screen Plant (EU: B001) to 1,500,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC/OP Modification 5, Section III-A, Condition 6 (11/05/07)]*

12. The permittee shall limit the throughput of material mined and processed through the Type II Plant (Virgin and Recycle) (EU: C001) to 700,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC/OP Modification 4, Section III-A, Conditions 7&8 (12/11/06)]*

13. The permittee shall limit the amount of material mined for the Type II Plant (EU: C001a) to 500,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC/OP Modification 4, Section III-A, Condition 7 (12/11/06)]*

14. The permittee shall limit the throughput in the Asphalt Plant (EU: D014) to 660,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC/OP Modification 4, Section III-A, Condition 9 (12/11/06)]*

15. The permittee shall limit the combined amount of diesel fuel used in the hot oil heaters (EUs: D026 & D027) to 131,400 gallons per any consecutive 12-month period. *[Title V Application (dated 09/01/2015) incorporated into the Title V OP]*

16. The permittee shall limit the combined amount of propane fuel used in the hot oil heaters (EUs: D026 & D027) to 147,294 gallons per any consecutive 12-month period. *[Title V Application (dated 09/01/2015) incorporated into the Title V OP]*

17. The permittee shall limit the throughput in the Road Runner Portable Screen Plant (EU: RS01) to 50,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC Modification 9, Section IV-B, Condition 2 (05/11/09)]*

18. The permittee shall limit the throughput in the Blending System (EU: BS01) to 500,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[NSR—ATC Section IV-B, Condition 4 (01/27/11)]*

19. The permittee shall limit the throughput in the New Blending System (EU: BS15) to 400,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[Title V Application (dated 02/27/2014) incorporated into the Title V OP]*

20. The permittee shall limit the throughput in the Coyote Portable Plant (EU: CY01) to 15,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[Title V Application 08/08/2017 incorporated into the Title V OP]*

21. The permittee shall limit the vehicle miles traveled (VMT) associated with all plants and processes to 232,671 in any consecutive 12-month period (EU: H06). *[Title V Application (dated 04/15/2016) Incorporated into the Title V OP]*

22. The permittee shall limit the sum of all stockpile areas at any given time to 51.0 acres (EU: G01). *[NSR—ATC/OP Modification 6, Section III-A, Table III-A-20 (06/25/08)]*

Silver Star Ready Mix Plant

23. The permittee shall limit the throughput in the Silver Star Ready Mix Plant (EU: F001) to 185,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[Title V Application ((dated 04/15/2016) Incorporated into the Title V OP]*

24. The permittee shall limit the operation of the Fire Storm water heater to 1,200 hours in any consecutive 12-month period (EU: F023). *[Title V Application ((dated 04/15/2016) Incorporated into the Title V OP]*

Con-E-Co Concrete Batch Plant

25. The permittee shall limit the amount of concrete processed through the Con-E-Co Concrete Batch Plant to 50,000 cubic yards in any consecutive 12-month period, monitored and calculated at the end of each month. Washed aggregate and rock usage (EU: F025) shall be limited to 80,850 tons in any consecutive 12-month period. *[NSR—ATC Section IV-B, Condition 1 (03/08/11)]*

Western Pacific Precast Plant

26. The permittee shall limit the throughput in the Western Pacific Precast Plant (EU: AE01) to 266,809 tons in any consecutive 12-month period, monitored and calculated at the end of each month. *[Title V Application (06/19/2018) Incorporated into the Title V OP]*

CalPortland Plant 1

27. The permittee shall limit the throughput of material processed at CalPortland Plant One to 642,135 tons in any consecutive 12-month period, monitored and calculated at the end of each month (EU: STM01). *[Title V Application 05/25/2017 incorporated into the Title V OP]*

CalPortland Plant 3

28. The permittee shall limit the production of concrete products to 474,000 tons in any consecutive 12-month period, monitored and calculated at the end of each month (EU: STM44). *[Title V Application 05/25/2017 incorporated into the Title V OP]*

Overland Feed System

29. The permittee shall shut down the stackers in the Overland Feed System (EUs: A045 and A046a) during the duration of a Construction Notice or Dust advisory. *[HOO December 14, 2019]*

Diesel-Powered Units

30. The permittee shall limit the operation of engine (EU: A123) to 2,000 hours in any consecutive 12-month period. *[NSR—ATC, Condition IV-B-25 (10/17/12)]*

31. The permittee shall limit the operation of engine (EU: RS10) to 500 hours in any consecutive 12-month period. *[NSR—ATC Mod 9, Condition IV-B-4 (05/11/09)]*

32. The permittee shall limit the operation of engine (EU: A123b) to 1,250 hours in any consecutive 12-month period. *[Title V Renewal Application (05/25/2017)]*

33. The permittee shall limit the operation of engine (EU: A123c) to 1,250 hours in any consecutive 12-month period. *[Title V Renewal Application (05/25/2017)]*

34. The permittee shall limit the operation of engine (EU: CY09) to 2,500 hours in any consecutive 12-month period. *[Title V Application (08/24/2017) incorporated into the Title V OP]*

Media Blasting Unit

35. The permittee shall limit the operation of the media blasting unit (EU: MB01) to 1,000 hours in any consecutive 12-month period. *[Minor Title V Revision (dated 05/26/2011) incorporated into the Initial Title V OP]*

Gasoline Dispensing/Storage

36. The permittee shall limit the combined throughput of gasoline for the fuel tanks (EUs: FT01 & FT02) to 12,000 gallons in any consecutive 12-month period. *[Minor Title V Revision (dated 08/25/2011) incorporated into the Title V OP]*

Portable Crushing Plant

37. The permittee shall limit the throughput of the portable crushing plant (EUs: PC00 through PC08) to 350,000 tons in any consecutive 12-month period. *[Minor Revision Application, August 22, 2019]*

38. The permittee shall limit the hours of operation of the engine at the portable crushing plant (EU: PC09) to 1,250 hours in any consecutive 12-month period. *[Minor Revision Application, August 22, 2019]*

D. EMISSION CONTROLS

Aggregate, Concrete, and Asphalt Processing

1. Wherever a baghouse is used to control emissions from process equipment, the permittee shall ensure that baghouse is in use at all times the process equipment is operating. (For clarification, Table III-D-1 identifies applicable baghouse control devices.) *[NSR—ATC/OP Modification 4, Section III-B, Condition 1 (12/11/06)]*

Table III-D-1: List of Emission Units with Baghouse Control

EU	EUs and Transfer Points Controlled by Baghouse	Baghouse ID
A016	VGF drop to Belt 4	DC1
A018	Belt 4 to Screen S-1, Screen S-1 (Simplicity)	
A020	Screen to Crusher CR-2, Crusher CR-2 (Hazemag), Crusher CR-2 to Belt 6	
A025a	Belt 45 to Screen S-2a, Screen S-2a (Cedar Rapids 8x20), Screen S-2a to Belt 46	
A026a	Belt 45 to Screen S-3a, Screen S-3a (Cedar Rapids 8x20), Screen S-3a to Belt 47	
A029	Belt 46 to Belt 8, Belt 47 to Belt 8	
A032	Belt 8 to Crusher CR-3, Crusher CR-3 (Canica VSI), Crusher CR-3 to Belt 6	
A040	Stacker 9 to Surge pile 2	
A042	Belt 10 to Overland Belt 48	DC3
A043	Overland Belt 48 to Belts 11 and 50	DC4
B004	Belt 3 to Splitter Box	DC2
B004a	Splitter to Belt 4	
B006a	Splitter to Belt 5	
B006	Screen 1 (ElJay)	
B008	Screen 2 (ElJay)	
B013	Screen 3 (JCI)	
B035	Cone Crusher (Sanvick)	
D009	Screen to Conveyor 8	Aztec 200-hp (twin) Pulsejet
D014	Aztec Drum Mixer	Aztec 200-hp (twin) Pulsejet
F014a	Loading Station Central Mix	C&W Baghouse 10 hp
F019	Batcher 18 to Truck	
F031	Transit Truck Loading	WAMFLO
AE11	Transit Truck Loading	
STM18	Transit Truck Loading Station	STM18
STM62	Transit Truck Loading Station	STM62

DC1 – Fabric Filter Air Systems 200-hp Pulsejet SN5316
DC2 – Fabric Filter Systems 125-hp Pulsejet SN 5315

2. The permittee shall ensure that an effective seal is installed around the baghouses installed on emissions units, as indicated in Table III-D-1, and the pressure drop across each baghouse cell shall be maintained as follows: *[NSR—ATC/OP Modification 4, Section III-B, Condition 41 (12/11/06)]*

   a. Between 1" and 8" water column for the baghouse on EU: F014a; and

b. Between 1" and 6" water column for all other baghouses.

3. The permittee shall operate fly ash silo loading, cement silo loading, and weigh batcher loading associated with the concrete batch plants with bin vent dust filters that have a manufacturer's minimum control efficiency of 99.5% (EUs: F015, F016, F017, F017a, F019, F027b, F028, F029, F30, AE05, AE07, AE08, AE09, STM08a, STM13, STM14, STM15, STM16, STM56, STM58, STM60, STM61, STM63, STM64, & STM65). *[NSR—ATC 372 Condition IV-C-10 (01/27/11)]*

4. The permittee shall utilize an automated air-to-fuel ratio control system that optimizes burner performance in the asphalt plant drum mixer. The system shall be maintained and calibrated according to the specifications of the manufacturer, and the control system shall be employed at all times when the drum mixer is operated (EU: D014). *[NSR—ATC/OP Modification 4, Section III-B, Condition 28 (12/11/06)]*

5. The permittee shall maintain a water spray system in good operating condition, as verified by daily inspection, and use it during the processing of material as needed to mitigate fugitive emissions. This shall include, but not be limited to, crushing, screening, transfer points, drop points, and stacker points, but shall exclude washed product processing. The permittee shall investigate and correct any problems with the control equipment before resuming operations. The Control Officer at any time may require additional water sprays at pertinent locations if an inspection by the Control Officer indicates that the opacity limit is being exceeded. *[NSR—ATC/OP Modification 6, Section IV-B, Condition 46 (06/25/08), Part 70 OP Minor Revision (8/22/2019)]*

6. The permittee shall install and operate a dust abatement injection system on the secondary stacker (EU: A043), that will inject a mixture of Earthbind 100, or a product with similar specifications set forth in Exhibit 1 of the HOO, and water to the material product stream at all times the secondary stacker operates. *[HOO November 14, 2019]*

7. The permittee shall operate and maintain the dust abatement injection system with Earthbind 100 or similar product, in good working order in accordance with the manufacturer's specifications (manufacturer's O&M manual), at all times the secondary stacker (EU: A043) is in operation. *[HOO November 14, 2019]*

Fugitive Emissions

8. The permittee shall take continual measures to control fugitive dust (e.g., wet, chemical, or organic suppression, enclosures, etc.) at all mining and aggregate processing operations, material transfer points, stockpiles, truck loading stations, and haul roads throughout the source. The Control Officer may at any time require additional water sprays or other controls at pertinent locations if a DAQ inspection indicates that opacity limits are being exceeded. *[NSR—ATC/OP Modification 4, Section III-B, Condition 19 (12/11/06), Part 70 OP Minor Revision (8/22/2019)]*

9. The permittee shall sweep and/or rinse paved roads accessing or located on the site as necessary to remove all observable deposits so as to not exceed the opacity limit established by this permit. *[NSR—ATC/OP Modification 4, Section III-B, Condition 35 (12/11/06)]*

10. The permittee shall control fugitive emissions on unpaved roads accessing or located on the site by treating with chemical or organic dust suppressant(s); watering, paving, or graveling them; or using an alternative, Control Officer-approved control measure so as to not exceed the opacity limit established by this permit. *[NSR—ATC/OP Modification 4, Section III-B, Condition 36 (12/11/06), Part 70 OP Minor Revision (8/22/2019), Part 70 OP Minor Revision (8/22/2019)]*

11. The permittee shall control fugitive dust emissions from screens, crushers, conveyors, storage piles, transfer points, and nonmetallic mineral processing equipment not connected to baghouse controls or part of the wet process by operational water sprays to prevent exceeding opacity standards. *[NSR—ATC/OP Modification 4, Section III-B, Condition 23 (12/11/06), Part 70 OP Minor Revision (8/22/2019)]*

12. The permittee shall not cause or allow fugitive dust to become airborne without taking reasonable precautions. *[NSR—ATC/OP Modification 5, Section IV-B, Condition 20 (11/05/07), Part 70 OP Minor Revision (8/22/2019)]*

13. The permittee shall not cause or allow the discharge of fugitive dust in excess of 100 yards from the point of origin or beyond the lot line of the property on which the emissions originate, whichever is less. *[NSR—ATC/OP Modification 4, Section III-B, Condition 20 (12/11/06)]*

14. The permittee shall control fugitive dust emissions from any disturbed open area or disturbed vacant lot owned or operated by the permittee by paving, applying gravel, applying a dust palliative, or applying water to form a crust. *[NSR—ATC/OP Modification 5, Section IV-B, Condition 51 (11/05/07)]*

15. The permittee shall control particulate matter emissions from any unpaved parking lot owned or operated by the permittee by paving, by applying a dust palliative, or by an alternative method approved by the Control Officer, regardless of the number of days of use.

16. Where a stationary source, or a portion thereof, is to be closed or idled for 30 days or more, long-term stabilization of disturbed areas shall be implemented within 10 days following the cessation of active operations. Long-term stabilization includes, but is not limited to, one or more of the following: applying water to form a crust, applying palliatives, applying gravel, paving, denying unauthorized access, or any other effective control measure(s) to prevent fugitive dust from becoming airborne. *[NSR—ATC/OP Modification 4, Section III-B, Condition 44 (12/11/06)]*

Fugitive Dust

17. The permittee shall not allow mud or dirt to accumulate on a paved surface where trackout extends greater than 50 feet in cumulative length or accumulates to a depth greater than 0.25 inches. *[AQR 94.14(d)]*

18. The permittee shall immediately clean any trackout, including trackout less than 50 feet in length or 0.25 inches in depth, and maintain the surface to eliminate emissions of fugitive dust by removing all accumulations of mud or dirt on curbs, gutters, sidewalks, or paved surfaces that cause visible emissions in excess of the emission limits and standards in this permit. *[AQR 94.14(e)]*

19. Except as otherwise required in this section, all trackout shall be cleaned up by the end of the workday or evening shift, regardless of length or depth. *[AQR 94.14(f)]*

20. The permittee shall not use blower devices or dry rotary brushes to remove deposited mud, dirt, or rock from a paved surface. Rotary brushes may be used when sufficient water is applied to limit visible emissions consistent with the emissions limits in this permit. *[AQR 94.14(a)(1)-(3), (b) and (c)]*

21. For stockpiles over eight feet high, the permittee shall: *[AQR 94.14(g)]*

    a. Locate the stockpile more than 100 yards from occupied buildings unless approved in advance by the Control Officer.

    b. Blade a road to the top of the stockpile to allow water truck access, or use another means to provide equally effective dust control at the top of the stockpile.

22. The permittee shall implement one or more of the following to maintain fugitive dust control on all disturbed soils to the extent necessary to pass the Drop Ball Test described in AQR 94.15.5: *[AQR 94.12(b)]*

    a. Maintain in a sufficiently damp condition to prevent loose particles of soil from becoming dislodged;

    b. Crust over by application of water;

    c. Completely cover with clean gravel;

    d. Treat with a dust suppressant; or

    e. Treat using another method approved in advance by the Control Officer.

23. The permittee shall not allow unpaved parking lots or storage areas of more than 5,000 square feet to exceed the following, as determined by Section 92.6.3, except in areas on which clean gravel has been applied. The permittee shall demonstrate compliance as required by the Control Officer. *[AQR 92.4(a)]*

    a. 0.33 oz/ft^2 silt loading; or

    b. 6% silt content.

24. The permittee shall control fugitive dust emissions from unpaved parking lots and storage areas of more than 5,000 feet by: *[AQR 92.3.4]*

    a. Paving, as defined in AQR 0;

    b. Applying alternate asphalt paving, as defined in AQR 92.2;

    c. Uniformly applying and maintaining clean gravel to a depth of two inches; or

    d. Applying and maintaining an alternative control measure with prior written approval from the Control Officer.

25. Control measures outlined in this permit, and other measures needed for maintaining dust control, shall be implemented 24 hours a day, 7 days a week. *[AQR 94.13(b)]*

Drilling and Blasting (EUs: A001a and A001b)

26. Blasting shall not occur when wind gusts of 25 mph or more are forecast, or when DAQ has issued a construction or dust advisory. *[Part 70 OP Minor Revision (8/22/2019)]*

27. The permittee shall plan for blasting by considering weather conditions, as provided by the National Weather Service, and any DAQ-issued construction or dust advisories. *[Part 70 OP Minor Revision (8/22/2019)]*

28. Blasting shall be planned to facilitate a continuous process, in consideration of wind forecasts and any DAQ-issued construction or dust advisories, with the blast fired as soon as possible following the completion of loading. *[Part 70 OP Minor Revision (8/22/2019)]*

29. Document current and predicted weather conditions, as provided by the National Weather Service, before setting explosive charges in holes. *[Part 70 OP Minor Revision (8/22/2019)]*

30. The permittee shall have a water truck available and utilized during all drilling and blasting operations to minimize emissions. *[Part 70 OP Minor Revision (8/22/2019)]*

Water Heaters

31. The permittee shall combust only natural gas or propane in the water heater (EU: F023).

32. The permittee shall maintain and operate the water heater (EU: F023) with burners rated for emission rates of 30 ppm of NO_x, corrected to 3% oxygen. *[NSR—ATC/OP Modification 6, Section IV-B, Condition 51 (06/25/08)]*

33. The permittee shall maintain and operate the water heater (EU: F023) with burners rated for emission rates of 100 ppm of CO, corrected to 3% oxygen. *[NSR—ATC/OP Modification 6, Section IV-B, Condition 51 (06/25/08)]*

Diesel Engines

34. The permittee shall combust only diesel fuel in any engine (EUs: A123, A123b, A123c, RS10, CY09, & PC09). *[40 CFR Part 60.4207(a) & 40 CFR Part 63.6604]*

35. The permittee shall operate and maintain each engine in accordance with the manufacturer's specifications (EUs: A123, A123b, A123c, RS10, CY09, & PC09). *[NSR—ATC Section IV-D, Condition 1 (1/31/14) and Title V Application 05/25/2017 incorporated into the Title V OP, Part 70 OP Minor Revision (8/22/2019)]*

36. The permittee shall operate each engine with a turbocharger and aftercooler (EUs: A123, A123c, RS10, & PC09). *[NSR—ATC Section IV-C, Condition 17 (10/18/12), Part 70 OP Minor Revision (8/22/2019)]*

37. The permittee shall control crankcase emissions on the engine (EUs: A123 & A123c) in accordance with one of the following conditions: *[40 CFR Part 63, Subpart ZZZZ]*

    a. A closed crankcase ventilation system that prevents crankcase emissions from being emitted to the atmosphere; or

    b. An open crankcase filtration emission control system that reduces emissions from the crankcase by filtering the exhaust stream to remove oil mist, particulates, and metals.

38. The permittee shall operate the engines with a turbocharger and air cooler (EUs: A123b & CY09). *[NSR—ATC Section IV-D, Condition 1 (1/31/14) and Title V Application (08/24/2017) incorporated into the Title V OP]*

39. The permittee shall maintain the engine (EU: RS10) as follows, unless the manufacturer's specifications are more stringent: *[NSR—ATC Section IV-C, Condition 20 (10/18/12) & 40 CFR Part 63.6625(i)]*

    a. Change oil and filter every 500 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.

Media Blasting Unit

40. The permittee shall control media blasting operations by performing all blasting in an enclosure and venting the enclosure to a dust collector. *[NSR—ATC Section IV-C, Condition 21 (10/18/12)]*

Gasoline Dispensing/Storage

41. The permittee shall implement control technology requirements pursuant to 40 CFR Part 63, Subpart CCCCCC, as follows:

    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: *[NSR—ATC Section IV-C, Condition 22 (10/18/12) & 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; and

        iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.

General Emission Controls

42. The permittee must comply with control requirements contained in this section. If there is inconsistency between standards or requirements, the most stringent standard or requirement shall apply. *[NSR—ATC Section IV-C, Condition 23 (10/18/12)]*

E. MONITORING

Water Heaters

1. The permittee shall conduct burner efficiency tests in accordance with the manufacturer's specifications and specifications for good combustion practices at least once per calendar year (EU: F023). *[NSR—ATC Section IV-D, Condition 1 (10/18/12)]*

2. The permittee shall not be required to perform a burner efficiency test if the actual hours of operation are zero. This requires that an hour meter be installed, and written records must begin to be kept prior to the beginning of the calendar year for which the option is to be exercised. (EU: F023). *[NSR—ATC Section IV-D, Condition 3 (10/18/12)]*

3. The permittee shall operate the water heater with a nonresettable hour meter, or other device approved in advance by the Control Officer, and monitor the hours of operation (EU: F023). *[NSR—ATC Section IV-D, Condition 2 (10/18/12)]*

Diesel Engines

4. The permittee shall operate the engines (EUs: A123, A123b, A123c, RS10, & CY09) with a nonresettable hour meter and monitor the duration of operation. *[Title V Renewal Application (05/25/2017)]*

Aggregate, Concrete, and Asphalt Processing

5. The permittee shall use EPA Test Method 9 to comply with the opacity requirements of 40 CFR Part 60, Subpart I and Subpart OOO. *[40 CFR Parts 60.93, 60.675 and 40 CFR Part 60.11]*

6. The permittee shall use EPA Test Method 5 to comply with the particulate matter standards of 40 CFR 60, Subpart I and Subpart OOO. *[40 CFR Parts 60.93, 60.675 & 40 CFR Part 60.11]*

7. The permittee shall maintain a weigh-belt immediately after the primary crusher (EU: A02) to monitor throughput. This weigh belt shall conform to ASTM International standards and be operated, maintained, and calibrated according to the manufacturer's specifications. *[Title V Application (dated 02/04/2013) incorporated into the Title V OP]*

8. The permittee shall monitor the material throughput of each process that has a production limit identified in Section III-B of this permit. The throughput shall be monitored and recorded at least monthly. *[NSR—ATC Section IV-D, Condition 6 (10/18/12)]*

9. The permittee shall monitor the amount of diesel and propane fuel used in the hot oil heaters (EUs: D026 & D027). *[Title V Application (dated 09/01/2015) incorporated into the Title V OP]*

10. The permittee shall operate a continuous automated particle sampler (Beta Attenuation or EPA-approved equivalent) pursuant to 40 CFR Part 53. The automated particle sampler shall be capable of speciation and located in a site approved by the Control Officer. *[NSR—ATC Modification 10, Section IV-D, Condition 7 (04/30/10)]*

11. 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 (EU: A015, A016, A018, A017, A019, A020, A021, A025a, A023, A027, A026a, A024, A028, A029, A030, A032, A031, A033, A040, A042, A043, B004, B004a, B006a, B006, B008, B013, B035, D009, D014, F014a, & F031). *[NSR—ATC Modification 10, Section IV-D, Condition 8 (04/30/10)]*

12. The permittee shall use truck-mounted pressure gauges to monitor the operation pressure of silo bin vents during each loading activity, to not exceed the loading pressure of 12 psi. *[Title V Application (dated 02/04/2013) incorporated into the Title V OP]*

13. The permittee shall conduct daily visual observations of bin vents, baghouses, and/or stack discharges to verify that visible emissions are not present. If there are visual emissions, the permittee shall cease operations producing the emissions until the problem is corrected. *[NSR—ATC Modification 10, Section IV-D, Condition 9 (04/30/10)]*

14. The permittee shall conduct monthly visual inspections of the baghouse and bin vent interior for air leaks. Defective baghouse compartments shall be sealed off and repairs completed within five working days of the discovery of the malfunction. Should the malfunction cause the baghouse to be ineffective in controlling particulate emissions, the processing of material shall cease until repairs to the baghouse are completed. *[NSR—ATC Modification 10, Section IV-D, Condition 10 (04/30/10)]*

15. The permittee shall conduct a daily visual emissions check for visible emissions from emissions units while they are in operation. *[NSR—ATC Section IV-D, Condition 11 (10/18/12)]*

16. If the permittee, during the visible emissions check, does not see any plume that, on an instantaneous basis, appears to exceed the opacity standard, then the observer shall keep a record of the name of the observer, the date on which the check was made, the location, and the results of the visible emissions check. *[NSR—ATC Section IV-D, Condition 12 (10/18/12)]*

17. If the permittee sees a plume that, on an instantaneous basis, appears to exceed the opacity standard, the permittee shall: *[NSR—ATC Section IV-D, Condition 13 (10/18/12)]*

    a. Take immediate action to correct the causes of visible emissions that appear to exceed allowable opacity limits; or

    b. If practical, have a certified visible emissions observer take an EPA Method 9 observation of the plume and record the results, and take immediate action to correct causes of fugitive emissions in excess of allowable opacity limits in accordance with 40 CFR Part 60, Appendix A-4, "Test Methods 6 through 10B: Method 9—Visual Determination of the Opacity of Emissions from Stationary Sources."

18. Visible emissions checks do not require a certified observer, except where visible emissions appear to exceed the allowable opacity limit and exceed 30 seconds in duration, and an EPA Method 9 observation is made to establish it does not exceed the standard. *[NSR—ATC Section IV-D, Condition 14 (10/18/12)]*

19. The permittee shall conduct daily inspections on all water spray systems used during the material processing to verify they are working effectively and to make corrections where spray systems are not operating effectively. *[NSR—ATC Section IV-D, Condition 15 (10/18/12)]*

20. Post-construction monitoring activities shall be subject to DAQ ambient monitoring policy, the EPA interim document for continuous PM_{10} monitoring, and the relevant provisions of 40 CFR Parts 50, 51, 52, 53, and 58. *[NSR—ATC Section IV-C, Condition 16 (10/18/12)]*

Portable Crushing Plant

21. The permittee shall use EPA Test Method 9 to comply with the opacity requirements of 40 CFR Part 60, Subpart OOO. *[40 CFR Parts 60.672, 60.675 and 40 CFR Part 60.11]*

22. The permittee shall monitor the throughput of the portable crushing plant (EUs: PC00 through PC07) *[Part 70 OP Minor Revision (8/22/2019), AQR 12.5.2.6(d)]*;

23. The permittee shall install a nonresettable hour meter and monitor the hours of operation of the diesel engine (EU: PC09) *[Part 70 OP Minor Revision (8/22/2019), AQR 12.5.2.6(d)]*;

24. The permittee shall monitor the VMT of the haul road (EU: PC08) *[Part 70 OP Minor Revision (8/22/2019), AQR 12.5.2.6(d)]*;

Drilling and Blasting

25. The permittee shall monitor the number of drilled holes (EU: A001b) and calculate, on a monthly basis, as a consecutive 12-month total. *[AQR 12.5.2.6(d)]*

26. The permittee shall monitor the blasting area (EU: A001a) in square feet. *[AQR 12.5.2.6(d)]*

27. The permittee shall monitor the number of blast per year (EU: A001a) and calculate, on a monthly basis, as a consecutive 12-month total. *[AQR 12.5.2.6(d)]*

28. The permittee shall monitor the amount of ANFO explosive in tonnage and calculate, on a monthly basis, the usage as a consecutive 12-month total (EU: A001a). *[AQR 12.5.2.6(d)]*

Compliance Assurance Monitoring

29. Only emission units at the source with precontrol emissions exceeding 100 tons per year are subject to the CAM rule (Table III-E-1 lists the emission unit at the facility that is subject to the CAM rule). *[AQR 12.5.2.6(d)]*

Table III-E-1: Emission Units Subject to CAM

EU	Description	Control Device	Precontrol PM_{10} Emissions (tpy)
D014	Astec Drum Mixer	Baghouse	161.70

30. Measurements of baghouse pressure drop and a daily Method 9 were chosen as CAM indicators. Table III-E-2 presents the key elements of this monitoring approach. *[AQR 12.5.2.6(d)]*

Table III-E-2: CAM Monitoring Approach—PM_{10}

CAM Element	Indicator 1	Indicator 2
Indicator	Pressure drop (Δp) across baghouse.	Daily Method 9 (opacity)
Measurement Approach	Pressure drop is measured each operating day. An internal inspection of the baghouse is performed monthly.	An EPA Method 9 is conducted daily.
Indicator Range	The baghouse pressure drop will be monitored for compliance, and be between 1.0 and 6.0 inches of water when the drum mixer is operating.	Opacity is limited to 20% for an aggregate 6-minute period during any 60-minute period.
Action Threshold	The action threshold for Δp is outside of 2.0 to 6.0 inches of water. Action thresholds trigger an inspection and corrective action, or documentation that the system is operating normally.	Not applicable.
QIP Thresholds	None selected.	More than three (3) excursions within a semiannual reporting period.

CAM Element	Indicator 1	Indicator 2
Performance Criteria Data Representativeness	Filterable PM_{10} emissions are measured every 5 years using a Method 5.	Observations are made at the baghouse exhaust.
Verification of Operational Status	Not applicable.	Not applicable.
QA/QC Practices and Criteria	The pressure gauge will be calibrated or replaced annually.	The visible emissions observer will be familiar with baghouse operations and visible emissions.
Monitoring Frequency	Daily.	Daily.
Data Collection Procedures	The pressure drop is measured each operating day and the baghouse exterior inspected. An internal inspection of the baghouse is performed monthly.	A Method 9 test is performed and documented daily.
Averag Period	Not applicable.	Opacity is limited to 20% for an aggregate 6-minute period during any 60-minute period.

F. TESTING

1. Performance testing is subject to 40 CFR Part 60 (as amended) and *Clark County Department of Air Quality Guideline for Source Testing (9/19/2019)*. Performance testing shall be the instrument for determining compliance with emission limitations set forth in this OP. *[AQR 12.5.2.8(a)]*

2. Compliance with the PM_{10}, NO_x, and CO emissions standards specified in this OP for the asphalt plant drum mixer shall be demonstrated at least once every five years with the EPA methods referenced in Table III-F-1 (EU: D014). The automated burner optimizing system shall be calibrated at least during every performance test. *[AQR 12.5.2.8(a)]*

Table III-F-1: Asphalt Drum Mixer Performance Testing Requirements (EU: D014)[1]

Test Point	Pollutant	Method	Frequency
Exhaust Outlet Stack	PM	EPA Method 5	Every 5 Years
Exhaust Outlet Stack	NO_x	EPA Method 7E	Every 5 Years
Exhaust Outlet Stack	CO	EPA Method 10 analyzer	Every 5 Years
Stack Gas Parameters	—	EPA Methods 1, 2, 3 or 3A, and 4	Every 5 Years

[1]Refer to Table III-C-1 for baghouse identification.

3. Compliance with the opacity and particulate matter standards specified in Table III-F-2 for baghouse stacks shall be demonstrated in accordance with 40 CFR Part 60, Appendix A: Method 9 (Standards for Opacity) conducted and recorded every 5 years and 40 CFR Part 60, Appendix A: Reference Method 5 or 17 (PM concentration), conducted and recorded initially and at least once every five years. *[AQR 12.5.2.8(a) and 40 CFR Part 60.93]*

Table III-F-2: Opacity and PM Testing Standards and Frequencies

Baghouse ID	Applicable Limits		Stack Test Frequency
	Opacity	PM Limit	
DC1	7% - Subpart OOO	0.05 g/dscm - Subpart OOO	Every 5 Years
DC2	7% - Subpart OOO	0.05 g/dscm - Subpart OOO	Every 5 Years
DC3	7% - Subpart OOO	0.05 g/dscm - Subpart OOO	Every 5 Years
DC4	7% - Subpart OOO	0.05 g/dscm - Subpart OOO	Every 5 Years
Astec 200 hp (twin) Pulsejet	20% - Subpart I	0.04gr/dscf - Subpart I	Every 5 Years
WAMFLO Process F	20%	(not subject to NSPS)	Every 5 Years
C&W 10 hp Process F	20%	(not subject to NSPS)	Every 5 Years

4. The permittee shall conduct additional performance tests when any emission unit increases its hourly production rate beyond the rate permitted and at which performance testing was conducted, or when any equipment addition or modification increases the potential to emit. *[AQR 12.5.2.8(a)]*

5. The permittee shall conduct performance testing on the diesel-powered engine (EUs: A123 & A123c) to demonstrate compliance with the emission standards in this permit according to the following conditions: *[AQR 12.5.2.8(a) & 40 CFR Part 63, Subpart ZZZZ]*

   a. Testing shall be in accordance with the provisions of 40 CFR Part 63.7(a)(2) and the performance testing requirements in 40 CFR Part 63, Subpart ZZZZ, Tables 4 and 5, as applicable;

   b. Initial performance tests on the engine (EUs: A123 & A123c) shall be conducted no later than 180 days after the issuance date of this permit for affected sources subject to the requirements of 40 CFR Part 63.6595; and

6. The permittee shall conduct performance testing on the portable crushing plant (EUs: PC01 through PC06) to demonstrate compliance with the emission standards in this permit according to the following conditions: *[AQR 12.5.2.8(a) & 40 CFR Part 60, Subpart OOO]*

   a. Testing shall be in accordance with the provisions of 40 CFR Part 60 and the performance testing requirements in 40 CFR Part 60, Subpart OOO, as applicable;

   b. Initial performance tests on affected emission units 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 start-up.

   c. Subsequent Method 9 performance testing shall be conducted upon written notification from the Control Officer. *[AQR 4.2]*

G. RECORDKEEPING

1. All records and logs required by this document shall be kept by the permittee and made available to the Control Officer for inspection immediately upon request. *[AQR 12.5.2.8(a)]*

2. All records and logs, or copies, shall be kept on-site for a minimum of five years from the date the measurement or data was entered. *[AQR 12.5.2.8(a)]*

3. The permittee shall maintain the following records on-site for reporting: *[AQR 12.5.2.8(a)]*

   a. Monthly, consecutive 12-month total production of materials by each process/plant, as listed in Section III-C of this permit;

   b. Monthly, consecutive 12-month total hours of operation of each engine (EUs: A123, A123b, A123c, RS10, & CY09);

   c. Monthly, consecutive 12-month total amount of diesel and propane fuel used in the hot oil heaters (EUs: D026 & D027);

   d. Monthly, consecutive 12-month total amount of blasting agent, number of holes drilled, number of blasts, and square feet of area blasted (EUs: A001a & A001b);

   e. Monthly, consecutive 12-month total hours of operation of the propane-fired water heater (EU: F023);

   f. Monthly, consecutive 12-month total VMT of on-site haul roads (EU: H06);

   g. Monthly, total area of stockpiles at a time (EU: G01);

   h. Monthly, consecutive 12-month hours of operation of the media blasting unit (EU: MB01);

   i. Monthly, consecutive 12-month total throughput of gasoline (EUs: FT01 & FT02);

   j. Monthly, consecutive 12-month total throughput at the portable crushing plant (EUs: PC00 through PC07)

   k. Monthly, consecutive 12-month total VMT at the portable crushing plant haul road (EU: PC08);

   l. Monthly, consecutive 12-month total hours of operation of the portable crushing plant engine (EU: PC09); and

   m. Annual emissions for each unit and for each plant in tons per year. (Reported annually)

4. The permittee shall maintain records on-site that include, at a minimum: *[AQR 12.5.2.8(a)]*

   a. Total amount of diesel fuel purchased (in gallons) for all engines (EUs: A123, A123b, A123c, RS10, & CY09);

   b. Inspection logs from Method 9 observations *[40 CFR Part 60.676(f)]*;

   c. The dates and times of visible emissions checks, the name of the person conducting the check, the results of the check, and the type of corrective action taken (if required);

   d. Logs from daily water spray inspections;

   e. Log of dust control measures applied to roads, surfaces, lots, etc.;

f. Daily amount of blasting agent, number of holes drilled, number of blasts, and square feet of area blasted (EUs: A001a & A001b);

g. Logs of recorded current and predicted weather as required for blasting in Condition III-D-20 on days when blasting occurs;

h. Purchase records of Earthbind 100, or a product with similar specification, that will be used with the dust abatement injection system; *[HOO November 14, 2019]*

i. Manufacturer's engine data showing compliance with the emission standards;

j. Daily readings of pressure drop across each baghouse;

k. Monthly baghouse and bin vent inspections;

l. Instances of the required daily opacity readings on bin vents, baghouses, and/or stack discharges where visible emissions were observed, and descriptions of any action taken;

m. A minimum of hourly readings of the automated air-to-fuel ratio control system that optimizes burner performance on the asphalt plant drum mixer (EU: D014) during operation;

n. Maintenance on all emission control devices;

o. Ambient air monitoring station data;

p. Records of burner efficiency tests (EU: F023);

q. Monthly throughput on the weigh belt after the primary crusher (EU: A02);

r. Annual emissions for each emission unit in tons per year; and

s. Results of performance testing.

5. For all inspections, visible emission checks, and testing required under monitoring, the logs, reports, and records shall include 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 12.5.2.8(a)]*

6. The permittee is required to comply with the recordkeeping requirements of 40 CFR Part 60, Subpart OOO and I. *[40 CFR Part 60.676 and 40 CFR 60.92]*

7. Records and data required by this permit and maintained by the permittee may be audited, at the permittee's expense, at any time by a third party selected by the Control Officer. *[AQR 12.5.2.8(a)]*

H. REPORTING

1. All report submissions shall be addressed to the attention of the Control Officer. *[AQR 12.5.2.8(e)(4)]*

2. All reports shall contain the following: *[AQR 12.5.2.6(d)]*

a. A certification statement on the first page, e.g., "I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate and complete" (a sample form is available from DAQ); and

b. A certification signature from a responsible official of the company and the date of certification.

3. The permittee shall submit semiannual reports to the Control Officer. *[AQR 12.5.2.6(d)]*

4. The following requirements apply to semiannual reports: *[AQR 12.5.2.6(d)]*

a. The report shall include each item listed in Section III-G-3 of this permit.

b. The report shall include semiannual summaries of any permit deviations, their probable cause(s), and corrective or preventative action(s) taken.

5. Regardless of the date of issuance of this permit, the source shall comply with the schedule for report submissions outlined in Table III-H-1. *[AQR 12.5.2.6(d)]*

Table III-H-1: Required Report Submission Dates

Required Report	Applicable Period	Due Date
Semiannual report for 1st six-month period	January, February, March, April, May, June	July 30 each year[1]
Semiannual report for 2nd six-month period; any additional annual records required	July, August, September, October, November, December	January 30 each year[1]
Annual Compliance Certification Report	Calendar year	January 30 each year[1]
Annual Emissions Inventory Report	Calendar year	March 31 each year[1]
Annual Emissions Statement[2]	Calendar year	March 31 each year[1]
Notification of Malfunctions, Startup, Shutdowns or Deviations with Excess Emission	As required	Within 24 hours of when permittee learns of the event.
Report of Malfunctions, Startup, Shutdowns or Deviations with Excess Emission	As required	Within 72 hours of notification to DAQ.
Deviation Report without Excess Emissions	As required	Along with semiannual reports.[1]
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[1]
Performance Testing	As required	Within 60 days of the end of the test.[1]

[1]If the due date falls on a Saturday, Sunday, or federal or Nevada holiday, the submittal is due on the next regularly scheduled business day.

[2] Required only for stationary sources that emit 25 tons or more of nitrogen oxide (NO_X) and/or emit 25 tons or more of volatile organic compounds (VOC) during a calendar year.

6. The Control Officer reserves the right to require additional reports and reporting to verify compliance with permit conditions, permit requirements, and requirements of applicable federal regulations. *[AQR 4.4 & AQR 12.5.2.6(d)]*

7. This source is required to comply with the reporting and notification requirements of 40 CFR Part 60, Subpart OOO, and 40 CFR Part 60, Subpart I. *[40 CFR Part 60.676]*

I. MITIGATION

The source has no federal offset requirements associated with this permitting action. *[AQR 59.1.1]*

IV. OTHER REQUIREMENTS

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 chlorofluorocarbon or hydrochlorofluorocarbon compound 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]*

V. PERMIT SHIELD

Compliance with the terms contained in this permit shall be deemed compliance with the applicable requirements (Table V-1) in effect on the date of permit issuance. *[AQR 12.5.2.9]*

Table V-1: Applicable Requirements Related to Permit Shield

Citation	Title
40 CFR Part 60, Subpart IIII	"Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
40 CFR Part 63, Subpart ZZZZ	"National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
40 CFR Part 60, Subpart OOO	"Standards of Performance for Nonmetallic Mineral Processing Plants"
40 CFR Part 60, Subpart I	"Standards of Performance for Hot Mix Asphalt Facilities"
40 CFR Part 64.2	"Compliance Assurance Monitoring: Applicability."
40 CFR Part 98, Subpart C	"Mandatory Greenhouse Gas Reporting: General Stationary Fuel Combustion Sources"
AQR 26.1	"Emission of Visible Air Contaminants: Opacity Limits"
AQR 45.1	"Idling of Diesel Powered Motor Vehicles: Diesel Powered Motor Vehicle Idling"

ATTACHMENT 1

APPLICABLE REGULATIONS

1. NRS, Chapter 445B.
2. Applicable AQR sections, as listed in the table below.

Citation	Title
AQR 0	"Definitions"
AQR 4	"Control Officer"
AQR 5	"Interference with Control Officer"
AQR 8	"Persons Liable for Penalties – Punishment: Defense"
AQR 9	"Civil Penalties"
AQR 10	"Compliance Schedules"
AQR 11	"Ambient Air Quality Standards"
AQR 12.4	"Authority to Construct Application and Permit Requirements for Part 70 Sources"
AQR 12.5	"Part 70 Operating Permit Requirements"
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 Contents of Fuel Oil"
AQR 40	"Prohibitions of Nuisance Conditions"
AQR 41	"Fugitive Dust"
AQR 42	"Open Burning"
AQR 43	"Odors in the Ambient Air"
AQR 60	"Evaporation and Leakage"
AQR 70	"Emergency Procedures"
AQR 80	"Circumvention"

3. CAAA authority: 42 U.S.C. § 7401, et seq.
4. Applicable 40 CFR sections, as listed in the table below.

Citation	Title
40 CFR Part 52.21	"Prevention of significant deterioration of air quality."
40 CFR Part 52.1470, Subpart DD	"Approval and Promulgation of Implementation Programs: Nevada"
40 CFR Part 60, Subpart A	"Standards of Performance for New Stationary Sources: General Provisions"
40 CFR Part 60, Subpart I	"Standards of Performance for Hot Mix Asphalt Facilities"
40 CFR Part 60, Subpart OOO	"Standards of Performance for Nonmetallic Mineral Processing Plants"
40 CFR Part 60, Subpart IIII	"Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
40 CFR Part 60, Appendix A-4	"Test Methods 6 through 10B"
40 CFR Part 63, Subpart ZZZZ	"National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
40 CFR Part 70	"Federal Operating Permit Programs"
40 CFR Part 82	"Protection of Stratospheric Ozone"

EXHIBIT 3

EXHIBIT 3

DES
DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY
air quality desert conservation sustainability

4701 W. Russell Road 2nd Floor
Las Vegas, NV 89118-2231
Phone: (702) 455-5942 • Fax: (702) 383-9994
Marci Henson, Director

Notice of Violation Response Form

Issued to: Holcim - SWR, Inc.

NOV #: 10030 Return form by: 7/3/2024

Items below are to be completed by the Respondent

Responsible Official: Ken Kinnard
Title: Quarry Manager
Phone Number: 702-740-7387
Email Address: ken.kinnard@aggregate-us.com
Mailing Address: 5300 Sloan Rd, Sloan, NV 89054

Please check applicable boxes below

☐ **We do not contest the Notice of Violation (Attendance is not required)**
We accept responsibility for this violation. Instructions for payment of the recommended penalty will be provided after the Hearing Officer meeting.

☑ **We are contesting the Notice of Violation and request to appear before the Hearing Officer (Attendance by the Responsible Official or a representative of the company is strongly recommended to contest the violation)**
Please attach a written explanation, including supporting documentation, of why you are contesting the NOV. This information will be provided to the Hearing Officer prior to the Hearing.

We will be contesting the:

☐ Facts
☐ Penalty
☑ Both

Ken Kinnard
Signature of Authorized Person
Date: 6/27/24

Completed forms can be submitted to Pam Thompson via mail at Clark County Department of Environment and Sustainability, Division of Air Quality, 4701 West Russell Road, Suite 200, Las Vegas, NV 89118-2231, fax at (702) 383-9994, or via email at aqenforcement@clarkcountynv.gov.

HOLCIM

July 3, 2024

Clark County Department of Environment and Sustainability
Division of Air Quality-Compliance Section
Pam Thompson
4701 W. Russell Road 2nd Floor
Las Vegas, NV 89118

RE: **Notice of Violation (NOV) #10030, Holcim-SWR, Inc.-Sloan Quarry (Part 70 Operating Permit, Source ID:372)**

Dear Mrs. Thompson:

Notice of Violation (NOV) #10030 dated June 26, 2024 Exhibit A references 2022 Permit Condition III.B.31. After reviewing the AQR 41.1.2, it is designed to cover stockpiles and not road dust. The NOV cites to the permit condition, but both state "shall not cause or permit the *handling, transporting, or storage of any material* in a manner that allows or may allow controllable particulate matter to become airborne.".

The dust on the roadway that was kicked up by the haul truck was not the "handling, transporting, or storage" of material.

The videos, have not established causation. They merely assert that it was "observed... coming from the Facility grounds."

Should you have questions or require additional information please do not hesitate to contact Aaron Lund, Environmental & Land Manager at aaron.lund@holcim.com or 702-274-4299.

Sincerely,

Aaron Lund
Environmental Manager
Holcim-SWR, Inc.

EXHIBIT 4

EXHIBIT 4

BEFORE THE AIR POLLUTION CONTROL HEARING OFFICER

CLARK COUNTY, NEVADA

In the Matter of the Notice of Violation #10030 Issued to HOLCIM – SWR, INC., Respondent.	ORDER

The above-entitled matter was heard on July 18, 2024, before Hearing Officer Holly Fic. Representatives of both the Clark County Department of Environment and Sustainability, Division of Air Quality (**Air Quality**) and HOLCIM – SWR, INC. (**HOLCIM**) appeared, testified and submitted evidence for consideration by the Hearing Officer. Having considered the evidence presented at the hearing, the Hearing Officer hereby finds and orders as follows:

1. Notice of Violation (**NOV**) #10030 was issued by Air Quality to Respondent HOLCIM on June 26, 2024, for alleged violations of Part 70 Operating Permit, Source ID: 372, issued on November 6, 2019 (**2019 Permit**), revised and reissued on April 16, 2020 (**2020 Permit**), November 24, 2021 (**2021 Permit**), and July 13, 2022 (**2022 Permit**), and the Clark County Air Quality Regulations (**AQRs**). HOLCIM operates a stationary source consisting of a sand and gravel, hot mix asphalt, and ready-mix concrete facility at 5300 Sloan Road, in Clark County, Nevada (**Facility**). The violation(s) alleged in the NOV include:

(a) Violation of 2022 Permit condition III.B.31 for allowing controllable particulate matter from the Haul Road (Emission Unit: H06) to become airborne.

2. The penalty recommended by Air Quality in NOV #10030 was $1,500.00.

3. The Hearing Officer finds that the violation(s) alleged in NOV #10030 occurred in that HOLCIM violated 2022 Permit condition III.B.31.

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4. **IT IS HEREBY ORDERED** that HOLCIM pay a penalty of One Thousand Five Hundred and no/100 Dollars ($1,500.00). Seven Hundred Fifty and no/100 Dollars ($750.00) is due within 30 days of the date of this ORDER. Seven Hundred Fifty and no/100 Dollars ($750.00) shall be held in abeyance. If HOLCIM does not violate AQRs before July 18, 2025, and pays the reduced penalty within 30 days of the date of this ORDER, the portion of the penalty that is held in abeyance shall be waived. If HOLCIM does violate AQRs before that time or does not pay the reduced penalty within 30 days of the date of this ORDER, then the portion of the penalty that is held in abeyance will be due within 30 days of the issuance of the Hearing Officer Order finding HOLCIM in violation.

5. HOLCIM has the right to appeal this ORDER to the Clark County Air Pollution Control Hearing Board. Any appeal of this ORDER shall be: (1) in writing specifying the reasons for the appeal, (2) accompanied by a filing fee of One Hundred Forty and no/100 Dollars ($140.00), and (3) received by Air Quality within ten (10) days of HOLCIM's receipt of this ORDER.

DATED this 24th day of July, 2024.

Holly Fic
Holly Fic (Jul 24, 2024 08:44 PDT)

Holly Fic
Hearing Officer

BEFORE THE AIR POLLUTION CONTROL HEARING OFFICER

CLARK COUNTY, NEVADA

In the Matter of the Notice of Violation #10030 Issued to HOLCIM – SWR, INC., Respondent.	ORDER

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DATED this 24th day of July, 2024.

Holly Fic (Jul 24, 2024 08:44 PDT)

Holly Fic
Hearing Officer

DES
DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY
air quality | desert conservation program | sustainability

4701 W. Russell Road 2nd Floor
Las Vegas, NV 89118-2231
Phone: (702) 455-5942 • Fax: (702) 383-9994
Marci Henson, Director

Notice of Violation Response Form

Issued to: Holcim - SWR, Inc.

NOV #: 10030 Return form by: 7/3/2024

Items below are to be completed by the Respondent

Responsible Official: Ken Kinnard
Title: Quarry Manager
Phone Number: 702-740-7387
Email Address: ken.kinnard@aggregate-us.com
Mailing Address: 5300 Sloan Rd, Sloan, NV 89054

Please check applicable boxes below

☐ **We do not contest the Notice of Violation (Attendance is not required)**
We accept responsibility for this violation. Instructions for payment of the recommended penalty will be provided after the Hearing Officer meeting.

☑ **We are contesting the Notice of Violation and request to appear before the Hearing Officer (Attendance by the Responsible Official or a representative of the company is strongly recommended to contest the violation)**
Please attach a written explanation, including supporting documentation, of why you are contesting the NOV. This information will be provided to the Hearing Officer prior to the Hearing.

We will be contesting the:

☐ Facts
☐ Penalty
☑ Both

Ken Kinnard
Signature of Authorized Person
Date: 6/27/24

Completed forms can be submitted to Pam Thompson via mail at Clark County Department of Environment and Sustainability, Division of Air Quality, 4701 West Russell Road, Suite 200, Las Vegas, NV 89118-2231, fax at (702) 383-9994, or via email at aqenforcement@clarkcountynv.gov.

July 3, 2024

Clark County Department of Environment and Sustainability
Division of Air Quality-Compliance Section
Pam Thompson
4701 W. Russell Road 2nd Floor
Las Vegas, NV 89118

RE: **Notice of Violation (NOV) #10030, Holcim-SWR, Inc.-Sloan Quarry (Part 70 Operating Permit, Source ID:372)**

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The videos, have not established causation. They merely assert that it was "observed... coming from the Facility grounds."

Should you have questions or require additional information please do not hesitate to contact Aaron Lund, Environmental & Land Manager at aaron.lund @holcim.com or 702-274-4299.

Sincerely,

Aaron Lund
Environmental Manager
Holcim-SWR, Inc.

DES
DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY
4701 W. Russell Road 2nd Floor
Las Vegas, NV 89118-2231
Phone: (702) 455-5942 • Fax: (702) 383-9994
Marci Henson, Director

June 26, 2024

FEDERAL EXPRESS TRK #7770 8529 3263
Ahmed Hamadi, Vice President, General Manager, and Responsible Official
E-mail: ahmed.hamadi@holcim.com
Ken Kinnard, Quarry Manager and Responsible Official
E-mail: ken.kinnard@holcim.com
Holcim - SWR, Inc.
4675 West Teco Avenue, Suite 140
Las Vegas, NV 89118

FEDERAL EXPRESS TRK #7770 8534 7381
Kevin Peart, President
Holcim - SWR, Inc.
1687 Cole Boulevard,
Lakewood, CO 80401

NOTICE OF VIOLATION #10030

Clark County Department of Environment and Sustainability, Division of Air Quality (**Air Quality**) provides this notice to Holcim - SWR, Inc. (**Holcim**), for the violation of Clark County Air Quality Regulations (**AQRs**) and permit conditions as alleged below and recommends a civil penalty of One Thousand Five Hundred and no/100 Dollars ($1,500.00) be assessed as shown in the penalty calculation table attached hereto as **Exhibit A** and incorporated herein by reference.

I. FACTS

A. On November 6, 2019, Air Quality issued a Part 70 Operating Permit, Source ID: 372 (**2019 Permit**), to Aggregate Industries SWR, Inc., which authorized the operation of a sand and gravel, hot mix asphalt, and ready-mix concrete facility known as Aggregate Industries SWR, Inc. Sloan Quarry located at 5300 Sloan Road, in Clark County, Nevada (**Facility**). On April 16, 2020, the permit was reopened and revised to include a portable crushing and screening plant and associated diesel engine and haul road, remove the subsequent performance testing requirement for two engines, and incorporate the permit-applicable requirements of a Hearing Officer's Order (**HOO**) dated December 14, 2019, for Notices of Violation #9307 and #9312, including a restriction on the operation of certain stackers during wind events and the requirement to install and operate a dust abatement system (**2020 Permit**).

On November 24, 2021, the permit was reopened and revised to include $PM_{2.5}$ emissions for the processing operations, recently promulgated fugitive dust requirements, and emissions statements from stationary sources of NO_x and/or VOCs (**2021 Permit**). On July 13, 2022, Air Quality issued an administrative revision to the permit (**2022 Permit**) changing the company name to Holcim - SWR, Inc. and the source name to Holcim - SWR Inc.: Sloan Quarry.

B. On Wednesday, May 29, 2024, at approximately 12:20 p.m., Air Quality received a complaint (#75973) alleging Holcim was causing fugitive dust emissions (**Exh. B, Att. 1**). At approximately 1:12 p.m., Air Quality Specialist Joshua Frye (**Frye**) arrived in the area to conduct a complaint investigation. The Complaint Investigation Form (**Investigation**) is attached hereto as **Exhibit B** and incorporated herein. Approximately 15 minutes later, as he was heading northwest on Sloan Road, Frye observed a large plume of fugitive dust coming from the Facility grounds near the West Screening Plant (**Exh. B, Att. 2, Videos 1 through 3**). Frye then checked in at the main office and met with Ken Kinnard (**Kinnard**), Quarry Manager and Responsible Official for Holcim. Frye notified Kinard of his observations. Kinnard escorted Frye to the West Screening Plant. While returning to the main office, Frye observed a haul truck generating fugitive dust emissions on the Haul Road (Emission Unit (**EU**): H06) near the truck scales (**Exh. B: Att. 2, Video 4; and Att. 3, Photograph 1**). Frye departed the area at approximately 2:15 p.m. at which time he observed water trucks and street sweepers operating on the haul roads. During the Investigation, Frye identified the following deficiency:

1. Holcim allowed controllable particulate matter from the Haul Road (EU: H06) to become airborne on May 29, 2024 (**Exh. B: Att. 2, Videos 1 through 4; and Att. 3, Photograph 1**).

C. On June 3, 2024, Frye emailed Kinnard and Ahmed Hamadi (**Hamadi**), Vice President, General Manager, and Responsible Official for Holcim, a summary of the deficiency identified during his Investigation (**Exh. B, Att. 4**).

II. VIOLATION(S)

Violation 1:

By allowing controllable particulate matter from the Haul Road (EU: H06) to become airborne, Holcim violated 2022 Permit condition III.B.31 (Deficiency I.B.1).

2022 Permit condition III.B.31 states:

"31. The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner that allows or may allow controllable particulate matter to become airborne. *[AQR 41.1.2]*"

III. RECOMMENDED CIVIL PENALTY

Pursuant to AQR Section 9.1, any person who violates any provision of the AQRs, including any Permit condition; is guilty of a civil offense and shall pay a civil penalty not to exceed $10,000 per violation. Each day of violation constitutes a separate offense.

Air Quality recommends a civil penalty in the amount of $1,500.00 (**Exh. A**).

IV. HEARING

Air Quality has scheduled a hearing for **Thursday, July 18, 2024, at 9:00 a.m.** before the Air Pollution Control Hearing Officer to adjudicate the alleged violation(s) and, if appropriate, to levy the recommended penalty. Please complete the enclosed "**Notice of Violation Response Form"** and return it to Air Quality by July 3, 2024. At the hearing, the Hearing Officer will hear evidence on the alleged violation(s) and render a decision. The hearing will be held at the Clark County Building Services Presentation Room, located at 4701 West Russell Road, Las Vegas, Nevada.

If you intend to present any documentary evidence at the hearing, please provide copies of your evidence to Air Quality with the completed Notice of Violation Response Form. If you fail to provide copies of your evidence prior to the hearing, please be advised that Air Quality may request a continuance to have time to review the evidence you brought, which will result in the hearing being postponed and rescheduled to a later date.

If the Hearing Officer finds you in violation and levies a penalty, Air Quality staff will mail the Hearing Officer's order to you along with instructions on remittance of the penalty.

Shibi Paul (Jun 26, 2024 16:09 PDT)

for

Marci Henson,
Control Officer

Exhibit(s):
A. Penalty Calculation Table, NOV #10030
B. Air Quality Complaint Investigation Form, with attachments, dated June 5, 2024

sjg

DES
DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY
air quality desert conservation PROGRAM sustainability
4701 W. Russell Road 2nd Floor
Las Vegas, NV 89118-2231
Phone: (702) 455-5942 • Fax: (702) 383-9994
Marci Henson, Director

Exhibit A

NOV # 10030
Penalty Calculation Table
Holcim - SWR, Inc.

Viol.	Date(s)	Violation Description	EUs or CDs	AQR Section or Permit Condition	Exhibit / Evidence	Base Penalty[1]		Days	Aggravating Description	Agg Factor	Agg Amount	Penalty
						Description	Amount					
1	May 29, 2024	Allowed controllable particulate matter to become airborne.	EU: H06	2022 Permit condition III.B.31	Exh. B: Att. 2, Videos 1 thru 4; and Att. 3, Photo 1	Complex/ Moderate	$ 1,500	1	N/A	0%	$ -	$ 1,500.00
											Total Penalty:	**$ 1,500.00**

[1]

Source Classification	Extent of Deviation from Requirement		
	Major	Moderate	Minor
Major	$ 4,000	$ 2,000	$ 1,000
Complex	$ 3,000	$ 1,500	$ 750
Significant	$ 2,000	$ 1,000	$ 500
Baseline	$ 1,000	$ 500	$ 250

Regulatory maximum: $10,000 per day, per violation
[AQR Section 9.1 & NRS 445B.640]

Complaint #: 75973	**Complaint Taken By:** CCDES
Logged Date: 05/29/24	**Logged Time:** 12:19 pm
Date Reported: 05/29/24	**Time Reported:** 12:19 pm
Date Observed: 05/29/24	**Time Observed:** 12:05 pm
Assigned Officer: Joshua Frye	**Time Assigned:** 12:25 pm

DES
DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY
air quality | desert conservation PROGRAM | sustainability

4701 W. Russell Road 2nd Floor
Las Vegas, NV 89118-2231
Phone: (702) 455-5942 • Fax: (702) 383-9994
Marci Henson, Director

Exhibit B

COMPLAINT INVESTIGATION FORM

COMPLAINANT INFORMATION			COMPLAINT INFORMATION		
Name: Anonymous			**Company Name (if known):** Holcim SWR Sloan Quarry		
Address:			**Address or cross-streets:** 5300 Sloan Road		
City:	**State:**	**Zip:**	**City:** Las Vegas	**State:** NV	**Zip:** 89124
Home Phone: **Work Phone:**			**Complaint Type:** Dust ■ Track out ☐ Overspray ☐ Leaks/Spills ☐		
E-mail:			Odor ☐ **Address or cross-streets of odor detection:**		
Preferred Method of Contact: Email ☐ Phone ☐			Other ☐		
Would you like to be contacted when the investigation is complete? Yes ☐ No ■ N/A ☐			**Facility Type:** Aggregate ■ Surface Coater ☐ Gasoline Dispensing ☐ Commercial Building ☐ Asphalt Production ☐ Marijuana Facility ☐ Chemical Manufacturing ☐ Other ☐		
Description of Complaint: The complaint indicated that one of the concrete facilities in the Sloan area was generating fugitive dust visible from the I-15 freeway.					

INVESTIGATION SUMMARY

Is this a Permitted Source? Yes ■ No ☐ Unknown ☐ **If "Yes," Source Name:** Holcim SWR Sloan Quarry **Source ID:** 372

Name (if nonpermitted source):

Address: 5300 Sloan Road **City:** Las Vegas **State:** NV

Responsible Official: Ahmed Hamadi (VP General Manager) **Phone:** (702) 649-6250

Response Date: 05/29/24 **Time In:** 1:45 pm **Time Out:** 2:15 pm

Follow-up Investigation(s) Conducted? Yes ☐ No ■ **If "Yes," list date(s) and time(s):**

Close Out Date: 05/29/24 **Time:** 2:15 pm

Complaint Substantiated? Yes ■ No ☐
(For all odor complaints where odors were detected, complete and attach the Nuisance Odor Investigation Form)

Recommended Action: ■ **Notice of Violation** ☐ **Warning Notice** ☐ **No Action Required**

Comments:

INVESTIGATION NARRATIVE

Applicable Permit:

Part 70 Operating Permit; Source ID: 372, Issued on November 6, 2019, Revised on July 13, 2022 (Permit).

Narrative:

On May 29, 2024, at 12:19 pm, Clark County Department of Environment and Sustainability (Air Quality) received Complaint #75973 via the web portal (**See Attachment 1**). The complaint indicated that there was fugitive dust coming from one of the concrete facilities in the Sloan area and was visible from the I-15 freeway. The complaint was assigned to me at 12:25 pm and I responded at 12:28 pm by departing for the area. I arrived to the area at 1:12 pm and first headed to the Cemex Construction Materials South Plant (Source ID: 15914). I observed the plant operating for approximately 15 minutes and observed no compliance issues. I then made my way to the other side of the I-15 freeway to observe other facilities in the area.

As I was heading northwest on Sloan Road, I observed a large plume of fugitive dust coming from the area of the Holcim SWR Sloan Quarry (Source ID: 372). From the parking lot of the Plant Office, I observed fugitive dust coming from the Facility grounds near the West Screening Plant (**See Attachment 2 - Videos 1-3**). I checked into the Facility and met with Ken Kinnard, Quarry Manager, at approximately 1:45 pm. I explained to Mr. Kinnard the nature of my visit and showed him the fugitive dust evidence that I had collected at that point. Mr. Kinnard escorted me to the area where the dust was coming from, but by the time we had arrived I did not observe any further dust issues. Mr. Kinnard explained that this section of the plant had been shut down for several hours and that possibly a haul truck or a loader had generated the dust I observed. As we made our way back towards the main office, we passed the truck scales where I observed a haul truck generating fugitive dust (**See Attachment 2 - Video 4 and Attachment 3 - Photograph 1**) on the Haul Road [Emission Unit (EU: H06)]. Mr. Kinnard directed the water truck crew, over his radio, to address this issue while I was in his presence. While on-site, I did observe at least one water truck and one street sweeper on-site making its way around the facility watering/cleaning the haul roads. I departed the area at 2:15 pm.

The complaint was substantiated and enforcement action is recommended. I emailed the Responsible Official a summary of the deficiency on 06/3/2024 (**See Attachment 4**).

Deficiency:

1. The Facility allowed controllable particulate matter from facility grounds and haul roads (EU: H06) to become airborne; therefore, the Facility ***was not in compliance with condition III.B.31 of the Permit.***

Note: This deficiency is recommended for formal enforcement action.

Joshua Frye	06/03/24	Camon Liddell	06/03/24	Scott Jelinek	06/05/24
Compliance Officer	**Date**	**Senior Review**	**Date**	**Supervisor Review**	**Date**

Attachments

Attachment 1: Complaint #75973.

Attachment 2: Videos 1-4.

Attachment 3: Photograph 1.

Attachment 4: Deficiency email dated on 06/03/2024.

Attachment 1

ATTACHMENT 1

Complaint No. 75973

OBSERVED ON
May 29, 2024 12:05 PM

REPORTED ON
May 29, 2024 12:19 PM

COMPLAINT DESCRIPTION
A large dust cloud appears to be coming from a cement plant near Sloan, NV. It's visible from the I15 freeway.

PROBLEM LOCATION
I15 Southbound at Sloane

INTAKE METHOD
Online

TYPE
Fugitive Dust

IS THE FUGITIVE DUST OCCURRING NOW?
Yes

DO YOU KNOW WHAT IS CREATING THE FUGITIVE DUST?
Stockpiling

CATEGORY
Stationary Source Program

ASSIGNED TO
Joshua Frye

Response

RESPONDED ON
May 29, 2024 12:28 PM

CLOSED ON
May 29, 2024 2:15 PM

Location

STATIONARY SOURCE
HOLCIM SWR SLOAN QUARRY (00372)

5300 SLOAN RD, LAS VEGAS, NV 89124

TYPE
AGGREGATE PROCESSING

NAICS CODE
212321

ADDRESS
5300 Sloan Rd., Sloan, NV 89124

PARCEL NUMBER
—

MAJOR CROSS STREETS
—

Complainant

NAME
None

EMAIL
—

COMPLAINANT WANTS INVESTIGATION FINDINGS?
No

Attachment 2

ATTACHMENT 2

Video 1: Wide angle view of fugitive dust coming from Facility grounds [Video taken by Joshua Frye]

Video 2: Wide angle view of fugitive dust coming from Facility grounds [Video taken by Joshua Frye]

Video 3: Wide angle view of fugitive dust coming from Facility grounds [Video taken by Joshua Frye]

Video 4: View of fugitive dust created by haul truck on Haul Road (EU: H06) [Video taken by Joshua Frye]

Attachment 3

ATTACHMENT 3

Photograph 1: View of fugitive dust created by haul truck on Haul Road (EU: H06). [Photo taken by Joshua Frye]

Attachment 4

ATTACHMENT 4

Joshua Frye

From: Joshua Frye
Sent: Monday, June 3, 2024 8:02 AM
To: AHMED.HAMADI@HOLCIM.COM
Cc: KEN.KINNARD@HOLCIM.COM; AQ Small Business Assistance Program
Subject: Source Name: Holcim SWR Sloan Quarry - Source ID: 372 - Deficiency identified during Complaint Investigation

Importance: High

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Hamadi:

On 5/30/2024, I met with Ken Kinnard and performed a Complaint Investigation (CI) of Holcim SWR Sloan Quarry, located at 3500 Sloan Rd. During that CI, I identified the following deficiency:

1. The Facility allowed controllable particulate matter from Facility grounds and haul roads to become airborne, which is not complaint with permit condition III.B.31 of the Part 70 Operating Permit issued November 6, 2019, revised July 13, 2022.

The deficiency noted above for Holcim SWR Sloan Quarry is my preliminary findings and should be corrected immediately. The Division of Air Quality **may** issue a Notice of Violation even if the deficiency is corrected. Once the CI report is internally finalized, you may receive further documentation which will officially identify all the deficiencies. If you have any questions regarding this matter, please contact me via email or call me at the telephone number below.

Also, if you need assistance to comply with your permit requirements or to understand the applicable Clark County Air Quality Regulations, you may contact our Small Business Assistance Program (SBAP), which is a free and confidential service, at (702) 455-5942, or by email at AQSBAP@ClarkCountyNV.gov.

Please confirm receipt of this email by June 6, 2024.

Sincerely,

Joshua Frye
Air Quality Specialist I, Compliance Section
Clark County Department of Environment and Sustainability
Division of Air Quality
4701 W. Russell Rd, Suite 200
Las Vegas, NV 89118
Mon-Thu 7am-5:30pm
702-901-3674 – Mobile
702-455-1641 – Office

July 03, 2024

Dear Customer,

The following is the proof-of-delivery for tracking number: 777085293263

Delivery Information:			
Status:	Delivered	**Delivered To:**	Receptionist/Front Desk
Signed for by:	C.CAMI	**Delivery Location:**	
Service type:	FedEx Standard Overnight		
Special Handling:	Deliver Weekday		LAS VEGAS, NV,
		Delivery date:	Jun 28, 2024 09:33

Shipping Information:			
Tracking number:	777085293263	**Ship Date:**	Jun 27, 2024
		Weight:	0.5 LB/0.23 KG

Recipient:	**Shipper:**
LAS VEGAS, NV, US,	LAS VEGAS, NV, US,

Reference	NOV 10030
Purchase Order	4500368555-030

FedEx Express proof-of-delivery details appear below; however, no signature is currently available for this shipment. Please check again later for a signature.

July 03, 2024

Dear Customer,

The following is the proof-of-delivery for tracking number: 777085347381

Delivery Information:

Status:	Delivered	**Delivered To:**	Receptionist/Front Desk
Signed for by:	E.BRISTER	**Delivery Location:**	
Service type:	FedEx Standard Overnight		
Special Handling:	Deliver Weekday		LAKEWOOD, CO,
		Delivery date:	Jun 28, 2024 13:43

Shipping Information:

Tracking number:	777085347381	**Ship Date:**	Jun 27, 2024
		Weight:	0.5 LB/0.23 KG

Recipient:	**Shipper:**
LAKEWOOD, CO, US,	LAS VEGAS, NV, US,

Reference	NOV 10030
Purchase Order	4500368555-030

FedEx Express proof-of-delivery details appear below; however, no signature is currently available for this shipment. Please check again later for a signature.