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## PART 70 OPERATING PERMIT

**SOURCE ID: 00004**

CertainTeed Gypsum Manufacturing, Inc.  
13500 Blue Diamond Road  
Las Vegas, NV 89161

**ISSUED ON: June 2, 2021**

**EXPIRES ON: June 1, 2026**

**Revised on: October 11, 2023**

**Current action: Minor Revision**

**Issued to:**

CertainTeed Gypsum Manufacturing, Inc  
13500 Blue Diamond Road  
Las Vegas, Nevada 89161

**Responsible Official:**

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**NATURE OF BUSINESS:**

SIC code 3275, "Gypsum Products"  
NAICS code 327420, "Gypsum Product Manufacturing"

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

Santosh Mathew, Acting Permitting Manager

## EXECUTIVE SUMMARY

CertainTeed Gypsum Manufacturing, Inc. (CertainTeed) operates a wallboard manufacturing facility located in Clark County, Nevada. CertainTeed is located on Blue Diamond Road, approximately 20 miles west of the city of Las Vegas (T20S, R64E, Section 8) in the Las Vegas Valley, Clark County, Nevada (Hydrographic Area 212). The valley is classified as a moderate nonattainment area for the 2015 O<sub>3</sub> National Ambient Air Quality Standards (NAAQS) as of January 5, 2023, and is an attainment area subject to a maintenance plan for the CO and PM<sub>10</sub> NAAQS.

CertainTeed is a major source for CO, synthetic minor 80 (SM 80) for NO<sub>x</sub>, synthetic minor of PM<sub>10</sub> and a minor source of PM<sub>2.5</sub>, SO<sub>2</sub>, VOC and HAPs, as well as a source of GHG. Emission units included at the source are used for rock crushing and screening, transporting raw rock, mill operations, plaster operations, and wallboard manufacturing.

The following table summarizes the source’s potential to emit (PTE) of each regulated air pollutant from all emission units addressed by this Part 70 Operating Permit.

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

Pollutant	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAPs <sup>1</sup>	H <sub>2</sub> S	Pb	GHG <sup>2</sup>
Tons/year	63.54	32.48	84.86	171.28	0.79	27.16	3.40	0	0	141,561

<sup>1</sup> A major source is defined as 10 tons for any individual HAP or 25 tons for combination of all HAPs.

<sup>2</sup> Metric tons per year of carbon dioxide equivalent. GHG = greenhouse gas pollutants.

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

This gypsum processing operation is subject to 40 CFR Part 60, Subparts OOO, IIII, UUU, and 40 CFR Part 63, Subparts CCCCC and ZZZZ. By meeting the requirements of 40 CFR Part 60, Subpart IIII, the source meets the requirements of 40 CFR Part 63, Subpart ZZZZ.

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## Common Acronyms and Abbreviations

(These terms may be seen in the permit)

<b>Acronym</b>	<b>Term</b>
AQR	Clark County Air Quality Regulation
ATC	Authority to Construct
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CD	control device
DAQ	Division of Air Quality
DES	Clark County Department of Environment and Sustainability
DOM	date of manufacture
dscf	dry standard cubic feet
dscm	dry standard cubic meter
EPA	U.S. Environmental Protection Agency
EU	emission unit
g/gr	gram
HAP	hazardous air pollutant
HOO	Hearing Officer Order
hp	horsepower
kW	kilowatts
MMBtu/hr	Millions of British Thermal Units per Hour
MSP	Minor Source Permit
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standard
NSR	New Source Review
OP	Operating Permit
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in diameter
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
PSD	Prevention of Significant Deterioration
PTE	potential to emit
SIP	State Implementation Plan
SIC	Standard Industrial Classification
SO <sub>2</sub>	sulfur dioxide
TDS	Total Dissolved Solids
U.S.C.	United States Code
VMT	vehicle miles traveled
VEE	Visible Emissions Evaluation
VOC	volatile organic compound

## 1.0 EQUIPMENT

### 1.1 EMISSION UNITS

The stationary source covered by this Part 70 Operating Permit (Part 70 OP) consists of the emission units and associated appurtenances summarized in Table 1-1. [AQR 12.4 ATC (06/23/2020) & AQR 12.5.2.3]

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

EU	Rating	EU Description	Controls	Manufacturer	Model No.	Serial No.
<b>Group 3A—Truck Unloading Station</b>						
C.16	2.5 miles	Paved Haul Road	Sweeping			
C.17	60 tons	Hoppers #1, #2	BH01			
C.18	3 acres	Gypsum Rock Storage Pile				
C.19		Conveyor System (4 Belts)	Moisture			
<b>Group 5—Discharge Terminal</b>						
E1		Stacker E.1	Moisture			
E.2		Conveyor System (5 Belts)	Moisture			
E.8.1		Silo #1	BV01			
E.8.2		Silo #2	BV02			
E.9		Conveyor System (2 Belts)	Moisture			
E.9.2		Emergency Hopper				
E.9.3		Silo #3	BV03			
E.11	37 MMBtu/hr	CP Mill	BH02	Maxon	140KDZERL E-NFS	18903163
E.12	55 ton/hr	Stucco Cooler	BH02			
<b>Group 6—Rolling Mills</b>						
F.1(a-e)	55 ton/hr	Rock Bin #1-5	BH04-BH08			
F.1.1	1.8 MMBtu/hr	Flash Dryer #1	BH04			
F.1.2	1.8 MMBtu/hr	Flash Dryer #2	BH05			
F.1.3	1.8 MMBtu/hr	Flash Dryer #3	BH06			
F.1.4	1.8 MMBtu/hr	Flash Dryer #4	BH07			
F.1.5	1.8 MMBtu/hr	Flash Dryer #5	BH08			
F.2(a-e)	55 ton/hr	Roller Mill #1-5	BH04-BH08			

EU	Rating	EU Description	Controls	Manufacturer	Model No.	Serial No.
F.3(a-e)		Collection Screw Conveyor	BH04-BH08			
F.4(a-e)		LP Collection Screw Conveyor	BH04-BH08			
F.6		LP Bin (400 tons)	BH09			
<b>Group 7—Plaster Production/Kettles</b>						
G.1	55 ton/hr	Bucket Elevator #1	BH09			
G.2		LP Distribution Screw Conveyor	BH09			
G.3(a-g)	55 ton/hr	LP Bins #1-7	BH09			
G.8.4a-g	87.5 ton/hr	Kettle Calciner#1-7	BH10-BH16			
G.8.4a(1)	12 MMBtu/hr	Kettle Calciner #1 (Burner)	None			
G.8.4b(2)	12 MMBtu/hr	Kettle Calciner #2 (Burner)	None			
G.8.4c(3)	12 MMBtu/hr	Kettle Calciner #3 (Burner)	None			
G.8.4d(4)	12 MMBtu/hr	Kettle Calciner #4 (Burner)	None			
G.8.4e(5)	12 MMBtu/hr	Kettle Calciner #5 (Burner)	None			
G.8.4f(6)	12 MMBtu/hr	Kettle Calciner #6 (Burner)	None			
G.8.4g(7)	12 MMBtu/hr	Kettle Calciner #7 (Burner)	None			
G.9(a-g)	87.5 ton/hr	Hot Pits #1-7	BH10-BH16			
G.10		Stucco Collection Screw Conveyor	BH17			
G.11	87.5 ton/hr	Bucket Elevator #2	BH17			
G.12		Stucco Distribution Screw Conveyor	BH17			
G.14	50 ton/hr	Truck Loading	BH17			
<b>Group 8—Plaster Operations</b>						
H.1		Hardwall Screw Conveyor	BH17			
H.2.1	50 ton/hr	Hardwall Bin System (Bins #6HR, #5HR)	BH17			
H.3.1		Screw Conveyor H.3.1	BH17			
H.4	20 ton/hr	Hopper	BH17			
H.6	20 ton/hr	Ball Mill	BH17			
H.7	20 ton/hr	Bucket Elevator #3	BH17			

EU	Rating	EU Description	Controls	Manufacturer	Model No.	Serial No.
H.8		Screw Conveyor	BH17			
H.9	20 ton/hr	Bin #3HF	BH17			
H2.2	20 ton/hr	Casting Bin System (Bins #1CR - 4CR)	BH17			
H.3.2		Screw Conveyor	BH17			
H.3.3		Screw Conveyor	BH17			
H.10.4	10 ton/hr	Entoleter	BH17			
H.10.5		Screw Conveyor	BH17			
H.10.6	10 ton/hr	Bucket Elevator #4	BH17			
H.10.7		Casting Screw Conveyor	BH17			
H.13		Screw Conveyor	BH17			
H.13.1		Air Classifier	BH17			
H.14.2		Screw Conveyor	BH17			
H.15	20 ton/hr	Bucket Elevator #5	BH17			
H.16		Finish Bin Feed Screw Conveyor System (2 Screw Conveyors)	BH17			
H.17		Finish Bin System (6 Bins)	BH17			
H.18		Mixer Feed Screw Conveyor System (5 Screw Conveyors)	BH17			
H.19.1		Mixer #3	BH18			
H.19.2		Bucket Elevator #6	BH18			
H.20.1		Sacker	BH18			
H.19.3		Mixer #5	BH19			
H.19.4		Bucket Elevator #7	BH19			
H.20.2		Sacker	BH19			
H.19.5		Bucket Elevator #8	BH17			
H.19.6		Mixer #6	BH20			
H.20.4		Supersacker	BH20			
H.21		Bulk Loading Bin	BH21			
H.20.3		Truck Loading	BH21			
H.22		Cement Bin	BV04			
<b>Group 9—Stucco Storage Bins</b>						
I.1		Stucco Screw Conveyor System (2 Screw Conveyors)	BH23			
I.2	55 ton/hr	Cooling Bins System (2 Bins)	BV05			



EU	Rating	EU Description	Controls	Manufacturer	Model No.	Serial No.
I.3		Stucco Screw Conveyor 3	BH23			
I.4	55 ton/hr	Bucket Elevator #9	BH23			
I.6	55 ton/hr	Stucco Storage Bin System (4 Bins)	BH23			
I.7		Stucco Screw Conveyor 4	BH23			
I.8	55 ton/hr	Surge Bin	BH23			
I.9		Stucco Screw Conveyor 5	BH23			
I.10		Metering Screw Conveyor	BH23			
I.11	55 ton/hr	Recirculation Elevator # 10	BH23			
I.13		Mixing Screw Conveyor	BH23			
I.14		Stucco Transfer	BH03			
<b>Group 10—Board Plant</b>						
J.1	50 ton/hr	Pin Mixer	BH23			
J.1.1	50 ton/hr	Edge Mixer	BH23			
J.2.1	1.2 MMBtu/hr	Paper Heater #1				
J.2.2	1.2 MMBtu/hr	Paper Heater #2				
J.3	141 MMBtu/hr	AKI Board Dryer				
J.3.1		Wallboard Raw Materials - Inks				
J.3.1.1		Wallboard Raw Materials - Silicone				
J.4		Radial Center Saw	BH24			
J.5		End Saws (4 Saws)	BH24			
J.6		Slutter Machine	BH24			
J.7		STMP Feed System	BH25			
<b>Group 11—Accelerator System</b>						
K.1	0.3 ton/hr	LP Bin w/Additive Bin	BV06			
K.2		Screw Conveyor K.2	BH22			
K.3	0.3 ton/hr	Bucket Elevator #11	BH22			

EU	Rating	EU Description	Controls	Manufacturer	Model No.	Serial No.
K.4		Screw Conveyor System (2 Screw Conveyors)	BH22			
K.6	0.3 ton/hr	Ball Mill System (8 Mills)	BH22			
K.7		Screw Conveyor	BH22			
K.8	0.3 ton/hr	Bucket Elevator #12	BH22			
K.9		Screw Conveyor System (2 Screw Conveyors)	BH22			
K.12	0.3 ton/hr	Accelerator Bin	BV06			
K.13		Mixing Screw Conveyor	BH22			
<b>Group 14—Wallboard Recycling System</b>						
L.1	15 acres	Recycle Stockpile				
L.10	1 acre	Finished Product Stockpile				
L.13	0.46 miles	Unpaved Haul Roads				
L.14		Recycle Stockpile Transfer	Moisture			
L.17	10 ton/hr	Recycle Feeder	Moisture			
L.20		Screw Conveyor	Moisture			
L.18	10 ton/hr	Bucket Elevator #13	Moisture			
N.1	100 ton/hr	Grinder	Moisture	Komptech	Crambo 6000	G2D00222
N.2		Conveyor	Moisture			
N.3	50 ton/hr	Screen	Moisture	Komptech	Nemus 2700	28054
N.4		Conveyor System (4 Belts)	Moisture			
<b>Engines</b>						
N.5	575 hp	Diesel Engine, DOM: 2017		Caterpillar	C18	WRH09907
N.6	95 hp	Diesel Engine, DOM: 2016		CAT/Perkins	C4.4/1104 D-44T	U262427A
N.7	65 hp	Diesel Engine, DOM: 2004		Cummins	B3.3	68027481
P.01	136 hp	Diesel Fire Pump, DOM: 2018		John Deere	4050HFC28	PE4045N01710 6
<b>Miscellaneous</b>						
T.1	1,000 gal	Gasoline Aboveground Storage Tank				

EU	Rating	EU Description	Controls	Manufacturer	Model No.	Serial No.
<b>Fugitives – Haul Roads/Stockpiles</b>						
C.16	2.5 miles	Paved Haul Road	Sweeping			
C.18	3 acres	Gypsum Rock Storage Pile				
L.1	15 acres	Recycle Stockpile				
L.10	1 acre	Finished Product Stockpile				
L.13	0.46 miles	Unpaved Haul Roads	Moisture			

Note: BH = baghouse; BV = bin vent; DOM = date of manufacture; MMBtu = millions of British thermal units.

## 1.2 INSIGNIFICANT ACTIVITIES

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

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

Description
Diesel dispensing operation (36,000 gallons per year)
1,500 diesel storage tank (15,000 gallons per year)

## 1.3 NONROAD ENGINES

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

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

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

## 2.0 CONTROLS

### 2.1 CONTROL DEVICES

- The permittee shall operate each baghouse at all times any affected emission unit is operating, as indicated in Table 2-1. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*

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

Control Device		Description	$\Delta P$ Range (in. H <sub>2</sub> O)	Corresponding Emission Unit
Number	Type			
BH01	Baghouse	Rock Unloading	0.5 – 8.0	C.17, C19
BH02	Baghouse	CP Mill	0.5 – 8.0	E.11, E.12
BH03	Baghouse	Stucco Cooler /Transfer	0.5 – 8.0	I.14
BH04	Baghouse	Roller Mill #1	0.5 – 8.0	F.1 through F.4
BH05	Baghouse	Roller Mill #2	0.5 – 8.0	
BH06	Baghouse	Roller Mill #3	0.5 – 8.0	
BH07	Baghouse	Roller Mill #4	0.5 – 8.0	
BH08	Baghouse	Roller Mill #5	0.5 – 8.0	
BH09	Baghouse	LP Bins	0.5 – 8.0	F.6,G.1, G.2, G.3
BH10	Baghouse	Kettle #1	0.5 – 8.0	G.8.4a(1), 4b(2), 4c(3), 4d(4), 4e(5), 4f(6), 4f(7)
BH11	Baghouse	Kettle #2	0.5 – 8.0	
BH12	Baghouse	Kettle #3	0.5 – 8.0	
BH13	Baghouse	Kettle #4	0.5 – 8.0	
BH14	Baghouse	Kettle #5	0.5 – 8.0	
BH15	Baghouse	Kettle #6	0.5 – 8.0	
BH16	Baghouse	Kettle #7	0.5 – 8.0	
BH17*	Baghouse	Finish Bin	1.0 – 9.0	G.9 through G.14; H.1 through H.18
BH18	Baghouse	Mixer #3	0.5 – 8.0	H.19.1, H.19.2
BH19	Baghouse	Mixer #5	0.5 – 8.0	H.19.3, H.19.4, H.20.2
BH20	Baghouse	Mixer #6	0.5 – 8.0	H.19.6, H.20.4
BH21	Baghouse	Bulk Plaster Loading	0.2 – 8.0	H.21, H.20.3
BH22	Baghouse	Accelerator Ball Mills	0.5 – 8.0	K.2 through K.9, K.13
BH23	Baghouse	Board Plant Stucco Bins	0.5 – 8.0	I.1, I.3 through I.13, J.1, J.1.1
BH24*	Baghouse	End Trim	0.2 – 5.0	J.4 through J.6
BH25	Baghouse	STMP Feed System	0.5 – 8.0	J.7 (Inside building)

\* CAM applicable.

Bin Vents

- The permittee shall operate the bin vents indicated in Table 2-2 at all times the processing equipment is operating for the specified corresponding equipment. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*

**Table 2-2: Summary of Bin Vents**

EU	Device	Name	Make	Model No.	Serial No.	Air Flow (scfm)
E.8.1	BV01	Rock Silo #1	CP Environmental	58BF025C	8289-2	500
E.8.2	BV02	Rock Silo #2	CP Environmental	58BF025IIG	3376-2	500
E.9.3	BV03	CP Mill Feed Silo	CP Environmental	58BF025C	8289-3	500
H.22	BV04	Cement Bin	CP Environmental	58BF025IIG	3419	500
I.2	BV05	Stucco Cooling Bins	CP Environmental	58BF016C	8293	300
K.1	BV06	LP Bins (Accelerator)	Pneu-Con	N/A	N/A	300

**2.2 CONTROL REQUIREMENTS**

Wallboard Manufacturing/Recycling

- The permittee shall control fugitive dust emissions from conveyors, storage piles, transfer points, drop points, stacker points, and nonmetallic mineral processing equipment not connected to baghouse controls or part of the wet process by operational water sprays as needed to prevent exceeding opacity standards. The permittee shall utilize the water spray system at all times during the processing of materials. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
- The permittee shall maintain the water spray system in good operating condition, as verified by a daily inspection when operating the equipment. The permittee shall investigate and correct any problems with the water spray system before resuming operations. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
- The permittee shall control fugitive dust emissions from conveyors, paved and unpaved haul roads (EU: C.16 and L.13), the useable gypsum rock storage pile (EU: C.18) and the storage piles (EUs: L.1 and L.10), transfer points, and nonmetallic mineral processing equipment not connected to baghouse controls by maintaining at least 0.5% moisture by weight in materials less than ¼ inch in diameter. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
- The Control Officer may at any time require additional watering systems at pertinent locations if an inspection indicates that the opacity limit(s) is being exceeded. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*

Gasoline Dispensing

- The permittee shall prevent fugitive VOC emissions from fuel dispensing activities by using the best available equipment, good operating practices, and dispensing spillage cleanup and mitigation practices. Minor fuel spillage shall not be allowed to accumulate during reparative fuel dispensing activities. The permittee shall train employees involved with fuel dispensing activities on techniques for minimizing fuel transfer spillage. *[40 CFR Part 63.1114]*

6. 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. Measures to be taken include, but are not limited to, the following: *[40 CFR Part 63.11116]*
  - a. Minimize gasoline spills;
  - b. Clean up spills as expeditiously as practicable;
  - c. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
  - d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators; and
  - e. Provide records documenting gasoline throughput within 24 hours of a request from the Control Officer.

#### Fuel Burning Equipment / Diesel Engines

7. The permittee shall combust only natural gas in the CP Mill (EU: E.11), flash dryers (EUs: F1.1, F.1.2, F.1.3, F.1.4 and F.1.4), paper heaters (EUs: J.2.1, J.2.2, and J.3), and kettle calciners (EUs: G8.1 through G.8.7). *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
8. The permittee shall equip diesel engines (EUs: N.5, N.6, N.7, and P.01) with turbochargers and aftercoolers, and shall operate and maintain the engines in accordance with the manufacturer's operations and maintenance manual. *[Title V OP (3/18/2015) & ATC (8/26/2016)]*
9. The permittee shall maintain and operate the CP mill with burners that have a manufacturer's maximum emission concentration of 40 parts per million (ppm) NO<sub>x</sub>, corrected to 3% oxygen (EU: E.11). *[Part 70 Operating Minor Revision Application (3/13/2023)]*
10. The permittee shall maintain and operate each CP mill with burners that have a manufacturer's maximum emission concentration of 150 ppm CO, corrected to 3% oxygen (EU: E.11). *[Part 70 Operating Minor Revision Application (3/13/2023)]*

#### Haul Roads/Stockpiles

11. The permittee shall take continual measures to control fugitive dust (e.g., wet, chemical, or organic suppression, enclosures) 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 an inspection indicates that opacity limits are being exceeded. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
12. The permittee shall not cause or allow fugitive dust to become airborne without taking reasonable precautions. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*

13. The permittee shall not cause or allow the discharge of fugitive dust more than 100 yards from either the point of origin or beyond the lot line of the property on which the emissions originate, whichever is less. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
14. The permittee shall sweep and/or rinse paved roads accessing or located on the site as necessary to remove all observable deposits and not exhibit an opacity greater than 20%, as determined by observations based on EPA Method 9, or an instantaneous opacity greater than 50%.
15. The permittee shall not exceed a silt loading of 0.33 ounces per square foot on paved roads accessing or located on the site, regardless of the average number of vehicles per day. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
16. The permittee shall ensure that all unpaved roads accessing or located on the site are treated with chemical or organic dust suppressant and are watered as necessary, or paved, or graveled, or use an alternate, Control Officer-approved control measure applied so as not to exhibit an opacity greater than 20% as determined by observations based on EPA Method 9 or an instantaneous opacity greater than 50%. In addition, depending on the control method chosen, silt content shall not exceed 6% or silt loading shall not exceed 0.33 ounces per square foot, regardless of the average number of vehicles per day. *[NSR ATC/OP 4, Modification 5, Revision 0, (07/23/07)]*
17. The permittee shall not allow mud or dirt to be tracked out onto a paved road where it extends 50 feet or more in cumulative length from the point of origin, nor shall any trackout be allowed to accumulate to a depth greater than 0.25 inches. All accumulations of mud or dirt on curbs, gutters, sidewalks, or paved roads, including trackout less than 50 feet in length and/or less than 0.25 inches in depth, shall be cleaned of all observable deposits and maintained to eliminate emissions of fugitive dust. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
18. The permittee shall ensure that all loaded trucks, regardless of ownership, are properly covered to prevent visible emissions. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*

### Baghouses

19. The permittee shall operate the baghouses indicated in Table 2-1 and at all times the processing equipment is operating for the specified corresponding equipment. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
20. The permittee shall ensure that the baghouses indicated in Table 2-1 have a particulate control efficiency of at least 99.5% on each baghouse, except for BH25. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
21. The permittee shall ensure that baghouse BH25 has a particulate control efficiency of at least 99 %. *[ATC (6/2/2021)]*
22. The permittee shall maintain each baghouse in good working order, so all are operated consistent with manufacturer specifications and the control standards of this permit. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07) & AQR 12.5.2.6(a)]*

23. The permittee shall operate each baghouse so the pressure drops stay within the limits specified in Table 2-1. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*

#### Bin Vents

24. The permittee shall ensure that each bin vent indicated in Table 2-2 has a particulate control efficiency of at least 99.5%. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
25. The permittee shall maintain each bin vent in good working order, so all are operated consistent with manufacturer specifications and the control standards of this permit. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07) & AQR 12.5.2.6(a)]*

#### Other

26. The permittee shall not cause, suffer, or allow any source to discharge air contaminants (or other materials) in quantities that will cause a nuisance, including excessive odors. *[AQR 40 & AQR 43]*
27. The permittee shall not cause or permit the handling, transporting, or storage of any material in a manner that allows or may allow controllable PM to become airborne. *[AQR 41.1.2]*



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### 3.0 LIMITATIONS AND STANDARDS

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#### 3.1 OPERATIONAL LIMITS

##### Wallboard Manufacturing/Recycling

1. The permittee shall limit the processing of usable gypsum rock and recycled reject wallboard to a combined total of 800,000 tons in any consecutive 12-month period. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
2. The permittee shall limit the processing of reject and/or recycled wallboard to a combined throughput of 120,000 tons in any consecutive 12-month period. *[AQR 12.4.3.2(b) & ATC (8/26/2016)]*
3. The permittee shall limit the processing of the STMP feed system to 131,400 tons in any consecutive 12-month period. *[NSR ATC/OP 4, Modification 5, Revision 0 (07/23/07)]*
4. The permittee shall limit the processing of gypsum rock at the truck unloading station to 800,000 tons in any consecutive 12-month period. *[Part 70 Operating Permit: Condition III-C-2(d) (6/2/2021)]*

##### Wallboard Raw Materials

5. The permittee shall limit the consumption of wallboard inks, etc., containing volatile organic compounds (VOCs) to 2,340 gallons in any consecutive 12-month period, based on a weighted average VOC content of 6.62 pounds per gallon. The permittee may alter the VOC content and usage in gallons to ensure the PTE for each pollutant is not exceeded (EU: J.3.1). *[Part 70 Operating Permit: Condition III-C-2(e) (6/2/2021)]*
6. The permittee shall limit the consumption of silicone in the wallboard manufacturing process to 950,000 pounds in any consecutive 12-month period (EU: J.3.1.1). *[Part 70 Operating Permit: Condition III-D-15 (5/3/2022)]*

##### Gasoline Dispensing

7. The permittee shall limit gasoline fuel dispensing to 16,000 gallons in any consecutive 12-month period (EU: T.1). *[NSR ATC 4, Modification 6, Revision 0, (05/29/08)]*

##### Diesel Engines / Emergency Fire Pump

8. The permittee shall limit the operation of each diesel engine to 2,400 hours in any consecutive 12-month period (EUs: N.5, N.6, and N.7). *[Title V OP (3/18/2015) & NSR ATC: Condition III-B-2(e)(8/26/2016)]*
9. The permittee shall limit the operation of the emergency fire pump (EU: P.01) for testing and maintenance purposes to 100 hours per year. The permittee may operate the emergency fire pump up to 50 hours per year for nonemergency situations, but those hours count towards the 100 hours provided for testing and maintenance. *[40 CFR Part 60.4211(e)]*

Haul Roads/Stockpiles

10. The permittee shall limit the total stockpile area (EUs: C.18, L.1, and L.10) to 19.0 acres at any given time. *[Part 70 Operating Permit: Condition III-C-2(i) (6/2/2021)]*
11. The permittee shall limit vehicle miles traveled (VMT) on unpaved roads (EU: L.13) to 2,562 miles in any consecutive 12-month period. *[Part 70 Operating Permit: Condition III-B-2(e) (1/25/2018)]*
12. The permittee shall limit VMT on paved roads (EU: C.16) to 43,478 miles in any consecutive 12-month period. *[Part 70 Operating Permit: Condition III-B-2(f) (1/25/2018)]*

**3.2 EMISSION LIMITS**

1. The permittee shall not allow the actual emissions from the following individual emission units or groups to exceed the PTE listed in Table 3-1 below in any consecutive 12-month period, except for emission units intended only for use in emergencies. *[AQR 12.5.2.6(a)]*

**Table 3-1: Emission Unit PTE (tons per year)**

Group	Process Description	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAPs
Group 3A	Truck Unloading	6.16	0.92	0.00	0.00	0.00	0.00	0.00
Group 5	Discharge Terminal	11.66	1.90	0.00	0.00	0.00	0.00	0.00
	CP Mill	8.54	8.54	7.88	17.97	0.10	0.88	0.31
Group 6	Rolling Mills	0.68	0.66	0.00	0.00	0.00	0.00	0.00
	Flash Dryers	0.30	0.30	3.85	3.25	0.05	0.2	0.05
Group 7	Plaster Production	0.72	0.49	0.00	0.00	0.00	0.00	0.00
	Kettles	2.73	2.73	36.05	30.31	0.21	1.96	0.70
Group 8	Plaster Operations	0.71	0.66	0.00	0.00	0.00	0.00	0.00
Group 9	Stucco Storage Bins	0.37	0.11	0.00	0.00	0.00	0.00	0.00
Group 10	Dryers, Heaters	4.71	4.71	29.45	115.35	0.39	3.39	1.19
	Raw Materials - Inks	0.00	0.00	0.00	0.00	0.00	7.75	0.00
	Raw Materials - Silicone	4.80	4.80	0.00	0.00	0.00	12.54	1.09
	Board Plant	3.51	3.49	0.00	0.00	0.00	0.00	0.00
Group 11	Accelerator System	0.10	0.10	0.00	0.00	0.00	0.00	0.00
Group 14	Wallboard Recycling System	8.21	1.23	0.00	0.00	0.00	0.00	0.00
Engines	Diesel Engine (575 hp) - Grinder	0.23	0.23	5.73	2.04	0.01	0.06	0.02
	Diesel Engine (65 hp)	0.05	0.05	0.96	0.64	0.01	0.19	0.01
	Diesel Engine (95 hp)	0.04	0.04	0.75	0.65	0.01	0.08	0.01
	Diesel Fire Pump (136 hp)	0.01	0.01	0.19	0.07	0.01	0.01	0.01
Miscellaneous	Gasoline Storage Tank	0.00	0.00	0.00	0.00	0.00	0.10	0.01
Fugitives	Hauls Roads/Stockpiles	10.01	1.51	0.00	0.00	0.00	0.00	0.00

2. Except as specified in Table 3-2, the permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20% opacity for more than six consecutive minutes. *[AQR 26.1]*
3. The permittee shall not allow the baghouses for the rock unloading process (BH01), the plaster operations (BH17), the bulk loading bin process (BH21), the accelerator system (BH22), and the stucco storage bins (BH23) to discharge emissions from their exhaust stack into the atmosphere that contain particulate matter (PM) above 0.05 g/dscm (0.022 gr/dscf). *[AQR 12.5.2.3 and 40 CFR 60.672]*
4. The permittee shall not allow the baghouse for the CP Mill (BH02) to discharge emissions from its exhaust stack into the atmosphere above the following limits: *[NSR ATC/OP 4, Modification 4, Revision 0 (08/08/05)]*
  - a. Total PM of 0.092 g/dscm (0.040 gr/dscf); *[40 CFR 60.732]*
  - b. PM<sub>10</sub> of 0.00873 gr/dscf at a rate of 1.95 lb/hr.
5. The permittee shall not allow visible emissions above the percent opacity listed in Table 3-2 for emission units and associated baghouses/bin vents. *[40 CFR Part 60, Subparts OOO and UUU & AQR 26.1]*

**Table 3-2: Emission Unit Opacity Summary**

EU	Rating	EU Description	Controls	Opacity
<b>Group 3A—Truck Unloading Station</b>				
C.17	60 ton	Hoppers #1, #2	BH01	7%
C.19		Conveyor System (4 Belts)	Moisture	10%
<b>Group 5—Discharge Terminal</b>				
E.1		Stacker	Moisture	20%
E.2		Conveyor System (5 Belts)	Moisture	20%
E.8.1		Silo #1	BV01	20%
E.8.2		Silo #2	BV02	20%
E.9		Conveyor System (2 Belts)	Moisture	20%
E.9.2		Emergency Hopper		20%
E.9.3		Silo #3	BV03	20%
E.11	37 MMBtu/hr	CP Mill	BH02	10%
E.12	55 ton/hr	Stucco Cooler	BH02	10%
<b>Group 6—Rolling Mills</b>				
F.1(a-e)	55 ton/hr	Rock Bin #1-5	BH04-BH08	20%
F.1.1	1.8 MMBtu/hr	Flash Dryer #1	BH04	20%
F.1.2	1.8 MMBtu/hr	Flash Dryer #2	BH05	20%
F.1.3	1.8 MMBtu/hr	Flash Dryer #3	BH06	20%
F.1.4	1.8 MMBtu/hr	Flash Dryer #4	BH07	20%
F.1.5	1.8 MMBtu/hr	Flash Dryer #5	BH08	20%
F.2(a-e)	55 ton/hr	Roller Mill #1-5	BH04-BH08	20%
F.3(a-e)		Collection Screw Conveyor	BH04-BH08	20%

EU	Rating	EU Description	Controls	Opacity
F.4(a-e)		LP Collection Screw Conveyor	BH04-BH08	20%
F.6		LP Bin (400 tons)	BH09	20%
<b>Group 7—Plaster Production/Kettles</b>				
G.1	55 ton/hr	Bucket Elevator #1	BH09	20%
G.2		LP Distribution Screw Conveyor	BH09	20%
G.3(a-g)	55 ton/hr	LP Bins #1-7	BH09	20%
G.8.4a-g	87.5 ton/hr	Kettle Calciner #1-7	BH10-BH16	20%
G.8.4a(1)	12 MMBtu/hr	Kettle Calciner #1 (Burner)	None	20%
G.8.4b(2)	12 MMBtu/hr	Kettle Calciner #2 (Burner)	None	20%
G.8.c(3)	12 MMBtu/hr	Kettle Calciner #3 (Burner)	None	20%
G.8.c(4)	12 MMBtu/hr	Kettle Calciner #4 (Burner)	None	20%
G.8.e(5)	12 MMBtu/hr	Kettle Calciner #5 (Burner)	None	20%
G.8.f(6)	12 MMBtu/hr	Kettle Calciner #6 (Burner)	None	20%
G.8.g(7)	12 MMBtu/hr	Kettle Calciner #7 (Burner)	None	20%
G.9(a-g)	87.5 ton/hr	Hot Pits #1-7	BH10-BH16	20%
G.10		Stucco Collection Screw Conveyor	BH17	7%
G.11	87.5 ton/hr	Bucket Elevator #2	BH17	7%
G.12		Stucco Distribution Screw Conveyor	BH17	7%
G.14	50 ton/hr	Truck Loading	BH17	7%
<b>Group 8—Plaster Operations</b>				
H.1		Hardwall Screw Conveyor	BH17	7%
H.2.1	50 ton/hr	Hardwall Bin System (Bins #6HR, #5HR)	BH17	7%
H.3.1		Screw Conveyor H.3.1	BH17	7%
H.4	20 ton/hr	Hopper	BH17	7%
H.6	20 ton/hr	Ball Mill	BH17	7%
H.7	20 ton/hr	Bucket Elevator #3	BH17	7%
H.8		Screw Conveyor	BH17	7%
H.9	20 ton/hr	Bin #3HF	BH17	7%
H2.2	20 ton/hr	Casting Bin System (Bins #1CR - 4CR)	BH17	7%
H.3.2		Screw Conveyor	BH17	7%
H.3.3		Screw Conveyor	BH17	7%
H.10.4	10 ton/hr	Entoleter	BH17	7%
H.10.5		Screw Conveyor	BH17	7%
H.10.6	10 ton/hr	Bucket Elevator #4	BH17	7%
H.10.7		Casting Screw Conveyor	BH17	7%
H.13		Screw Conveyor	BH17	7%
H.13.1		Air Classifier	BH17	7%
H.14.2		Screw Conveyor	BH17	7%
H.15	20 ton/hr	Bucket Elevator #5	BH17	7%

EU	Rating	EU Description	Controls	Opacity
H.16		Finish Bin Feed Screw Conveyor System (2 Screw Conveyors)	BH17	7%
H.17		Finish Bin System (6 Bins)	BH17	7%
H.18		Mixer Feed Screw Conveyor System (5 Screw Conveyors)	BH17	7%
H.19.1		Mixer #3	BH18	20%
H.19.2		Bucket Elevator #6	BH18	20%
H.20.1		Sacker	BH18	20%
H.19.3		Mixer #5	BH19	20%
H.19.4		Bucket Elevator #7	BH19	20%
H.20.2		Sacker	BH19	20%
H.19.5		Bucket Elevator #8	BH17	7%
H.19.6		Mixer #6	BH20	20%
H.20.4		Supersacker	BH20	20%
H.21		Bulk Loading Bin	BH21	7%
H.20.3		Truck Loading	BH21	7%
H.22		Cement Bin	BV04	20%
<b>Group 9—Stucco Storage Bins</b>				
I.1		Stucco Screw Conveyor System (2 Screw Conveyors)	BH23	7%
I.2	55 ton/hr	Cooling Bins System (2 Bins)	BV05	20%
I.3		Stucco Screw Conveyor 3	BH23	7%
I.4	55 ton/hr	Bucket Elevator #9	BH23	7%
I.6	55 ton/hr	Stucco Storage Bin System (4 Bins)	BH23	7%
I.7		Stucco Screw Conveyor 4	BH23	7%
I.8	55 ton/hr	Surge Bin	BH23	7%
I.9		Stucco Screw Conveyor 5	BH23	7%
I.10		Metering Screw Conveyor	BH23	7%
I.11	55 ton/hr	Recirculation Elevator #10	BH23	7%
I.13		Mixing Screw Conveyor	BH23	7%
I.14		Stucco Transfer	BH03	20%
<b>Group 10—Board Plant</b>				
J.1	50 ton/hr	Pin Mixer	BH23	7%
J.1.1	50 ton/hr	Edge Mixer	BH23	7%
J.2.1	1.2 MMBtu/hr	Paper Heater #1		20%
J.2.2	1.2 MMBtu/hr	Paper Heater #2		20%
J.3	141 MMBtu/hr	AKI Board Dryer		20%
J.3.1		Wallboard Raw Materials (Inks)		20%
J.3.1.1		Wallboard Raw Materials (Silicone)		20%

EU	Rating	EU Description	Controls	Opacity
J.4		Radial Center Saw	BH24	20%
J.5		End Saws (4 Saws)	BH24	20%
J.6		Slutter Machine	BH24	20%
J.7		STMP Feed System	BH25	20% (Inside Building)
<b>Group 11—Accelerator System</b>				
K.1	0.3 ton/hr	LP Bin w/ Additive Bin	BV06	20%
K.2		Screw Conveyor K.2	BH22	7%
K.3	0.3 ton/hr	Bucket Elevator #11	BH22	7%
K.4		Screw Conveyor System (2 Screw Conveyors)	BH22	7%
K.6	0.3 ton/hr	Ball Mill System (8 Mills)	BH22	7%
K.7		Screw Conveyor	BH22	7%
K.8	0.3 ton/hr	Bucket Elevator #12	BH22	7%
K.9		Screw Conveyor System (2 Screw Conveyors)	BH22	7%
K.12	0.3 ton/hr	Accelerator Bin	BV06	20%
K.13		Mixing Screw Conveyor	BH22	7%
<b>Group 14—Wallboard Recycling System</b>				
L.14		Recycle Stockpile Transfer	Moisture	10%
L.17	10 ton/hr	Recycle Feeder	Moisture	10%
L.20		Screw Conveyor	Moisture	10%
L.18	10 ton/hr	Bucket Elevator #13	Moisture	10%
N.1	100 ton/hr	Grinder	Moisture	12%
N.2		Conveyor	Moisture	10%
N.3	50 ton/hr	Screen	Moisture	10%
N.4		Conveyor System (4 Belts)	Moisture	10%
<b>Fugitives - Haul Roads/Stockpiles</b>				
C.16	2.5 miles	Paved Haul Road	Sweeping	20%
C.18	3 acres	Gypsum Rock Storage Pile		20%
L.1	15 acres	Recycle Stockpile		20%
L.10	1 acre	Finished Product Stockpile		20%
L.13	0.46 miles	Unpaved Haul Roads	Moisture	20%

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## 4.0 COMPLIANCE DEMONSTRATION REQUIREMENTS

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### 4.1 MONITORING

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

1. The Responsible Official shall sign and adhere to the *Visible Emissions Check Guidebook* and keep a copy of the signed guide on-site at all times.
2. The permittee shall conduct daily visual check for visible emissions on each emission unit and PM control device (e.g., baghouses and bin vents) while in operation. [AQR 12.5.2.6(d)]
3. The permittee shall conduct a visual emissions check on each diesel-fired emergency engine (EUs: N.5-N.7 and P.01) while in operation. [AQR 12.5.2.6(d)]
4. If no plume appears to exceed the opacity standard during the visible emissions check, the date, location, and results shall be recorded, along with the viewer's name.
5. If a plume appears to exceed the opacity standard, the permittee shall do one of the following:
  - a. Immediately correct the perceived exceedance, then record the first and last name of the person who performed the emissions check, the date the check was performed, the unit(s) observed, and the results of the observation; or
  - b. Call a certified Visible Emissions Evaluation (VEE) reader to perform a U.S. Environmental Protection Agency (EPA) Method 9 evaluation.
    - i. For sources required to have a certified reader on-site, the reader shall start Method 9 observations within 15 minutes of the initial observation. For all other sources, the reader shall start Method 9 observations within 30 minutes of the initial observation.
    - ii. If no opacity exceedance is observed, the certified VEE reader shall record the first and last name of the person who performed the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each emission unit that was initially perceived to have exceeded the opacity limit, and the record shall also indicate:
      - (1) The cause of the perceived exceedance;
      - (2) The color of the emissions; and
      - (3) Whether the emissions were light or heavy.
    - iii. If an opacity exceedance is observed, the certified VEE reader shall take immediate action to correct the exceedance. The reader shall then record the first and last name of the person performing the VEE, the date the VEE was performed, the unit(s) evaluated, and the results. A Method 9 VEE form shall be completed for each reading identified, and the record shall also indicate:

- (1) The cause of the exceedance;
  - (2) The color of the emissions;
  - (3) Whether the emissions were light or heavy;
  - (4) The duration of the emissions; and
  - (5) The corrective actions taken to resolve the exceedance.
6. Any scenario of visible emissions noncompliance can and may lead to enforcement action.
  7. Visible emissions checks do not require a certified observer unless the visible emissions appear to exceed the allowable opacity limit and to last more than 30 seconds, but an EPA Method 9 observation establishes that the emissions do not in fact exceed the standard. *[AQR 12.5.2.6(d)]*
  8. The permittee shall determine compliance with the opacity limits for unpaved haul roads when required by the Control Officer in accordance with one of the following, as applicable: *[AQR 12.5.2.6(d)]*
    - a. 40 CFR Part 60, Appendix A-4 (Method 9); or
    - b. The test method set forth in AQR 94.12.4, “Instantaneous Method.”
  9. The permittee shall conduct a visual emissions check at least quarterly on the fire pump while in operation. *[AQR 12.5.2.6(d)]*

#### Wallboard Manufacturing/Recycling

10. The permittee shall monitor the processing of usable gypsum rock in tonnage and calculate, on a monthly basis, the throughput as a consecutive 12-month total. *[AQR 12.5.2.6(d)]*
11. The permittee shall monitor the processing of reject and/or recycled wallboard in tonnage and calculate, on a monthly basis, the throughput as a consecutive 12-month total. *[AQR 12.5.2.6(d)]*
12. The permittee shall monitor the processing of material at the STMP feed system in tonnage and calculate, on a monthly basis, the throughput as a consecutive 12-month total. *[AQR 12.5.2.6(d)]*
13. The permittee shall monitor the processing of gypsum rock at the truck unloading station in tonnage and calculate, on a monthly basis, the throughput as a consecutive 12-month total. *[AQR 12.5.2.6(d)]*

#### Wallboard Raw Materials

14. The permittee shall monitor the consumption of each VOC-containing compound (e.g., wallboard inks) in gallons as a consecutive 12-month total (EU: J.3.1). *[AQR 12.5.2.6(d)]*
15. The permittee shall monitor the consumption of silicone in pounds as a consecutive 12-month total (EU: J.3.1.1). *[Part 70 Operating Permit: Condition III-D(15) (5/3/2022)]*



### Gasoline Dispensing

16. The permittee shall monitor the throughput of gasoline (EU: T.1) in gallons and calculate, on a monthly basis, the throughput as a consecutive 12-month total. [AQR 12.5.2.6(d)]
17. The permittee shall monitor the fuel storage and dispensing system to determine if components of the system are in compliance with the control requirements of this permit. This monitoring shall consist of, but not be limited to: [AQR 12.5.2.6(d)]
  - a. Daily inspection for gasoline spills. The permittee shall record the times and dates the source became aware of a spill and when the spill was cleaned up.
  - b. Inspection of covers on gasoline containers and fill pipes after each delivery. The permittee shall record the date of fuel deliveries and corresponding inspections.
  - c. Records of the date and approximate volume of gasoline sent to open waste collection systems that collect recyclable gasoline.

### Diesel Engines / Emergency Fire Pump

18. The permittee shall operate the diesel engines and fire pump (EUs: N.5, N.6, N.7, and P.01) with nonresettable hour meters. [AQR 12.5.2.6(d)]
19. The permittee shall monitor the hours of operation of each diesel engine (EUs: N.5, N.6, and N.7) and calculate, on a monthly basis, their duration of operation as a consecutive 12-month total. [AQR 12.5.2.6(d)]
20. The permittee shall monitor the hours of operation of the fire pump (EU: P.01) for testing and maintenance, and separately for emergencies. The nature of the emergency leading to emergency operation shall be documented. [AQR 12.5.2.6(d)]

### Moisture Sampling

21. The permittee shall demonstrate compliance with the minimum moisture content specified in this permit for materials less than ¼ inch in diameter by conducting moisture testing as follows: [AQR 12.5.2.6(d)]
  - a. Moisture testing shall be conducted at least once during each week of operation on material from each applicable area.
  - b. Moisture testing shall be conducted on materials less than ¼ inch in diameter. Samples for testing from the following areas shall be taken to be representative:
    - i. Group 5 discharge terminal at the fold belt/crossover belt area (EU: E.2), and
    - ii. Group 14 wallboard recycling system at the grinder area (EUs: N.1 or N.2).
  - c. Moisture testing shall be conducted in accordance with ASTM Standard C 566-97, “Standard Test Method for Total Moisture Content of Aggregate by Drying.”

### Haul Roads/Stockpiles

22. The permittee shall monitor daily the number of VMT on unpaved haul roads (EU: L.13) on-site by haul trucks entering and leaving, and calculate, on a monthly basis, the VMT as a consecutive 12-month total. [AQR 12.5.2.6(d)]
23. The permittee shall monitor daily the number of VMT on paved haul roads (EU: C.16) on-site by haul trucks entering and leaving, and calculate, on a monthly basis, the VMT as a consecutive 12-month total. [AQR 12.5.2.6(d)]
24. The permittee shall monitor the total stockpile areas (EUs: C.18, L.1, and L.10). [AQR 12.5.2.6(d)]
25. When required by the Control Officer, the permittee shall determine compliance with the silt content limits for unpaved haul roads in accordance with the test method set forth in AQR 91.4.1.2. [AQR 12.5.2.6(d)]
26. When required by the Control Officer, the permittee shall determine compliance with the silt loading limits for unpaved haul roads in accordance with the test method set forth in AQR 93.4.1.2. [AQR 12.5.2.6(d)]
27. For the purposes of this permit, the permittee shall determine whether an area is disturbed in accordance with the drop ball test set forth in AQR 90.4.1.1. [AQR 12.5.2.6(d)]

### Baghouses

28. The permittee shall conduct daily monitoring of the pressure drop across each baghouse cell, while in operation, with the installation and operation of a pressure differential (Magnehelic) gauge per manufacturer's specifications identified in this permit. [AQR 12.5.2.6(d)]
29. The permittee shall maintain a manual of standard operating procedures for baghouses. The procedures for maintenance specified in the manual shall, at a minimum, include a preventative maintenance schedule and type of bags guaranteed to maintain the filter efficiency in this permit that is consistent with the baghouse manufacturer's instructions for routine and long-term maintenance, and have it available for inspection. [AQR 12.5.2.6(d)]
30. The permittee shall conduct daily visual observations of baghouse and/or stack discharges to verify that visible emissions are not present in excess of allowable opacity limits. If they are, the permittee shall cease all operations producing emissions until the problem is corrected. [AQR 12.5.2.6(d)]
31. The permittee shall conduct the following monthly external inspections of each baghouse while it is running to ensure that the equipment is maintained in good working order and operated according to manufacturer's specifications: [AQR 12.5.2.6(d)]
  - a. Verification of the pulse timing sequence;
  - b. Verification that the cleaning system is not of an unusual appearance, and fans are running, and not exhibiting unusual sounds or vibrations; and

- c. Verification that seams, connections, and housings are sealed and leak-free, including walls, hoppers, ducting, and piping.
  - d. If an inspection shows that maintenance is necessary, the permittee shall schedule and complete such maintenance within five working days. If the malfunction renders the baghouse ineffective in controlling particulate emissions, the processing of material shall cease until repairs to the baghouse are completed.
32. The permittee shall visually inspect each baghouse interior at least annually for internal mechanical integrity of the unit and for any defects. Defective compartments shall be sealed off and repairs completed within five working days. If the malfunction renders the baghouse ineffective in controlling particulate emissions, the processing of material shall cease until repairs to the baghouse are completed. *[AQR 12.5.2.6(d)]*

### Bin Vents

33. The permittee shall conduct daily visual observations of the bin vent(s)/dust collector(s), while operating, to verify that visible emissions are not present in excess of allowable opacity limits. If they are, the permittee shall cease all operations producing the emissions until the problem is corrected. *[AQR 12.5.2.6(d)]*
34. The permittee shall conduct the following monthly external inspections of each bin vent/duct collector while it is running to ensure that the equipment is maintained in good working order and operated according to manufacturer's specifications: *[AQR 12.5.2.6(d)]*
- a. Verification of the pulse timing sequence;
  - b. Verification that the cleaning system is not of an unusual appearance, and fans are running, and not exhibiting unusual sounds or vibrations; and
  - c. Verification that seams, connections, and housings are sealed and leak-free, including walls, hoppers, ducting, and piping.
  - d. If an inspection shows that maintenance is necessary, the permittee shall schedule and complete such maintenance within five working days. If the malfunction renders the baghouse ineffective in controlling particulate emissions, the processing of material shall cease until repairs to the baghouse are completed.
35. The permittee shall visually inspect each bin vent/duct collector interior at least annually for internal mechanical integrity of the unit and for any defects. Defective compartments shall be sealed off and repairs completed within five working days. If the malfunction renders the baghouse ineffective in controlling particulate emissions, the processing of material shall cease until repairs to the baghouse are completed. *[AQR 12.5.2.6(d)]*
36. The permittee shall develop, follow, and maintain a preventative maintenance schedule that is consistent with the manufacturer's specifications for routine and long-term maintenance, and have it available for inspection. *[AQR 12.5.2.6(d)]*

Compliance Assurance Monitoring (CAM)

37. The permittee shall monitor the baghouses listed in Table 4-1 in accordance with 40 CFR Part 64 and the following conditions: *[40 CFR Part 64 & AQR 12.5.2.6(d)]*

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

EU ID	Description	Control Device	PM <sub>10</sub> Pre-Control Emissions
H.6, H.10.4	Plaster Ball Mill	BH17	161.6 tons/year
J.4, J.5, J.6	End Trim Saw, Center Saws, Slutter Machine	BH24	693.9 tons/year

- a. The permittee shall monitor the opacity of the exhaust from the baghouses listed in Table 4-1 daily.
- b. Daily measurements of the pressure differential between the inlet and outlet of the baghouse ( $\Delta p$ ) for PM<sub>10</sub> and visible emissions for opacity were selected as CAM indicators. For opacity readings, the absence of visible emissions demonstrates compliance. The key elements of the monitoring approach are presented in Table 4-2.
- c. The permittee shall monitor the pressure differential in baghouses subject to CAM in accordance with the monitoring requirements listed in Table 4-2.
- d. The permittee shall monitor opacity from baghouses subject to CAM in accordance with the monitoring requirements listed in Table 4-2.
- e. The owner or operator shall maintain a written QIP, if required, and have it available for inspection. The plan initially shall include procedures for evaluating the control performance problems and based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate: *[40 CFR Part 64.8(b)(1-2)]*
  - i. Improved preventive maintenance practice;
  - ii. Process operation changes;
  - iii. Appropriate improvements to control methods;
  - iv. Other steps appropriate to correct control performance; and
  - v. More frequent or improved monitoring.
- f. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined. *[40 CFR Part 64.8(c)]*
- g. Following implementation of a QIP, upon any subsequent determination pursuant to §64.7(d)(2) the Administrator or the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have: *[40 CFR Part 64.8(d)]*

- i. Failed to address the cause of the control device performance problems; or
  - ii. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- h. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. [40 CFR Part 64.8(e)]

**Table 4-2: Monitoring Approach**

CAM Element	Indicator 1	Indicator 2
Indicator	Pressure differential ( $\Delta p$ ) for PM <sub>10</sub> across baghouses BH17 and BH24.	Visible emissions for opacity.
Measurement Approach	Daily $\Delta p$ shall be measured across the baghouse with a Magnehelic gauge or equivalent; the time of reading and measured value will be recorded.	Daily visual observations of baghouse stack discharges shall be made to verify that visible emissions are not present. If visible emissions are observed, a Method 9 opacity reading will be performed.
Indicator Range	BH:17 - The indicator range for $\Delta p$ is 2–8 inches of water for EUs: H.6 and H.10.4. An excursion is defined as any measured $\Delta p$ outside the range of 2–8 inches of water.  BH:24 - The indicator range for $\Delta p$ is 1.2–4 inches of water for EUs: J.4, J.5, and J.6. An excursion is defined as any measured $\Delta p$ outside the range of 1.2 and 4 inches of water.  Excursions trigger an investigation, corrective actions, and a reporting requirement.	For opacity, the indicator is no visible emissions.  An excursion is defined as any visible emission observation.  Excursions trigger an investigation, corrective actions, and a reporting requirement.
Quality Improvement Plan Threshold	More than three excursions within a semiannual reporting period.	More than six excursions within a semiannual reporting period.
Performance Criteria Data Representativeness	Measurements shall be performed at the baghouse exhaust while the baghouse is operating.	Measurements shall be performed at the baghouse exhaust while the baghouse is operating.
Verification of Operational Status	The $\Delta p$ Magnehelic gauge or equivalent shall be installed, calibrated, and operated per manufacturer's recommendations.	Not applicable.
QA/QC Practices and Criteria	The Magnehelic gauge or equivalent shall be calibrated no less than annually.	The visible opacity observations shall be made by a certified observer.
Monitoring Frequency	Daily $\Delta p$ measures shall be made.	Daily 6-minute observations will be made

CAM Element	Indicator 1	Indicator 2
Data Collection Procedures	Differential pressure ( $\Delta p$ ) will be measured with a Magnehelic pressure gauge or equivalent device and recorded daily.	Visual checks shall comprise two observations about 15 seconds apart. Visual checks shall be recorded upon observation.
Averaging Period	Not applicable.	Not applicable.

## 4.2 TESTING

- At the Control Officer's request, the permittee shall test (or have tests performed) to determine emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of those allowed by the AQRs is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice. The Control Officer may observe the testing. All tests shall be conducted by reputable, qualified personnel. [AQR 4.2]
- At the Control Officer's request, the permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. [AQR 4.2]
- The permittee shall submit to the Control Officer for approval a performance testing protocol that contains testing, reporting, and notification schedules, test protocols, and anticipated test dates no less than 45 days, but no more than 90 days, before the anticipated date of the performance test unless otherwise specified in this permit. [AQR 12.5.2.8]
- 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)]
- Performance testing is subject to 40 CFR Part 60.8 (as amended), Subpart A, and *Clark County Department of Air Quality Guideline for Source Testing (9/19/2019)*. Performance testing shall be the instrument for determining initial and subsequent compliance with the emission limitations set forth in Table 4-3 this permit. [AQR 12.5.2.8(a)]

**Table 4-3: Performance Testing Requirements**

EU	Description	NSPS/AQR Applicability	Pollutant	Compliance Standard	Performance Test Method	Subsequent Testing Frequency
C.17, C.19	Baghouse: BH01 Gypsum Handling, Rock Unloading  Hoppers #1 and #2, Rock Unloading Hopper Discharge  Belts #1 and #2	40 CFR 60, Subpart 000	PM	0.05 g/dscm (0.022 gr/dscf)	Method 5 or Method 17	Every 5 years

EU	Description	NSPS/AQR Applicability	Pollutant	Compliance Standard	Performance Test Method	Subsequent Testing Frequency
E.11, E.12	Baghouse: BH02 CP Mill	40 CFR 60, Subpart UUU  AQR 12	PM  PM <sub>10</sub>	0.092 g/dscm (0.040 gr/dscf)  0.00873 gr/dscf	Method 5 or Method 17  Method 201 or Method 202	Every 5 years
G.10, G.11, G.12, G.14, H.1, H.2.1, H.2.2, H.3.1– H.3.3, H.4, H.6–H.9, H.10.4– H.10.7, H.13, H.13.1, H.14.2, H.15–H.18, H.19.5	Baghouse: BH17 Finish Bins	40 CFR 60, Subpart OOO	PM	0.05 g/dscm (0.022 gr/dscf)	Method 5 or Method 17	Every 5 years
H.20.3, H.21	Baghouse: BH21 Bulk Plaster Loading	40 CFR 60, Subpart OOO	PM	0.05 g/dscm (0.022 gr/dscf)	Method 5 or Method 17	Every 5 years
I.1, I.3, I.4, I.6–I.11, I.13, J.1, J.1.1	Baghouse: BH23 Board Plant Stucco Bins	40 CFR 60, Subpart OOO	PM	0.05 g/dscm (0.022 gr/dscf)	Method 5 or Method 17	Every 5 years
K.2–K.4, K.6–K.9, K.13	Baghouse: BH22 Accelerator Ball Mill	40 CFR 60, Subpart OOO	PM	0.05 g/dscm (0.022 gr/dscf)	Method 5 or Method 17	Every 5 years

6. The Control Officer will consider approving the permittee's request for alternative performance test methods if proposed in writing in the performance test protocols. *AQR 12.5.2.8(a)*
7. 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 (a)]*
8. The permittee of any stationary source that fails to demonstrate compliance with emissions standards or limitations during any performance test shall submit a compliance plan to the Control Officer within 90 days of the end of the performance test. *[AQR 12.5.2.8(a)]*
9. The Control Officer may require additional performance testing when operating conditions appear inadequate to demonstrate compliance with the emissions and/or limitations in this permit. *[AQR 4.5]*

### 4.3 RECORDKEEPING

1. The permittee shall keep records of all inspections, maintenance, and repairs, as required by this permit. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

2. The permittee shall comply with all applicable recordkeeping requirements of 40 CFR Part 60, Subparts OOO, IIII, UUU, and 40 CFR Part 63, Subparts CCCCCC and ZZZZ, and any other applicable regulations.
3. All records, logs, etc., or copies thereof, shall be kept on-site for a minimum of five years from the date the measurement, or data was entered. [AQR 12.5.2.6(d) and AQR 12.5.2.8]
4. Records and data required by this permit to be maintained by the permittee may be audited at any time by a third party selected by the Control Officer. [AQR 4.1]

#### 4.3.1 Records and Data

1. At a minimum, the permittee shall create and maintain the records identified in Section 4.3.1, all of which must be producible on-site to the Control Officer's authorized representative upon request and without prior notice during the permittee's hours of operation. [AQR 12.5.2.6(d) and AQR 12.5.2.8]
2. The permittee shall maintain the following records for reporting: [AQR 12.5.2.6(d) and AQR 12.5.2.8]

#### Process Operations

- a. Monthly, consecutive 12-month total quantity of usable gypsum rock processed (reported semiannually);
- b. Monthly, consecutive 12-month total quantity of reject/recycled gypsum wallboard processed (reported semiannually);
- c. Monthly, consecutive 12-month total quantity processed at the STMP feed system (reported semiannually);
- d. Monthly, consecutive 12-month total quantity of gypsum rock processed at the truck unloading system (reported semiannually);

#### Wallboard Raw Materials

- e. Total monthly consumption (in gallons) of each VOC-containing compound (wallboard inks) (reported semiannually);
- f. Total monthly consumption (in pounds) of silicone (reported semiannually);

#### Gasoline Dispensing

- g. Monthly, consecutive 12-month total throughput of the gasoline storage tank (reported semiannually);

#### Diesel Powered Generators/Fire Pump

- h. Monthly, consecutive 12-month total hours of operation of the continuous duty diesel engines (EUs: N.5, N.6, and N.7) (reported semiannually);



- i. Date and duration of operation of the diesel-powered fire pump (EU P.01) for testing, maintenance, and nonemergency use;
- j. Date and duration of operation of the diesel-powered fire pump (EU P.01) for emergency use, including documentation justifying use during the emergency;

### Haul Roads/Stockpiles

- k. Monthly, consecutive 12-month total VMT for on-site paved and unpaved haul roads (EUs: C.16 and L.13) (reported semiannually);
- l. Length of on-site paved and unpaved haul roads;
- m. Total area occupied by stockpiles (EUs: C.18, L.1, and L.10) (reported semiannually);

### CAM

- n. Excursions from the CAM (reported semiannually);
- o. If required, QIP (reported semiannually);

### Deviations

- p. Deviations from permit requirements that result in excess emissions (reported as required in Section 4.4 of this OP); and
- q. Deviations from permit requirements that do not result in excess emissions (reported semiannually).

### Other

- r. Deviations from permit requirements resulting in excess emissions (report as required by Section 4.4); and
  - s. Deviations from permit requirements not resulting in excess emissions (report semiannually).
2. The permittee shall maintain the following records: *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
- a. Logs of oil and filter changes and hose and belt inspections, as applicable (EU: N.7);
  - b. Log of control device inspections, maintenance, and repair;
  - c. Log of daily pressure drop across each baghouse cell;
  - d. Results of daily visible emission observations of operations;
  - e. Results of daily visual observations of baghouses;
  - f. Results of weekly moisture sampling;

- g. Log of dust control measures applied to paved haul roads, unpaved haul roads, and storage piles;
- h. Specifications sheets for emission units subject to manufacturer recommendations;
- i. Safety Data Sheet records of all VOC-containing materials used in the manufacture of wallboard;
- j. Results of performance testing; and
- k. Records of location changes for nonroad engines, if applicable.

#### **4.4 REPORTING AND NOTIFICATIONS**

1. The permittee shall certify compliance with the terms and conditions contained in this Part 70 OP, including emission limitations, standards, work practices, and the means for monitoring such compliance. *[AQR 12.5.2.8(e)]*
2. The permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W. Russell Road, Suite 200, Las Vegas, NV 89118) and the Region 9 Administrator (Director, Air and Radiation Divisions, 75 Hawthorne St., San Francisco, CA 94105). A compliance certification for each calendar year will be due on January 30 of the following year, and shall include the following: *[AQR 12.5.2.8(e)]*
  - a. The identification of each term or condition of the permit that is the basis of the certification;
  - b. The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period. These methods and means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements described in 40 CFR Part 70.6(a)(3). If necessary, the permittee shall also identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the Clean Air Act, which prohibits knowingly making a false certification or omitting material information; and
  - c. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means designated in (b) above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify, as possible exceptions to compliance, any periods during which compliance was required and in which an excursion or exceedance, as defined under 40 CFR Part 64, occurred.
3. The permittee shall report to the Control Officer any startup, shutdown, malfunction, emergency, or deviation that causes emissions of regulated air pollutants in excess of any limits set by regulations or this permit. The report shall be in two parts, as specified below: *[AQR 12.5.2.6(d)(4)(B); AQR 25.6.1]*

- a. Within 24 hours of the time the permittee learns of the excess emissions, the permittee shall notify DAQ by phone at (702) 455-5942, by fax at (702) 383-9994, or by email at [airquality@clarkcountynv.gov](mailto:airquality@clarkcountynv.gov).
  - b. Within 72 hours of the notification required by paragraph (a) above, the permittee shall submit a detailed written report to DAQ containing the information required by AQR 25.6.3.
4. 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)]*
  5. 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]*
  6. 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)]*
  7. 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)]*
  8. 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)]*
  9. At the Control Officer's request, the permittee shall provide any information or analyses that will disclose the nature, extent, quantity, or degree of air contaminants that are or may be discharged by the source, and the type or nature of control equipment in use. The Control Officer may require such disclosures be certified by a professional engineer registered in the state. In addition to this report, the Control Officer may designate an authorized agent to make an independent study and report on the nature, extent, quantity, or degree of any air contaminants that are or may be discharged from the source. An agent so designated may examine any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.1]*
  10. The permittee shall submit annual emissions inventory reports based on the following: *[AQR 18.6.1 and AQR 12.5.2.4]*

- a. The annual emissions inventory must be submitted to DAQ by March 31 of each calendar year (if March 31 falls on a Nevada or federal holiday, or on any day the office is not normally open for business, 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).
11. Stationary sources that emit 25 tons or more of nitrogen oxide (NOX) and/or emit 25 tons or more of volatile organic compounds (VOC) from their emission units, insignificant activities, and exempt activities during a calendar year shall submit an annual emissions statement for both pollutants. Emissions statements must include actual annual NOX and VOC emissions from all activities, including emission units, insignificant activities and exempt activities. Emissions statements are separate from, and additional to, the calculated annual emissions reported each year for all regulated air pollutants (aka Emissions Inventory). *[AQR 12.9.1]*
  12. The permittee shall submit to the Control Officer, within 15 days after commencing operation, any outstanding identification and/or description that was not previously available for new emission unit(s), as noted in this permit with "TBD." (Use this condition if there is emission unit information in the permit that is incomplete and noted with "TBD.")
  13. The permittee shall comply with all applicable notification and reporting requirements of 40 CFR Part 60, Subparts OOO, IIII, UUU, and 40 CFR Part 63, Subparts CCCCCC and ZZZZ. *[AQR 12.5.2.6(d)]*
  14. The permittee shall submit semiannual monitoring reports to DAQ. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
  15. The following requirements apply to semiannual reports: *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*
    - a. The report shall include item listed in Section 4.3.1.
    - b. The report shall be based on a calendar semiannual period, which includes partial reporting periods.
    - c. The report shall be received by DAQ within 30 calendar days after the semiannual period.
  16. Regardless of the date of issuance of this OP, the source shall comply with the schedule for report submissions outlined in Table 4-4. *[AQR 12.5.2.6(d) and AQR 12.5.2.8]*

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

Required Report	Applicable Period	Due Date
Semiannual report for 1 <sup>st</sup> six-month period	January, February, March, April, May, June	July 30 each year <sup>1</sup>
Semiannual report for 2 <sup>nd</sup> six-month period; any additional annual records required	July, August, September, October, November, December	January 30 each year <sup>1</sup>
Annual Compliance Certification	Calendar year	January 30 each year <sup>1</sup>
Annual Emissions Inventory Report	Calendar year	March 31 each year <sup>1</sup>
Annual Emissions Statement <sup>2</sup>	Calendar year	March 31 each year <sup>1</sup>
Notification of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission	As required	Within 24 hours of the permittee learns of the event
Excess Emissions that Pose a Potential Imminent and Substantial Danger	As required	Within 12 hours of when permittee learns of event
Report of Malfunctions, Startup, Shutdowns, or Deviations with Excess Emission	As required	Within 72 hours of the notification
Deviation Report without Excess Emissions	As required	Along with semiannual reports <sup>1</sup>
Performance Testing Protocol	As required	No less than 45 days, but no more than 90 days, before the anticipated test date <sup>1</sup>
Performance Testing	As required	Within 60 days of end of test <sup>1</sup>

<sup>1</sup>If the due date falls on a federal or Nevada holiday, or on any day the office is not normally open for business, the submittal is due on the next regularly scheduled business day.

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

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

## 4.5 MITIGATION

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

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## **5.0 PERMIT SHIELD**

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### Permit Shield

1. The source has not requested a permit shield. [AQR 12.5.2.9]

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## 6.0 OTHER REQUIREMENTS

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

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## 7.0 ADMINISTRATIVE REQUIREMENTS

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### 7.1 GENERAL

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



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

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

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

7. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application has been submitted. *[AQR 12.5.2.11(b)]*
8. For purposes of permit renewal, a timely application is a complete application that is submitted at least six months, but not more than 18 months, prior to the date of permit expiration. If a source submits a timely application under this provision, it may continue operating under its current Part 70 OP until final action is taken on its application for a renewed Part 70 OP. *[AQR 12.5.2.1(a)(2)]*

## **8.0 ATTACHMENTS**

### **8.1 APPLICABLE REGULATIONS**

#### Requirements Specifically Identified as Applicable

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

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

<b>Citation</b>	<b>Title</b>
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 12.0	"Applicability and General Requirements"
AQR 12.4	"Authority to Construct Application and Permit Requirements for Part 70 Sources"
AQR 12.5	"Part 70 Operating Permit Requirements"
AQR 12.9	"Annual Emissions Inventory Requirement"
AQR 13.2(b)(1)	"Subpart A – General Provisions"
AQR 13.2(b)(82)	"Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
AQR 13.2(b)(106)	"Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Stationary Category: Gasoline Dispensing Facilities"
AQR 14.1(b)(1)	"Subpart A – General Provisions"
AQR 14.1(b)(68)	"Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants"
AQR 14.1(b)(74)	"Subpart UUU – Standards of Performance for Calciners and Dryers in Mineral Industries"
AQR 14.1(b)(81)	"Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
AQR 18	"Permit and Technical Service Fees"
AQR 25	"Affirmative Defense for Excess Emissions due to Malfunctions, Startup, and Shutdown"
AQR 26	"Emission of Visible Air Contaminants"
AQR 28	"Fuel Burning Equipment"
AQR 40	"Prohibitions of Nuisance Conditions"
AQR 41	"Fugitive Dust"
AQR 42	"Open Burning"
AQR 43	"Odors in the Ambient Air"
AQR 70	"Emergency Procedures"
AQR 80	"Circumvention"
AQR 92	"Fugitive Dust from Unpaved Parking Lots and Storage Areas"
AQR 94	"Permitting and Dust Control for Construction Activities"

3. Clean Air Act Amendments (42 U.S.C. § 7401, et seq.)
4. Applicable 40 CFR sections are listed in Table 8-2.

**Table 8-2: Federal Standards**

<b>Citation</b>	<b>Title</b>
40 CFR Part 52.21	"Prevention of significant deterioration of air quality"
40 CFR Part 52.1470	"Approval and Promulgation of Implementation Plans, Subpart DD—Nevada"
40 CFR Part 60, Subpart A	"General Provisions"
40 CFR Part 60, Subpart OOO	"New Source Performance Standards for Nonmetallic Mineral Processing Plants"
40 CFR Part 60, Subpart UUU	"New Source Performance Standards for Mineral Processing Utilizing Calciners and Dryers"
40 CFR Part 60, Subpart IIII	"New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines"
40 CFR Part 63, Subpart A	"General Provisions"
40 CFR Part 63, Subpart ZZZZ	"National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
40 CFR Part 63, Subpart CCCCCC	"National Emission Standards for Hazardous Air Pollutants for Source Category - Gasoline Dispensing Facilities"
40 CFR Part 64	"Compliance Assurance Monitoring"
40 CFR Part 70	"State Operating Permit Programs"
40 CFR Part 82	"Protection of Stratospheric Ozone"