



DES
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AND SUSTAINABILITY



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PART 70

TECHNICAL SUPPORT DOCUMENT

(STATEMENT of BASIS)

APPLICATION FOR:
Minor Revision

SUBMITTED BY:
CertainTeed Gypsum Manufacturing Inc.

FOR:
CertainTeed Gypsum Manufacturing Inc.

Source ID: 00004

CertainTeed Gypsum Manufacturing Inc.

LOCATION:
13500 Blue Diamond Road
Las Vegas, Nevada 89161

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

Application Received: March 13, 2023

TSD Date: September 20, 2023

EXECUTIVE SUMMARY

CertainTeed Gypsum Manufacturing, Inc. (CertainTeed) owns and operates a wallboard manufacturing facility located in Clark County, Nevada. CertainTeed is located approximately 20 miles west of Las Vegas near Blue Diamond in the Las Vegas Valley Hydrographic Area (HA) 212. HA 212 is currently designated as an attainment area for all regulated air pollutants except ozone, which was classified as a moderate nonattainment area on January 5, 2023.

CertainTeed is categorized under SIC code 3275, “Gypsum Products” (NAICS code 327420, “Gypsum Product Manufacturing”). CertainTeed is neither a categorical stationary source as defined in AQR 12.2.2(j) nor does it belong to any other stationary source category regulated under Section 111 or 112 of the Act as of August 7, 1980. Therefore, fugitive emissions are not included in the source status determination. CertainTeed is a major source of CO, synthetic minor (80) of NO_x, synthetic minor for PM₁₀ and a minor source for PM_{2.5}, SO₂, VOC and HAPs, as well as a source of GHG emissions. Emission units at the source include rock crushing and screening equipment, the transport of raw rock, mill operations, plaster operations, and wallboard manufacturing. Table 1 shows potential emissions for the source.

This source is subject to 40 CFR Part 60, Subparts OOO, UUU, and IIII, and 40 CFR Part 63, Subparts CCCCCC and ZZZZ. However, the source will meet the federal requirements of Subpart ZZZZ by adhering to the federal requirements of 40 CFR Part 60, Subpart IIII.

This project increases the facility-wide PTE. Table-1 provides the facility-wide PTE after the project.

Table 1: Facility-Wide PTE Summary (TPY)

Pollutants	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs	H ₂ S	Pb	GHG ¹
Total	63.54	32.48	84.86	171.28	0.79	27.16	3.40	0	0	141,561

¹Expressed as metric tons of CO₂e

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ACRONYMS AND ABBREVIATIONS

(These terms may be seen in the Technical Support Document)

AQR	Clark County Air Quality Regulation
AST	aboveground storage tank
ATC	Authority to Construct
Avgas	aviation gasoline
CARB	California Air Resources Board
CFR	Code of Federal Regulations
CO	carbon monoxide
DAQ	Clark County Division of Air Quality
dscm	dry standard cubic meter
EPA	U.S. Environmental Protection Agency
EU	emission unit
GHG	greenhouse gas
HAP	hazardous air pollutant
hp	horsepower
MMBtu	Millions of British thermal units
MSP	Minor Source Permit
NAC	Nevada Administrative Code
NO _x	nitrogen oxides
NRS	Nevada Revised Statutes
NTTR	Nevada Test and Training Range
OP	Operating Permit
PM ₁₀	particulate matter less than 10 microns
PM _{2.5}	particulate matter less than 2.5 microns
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTE	potential to emit
RICE	reciprocating internal combustion engine
SDS	Safety Data Sheet
SIP	state implementation plan
SO ₂	sulfur dioxide
UST	underground storage tank
VEE	Visible Emissions Evaluation
VOC	volatile organic compound

I. SOURCE INFORMATION

Responsible Official: Sean Brennan
Phone Number: (702) 875-4111

II. PROCESS DESCRIPTION

The CP Mill (EU E.11) combines grinding, drying, and calcining operations into a single unit. The discharge terminal conveys the material to a 1,200-ton board rock bin. A rock elevator transfers the gypsum to the CP Mill, pulverizes it, then combines it with the flash calciner combustion gases. The calciner burns and converts the pulverized gypsum rock into stucco at 50 MMBtu/hr. The gases carry the calcinated stucco to the baghouses, which separate the stucco from the gas stream and control the particulate emissions during transference. The stucco is transported to storage bins and used for wallboard manufacturing.

PM₁₀ is the primary pollutant associated with this process. Pollutants from the CP Mill combustion include PM₁₀, NO_x, CO, VOCs, and SO₂.

Table II-1: Permitting History

Issued Date	Description
5/3/2022	Part 70 ATC – 12.4.3.2(b)
11/21/2021	Title V OP - Reopen for Cause
11/21/2021	Title V OP - Reopen for Cause
6/22/2020	Title V OP - Renewal

III. PERMITTING ACTION

This source is an existing Part 70 source, as defined in AQR 12.5.1(c), that is submitting this application to revise its major source permit. The source is proposing to replace the burner to emission unit (EU: E.11). The source appropriately applied for a minor revision to the Part 70 operating permit (OP) under AQR 12.4.3.2(e).

The permitting action shall address the following:

1. Replacing the burner to EU: E.11; and
2. Updating the PTE to reflect the change in emissions per pollutant as applicable.

Table III-1 lists the affected units addressed in the project for this ATC permit.

Table III-1. Affected Emission Units List

EU	Description	Rating	Manufacturer	Model No.	Serial No.	Group	SCC
E.11	C.P. Mill (burner)	37 MMBtu/hr	Maxon	140KDZER LE-NFS	18903163	5	30501513

IV. FACILITY EMISSION UNITS

See attachment section for a complete list of emission units at the facility.

V. CALCULATION OF EMISSIONS

Applicability

See the attachment section for the applicability emissions after the project. Applicability emissions because of this action do not change the facility's current status.

PTE

PTE is calculated to include any controls or limits, whether voluntarily proposed by the source or required. PTE does not include insignificant emission units and activities, including fugitive emissions.

Table V-1 shows the PTE associated with the affected emission unit in this action. PTE calculations are included in the attachments.

Table V-1. PTE of Affected Emission Units (tons per year)

EU	Condition	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs	H ₂ S	Pb
E.11	8,760 hours	8.54	8.54	7.88	17.97	0.10	0.88	0.31	0	0

Emission Increase

The emission increases for all the pollutants associated with the new burner for EU: E.11. Significance thresholds are not triggered by this project. A RACT analysis is not requisite as shown in Table V-2.

Table V-2. Emissions Increase Calculation and Significance Evaluation (tons per year)

Affected EU	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs	H ₂ S	Pb
Proposed PTE	63.54	32.48	84.86	171.28	0.79	27.16	3.40	0	0
Existing PTE	63.54	32.48	94.72	154.32	0.81	27.34	3.46	0	0
Δ Emissions	0.00	0.00	-9.86	16.96	-0.02	-0.18	-0.06	0	0
Minor NSR Significance Threshold	7.5	5.0	20	20	40	20	10/25	5	0.6
RACT Analysis Required	No	No	No	No	No	No	No	NA	NA

VI. CONTROL TECHNOLOGY

The proposed burner emissions were calculated using an emission rating of 40 ppm of NO_x and 150 ppm of CO as provided by the manufacturer's guarantee. The permittee proposed a 30 ppm of NO_x emission rating; however, the manufacturer lowest guarantee was 40 ppm. The CO emissions are higher than those of the previous burner. The increased emissions do not violate a voluntarily acceptable emissions limit (VAEL), an established limit, nor do they affect the status of the source or trigger additional regulations, so the increase isn't triggering any applicable requirements.

The AQR 92 and 94 language was removed from the controls section of the permit until further notice.

VII. EMISSION LIMITS

Replacing the burner from the C.P. Mill doesn't trigger additional or a change in the existing emission limits. However, as an affected facility under 40 CFR Part 60, Subpart UUU, the permittee shall not from any affected facility:

1. Emit particulate matter in excess of 0.092 g/dscm for calciners and calciners and dryers in series nor more than 0.057 g/dscm for dryers only.
2. Exhibit greater than 10 percent opacity unless the emissions are from a wet scrubbing control device.

VIII. OPERATIONAL LIMITS

The CP Mill for the combustion component is permitted for unlimited operation (8,760 hours per year).

The AQR 92 and 94 language was removed from the operational limits section of the permit until further notice.

IX. REVIEW OF APPLICABLE REGULATIONS

Local

Additional local regulations are not triggered by the burner replacement. The existing provisions per any applicable regulations established in the OP will remain effective.

Federal Regulations

40 CFR Part 60, Subpart UUU

This subpart applies to each calciner and dryer at an affected facility. As an existing affected facility, and the source must continue to comply with the provisions of this subpart.

X. MONITORING

There are no monitoring requirements associated with the burner for this emission unit. The existing provisions as required by 40 CFR Part 60, Subpart UUU, remain binding.

XI. PERFORMANCE TESTING

The source was required to perform an initial performance test for particulate matter under 40 CFR Part 60, Subpart UUU, will still be required to perform subsequent testing every 5 years.

XII. INCREMENT ANALYSIS

CertainTeed Gypsum Manufacturing is a major source in Hydrographic Area 212 (the Las Vegas Valley). Permitted emission units include a mill, 6 dryers, 7 calciners, 2 paper heaters, one fire pump and other gypsum manufacturing equipment. Since minor source baseline dates for NO_x (October 21, 1988) and SO₂ (June 29, 1979) have been triggered, Prevention of Significant Deterioration (PSD) increment analysis is required.

DAQ modeled the source using AERMOD to track the increment consumption. Stack data submitted by the applicant were supplemented with information available for similar emission units. Five years (2011 to 2015) of meteorological data from the McCarran Station were used in the model. U.S. Geological Survey National Elevation Dataset terrain data were used to calculate elevations. Table XII-1 shows the location of the maximum impact and the potential PSD increment consumed by the source at that location. The impacts are below the PSD increment limits.

Table XII-1: PSD Increment Consumption

Pollutant	Averaging Period	Source's PSD Increment Consumption (µg/m ³)	Location of Maximum Impact	
			UTM X (m)	UTM Y (m)
SO ₂	3-hour	2.93 ¹	645275	3991315
SO ₂	24-hour	0.76 ¹	645727	3991531
SO ₂	Annual	0.36	645727	3991531
NO _x	Annual	24.02	645727	3991531

¹ Highest Second High Concentration.

XIII. PUBLIC PARTICIPATION

This is an existing Part 70 source proposing a modification which will increase the source-wide PTE. However, the emission increase is less than the minor NSR significant levels in AQR 12.5.1(d). Therefore, the public participation procedures in AQR 12.5 do not apply.

XIV. ATTACHMENTS

Table XIV-1: List of Emission Units at the Facility

EU	Rating	EU Description	Controls	Manufacturer	Model No.	Serial No.
Group 3A—Truck Unloading Station						
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			
Group 5—Discharge Terminal						
E1		Stacker E.1	Moisture			
E.2		Conveyor System (5 Belts)	Moisture			
E.8.1		Silo #1	BV01			

EU	Rating	EU Description	Controls	Manufacturer	Model No.	Serial No.
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			
E.12	55 ton/hr	Stucco Cooler	BH02			
Group 6—Rolling Mills						
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			
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			
Group 7—Plaster Production/Kettles						
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			

EU	Rating	EU Description	Controls	Manufacturer	Model No.	Serial No.
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			
Group 8—Plaster Operations						
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			
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			

EU	Rating	EU Description	Controls	Manufacturer	Model No.	Serial No.
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			
Group 9—Stucco Storage Bins						
I.1		Stucco Screw Conveyor System (2 Screw Conveyors)	BH23			
I.2	55 ton/hr	Cooling Bins System (2 Bins)	BV05			
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			
Group 10—Boardplant						
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				

EU	Rating	EU Description	Controls	Manufacturer	Model No.	Serial No.
J.4		Radial Center Saw	BH24			
J.5		End Saws (4 Saws)	BH24			
J.6		Slutter Machine	BH24			
J.7		STMP Feed System	BH25			
Group 11—Accelerator System						
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			
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			
Group 14—Wallboard Recycling System						
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			
Engines						
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

EU	Rating	EU Description	Controls	Manufacturer	Model No.	Serial No.
N.7	65 hp	Diesel Engine, DOM: 2004		Cummins	B3.3	68027481
P.01	136 hp	Diesel Fire Pump, DOM: 2018		John Deere	4050HFC28	PE4045N017106
Miscellaneous						
T.1	1,000 gal	Gasoline Aboveground Storage Tank				
Fugitives – Haul Roads/Stockpiles						
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.

Table XIV-2: Applicability

Pollutants	PM ₁₀	PM _{2.5}	NO _x	CO	SO ₂	VOC	HAPs	H ₂ S	Pb	GHG
Applicability Emissions 12/5/2022	226.05	59.91	114.47	163.14	0.83	28.22	3.51	0	0	0
Old Burner	8.54	8.54	17.74	1.01	0.12	1.06	0.37	0	0	0
New Burner	8.54	8.54	7.88	17.97	0.10	0.88	0.31	0	0	0
New Applicability	226.05	59.91	104.61	180.10	0.81	28.04	3.45	0	0	0

Table XIV-3: Emission Calculations for Proposed Burner (EU: E.11)

EU#:	E.11 proposed		Emission Factor (lb/mmBtu)	Potential Emissions		
Make:	MAXON	lb/hr		lb/day	ton/yr	
Model:	140KDZERLE-NFS	PM10		1.95	46.82	8.54
S/N:	18903163	PM2.5		1.95	46.82	8.54
		NOx	0.0486	1.80	43.16	7.88
	37.0 mmBtu/hr	CO	0.1109	4.10	98.48	17.97
	24.0 hr/day	SO ₂	6.00E-04	0.02	0.53	0.10
	8760 hr/yr	VOC	0.0054	0.20	4.80	0.88
		HAP	1.90E-03	0.07	1.69	0.31
Concentrations:	%O ₂	Lead	4.90E-07	1.81E-05	4.35E-04	7.94E-05
	40 ppm NOx					
	150 ppm CO					
Fuel:	Propane					