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## PART 70 OPERATING PERMIT

**SOURCE ID: 17286**

Blue Diamond Hill Gypsum  
8360 Nevada Highway 159  
Blue Diamond, NV 89004

**ISSUED ON: November 13, 2017**

**EXPIRES ON: November 12, 2022**

**Revised on: January 26, 2022**

**Current action: Reopenings for Cause**

**Issued to:**

Gypsum Resources, LLC  
8360 Nevada Highway 159  
Blue Diamond, NV 89004

**Responsible Official:**

James Rhodes  
President  
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**NATURE OF BUSINESS:**

SIC code 1499, "Miscellaneous Nonmetallic Minerals, Except Fuels"  
NAICS code 212399, "All Other Nonmetallic Mineral Mining"

**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.**

A handwritten signature in blue ink that reads "Theodore A. Lendis".

Theodore A. Lendis, Permitting Manager

## EXECUTIVE SUMMARY

Gypsum Resources, LLC (“Blue Diamond Hill Gypsum”) is a gypsum processing operation located in the Las Vegas Valley Area (Hydrographic Area 212), which is currently designated as an attainment area for all regulated air pollutants except ozone, for which it was classified as a marginal nonattainment area on August 3, 2018. The source is not a categorical source as defined in AQR 12.2.2(j).

The source consists of screens, crushers, conveyors, an overburden process, blasting, stockpiles, paved and unpaved haul roads, continuous-duty diesel engines, and a continuous-duty diesel water pump. The source also has 13-hp diesel light stands that are designated as insignificant activities. The initial Part 70 OP was issued November 13, 2017, with a significant revision issued on November 14, 2019, and an administrative revision on September 8, 2020. Blue Diamond Hill Gypsum is also a source of greenhouse gas pollutants.

The following table summarizes the source potential to emit for 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>	GHG <sup>2</sup>
Gypsum Processing	43.26	11.37	78.98	12.33	0.10	4.28	0.10	6932.05
Fugitives	99.36	11.15	2.38	12.29	0	0	0	0
Tons/year	142.62	22.52	81.36	24.62	0.10	4.28	0.10	6932.05

<sup>1</sup>Ten tons for any individual hazardous air pollutant or 25 tons for combination of all HAPs.

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

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

Pursuant to AQR 12.5.2, all terms and conditions in Sections I through V and Attachment 1 of this permit are federally enforceable unless explicitly denoted otherwise.

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## I. ACRONYMS

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

<b>Acronym</b>	<b>Term</b>
ANFO	ammonium nitrate-fuel oil
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	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
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
SIC	Standard Industrial Classification
SO <sub>2</sub>	sulfur dioxides
STL	Settlement Agreement
U.S.C.	United States Code
VMT	vehicle miles traveled
VOC	volatile organic compound

## II. GENERAL CONDITIONS

### A. GENERAL REQUIREMENTS

1. The permittee shall comply with all conditions of the Part 70 Operating Permit (OP). Any permit noncompliance may constitute a violation of the Clark County Air Quality Regulations (AQRs), Nevada law, and the Clean Air Act (Act), and is grounds for enforcement action; permit termination, revocation and reissuance, or revision; or denial of a permit 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 not be affected and shall 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 any property rights of any sort, or any exclusive privilege. *[AQR 12.5.2.6(g)(4)]*
5. The permittee agrees to allow inspection of the premises to which this permit relates by any authorized representative of the Control Officer at any time during the permittee's hours of operation without prior notice. The permittee shall not obstruct, hamper, or interfere with any such inspection. *[AQR 4.1; AQR 5.1.1; & AQR 12.5.2.8(b)]*
6. The permittee shall allow the Control Officer, upon presentation of credentials, to: *[AQR 4.1 & AQR 12.5.2.8(b)]*
  - a. Access and copy any records that must be kept under the conditions of the permit;
  - b. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
  - c. Sample or monitor substances or parameters for the purpose of assuring compliance with the permit or applicable requirements; and
  - d. Document alleged violations using such devices as cameras or video equipment.
7. Any permittee who fails to submit relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit 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 that is clearly visible and accessible to facility employees and DAQ representatives. *[AQR 12.5.2.6(m)]*

**B. MODIFICATION, REVISION, AND RENEWAL REQUIREMENTS**

1. No person shall begin actual construction of a New Part 70 source, or modify or reconstruct an existing Part 70 source that falls within the preconstruction review applicability criteria, without first obtaining an Authority to Construct (ATC) Permit from the Control Officer. *[AQR 12.4.1.1(a)]*
2. This 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 that 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 & 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 eighteen 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 Operating Permit (OP) until final action is taken on its application for a renewed Part 70 OP. *[AQR 12.5.2.1(a)(2)]*

### **C. REPORTING, NOTIFICATIONS, AND INFORMATION REQUIREMENTS**

1. The permittee shall submit all compliance certifications to the U.S. Environmental Protection Agency (EPA) and to the Control Officer. *[AQR 12.5.2.8(e)(4)]*
2. Any application form, report, or compliance certification submitted to the Control Officer pursuant to the OP or AQRs shall contain a certification by a responsible official, with an original signature, of truth, accuracy, and completeness. This certification (and any other certification required under AQR 12.5) shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. *[AQR 12.5.2.6(l)]*
3. The permittee shall furnish to the Control Officer, in writing and within a reasonable time, any information that the Control Officer may request to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Control Officer copies of records the permit requires keeping. The permittee may furnish records claimed to be confidential directly to the Administrator, along with a claim of confidentiality. *[AQR 12.5.2.6(g)(5)]*
4. Upon request of the Control Officer, the permittee shall provide information or analyses that will disclose the nature, extent, quantity, or degree of air contaminants that are or may be discharged by the source, along with the type or nature of control equipment in use. The Control Officer may require that 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 is authorized to inspect any article, machine, equipment, or other contrivance necessary to make the inspection and report. *[AQR 4.1]*
5. The permittee shall submit annual emissions inventory reports that meet the following requirements: *[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 Saturday or Sunday, or on a federal or Nevada holiday, the submittal shall be due on the next regularly scheduled business day);
  - b. The calculated actual annual emissions from each emission unit (EU) 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 PTE in the permit or an equivalent method approved by the Control Officer prior to submittal; and

- c. The first page of text will be a signed certification containing the sentence: “I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate, and complete.” This statement shall be signed and dated by a responsible official of the company (a sample form is available from DAQ).
6. Stationary sources that emit 25 tons or more of nitrogen oxide (NO<sub>x</sub>) and/or 25 tons or more of volatile organic compounds (VOCs) during a calendar year from emission units, insignificant activities, and exempt activities shall submit an annual emissions statement for both pollutants. This statement must include actual annual NO<sub>x</sub> and VOC emissions from all activities, including emission units, insignificant activities, and exempt activities. Emissions statements are separate from, and additional to, the calculated annual emissions reported each year for all regulated air pollutants (i.e., the emissions inventory report). *[AQR 12.9.1]*

#### **D. COMPLIANCE REQUIREMENTS**

1. The permittee shall not use as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. *[AQR 12.5.2.6(g)(2)]*
2. Any person who violates any provision of the AQRs, including, but not limited to, any application requirement; any permit condition; any fee or filing requirement; any duty to allow or carry out inspection, entry, or monitoring activities; or any other DAQ requirements is guilty of a civil offense and shall pay a civil penalty levied by the Air Pollution Control Hearing Board and/or the Hearing Officer of not more than \$10,000. Each day of violation constitutes a separate offense. *[AQR 9.1 & NRS 445B.640]*
3. Any person aggrieved by an order issued pursuant to AQR 9.1 is entitled to a review, as provided in Chapter 233B of the Nevada Revised Statutes (NRS). *[AQR 9.12]*
4. The permittee shall comply with the requirements of 40 CFR Part 61, Subpart M—the National Emission Standard for Asbestos—for all demolition and renovation projects. *[AQR 13.1(b)(8)]*
5. The permittee shall certify compliance with the terms and conditions contained in the Part 70 OP, including emission limitations, standards, work practices, and the means for monitoring such compliance. *[AQR 12.5.2.8(e)]*
6. The permittee shall submit compliance certifications annually in writing to the Control Officer (4701 W. Russell Road, Suite 200, Las Vegas, Nevada 89118) and the Administrator for Region 9 (Director, Air and Radiation Divisions, 75 Hawthorne St., San Francisco, California 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. The 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 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, and 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 is required and in which an excursion or exceedance, as defined under 40 CFR Part 64, occurred.
7. The permittee shall report to the Control Officer any startup, shutdown, malfunction, emergency, or deviation that causes emissions of regulated air pollutants in excess of limits set by regulations or this permit. The report shall be in two parts: *[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 [AQCompliance@ClarkCountyNV.gov](mailto:AQCompliance@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.
8. With the semiannual monitoring report, the permittee shall report to the Control Officer all deviations from permit conditions that do not result in excess emissions, including those attributable to malfunction, startup, or shutdown. Reports shall identify the probable cause of each deviation and any corrective actions or preventative measures taken. *[AQR 12.5.2.6(d)(4)(B)]*
9. The owner or operator of any source required to obtain a permit under AQR 12 shall report to the Control Officer any emissions in excess of an applicable requirement or emission limit that pose a potential imminent and substantial danger to public health and safety or the environment as soon as possible, but no later than 12 hours after the deviation is discovered, and submit a written report within two days of the occurrence. *[AQR 25.6.2]*

## **E. PERFORMANCE TESTING REQUIREMENTS**

1. Upon request of the Control Officer, the permittee shall test or have tests performed to determine the emissions of air contaminants from any source whenever the Control Officer has reason to believe that an emission in excess of that allowed by the AQRs is occurring. The Control Officer may specify testing methods to be used in accordance with good professional practice, and may observe the testing. All tests shall be conducted by reputable, qualified personnel. *[AQR 4.2]*

2. Upon request of the Control Officer, the permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants. [AQR 4.2]
3. The permittee shall submit to the Control Officer for approval a performance testing protocol that contains testing, reporting, and notification schedules, test protocols, and anticipated test dates no less than 45 days, but no more than 90 days, prior to the anticipated date of the performance test, unless otherwise specified in Section III.E of this permit. [AQR 12.5.2.8]
4. The permittee shall submit to EPA for approval any alternative test methods EPA has not already approved to demonstrate compliance with a requirement under 40 CFR Part 60. [40 CFR Part 60.8(b)]
5. The permittee shall submit a report describing the results of each performance test to the Control Officer within 60 days of the end of the test. [AQR 12.5.2.8]

### III. EMISSION UNITS AND APPLICABLE REQUIREMENTS

#### A. EMISSION UNITS

1. The stationary source covered by this Part 70 OP is defined to consist of the emission units and associated appurtenances summarized in Table III-A-1. [ATC February 17, 2017 & AQR 12.5.2.3]

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

EU	Description	Capacity (tons/hr)	Manufacturer	Model #	Serial #
<b>Gypsum Processing Plant</b>					
A00	Truck Unloading to Stockpile from Mining				
A01	Loader to VGF	800			
	VGF (VGF to VGF Underbelt)				
A02	VGF Underbelt (VGF Underbelt to Reject Conveyor)				
A03	Reject Conveyor (Reject Conveyor to Screen)				
A39	Reject Screen (8' x 20')	350	Terex	LJ-TSH8203-32	
A04	Screen Underbelt (Screen Underbelt to Recirc Conveyor #1)				
A06	Recirc Conveyor (Recirc Conveyor #1 to VGF)				
A09	Reject Underbelt (Reject Underbelt to Reject Stacker)				
A33	Reject Stacker (Reject Stacker to Stockpile)				
A05	HSI Crusher (VGF to HSI Crusher)	800	Terex	1316	TRX1316BVOKCC0391
	HSI Underbelt				
A07	HSI Underbelt to Surge Bin				

EU	Description	Capacity (tons/hr)	Manufacturer	Model #	Serial #
A10	Surge Bin (Surge Bin to West Conveyor)				
A11	West Conveyor (West Conveyor to West Screen)				
A08	West Screen (8' x 20')	800	Terex	LJ-TSH8203-32	
A12	West Underbelt (West Underbelt to Cone Conveyor)				
A48	Cone Conveyor (Conveyor to Cone Crusher)				
A34	Cone Crusher	250	Terex	MVP 450x	
	Cone Underbelt				
A35	Cone Underbelt (Cone Underbelt to Recirc Conveyor #2)				
A40	Recirc Conveyor #2 (Recirc Conveyor #2 to West Screen)				
A36	Belt Conveyor #1— #7				
A38	Stacker 2"				
A41	Belt Conveyor #8 –#14				
A79	Stacker 1/8"				
<b>Truck Loading</b>					
E01	Loader to Hopper				
E02	Conveyor to Conveyor				
	Conveyor to Truck				
E03	Loader to Hopper				
E04	Conveyor to Conveyor				
	Conveyor to Truck				
F01 <sup>1</sup>	Loader to Hopper				
F02 <sup>1</sup>	Conveyor to Conveyor				
	Conveyor to Truck				
<b>Miscellaneous Activities</b>					
A001	Blasting	25,000 ft <sup>2</sup>			
A002	Overburden Removal	880			
A003	Drilling	154 holes/day			
A32	Stockpiles	25.0 Acres			
B01	Unpaved Haul Road; BLM road	4 Miles R.T.			
B02	Gypsum Paved Haul Road; on-site	1 Mile R.T.			
B03	Gypsum Paved Haul Road; Overburden	0.8 Miles R.T.			
B04	Unpaved Haul Road, Material Hauling	1.2 Miles R.T.			
<b>Internal Combustion Engines</b>					
C01	Continuous-duty Diesel Engine	2,206 hp	Caterpillar; DOM 2007	XQ1500	G4W00376
	Genset	1500 kW	Caterpillar	3512	EBG00282

EU	Description	Capacity (tons/hr)	Manufacturer	Model #	Serial #
C05	Continuous-duty Diesel Engine	173 hp	Isuzu; DOM 2007	BI-4HK1X	4HK1XDIBA-01
	Genset	100 kW	Whisperwatt	DCA125SSIU	7510150
C06	Continuous-duty Diesel Engine	99 hp	John Deere; DOM 2011	4045TF285E	N/A
	Genset	63 kW	Mecc Alte	ECO 32-L/4	0001440549
C07	Continuous-duty Diesel Engine	80 hp	John Deere; DOM 1998	4045DF150	N/A
	Water Pump	60 kW	Power Prime	98DV150	372870
C08	Continuous-duty Diesel Engine	107 hp	John Deere; DOM 2012	4045HFG92	PE4045015497
	Genset	56 kW	Atlas Copco	QAS70	N/A

<sup>1</sup>This process covers the front end loader to truck loading operation.

- The units in Table III-A-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 III-A-2: Summary of Insignificant Activities**

Rating	Description	Manufacturer	Model
13 hp	Diesel Light Plant	Kubota, DOM 2006	D905-BG-ES01
13 hp	Diesel Light Plant	Kubota, DOM 2006	D905-BG-ES01
13 hp	Diesel Light Plant	Kubota, DOM 2006	D905-BG-ES01
13 hp	Diesel Light Plant	Mitsubishi, DOM 2011	L3E
13 hp	Diesel Light Plant	Mitsubishi, DOM 2011	L3E
13 hp	Diesel Light Plant	Mitsubishi, DOM 2007	L3E
13 hp	Diesel Light Plant	Mitsubishi, DOM 2007	L3E
13 hp	Diesel Light Plant	Mitsubishi, DOM 2008	L3E

## B. 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 less than 12 consecutive months.

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

## C. EMISSION LIMITATIONS AND STANDARDS

### 1. Emission Limits

- a. The permittee shall not allow actual emissions from the individual emission units to exceed the calculated PTE listed in Table III-C-1 on a consecutive 12-month total. *[Title V OP, 11/13/2017; Application for Revision, 8/17/2018]*

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

EU	Condition	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAPs	H <sub>2</sub> S	Pb
A00	1,280,000 tons/yr	5.12	0.77	0	0	0	0		0	0
A01	1,280,000 tons/yr	2.79	0.42	0	0	0	0		0	0
A02	560,000 tons/yr	2.80	0.84	0	0	0	0		0	0
A03	Emission in A39			0	0	0	0		0	0
A39	560,000 tons/yr	0.22	0.02	0	0	0	0		0	0
A04	560,000 tons/yr	2.80	0.84	0	0	0	0		0	0
A06	Emission in A01			0	0	0	0		0	0
A09	560,000 tons/yr	0.52	0.16	0	0	0	0		0	0
A33	560,000 tons/yr	2.07	0.57	0	0	0	0	0	0	0
A05	1,280,000 tons/yr	0.83	0.16	0	0	0	0	0	0	0
A07	1,280,000 tons/yr	0.06	0.02	0	0	0	0	0	0	0
A10	1,280,000 tons/yr	0.06	0.02	0	0	0	0	0	0	0
A11	Emission in A08			0	0	0	0		0	0
A08	1,280,000 tons/yr	0.51	0.04	0	0	0	0	0	0	0
A12	400,000 tons/yr	2.00	0.60	0	0	0	0	0	0	0
A48	Emission in A34			0	0	0	0		0	0
A34	400,000 tons/yr	0.26	0.05	0	0	0	0	0	0	0
A35	400,000 tons/yr	2.00	0.60	0	0	0	0	0	0	0
A40	Emission in A08			0	0	0	0		0	0
A36/A41 <sub>1</sub>	1,280,000 tons/yr	8.29	2.49	0	0	0	0	0	0	0
A38/A79 <sub>1</sub>		4.74	1.30	0	0	0	0	0	0	0
E01 <sup>2</sup>	1,280,000 tons/yr	4.74	0.71	0	0	0	0	0	0	0
E02 <sup>2</sup>		2.37	0.71	0	0	0	0	0	0	0
E03 <sup>2</sup>		0	0	0	0	0	0	0	0	0
E04 <sup>2</sup>		0	0	0	0	0	0	0	0	0
F01 <sup>2</sup>		0	0	0	0	0	0	0	0	0
F02 <sup>2</sup>		0	0	0	0	0	0	0	0	0
A001	25,000 ft <sup>2</sup> /200 blasts/yr	2.88	0.17	0	0	0	0	0	0	0
A001	600 tons/yr	0	0	2.38	12.29	0	0	0	0	0
A002	3,400,000 tons/yr	13.60	2.04	0	0	0	0	0	0	0
A003	14,000 holes/yr	4.76	0.28	0	0	0	0	0	0	0
A32	25.0 Acres	7.57	1.14	0	0	0	0	0	0	0
B01	128,000 VMT	48.45	4.91	0	0	0	0	0	0	0

EU	Condition	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	HAPs	H <sub>2</sub> S	Pb
B02	32,000 VMT	2.42	0.36	0	0	0	0	0	0	0
B03	68,000 VMT	5.15	0.78	0	0	0	0	0	0	0
B04	38,400 VMT	14.53	1.47	0	0	0	0	0	0	0
C01	4,200 hrs/yr	0.41	0.41	67.20	8.89	0.06	1.63	0.05	0	0
C05	6,500 hrs/yr	0.16	0.16	2.40	1.02	0.01	1.41	0.02	0	0
C06	6,500 hrs/yr	0.10	0.10	2.17	1.22	0.01	0.81	0.01	0	0
C07	4,200 hrs/yr	0.37	0.37	5.21	1.12	0.01	0.42	0.01	0	0
C08	8,760 hrs/yr	0.01	0.01	2.00	0.08	0.01	0.01	0.01	0	0

<sup>1</sup>A36/A41 and A38/A79 cannot exceed 1,280,000 ton/yr for both process lines.

<sup>2</sup>EUs: E01, E02, E03, E04, F01, and F02 cannot exceed 1,280,000 ton/yr from the six truck loadout processes.

- b. The permittee shall not exhibit fugitive emissions with an opacity in excess of 7% based on the average of five 6-minute averages, from all the conveyors and transfer points (EUs: A02, A03, A04, A06, A09, A11, A12, A35, A36, A40, A41, A48, E01, E02, E03, E04, F01 & F02) and stackers (EUs: A33, A38, & A79). *[MSP September 10, 2013, Section IV A, Condition 2(b) & 40 CFR Part 60.672]*
- c. The permittee shall not discharge visible emissions from the HSI Crusher (EU: A05), HSI Underbelt (EU: A07), Surge Bin (EU: A10), West Screen (EU: A08), and Cone Crusher (EU: A34) vented to baghouse #1 stack (CD: D01) and the reject screen (EU: A39) vented to baghouse #2 stack (CD: D02) that exhibit an opacity in excess of 7% based on the average of ten 6-minute averages. *[ATC February 17, 2017, Section IV A, Condition 2(c) & 40 CFR Part 60.672]*
- d. The permittee shall not discharge particulate matter (PM) emissions from the baghouse stacks in excess of 0.032 g/dscm (0.014 gr/dscf) from the emission units that commenced construction after April 22, 2008 (CDs: D01 & D02). *[ATC February 17, 2017, Section IV A, Condition 2(d) & 40 CFR Part 60.672]*
- e. The permittee shall not discharge PM emissions from the baghouse stacks in excess of 2.17 lbs/hr from CD: D01. *[ATC February 17, 2017, Section IV A, Condition 2(e) & AQR 12.5.2.6(b)]*
- f. The permittee shall not discharge PM emissions from the baghouse stacks in excess of 0.57 lbs/hr from CD: D02. *[ATC February 17, 2017, Section IV A, Condition 2(f) & AQR 12.5.2.6(b)]*

### Other

- g. The permittee shall not discharge into the atmosphere, from any emission unit, any air contaminant in excess of an average of 20% opacity for a period of more than six consecutive minutes (EUs: A001, A002, A003, A00, A01, A32, B01, B02, B03, B04, C01, C05, C06, C07 & C08). *[MSP September 10, 2013, Section IV A, Condition 2(a) & AQR 26.1.1]*

### Fugitive Dust

- h. The permittee shall not cause or allow fugitive dust from trackout, which includes accumulation of mud or dirt on curbs, gutters, sidewalks, or paved surfaces, or from the handling, transport, or storage of any material in a manner that allows visible emissions of particulate matter to: *[AQR 94.14(a) & AQR 94.14(e)]*
  - i. Exceed 20% opacity using the Time Averaged Method (AQR 94.15.2) or the Intermittent Emissions Method (AQR 94.15.3);
  - ii. Exceed 50% opacity using the Instantaneous Method (AQR 94.15.4);
  - iii. Extend more than 100 feet; or
  - iv. Cross a property line.
- i. The permittee shall not allow fugitive dust emissions from unpaved parking lots or storage areas of more than 5,000 square feet to exceed: *[AQR 92.4(a)]*
  - i. 20% opacity based on the Opacity Test Method (AQR 92.6.1); or
  - ii. 50% opacity based on the Instantaneous Method (AQR 92.6.2).
- j. The permittee shall not allow a fugitive dust plume from an unpaved parking lot or storage area of more than 5,000 square feet to cross a property line. *[AQR 92.4(b)]*

## **2. Operational Limits**

- a. The permittee shall not allow any operational activities, which includes truck loading, on Sundays. *[ATC February 17, 2017, Section IV A, Condition 3(a)]*
- b. The permittee is limited to operating 16 hours per day during the weekdays (Monday through Friday) and 10 hours per day on Saturday, which includes truck loading. *[ATC February 17, 2017, Section IV A, Condition 3(b)]*
- c. The permittee shall limit the total throughput of materials for production of both 1/8" and 2" products to 1,280,000 tons in any consecutive 12-month period. *[ATC February 17, 2017, Section IV A, Condition 3(e)]*
- d. The permittee shall limit the number of blasts to 200 in any consecutive 12-month period (EU: A001). *[Significant Permit revision to the Part 70 Permit received August 18, 2018]*
- e. The permittee shall limit the blasting operations to an average 25,000 square feet per blast in any consecutive 12-month period (EU: A001). *[Significant Permit revision to the Part 70 Permit received August 18, 2018]*
- f. The permittee shall limit the consumption of ammonium nitrate-fuel oil (ANFO) for all blasting activities to 600 tons in any consecutive 12-month period (EU: A001). *[Significant Permit revision to the Part 70 Permit received August 18, 2018]*
- g. The permittee shall limit the overburden operations to 3,400,000 tons in any consecutive 12-month period (EU: A002). *[ATC February 17, 2017, Section IV A, Condition 3(f)]*

- h. The permittee shall limit the drilling operations to 14,000 holes in any consecutive 12-month period (EU: A003). *[Significant Permit revision to the Part 70 Permit received August 18, 2018]*
- i. The permittee shall limit the total stockpile area to 25 acres at any given time (EU: A32). *[Significant Permit revision to the Part 70 Permit received August 18, 2018]*
- j. The permittee shall limit the unpaved Bureau of Land Management (BLM) access road to 128,000 vehicle miles traveled (VMT) in any consecutive 12-month period (EU: B01). *[Significant Permit revision to the Part 70 Permit received August 18, 2018]*
- k. The permittee shall limit the paved roads for on-site operations to 32,000 VMT in any consecutive 12-month period (EU: B02). *[Significant Permit revision to the Part 70 Permit received August 18, 2018]*
- l. The permittee shall limit the paved roads for overburden operations to 68,000 VMT in any consecutive 12-month period (EU: B03). *[Significant Permit revision to the Part 70 Permit received August 18, 2018]*
- m. The permittee shall limit the unpaved roads for material hauling operations to 38,400 VMT in any consecutive 12-month period (EU: B04). *[Significant Permit revision to the Part 70 Permit received August 18, 2018]*
- n. The permittee shall limit the hours for the operation of each continuous-duty diesel engine (EU: C01) and continuous-duty diesel water pump (EU: C07) to 4,200 hours in any consecutive 12-month period. *[ATC February 17, 2017, Section IV A, Condition 3(k)]*
- o. The permittee shall limit the hours for the operation of each continuous-duty diesel engine (EUs: C05 & C06) to 6,500 hours in any consecutive 12-month period. *[Significant Permit revision to the Part 70 OP received August 18, 2018]*
- p. The permittee shall limit the total truck loading for shipping of material to 1,280,000 tons in any consecutive 12-month period (EUs: E01, E02, E03, E04, F01 & F02).

### 3. Emission Controls

#### Gypsum Processing

- a. The permittee shall incorporate, and maintain in good operating condition at all times, an effective water suppression system to control visible emissions within allowable opacity limits for the transfer points, drop points, drilling, and overburden operations. *[MSP September 10, 2013, Section IV B, Condition 2 & STL contained in HOO dated September 27, 2013]*

The permittee shall maintain the moisture for any gypsum processes not controlled by the baghouses by applying moisture at a minimum of 1.5% in materials less than 0.25” in diameter, which will maintain an 81.5% control on PM<sub>10</sub> emissions. *[ATC February 17, 2017, Section IV B, Condition 2]*



- b. The permittee shall maintain the moisture for the overburden operations by applying moisture at a minimum of 2.5% in materials less than 0.25” in diameter, which will maintain a 90% control on PM<sub>10</sub> emissions. *[ATC February 17, 2017, Section IV B, Condition 3]*
- c. The permittee shall maintain the moisture for the drilling operations by applying moisture at a minimum of 2.5% in materials less than 0.25” in diameter, which will maintain a 90% control on PM<sub>10</sub> emissions.
- d. The permittee shall employ adequate water sprays at pertinent locations where moisture is required to ensure compliance with moisture and opacity limits. *[MSP September 10, 2013, Section IV B, Condition 3]*

### Control Devices

- e. The permittee shall vent PM emissions from the crushers (EUs: A05 & A34), screens (EUs: A08 & A39), Vibrating Grizzly Feeder (VGF) (EU: A01), surge bin (EU: A10), and belt conveyor (EU: A07) to a baghouse at all times the processing equipment is operating. *[ATC February 17, 2017, Section IV B, Condition 5]*
- f. The permittee shall maintain and operate the baghouses on the crushers (EUs: A05 & A34), screens (EUs: A08 & A39), VGF (EU: A01), surge bin (EU: A10), and belt conveyor (EU: A07) to effectively control PM at all times the processing equipment is operating. *[ATC February 17, 2017, Section IV B, Condition 6]*
- g. The permittee shall operate each baghouse at all times any affected emission unit is operating, as indicated in Table III-C-2. *[ATC February 17, 2017, Section IV B, Condition 7]*

**Table III-C-2: Summary of Add-On Control Devices**

CD	Affected EU	Device Type	Manufacturer	Model No.	Pollutant
D01	A05, A07, A08, A10, A34	Baghouse #1	Southern Felt	120-TA-12	PM/PM <sub>10</sub> /PM <sub>2.5</sub>
D02	A01, A39	Baghouse #2	Southern Felt	80-TA-12	PM/PM <sub>10</sub> /PM <sub>2.5</sub>

- h. The permittee shall operate and maintain the baghouses on the associated emission units to attain a control efficiency of 99.0% for all particulate emissions. *[HHO dated August 15, 2016 & ATC February 17, 2017, Section IV B, Condition 8]*
- i. The permittee shall maintain an effective seal around the baghouses by correcting all leaks adversely affecting its performance. *[ATC February 17, 2017, Section IV B, Condition 9]*
- j. The permittee shall maintain the pressure drop across the baghouses (CDs: D01 & D02) within the range specified by the manufacturer, which is a ½” – 8” water column. *[ATC February 17, 2017, Section IV B, Condition 10]*

### Engines/Water Pump

- k. The permittee shall operate each of the continuous-duty diesel engines (EUs: C01, C05, C06 & C08) and the continuous-duty diesel water pump (EU: C07) with turbochargers and aftercoolers. *[ATC February 17, 2017, Section IV B, Condition 11; 40 CFR Part 60, Subpart III; 40 CFR Part 63, Subpart ZZZZ]*
- l. The permittee shall operate and maintain each of the continuous-duty diesel engines (EUs: C01, C05, C06 & C08) and the continuous-duty diesel water pump (EU: C07) in accordance with the manufacturer's specifications. *[ATC February 17, 2017, Section IV B, Condition 12; 40 CFR Part 60, Subpart III; 40 CFR Part 63, Subpart ZZZZ]*
- m. The permittee shall only combust diesel fuel with a maximum sulfur content of 15 ppm and either a minimum cetane index of 40 or a maximum aromatic content of 35 percent by volume in each of the continuous-duty diesel engines (EUs: C01, C05, C06 & C08) and the continuous-duty diesel water pump (EU: C07). *[40 CFR 60.4207(b), 40 CFR 63.6604(b)]*
- n. The permittee shall maintain the continuous-duty diesel water pump (EU: C07) as follows, unless the manufacturer's specifications are more stringent: *[ATC February 17, 2017, Section IV B, Condition 13 & 40 CFR Part 63, Subpart ZZZZ]*
  - i. Change oil and filter every 1,000 hours of operation or annually, whichever comes first;
  - ii. Inspect air cleaners every 1,000 hours of operation or annually, whichever comes first; and
  - iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
  - iv. The permittee may utilize an oil analysis program described in Part 63.6625(i) to extend the specified oil change requirement, and can petition the Control Officer pursuant to the requirements of 40 CFR Part 63.6(g) for alternative work practices.
- o. During startup periods, the permittee shall minimize the time the continuous-duty diesel water pump (EU: C07) spends at idle, and shall minimize engine startup time to a period needed for appropriate and safe loading of the engine (not to exceed 30 minutes), after which nonstartup emission limitations apply. *[ATC February 17, 2017, Section IV B, Condition 14 & 40 CFR 63.6603(a)]*

### Haul Roads/Disturbed Surfaces/Stockpiles/Fugitive Dust

- p. The permittee shall not track out onto a paved road any mud or dirt that extends 50 feet or more in cumulative length from the point of origin, nor allow any trackout 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 0.25 inches in depth, shall be cleaned of all observable deposits and maintained to eliminate emissions of fugitive dust. *[STL contained in HOO dated September 27, 2013 & ATC February 17, 2017, Section IV B, Condition 18]*

- q. The permittee shall use daily control measures to remove any rock debris along the paved portion of Highway 159 that junctions with the unpaved BLM access roadway leading to the mine, including the designated bike lanes along Highway 159. *[STL contained in HOO dated September 27, 2013]*
- r. The permittee shall control fugitive dust emissions from any disturbed open area or disturbed vacant lot owned or operated by the permittee by paving, applying gravel, applying a dust palliative, or applying water to form a crust. *[STL contained in HOO dated September 27, 2013 & ATC February 17, 2017, Section IV B, Condition 19]*
- s. The permittee shall implement long-term stabilization of disturbed surfaces when the stationary source, or a portion thereof, is to be closed or idled for 30 days or more within 10 days of cessation of active operations. Long-term stabilization includes, but is not limited to, one or more of the following: applying water to form a crust, applying palliatives, applying gravel, paving, denying unauthorized access, or other effective control measure to prevent fugitive dust from becoming airborne. *[MSP September 10, 2013, Section IV B, Condition 5 & STL contained in HOO dated September 27, 2013]*
- t. The permittee shall control PM emissions from any unpaved parking lot owned or operated by the permittee by paving, applying a dust palliative, or using an alternative method approved by the Control Officer, regardless of the number of days of its use. *[ATC February 17, 2017, Section IV B, Condition 21]*
- u. The permittee shall allow no blasting when the National Weather Service forecasts wind gusts above 25 miles per hour (mph), or when DAQ issues a construction advisory or dust advisory. *[MSP September 10, 2013, Section IV B, Condition 6 & STL contained in HOO dated September 27, 2013]*
- v. The permittee shall water down and apply chemical suppressant to unpaved access and mine haul roads and unpaved areas to provide additional dust control. The stabilizations standards and test methods referenced in AQR Subsection 91.2.1.4 and 91.4 will be utilized to monitor the emissions from the subject roadways and frequency as to when additional applications of a chemical suppressant will be applied to the roadway to prevent fugitive dust emissions. *[MSP September 10, 2013, Section IV B, Condition 7 and STL contained in HOO dated September 27, 2013]*
- w. The permittee shall water, for fugitive dust control, the BLM portion of the access haul road to ensure on-going compliance with the AQR, The permittee shall monitor the roadway daily and at any time visible emissions become visible, and employ the stabilization standards and test methods contained in AQR Subsection 91.4 which will determine the frequency of watering the unpaved roadway. *[MSP September 10, 2013, Section IV B, Condition 8 & STL contained in HOO dated September 27, 2013]*
- x. The permittee shall post and enforce a speed limit of 15 mph on the unpaved access haul road from the paved highway to the mine site. *[MSP September 10, 2013, Section IV B, Condition 9 & STL contained in HOO dated September 27, 2013]*

- y. The permittee shall insure that haul trucks, after loading, be covered to ensure that materials will not be deposited on the roadway. This condition applies to trucks regardless of whether they are owned and operated by the permittee. *[MSP September 10, 2013, Section IV B, Condition 10 & STL contained in HOO dated September 27, 2013]*
- z. The permittee shall require haul truck drivers to clean and remove any loose debris from the haul trucks prior to leaving the mine property. This condition applies to trucks regardless of whether they are owned and operated by the permittee. *[MSP September 10, 2013, Section IV B, Condition 11 & STL contained in HOO dated September 27, 2013]*
- aa. The permittee shall water all unpaved haul roads that are in use and stockpiles to the extent that the opacity limits are continually complied with. *[AQR 12.5.2.6(d)]*
- bb. The permittee shall treat unpaved roads located on the stationary source to keep visible emissions within allowable opacity limits. Treatment shall consist of watering, chemical or organic dust suppression, paving, gravelling, or equivalent control measures. *[AQR 12.5.2.6(d)]*
- cc. The permittee shall sweep and/or rinse as necessary all paved roads accessing or located at the site to remove all observable deposits. *[AQR 12.5.2.6(d)]*
- dd. The permittee shall not allow mud or dirt to accumulate on a paved surface where trackout extends greater than 50 feet in cumulative length or accumulates to a depth greater than 0.25 inches. *[AQR 94.14(d)]*
- ee. The permittee shall immediately clean any trackout, including trackout less than 50 feet in length or 0.25 inches in depth, and maintain the surface to eliminate emissions of fugitive dust by removing all accumulations of mud or dirt on curbs, gutters, sidewalks, or paved surfaces that cause visible emissions in excess of the emission limits and standards in this permit. *[AQR 94.14(e)]*
- ff. Except as otherwise required in this section, all trackout shall be cleaned up by the end of the workday or evening shift, regardless of length or depth. *[AQR 94.14(f)]*
- gg. The permittee shall not use blower devices or dry rotary brushes to remove deposited mud, dirt, or rock from a paved surface. Rotary brushes may be used when sufficient water is applied to limit visible emissions consistent with the emissions limits in this permit. *[AQR 94.14(a)(1)-(3), (b) and (c)]*
- hh. For stockpiles over eight feet high, the permittee shall: *[AQR 94.14(g)]*
  - i. Locate the stockpile more than 100 yards from occupied buildings unless approved in advance by the Control Officer.
  - ii. Blade a road to the top of the stockpile to allow water truck access, or use another means to provide equally effective dust control at the top of the stockpile.
- ii. The permittee shall implement one or more of the following to maintain fugitive dust control on all disturbed soils to the extent necessary to pass the Drop Ball Test described in AQR 94.15.5: *[AQR 94.12(b)]*

- i. Maintain in a sufficiently damp condition to prevent loose particles of soil from becoming dislodged;
  - ii. Crust over by application of water;
  - iii. Completely cover with clean gravel;
  - iv. Treat with a dust suppressant; or
  - v. Treat using another method approved in advance by the Control Officer.
- jj. The permittee shall not allow unpaved parking lots or storage areas of more than 5,000 square feet to exceed the following, as determined by Section 92.6.3, except in areas on which clean gravel has been applied. The permittee shall demonstrate compliance as required by the Control Officer. *[AQR 92.4(a)]*
- i. 0.33 oz/ft<sup>2</sup> silt loading; or
  - ii. 6% silt content.
- kk. The permittee shall control fugitive dust emissions from unpaved parking lots and storage areas of more than 5,000 feet by: *[AQR 92.3.4]*
- i. Paving, as defined in AQR 0;
  - ii. Applying alternate asphalt paving, as defined in AQR 92.2;
  - iii. Uniformly applying and maintaining clean gravel to a depth of two inches; or
  - iv. Applying and maintaining an alternative control measure with prior written approval from the Control Officer.
- ll. Control measures outlined in this permit, and other measures needed for maintaining dust control, shall be implemented 24 hours a day, 7 days a week. *[AQR 94.13(b)]*

Other

- mm. 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. *[MSP September 10, 2013, Section IV B, Condition 17; AQR 40; AQR 43]*
- nn. The permittee shall not cause or allow fugitive dust to become airborne without taking reasonable precautions. *[MSP September 10, 2013, Section IV B, Condition 1 & STL contained in HOO dated September 27, 2013]*
- oo. 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]*
- pp. The permittee shall implement control measures when handling, transporting, or storing any material to prevent the release of a dust plume that extends 100 yards from the point of origin or beyond the lot line of the property on which the emissions

- originate, horizontally or vertically, whichever is less. *[MSP September 10, 2013, Section IV B, Condition 4 & STL contained in HOO dated September 27, 2013]*
- qq. The permittee shall have a water truck available and utilized during all drilling and blasting operations. *[STL contained in HOO dated September 27, 2013]*
- rr. The permittee shall water the disturbed soils to form a crust immediately following blasts and safety clearance. *[STL contained in HOO dated September 27, 2013]*

## **D. MONITORING**

### Visible Emissions

1. The permittee shall conduct two daily visual emissions checks for visible emissions using EPA Test Method 22 on all emissions units while in operation. *[HOO dated August 15, 2016 & ATC February 17, 2017, Section V A, Condition 1]*
2. If the permittee, during the visible emissions check, does not see any plume that, on an instantaneous basis, appears to exceed the opacity standard, then the observer shall keep a record of the name of the observer, the date on which the observation was made, the location, and the results of the observation. *[MSP September 10, 2013, Section IV C, Condition 2]*
3. If the permittee sees a plume that, on an instantaneous basis, appears to exceed the opacity standard, the permittee shall: *[MSP September 10, 2013, Section IV C, Condition 3]*
  - a. Take immediate action to correct causes of fugitive/stack emissions that appear to exceed allowable opacity limits; and
  - b. Have a certified observer take an EPA Method 9 observation of the plume and record the results, and take immediate action to correct causes of fugitive emissions in excess of allowable opacity limits in accordance with 40 CFR Part 60, Appendix A-4, "Test Methods 6 through 10B: Method 9—Visual Determination of the Opacity of Emissions from Stationary Sources."
4. Visible emissions checks do not require a certified observer, except where visible emissions appear to exceed the allowable opacity limit and exceed 30 seconds in duration, and an EPA Method 9 observation is made to establish it does not exceed the standard. *[MSP September 10, 2013, Section IV C, Condition 4]*
5. The permittee shall have a certified opacity reader on-site at all times the facility is operating. *[MSP September 10, 2013, Section IV C, Condition 13, AQR 12.5.2.6(d) & AQR 12.5.2.8]*

### Gypsum Processing/Stockpiles/Haul Road

6. The permittee shall visually inspect the water spray system daily at all emission units controlled through water suppression, and monitor its effectiveness. Inspections shall include, but not be limited to, flow rates, leaks, and nozzle conditions, as applicable. The permittee shall either replace ineffective spray nozzles immediately or shut down the subject processing equipment until repairs can be completed to the water spray suppression system, as applicable. *[STL contained in HOO dated September 27, 2013 & ATC February 17, 2017, Section V A, Condition 6]*

7. The permittee shall monitor daily hours of operation. *[ATC February 17, 2017, Section V A, Condition 7]*
8. The permittee shall monitor daily the throughput of all mineral products processed in the gypsum in tonnage, and calculate the total on a monthly basis. *[ATC February 17, 2017, Section V A, Condition 8]*
9. The permittee shall monitor the number of blasts on a monthly basis (EU: A001). *[Significant Permit revision application received August 18, 2018]*
10. The permittee shall monitor the area blasted per each blast and record it for inclusion in the monthly total blasting area (EU: A001). *[ATC February 17, 2017, Section V A, Condition 9]*
11. The permittee shall monitor the amount of ANFO used during each blast, and calculate the total on monthly basis (EU: A001). *[ATC February 17, 2017, Section V A, Condition 10]*
12. The permittee shall monitor the production of overburden in tonnage, and calculate it on a monthly basis (EU: A002). *[Part 70 Permit application received August 19, 2016]*
13. The permittee shall monitor the number of holes drilled for blast on a monthly basis (EU: A003). *[Part 70 Permit application received August 19, 2016]*
14. The permittee shall monitor the total acreage of stockpiles on a monthly basis (EU: A32). *[MSP September 10, 2013, Section IV C, Condition 10]*
15. The permittee shall monitor daily the number of VMT traveled on BLM roads by haul trucks entering and leaving, and calculate the total on a monthly basis (EU: B01). *[ATC February 17, 2017, Section V A, Condition 11]*
16. The permittee shall monitor daily the number of VMT on-site by haul trucks entering and leaving, and calculate the total on a monthly basis (EU: B02). *[ATC February 17, 2017, Section V A, Condition 12]*
17. The permittee shall monitor daily the number of VMT traveled for overburden operations by haul trucks entering and leaving, and calculate the total on a monthly basis (EU: B03). *[ATC February 17, 2017, Section V A, Condition 13]*
18. The permittee shall monitor daily the number of VMT traveled for material hauling by haul trucks entering and leaving, and calculate the total on a monthly basis (EU: B04). *[Significant Permit revision to the Part 70 Permit received August 18, 2018]*
19. The permittee shall monitor daily the total truck loading for shipping of all mineral products in tonnage, and calculate the total on a monthly basis (EUs: E01, E02, E03, E04, F01 & F02).
20. The permittee shall have an adequate number of water trucks on-site at all times to control dust emissions from the site, and use them constantly to control dust emissions. *[STL contained in HOO dated September 27, 2013]*
21. The permittee shall monitor the daily operation of water trucks for the following: *[HOO dated August 15, 2016 and ATC February 17, 2017, Section V A, Condition 15]*

- a. Amount of water used.
- b. Maintenance of water trucks.

### Engines/Water Pump

22. The permittee shall operate each continuous-duty engine and continuous-duty diesel water pump with a nonresettable hour meter, monitor the hours of operation of each engine (EUs: C01, C05, C06 & C08) and continuous-duty diesel water pump (EU: C07), and calculate the hours of operation of each engine and water pump per month. *[ATC February 17, 2017, Section V A, Condition 16]*
23. The permittee shall monitor the sulfur content, and cetane index or aromatic content of the fuel burned in each continuous-duty engine (EUs: C01, C05, C06 & C08) and continuous-duty diesel water pump (EU: C07) by retaining a copy of vendor fuel specifications. *[40 CFR 60.4207(b), 40 CFR 63.6604(b)]*

### Baghouse (CDs: D01 and D02)

24. The permittee shall conduct daily monitoring of the pressure drop across each baghouse with the installation and operation of a pressure differential (Magnehelic) gauge per manufacturer's specifications. Gauges shall be installed where they are accessible and can be easily read. *[ATC February 17, 2017, Section V A, Condition 17]*
25. The permittee shall visually inspect the baghouse interior at least monthly for air leaks. Defective baghouse compartments shall be sealed off and repairs completed within five working days of the discovery of the malfunction. If the malfunction renders the baghouse ineffective in controlling particulate emissions, material processing shall cease until repairs to the baghouse are completed. *[ATC February 17, 2017, Section V A, Condition 18]*
26. The permittee shall have a standard operating procedures (SOP) manual for the baghouses. The procedures specified in the manual for maintenance shall, at a minimum, include a preventative maintenance schedule that is consistent with the baghouse manufacturer's instructions for routine and long-term maintenance. *[ATC February 17, 2017, Section V A, Condition 19]*
27. The permittee shall conduct daily visual observations of the baghouse stack discharges to verify that visible emissions are not present in excess of allowable opacity limits. If they are, the permittee shall cease the operation(s) producing the emissions until the problem is corrected. *[ATC February 17, 2017, Section V A, Condition 20 & 40 CFR 60.674(c)]*

### Other

28. The permittee shall demonstrate compliance with the minimum moisture control requirement by conducting weekly moisture testing and recording the results on materials less than 0.25" in diameter as follows: *[HOO dated August 15, 2016 & ATC February 17, 2017, Section V A, Conditions 21(a) and (b)(1-7)]*
  - a. Testing shall be in accordance with Section 17 of ASTM Method C471M16a, "Standard Test Method for Chemical Analysis of Gypsum and Gypsum Products"; and
  - b. Samples for moisture testing shall be retrieved from the following locations:
    - i. 3<sup>rd</sup> belt conveyor after the West Screen for 2" product



- ii. 3<sup>rd</sup> belt conveyor after the West Screen for 1/8" product
  - iii. Reject stockpile
  - iv. 2" stockpile
  - v. 1/8" stockpile
  - vi. Direct loading from the overburden removal
  - vii. Truck loading conveyor (EU: E02 or E04).
29. The permittee shall also use a third party to conduct monthly moisture testing on three of the seven sample locations, provided that all seven of the sampling locations are tested by the third-party lab every three months. *[ATC February 17, 2017, Section V A, Condition 22]*
30. The permittee shall allow representatives of Clark County to conduct moisture testing. *[ATC February 17, 2017, Section V A, Condition 23]*
31. The Control Officer may require additional moisture testing when operating conditions appear inadequate to demonstrate compliance with the emissions and/or limitations in this permit. *[ATC February 17, 2017, Section V A, Condition 24 & AQR 4.5]*
32. The permittee shall submit the weekly and monthly moisture results, along with the semi-annual summary report, to the Control Officer as specified in Section III-F of this OP. *[ATC February 17, 2017, Section V A, Condition 25]*
33. The permittee shall have an SOP manual for the moisture testing that meets the approval of the Control Officer. The procedures specified in the manual for maintenance shall, at a minimum, include a preventative maintenance schedule that is consistent with this permit and the manufacturer's instructions for routine and long-term maintenance. *[ATC February 17, 2017, Section V A, Condition 26]*

## **E. TESTING**

1. All performance testing is subject to 40 CFR Part 60.8 and *Clark County Department of Air Quality Guideline for Source Testing (2/21/2019)*. Performance testing shall be the instrument for determining initial and subsequent compliance with the emission limitations set forth in this permit. *[MSP September 10, 2013, Section IV D, Condition 3 and AQR 12.5.2.8(a)]*
2. The permittee shall conduct initial performance testing. Initial testing was conducted on May 18–19, 2017, for baghouse CD: D02 and June 7–8, 2017, for baghouse CD: D01 to demonstrate compliance with the grain-loading standard in 40 CFR Part 60, Subpart OOO, and with the mass emission rates (pounds per hour). *[ATC February 17, 2017, Section V B, Condition 2 and 40 CFR 60.672 and AQR 12.5.2.8(a)]*
3. The permittee shall conduct initial performance testing of opacity for the new belt conveyors (EUs: A02, A04, A06, A09, A11, & A12), and a facility-wide opacity test. Initial testing was conducted on May 26, 2017, and June 7, 2017, to demonstrate compliance with the 40 CFR Part 60, Subpart OOO standard of 7% opacity and the local opacity standard of 20% (EUs: A01 & A32). *[ATC February 17, 2017, Section V B, Condition 3; 40 CFR 60.672; AQR 26.1 and AQR 12.5.2.8(a)]*

4. The permittee shall conduct subsequent performance testing according to the following conditions: *[ATC February 17, 2017, Section V B, Condition 4 and AQR 12.5.2.8(a)]*
  - a. Performance tests of the facility for opacity shall be conducted annually within 45 days of the anniversary date of the previous successful performance test.
  - b. Performance tests of the baghouses for grain loading standard and mass emission rates (pounds per hour) shall be conducted every five years within 90 days of the anniversary date of the previous successful performance test.
5. After completion of three consecutive compliant performance tests for opacity, the permittee can send the Control Officer a written request to change the performance testing frequency. *[ATC February 17, 2017, Section V B, Condition 5 and AQR 12.5.2.8(a)]*
6. The permittee shall utilize the performance testing methodologies for individual emission units indicated in Table III-E-1. *[ATC February 17, 2017, Section V B, Condition 6 and AQR 12.5.2.8(a)]*

**Table III-E-1: Performance Testing Requirements**

Device ID	Test Point	Pollutant	Test Method	Parameter	Frequency
CDs: D01 and D02	Baghouse Exhaust Outlet Stack	PM/PM <sub>10</sub>	5 or 17	g/dscm (gr/dscf)	5 years
CDs: D01 and D02	Baghouse Exhaust Outlet Stack	PM/PM <sub>10</sub>	5 or 17	lbs/hr	5 years
CDs: D01 and D02	Baghouse Exhaust Outlet Stack	PM/PM <sub>10</sub>	9	Opacity	Annual
Facility-wide except for engines/water pump	Conveyors, VGF, stackers, stockpiles	PM/PM <sub>10</sub>	9	Opacity	Annual

7. The Control Officer will consider approving the permittee's request for alternative performance test methods if proposed in writing in the performance test protocols. *[MSP September 10, 2013, Section IV D, Condition 5 and 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. *[MSP September 10, 2013, Section IV D, Condition 7 & AQR 10.1 and AQR 12.5.2.8(a)]*
9. The Control Officer may require additional performance testing when operating conditions appear to be inadequate to demonstrate compliance with the emissions and/or limitations in this permit. *[MSP September 10, 2013, Section IV D, Condition 8 & AQR 4.5; and AQR 12.5.2.8(a)]*

**F. RECORDKEEPING**

1. All records logs, etc. shall be made available to the Control Officer during regular business hours. *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
2. 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) & AQR 12.5.2.8]*

3. 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. The permittee shall create and maintain the following records, at a minimum, 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. This section is for records that do not need to be reported semiannually. *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
  - a. Dates and times when visible emissions checks and observations were made, and the corrective steps taken to bring opacity into compliance;
  - b. Daily hours of operation;
  - c. Daily production of gypsum materials processed;
  - d. Daily shipment of gypsum materials;
  - e. Daily production of the overburden operations;
  - f. Monthly number of holes drilled;
  - g. Daily water usage for water trucks;
  - h. Daily water applied to the gypsum process;
  - i. Maintenance on water trucks;
  - j. Dust control measures applied to unpaved roads;
  - k. Dust control measures applied to paved roads;
  - l. Daily baghouse differential pressure drop readings;
  - m. Equipment inspections, maintenance, and repairs;
  - n. Monthly control device inspections, maintenance, and repairs;
  - o. Maintenance on the spray bars and/or water suppression systems;
  - p. Monthly amount of dust palliative applied;
  - q. Sulfur content, and cetane index or aromatic content of diesel fuel used to power the continuous-duty diesel engines (EUs: C01, C05, C06, & C08) and continuous-duty diesel water pump (EU: C07) as certified by the supplier;
  - r. Manufacturer specification sheets for the continuous-duty diesel engines (EUs: C01, C05, C06, & C08) and continuous-duty diesel water pump (EU: C07); and
  - s. All performance test results.

5. The permittee shall create and maintain the following records, at a minimum, 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. This section is for records that shall be reported semiannually, as required by this permit. [AQR 12.5.2.6(d) & AQR 12.5.2.8]
- a. Monthly hourly operational logs;
  - b. Throughput of gypsum material processed monthly and consecutive 12-month total;
  - c. Number of blasts monthly and consecutive 12-month total (EU: A001);
  - d. Amount of ANFO for blasting used monthly and consecutive 12-month total (EU: A001);
  - e. Square footage of blasting area per blast and consecutive 12-month total (EU: A001);
  - f. Production of overburden material processed monthly and consecutive 12-month total (EU: A002);
  - g. Number of holes drilled for blasting each month and consecutive 12-month total (EU: A003);
  - h. Monthly VMT on the BLM unpaved haul road and consecutive 12-month total (EU: B01);
  - i. Monthly VMT on the on-site paved haul roads and consecutive 12-month total (EU: B02);
  - j. Monthly VMT on the overburden paved haul roads and consecutive 12-month total (EU: B03);
  - k. Monthly VMT on the material hauling unpaved haul roads and consecutive 12-month total (EU: B04);
  - l. Monthly hours of operation of each continuous-duty diesel engine/water pump and consecutive 12-month total (EUs: C01, C05, C06, C07, & C08);
  - m. Monthly shipment of gypsum material and consecutive 12-month total (EUs: E01, E02, E03, E04, F01 & F02);
  - n. Weekly and monthly moisture sampling results (reported as required in Section III-D of this OP);
  - o. Deviations from permit requirements that result in excess emissions (reported as required in Section II-D of this OP);
  - p. Deviations from permit requirements that do not result in excess emissions; and
  - q. Calculation of annual emissions for each emission unit and for the entire source (reported annually).

**G. REPORTING**

1. All report submissions shall be addressed to the attention of the Control Officer. *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
2. All reports shall contain the following: *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
  - a. A certification statement on the first page, e.g., “I certify that, based on information and belief formed after reasonable inquiry, the statements contained in this document are true, accurate and complete.” (A sample form is available from DAQ.)
  - b. A certification signature from a responsible official of the company and the date of certification.
3. The permittee shall submit semiannual monitoring reports to DAQ. *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
4. The following requirements apply to semiannual reports: *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*
  - a. The report shall include each item listed in Section III-F-5 of this OP, as indicated.
  - 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.
5. Regardless of the date of issuance of this OP, the source shall comply with the schedule for report submissions outlined in Table III-G-1. *[AQR 12.5.2.6(d) & AQR 12.5.2.8]*

**Table III-G-1: 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
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>

Required Report	Applicable Period	Due Date
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 Saturday, Sunday, or federal or Nevada holiday, 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.

- 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]

## H. MITIGATION

The source has no federal offset requirements. [AQR 59.1.1]

## IV. OTHER REQUIREMENTS

The permittee shall not use, sell, or offer for sale any fluid as a substitute material for any motor vehicle, residential, commercial, or industrial air conditioning system, refrigerator freezer unit, or other cooling or heating device designated to use a chlorofluorocarbon or hydrochlorofluorocarbon compound as a working fluid, unless such fluid has been approved for sale in such use by the EPA Administrator. The permittee shall keep records of all paperwork relevant to the applicable requirements of 40 CFR Part 82 on-site. [40 CFR Part 82]

## V. PERMIT SHIELD

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

## ATTACHMENT 1—APPLICABLE REGULATIONS

### Requirements Specifically Identified as Applicable

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

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

Citation	Title
AQR 0	“Definitions”
AQR 4	“Control Officer”
AQR 5	“Interference with Control Officer”
AQR 8	“Persons Liable for Penalties – Punishment: Defense”
AQR 9	“Civil Penalties”

Citation	Title
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 Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines"
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)(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"
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.

**Table A-2: Applicable CFRs**

Citation	Title
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	"Standards of Performance for Nonmetallic Mineral Processing Plants"
40 CFR Part 60, Subpart IIII	"Standards of Performance for Stationary Compression Ignition Internal Combustion Engines"
40 CFR Part 60	Appendix A, Method 9 or equivalent, (Opacity)
40 CFR Part 60, Appendix A-3	"Test Methods 4 through 5I" (PM in g/dscm)

Citation	Title
40 CFR Part 60, Appendix A-4	"Test Methods 6 through 10B" (opacity)
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 70	"State Operating Permit Programs"
40 CFR Part 82	"Protection of Stratospheric Ozone"