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FINAL ACTION REPORT
Aggregate Industries Source 372
Authority to Construct (ATC) and
Initial Title V Operating Permit Issuance

Public Notice: Las Vegas Review-Journal August 6, 2012
Public Comment: August 7, 2012, to September 5, 2012
Comments Received: EPA, Region IX
Public Hearing: Not Requested

Copies of comments received and responses to those comments are part of this final action report. All responders shall receive an electronic copy of this report, the final ATC, and the final Technical Support Document (TSD).

COMMENTS RECEIVED FROM EPA, REGION IX, and Air Quality's response:

Comment 1: GHG Emissions:

EPA stated that all permit actions must quantify Greenhouse Gas (GHG) emissions at a particular source.

Air Quality Response: GHG emissions are now quantified by emission unit. Table V-B-1 was added to the TSD of the Title V Operating Permit.

Comment 2: Compliance Assurance Monitoring (CAM) Applicability:

EPA requested that Air Quality clarify the CAM applicability of all criteria pollutants, not just PM₁₀.

Air Quality Response: Language was added to both the TSD and the Operating Permit clarifying that only uncontrolled PM₁₀ emissions from the Astec Drum Mixer (Emission Unit: D014) are above the major source threshold and therefore subject to CAM.

Comment 3: New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) citations in the Operating Permit:

EPA requested that Air Quality specify the paragraph in the NSPS or NESHAP that a permit requirement is used as the basis.

Air Quality Response: Citations were updated in the Authority to Construct, Operating Permit, and TSDs as requested by EPA. These pertained to 40 CFR 60 Subparts I, OOO, and IIII and 40 CFR 63 Subpart ZZZZ.

Comment 4: New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) citations in the Operating Permit:

EPA requested that the ATC and Operating Permit be more specific when incorporating federal standards by reference. Details may be referenced, but the Operating Permit should state what the Permittee is required to do to demonstrate compliance with applicable federal standards.

Air Quality Response: Conditions were updated in the ATC and Operating Permit as requested by EPA. Specific test methods, recordkeeping, and reporting requirements were added to the permit.

OTHER CHANGES TO THE PART 70 OPERATING PERMIT

Citations for each PTE table have been included in the permit. The citations reference the ATC being issued at the same time as the Part 70 Operating Permit, since the emission units numbers and organization of the equipment has changed since the previous permitting action, this is determined to be the most accurate citation.

Tables III-A-19 and III-A-28 were omitted from the draft Part 70 Operating Permit and have been included in the final permit. These tables specify the emission standards for emissions units A123, MM06, and MM08 (continuous duty diesel engines) found in 40 CFR 60, Subpart IIII. The table numbers of subsequent tables have been adjusted accordingly.