

TECHNICAL SUPPORT DOCUMENT

TECHNICAL INFORMATION PRESENTED IN REVIEW OF AN
APPLICATION FOR A PART 70 OPERATING PERMIT
REVISION

SUBMITTED BY

CERTAINEED CORPORATION

for

CERTAINEED GYPSUM MANUFACTURING, INC.

Source: 4

SIC Code 3275: Gypsum Manufacturing
NASIC Code 327420: Gypsum Products Manufacturing



Clark County
Department of Air Quality and Environmental Management
Permitting Section

November, 2011

EXECUTIVE SUMMARY

CertainTeed Gypsum Manufacturing, Inc. (CGM) is located one mile east of Blue Diamond, Nevada, in the Las Vegas Valley airshed, hydrographic basin number 212. Hydrographic basin 212 is nonattainment for PM₁₀, and ozone, and attainment for all other regulated air pollutants.

CGM operates a gypsum wallboard manufacturing facility. All manufacturing and support processes at the site are grouped under the Standard Industrial Classification 3275: Gypsum Products (NAICS 327420: Gypsum Products Manufacturing). CGM processes gypsum ore and manufactures wallboard. The emission units at the source include rock crushing and screening, transport of raw rock, mill operations, plaster operations, and wallboard manufacturing. The potential emissions for the source are shown in the table below.

Table 1: Source-wide PTE (tons per year)

PM₁₀	PM_{2.5}	NO_x	CO	SO_x	VOC	HAP
57.43	57.43	90.49	121.11	0.87	42.68	2.64

Clark County Department of Air Quality and Environmental Management (DAQEM) has delegated authority to implement the requirement of the Part 70 operating permit program. Operating permit issued to CGM on November 3, 2009 identified this source as a major source for NO_x and CO. DAQEM received a Part 70 significant revision application on March 15, 2011.

This Technical Support Document (TSD) accompanies the proposed Part 70 Operating Permit for CertainTeed Gypsum Manufacturing, Inc.

TABLE OF CONTENTS

- I. ACRONYMS 4**
- II. SOURCE INFORMATION..... 5**
 - A. General 5**
 - B. Description of Process..... 5**
 - C. Permitting History 5**
 - D. Operating Scenario..... 7**
- III. EMISSIONS INFORMATION 8**
 - A. Source-wide Potential to Emit..... 8**
 - B. Control Technology 8**
 - C. Emission Units and PTE 8**
 - D. Performance Testing and Emissions Monitoring..... 9**
 - E. Emissions Monitoring 11**
- IV. REGULATORY REVIEW 11**
 - A. Local Regulatory Requirements 11**
 - B. Federally Applicable Regulations..... 11**
- V. COMPLIANCE..... 13**
 - A. Compliance Certification 13**

I. ACRONYMS

Table I-1: List of Acronyms

Acronym	Term
AQR	Clark County Air Quality Regulations
ATC	Authority to Construct
ATC/OP	Authority to Construct/Operating Permit
BCC	Clark County Board of County Commissioners
BHP	Brake Horse Power
CAO	Field Corrective Action Order
CE	Control Efficiency
CF	Control Factor
CFR	United States Code of Federal Regulations
CO	Carbon Monoxide
CPI	Urban Consumer Price Index
DAQEM	Clark County Department of Air Quality & Environmental Management
EF	Emission Factor
EPA	United States Environmental Protection Agency
EU	Emission Unit
HAP	Hazardous Air Pollutant
HP	Horse Power
NAC	Nevada Administrative Code
NAICS	North American Industry Classification System
NEI	Net Emission Increase
NO _x	Nitrogen Oxides
NOV	Notice of Violation
NRS	Nevada Revised Statutes
NSPS	New Source Performance Standards
NSR	New Source Review
OP	Operating Permit
PEP	Potential to Emit Particulate
PM _{2.5}	Particulate Matter less than 2.5 microns
PM ₁₀	Particulate Matter less than 10 microns
ppm	Parts per Million
PSD	Prevention of Significant Deterioration
PTE	Potential to Emit
scf	Standard Cubic Feet
SCC	Source Classification Codes
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO _x	Sulfur Oxides
TCS	Toxic Chemical Substance
TSD	Technical Support Document
VOC	Volatile Organic Compound

II. SOURCE INFORMATION

A. General

Permittee	CertainTeed Gypsum Manufacturing, Inc.
Mailing Address	HCR 89033, Box 2900, Las Vegas, NV 89161
Contacts	Doug Doyle, Mill Manager
Phone Number	(702) 875-4111 X 116
Fax Number	(702) 875-4213
Source Location	One mile east of Blue Diamond, Nevada
Hydrographic Area	212
Township, Range, Section	T22S, R59E, Sections 4, 5, 8, 9
SIC Code	SIC 3275: Gypsum Products
NAICS Code	NAICS 327420: Gypsum Products Manufacturing

B. Description of Process

CertainTeed Gypsum Manufacturing, Inc. (CGM) operates a gypsum wallboard manufacturing facility in Las Vegas, Nevada. The manufacturing process pulverizes and dries gypsum rock ($\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$) to produce landplaster. The landplaster is calcinated to remove most of the chemically bound water to produce stucco ($\text{CaSO}_4 \cdot \frac{1}{2}\text{H}_2\text{O}$), the principal component in gypsum wallboard. The major parts of the process include: truck unloading station, discharge terminal, CP Mill, Roller Mills, plaster kettles, plaster operations, stucco bins, wallboard manufacturing, accelerator process, and wallboard recycling. A detailed process description is included in the TSD of Part 70 Operating Permit issued on November 3, 2009.

C. Permitting History

The CGM is regulated by Clark County Department of Air Quality and Environmental Management (DAQEM), and has a Title V operating permit. The facility is a major source for NO_x and CO. A renewed Part 70 OP was issued on November 3, 2009 and subsequent NSR permit modification was ATC Modification 7, Revision 0, was issued on April 26, 2010.

Table II-C-1: NSR Permits Issued to CGM after November 3, 2009

Date Issued	Permit Number	Description
4/26/2010	ATC Modification 7, Revision 0	Authority to Construct - The modification of an alternate wallboard recycling system.

On August 20, 2010, the source applied for an ATC to add of two unpermitted emission units: one stacker conveyer (EU: E.1) and one end trim baghouse emergency dump hopper (EU: E.9.2). In addition, the source identified two emission units that needed modification: conveyor drop to rock silos (EU: E.8) and end saw dust drop to conveyor (EU: E.9.1). All emission units were permitted to operate 8,760 hours per year. DAQEM incorporated the proposed changes directly into the Part 70 OP.

On March 15, 2011, DAQEM received application for significant revision of Part 70 OP. The source PM_{10} PTE was increased by 2.84 tons per year, due to the changes associated with NSR ATC 4, Modification 7, Revision 0 (04/26/2010). However, the equipment included in the ATC, Modification 7 has been largely dismantled and electrical power supply was removed. Consequently, the source asked for the removal of these emission units from the permit.

Additionally, emission units list has been revised and few emission units have been added to correct an oversight in previous permits. The proposed changes are outlined in Table II-C-2

Table II-C-2: Summary of Proposed Permit Revisions

Page	Condition	Description	DAQEM Response
1	N/A	Revised Responsible Official name and location zip codes.	Accepted
2	N/A	PM ₁₀ PTE revised to reflect permit changes.	Accepted
9	N/A	Reference to NSR ATC 4, Modification 6, Revision 0, (05/29/2008) changed to most recent NSR ATC 4, Modification 7, Revision 0, (04/26/2010)	Accepted
9	N/A	Table III-1 PM ₁₀ PTE revised to reflect changes made within permit conditions.	Accepted
9	N/A	EU: E.1 added to Table IV-2-a. This is an existing emission unit that has been added to correct an oversight in previous permits.	Accepted
10	N/A	EU: E.9.2 added to Table IV-A-2-a. EUs: E.8 and E9.1 revised. These are existing emission units that have been updated to correct an oversight in previous permits.	Accepted
10	N/A	The control method for EUs: F.5.1; F.5.2; F.6.1; and F.6.3 in Table IV-A-3-a corrected to show BH09 instead BH04.	Accepted
11	N/A	The control method for EUs: G.1 through G.4 in Table IV-A-4-a corrected to show BH09 instead BH10-16. The control method for EUs: G.11 through G.16 in Table IV-A-4-a corrected to show BH17 instead BH10-16.	Accepted
13	N/A	The control method for EUs in Table IV-A-6 corrected to show BH23 instead BH16.	Accepted
14	N/A	EU: J.4 in Table IV-A-7 corrected to show 4 Radial Center Saws,	Accepted
15	N/A	EUs: L.1, L.10, L.18, and L.19 in Table IV-9-a revised. EUs: L.11, L.12, L.21, and L.22 removed. These are existing emission units that have been updated to correct an oversight in previous permits.	Accepted
16	N/A	Reference to NSR ATC 4, Modification 6, Revision 0, (05/29/2008) changed to most recent NSR ATC 4, Modification 7, Revision 0, (04/26/2010) in Section IV.B.	Accepted
16	N/A	Table IV-A-11 revised per NSR ATC 4, Modification 7, Revision 0, (04/26/2010). This equipment has been largely dismantled (including building enclosure). The electrical supply has been also removed. The source wants to remove this equipment from the permit.	Accepted
16	N/A	The gal/year in Table IV-A-14 corrected to 36,000 per condition IV.B.2.f.	Accepted
17	IV.B.1.b	Added words "and bin vents".	Accepted
17	IV.B.1.c	Various edits to clarify which baghouses and bin vents are subject to 40 CFR 60, Subpart 000.	Accepted
17	IV.B.1.b	Deleted condition since 40 CFR 60, Subpart UUU does not apply to the kettles.	Not accepted, due to applicability in 40 CFR 60.730
17	IV.B.1	No edits were made but the permit may require additional conditions in this section to address the requirements for fugitive emissions contained in 40 CFR 60, Subpart 000.	Revised.
18	IV.B.3.b,c,e	Added words "and bin vents"	Accepted

Page	Condition	Description	DAQEM Response
19	IV.B.3.p	This requirement needs another reference since the NSPS regulations cited do not require that only natural gas has to be burned.	Accepted
21	IV.C.7	Added "or equivalent device". CertainTeed uses water tube manometers to monitor baghouse pressure drop.	Accepted
22	IV.C.9.b	Added "If a magnehelic gauge is used", to the QA/QC section of Table IV-C-1 since simple water tube manometers do not require calibration.	Accepted
22-24	IV.D.3	Table IV-D-1 revised to delete unnecessary performance testing requirements that were required to comply with AQR 34 which no longer in effect.	Not accepted source needs to conduct NSR analysis
24	IV.E.1.f	The words "or weekly" added. Hours are recorded during maintenance inspections and are sufficient to produce monthly summary.	Accepted
26	IV.F.5	This condition appears to be no longer applicable since surveys mentioned in the condition are not longer sent. Some revisions to permit appear necessary to incorporate AQR 52 conditions.	Revised.
29	IV.2	Various edits to the list of EUs controlled by each baghouse or bin vent based on the corrections to Table IV-A-3-a, Table IV-A-4-a, Table IV-A-6, and Table IV-A-9-a,	Accepted
29	IV.2	S/N for BH17 corrected.	Accepted
29	IV.2	S/N for BH21 corrected.	Accepted
29	IV.2	BH25 deleted per NSR ATC 4, Modification 7, Revision 0 (04/26/10)	Accepted

The source asked for removal of requirements of 40 CFR 60, Subpart UUU reasoning that the regulation does not apply to kettle calciners. Pursuant 40 CFR 60.730, the provisions of this subpart apply to each calciner and dryer at a mineral processing plant that commences construction, modification, or reconstruction after April 23, 1986. Furthermore, calciner means the equipment used to remove combined (chemically bound) water and/or gases from mineral material through direct or indirect heating. Dryer means the equipment used to remove uncombined (free) water from mineral material through direct or indirect heating. Based on the above provisions DAQEM concludes that 40 CFR 60, Subpart UUU applies to facility kettle calciners.

The source asked for removal of the performance testing requirements reasoning that the AQR 34 is no longer in effect. DAQEM will consider changes in performance testing conditions after the source will conduct a NSR review of the affected permit conditions and will propose new compliance demonstration measures for the affected units.

D. Operating Scenario

CGM is a producer of gypsum wallboard. The manufacturing process pulverizes and dries gypsum rock ($\text{CaSO}_4 \cdot 2\text{H}_2\text{O}$) to produce landplaster. The landplaster is calcinated to remove most of the chemically bound water to produce stucco ($\text{CaSO}_4 \cdot \frac{1}{2}\text{H}_2\text{O}$) the principal component in gypsum wallboard.

III. EMISSIONS INFORMATION

A. Source-wide Potential to Emit

Table III-A-1: Source-wide PTE (tons per year)

Pollutant	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
PTE Totals	57.43	57.43	90.49	121.11	0.87	42.68
Major Source Thresholds	70	50³	70³	100	100	25²

¹The total PTE for the source includes the worst-case emissions between the primary and alternative operating scenarios.

²25 tons for combination of all HAPs (no single HAP exceeds 10 tons).

³The major source threshold for NO_x was 50 tpy and CO was 70 tpy when the Operating permit was issued on November 3, 2009. A new evaluation is not triggered during this revision and therefore, the thresholds are retained.

B. Control Technology

The particulate matter (PM₁₀) is a dominant pollutant in gypsum (CaSO₄·2H₂O) processing plants. The major sources of PM₁₀ include rotary ore dryers, grinding mills, calciners, and board end sawing operations. Other sources of PM₁₀ emissions in gypsum plants are primary and secondary crushers, screens, stockpiles, and roads. Gypsum ore is usually crushed and stockpiled near a plant. As needed, the stockpiled ore is further crushed and screened to about 2 inches in diameter. If the moisture content of the ore is greater than 0.5 percent the ore must be dried. To produce plasters or wallboard, gypsum must be partially dehydrated or calcined to produce calcium sulfate semihydrate (CaSO₄·½H₂O), commonly called stucco.

Stacker Conveyor: The PM₁₀ emissions from the stacker conveyor (EU: E.1) are controlled with 0.5 percent moisture, which is equivalent to 82 percent control efficiency. Moisture of the processes material is maintained by spraying water on the material before and during processing. Higher moisture content is technologically infeasible since the processed material is used in the wallboard manufacturing. The 0.5 percent moisture is consistent with BACT for PM₁₀ control during similar processes.

Conveyor Drop to rock silos: Application of baghouse with 99.5 percent control efficiency was selected as a top control technology. This is consistent with current BACT for PM₁₀ for similar sources.

C. Emission Units and PTE

Tables III-C-1 and III-C-2 summarize the PTE for added or revised emission units. The emission factors are the same as those used for similar emission units in the current permit. Actual and allowable annual emissions shall not exceed the calculated PTE for each emission unit.

Table III-C-1: List of New and Revised Emission Units

EU	Description	Rating	Make	Model #	Serial #
E.1	Stacker Conveyor	100 tons/hr	N/A	N/A	N/A
E.8	Conveyor Drop (to rock silos)	65 tons/hr	N/A	N/A	N/A
E.9.1	End Saw Dust Drop to Conveyor	0.5 tons/hr	N/A	N/A	N/A
E.9.2	End Trim Emergency Dump	0.5 tons/hr	N/A	N/A	N/A
L.1	Recycle Stockpile	8.0 acre	N/A	N/A	N/A
L.10	Recycle Stockpile	0.05 acre	N/A	N/A	N/A
L.18	Bucket Elevator to Silos	10 tons/hr	N/A	N/A	N/A

EU	Description	Rating	Make	Model #	Serial #
L.19	Screw Conveyor to Hopper	0.5 tons/hr	N/A	N/A	N/A

Emission rates for the new and modified emission units are calculated using PM₁₀ emission factors for existing emission units handling gypsum material. The factor used is 0.023 lb PM₁₀/ton gypsum processed. This factor is conservative, the AP-42, Table 11/19.2-2 proposes a factor of 0.001lb PM₁₀/ton for a conveyor transfer.

Table III-C-2: Emission Unit PTE (tons per year)

EU	SCC	Throughput		EF lbs/ton	CF ¹	Control Method	PM ₁₀ Emissions	
		tons/hr	tons/year				lbs/hr	tons/year
E.1	30501504	92	800,000	0.023	0.18	Moisture	0.34	1.67
E.8	30501504	65	565,480	0.023	0.005	BV01-02	0.01	0.03
E.9.1	30501504	0.5	4,320	0.023	1.00	None	0.01	0.05
E.9.2	30501504	0.5	4,320	0.023	1.00	None	0.01	0.05
L.1	30501508	8.0 acres		1.66 lbs/acre/day	1.00	None	0.55	2.41
L.10	30501508	0.05 acres		1.66 lbs/acre/day	1.00	None	0.01	0.02
L.18	30501504	10	85,000	0.01	0.005	BV01-02	0.01	0.01
L.19	30501504	0.5	4,320	0.023	1.00	None	0.01	0.05

¹Control Factor: 0.18 is equivalent to 82% control (0.5 % moisture); 0.005 is equivalent to 99.5% control.

PTE of the emergency fire pump (EU: P.01) was calculated using 500 hours per year of emergency operation. The unit can operate 100 hours per year for testing and maintenance.

Table III-C-3: Emergency Fire Pump Engine (tons/year)

EU	Description	Rating	PM ₁₀	NO _x	CO	SO _x	VOC	HAP
P.01	Diesel Fire Pump	144 hp	0.08	1.12	0.24	0.07	0.09	0.01

D. Performance Testing and Emissions Monitoring

Performance testing for the wallboard production operation shall be conducted annually and within 60 days of the anniversary date of the previous performance test. The required performance testing will be performed using the following methods:

Table III-D-1: Performance Testing Protocol Requirements

EU	Description	NSPS/AQR Applicability	Compliance Standard	Performance Test	Frequency
C.17, C.19 – C.23	Baghouse: BH01 Gypsum Handling, Rock Unloading Hoppers #1 and #2, Rock Unloading Hopper Discharge Belts #1 and #2	OOO/AQR 34	7 percent opacity	Method 9	Annual
			0.05g/dscm (0.022gr/dscf)	Method 5 or Method 17	Every 5 years
C.24	C10 Belt	OOO/AQR 34	7 percent opacity	Method 9	Annual
C.25	C11 Belt	OOO/AQR 34	7 percent opacity	Method 9	Annual
E.1.2	Rock Feed Hopper	OOO/AQR 34	7 percent opacity	Method 9	Annual

EU	Description	NSPS/AQR Applicability	Compliance Standard	Performance Test	Frequency
E.1.3	Reclaim Feed Hopper	OOO/AQR 34	7 percent opacity	Method 9	Annual
E.2	C3 Foldbelt	OOO/AQR 34	7 percent opacity	Method 9	Annual
E.6	Conveyor Drop to Rock Bin	OOO/AQR 34	7 percent opacity	Method 9	Annual
E.7	Rock Storage Silos #1 and #2 Feedbelt	OOO/AQR 34	7 percent opacity	Method 9	Annual
E.8, L.18	Bin Vents: BV01 and BV02 Rock Storage Silos #1 and #2	OOO/AQR 34	7 percent opacity	Method 9	Annual
E.9	Rock Storage Silos #1 and #2 Discharge Belt	OOO/AQR 34	7 percent opacity	Method 9	Annual
E.10	Bin Vent: BV03 CP Mill Feed Silo	OOO/AQR 34	7 percent opacity	Method 9	Annual
E.11, E.12	Baghouse: BH02 CP Mill	UUU	10 percent opacity	Method 9	Annual
			0.092g/dscm (0.040gr/dscf)	Method 5 or Method 17	Every 5 years
F.1, F.2	Baghouses: BH04 – BH08 Roller Mills	AQR 34	7 percent opacity	Method 9	Annual
F.5.1, F.5.2, F.6.1, F.6.2, G.3.1, G.3.2	Baghouse: BH09 LP Bins/Cooling Bin Elevator	AQR 34	7 percent opacity	Method 9	Annual
G.5, G.7, G.9	Baghouses: BH10 – BH 16 Kettle Calciners	UUU	10 percent opacity	Method 9	Annual
			0.092g/dscm (0.040gr/dscf)	Method 5 or Method 17	Every 5 years
H.1 – H.10, H.10.1 – H.10.7, H.11 – H.18	Baghouse: BH17 Finish Bin	OOO/AQR 34	7 percent opacity	Method 9	Annual
			0.05g/dscm (0.022gr/dscf)	Method 5 or Method 17	Every 5 years
H.20.1, H.23, H.24	Baghouse: BH18 Mixer #3	AQR 34	7 percent opacity	Method 9	Annual
H.19.3, H.20.2	Baghouse: BH19 Mixer #5	AQR 34	7 percent opacity	Method 9	Annual
H.19.2, H.20.4	Baghouse: BH20 Mixer #6	OOO/AQR 34	7 percent opacity	Method 9	Annual
H.20.3, H.21	Baghouse: HB21 Bulk Plaster Loading	OOO/AQR 34	7 percent opacity	Method 9	Annual
			0.05g/dscm (0.022gr/dscf)	Method 5 or Method 17	Every 5 years
I.1	Baghouse: BH03 Stucco Cooler/Transfer	AQR 34	7 percent opacity	Method 9	Annual
I.5 – I.13, J.1.1, J.1.2, K.12	Baghouse: BH23 Board Plant Stucco Bins	OOO	7 percent opacity	Method 9	Annual
			0.05g/dscm (0.022gr/dscf)	Method 5 or Method 17	Every 5 years
J.4, J.5, J.6	Baghouse: BH24 End Trim	AQR 34	7 percent opacity	Method 9	Annual

EU	Description	NSPS/AQR Applicability	Compliance Standard	Performance Test	Frequency
K.1	Bin Vent: BV06 LP Bin (Accelerator)	AQR 34	7 percent opacity	Method 9	Annual
K.2 – K.11, K.15	Baghouse: BH22 Accelerator Ball Mill	OOO/AQR 34	7 percent opacity	Method 9	Annual
			0.05g/dscm (0.022gr/dscf)	Method 5 or Method 17	Every 5 years
L.4, L.5, L.7, L.7.1, L.8	Gypsum Wallboard Recycling - conveyors	OOO/AQR 34	7 percent opacity	Method 9	Annual
L.7.2, L.7.3, L.7.4	Gypsum Wallboard Recycling - screen	OOO/AQR 34	7 percent opacity	Method 9	Annual
L.3, L.6	Gypsum Wallboard Recycling - crushers	OOO/AQR 34	15 percent opacity	Method 9	Annual

E. Emissions Monitoring

Compliance Assurance Monitoring (CAM) requirements were not analyzed during this permitting action.

IV. REGULATORY REVIEW

A. Local Regulatory Requirements

DAQEM has determined that the following public law, statutes and associated regulations are applicable:

1. Nevada Revised Statutes (NRS), Chapter 445; Sections 401 through 601;
2. Portions of the AQR included in the State Implementation Plan (SIP) for Clark County, Nevada. SIP requirements are federally enforceable. All requirements from Authority to Construct permits and Section 16 Operating Permits issued by DAQEM are federally enforceable because these permits were issued pursuant to SIP-included sections of the AQR; and
3. Portions of the AQR not included in the SIP. These locally applicable requirements are locally enforceable only.

B. Federally Applicable Regulations

The applicability of the following federal regulations was analyzed during this permitting action.

40 CFR PART 60 - STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES:

Subpart A - General Provisions

40 CFR 60.7-Notification and record keeping.

Discussion: This regulation requires notification to DAQEM of modifications, opacity testing, records of malfunctions of process equipment and/or monitoring device, and performance test data. These requirements are found in the Part 70 OP DAQEM requires records to be maintained for five years, a more stringent requirement than the two (2) years required by 40 CFR 60.7.

40 CFR 60.8 - Performance tests.

Discussion: These requirements are found in the Part 70 OP. Notice of intent to test, the applicable test methods, acceptable test method operating conditions, and the requirement for three runs are outlined in this regulation. DAQEM requirements for initial performance testing are identical to 40 CFR 60.8. DAQEM also requires periodic performance testing on emission units based upon throughput or usage. More discussion is in this document under the compliance section.

40 CFR 60.11 - Compliance with standards and maintenance requirements.

Discussion: CGM is subject to two NSPS standards: Subpart OOO- Standards of Performance for Nonmetallic Mineral Processing Plants and Subpart UUU- Standards of Performance for Calciners and Dryers in Mineral Industries..

40 CFR 60.12 – Circumvention.

Discussion: These requirements are found in the Part 70 OP. This is also SIP-approved local rule 40 CFR 80.1.

40 CFR 60.13 - Monitoring requirements.

Discussion: Part 70 OP contains the monitoring conditions. In addition, the CAM plan approved for the monitoring procedures follows the requirements outlined including span time and recording time.

40 CFR 60 Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants

40 CFR 60.670 - Applicability and designation of affected facility.

Discussion: The 40 CFR 60, Subpart OOO applies to this source.

40 CFR 60.672 – Standard for particulate matter.

Discussion: The source is subject to the requirements of particulate matter standards and emission limits, including PM limit and opacity limits, as described in Tables 2 and 3 of the Subpart. These requirements are found in the Part 70 OP.

40 CFR 60.675 - Test methods and procedures.

Discussion: The Permittee shall determine compliance with the PM standards using test methods described in this subsection. Opacity standards to be demonstrated using Method 9 and the PM emission standards are to be demonstrated using Method 5 or Method 17. These requirements are found in the Part 70 OP.

40 CFR 60.676 – Reporting and recordkeeping.

Discussion: The Permittee shall submit to the Control Officer information required by this subsection. Specific record keeping and reporting requirements are identified in the Part 70 OP.

40 CFR 60 Subpart UUU - Standards of Performance for Mineral Processing Utilizing Calciners and Dryers

40 CFR 60.730 - Applicability and designation of affected facility.

Discussion: The 40 CFR 60, Subpart UUU applies to this source.

40 CFR 60.732 – Standard for particulate matter.

Discussion: No emissions shall be discharged into the atmosphere from any affected facility that: (a) Contains particulate matter in excess of 0.092 gram per dry standard cubic meter (g/dscm) [0.040 grain per dry standard cubic foot (gr/dscf)] for calciners and for calciners and dryers installed in series and in excess of 0.057 g/dscm (0.025 gr/dscf) for dryers; and (b) Exhibits greater than 10 percent opacity, unless the emissions are discharged from an affected facility using a wet scrubbing control device. These requirements are identified in the Part 70 OP.

40 CFR 60.734 - Monitoring of operations.

Discussion: Daily opacity observation is required as per this subpart. The requirement is found in the operating permit.

40 CFR 60.735 – Reporting and recordkeeping.

Discussion: Record keeping of daily opacity observations is required. These requirements are found in the Part 70 OP.

40 CFR 60.736 - Test methods and procedures.

Discussion: The Permittee shall determine compliance with the PM standards using test methods described in this subsection. Opacity standards to be demonstrated using Method 9 and the PM emission standards are to be demonstrated using Method 5. These requirements are found in the Part 70 OP.

V. COMPLIANCE

A. Compliance Certification

- a. Regardless of the date of issuance of this Part 70 OP, the schedule for the submittal of reports to the Control Officer shall be as follows:

Table IV-A-1: Reporting Schedule

Required Report	Applicable Period	Due Date ¹
Semi-annual Report for 1st Six-Month Period	January, February, March, April, May, June	July 30 each year
Semi-annual Report for 2 nd Six-Month Period, Any additional annual records required.	July, August, September, October, November, December	January 30 each year
Annual Compliance Certification Report	Calendar Year	January 30 each year
Annual Emission Inventory Report	Calendar Year	March 31 each year
Notification of Malfunctions, Startup, Shutdowns or Deviations with Excess Emissions	As Required	Within 24 hours of the Permittee learns of the event
Report of Malfunctions, Startup, Shutdowns or Deviations with Excess Emissions	As Required	Within 72 hours of the notification
Deviation Report without Excess Emissions	As Required	Along with semi-annual reports
Performance Testing	As Required	Within 60 days from the end of the test.

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