



**DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT**

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**FINAL ACTION REPORT PART 70 OPERATING PERMIT  
RENEWAL**

CertainTeed Gypsum Manufacturing, Inc.  
Source: 4

Public Notice: Review-Journal May 18, 2009  
Public Comments: May 18, 2009 to June 16, 2009

Comments Received:  
CertainTeed Gypsum Manufacturing, Inc.

Public Hearings: No public hearing was held.

Issuance date: November 3, 2009  
Expiration date: November 2, 2014

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 Part 70 OP (Title V), and the final TSD.

**COMMENTS RECEIVED FROM CERTAINTEED GYPSUM MANUFACTURING  
AND DAQEM RESPONSE**

DAQEM received comments for the source on June 16, 2009 and the relevant parts of the comments are provided below:

**Comments on Draft Part 70 Operating Permit Technical Support  
Document (TSD).**

Page 1

PTE values shown in Table 1 should be as follows:

PM<sub>10</sub> - 54.16 tons per year  
NO<sub>x</sub> - 89.31 tons per year  
CO - 120.90 tons per year  
SO<sub>2</sub> - 0.81 tons per year  
VOC - 42.60 tons per year  
HAP - 2.26 tons per year

A summary of the totals for each emission unit group is also attached to show how the above was calculated. The only discrepancies noted are for PM<sub>10</sub> and HAP.

**DAQEM Response:**

Changes of the source-wide PTE are related to the building enclosure of the alternate wallboard recycle system. The enclosure of the wallboard recycle system will be addressed in a separate permitting action that include updated operational, emission control, monitoring, performance testing, record keeping, and reporting requirements. Consequently, the comments to the Technical Support Document (TSD) of the Part 70 OP will be addressed in a separate permitting action.

Page 10

Totals shown in Table III-A-1 should be consistent with the totals in Table 1 if they are revised.

**DAQEM Response:**

Changes of the source-wide PTE are related to the building enclosure of the alternate wallboard recycle system. The enclosure of the wallboard recycle system will be addressed in a separate permitting action that include updated operational, emission control, monitoring, performance testing, record keeping, and reporting requirements. Consequently, the comments to the Technical Support Document (TSD) of the Part 70 OP will be addressed in a separate permitting action.

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Portions of Table III-B-1 addressing the alternative recycle system should be modified as shown below.

<b>EU</b>	<b>Description</b>	<b>BACT Technology</b>	<b>BACT Limit</b>
M.1 – M.10 and M.12 - 16	Alternate Wallboard Recycling System (conveying, grinder and screen)	Water Sprays/chemical Stabilizer Building enclosure	Minimum 0.5% moisture by weight in materials less than 0.125 inch in diameter No visible emission from building enclosure
M.11	Alternate Wallboard Recycling System (conveying)	Baghouse, 99.5% control efficiency Building enclosure	Baghouse shall not exhibit visible emissions greater than 7% opacity, or discharge into the atmosphere emissions in excess of 0.05 g/dscm of PM10 No visible emissions from building enclosure

These modifications were proposed in a letter from CertainTeed dated March 31, 2009. A table which was attached to that letter is included with these comments.

**DAQEM Response:**

All comments to the Technical Support Document (TSD) of the Part 70 OP will be addressed in a separate permitting action. In the letter dated March 31, 2009 CertainTeed Gypsum requested modification of the existing permits held by the source. The source requested removal of the alternate operating scenario that has been permitted since 1997. The removal of the alternate scenario did not increase source PTE and simplified permit conditions without any changes to the emission units, monitoring, performance testing, and recordkeeping requirements, DAQEM incorporated the changes into Part 70 OP.

Additionally, the source asked for changes to the gypsum wallboard recycling operation. The recycling system was permitted with an ATC Modification 6, issued on May 29, 2008. After permit issuance the source decided to place the recycle system inside a building. Consequently, operational, emission control, monitoring, performance testing, and record keeping conditions have to be revised and updated. The source requested permit changes in the letter, but did not apply for the modification of the existing ATC. Therefore, the requested change cannot be incorporated into this Title V Operating Permit.

Pages 22-23

Table III-C-10 should be modified as shown in the table which is referenced in the above comment.

**DAQEM Response:**

Due to the same reasons explained in the above responses, DAQEM is not able to accept the requested change.

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Table III-D-1 should be modified as shown below for EU's associated with wallboard recycling:

EU	Description	NSPS/AQR Applicability	Compliance Standard	Performance Test	Frequency
L.3, L.4, L.5,L.6, L.7, L.8,L.17, L.18	Gypsum Wallboard Recycling	OOO	10 percent opacity	Method 9	Annual
M.3, M.4, M.5, M.6, M.7, M.8, M.9, M.10 M.12, M.13	Alternate Recycle System	OOO	10 percent opacity or no visible emissions from building	Method 9 or Method 22	Annual
M.11	Alternate Recycle System	OOO	7 percent opacity or no visible emissions from building	Method 9 or Method 22	Annual
			0.05 g/dscm	Method 5,	

EU	Description	NSPS/AQR Applicability	Compliance Standard	Performance Test	Frequency
			(0.022 gr/dscf) or no visible emissions from building	Method 17 or Method 22	
L.19, L.20, L.21	Gypsum Wallboard Recycling	OOO	7 percent opacity 0.05 g/dscm (0.022 gr/dscf)	Method 9	Annual

**DAQEM Response:**

Due to the same reasons explained in the above responses, DAQEM is not able to accept the requested change.

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The portion of this table regarding the alternate recycle system should be modified to be consistent with the comments above. Daily monitoring of the building openings to verify no visible emissions was proposed in the March 31, 2009 letter as well.

**DAQEM Response:**

In the letter from March 31, 2009, the source asked for changes to the gypsum wallboard recycling operation. The recycling system was permitted with an ATC Modification 6, issued on May 29, 2008. After permit issuance the source decided to place the recycle system inside a building. Consequently, operational, emission control, monitoring, performance testing, and record keeping conditions have to be revised and updated. The source requested permit changes in the letter, but did not apply for the modification of the existing ATC. All comments to the Technical Support Document (TSD) of the Part 70 OP will be addressed in a separate permitting action.

**Comments on Draft Part 70 Operating Permit.**

Majority comments to the Part 70 OP address changes to the gypsum recycle system. DAQEM decided to incorporate changes to the gypsum recycle system into Part 70 OP in a separate permitting action.

Page 1

Correct phone number for Glenn Abraham is 702-875-4111 x102.

**DAQEM Response:**

The phone number was updated.

Page 2

See the discussion regarding total PTE in the draft TSD comments (Table 1)

**DAQEM Response:**

All comments related to the gypsum recycle system will be addressed in a separate permitting action. The enclosure of the wallboard recycle system in a building will be included and the operational, emission control, monitoring, performance testing, record keeping, and reporting requirements will be updated through a permit revision

Page 9

See the discussion regarding total PTE in the draft TSD comments (Table III-1). Also, Tables IV-A-1, 2-a, 3-a, 4-a, 5, 6, 7-a, 8, 9 and 11 should specify in the title that emissions are for PM<sub>10</sub>.

**DAQEM Response:**

Same response as previous.

Page 10

Table IV-A-3-a should be the same as Table II-C-3 in the TSD for the same EU's.

**DAQEM Response:**

Same response as previous.

Page 16

Table IV-A-11 should be modified as discussed in the comments for the TSD.

**DAQEM Response:**

All comments related to the gypsum recycle system will be addressed in a separate permitting action. The enclosure of the wallboard recycle system in a building will be included and the operational, emission control, monitoring, performance testing, record keeping, and reporting requirements will be updated.

Page 17

Condition IV.B.1.c should be modified as follows:

The baghouses listed in Table IV-A-1 and Table IV-A-2-a, Table IV-A-4-a, and Table IV-A-8 through Table IV-A-11 inclusive, shall not exhibit visible emissions greater than seven (7) percent opacity, or discharge into the atmosphere emissions from any stack which contains particulate matter in excess of 0.05 g/dscm (0.022 gr/dscf). *[40 CFR 60, Subpart OOO (60.672)]*

Condition IV.B.1.e can be deleted since NSPS Subpart UUU does not apply to the kettle calciners.

A new condition can be added to this section to allow for the no visible emission standard contained in 40 CFR 60.672(e) which is applicable to EU's listed in Table IV-A-11.

**DAQEM Response:**

The condition was revised and reads as follows:

- c. The baghouses listed in Table IV-A-1 and Table IV-A-2-a, Table IV-A-4-a, and Table IV-A-6 through Table IV-A-11 inclusive, shall not exhibit visible emissions greater

than seven (7) percent opacity, or discharge into the atmosphere emissions from any stack which contains particulate matter in excess of 0.05 g/dscm (0.022 gr/dscf). [40 CFR 60, Subpart OOO (60.672)]

DAQEM determined that only monitoring of emissions and operations with a continuous opacity monitoring system does not apply to kettle calciners (40 CFR 60.734). However, standards for particulate matter still apply (40 CFR 60.732). The condition reads as follows:

- e. The baghouses on the kettle calciners (EUs: G.1.1 through G.1.7) listed in Table IV-A-7-a shall not exhibit visible emissions greater than ten (10) percent opacity, or discharge into the atmosphere emissions from any stack which contain particulate matter in excess of 0.092 g/dscm (0.040 gr/dscf). [40 CFR 60, Subpart UUU (60.732)]

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Table IV-D-1 should be modified for the alternate recycle system as discussed in the comments above pertaining to Table III-D-1 of the TSD.

**DAQEM Response:**

All comments related to the gypsum recycle system will be addressed in a separate permitting action. The enclosure of the wallboard recycle system in a building will be included and the operational, emission control, monitoring, performance testing, record keeping, and reporting requirements will be updated.

All the corrections/changes mentioned in the comments above have been incorporated in the final Part 70 OP.

There were no other comments from the public or from EPA Region 9.