DES
DEPARTMENT OF ENVIRONMENT AND SUSTAINABILITY
air quality desert conservation PROGRAM sustainability

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PART 70
TECHNICAL SUPPORT DOCUMENT
(STATEMENT of BASIS)

APPLICATION FOR:
Operating Permit Minor Revision

PREPARED BY:
Broadbent & Associates, Inc.
For
PABCO Building Products, LLC

Source Name: PABCO Gypsum
Source ID: 00011

SOURCE LOCATION:
8000 East Lake Mead Boulevard
Las Vegas, Nevada 89124

SIC 3275: Gypsum Products
NAICS Code 327420: Gypsum Product Manufacturing

TSD Date: July 1, 2025

EXECUTIVE SUMMARY

PABCO Gypsum, a division of PABCO Building Products, LLC, is a wallboard manufacturing facility that falls under SIC code 3275, "Gypsum Products," and NAICS code 327420, "Gypsum Product Manufacturing." The facility is located in Hydrographic Area 215 (the Black Mountains area), which is classified as attainment for all regulated air pollutants. The source is subject to the requirements of 40 CFR Part 60, Subparts IIII, OOO, and UUU, and 40 CFR Part 63, Subparts ZZZZ and CCCCCC. It is neither a categorical stationary source as defined in AQR 12.2.2(j) nor belongs to a stationary source category which, as of August 7, 1980, is being regulated under Section 111 or 112 of the Act. Therefore, fugitive emissions are not included in source status determination. The source is a major stationary source for NO_x, CO, and GHG, a synthetic minor source for PM_{10}, and $PM_{2.5}$, and a minor source for SO_2, VOC, and HAP.

The PABCO operation includes the mining, crushers, screens, calciners, aggregate dryers, impeller mills, mixers, storage bins, conveyors, and board dryers needed to manufacture wallboard panels. Gypsum ore is mined from an on-site quarry, passed through several beneficiation processes, and stored prior to its use in the manufacturing processes. Under the primary operating scenario, the Coe board dryer is operated by combusting natural gas in the burners. This unit may also receive exhaust gas from the co-located power-generating facility owned and operated by Nevada Cogeneration Associates #2 (NCA #2) as an alternative operating scenario. In addition to the wallboard manufacturing operations, the source operates diesel-powered water pumps and an aboveground gasoline storage tank.

To reduce waste, a reclaim/reuse process recycles approximately 4% of all manufactured wallboard that does not meet industry specifications.

Table 1 summarizes the source PTE for each regulated air pollutant for all emission units addressed by this Part 70 Operating Permit.

Table 1. Source PTE (tons per year)

Pollutants	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAP	CO_2e
Nonfugitive Emissions	68.64	30.18	313.44	457.25	3.95	83.34	7.74	314,692.52
Fugitive Emissions	61.65	7.41	4.70	16.55	0.84	0	0	
Source PTE	130.29	37.59	318.14	473.80	4.79	83.34	7.74	314,692.52
Major Source Thresholds (Title V)	100	100	100	100	100	100	10/25	
Major Source Thresholds (PSD)	250	250	250	250	250	250	10/25	

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ACRONYMS AND ABBREVIATIONS

ANFO	ammonium nitrate-fuel oil
AQR	Clark County Air Quality Regulation
ATC	authority to construct
BACT	best available control technology
CARB	California Air Resources Board
CFR	Code of Federal Regulations
CH_4	methane
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
DAQ	Division of Air Quality
DES	Clark County Department of Environment and Sustainability
EPA	U.S. Environmental Protection Agency
EU	emission unit
GDO	gasoline dispensing operation
GWP	global warming potential
H_2S	hydrogen sulfide
hp	horsepower
gpm	gallons per minute
MMBtu	British thermal units (in millions)
N_2O	nitrous oxide
NAICS	North American Industry Classification System
NOV	notice of violation
NO_x	nitrogen oxide(s)
O&M	operations and maintenance
Pb	lead
$PM_{2.5}$	particulate matter less than 2.5 microns in aerodynamic diameter
PM_{10}	particulate matter less than 10 microns in aerodynamic diameter
ppm	parts per million
PTE	potential to emit
RACT	reasonably available control technology
RT	round trip
SDE	status determination emissions
SIC	Standard Industrial Classification
SO_2	sulfur dioxide
TDS	total dissolved solids
VAEL	voluntary accepted emission limit
VMT	vehicle miles traveled
VOC	volatile organic compound

I. SOURCE INFORMATION

Action Received:	April 24, 2025
Permittee:	PABCO Gypsum
Source ID #:	00011
Source Name:	PABCO Building Products, LLC
Source Address:	8000 East Lake Mead Boulevard, Las Vegas, NV 89124

II. PROCESS DESCRIPTION

PABCO has organized the various operations into groups, as described below.

Group 1: Quarry Operations

Mining operations in the quarry include drilling, blasting, loading, and hauling gypsum ore. The ore is transported from the quarry to a stockpile via a conveyor system.

Group 2: Beneficiation Operations

In the beneficiation process, the gypsum is separated from clays and other impurities found in the ore. The ore is then dried in a rotary dryer equipped with natural gas fired burners. A baghouse is used to control dust from the drying operation. The dried ore is conveyed to a dome building for storage until needed for wallboard manufacturing.

Group 4: Transfer Station and Boardline #1 Calcining Operations

Gypsum ore is conveyed from the storage dome to a transfer station, where it is crushed and screened before being transferred to a tripper station. Dust emissions associated with these operations are controlled with a baghouse. The tripper station allows gypsum ore to be transferred to either the Boardline #1 or Boardline #2 calcining and wallboard manufacturing plants.

IMP mills dry, fine grind, and calcine the gypsum to produce stucco. Each mill is equipped with a cyclone collector to remove stucco product from the gas stream and a baghouse to control dust from the cyclone. From the IMP mills, the stucco is conveyed to two storage bins controlled with baghouses. The individual natural gas burners are the only source of heat for each IMP mill.

Group 5: Boardline #1 Wallboard Manufacturing

The stucco produced is conveyed to storage silos. Dust generated during conveying and storage is controlled by baghouses. In the wallboard manufacturing process, stucco and other dry additives are fed from the various storage bins into a pin mixer. Water and other liquid additives are added to the mixer to produce a stucco slurry, which is then extruded between two sheets of paper at a forming station to produce a continuous sheet of gypsum wallboard. The wallboard product is then conveyed to a drying oven. The board drying equipment consists of the Coe dryer, which has five zones and eight decks. Air flow is created in the upper level of each zone by circulating fans. Each zone is equipped with a natural gas fired burner, which is used under the primary operating scenario, and a duct to receive exhaust gas from NCA #2 under the alternative operating scenario. A series of vanes and nozzles distribute the hot air through the board drying decks. Wallboard is conveyed continuously through the dryer, with the speed and air temperatures continuously adjusted to maintain optimum board drying conditions. After passing across the board surfaces, the air is recirculated back to the burners, where the cycle starts over. Each zone has an exhaust

stack that vents a portion of the circulating air. After drying, the edges of the product are trimmed with saws. Dust generated in this operation is collected and controlled by a baghouse. Ancillary to the manufacturing process, some product is cut up to make slutters or to produce a different length of board. Dust generated in these operations is collected and controlled by a baghouse.

Group 6: Accelerator System

Accelerator is an additive produced from raw gypsum supplied from one of the IMP mill rock feed bins. It is produced by fine grinding the raw gypsum in a crusher and then a ball mill. The accelerator product is stored in a bin, from which it is fed to the pin mixer along with other dry additives. The emission units in this group include conveyors, storage bins, a crusher, and a ball mill. Accelerator raw material is also purchased in bags, the content of which can be transferred to the accelerator processing system. A baghouse controls dust generated by the ball mill.

Group 7: Boardline #2 Calcining Operations

This group of emission units consists of four IMP mills and associated equipment; it operates in a manner similar to the Boardline #1 calcining operation. There are no alternative operating scenarios associated with Boardline #2 equipment.

Group 8: Boardline #2 Wallboard Manufacturing

This group operates in the same manner as the Boardline #1 manufacturing process. Boardline #2 uses two Flakt board dryers, each equipped with three separate heating zones. No alternative operating scenario is associated with this operation.

Group 9: Cooling Towers

This group consists of two 1,200 gallon per minute (gpm) cooling towers and one 3,495-gpm cooling tower.

Group 10: Fuel Storage Tanks

This group consists of one 10,000-gallon aboveground gasoline tank and five aboveground diesel storage tanks (10,000 gallon, 1,000 gallon, 550 gallon, and two 300 gallon).

Group 11: Recycling Operation

This operation consists of equipment for recycling off-specification gypsum wallboard, including equipment to grind, screen, and store recycled material for re-use in the gypsum manufacturing process. Dust emissions are controlled with baghouses.

Group 12: Pumps

This group consists of two diesel-powered fire pumps (240 hp each) and two diesel-powered water pumps (464 hp and 85 hp).

III. PERMITTING HISTORY

The Title V operating permit for PABCO Building Products was renewed on February 11, 2025.

Current Permitting Action

An application for a minor revision was submitted on April 24, 2025. The application requested the following changes:

- Increase the consecutive 12-month throughput of the silicone component in inks from 283,200 to 483,200 pounds (EU: E40)
- Increase the consecutive 12-month throughput for printing and other VOC-containing materials (EU: E40) from 554,100 to 753,600 pounds.
- Remove the "make-up ink" component from EU: E40.
- Increase the consecutive 12-month throughput of the silicone component in inks from 188,800 to 388,800 pounds (EU: H36).
- Increase the consecutive 12-month throughput for printing and other VOC-containing materials (EU: H36) from 579,300 to 779,000 pounds.
- Increase the consecutive 12-month throughput for the feeder (EU: E43) from 44 to 144 tons.
- Increase the consecutive 12-month throughput for the feeder (EU: H37) from 29 to 129 tons.
- Revise the primary and alternate operating scenarios for the Coe board dryer (EU: E39) to identify the primary operation to be combustion of pipeline natural gas and the secondary operation to be exhaust gas from Nevada Cogeneration Associates #2 (NCA #2).

Previous permitting actions identified exhaust gas from NCA #2 as the primary scenario for operation of the Coe board dryer. The permittee stated that the contract with NCA #2 has expired and, to date, has not been renewed. However, the permittee wishes to retain the option for utilizing exhaust gas in the operating permit in the event that the contract is renewed at a future date. As a result, the source PTE for the Coe board dryer, which is based on worst-case emissions for each pollutant from each operating scenario, remains unchanged.

Changes Not Requested in the Application

- At the request of the Compliance division of DES, the description of the Coe Board dryer (EU: E39) has been revised to include both possible operating scenarios (Table 1-1 of the operating permit).
- At the request of the Compliance division of DES, the operational limitations for EUs: E40 and H36 have been revised to include the VOC content for each component of the inks consumed (Table 3-1 of the operating permit).
- As a means to align the PABCO operating permit with other permits for similar facilities in Clark County, the following recordkeeping requirement have been added to the permit:

  Condition 4.3.7(e): Monthly, consecutive 12-month total of usage of all VOC-containing materials used in the manufacturing of wallboard (reported semiannually);

  Condition 4.3.7(f): Monthly, consecutive 12-month total hours of operation when utilizing NCA exhaust gas (reported semiannually);

  Condition 4.3.7(g): Monthly, consecutive 12-month total hours of operation for each natural gas-fired emission unit (reported semiannually);

IV. FACILITY EMISSION UNITS

Emission Units

Table IV-1 lists the emission units at this stationary source.

Table IV-1: Emission Unit List

EU	Description	Rating	Manufacturer	Model No.	Serial No.	SCC
Quarry Operations (Group #1)						
A1	Material Handling					30502099
A5	Blasting	50,000 sq ft/blast				30504001
	Drilling	750 tons ANFO per year. 10,000 holes/yr				30504002
Beneficiation Operations (Group #2)						
B1	Hopper Feeder					30501503
B2	Primary Crusher	615 tons/hr	Pioneer	VS4248	403748	30501505
B3	Conveyor System (5 belts & stacker)					30501504
B37	Apron Feeder (2 bins)					30501504
S07	Ore Reclaim Belt					30501504
B40	Screen	615 tons/hr	JCI	6202-32LF	S071888	30501507
B42	Screen Collection Belt					30501504
B41	Hammer Mill	615 tons/hr	Universal Engineering	7036598	306X615	30501506
S13	Recycle Belt					30501504
B36	Rotary Dryer #2	288 tons/hr; 85 MMBtu/hr	Gencor	CFS225	225BH15589 8-07-NA	30501501
B25	Conveyor System (3 belts)					30501504
B28	Dome Stockpile	1.13 Acres				30501508
B29	Conveyor System (2 belts); Dome Bypass (alternate scenario)					30501504
B34	Hopper Feeder					30501503
B35	Hopper Bin					30501509
B32	Conveyor Belt Drop					30501504
B33	Conveyor Belt Drop					30501504
Truck Loading (Group 2a)						
T01	Truck Loading					30502506
Boardline #1 Calcining Operation (Group #4)						
D1	Belt Feeder Drop from Dome					30501504
D2	Belt Feeder Drop from Dome					30501504
D3	Belt Feeder Drop from Dome					30501504

EU	Description	Rating	Manufacturer	Model No.	Serial No.	SCC
D4	Conveyor Belt Drop					30501504
D43	Transfer Station Screen	180 tons/hr	FMC	65	D-801401	30501507
D44	Transfer Station Crusher	30 tons/hr	American Pulverizer	18x18	8133	30501506
D5	Variable Splitter					30501504
D6	Bypass Conveyor					30501504
D7	Conveyor Belt Drop					30501504
D8	Tripper Station					30501504
D9	Screw Conveyor					30501504
D18	Screw Conveyor					30501504
D27	Screw Conveyor					30501504
D10	Rock Bin #1					30501509
D11	Impeller Mill #1	10 tons/hr, 5 MMBtu/hr	CE Raymond	50		30501511
D13	Rock Bin #2					30501509
D14	Impeller Mill #2	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	64017	30501511
D16	Rock Bin #3					30501509
D17	Impeller Mill #3	10 tons/hr, 5 MMBtu/hr	CE Raymond	50		30501511
D19	Rock Bin #4					30501509
D20	Impeller Mill #4	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	84021	30501511
D22	Rock Bin #5					30501509
D23	Impeller Mill #5	10 tons/hr, 5 MMBtu/hr	CE Raymond	50		30501511
D25	Rock Bin #6					30501509
D26	Impeller Mill #6	10 tons/hr, 5 MMBtu/hr	CE Raymond	50		30501511
D28	Rock Bin #7					30501509
D29	Impeller Mill #7	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	86003	30501511
D31	Rock Bin #8					30501509
D32	Impeller Mill #8	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	86002	30501511
D34	Rock Bin #9					30501509
D35	Impeller Mill #9	10 tons/hr, 5 MMBtu/hr	CE Raymond	50	86054	30501511
D45	Rock Bin #14					30501509
D46	Impeller Mill #14	25 tons/hr, 22.5 MMBtu/hr	TBD	83	TBD	30501511
D47	Rock Bin # 15					30501509
D48	Impeller Mill #15	25 tons/hr, 22.5 MMBtu/hr	TBD	83	TBD	30501511
D36	Screw Conveyor System (6 screw conveyors)					30501504

EU	Description	Rating	Manufacturer	Model No.	Serial No.	SCC
D42	Screw Conveyor					30501504
Boardline #1 Wallboard Manufacturing (Group #5)						
E1	Stucco Elevator #1A					30501504
E2	Screw Conveyor					30501504
E3	Stucco Bin #1					30501514
E4	Screw Conveyor					30501504
E5	Entoleter Elevator					30501504
E6	Transfer Point					30501504
E7	Entoleter (Mill)	45 tons/hr	Entoleter, Inc	Series 27/40	5129	30501502
E8	Screw Conveyor					30501504
E9	Screw Conveyor					30501504
E10	Stucco Elevator #1					30501504
E11	Screw Conveyor					30501504
E12	Stucco Bin #2					30501514
E13	Rotary Valve					30501504
E14	Bin #2 Discharge Screw					30501504
E15	Transfer Point					30501504
E16	Scalping Screw					30501504
E17	Scale (Transfer Point)					30501504
E18	Return Screw					30501504
E19	Stucco Recirculating Elevator					30501504
E20	Bin Recirculation Screw					30501504
E21	Rotary Valve					30501504
E22	Live Bottom Bin					30501514
E23	Metering Screw Conveyor					30501504
E23a	Line #1 Paper Heater	4.625 MMBtu/hr	Style B Linoflame Burners		60693	30501503
E25	Accelerator Bin					30501503
E26	Feeder					30501504
E27	Additive Bin					30501503
E27a	Additive Bin/Feeder		Acrision	BDF1.5-GG/2	05467-01	30501503
E29	Additive Bin					30501503
E31	Additive Bin					30501503
E33	Additive Bin					30501503
E28	Feeder					30501504
E30	Feeder					30501504
E32	Feeder					30501504
E34	Feeder					30501504
E43[M]	Feeder					30501504
E24	Mixing Screw Conveyor					30501504
E35	Mixer	90 tons/hr	Broder Machine	5750	8150	30501516
E37	End Saw					30501521
E37a	End Saw Bunker/Disposal		Fabricated On-site			30501514

EU	Description	Rating	Manufacturer	Model No.	Serial No.	SCC
E39[M]	Coe Board Dryer	110 MMBtu/hr (primary operating scenario) NCA Exhaust Gas (alternate scenario)				30501520
E40[M]	Printing and Other VOC-Containing Materials					30501503
E41	Dunnage/Slutter system		Sweetwater Machine and Welding			30501521
E42	Cutback Saw Process		Fabricated On-site			30501521
Accelerator System (Group #6)						
F1	Screw Conveyor					30501504
F2	Vacuum Feed					30501504
F3	Storage Bin					30501509
F4	Storage Bin					30501509
F5	Crusher	6 tons/hr	Mikropulverizer	44		30501506
F6	Screw Conveyor					30501504
F7	Ball Mill	1 ton/hr	Service Welding and Machine	3x19		30501515
F8	Elevator Conveyor					30501504
Boardline #2 Calcining Operations (Group #7)						
G1	Screw Conveyor Drop					30501504
G12	Screw Conveyor Drop					30501504
G2	Rock Bin #10					30501509
G3	Impeller Mill #10 – Aggregate	19 MMBtu/hr	Alston	83	97036	30501511
G4	Double Cone Classifier					30501504
G5	Cyclone Collector					30501509
G7	Rock Bin #11					30501509
G8	Impeller Mill #11	19 MMBtu/hr	Alston	83	97037	30501511
G9	Double Cone Classifier					30501504
G10	Cyclone Collector					30501509
G13	Rock Bin #12					30501509
G14	Impeller Mill #12	22.5 MMBtu/hr	Alston	83	93019	30501511
G15	Double Cone Classifier					30501504
G16	Cyclone Collector					30501509
G18	Rock Bin #13					30501509
G19	Impeller Mill #13	22.5 MMBtu/hr	Alston	83	93020	30501511
G20	Double Cone Classifier					30501504
G21	Cyclone Collector					30501509

EU	Description	Rating	Manufacturer	Model No.	Serial No.	SCC
G6	Feed Screw Conveyor Drop					30501504
G11	Feed Screw Conveyor Drop					30501504
G17	Feed Screw Conveyor Drop					30501504
G22	Feed Screw Conveyor Drop					30501504
Boardline #2 Wallboard Manufacturing (Group #8)						
H1	Stucco Storage Bin #3					30501514
H2	Stucco Storage Bin #4					30501514
H3	Stucco Screw Conveyor					30501504
H4	Stucco Bucket Elevator					30501504
H5	Recirculating Screw Conveyor					30501504
H7	Stucco Feed Elevator					30501504
H8	Stucco Metering					30501514
H6	Stucco Surge Bin					30501514
H11	Additive Bin					30501503
H11a	Additive Bin/Feeder					30501503
H13	Additive Bin					30501503
H15	Additive Bin					30501503
H19	Additive Bin					30501503
H17	Accelerator Bin					30501503
H12	Feeder					30501504
H14	Feeder					30501504
H16	Feeder					30501504
H18	Feeder					30501504
H20	Feeder					30501504
H37[M]	Feeder					30501504
H20a	Line #2 Paper Heater	5.25 MMBtu/hr	Style B Linoflame Burners		51838	30501520
H10	Mixing Screw Conveyor					30501504
H22	Pin Mixer		Broeder Machine Works	8600		30501518
H24	End Saw					30501521
H26	Flakt Board Dryer Combustion, All zones	87.32 MMBtu/hr	ABB Flakt			30501520
H27	Stucco Storage Bin #5					30501514
H28	Stucco Screw Conveyor					30501504
H29	Recirculating Screw Conveyor					30501504
H30	End Saw					30501521
H32	Flakt Board Dryer Combustion Zone 1	45 MMBtu/hr	ABB Flakt			30501520
	Combustion Zone 2	45 MMBtu/hr				

EU	Description	Rating	Manufacturer	Model No.	Serial No.	SCC
	Combustion Zone 3	30 MMBtu/hr				
H33	Stucco Cooler		Gyptech	GKL52690	PALV-0940-ER6565	30501503
H34	Stucco Screw Conveyor					30501504
H35	Stucco Screw Conveyor					30501504
H36[M]	Printing and Other VOC-Containing Materials					30501503
Cooling Towers (Group #9)						
I01	Cooling Tower	1,200 gpm	Evapco	ATW207C	988659W	38500101
I02	Cooling Tower	1,200 gpm	Evapco	ATW207C	988659W	38500101
I03	Cooling Tower	3,495 gpm	Baltimore Aircoil	3473A-2	U054003201	38500101
Gasoline Dispensing Operation (Group #10)						
J01	Aboveground Storage Tank; Regular Gasoline	10,000 gallons				40600306
Reclaim/Reuse Process (Group #11)						
K01	Screw Grinder		ACTA Recycling	AR-GS-6	001612021	30501502
K02	Perforated Screw Conveyor		Martin Screw			30501504
K04	Belt Conveyor	20 tons/hr				30501504
K05	Roller Mill	19.2 tons/hr	Antenore Visentin	RO12C	115-12	30501502
K06	Vibratory Screen	19.2 tons/hr				30501507
K07	Conveyor System (3 belts)					30501504
K10	Storage Bin					30501510
K11	Screw Conveyor System (3 conveyors)					30501504
Pumps (Group #12)						
U03	Diesel Water Pump; DOM: 2012	464 hp	Cummins	QSL9-G7NR3	L120435661	20200102
U04	Diesel Emergency Fire Pump; DOM: 2007	240 hp	John Deere	6068HF120	PE6068468340 2	20200102
U05	Diesel Emergency Fire Pump; DOM: 2007	240 hp	John Deere	6068HF120	CD6068B020 341	20200102
U06	Diesel Water Pump; DOM: 2002	85 hp	Perkins	1004-42	AR36677	20200102
Stockpiles and Haul Roads						
M1	Stockpiles	90 Acres				30502507
K14	Haul Road; Unpaved	14.2 VMT/hr				30502504
	Haul Road; Paved	2.3 VMT/hr				

Note: The 'M' superscript denotes emission units that have been modified with this permitting action.

Table IV-2: Insignificant Activities

Description
Aboveground Storage Tank; Diesel; 10,000 gallons
Aboveground Storage Tanks (2); Diesel; 1,000 gallons
Aboveground Storage Tank; Diesel (2); 300 gallons
Aboveground Storage Tank; Diesel; 550 gallons

V. EMISSIONS CALCULATIONS

Applicability

Permitting applicability is determined by calculating the emissions for all proposed emission units using 8,760 hours of operation (except for emergency generators or fire pumps, which use 500 hours), any inherent controls, any inherent throughput limitations, and the emission factors provided by the manufacturer, by source test results, by EPA AP-42, or by other approved methods.

Applicability emissions include emissions from insignificant emission units and activities, but do not include fugitive emissions (except for categorical sources listed in AQR 12.2.2(j) or any other stationary source category that, as of August 7, 1980, is being regulated under Sections 111 or 112 of the Act). PABCO is not a categorical source, as defined in AQR 12.2.2(j), so fugitive emissions (EUs: A5, M1 and K14) are not included in source applicability determination calculations.

As shown in Tables V-1 and V-2, the source continues to be a major stationary source for NO_x and CO, a synthetic minor source for PM_{10}, and $PM_{2.5}$, and a minor source for SO_2, VOC, and HAP.

Table V-1: Source Applicability Emissions (tons per year)

	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAP	GHG[1]
Permit Applicability Thresholds	5	5	5	25	25	5	N/A	N/A
Major Source Thresholds	100	100	100	100	100	100	10/25[2]	N/A
PSD Thresholds	250	250	250	250	250	250	N/A	N/A
Applicability Emissions	10,871.78	1,606.32	321.70	461.72	3.95	83.89	7.76	314,692.52

[1]Expressed in units of CO_2e
[2]10 tons for single HAP pollutant or 25 tons for any combination of HAP pollutants

PTE

Table V-2: Source PTE (tons per year)

PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAP	GHG[1]
130.29	37.59	318.14	473.80	4.79	83.34	7.74	314,692.52

Table V-3: Emissions Increase Calculation and Significance Evaluation (tons per year)

	PM_{10}	$PM_{2.5}$	NO_X	CO	SO_2	VOC	HAP	GHG[1]
PTE for Current Permitting Action	130.29	37.59	318.14	473.80	4.79	83.34	7.74	314,692.52
PTE from Permit Issued 02/11/2025	130.29	37.59	318.14	473.80	4.79	79.59	7.74	314,692.52
Total Source Emissions Increase	0	0	0	0	0	3.75	0	0
AQR 12.2.2(uu) Significance Thresholds	15	10	40	100	40	40	10	N/A
AQR 12.5.1(d) Minor NSR Significance	7.5	5	20	50	20	20	10	N/A

[1]Expressed in units of CO_2e

VI. CONTROL TECHNOLOGY

There are no new emission units or control devices associated with this permitting action. In addition, the emission increases associated with this permitting action are below the AQR 12.2.2(uu) significant thresholds. Therefore, a BACT analysis is not required. All BACT requirements established with previous permitting actions, remain enforceable. The calculated emission increase is also below the AQR 12.5.1(d) minor NSR significance levels and therefore, a RACT analysis is not triggered.

VII. OPERATIONAL LIMITS

Only operational limitations that have been revised with this permitting action are identified in Table VII-1. All other operational limitations established with previous permitting actions remain enforceable.

Table VII-1: Operational Limitations

Operation	EU	Description	Annual Throughput
Wallboard Line #1—Group 5	E39	Coe Board Dryer	Primary Operating Scenario: 8760 hr/yr @ 110 MMBtu/hr; Alternate Scenario: 1,950,370 tons exhaust gas from NCA.
	E40	Inks and Additives (Printing and Alpha Foamer)	400 pounds black ink (0.99% VOC Content)
			270,000 pounds alpha foamer (0.16% VOC content)
			483,200 pounds silicone (0.02% VOC content)
	E43	Feeder	144 tons/year
Wallboard Line #2—Group 8	H36	Inks and Additives (Printing and Alpha Foamer)	500 pounds black ink (0.11% VOC content)
			390,000 pounds alpha foamer (0.16% VOC content)
			388,800 pounds silicone (0.02% VOC content)
	H37	Feeder	129 tons/year

VIII. MONITORING

There are no additional monitoring requirements associated with this permitting action. All monitoring requirements established with previous permitting actions remain enforceable.

IX. PERFORMANCE TESTING

There are no additional performance testing requirements associated with this permitting action. All performance testing requirements established with previous permitting actions remain enforceable.

X. REVIEW OF APPLICABLE REGULATIONS

There are no additional local or federal regulations associated with this permitting action. All regulations identified with previous permitting actions remain applicable to the source.

XI. PERMIT SHIELD

The permittee did not request a permit shield.

XII. INCREMENT ANALYSIS

The emission increases associated with this permitting action are limited VOC pollutants. The requirements for increment modeling for VOC has not been triggered in Hydrographic Area 215. Therefore, an increment analysis is not required for this permitting action.

XIII. PUBLIC PARTICIPATION

Pursuant to AQR 12.5.2.17, public participation is not required for a minor revision to a Part 70 operating permit.

XIV. ATTACHMENTS

Table XIV-1: VOC Emissions from Ink Consumption

EU	Description	Annual Throughput (lbs/yr)	Pollutant	VOC Content	PTE (tons/yr)
E40	Alpha Foamer	270,000	VOC	16%	21.60
	Black Ink	400		99%	0.20
	Silicone	483,200		2%	4.83
H36	Alpha Foamer	390,000	VOC	16%	31.20
	Black Ink	500		11%	0.03
	Silicone	388,800		2%	3.89

Table XIV-2: Particulate Emissions from Feeders (tons per year)

EU	Description	Annual Throughput (tons/yr)	EF (lb/ton)		CF	$PM_{2.5}$	PM_{10}
			$PM_{2.5}$	PM_{10}			
E43	Feeder	144	0.00345	0.023	0.005	0.01	0.01
H37	Feeder	129	0.003	0.02	0.005	0.01	0.01

Table XIV-3: Applicability Emissions (tons per year)

Process	PM10	PM2.5	NOx	CO	SO2	VOC	HAP
Gypsum Processing	10849.22	1583.95	0	0	0	0	0
Fuel Burning Equipment	21.01	20.82	303.85	451.48	3.90	17.79	6.89
Diesel-Powered Generators	1.19	1.19	17.85	10.24	0.05	1.58	0.09
Cooling Towers	0.36	0.36	0	0	0	0.00	0
Ink Consumption	0	0	0	0	0	61.75	0
Gasoline Dispensing	0	0	0	0	0	2.77	0.78
TOTAL	**10871.78**	**1606.32**	**321.70**	**461.72**	**3.95**	**83.89**	**7.76**