

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION – BUREAU OF AIR POLLUTION CONTROL

Director’s Review and Preliminary Determination of Permit Issuance for

**Nevada Cement Company
Lyon County, Nevada
February 10, 2025**

Nevada Cement Company (NCC) submitted an application for three renewals, four minor revisions, and an operating permit to construct (OPTC) rollover to Class I Air Quality Operating Permit (AQOP) AP 3241-0387, FIN A0030, for the NCC facility in Lyon County, Nevada. The project is located north of Interstate 80 on the corner of Main Street and Commerce Center Drive. Take Exit 46 at Fernley, travel north on Main Street and turn right at Commerce Center Drive to enter the facility. The project is located in all or portions of Sections 10 and 11, Township 20N, Range 24E, M.D.B.&M.

NCC is proposing to renew and revise their Class I AQOP and roll over their Class I OPTC, AP3241-3431, to the AQOP. The minor revisions include a new Finish Mill #4 (Systems 34 through 34F, 35, and 36), addition of a lime injection system, addition of transfer point emission units (S2.108, S2.109, S2.124 through S2.127, and PF1.030 through PF1.033), and permitting the carpet shredding operation that was previously listed as Insignificant Activities.

These projects initially went through public notice in November 2022; however, the draft permit must go through public notice once again as it went through significant changes due to public and U.S. Environmental Protection Agency (EPA) comments.

The Nevada Division of Environmental Protection – Bureau of Air Pollution Control (BAPC) has reviewed the application for the above-referenced operating permit and has made a preliminary determination to issue the operating permit. The facility-wide Potential to Emit (PTE), including emissions from Non-Permit equipment are given in the table below.

<i>Nevada Cement Company Potential to Emit (PTE)</i>		
	Pollutant	Facility-Wide (tons/year)
Current emissions estimates indicate NCC is a Class I Major Stationary Source, as emissions of one or more criteria pollutant are greater than 250 tons per year (TPY). NCC is classified as an area source of HAPs as the PTE for a single HAP is less than 10 TPY and combined HAPs are less than 25 TPY.	PM	Particulate Matter 389.1
	PM₁₀	Particulate Matter ≤ 10 microns in diameter 361.4
	PM_{2.5}	Particulate Matter ≤ 2.5 microns in diameter 217.9
	SO₂	Sulfur Dioxide 377.5
	NO_x	Oxides of Nitrogen 4,191.3
	CO	Carbon Monoxide 334.4
	VOC	Volatile Organic Compounds 146.2
	Pb	Lead 0.02
	Hg	Mercury 49.3
	HAP (single)	Hazardous Air Pollutants < 10
	HAPs (all)	Hazardous Air Pollutants < 25
	GHG (CO_{2e})	Greenhouse Gases (Carbon Dioxide Equivalent) 377,284.6

The project is located in Air Quality Hydrographic Area (HA) 76 of the Fernley Area. HA 76 is designated as PSD and is triggered for SO₂. NCC will be subject to New Source Performance Standards 40 CFR Part 60 Subpart F – Portland Cement Plants, Subpart Y – Coal Preparation and Processing Plants, and Subpart IIII – Stationary Compression Ignition Combustion Engines. NCC is also subject to National Emission Standards for Hazardous Air Pollutants 40 CFR Part 63 Subpart LLL – Portland Cement Manufacturing Industry, Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines, and Subpart CCCCCC – Gasoline Dispensing Facilities. Most recently, NCC is subject to 40 CFR Part 62 Subpart IIIa – Commercial and Industrial Solid Waste Incineration Units that Commenced Construction on or Before June 4, 2010 and Have Not Been Modified or Reconstructed Since August 7, 2013.

Air dispersion modeling conducted by the applicant and the Nevada Division of Environmental Protection – Bureau of Air Quality Planning (BAQP) demonstrates that continued operation of NCC will not violate any air quality standard.

Prevention of Significant Deterioration (PSD) review is not triggered for this permit action. No adverse air quality impacts are anticipated as a result of the proposed action. NCC shall comply with all State and Federal air quality requirements and all conditions established within the proposed draft operating permit.