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

Pyramid Materials DBA American Ready Mix Fernley Ready Mixed Concrete Lyon County, Nevada December 19, 2023

Pyramid Materials DBA American Ready Mix (Pyramid Materials) submitted an application for a revised Class II Air Quality Operating Permit, AP3273-4261, FIN A0140, for the Pyramid Materials facility in Lyon County, Nevada. The project is located at 345 Winston Street, Fernley Nevada, in all or portions of Section 11, Township 20 N, Range 24 E, M.D.B.&M.

The facility operates a ready-mix concrete plant in Fernley, Nevada. Sand and aggregate from storage piles are transferred to a hopper, which is then conveyed to an elevated storage bin, and then to a weigh hopper before dropping into awaiting mix trucks. Cement and fly ash are delivered by trucks and pneumatically transferred to silos. The silo's unload to a weigh hopper before being transferred to the awaiting mix trucks. This permitting action will increase production throughputs, increase operating hours, revise the control efficiencies for the water spray controls, revise the emission limits, and replace two small water heaters with a larger water heater that will be permitted as a new system.

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.

| | Pyramid Materials Potential to Emit (PTE) | | | |
|--|---|--|------------------------------------|---------------------------|
| Current emissions estimates indicate Pyramid Materials is a <i>Class II source</i> , because the facility-wide PTE for any individual regulated pollutant is <i>less</i> than 100 tons per year. | Pollutant | | Revision Net Change (tons/year) | Facility-Wide (tons/year) |
| | PM | Particulate Matter | 14.13 | 16.32 |
| | PM ₁₀ | Particulate Matter ≤ 10 microns in diameter | 4.26 | 5.06 |
| | PM _{2.5} | Particulate Matter ≤ 2.5 microns in diameter | 0.75 | 1.01 |
| | SO ₂ | Sulfur Dioxide | 0.0057 | 0.011 |
| | NOx | Oxides of Nitrogen | 0.95 | 1.80 |
| | CO | Carbon Monoxide | 0.79 | 1.51 |
| | VOC | Volatile Organic Compounds | 0.41 | 0.47 |
| | Pb | Lead | 0.00 | 0.00 |
| | HAP (single) | Hazardous Air Pollutants (Hexane) | 0.017 | 0.032 |
| | HAPs (all) | Hazardous Air Pollutants | 0.018 | 0.034 |

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 NOx. Pyramid Materials is not subject to 40 CFR Part 60 – New Source Performance Standards or 40 CFT Part 63 – National Emission Standards for Hazardous Air Pollutants.

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 Pyramid Materials, will not violate any air quality standard.

Pyramid Materials must comply with all State and Federal air quality requirements and all conditions established within the proposed draft Class II Air Quality Operating Permit.