

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

**Graymont Western US Inc.
Pilot Peak Plant
Elko County, Nevada
May 27, 2025**

Graymont Western US Inc. (Graymont) submitted an application for a renewal and minor revision of Class I Air Quality Operating Permit (AQOP) AP3274-1329.04, FIN A0367, for the Pilot Peak Plant facility in Elko County, Nevada. The project is located approximately 12 miles northwest of Wendover, Nevada, in all or portions of Sections 10, 12 through 16, 21 through 28 and 34 through 36, Township 34N, Range 68E; Sections 30 and 31, Township 34N, Range 69E M.D.B.&M.

Graymont is proposing to renew and revise their AQOP. For the revision, Systems 41 – 44 emission units S2.190 – S2.193 were removed and replaced by S2.204 – S2.207. Also, an emergency diesel fired generator, S2.208, was added as System 59.

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.

Current emissions estimates indicate Graymont is a Class I Major Stationary Source, as emissions of one or more criteria pollutant are greater than 100 tons per year (TPY). Graymont 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.	<i>Pilot Peak Plant Potential to Emit (PTE)</i>			
	Pollutant		Net Change – Revision (tons/year)	Facility-Wide (tons/year)
	PM	Particulate Matter	5.58	391.5
	PM₁₀	Particulate Matter ≤ 10 microns in diameter	1.00	382.1
	PM_{2.5}	Particulate Matter ≤ 2.5 microns in diameter	-1.24	355.2
	SO₂	Sulfur Dioxide	-0.0059	297.9
	NO_x	Oxides of Nitrogen	-31.4	2,117.1
	CO	Carbon Monoxide	-3.90	5,396.0
	VOC	Volatile Organic Compounds	0.00	98.2
	Pb	Lead	0.00	0.00
	Hg	Mercury	0.00	0.00
	HAP (single)	Hazardous Air Pollutants	-	< 10
	HAPs (all)	Hazardous Air Pollutants	-0.015	< 25
	GHG (CO_{2e})	Greenhouse Gases (Carbon Dioxide Equivalent)	-639.7	578,907.4

The project is located in Air Quality Hydrographic Area (HA) 187 of the Goshute Valley and 191 of the Pilot Creek Valley. HA 191 is designated as PSD and is triggered for SO₂, NO_x, and PM₁₀. HA 187 is not a triggered basin for an increment analysis. Graymont will be subject to 40 CFR Part 60 Subpart Y – Coal Preparation and Processing Plants, 40CFR Part 60 Subpart OOO – Nonmetallic Mineral Processing Plants, 40 CFR Part 60 Subpart HH - Lime Manufacturing Plants, 40 CFR Part 60 Subpart IIII – Stationary Compression Ignition Internal Combustion Engines, 40 CFR Part 63 Subpart ZZZZ – Stationary Internal Combustion Engines, and 40 CFR Part 63 Subpart CCCCCC – Gasoline Dispensing Facilities.

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 Graymont 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. Graymont shall comply with all State and Federal air quality requirements and all conditions established within the proposed draft operating permit.