

**OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION**

MEMORANDUM

February 14, 2025

TO: Phillip Fielder, P.E., Chief Engineer

THROUGH: Rick Groshong, Sr. Environmental Manager, Compliance & Enforcement

THROUGH: Eric L. Milligan, P.E., Engineering Manager, Engineering Section

THROUGH: Alex Johnson, E.I., New Source Permits Section

FROM: Ryan Buntyn, P.E., New Source Permits Section

SUBJECT: Evaluation of permit No. **2024-0107-TV R4**
American Gypsum Company, LLC
Gypsum Wallboard Plant (Facility ID: 1428) (SIC 3275)
Section 11, Township 2N, Range 23W, Jackson County, Oklahoma.
Latitude: 34.66029°N, Longitude: 99.58732°W
Directions: 18972 Highway 62 West, Duke, OK 73532

SECTION I. INTRODUCTION

American Gypsum Company, LLC submitted an application to renew their Title V operating permit for its Gypsum Wallboard Plant (SIC Code 3275). The facility is operating under Permit No. 2018-0840-TV R3 issued on September 11, 2019.

The wallboard manufacturing operation is supported by one off-site activity which provides the main raw materials. The activity is permitted separately from Gypsum Wallboard Plant. Permit No. 2021-0414-TV R3 covers the operation of a paperboard manufacturing facility in Lawton, OK.

SECTION II. REQUESTED CHANGES

EU1 - Rock Unloading

- Increasing delivery rates or rock unloading from 232 TPH to 300 TPY; increasing PM₁₀ emission from 0.016 TPY to 0.021 TPY. EU1 increased permitted emission by 2.87 lb/hr PM₁₀.

EU5&6 - Rock Conveyor Belts; EU9 - Storage Bins; EU67 - Rock Crusher and Rotary Ore Dryer

- Increase gypsum rock intake and initial processing from 232 TPH to 250 TPH. This modification does not involve any change of equipment or method of operation. It allows these processes to operate at full capacity for surges in throughput. EU4 increased permit limits by 1.33 TPY PM₁₀. EU9 increased permit limits by 0.26 TPY PM₁₀. EU67 increased permit limits by 0.40 TPY PM₁₀.

EU34 - Accelerator Ball Mill

- Increasing throughput from 0.44 TPH to 1.0 TPH This modification does not involve any change of equipment or method of operation. EU34 increased permit limits by 4.30 TPY PM₁₀.

EU60 and EU69 - Line B Slutter Machines

- Two (2) Line B Slutter Machines are being replaced with EU69 – One (1) Grenzebach Dunnage Machine
- No increase in PM emissions with change of saws; The new machine has thinner sawblades (thin saw kerf) than the old machines and therefore produces less dust material with each cut.

Total permitted emissions will not be increasing by more than 10 TPY for any pollutant.

SECTION III. PERMIT HISTORY

The following table lists all the permitting actions for the Gypsum Wallboard Plant since the first Part 70 operating permit.

Permits	Date Issued	Description
2018-0240-TVR3	9/11/2019	Third TV Operating Permit Renewal.
2013-0286-TVR2 (M-1)	4/14/2015	Minor Modification to fulfill a specific requirement of recent Enforcement Case ID 7273
2013-0286-TVR2	9/17/2013	Second TV Operating Permit Renewal.
2007-143-TVR (M-1)	4/4/2011	Minor Modification to install and operate a stucco cooler.
2007-143-TVR	10/9/2008	First TV Operating Permit Renewal.
99-111-TV	11/4/2002	Initial TV Operating Permit.

SECTION IV. PROCESS DESCRIPTION

Broken gypsum rock is hauled by bottom dump haul trucks from quarries to this manufacturing facility. Gypsum ore is stored outside the plant until it is needed. A front-end loader carries rock from the piles to a hopper where the rock is fed to a crusher. The crusher discharges into a gas-fired dryer. The feed belt, crusher, and dryer are controlled by baghouses.

Dried gypsum rock is discharged from the dryer into a system of belt conveyors, elevators and screws which distribute the rock to the eight pebble rock bins. Those bins and the rock elevators are vented into baghouses. Rock from the bins proceeds to Raymond roller mills. Each of the eight roller mills has a separate baghouse. This milled gypsum, referred to as “land plaster” (LP), is separated through cyclones and conveyed pneumatically to feed bins. The cyclones do not discharge to the atmosphere.

The next step in the process is calcining which removes hydrous/hydrated (chemically bound) water through the application of heat. Kettle calciners use natural gas to heat the milled gypsum

powder to remove water and produce “stucco.” Each kettle has a baghouse and has a separate dedicated stack for combustion products. From the kettles, stucco flows to a “hot pit” for cooling. Stucco from the hot pit is either screw-conveyed from an elevator into storage bins or routed to the stucco cooler. Six active storage bins are referred to as “Production.” Two storage bins were previously referred to as “Railroad” are no longer operational. The storage bins are vented with bin vents. In parallel with the calcining operation, some of the land plaster is diverted into a ball mill where it is ground up to be “accelerator.” The ball mill is vented into a baghouse.

The stucco cooler is an indirect heat exchanger that uses clean air. The clean air is sent to the mill building and used as combustion air for the kettles. The cooler air then cools some of the stucco from the hot pit and the material will be sent to the storage bins.

The “Production” side of the facility is where the final wallboard product is produced. There are two parallel U-shaped production lines, which are essentially identical. The original “A” line is the inner line, and the outer line is referred to as the “B” line.

A wallboard slurry mix is prepared from water, stucco, accelerator, soap, starch, fiberglass, and vermiculite. Bulk starch is stored in a silo served by a baghouse. Solid materials are metered on each line through a mixing screw prior to blending with water. The dry processes are vented to baghouses on each line.

The wallboard slurry is continuously formed between two layers of paper. The stucco rehydrates, absorbing the slurry water and forming a rigid wallboard as moisture is lost. The wallboard is rough-cut to length prior to entering the gas-fired dryers. The A Line divides its production between two independent dryer lines (#1 and #2) while the B Line has only one dryer (#3). The wallboard is allowed to cool before inspection. Due to the wetness of the board, PM emissions are believed to be negligible from cutting; at the time of drying, solids are encased in paper layers, again precluding PM emissions.

Wallboard which passes inspection is bundled and trimmed to final length by saws, completing the manufacturing process. An additional part of the packaging process is the creation of “Dunnage Machines” from waste wallboard which are about 2 x 4 x 48 inches in size and are used as spacers between stacks of finished wallboard. These saw areas vent to baghouses on both lines.

SECTION V. EQUIPMENT

Emission units (EUs) have been arranged into the following outline. Equipment/activities subject to NSPS subparts are also indicated.

EU	Point	Make/Model	Installed Date	NSPS Subpart
EU1	FUG1	Rock Unloading	1964	-
EU5	BH1	Rock Belt Conveyor	1982	-
EU6	BH2	Rock Belt Conveyor	1988	OOO
EU9	R1	Rock Storage Bins	1964	-
EU11	BH6	Raymond Roller Mill #1	1964	-

EU	Point	Make/Model	Installed Date	NSPS Subpart
EU12	BH7	Raymond Roller Mill #2	1964	-
EU13	BH8	Raymond Roller Mill #3	1964	-
EU14	BH9	Raymond Roller Mill #4	1985	OOO
EU15	BH10	Raymond Roller Mill #5	1985	OOO
EU16	BH11	Raymond Roller Mill #6	1985	OOO
EU17	BH12	Raymond Roller Mill #7	1997	OOO
EU18	BH13	Raymond Roller Mill #8	1997	OOO
EU19	BH14	Kettle Calciner #1	Modified 1997	UUU
EU20	BH15	Kettle Calciner #2	Modified 1997	UUU
EU21	BH16	Kettle Calciner #3	Modified 1997	UUU
EU22	BH18	Kettle Calciner #4	Modified 1997	UUU
EU23	BH19	Kettle Calciner #5	Modified 1997	UUU
EU24	BH20	Kettle Calciner #6	Modified 1997	UUU
EU25	BH14	Kettle Calciner #7	2000& Modified 2017	UUU
EU26	D1	Wallboard Dryer #1	1964	-
EU27	D2	Wallboard Dryer #2	1964	-
EU28	D3	Wallboard Dryer #3	1998	UUU
EU34	BH23	Accelerator Ball Mill	1997	OOO
EU40	BH21	Stucco Storage Bins	Modified 2011	OOO
EU44	BH26	Line A Accelerator Day Tank	1985	OOO
EU48	BH33	Line B Vermiculite Day Tank	1997	OOO
EU49	BH34	Line B Accelerator Day Tank	1997	OOO
EU53	BH25	Line A Mixing Screw	1995	-
EU55	BH29	Line B Mixing Screw	1997	-
EU56	BH27	Line A West End Saw	1978	-
EU57	BH28	Line A East End Saw	1978	-
EU60	BH30	Line B End Saw	1997	-
EU69	BH30	Grenzebach Dunnage Machine	2023	-
EU62	BH22	Stucco Cooler	Modified 2011	OOO
EU67	BH1	Crusher	2018	OOO
	BH2	Rotary Ore Dryer	2018	-

SECTION VI. EMISSIONS

Process Emissions

Estimated potential emissions are based on AP-42 emission factors from Table 11.19.2-2 (1/95), Table 11.12-2 (10/86), Table 11.16-2 (7/93), and Section 13.2.4 (1/95) using continuous operations, and a maximum process rate. Wallboard Dryer process emissions are based on 2007 stack test with a 25% extra allowance. Wallboard Dryer #3 is controlled using flue gas recirculation. Equipment with fabric filters is indicated (*).

Process Emissions

EU	Point	Equipment Name	Process Rate	Factor	PM ₁₀	
					lb/hr	TPY
EU1	FUG1	Rock Unloading	300 TPH	1.60E-05 lb/ton	0.00	0.02
EU5 & EU6	BH1&BH2	Rock Conveyor Belts (12) *	250 TPH	0.0014 lb/ton	4.20	18.40
EU9	R1	Rock Storage Bins *	250 TPH	0.0033 lb/ton	0.83	3.61
EU11	BH6	Raymond Roller Mill #1 *	14 TPH	0.12 lb/ton	1.68	7.36
EU12	BH7	Raymond Roller Mill #2 *	14 TPH	0.12 lb/ton	1.68	7.36
EU13	BH8	Raymond Roller Mill #3 *	14 TPH	0.12 lb/ton	1.68	7.36
EU14	BH9	Raymond Roller Mill #4 *	14 TPH	0.12 lb/ton	1.68	7.36
EU15	BH10	Raymond Roller Mill #5 *	14 TPH	0.12 lb/ton	1.68	7.36
EU16	BH11	Raymond Roller Mill #6 *	14 TPH	0.12 lb/ton	1.68	7.36
EU17	BH12	Raymond Roller Mill #7 *	43 TPH	0.12 lb/ton	5.16	22.60
EU18	BH13	Raymond Roller Mill #8 *	43 TPH	0.12 lb/ton	5.16	22.60
EU19	BH14	Kettle Calciner #1 *	26 TPH	0.006 lb/ton	0.16	0.68
EU20	BH15	Kettle Calciner #2 *	26 TPH	0.006 lb/ton	0.16	0.68
EU21	BH16	Kettle Calciner #3 *	26 TPH	0.006 lb/ton	0.16	0.68
EU22	BH18	Kettle Calciner #4 *	26 TPH	0.006 lb/ton	0.16	0.68
EU23	BH19	Kettle Calciner #5 *	26 TPH	0.006 lb/ton	0.16	0.68
EU24	BH20	Kettle Calciner #6 *	26 TPH	0.006 lb/ton	0.16	0.68
EU25	BH14	Kettle Calciner #7 *	35 TPH	0.006 lb/ton	0.21	0.92
EU26	D1	Wallboard Dryer #1	0.068 MMscf/hr	27.73 lb/MMscf	1.89	8.26
EU27	D2	Wallboard Dryer #2	0.068 MMscf/hr	27.73 lb/MMscf	1.89	8.26
EU28	D3	Wallboard Dryer #3	0.160 MMscf/hr	27.73 lb/MMscf	4.44	19.45
EU34	BH23	Accelerator Ball Mill *	1.0 TPH	- ^a	1.00	4.38
EU40	BH21	Stucco Storage Bins	156 TPH	0.0033 lb/ton	0.51	2.25
EU44	BH26	Line A Accelerator Day Tank	1 TPH	0.46 lb/ton	0.46	2.01
EU48	BH33	Line B Vermiculite Day Tank	2.5 TPH	0.46 lb/ton	1.15	5.04
EU49	BH34	Line B Accelerator Day Tank	1 TPH	0.46 lb/ton	0.46	2.01
EU53	BH25	Line A Mixing Screw	69 TPH	0.078 lb/ton	5.38	23.57
EU55	BH29	Line B Mixing Screw	86 TPH	0.078 lb/ton	6.71	29.38
EU56	BH27	Line A West End Saw *	0.037 TPH	5.7 lb/ton	0.21	0.92
EU57	BH28	Line A East End Saw *	0.037 TPH	5.7 lb/ton	0.21	0.92
EU60	BH30	Line B End Saw *	0.074 TPH	5.7 lb/ton	0.42	1.85
EU69	BH30	Grenzebach Dunnage Machine *	0.074 TPH	5.7 lb/ton	0.42	1.85
EU62	BH22	Stucco Cooler *	156 TPH	0.0033 lb/ton	0.51	2.25
EU67	BH1	Crusher ^b	250 TPH	0.005 lb/ton	1.25	5.48
	BH2	Rotary Ore Dryer ^b	250 TPH	0.005 lb/ton	1.25	5.48
EU68	FUG2	Fugitives from Building	0.25 TPH	6.26E-04 lb/ton	1.5E-04	<0.001
Totals					54.76	239.75

^a - PM emissions are based on a stack test conducted on September 26, 2007, with a generous safety factor to allow for process variations and full capacity.

^b - PM emissions are based on air flow, baghouse rated grain loading, and a safety factor.

Combustion Emissions

Combustion emissions are based on continuous operation and AP-42 (7/98), Tables 1.4-1 and 1.4-2 using a natural gas heating value of 1,000 BTU/SCF rather than 1,020 BTU/SCF as stated by AP-42. Wallboard Dryer #3 is controlled using flue gas recirculation.

Combustion Emissions

Equipment Name	Heat Input	NO _x		CO		SO ₂		PM ₁₀		VOC	
	MMBTUH	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Kettle Calciner #1	21	2.10	9.20	1.76	7.73	0.01	0.06	0.16	0.68	0.12	0.51
Kettle Calciner #2	21	2.10	9.20	1.76	7.73	0.01	0.06	0.16	0.68	0.12	0.51
Kettle Calciner #3	21	2.10	9.20	1.76	7.73	0.01	0.06	0.16	0.68	0.12	0.51
Kettle Calciner #4	21	2.10	9.20	1.76	7.73	0.01	0.06	0.16	0.68	0.12	0.51
Kettle Calciner #5	21	2.10	9.20	1.76	7.73	0.01	0.06	0.16	0.68	0.12	0.51
Kettle Calciner #6	21	2.10	9.20	1.76	7.73	0.01	0.06	0.16	0.68	0.12	0.51
Kettle Calciner #7	30	3.00	13.14	2.52	11.04	0.02	0.08	0.21	0.92	0.17	0.72
Wallboard Dryer #1	68	6.80	29.78	5.71	25.02	0.04	0.18	0.04	0.18	0.37	1.64
Wallboard Dryer #2	68	6.80	29.78	5.71	25.02	0.04	0.18	0.04	0.18	0.37	1.64
Wallboard Dryer #3 ^a	160	16.00	70.08	13.44	58.87	0.10	0.44	0.10	0.44	0.88	3.85
Rotary Ore Dryer	38	3.80	16.64	3.19	13.97	0.02	0.07	0.29	1.26	0.21	0.96
Totals		49.00	214.62	41.13	180.30	0.28	1.31	1.64	7.06	2.72	11.87

^a - PM emissions are based on stack test conducted on October 2, 2007, and a 25% safety factor.

Facility-Wide Emissions**Facility-Wide Emissions**

Equipment Name	NO _x		CO		SO ₂		PM ₁₀		VOC	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
Process Emissions	---	---	---	---	---	---	54.34	237.90	---	---
Combustion Emissions	49.00	214.62	41.13	180.30	0.28	1.31	1.64	7.06	2.72	11.87
Totals	49.00	214.62	41.13	180.30	0.28	1.31	55.98	244.96	2.72	11.87
Previous Totals	49.00	214.62	41.13	180.30	0.28	1.31	54.46	238.26	2.72	11.87
Differences	0.00	0.00	0.00	0.00	0.00	0.00	1.52	6.70	0.00	0.00

Hazardous Air Pollutants (HAP) Emissions

HAP emissions are estimated using AP-42 (7/98), Tables 1.4-3 and 1.4-4 for external natural gas combustion. Based on natural gas usage of 4,441 MMSCF per year, total HAP emissions are shown in the following table.

Pollutants*	Factor	Emissions
	lb/10 ⁶ SCF	TPY
Formaldehyde	7.5E-2	0.167
Benzene	2.1E-3	0.005
Dichlorobenzene	1.2E-3	0.003

Pollutants*	Factor	Emissions
	lb/10 ⁶ SCF	TPY
Toluene	3.4E-3	0.008
Cadmium	1.1E-3	0.002
Chromium	1.4E-3	0.003
Nickel	2.1E-3	0.005
Total		0.193

* Only pollutants with factors greater than 1.0E-03 are listed.

The applicant requested to establish HAP emission limits as less than 10 TPY for each pollutant and 25 TPY for total HAP emissions.

SECTION VII. INSIGNIFICANT ACTIVITIES

The insignificant activities identified and justified in the application are duplicated below. Appropriate recordkeeping of activities indicated below with a “*” is specified in the Specific Conditions.

1. Space heaters, boilers, process heaters and emergency flares less than or equal to 5 MMBTU/hr heat input (commercial natural gas). This facility has 24 space heaters rated at 95,000 Btu/hr for a total of 2,280,000 BTU/hr which is less than the 5 MMBTU/hr limit.
2. * Bulk gasoline or other fuel distribution with a daily average throughput less than 2,175 gallons per day, including dispensing, averaged over a 30-day period. This facility has one 10,000-gallon diesel tank for plant vehicles.
3. * For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant. Emissions from the small engines (EU63-EU66) used for welding will have actual emissions of less than 5 TPY. They are regularly moved throughout the facility to perform maintenance, but remain within the property boundaries. These engines are mounted on wheels and are not stationary sources of emissions, because they do not remain in a single location for over 12-months. Other activities may be used and identified in the future.

SECTION VIII. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]
Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the “Federal Regulations” section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]
Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-5 (Registration, Emission Inventory, and Annual Operating Fees) [Applicable]
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories have been submitted and fees paid for the past years.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]
Part 5 includes the general administrative requirements for part 70 permits. Any planned changes in the operation of the facility which result in emissions not authorized in the permit and which exceed the “Insignificant Activities” or “Trivial Activities” thresholds require prior notification to AQD and may require a permit modification. Insignificant activities mean individual emission units that either are on the list in Appendix I (OAC 252:100) or whose actual calendar year emissions do not exceed the following limits:

1. 5 TPY of any one criteria pollutant; or
2. 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAP or 20% of any threshold less than 10 TPY for a HAP that the EPA may establish by rule.

Emissions limitations (lb/hr and TPY) have been incorporated from the previously-issued permits and from the application.

OAC 252:100-9 (Excess Emissions Reporting Requirements) [Applicable]
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63.

OAC 252:100-13 (Open Burning) [Applicable]
Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter) [Applicable]
This subchapter specifies a particulate matter (PM) emission limitation of 0.6 lb/MMBTU from existing fuel-burning equipment with a rated heat input of 10 MMBTUH or less. For fuel-burning equipment greater than 10 MMBTUH but less than 1,000 MMBTUH, this subchapter specifies a PM emission limitation (E) based on the heat input of the equipment (X) and calculated using the equation from Appendix C ($E = 1.042808X^{-0.238561}$). The heat input, calculated PM emission limitation, and expected emissions from all of the fuel-burning equipment are shown in the following table.

PM Emission Limits for Combustion Emission Units

EU	Point	Description	Heat Input (MMBTU)	Emission Limits (lb/MMBTU)	PM Emissions (lb/MMBTU)
EU19	BH14	Kettle Calciner #1	21	0.50	0.01
EU20	BH15	Kettle Calciner #2	21	0.50	0.01
EU21	BH16	Kettle Calciner #3	21	0.50	0.01
EU22	BH18	Kettle Calciner #4	21	0.50	0.01
EU23	BH19	Kettle Calciner #5	21	0.50	0.01
EU24	BH20	Kettle Calciner #6	21	0.50	0.01
EU25	BH14	Kettle Calciner #7	30	0.46	0.01
EU26	D1	Wallboard Dryer #1	68	0.38	0.01
EU27	D2	Wallboard Dryer #2	68	0.38	0.01
EU28	D3	Wallboard Dryer #3	160	0.31	0.03
EU67	BH2	Rotary Ore Dryer	38	0.44	0.30

This subchapter also limits emissions of PM from directly fired fuel-burning units and industrial processes based on their process weight rates. For process rates up to 60,000 lb/hr (30 TPH), the emission rate in pounds per hour (E) is not to exceed the rate calculated using the process weight rate in tons per hour (P) and the formula in Appendix G ($E = 4.10 \cdot P^{(0.67)}$). For process rates greater than 60,000 lb/hr (30 TPH), the emission rate in pounds per hour (E) is not to exceed the rate calculated using the process weight rate in tons per hour (P) and the formula in Appendix G ($E = (55.0 \cdot P^{(0.11)}) - 40$). Listed in the following table are the process weight rates, the estimated emissions, and the allowable emission limits. Estimated emissions are based on operation with air pollution controls. The permit will require that the following processes marked with a * are operated with baghouses or other filters and that the filters are properly maintained to ensure compliance with Subchapter 19.

PM Emission Limits for Process Emission Units

EU	Point	Description	Process Rate TPH	Emission Limits lb/hr	PM Emissions lb/hr
EU1	FUG1	Rock Unloading	300	63.00	0.02
EU5&6	FUG2 & BH1	Rock Conveyor Belts (12)*	250	60.96	4.20
EU9	R1	Rock Storage Bins*	250	60.96	0.83
EU11	BH6	Raymond Roller Mill #1*	14	24.03	1.68
EU12	BH7	Raymond Roller Mill #2*	14	24.03	1.68
EU13	BH8	Raymond Roller Mill #3*	14	24.03	1.68
EU14	BH9	Raymond Roller Mill #4*	14	24.03	1.68
EU15	BH10	Raymond Roller Mill #5*	14	24.03	1.68
EU16	BH11	Raymond Roller Mill #6*	14	24.03	1.68
EU17	BH12	Raymond Roller Mill #7*	43	43.18	5.16
EU18	BH13	Raymond Roller Mill #8*	43	43.18	5.16

EU	Point	Description	Process Rate TPH	Emission Limits lb/hr	PM Emissions lb/hr
EU19	BH14	Kettle Calciner #1 *	26	36.38	0.16
EU20	BH15	Kettle Calciner #2 *	26	36.38	0.16
EU21	BH16	Kettle Calciner #3 *	26	36.38	0.16
EU22	BH18	Kettle Calciner #4 *	26	36.38	0.16
EU23	BH19	Kettle Calciner #5 *	26	36.38	0.16
EU24	BH20	Kettle Calciner #6 *	26	36.38	0.16
EU25	BH14	Kettle Calciner #7 *	35	44.39	0.21
EU34	BH23	Accelerator Ball Mill*	0.44	2.37	1.00
EU40	BH21	Stucco Storage Bins	156	55.85	0.51
EU44	BH26	Line A Accelerator Day Tank	1	4.10	0.46
EU48	BH33	Line B Vermiculite Day Tank	2.5	7.58	1.15
EU49	BH34	Line B Accelerator Day Tank	1	4.10	0.46
EU53	BH25	Line A Mixing Screw	69	47.63	5.38
EU55	BH29	Line B Mixing Screw	86	49.78	6.71
EU56	BH27	Line A West End Saw*	0.037	0.45	0.21
EU57	BH28	Line A East End Saw*	0.037	0.45	0.21
EU60	BH30	Line B End Saw *	0.074	0.42	1.85
EU69	BH30	Grenzebach Dunnage Machine*	0.074	0.72	0.42
EU62	BH22	Stucco Cooler *	156	55.85	0.51
EU67	BH1	Crusher *	250	60.96	1.25
	BH2	Rotary Ore Dryer	250	60.96	1.25
EU68	FUG2	Fugitives from Building	0.25	1.62	1.5E-04

OAC 252:100-25 (Visible Emissions and Particulate Matter) [Applicable]

No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. When burning natural gas there is little possibility of exceeding the opacity standards.

The following emission units are subject to Subchapter 25:

EU	Point	Make/Model
EU1	FUG1	Rock Unloading
EU2	FUG2	Hopper and Feed Belt
EU5	BH1	Rock Belt Conveyor
EU9	R1	Rock Storage Bins

EU	Point	Make/Model
EU11	BH6	Raymond Roller Mill #1
EU12	BH7	Raymond Roller Mill #2
EU13	BH8	Raymond Roller Mill #3
EU26	D1	Wallboard Dryer #1
EU27	D2	Wallboard Dryer #2
EU53	BH25	Line A Mixing Screw
EU55	BH29	Line B Mixing Screw
EU56	BH27	Line A West End Saw
EU57	BH28	Line A East End Saw
EU69	BH30	Dunnage Machine

Units subject to an opacity limit under NSPS are exempt from this subchapter. Most processes which generate particulate emissions are controlled by fabric filters (baghouses). Water sprays are used to control emissions from unpaved haul roads. Indoor areas are frequently vacuumed cleaned to remove particulates from floors. The permit requires periodic inspection of filter performance and visible emission observations to confirm compliance with Subchapter 25.

OAC 252:100-29 (Fugitive Dust)

[Applicable]

No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. The permit will require the facility to take reasonable precautions to prevent causing a problem in this area.

OAC 252:100-31 (Sulfur Compounds)

[Applicable]

Part 5 limits sulfur dioxide emissions from new fuel-burning equipment (constructed after July 1, 1972). For gaseous fuels, the limit is 0.20 lb/MMBTU heat input averaged over 3 hours. For fuel gas having a gross calorific value of approximately 1,050 BTU/SCF, this limit corresponds to fuel sulfur content of approximately 1,263 ppmv. This permit requires the use of commercial natural gas to ensure compliance with Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides)

[Applicable]

NO_x emissions are limited to 0.20 lb/MMBTU from all new gas-fired fuel-burning equipment with a rated heat input of 50 MMBTUH or greater. EU28 is subject to this requirement and is in compliance with NO_x emissions of 0.1 lb/MMBTU. EU26 & EU27 were installed before Air Quality Rules and have not been altered, replaced, or rebuilt and thus qualify for “grandfathered” status, therefore, no numerical emission limits shall be applied to these emission units but they shall be limited to the existing equipment.

OAC 252:100-35 (Carbon Monoxide)

[Not Applicable]

This facility has none of the affected sources: gray iron cupola, blast furnace, basic oxygen furnace, petroleum catalytic cracking unit, or petroleum catalytic reforming unit.

OAC 252:100-37 (Volatile Organic Compounds) [Part 7 Applicable]

Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and containing a VOC with a vapor pressure greater than 1.5 psia at maximum storage temperature to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The storage tanks containing diesel, hydraulic oil, and lube oil have vapor pressures below the 1.5 psia de minimis level.

Part 3 requires loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. The facility loads cars and pickup trucks, both of which have fuel tanks smaller than 200 gallons. Therefore, this requirement is not applicable.

Part 5 limits the VOC content of coatings used in coating operations. This facility does not normally conduct coating or painting operations except for routine maintenance of the facility and equipment which is exempt.

Part 7 requires fuel-burning equipment to be cleaned, operated, and maintained so as to minimize VOC emissions. Based on manufacturer's data and good engineering practice, the equipment must not be overloaded and temperature and available air must be sufficient to provide essentially complete combustion. The equipment at this location is subject to this requirement.

OAC 252:100-42 (Toxic Air Contaminants (TAC)) [Applicable]

This subchapter regulates TAC that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping) [Applicable]

This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

The following Oklahoma Air Pollution Control Rules are not applicable to this facility:

OAC 252:100-7	Permits for Minor Sources	not in source category
OAC 252:100-11	Alternative Emissions Reduction	not requested

OAC 252:100-17	Incinerators	not type of emission unit
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Grain Elevators	not in source category
OAC 252:100-39	Nonattainment Areas	not in area category
OAC 252:100-47	Municipal Solid Waste Landfills	not in area category

SECTION IX. FEDERAL REGULATIONS

PSD, 40 CFR Part 52

[Not Applicable]

Final total emissions are less than the PSD major source threshold of 250 TPY of any single regulated NSR pollutant and the facility is not one of the 26 specific industries with a threshold of 100 TPY.

NSPS, 40 CFR Part 60

[Subparts OOO and UUU are Applicable]

Subpart Db, Industrial-Commercial-Institutional Steam Generating Units. This subpart affects steam generating units with a heat input capacity greater than 100 MMBTUH and that commence construction, modification, or reconstruction after June 19, 1984. Process heaters are not subject to this subpart. Process heater means a device that is primarily used to heat a material to initiate or promote a chemical reaction in which the material participates as a reactant or catalyst. All of the heaters at this facility are considered process heaters.

Subpart Dc, Small Industrial-Commercial-Institutional Steam Generating Units. This subpart affects steam generating units with a heat input capacity between 10 and 100 MMBTUH and that commences construction, modification, or reconstruction after June 9, 1989. Process heaters are not subject to this subpart.

Subpart OOO, Nonmetallic Minerals Processing Plants. This subpart affects facilities of nonmetallic minerals processing plant that commenced construction, reconstruction, or modification after August 31, 1983, with a capacity greater than 25 TPH. The affected facilities are each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station. Where nonmetallic minerals are transferred from a belt conveyor to a stockpile is not considered a transfer point and is not subject to this subpart. Truck dumping of nonmetallic minerals into any screening operation, feed hopper, or crusher is also exempt from this subpart.

Affected facilities must meet the stack emission limits and compliance requirements in Table 2 of this subpart and the fugitive emission limits and compliance requirements in Table 3 of this subpart. The requirements in Table 2 of this subpart apply for affected facilities with capture systems used to capture and transport particulate matter to a control device. The requirements in Table 3 of this subpart apply for fugitive emissions from affected facilities without capture systems and for fugitive emissions escaping capture systems. If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affected facility must comply with the emission limits in Table 2 or Table 3 of this subpart or the building enclosing the affected facility or facilities must comply with the following emission limits:

1. Fugitive emissions from the building openings (except for vents as defined in § 60.671) must not exceed 7 percent opacity; and

2. Vents (as defined in § 60.671) in the building must meet the applicable stack emission limits and compliance requirements in Table 2 of this subpart.

Table 2 to Subpart OOO Requirements for Affected Facilities with Capture Systems

For Affected Facilities That Commenced Construction, Modification, or Reconstruction	PM Limit gr/DSCF	Opacity Limit	Compliance Requirements
After August 31, 1983 but before April 22, 2008	0.022	7% ¹	Monitoring of wet scrubber parameters.
After April 22, 2008	0.014	NA	Monitoring of wet scrubber parameters and baghouses.

¹ - for dry control devices.

Table 3 to Subpart OOO Requirements for Fugitive Emissions

For Affected Facilities That Commenced Construction, Modification, or Reconstruction	Fugitive Opacity Limit	Fugitive Opacity Limit For Crushers W/O Capture System	Compliance Requirements
After August 31, 1983 but before April 22, 2008	10%	15%	Initial testing only.
After April 22, 2008	7%	12%	Initial testing and periodic inspections of water sprays; and
			Periodic testing within 5 years from previous testing for fugitive emissions from affected facilities w/o water sprays. ¹

¹ - Affected facilities controlled by water carryover from upstream water sprays that are inspected according to this subpart are exempt from this 5-year repeat testing requirement.

American Gypsum Company previously contracted with Air Hygiene, Inc., to perform Method 9 testing for opacity of process fugitive emissions at the maximum hourly throughput and the results showed that the facility was in compliance. The baghouse controlling emissions from material handling associated with the cooler is subject to the PM emission limit 0.014 gr/DSCF. The permit will require compliance with all applicable requirements. The crusher (EU67) is subject to this subpart due to the replacement crusher. The combine unit exhaust will meet the requirements of Subpart OOO.

Subpart UUU, Calciners and Dryers in Mineral Industries. This subpart affects calciners and dryers that commence construction, modification, or reconstruction after April 23, 1986. Feed and product conveyors are not considered part of the affected facility. Tunnel kilns, tunnel dryers, apron dryers, and grinding equipment that dries process material are not subject to this subpart. This subpart prohibits discharge of particulate matter in excess of 0.04 gr/DSCF from calciners and calciners and dryers in series and 0.025 gr/DSCF from dryers. This subpart also prohibits discharges in excess of 10% opacity except for discharges from affected facilities using a wet scrubber.

Dry control devices used to comply with this subpart shall install, calibrate, maintain, and operate a continuous opacity monitor. Wet scrubbers used to comply with this subpart shall install, calibrate, maintain, and operate monitoring devices that continuously measure and record the pressure loss of the gas stream through the scrubber and the scrubbing liquid flow rate to the scrubber. Gypsum rotary dryers, flash calciners, and kettle calciners that use a dry control device are exempt from the monitoring requirements of this subpart.

The Rotary Ore Dryer (EU67) is specifically exempted from this subpart by section 60.730. All of the Kettle Calciners (EU19 - EU25) were either constructed, reconstructed, or modified after the applicability date and are subject to this subpart. Only one of the Wallboard Dryers (EU28) was constructed, reconstructed or modified after the applicability date and is subject to this subpart. The permit will require compliance with all applicable requirements.

Subpart IIII, Stationary Compression Ignition (CI) Internal Combustion Engines (ICE). This subpart affects CI ICE manufactured after 2007. There are no stationary CI ICE manufactured after 2007 at this facility.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI CE). There are several small (rated at less than or equal to 23-hp) engines on-site. These are used for such maintenance functions as generators, spray painting, air compressor, welders, etc. all are “non-road mobile” and are skid-mounted or on wheels to be transported around the facility as needed. As such they are not subject to the stationary RICE subparts.

NESHAP, 40 CFR Part 61

[Not Applicable]

There are no emissions of any of the regulated pollutants: arsenic, asbestos, benzene, beryllium, coke oven emissions, mercury, radionuclides or vinyl chloride except for trace amounts of benzene. Subpart J, Equipment Leaks of Benzene, only affects process streams which contain more than 10% benzene by weight. All process streams at this facility are below this threshold.

NESHAP, 40 CFR Part 63

[Not Applicable]

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects RICE located at area and major sources of HAP. The small engines (EU63-EU66) used for welding are considered non-road engines. They are regularly moved throughout the facility to perform maintenance, but remain within the property boundaries. These engines are mounted on wheels and are not stationary sources of emissions, because they do not remain in a single location for over 12-months. Therefore, the engines are not subject to this subpart.

Subpart JJJJJJ, Industrial, Commercial, and Institutional Boilers – Area Sources. This subpart affects new and existing boilers located at area sources of HAP, except for gas-fired boilers. Gas fired boilers are defined as any boiler that burns gaseous fuel not combined with any solid fuels, liquid fuel only during periods of gas curtailment, gas supply emergencies, or periodic testing on liquid fuel. There are no affected boilers at this facility.

CAM, 40 CFR Part 64

[Applicable]

Compliance Assurance Monitoring (CAM) applies to any pollutant specific emission unit at a major source, which is required to obtain a Title V permit, if it meets all of the following criteria:

1. It is subject to an emission limit or standard for an applicable regulated air pollutant;
2. It uses a control device to achieve compliance with the applicable emission limit or standard; and
3. It has potential emissions, prior to the control device, of the applicable regulated air pollutant greater than the major source thresholds.

CAM applies to the particulate matter control devices for sources that exhaust outside the building enclosure. Monitoring requirements are listed in specific conditions.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]
This facility does not store any regulated substance above the applicable threshold limits. More information on this federal program is available at the web site: <http://www.epa.gov/rmp>.

Stratospheric Ozone Protection, 40 CFR Part 82 [Subparts A and F are Applicable]
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.

Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction.

Conditions are included in the standard conditions of the permit to address the requirements specified at §82.156 for persons opening appliances for maintenance, service, repair, or disposal; §82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; §82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; §82.166 for recordkeeping; § 82.158 for leak repair requirements; and §82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

SECTION X. COMPLIANCE

Tier classification

This application has been classified as **Tier II** based on the request for renewal of a Part 70 Operating Permit. The applicant has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the land.

The applicant published a “Notice of Filing a Tier II Application” in the *Altus Times* a bi-weekly newspaper in Jackson County. The notice appeared in the newspaper on March 22, 2024. The notice stated that the application was available for public review at the Altus Public Library located at 421 North Hudson, Altus, Oklahoma and that the application was also available for public review at the Air Quality Division main office.

Public Review

The applicant will publish a “Notice of Tier II Draft Permit.” The draft permit will also be available for public review on the Air Quality section of the DEQ web page at <http://www.deq.ok.gov>.

State Review

This facility is located within 50 miles of the Oklahoma border with the state of Texas. The State of Texas will be notified of the draft permit.

EPA Review

The proposed permit will be submitted to EPA Region 6 for a 45-day review period.

Inspection

The Specific Conditions of this permit contain various monitoring, recordkeeping, and reporting requirements in order to document on-going compliance with emission limits. The specific method used to document compliance was based on the type of emission unit, the type of process equipment, the specific pollutants emitted, and the amount of permitted emissions taking into account other regulatory requirements that an emission unit may be subject to.

In addition to the permitting requirements, the following periodic inspections were conducted since issuance of the last Title V renewal permit.

Inspection Type	Date	Summary/Results
Full Inspection	11/15/2022	Two noncompliance issues were identified during this inspection, which were resolved in Enforcement Case ID 10969.
Full Inspection	5/7/2021	Noncompliance issues were not identified during this inspection.

The following enforcement cases were opened since issuance of the last Title V renewal permit.

Enforcement ID	Date Opened	Date Closed	Summary/Results
12913	7/8/2024	---	American Gypsum Company reported the following noncompliance issues in the Disclosure of Violation submitted to DEQ on May 24, 2022 for the Gypsum Wallboard Plant during their audit conducted in accordance with the Audit Privilege Act: <ol style="list-style-type: none">Failed to maintain natural gas usage in correct units,

			<ol style="list-style-type: none"> 2. Failed to show documentation with sulfur content of natural gas, 3. Failed to maintain records of emission limits (lb/hr) in monthly and 12-month rolling totals, 4. Failed to conduct each Method 22 visual observation for EU1, EU26, and EU27 for a duration of six minutes. 5. Failed to compare the baghouse differential pressure gauges to a U-tube manometer annually and failed to maintain records of these comparisons 6. Failed to document differential pressure readings on a daily basis and not reporting all excursions of the daily differential pressure readings. 7. Failed to retain proof of submitting the 2019 and 2020 Annual Compliance Certifications (“ACCs”), and by not submitting the ACC for the reporting period of November 4, 2020 through November 3, 2021, prior to the end of the reporting period. 8. Failed to include all the deviations that occurred at the Facility in 2000 and 2021 Semiannual Reports (“SARs”), and by submitting the SAR for the reporting period of May 4, 2021 through November 3, 2021, prior to the ending of the reporting period. 9. Failed to notify DEQ before making equipment changes.
10969	3/6/2023	7/11/2023	Failure to submit a complete and accurate emissions inventory for 2020 and failure to submit a timely SAR.

There have been no other enforcement actions since issuance of the last Title V renewal permit.

Performance Testing

The original Title V permit (Permit No. 99-111-TV) required that, during the permit term, the permittee shall conduct performance testing of the discharges from EU 14, 15, 16, 25, 28 and 34 which are subject to either Subpart OOO or Subpart UUU and furnish a written report to AQD documenting compliance with emissions limitations. Performance testing has been conducted by METCO on these units and results are tabulated in the following table. All units tested are in compliance with applicable limitations. The initial emission test was conducted on the Stucco

Cooler on October 15, 2014 and the following results show that the Stucco Cooler is in compliance with the PM limits.

Tested Units	PM Permit Limits			PM Test Results			Testing Date
	lb/hr	gr/dscf	Opacity	lb/hr	gr/dscf	Opacity	
Raymond Roller Mill #4	1.68	0.022	7%	0.06	0.004	0.2%	9/20/07
Raymond Roller Mill #5	1.68	0.022	7%	0.14	0.01	0%	9/20/07
Raymond Roller Mill #6	1.68	0.022	7%	0.07	0.0048	0.3%	9/19/07
Kettle Calciner #7	0.21	0.04	10%	0.1	0.015	4.4	10/2/07
Accelerator Ball Mill	0.01	0.022	7%	0.01	0.0014	0.2%	9/26/07
Stack 3-1	1.22	0.04	10%	3.55	0.013	0%	10/2/07
Stack 3-2		0.04	10%		0.009	0.1%	
Stack 3-3		0.04	10%		0.005	0.2%	
Stack 3-4	1.22	0.04	10%	3.55	0.002	0.2%	10/2/07
Stack 3-5A		0.04	10%		0.004	0.9%	
Stack 3-5B		0.04	10%		0.005	0.9%	
Stucco Cooler	0.51	0.014	7%	0.40	0.0081	0%	10/15/14

Fee Paid

The applicant submitted the \$7,500 fee required for renewal of an operating permit for a Part 70 source.

SECTION XI. SUMMARY

The facility was constructed and is operating as described in the permit application. Ambient air quality standards are not threatened at this site. There are no active Air Quality compliance or enforcement issues concerning this facility that would prohibit issuance of the permit. Issuance of the permit is recommended, contingent on public and EPA review.

**PERMIT TO OPERATE
AIR POLLUTION CONTROL FACILITY
SPECIFIC CONDITIONS**

**American Gypsum Company, LLC
Gypsum Wallboard Plant**

Permit Number 2024-0107-TV4

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on February 21, 2024. The Evaluation Memorandum dated February 14, 2025, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating permit limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Points of emissions and emission limitations for those points:

Equipment Installed Prior to 1970:

Process Sources

These emission units were installed prior to 1970 and predate NSPS Subpart OOO. They are limited to the existing equipment as it is with the following limits to comply with OAC 252:100-19.

EU	Point	Make/Model	Installed Date	Process Rates (TPH)	PM₁₀ (lb/hr)
EU1	FUG1	Rock Unloading	1964	300	63.00
EU9	R1	Rock Storage Bins*	1964	250	60.96
EU11	BH6	Raymond Roller Mill #1*	1964	14	24.03
EU12	BH7	Raymond Roller Mill #2*	1964	14	24.03
EU13	BH8	Raymond Roller Mill #3*	1964	14	24.03

Note: * indicates equipment with fabric filters or equivalent control devices

- A. The baghouse(s) associated with EU9, EU11, EU12, and EU13 shall be operated in the pressure differential range per manufacturer specifications. At least once daily, the permittee shall record the pressure differential on any baghouse serving EU9, EU11, EU12, and EU13; and
- B. The permittee shall conduct Method 9 or Method 22 visual observations of emissions from EU1 at least once per week during which a unit operates. In no case shall the observation period be less than six minutes in duration. If visible emissions are observed for six minutes in duration for any observation period and such emissions are not the result of a malfunction, then the permittee shall conduct, for the identified points, within 24 hours, a visual observation of emissions, in accordance with 40 CFR Part 60, Appendix A, Method 9.
 - 1) When four consecutive weekly visible emission observations or Method 9 observations show no visible emissions, or no emissions of a shade or density greater than twenty (20) percent equivalent opacity, respectively, the frequency may be reduced to monthly visual

observations, as above. Upon any showing of non-compliance the observation frequency shall revert to weekly.

- 2) If a Method 9 observation exceeds 20% opacity the permittee shall conduct at least three additional Method 9 observations within the next 24-hours.
- 3) If more than one six-minute Method 9 observation exceeds 20% opacity in any consecutive 60 minutes; or more than three six-minute Method 9 observations in any consecutive 24 hours exceeds 20% opacity; or if any six-minute Method 9 observation exceeds 60% opacity; the owner or operator shall comply with the provisions for excess emissions during start-up, shutdown, and malfunction of air pollution control equipment.

[OAC 252:100-25]

- C. Compliance with the specified emission limitations shall be based on the use of AP-42 emission factors and the process rates referenced in the previous table, along with the records of proper fabric filter maintenance for units indicated with“*”.

Combustion Sources

These emission units were installed prior to 1970 and predate NSPS Subpart UUU.

PM Emission Limits

EU	Point	Make/Model	Installed Date	Heat Input (MMBTUH)
EU26	D1	Wallboard Dryer #1	1964	68
EU27	D2	Wallboard Dryer #2	1964	68

- A. The permittee shall conduct Method 9 or Method 22 visual observations of emissions from EU26 and EU27 at least once per week during which a unit operates. In no case shall the observation period be less than six minutes in duration. If visible emissions are observed for six minutes in duration for any observation period and such emissions are not the result of a malfunction, then the permittee shall conduct, for the identified points, within 24 hours, a visual observation of emissions, in accordance with 40 CFR Part 60, Appendix A, Method 9.
- 1) When four consecutive weekly visible emission observations or Method 9 observations show no visible emissions, or no emissions of a shade or density greater than twenty (20) percent equivalent opacity, respectively, the frequency may be reduced to monthly visual observations, as above. Upon any showing of non-compliance the observation frequency shall revert to weekly.
 - 2) If a Method 9 observation exceeds 20% opacity the permittee shall conduct at least three additional Method 9 observations within the next 24-hours.
 - 3) If more than one six-minute Method 9 observation exceeds 20% opacity in any consecutive 60 minutes; or more than three six-minute Method 9 observations in any consecutive 24 hours exceeds 20% opacity; or if any six-minute Method 9 observation exceeds 60% opacity; the owner or operator shall comply with the provisions for excess emissions during start-up, shutdown, and malfunction of air pollution control equipment.

[OAC 252:100-25]

Equipment Installed After 1970:Sources not Subject to NSPS**PM Emissions Limits**

EU	Point	Equipment Name	Process Rate (TPH)	PM ₁₀	
				(lb/hr)	(TPY)
EU5	BH1	Rock Conveyor Belts *	250	4.20	18.40
EU53	BH25	Line A Mixing Screw	69	5.38	23.57
EU56	BH27	Line A West End Saw *	0.037	0.21	0.92
EU57	BH28	Line A East End Saw *	0.037	0.21	0.92
EU55	BH29	Line B Mixing Screw	86	6.71	29.38
EU60	BH30	Line B End Saw *	0.074	0.42	1.85
EU69	BH30	Grenzebach Dunnage Machine *	0.074	0.42	1.85
EU67	BH2	Rotary Ore Dryer	250	1.25	5.48

- A. All air discharges from the above units with * shall be processed by fabric filters (baghouses) or equivalent PM emissions control devices. [OAC 252:100-19 & 25]
- B. The baghouse(s) associated with the emission units above, except EU5, shall be operated in the pressure differential range per manufacturer specifications. At least once weekly, the permittee shall record the pressure differential on any baghouse serving an above-listed operation; or
- C. The permittee shall conduct Method 9 or Method 22 visual observations of emissions from each stack listed above, except EU5, at least once per week during which a unit operates. In no case shall the observation period be less than six minutes in duration. If visible emissions are observed for six minutes in duration for any observation period and such emissions are not the result of a malfunction, then the permittee shall conduct, for the identified points, within 24 hours, a visual observation of emissions, in accordance with 40 CFR Part 60, Appendix A, Method 9.
- 1) When four consecutive weekly visible emission observations or Method 9 observations show no visible emissions, or no emissions of a shade or density greater than twenty (20) percent equivalent opacity, respectively, the frequency may be reduced to monthly visual observations, as above. Upon any showing of non-compliance the observation frequency shall revert to weekly.
 - 2) If a Method 9 observation exceeds 20% opacity the permittee shall conduct at least three additional Method 9 observations within the next 24-hours.
 - 3) If more than one six-minute Method 9 observation exceeds 20% opacity in any consecutive 60 minutes; or more than three six-minute Method 9 observations in any consecutive 24 hours exceeds 20% opacity; or if any six-minute Method 9 observation exceeds 60% opacity; the owner or operator shall comply with the provisions for excess emissions during start-up, shutdown, and malfunction of air pollution control equipment.

- D. Compliance with the specified emission limitations shall be based on the use of AP-42 emission factors and the process rates referenced in the previous table, along with the records of proper fabric filter maintenance for all units in the table above. [OAC 252:100-25]

Sources Subject to NSPS Subpart OOO

PM Emission Limits

EU	Point	Equipment Name	NSPS	PM ₁₀	
			Subpart	(lb/hr)	(TPY)
EU 6	BH2	Rock Conveyor Belts *	OOO	3.90	17.07
EU14	BH9	Raymond Roller Mill #4 *	OOO	1.68	7.36
EU15	BH10	Raymond Roller Mill #5 *	OOO	1.68	7.36
EU16	BH11	Raymond Roller Mill #6 *	OOO	1.68	7.36
EU17	BH12	Raymond Roller Mill #7 *	OOO	5.16	22.60
EU18	BH13	Raymond Roller Mill #8 *	OOO	5.16	22.60
EU34	BH23	Accelerator Ball Mill *	OOO	1.00	4.38
EU40	BH21	Stucco Storage Bins	OOO	0.51	2.25
EU44	BH26	Line A Accelerator Day Tank	OOO	0.46	2.01
EU49	BH34	Line B Accelerator Day Tank	OOO	0.46	2.01
EU48	BH33	Line B Vermiculite Day Tank	OOO	1.15	5.04
EU62	BH22	Stucco Cooler *	OOO	0.51	2.25
EU67	BH1	Crusher	OOO	1.16	5.08

- A. All air discharges from the above units with * shall be processed by fabric filters (baghouses) or equivalent PM emissions control devices. [OAC 252:100-19 & 25]
- B. The baghouse(s) associated with the EU67 shall be operated in the pressure differential range per manufacturer specifications. At least once weekly, the permittee shall record the pressure differential on any baghouse serving an above-listed operation; or
- C. The permittee shall comply with NSPS, 40 CFR Part 60, Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants, for the affected facilities in this group including but not limited to: [40 CFR Part 60, Subpart OOO]
- 1) § 60.670 Applicability and designation of affected facility.
 - 2) § 60.671 Definitions.
 - 3) § 60.672 Standard for particulate matter (PM).
 - a) Affected facilities must meet the stack emission limits and compliance requirements in Table 2 of 40 CFR Part 60, Subpart OOO. The requirements in Table 2 of 40 CFR Part 60, Subpart OOO apply for affected facilities with capture systems used to capture and transport particulate matter to a control device. [§ 60.672(a)]
 - i) For affected facilities that commenced construction, modification, or reconstruction after August 31, 1983 but before April 22, 2008, the owner or operator must meet a PM limit of 0.05 g/DSCM (0.022 gr/DSCF) and an opacity limit of 7% for dry control devices. [Table 2 of 40 CFR Part 60, Subpart OOO]

- ii) For affected facilities that commence construction, modification, or reconstruction on or after April 22, 2008, the owner or operator must meet a PM limit of 0.032 g/DSCM (0.014 gr/DSCF).
[Table 2 of 40 CFR Part 60, Subpart OOO]
- b) Affected facilities must meet the fugitive emission limits and compliance requirements in Table 3 of 40 CFR Part 60, Subpart OOO. The requirements in Table 3 of 40 CFR Part 60, Subpart OOO apply for fugitive emissions from affected facilities without capture systems and for fugitive emissions escaping capture systems. [§ 60.672(b)]
 - i) For affected facilities that commenced construction, modification, or reconstruction after August 31, 1983 but before April 22, 2008,
 - I. The owner or operator must meet the following fugitive emissions limit for grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, bagging operations, storage bins, enclosed truck or railcar loading stations or from any other affected facility 10% opacity; and
 - II. The owner or operator must meet the following fugitive emissions limit for crushers at which a capture system is not used 15% opacity.
[Table 3 of 40 CFR Part 60, Subpart OOO]
 - ii) For affected facilities that commence construction, modification, or reconstruction on or after April 22, 2008,
 - I. The owner or operator must meet the following fugitive emissions limit for grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, bagging operations, storage bins, enclosed truck or railcar loading stations or from any other affected facility 7% opacity; and
 - II. The owner or operator must meet the following fugitive emissions limit for crushers at which a capture system is not used 12% opacity.
[Table 3 of 40 CFR Part 60, Subpart OOO]
- c) If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affected facility must comply with the emission limits in § 60.672(a) and (b), or the building enclosing the affected facility or facilities must comply with the following emission limits: [§ 60.672(e)]
 - i) Fugitive emissions from the building openings (except for vents) must not exceed 7% opacity; and [§ 60.672(e)(1)]
 - ii) Vents in the building must meet the applicable stack emission limits and compliance requirements in Table 2 of 40 CFR Part 60, Subpart OOO. [§ 60.672(e)(2)]
- 4) § 60.673 Reconstruction.
- 5) § 60.674 Monitoring of operations.
- 6) § 60.675 Test methods and procedures.
- 7) § 60.676 Reporting and recordkeeping.
- 8) Table 1 to Subpart OOO - Exceptions to Applicability of Subpart A to Subpart OOO
- 9) Table 2 to Subpart OOO - Stack Emission Limits for Affected Facilities With Capture Systems
- 10) Table 3 to Subpart OOO - Fugitive Emission Limits

Sources Subject to NSPS Subpart UUU

PM Emission Limits

EU	Equipment Name	NSPS	Heat Input	PM ₁₀	
		Subpart	(MMBTUH)	(lb/hr)	(TPY)
EU19	Kettle Calciner #1 *	UUU	21	0.16	0.70
EU20	Kettle Calciner #2 *	UUU	21	0.16	0.70
EU21	Kettle Calciner #3 *	UUU	21	0.16	0.70
EU22	Kettle Calciner #4 *	UUU	21	0.16	0.70
EU23	Kettle Calciner #5 *	UUU	21	0.16	0.70
EU24	Kettle Calciner #6 *	UUU	21	0.16	0.70
EU25	Kettle Calciner #7 *	UUU	30	0.23	1.00
EU28	Wallboard Dryer #3	UUU	160	4.44	19.45

Note: * indicates equipment with fabric filters or equivalent control devices

Combustion Emission Limits

EU	Equipment Name	Heat Input (MMBTUH)	NO _x		CO		SO ₂		VOC	
			lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EU19	Kettle Calciner #1	21	2.10	9.20	1.76	7.73	0.01	0.06	0.12	0.51
EU20	Kettle Calciner #2	21	2.10	9.20	1.76	7.73	0.01	0.06	0.12	0.51
EU21	Kettle Calciner #3	21	2.10	9.20	1.76	7.73	0.01	0.06	0.12	0.51
EU22	Kettle Calciner #4	21	2.10	9.20	1.76	7.73	0.01	0.06	0.12	0.51
EU23	Kettle Calciner #5	21	2.10	9.20	1.76	7.73	0.01	0.06	0.12	0.51
EU24	Kettle Calciner #6	21	2.10	9.20	1.76	7.73	0.01	0.06	0.12	0.51
EU25	Kettle Calciner #7	30	3.00	13.14	2.52	11.04	0.02	0.08	0.17	0.72
EU28	Wallboard Dryer #3	160	16.00	70.08	13.44	58.87	0.10	0.44	0.88	3.85

- A. All air discharges from the above units with * shall be processed by fabric filters (baghouses) or equivalent PM emissions control devices. [OAC 252:100-19 & 25]
- B. The permittee shall comply with NSPS, 40 CFR Part 60, Subpart UUU, Standards of Performance for Calciners and Dryers in Mineral Industries, for the affected facilities in this group including but not limited to: [40 CFR Part 60, Subpart UUU]
- 1) § 60.730 Applicability and designation of affected facility.
 - 2) § 60.731 Definitions.
 - 3) § 60.732 Standards for particulate matter.
 - a) Each owner or operator of any affected facility that is subject to the requirements of this subpart shall comply with the emission limitations set forth in this section on and after the date on which the initial performance test required by §60.8 is completed, but not later than 180 days after the initial startup, whichever date comes first. No emissions shall be discharged into the atmosphere from any affected facility that:
 - i. Contains particulate matter in excess of 0.092 g/DSCM (0.040 gr/DSCF) for calciners and for calciners and dryers installed in series and in excess of 0.057 g/DSCM (0.025 gr/DSCF) for dryers; and [§ 60.732(a)]
 - ii. Exhibits greater than 10% opacity, unless the emissions are discharged from an affected facility using a wet scrubbing control device. [§ 60.732(b)]

- 4) § 60.733 Reconstruction.
 - 5) § 60.734 Monitoring of emissions and operations.
 - 6) § 60.735 Recordkeeping and reporting requirements.
 - 7) § 60.736 Test methods and procedures.
 - 8) § 60.737 Delegation of authority.
- C. Compliance with the specified emission limitations shall be based on the use of AP-42 emission factors and the heat inputs referenced in the previous table, along with the records of proper fabric filter maintenance for all units in the table on the previous page.
[OAC 252:100-25]
2. The fuel-burning equipment shall be fired with pipeline quality natural gas having 0.5 grains or less TRS/100scf. Compliance can be shown for gaseous fuel by a current gas company bill, lab analysis, stain-tube analysis, gas contract, tariff sheet, or other approved methods. Compliance shall be demonstrated at least once per calendar year. [OAC 252:100-31]
 3. Usage of natural gas shall be limited to 4,441 MMscf per year and 370 MMscf per 30-day period. [OAC 252:100-8-6(a)(1)]
 4. Wallboard Dryer #3 shall be operated with flue gas recirculation to control emissions of NOx to less than 0.2 lb/MMBTU heat input. [OAC 252:100-33]
 5. Facility-wide HAP emissions shall be limited to less than 10 TPY for each pollutant and 25 TPY for combined pollutants. Compliance can be demonstrated by compliance with Specific Condition No. 3. [OAC 252:100-8-6(a)(1)]
 6. The permittee shall maintain records of operations as listed below. These records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-8-6(a)(3)]
 - A. Inspection and maintenance of baghouses (weekly).
 - B. Natural gas usage (monthly and 12-month rolling total).
 - C. Applicable NSPS records (Subparts OOO and UU).
 - D. Pressure differentials on each baghouse or VE observations for all grandfathered or non-grandfathered emission units per Specific Condition No. 1.
 - E. For fuel(s) burned, the appropriate document(s) as described in Specific Condition No. 2.
 - F. Records required for CAM per Specific Condition No. 11.
 - G. Compliance with emission limits (monthly and 12-month rolling total).
 7. The following records shall be maintained on-site to verify insignificant activities. No records are required for trivial activities. [OAC 252:100-43]
 - A. Throughput of fuel dispensing to vehicles (monthly, 12-month rolling total).
 - B. For activities that have the potential to emit less than 5 TPY (actual) of any criteria pollutant; the type of activity and the amount of emissions from that activity (cumulative annual).

8. No later than 30 days after each anniversary date of the issuance of the original Title V operating permit (11/4/2002), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. [OAC 252:100-8-6(c)(5)(A) & (D)]
9. Reasonable precautions shall be taken to minimize fugitive dust emissions from loading and unloading operations. These precautions shall include, but not be limited to:
[OAC 252:100-29]
 - A. The application of water or suitable chemicals or some other covering on materials stockpiles and other surfaces that can create air-borne dusts under normal conditions;
 - B. The installation and use of hoods, fans and dust collectors to enclose and vent the handling of dusty materials or the use of water sprays or other acceptable measures to suppress dust emission during handling;
 - C. The covering or wetting of open-bodied trucks, trailers, or railroad cars when transporting dusty materials in areas where the general public must have access;
 - D. The removal as necessary from paved street and parking surfaces of materials that have a tendency to become airborne;
 - E. The planting and maintenance of vegetative ground cover as necessary; and
 - F. Curtail operations to the extent necessary to comply with the emissions limitations.
10. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility. [OAC 252:100-8-6(d)(2)]
 - A. OAC 252:100-11 Alternative Emissions Reduction
 - B. OAC 252:100-23 Cotton Gins
 - C. OAC 252:100-24 Grain Elevators
 - D. OAC 252:100-39 Nonattainment Areas
 - E. OAC 252:100-47 Landfills
11. The permittee shall comply with 40 CFR Part 64 Compliance Assurance Monitoring for all affected facilities including but not limited to:
 - A. § 64.1 Definitions.
 - B. § 64.2 Applicability.
 - C. § 64.3 Monitoring design criteria.
 - D. § 64.6 Approval of monitoring.
 - E. § 64.7 Operation of approved monitoring.
 - F. § 64.8 Quality improvement plan (QIP) requirements.
 - G. § 64.9 Reporting and recordkeeping requirements.

H. Stacks affected by CAM:

EU	Point	Description	Control Device
EU5	BH1	Rock Conveyor Belts (12) *	Baghouse
EU6	BH2		Baghouse
EU9	R1	Rock Storage Bins *	Baghouse
EU11	BH6	Raymond Roller Mill #1 *	Baghouse
EU12	BH7	Raymond Roller Mill #2 *	Baghouse
EU13	BH8	Raymond Roller Mill #3 *	Baghouse
EU14	BH9	Raymond Roller Mill #4 *	Baghouse
EU15	BH10	Raymond Roller Mill #5 *	Baghouse
EU16	BH11	Raymond Roller Mill #6 *	Baghouse
EU17	BH12	Raymond Roller Mill #7 *	Baghouse
EU18	BH13	Raymond Roller Mill #8 *	Baghouse
EU62	BH22	Stucco Cooler*	Baghouse

* - Equipment is equipped with fabric filters.

I. The above identified baghouses are subject to Compliance Assurance Monitoring (CAM) and shall perform monitoring as approved below.

	Baghouses
Indicator	Baghouse pressure differential
Measurement Approach	Differential pressure transducer or manometer
Indicator Range	An excursion is defined as a daily pressure differential below 1 inch WC. Excursions trigger an inspection, corrective actions, and a reporting requirement.
Data Representativeness Performance Criteria	The differential pressure transducer monitors the static pressures upstream and downstream of the baghouse.
QA/QC Practices and Criteria	Annual comparison to U-tube manometer. Acceptability criterion is 0.5 inches WC.
Monitoring Frequency	Pressure differential is monitored at least once every day when operated.
Data Collection Procedure	Data are recorded electronically or in manual log sheets.
Averaging Period	None

12. This permit supersedes all previous Air Quality operating permits for this facility, which are now canceled.

**MAJOR SOURCE AIR QUALITY PERMIT
STANDARD CONDITIONS
(June 21, 2016)**

SECTION I. DUTY TO COMPLY

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.

[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements. [OAC 252:100-8-6(a)(3)(C)(iv)]

C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

- (1) the date, place and time of sampling or measurement;
- (2) the date or dates analyses were performed;
- (3) the company or entity which performed the analyses;
- (4) the analytical techniques or methods used;
- (5) the results of such analyses; and
- (6) the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report.

[OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions.

[OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act.

[OAC 252:100-43]

F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards (“NSPS”) under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants (“NESHAPs”) under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer’s instructions and in accordance with a protocol meeting the requirements of the “AQD Portable Analyzer Guidance” document or an equivalent method approved by Air Quality.

[OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM₁₀). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

SECTION IV. COMPLIANCE CERTIFICATIONS

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source.

[OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification.

[OAC 252:100-8-6(c)(6)]

SECTION VI. PERMIT SHIELD

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit.

[OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit.

[OAC 252:100-8-6(d)(2)]

SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.

[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

SECTION VIII. TERM OF PERMIT

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

SECTION IX. SEVERABILITY

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [OAC 252:100-8-6 (a)(6)]

SECTION X. PROPERTY RIGHTS

A. This permit does not convey any property rights of any sort, or any exclusive privilege. [OAC 252:100-8-6(a)(7)(D)]

B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued. [OAC 252:100-8-6(c)(6)]

SECTION XI. DUTY TO PROVIDE INFORMATION

A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing,

terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.

[OAC 252:100-8-6(a)(7)(E)]

B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.

[OAC 252:100-8-6(a)(7)(E)]

C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.

[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

SECTION XII. REOPENING, MODIFICATION & REVOCATION

A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.

[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]

B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances:

[OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]

- (1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
- (2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.
- (3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
- (4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d).

[OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a "grandfathered source," as defined under AQD rules. Such changes may require a permit modification.

[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

SECTION XIII. INSPECTION & ENTRY

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(17) for confidential information submitted to or obtained by the DEQ under this section):

- (1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6(c)(2)]

SECTION XIV. EMERGENCIES

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: [OAC 252:100-8-6 (e)(2)]

- (1) an emergency occurred and the permittee can identify the cause or causes of the emergency;

- (2) the permitted facility was at the time being properly operated;
- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F. [OAC 252:100-8-6(a)(3)(C)(iv)]

SECTION XV. RISK MANAGEMENT PLAN

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

SECTION XVI. INSIGNIFICANT ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

- (1) 5 tons per year of any one criteria pollutant.
- (2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.

[OAC 252:100-8-2 and OAC 252:100, Appendix I]

SECTION XVII. TRIVIAL ACTIVITIES

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.

[OAC 252:100-8-2 and OAC 252:100, Appendix J]

SECTION XVIII. OPERATIONAL FLEXIBILITY

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

- (1) result in no net emissions increases,
- (2) are not modifications under any provision of Title I of the federal Clean Air Act, and
- (3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

- (1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter. [OAC 252:100-13]
- (2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU. [OAC 252:100-19]
- (3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for: [OAC 252:100-25]
 - (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
 - (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
 - (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
 - (d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.
- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of

adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. [OAC 252:100-29]

- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide. [OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system. [OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs. [OAC 252:100-37-36]

SECTION XX. STRATOSPHERIC OZONE PROTECTION

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

- (1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
- (2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
- (3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
- (3) Persons performing maintenance, service, repair, or disposal of appliances must be

- certified by an approved technician certification program pursuant to § 82.161;
- (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
 - (5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
 - (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

SECTION XXI. TITLE V APPROVAL LANGUAGE

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

- (1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
- (2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
- (3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
- (4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R. § 70.8(a) and (c).
- (5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
- (6) The DEQ complies with 40 C.F.R. § 70.8(d).
- (7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
- (8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
- (9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).

- (10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

SECTION XXII. CREDIBLE EVIDENCE

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[OAC 252:100-43-6]



PART 70 PERMIT

AIR QUALITY DIVISION
STATE OF OKLAHOMA
DEPARTMENT OF ENVIRONMENTAL QUALITY
707 NORTH ROBINSON, SUITE 4100
P. O. BOX 1677
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit No. 2024-0107-TVR4

American Gypsum Company,

having complied with the requirements of the law, is hereby granted permission to operate the Gypsum Wallboard Plant located in Section 11, Township 2N, Range 23W, Duke, Jackson County, OK, subject to Major Source Standard Conditions dated June 21, 2016, and Specific Conditions, both attached.

This permit shall expire five (5) years from the issuance date below, except as authorized under Section B of the Standard Conditions.

DRAFT/PROPOSED

Director, Air Quality Division

Date

American Gypsum Company, LLC
Attn: Mr. Larry Brock
18972 U.S. 62 West
Duke, OK 73532

SUBJECT: Permit Application No. 2024-0107-TVR4 (Fac. ID: 1428)
Gypsum Wallboard Plant
Section 11, Township 2N, Range 23W
Duke, Jackson County, Oklahoma

Dear Mr. Brock:

Enclosed is the permit authorizing operation of the referenced facility. Please note that this permit is issued subject to standard and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emission inventory for this facility. An emission inventory must be completed through DEQ's electronic reporting system by April 1st of every year. Any questions concerning the form or submittal process should be referred to the Emission Inventory Staff at (405) 702-4100.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me at Ryan.Buntyn@deq.ok.gov or (405) 702-4213.

Sincerely,

Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

Enclosure

American Gypsum Company, LLC
Attn: Mr. Larry Brock
18972 U.S. 62 West
Duke, OK 73532

SUBJECT: Permit Application No. 2024-0107-TVR4 (Fac. ID: 1428)
Gypsum Wallboard Plant
Section 11, Township 2N, Range 23W
Duke, Jackson County, Oklahoma

Dear Mr. Brock:

Air Quality has received the permit application for the referenced facility and completed initial review. This application has been determined to be a **Tier II** application. In accordance with 27A O.S. 2-14-301 and 302 and OAC 252:4-7-13(c), the enclosed draft permit is now ready for public review. The requirements for public review of the draft permit include the following steps, which you must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located (Instructions enclosed);
2. Submit sample notice and provide date of publication to **AQD 5 days prior to notice publishing**;
3. Provide for public review, for a period of 30 days following the date of the newspaper announcement, a copy of the application and draft permit at a convenient location (preferentially at a public location) within the county of the facility;
4. Send AQD a signed affidavit of publication for the notice(s) from Item #1 above within 20 days of publication of the draft permit. Any additional comments or requested changes you have for the draft permit or the application should be submitted within 30 days of publication.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (918) 293-1615.

Sincerely,



Phillip Fielder, P.E., Chief Engineer
AIR QUALITY DIVISION

Texas Commission on Environmental Quality
Air Permit Division
P.O. Box 1387
Austin, TX 78711-3087

Re: Permit Application No. 2024-0107-TVR4 (Fac. ID: 1428)
Gypsum Wallboard Plant
Section 11, Township 2N, Range 23W
Duke, Jackson County, Oklahoma
Permit Writer: Ryan Buntyn

Dear Sir/Madam:

The subject referenced facility has requested the renewal of a Part 70 operating permit. Air Quality Division has completed the initial review of the application and prepared a draft permit for public review. Since this facility is within 50 miles of the Oklahoma – Texas border, a copy of the proposed permit will be provided to you upon request. Information on all permits and a copy of this draft permit are available for review by public in the Air Quality Section of the DEQ Web Page: <https://www.deq.ok.gov>.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4213.

Sincerely,



Phillip Fielder, P.E.
Chief Engineer
AIR QUALITY DIVISION

NOTICE OF DRAFT PERMIT TIER II or TIER III AIR QUALITY PERMIT APPLICATION

APPLICANT RESPONSIBILITIES

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Note that if either the applicant or the public requests a public meeting, this must be arranged by the DEQ.

1. Complete the public notice using the samples provided by AQD below. Please use the version applicable to the requested permit action;
Version 1 – Traditional NSR process for a construction permit
Version 2 – Enhanced NSR process for a construction permit
Version 3 – initial Title V (Part 70 Source) operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating a construction permit that followed Traditional NSR process
2. Determine appropriate newspaper local to facility for publishing;
3. Submit sample notice and provide date of publication to AQD 5 days prior to notice publishing;
4. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD.

REQUIRED CONTENT (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

SAMPLE NOTICE: **On the following page**

Version 3 – For initial Title V operating permit, Title V operating permit renewal, Significant Modification to a Title V operating permit, and any Title V operating permit modification incorporating requirements of a construction permit that followed Traditional NSR process

DEQ NOTICE OF TIER ...II or III... DRAFT PERMIT

A Tier ...II or III... application for an air quality ...type of permit or permit action being sought (e.g., significant modification to a Title V permit or Title V/Title V renewal permit)... has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant, ...name and address.

The applicant requests approval to ...brief description of purpose of application... at the ...site/facility name ... [proposed to be] located at ...physical address (if any), driving directions, and legal description including county....

In response to the application, DEQ has prepared a draft operating permit [modification] (Permit Number: ...xxxx-xxxx-x...), which may be reviewed at ...locations (one must be in the county where the site/facility is located)... or at the Air Quality Division's main office (see address below). The draft permit is also available for review under Permits for Public Review on the DEQ Web Page: <http://www.deq.ok.gov/>

This draft permit would authorize the facility to emit the following regulated pollutants: (list each pollutant and amounts in tons per year (TPY)) [For facility modifications only, either add: , which represents (identify the emissions change involved in the modification), or add: . The modification will not result in a change in emissions]

The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below or as directed through the corresponding online notice. [Modifications only, add: Only those issues relevant to the proposed modification(s) are open for comment.] A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ staff.

In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8.

If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45-day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j).

Information on all permit actions including draft permits, proposed permits, final issued permits and applicable review timelines are available in the Air Quality section of the DEQ Web page: <http://www.deq.ok.gov/>.

For additional information, contact ...names, addresses and telephone numbers of contact persons for the applicant, or contact DEQ at: Chief Engineer, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.

Department of Environmental Quality (DEQ)
Air Quality Division (AQD)
Acronym List
9-10-21

ACFM	Actual Cubic Feet per Minute	GACT	Generally Achievable Control Technology
AD	Applicability Determination	GAL	Gallon (gal)
AFRC	Air-to-Fuel Ratio Controller	GDF	Gasoline Dispensing Facility
API	American Petroleum Institute	GEP	Good Engineering Practice
ASTM	American Society for Testing and Materials	GHG	Greenhouse Gases
		GR	Grain(s) (gr)
BACT	Best Available Control Technology	H₂CO	Formaldehyde
BAE	Baseline Actual Emissions	H₂S	Hydrogen Sulfide
BBL	Barrel(s)	HAP	Hazardous Air Pollutants
BHP	Brake Horsepower (bhp)	HC	Hydrocarbon
BTU	British thermal unit (Btu)	HCFC	Hydrochlorofluorocarbon
		HFR	Horizontal Fixed Roof
C&E	Compliance and Enforcement	HON	Hazardous Organic NESHAP
CAA	Clean Air Act	HP	Horsepower (hp)
CAM	Compliance Assurance Monitoring	HR	Hour (hr)
CAS	Chemical Abstract Service		
CAAA	Clean Air Act Amendments	I&M	Inspection and Maintenance
CC	Catalytic Converter	IBR	Incorporation by Reference
CCR	Continuous Catalyst Regeneration	ICE	Internal Combustion Engine
CD	Consent Decree		
CEM	Continuous Emission Monitor	LAER	Lowest Achievable Emission Rate
CFC	Chlorofluorocarbon	LB	Pound(s) [Mass] (lb, lbs, lbm)
CFR	Code of Federal Regulations	LB/HR	Pound(s) per Hour (lb/hr)
CI	Compression Ignition	LDAR	Leak Detection and Repair
CNG	Compressed Natural Gas	LNG	Liquefied Natural Gas
CO	Carbon Monoxide or Consent Order	LT	Long Ton(s) (metric)
COA	Capable of Accommodating		
COM	Continuous Opacity Monitor	M	Thousand (Roman Numeral)
		MAAC	Maximum Acceptable Ambient Concentration
D	Day	MACT	Maximum Achievable Control Technology
DEF	Diesel Exhaust Fluid	MM	Prefix used for Million (Thousand-Thousand)
DG	Demand Growth	MMBTU	Million British Thermal Units (MMBtu)
DSCF	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	MMBTUH	Million British Thermal Units per Hour (MMBtu/hr)
		MMSCF	Million Standard Cubic Feet (MMscf)
EGU	Electric Generating Unit	MMSCFD	Million Standard Cubic Feet per Day
EI	Emissions Inventory	MSDS	Material Safety Data Sheet
EPA	Environmental Protection Agency	MWC	Municipal Waste Combustor
ESP	Electrostatic Precipitator	MWe	Megawatt Electrical
EUG	Emissions Unit Group		
EUSGU	Electric Utility Steam Generating Unit	NA	Nonattainment
		NAAQS	National Ambient Air Quality Standards
FCE	Full Compliance Evaluation	NAICS	North American Industry Classification System
FCCU	Fluid Catalytic Cracking Unit	NESHAP	National Emission Standards for Hazardous Air Pollutants
FESOP	Federally Enforceable State Operating Permit		
FIP	Federal Implementation Plan		
FR	Federal Register		

NH₃	Ammonia	RFG	Refinery Fuel Gas
NMHC	Non-methane Hydrocarbon	RICE	Reciprocating Internal Combustion Engine
NGL	Natural Gas Liquids	RO	Responsible Official
NO₂	Nitrogen Dioxide	ROAT	Regional Office at Tulsa
NO_x	Nitrogen Oxides	RVP	Reid Vapor Pressure
NOI	Notice of Intent		
NSCR	Non-Selective Catalytic Reduction	SCC	Source Classification Code
NSPS	New Source Performance Standards	SCF	Standard Cubic Foot
NSR	New Source Review	SCFD	Standard Cubic Feet per Day
		SCFM	Standard Cubic Feet per Minute
O₃	Ozone	SCR	Selective Catalytic Reduction
O&G	Oil and Gas	SER	Significant Emission Rate
O&M	Operation and Maintenance	SI	Spark Ignition
O&NG	Oil and Natural Gas	SIC	Standard Industrial Classification
OAC	Oklahoma Administrative Code	SIP	State Implementation Plan
OC	Oxidation Catalyst	SNCR	Selective Non-Catalytic Reduction
		SO₂	Sulfur Dioxide
PAH	Polycyclic Aromatic Hydrocarbons	SO_x	Sulfur Oxides
PAE	Projected Actual Emissions	SOP	Standard Operating Procedure
PAL	Plant-wide Applicability Limit	SRU	Sulfur Recovery Unit
Pb	Lead		
PBR	Permit by Rule	T	Tons
PCB	Polychlorinated Biphenyls	TAC	Toxic Air Contaminant
PCE	Partial Compliance Evaluation	TEG	Triethylene Glycol
PEA	Portable Emissions Analyzer	THC	Total Hydrocarbons
PFAS	Per- and Polyfluoroalkyl Substance	TPY	Tons per Year
PM	Particulate Matter	TRS	Total Reduced Sulfur
PM_{2.5}	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers	TSP	Total Suspended Particulates
PM₁₀	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers	TV	Title V of the Federal Clean Air Act
POM	Particulate Organic Matter or Polycyclic Organic Matter	µg/m³	Micrograms per Cubic Meter
ppb	Parts per Billion	US EPA	U. S. Environmental Protection Agency
ppm	Parts per Million		
ppmv	Parts per Million Volume	VFR	Vertical Fixed Roof
ppmvd	Parts per Million Dry Volume	VMT	Vehicle Miles Traveled
PSD	Prevention of Significant Deterioration	VOC	Volatile Organic Compound
psi	Pounds per Square Inch	VOL	Volatile Organic Liquid
psia	Pounds per Square Inch Absolute	VRT	Vapor Recovery Tower
psig	Pounds per Square Inch Gage	VRU	Vapor Recovery Unit
RACT	Reasonably Available Control Technology	YR	Year
RATA	Relative Accuracy Test Audit	2SLB	2-Stroke Lean Burn
RAP	Regulated Air Pollutant or Reclaimed Asphalt Pavement	4SLB	4-Stroke Lean Burn
		4SRB	4-Stroke Rich Burn