

OPERATING AIR PERMIT

Pursuant to the Regulations of the Arkansas Operating Air Permit Program, Regulation #26:

Permit #: 75-AOP-R1

IS ISSUED TO:

Ash Grove Cement Company
4457 Highway 108
Foreman, AR 71836
Little River County
AFIN: 41-00001

THIS PERMIT AUTHORIZES THE ABOVE REFERENCED PERMITTEE TO INSTALL, OPERATE, AND MAINTAIN THE EQUIPMENT AND EMISSION UNITS DESCRIBED IN THE PERMIT APPLICATION AND ON THE FOLLOWING PAGES. THIS PERMIT IS VALID BETWEEN:

October 2, 2002

and

October 1, 2007

AND IS SUBJECT TO ALL LIMITS AND CONDITIONS CONTAINED HEREIN.

Signed:

Keith A. Michaels

Date Modified

SECTION I: FACILITY INFORMATION

| | |
|----------------------|---------------------------------------|
| PERMITTEE: | Ash Grove Cement Company |
| AFIN: | 41-00001 |
| PERMIT NUMBER: | 75-AOP-R1 |
| FACILITY ADDRESS: | 4457 Highway 108 Foreman, AR 71836 |
| COUNTY: | Little River |
| CONTACT NAME: | Terry R. Kerby |
| TELEPHONE NUMBER: | (501) 542-6217 |
| REVIEWING ENGINEER: | Wesley Crouch |
| UTM North-South (X): | 3728.9 |
| UTM East-West (Y): | 368.35 |

SECTION II: INTRODUCTION
Summary of Permit Activity

This modification will allow Ash Grove to construct a new cement kiln dust (CKD) handling system(SN-P32,SN- P33, SN-P34, SN-P35 and SN-P36) and remove baghouses P18 and P19. This system will allow the CKD to be pneumatically conveyed across the highway to a new CKD landfill and it will also allow some of the CKD to be recycled to kiln #3. This modification will result in net PM/PM₁₀ emissions increases of 0.8 lb/hr and 2.6 tpy from the CKD handling equipment and 4 proposed new fabric filter dust collectors. Also, Ash Grove proposes to construct a baghouse (SN-C44). This change will result in an increase of PM/PM₁₀ emissions of 0.17 lb/hr and 0.75 tpy. Finally, Ash Grove Cement Company will add 3 drag conveyors and replace 2 bucket conveyors and a belt conveyor that are part of the clinker handling system. The two bucket conveyors are the number 6 and number 7 bucket conveyors. The belt conveyor is the 440 belt. These conveyors are subject to all applicable sections of 40 CFR 63, Subpart LLL. No additional emissions are expected to result from this modification.

Process Description

For informational purposes only, this section does not contain enforceable conditions

Ash Grove Cement Company operates a portland cement plant near Foreman, Arkansas. The manufacture of portland cement at this facility is a five step process.

1. Acquisition of raw materials from nearby quarrying and crushing and from off-site sources.
2. Preparation of the raw materials for pyroprocessing by grinding with water into a slurry.
3. Pyroprocessing of the slurried raw materials into portland cement clinker.
4. Grinding of a mixture of clinker and gypsum into various portland cement products.
5. Cement storage and shipment of finished cement.

Raw materials consist of chalk, sand, and iron ore. Chalk is received by belt conveyor from the plant quarry and stock-piled in an A-framed structure. Sand and iron ore are received from off site and stored in separate outdoor piles. The chalk, sand, and iron ore are crushed and then transported to the mill building by a conveyor belt.

Within the mill building, the chalk, sand, and iron ore are stored in separate bins. These raw materials are proportioned, mixed with water in a ball mill and ground into a slurry. The slurry

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is pumped and metered into three rotary cement kilns in which chemical reactions occur to form clinker, an intermediate product that ultimately becomes portland cement.

From time-to-time, spent kiln brick removed from the rotary kilns is used to replace a portion of the raw materials fed to kiln #3. The spent brick is crushed in a portable crusher before being transferred to the mill building with other raw materials.

The raw material slurry is fed to the rotary kiln pyroprocessing system. The kilns are slowly-rotating steel tubes lined with various refractory materials (e.g. kiln brick). Each kiln slopes at an angle of about 5 degrees. The raw material slurry is fed to the kiln at the upper, or feed, end. Fuel generally is introduced at the lower, or burning, end of the kiln. The slope and rotation of the kiln allows the slurry to flow by gravity through the various reaction zones within the kiln. Combustion gases and the slurry flow countercurrent to each other. Each kiln is equipped with an electrostatic precipitator to control particulate emissions.

Within the rotary kilns, the chemical constituents of the raw materials react with each other and are fused into nodules of portland cement clinker at a material temperature of about 2700 EF. The clinker exits at the burning end of the kiln and falls into clinker coolers in which the clinker is air cooled. A portion of this air is used for combustion air in the kilns. The balance of the air is vented to the atmosphere through a fabric filter.

After cooling, the clinker is transported by a series of conveyors to clinker storage silos. The clinker can also be transported by conveyor to an enclosed storage dome or by truck to an outside storage pile.

Clinker taken from storage is sent to finish milling. During finish milling, clinker is ground with gypsum and/or other additives to produce portland cement and masonry cement. Gypsum is delivered to the plant from off site sources and stored in an outdoor pile adjacent to the raw material storage areas. Gypsum is withdrawn from the pile by an underpile feeder which is located in a tunnel. The gypsum is transported to mill feed bins in the mill building. Chalk for masonry cement is dried in a rotary drier equipped with a wet scrubber control device.

Cement is pneumatically conveyed from the finish mills to several storage silos. From these silos, the cement is loaded into rail cars and trucks or packed into bags for shipment.

The fuel sources used to produce clinker at the Foreman plant include fossil fuels, including coal and natural gas, tire-derived fuel (TDF), hazardous waste-derived fuel (HWDF), and used oils from on and off site sources. These fuels are used in varying combinations and in varying percentages of the total fuel input.

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Fuels are fed to the clinker discharge end of the kiln through a multichannel burner pipe. Containerized solid hazardous waste-derived fuel (SWDF) and TDF are fed directly into the calcining zone within the kilns. This location generally is midway between the feed end and burning end of the kiln.

The primary fossil fuel used to fire the kilns is coal. Coal is received from off-site sources and is stored in an outdoor storage pile.

TDF is received at the plant from off site sources. Tires may be fed to the kilns by hand or using automated equipment.

LWDF is received in rail tank cars and in tank trucks and stored in above ground storage tanks before being transferred to the kilns. Currently, Ash Grove operates three above ground LWDF storage tanks. In the near future, Ash Grove will operate seven above ground LWDF storage tanks. To control VOC emissions, the LWDF storage tanks are vented to a thermal oxidizer with a back up carbon adsorption system.

Containerized SWDF is received in van trailers and flat bed trailer trucks. Each individual container of SWDF is mechanically fed at the mid-kiln location.

Regulations

This facility is subject to regulation under the Arkansas Air Pollution Control Code (Regulation 18), the Arkansas State Implementation Plan for Air Pollution Control (Regulation 19), the Arkansas Operating Air Permit Program (Regulation 26), 40 CFR Part 60 Subpart F, *Standards of Performance for Portland Cement Plants*, 40 CFR Part 60 Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels(Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification commenced After July 23, 1984*, 40 CFR Part 61, Subpart FF, *National Emission Standards for Benzene Waste Operations*, 40 CFR Part 63, Subpart DD, *National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations*, 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, and 40 CFR Part 63, Subpart EEE, *National Emission Standards for Hazardous Air Pollutants From Hazardous Waste Combustors*.

The following table is a summary of emissions from the facility. Specific conditions and emissions for each source can be found starting on the page cross referenced in the table.

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|------------------|
| EMISSION SUMMARY |
|------------------|

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| Source No. | Description | Pollutant | Emission Rates | | Cross Reference Page |
|------------|-------------|-----------|----------------|-----|----------------------|
| | | | lb/hr | tpy | |

| | | | | |
|---------------------------|---------------------------|---------|----------|--|
| Total Allowable Emissions | PM | 415.97 | 1103.55 | |
| | PM ₁₀ | 135.17 | 552.55 | |
| | SO ₂ | 2563.4 | 5736.1 | |
| | VOC | 81.4 | 285.1 | |
| | CO | 551.4 | 1214.9 | |
| | NO _x | 3337.1 | 9097.0 | |
| | 1,1,1-trichloroethane | 0.03 | 0.05 | |
| | 1,1,2,2-tetrachloroethane | 0.03 | 0.1 | |
| | 1,1,2-trichloroethane | 0.03 | 0.11 | |
| | 1,1-dichloroethane | 0.03 | 0.05 | |
| | 1,1-dichloroethene | 0.33 | 1.4 | |
| | 1,2,4-trichlorobenzene | 0.17 | 0.72 | |
| | 1,2-dichloroethane | 1.69 | 7.42 | |
| | 1,2-dichloropropene | 0.03 | 0.1 | |
| | 1,2-epoxybutane | 0.09 | 0.32 | |
| | 1,3-butadiene | 0.53 | 2.27 | |
| | 1,4-dichlorobenzene | 0.39 | 1.63 | |
| | 1,4-phenylene-diamine | 0.08 | 0.32 | |
| | 2,4,5-trichlorophenol | 0.03 | 0.08 | |
| | 2,4,6-trichlorophenol | 0.19 | 0.86 | |
| | 2,4-dinitrophenol | 0.07 | 0.25 | |
| | 2,4-dinitrotoluene | 0.014 | 0.03 | |
| | 2-butanone | 0.62 | 2.69 | |
| | 3,3-dichlorobenzidine | 0.03 | 0.09 | |
| | 3,3-dimethoxybenzidine | 0.03 | 0.1 | |
| | 4-methyl-2-pentanone | 0.03 | 0.21 | |
| | 4-nitrophenol | 0.05 | 0.17 | |
| | acrylonitrile | 0.07 | 0.24 | |
| | allyl chloride | 0.53 | 2.34 | |
| | aniline | 0.02 | 0.06 | |
| | antimony | 30.5 | 57.37 | |
| | arsenic | 0.00566 | 0.02459 | |
| | benzene | 0.47 | 2.01 | |
| | benzidine | 0.018 | 0.05 | |
| | beryllium | 0.00063 | 0.002734 | |
| | bis(2-chloroethyl)ether | 0.03 | 0.08 | |
| | bis(2-ethylhexyl)phthlate | 0.748 | 3.28 | |
| | bromodichloromethane | 0.04 | 0.13 | |
| | bromoform | 0.03 | 0.12 | |
| | bromomethane | 0.78 | 3.43 | |

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|--|----------------------------|------------|------------|--|
| | cadmium | 0.06513 | 0.2843 | |
| | carbon disulfide | 0.17 | 0.75 | |
| | carbon tetrachloride | 0.03 | 0.06 | |
| | chlorinechlorobenzene | 1.34320.35 | 5.86561.52 | |
| | chloroethane | 2.11 | 9.19 | |
| | chloroform | 0.24 | 1.07 | |
| | chloromethane | 2.19 | 9.55 | |
| | chromium | 0.01559 | 0.0683 | |
| | cis-1,3-dichloropropene | 0.03 | 0.18 | |
| | cobalt† | 66.0 | 289.12 | |
| | cumene | 0.03 | 0.1 | |
| | diethanolamine | 1.1 | 4.6 | |
| | dimethylphthalate | 0.014 | 0.03 | |
| | ethyl acrylate | 0.35 | 1.5 | |
| | ethylbenzene | 0.21 | 0.87 | |
| | ethylene dibromide | 0.03 | 0.04 | |
| | ethylene glycol | 0.35 | 1.6 | |
| | hexachlorobenzene | 0.03 | 0.05 | |
| | hexachlorobutadiene | 0.03 | 0.09 | |
| | hexachlorocyclopentadiene | 0.03 | 0.08 | |
| | hexachloroethane | 0.03 | 0.1 | |
| | hydrogen chloride | 34.54 | 151.3 | |
| | hydroquinone | 0.04 | 0.17 | |
| | iodomethane | 0.07 | 0.29 | |
| | lead | 1.42 | .9640 | |
| | manganese | 0.1462 | 0.64 | |
| | mercury | 0.2147 | 0.94 | |
| | methyl methacrylate | 0.03 | 0.15 | |
| | methylene chloride | 4.72 | 20.63 | |
| | naphthalene | 0.96 | 4.26 | |
| | n-hexane | 0.19 | 0.87 | |
| | nickel_ | 66.0 | 289.12 | |
| | nitrobenzene | 0.03 | 0.11 | |
| | N-nitrosodiphenylamine | 0.016 | 0.03 | |
| | N-nitrosomorpholine | 0.03 | 0.13 | |
| | ortho-anisidine | 0.03 | 0.11 | |
| | ortho-toluidine | 0.018 | 0.05 | |
| | o-xylene | 0.36 | 1.56 | |
| | pentachlorophenol | 0.05 | 0.15 | |
| | phenol | 0.19 | 0.82 | |
| | selenium | 0.0255 | 0.1118 | |
| | styrene | 0.07 | 0.26 | |
| | tert-butyl methyl ether | 0.03 | 0.05 | |
| | tetrachloroethene | 0.03 | 0.16 | |
| | toluene | 0.03 | 0.42 | |
| | trans-1,3-dichloropropene | 0.03 | 0.12 | |
| | trichloroethene | 0.13 | 0.59 | |
| | vinyl acetatevinyl bromide | 0.030.13 | 0.060.61 | |
| | vinyl chloride | 0.89 | 3.83 | |
| | xylene | 1.45 | 3.83 | |

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| | | | | | |
|----|---------|----------------------------|------------|-----------|----|
| P1 | Kiln #1 | PM | 19.5 | 85.4 | 32 |
| | | PM ₁₀ | 19.5 | 85.4 | |
| | | SO ₂ | 849.0 | 1960.0 | |
| | | VOC | 9.6 | 42.1 | |
| | | CO | 172.0 | 368.0 | |
| | | NO _x | 889.0 | 2400.0 | |
| | | 1,1,1-trichloroethane | 0.01 | 0.02 | |
| | | 1,1,2,2-tetrachloroethane | 0.01 | 0.03 | |
| | | 1,1,2-trichloroethane | 0.01 | 0.04 | |
| | | 1,1-dichloroethane | 0.01 | 0.02 | |
| | | 1,1-dichloroethene | 0.16 | 0.69 | |
| | | 1,2,4-trichlorobenzene | 0.08 | 0.35 | |
| | | 1,2-dichloroethane | 0.01 | 0.05 | |
| | | 1,2-dichloropropane | 0.01 | 0.04 | |
| | | 1,2-epoxybutane | 0.01 | 0.01 | |
| | | 1,3-butadiene | 0.02 | 0.07 | |
| | | 1,4-dichlorobenzene | 0.19 | 0.81 | |
| | | 1,4-phenylene-diamine | 0.01 | 0.03 | |
| | | 2,4,5-trichlorophenol | 0.01 | 0.03 | |
| | | 2,4,6-trichlorophenol | 0.01 | 0.05 | |
| | | 2,4-dinitrophenol | 0.03 | 0.11 | |
| | | 2,4-dinitrotoluene | 0.002 | 0.01 | |
| | | 2-butanone | 0.21 | 0.91 | |
| | | 3,3-dichlorobenzidine | 0.01 | 0.04 | |
| | | 3,3-dimethoxybenzidine | 0.01 | 0.04 | |
| | | 4-methyl-2-pentanone | 0.01 | 0.09 | |
| | | 4-nitrophenol | 0.02 | 0.07 | |
| | | acrylonitrile | 0.03 | 0.11 | |
| | | allyl chloride | 0.19 | 0.84 | |
| | | aniline | 0.005 | 0.02 | |
| | | antimony | 8.8 | 38.5 | |
| | | arsenic | 0.00258 | 0.0112 | |
| | | benzene | 0.22 | 0.95 | |
| | | benzidine | 0.004 | 0.02 | |
| | | beryllium | 0.00028 | 0.00123 | |
| | | bis(2-chloroethyl)ether | 0.01 | 0.03 | |
| | | bis(2-ethylhexyl)phthalate | 0.004 | 0.02 | |
| | | bromodichloromethane | 0.01 | 0.02 | |
| | | bromoform | 0.01 | 0.03 | |
| | | bromomethanecadmium | 0.260.0307 | 1.150.134 | |
| | | carbon disulfide | 0.08 | 0.37 | |
| | | carbon tetrachloride | 0.01 | 0.02 | |
| | | chlorine | 0.0016 | 0.0078 | |
| | | chlorobenzene | 0.17 | 0.73 | |
| | | chloroethane | 1.05 | 4.59 | |
| | | chloroform | 0.01 | 0.06 | |
| | | chloromethane | 0.12 | 0.51 | |
| | | chromium | 0.00578 | 0.0253 | |

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| | | | | | |
|--|--|---------------------------|----------|----------|--|
| | | cis-1,3-dichloropropene | 0.02 | 0.08 | |
| | | cobalt ⁺ | 19.5 | 85.41 | |
| | | cumene | 0.01 | 0.03 | |
| | | dimethylphthalate | 0.002 | 0.01 | |
| | | ethyl acrylate | 0.11 | 0.46 | |
| | | ethyl benzene | 0.1 | 0.41 | |
| | | ethylene dibromide | 0.01 | 0.01 | |
| | | hexachlorobenzene | 0.01 | 0.02 | |
| | | hexachlorobutadiene | 0.01 | 0.03 | |
| | | hexachlorocyclopentadiene | 0.01 | 0.03 | |
| | | hexachloroethane | 0.01 | 0.04 | |
| | | hydrogen chloride | 9.52 | 41.7 | |
| | | hydroquinone | 0.01 | 0.05 | |
| | | iodomethane | 0.03 | 0.13 | |
| | | lead | .06 | .263 | |
| | | manganese | 0.043 | 0.188 | |
| | | mercury | 0.0694 | 0.304 | |
| | | methyl methacrylate | 0.01 | 0.05 | |
| | | methylene chloride | 2.24 | 9.8 | |
| | | naphthalene | 0.29 | 1.29 | |
| | | n-hexane | 0.06 | 0.27 | |
| | | nickel ⁺ | 19.5 | 85.41 | |
| | | nitrobenzene | 19.5 | 0.02 | |
| | | N-nitrosodiphenylamine | 0.003 | 0.01 | |
| | | n-nitrosomorpholine | 0.01 | 0.04 | |
| | | ortho-aniside | 0.01 | 0.04 | |
| | | ortho-toluidine | 0.004 | 0.02 | |
| | | o-xylene | 0.08 | 0.35 | |
| | | pentachlorophenol | 0.02 | 0.07 | |
| | | phenol | 0.05 | 0.22 | |
| | | selenium | 0.0075 | 0.0329 | |
| | | styrene | 0.03 | 0.12 | |
| | | tert-butyl methyl ether | 0.01 | 0.02 | |
| | | tetrachloroethene | 0.02 | 0.07 | |
| | | toluene | 0.04 | 0.19 | |
| | | trans-1,3-dichloropropene | 0.010.06 | 0.050.28 | |
| | | vinyl acetate | 0.01 | 0.02 | |
| | | vinyl bromide | 0.01 | 0.06 | |
| | | vinyl chloride | 0.44 | 1.91 | |
| | | m/p xylene | 0.21 | 0.92 | |

| | | | | | |
|----|---------|------------------|-------|--------|----|
| P2 | Kiln #2 | PM | 19.5 | 85.4 | 37 |
| | | PM ₁₀ | 19.5 | 85.4 | |
| | | SO ₂ | 753.0 | 1690.0 | |

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| | | | | | |
|--|--|-------------------------------|----------|----------|--|
| | | VOC | 9.6 | 42.1 | |
| | | CO | 152.0 | 333.0 | |
| | | NO _x | 882.0 | 2453.0 | |
| | | 1,1,1-trichloroethane | 0.01 | 0.02 | |
| | | 1,1,2,2-tetrachloroethane | 0.01 | 0.03 | |
| | | 1,1,2-trichloroethane | 0.01 | 0.04 | |
| | | 1,1-dichloroethane | 0.01 | 0.02 | |
| | | 1,1-dichloroethene | 0.16 | 0.69 | |
| | | 1,2,4-trichlorobenzene | 0.08 | 0.35 | |
| | | 1,2-dichloroethane | 0.01 | 0.05 | |
| | | 1,2-dichloropropane | 0.01 | 0.04 | |
| | | 1,2-epoxybutane | 0.01 | 0.01 | |
| | | 1,3-butadiene | 0.02 | 0.07 | |
| | | 1,4-dichlorobenzene | 0.19 | 0.81 | |
| | | 1,4-phenylene-diamine | 0.01 | 0.03 | |
| | | 2,4,5-trichlorophenol | 0.01 | 0.03 | |
| | | 2,4,6-trichlorophenol | 0.01 | 0.05 | |
| | | 2,4-dinitrophenol | 0.03 | 0.11 | |
| | | 2,4-dinitrotoluene | 0.002 | 0.01 | |
| | | 2-butanone | 0.21 | 0.91 | |
| | | 3,3-dichlorobenzidine | 0.01 | 0.04 | |
| | | 3,3-dimethoxybenzidine | 0.01 | 0.04 | |
| | | 4-methyl-2-pentanone | 0.01 | 0.09 | |
| | | 4-nitrophenol | 0.02 | 0.07 | |
| | | acrylonitrile | 0.03 | 0.11 | |
| | | allyl chloride | 0.19 | 0.84 | |
| | | aniline | 0.005 | 0.02 | |
| | | antimony | 8.8 | 38.5 | |
| | | arsenic | 0.00258 | 0.0112 | |
| | | benzene | 0.22 | 0.95 | |
| | | benzidine | 0.004 | 0.02 | |
| | | beryllium | 0.00028 | 0.00123 | |
| | | bis(2-chloroethyl)ether | 0.01 | 0.03 | |
| | | bis(2-ethylhexyl)phthalate | 0.004 | 0.02 | |
| | | bromodichloromethanebromoform | 0.010.01 | 0.020.03 | |
| | | bromomethane | 0.26 | 1.15 | |
| | | cadmium | 0.0307 | 0.134 | |
| | | carbon disulfide | 0.08 | 0.37 | |
| | | carbon tetrachloride | 0.01 | 0.02 | |
| | | chlorine | 0.0016 | 0.0078 | |
| | | chlorobenzene | 0.17 | 0.73 | |
| | | chloroethane | 1.05 | 4.59 | |
| | | chloroform | 0.01 | 0.06 | |
| | | chloromethane | 0.12 | 0.51 | |
| | | chromium | 0.00578 | 0.0253 | |
| | | cis-1,3-dichloropropene | 0.02 | 0.08 | |
| | | cobalt [†] | 19.5 | 85.41 | |
| | | cumene | 0.01 | 0.03 | |
| | | dimethylphthalate | 0.002 | 0.01 | |
| | | ethyl acrylate | 0.11 | 0.46 | |
| | | ethyl benzene - listed twice | 0.09 | 0.38 | |
| | | ethyl benzene - listed twice | 0.01 | 0.03 | |
| | | ethylene dibromide | 0.01 | 0.01 | |
| | | hexachlorobenzene | 0.01 | 0.02 | |
| | | hexachlorobutadiene | 0.01 | 0.03 | |

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| | | | | | |
|--|--|----------------------------------|----------|----------|--|
| | | hexachlorocyclopentadiene | 0.01 | 0.03 | |
| | | hexachloroethane | 0.01 | 0.04 | |
| | | hydrogen chloride | 9.52 | 41.7 | |
| | | hydroquinone | 0.01 | 0.05 | |
| | | iodomethane | 0.03 | 0.13 | |
| | | lead | .06 | .263 | |
| | | manganese | 0.043 | 0.188 | |
| | | mercury | 0.0694 | 0.304 | |
| | | methyl methacrylate | 0.01 | 0.05 | |
| | | methylene chloride | 2.24 | 9.8 | |
| | | naphthalene | 0.29 | 1.29 | |
| | | n-hexane | 0.06 | 0.27 | |
| | | nickel [†] | 19.5 | 85.41 | |
| | | nitrobenzene | 0.005 | 0.02 | |
| | | N-nitrosodiphenylamine | 0.003 | 0.01 | |
| | | n-nitrosomorpholine | 0.01 | 0.04 | |
| | | ortho-aniside | 0.01 | 0.04 | |
| | | ortho-toluidine | 0.004 | 0.02 | |
| | | o-xylene | 0.08 | 0.35 | |
| | | pentachlorophenol | 0.02 | 0.07 | |
| | | phenol | 0.05 | 0.22 | |
| | | selenium | 0.0075 | 0.0329 | |
| | | Silver - in Application | | | |
| | | styrene | 0.03 | 0.12 | |
| | | tert-butyl methyl ether | 0.01 | 0.02 | |
| | | tetrachloroethene | 0.01 | 0.07 | |
| | | toluenetrans-1,3-dichloropropene | 0.010.01 | 0.190.05 | |
| | | trichloroethene | 0.06 | 0.28 | |
| | | vinyl acetate | 0.01 | 0.02 | |
| | | vinyl bromide | 0.01 | 0.06 | |
| | | vinyl chloride | 0.44 | 1.91 | |
| | | m/p xylene | 0.21 | 0.92 | |

| | | | | | |
|----|---------|---------------------------|--------|--------|----|
| P3 | Kiln #3 | PM | 27.0 | 118.3 | 42 |
| | | PM ₁₀ | 27.0 | 118.3 | |
| | | SO ₂ | 961.0 | 2090.0 | |
| | | VOC | 13.4 | 58.87 | |
| | | CO | 220.0 | 482.0 | |
| | | NO _x | 1568.0 | 4230.0 | |
| | | 1,1,1-trichloroethane | 0.01 | 0.01 | |
| | | 1,1,2,2-tetrachloroethane | 0.01 | 0.04 | |
| | | 1,1,2-trichloroethane | 0.01 | 0.03 | |
| | | 1,1-dichloroethane | 0.01 | 0.01 | |
| | | 1,1-dichloroethene | 0.01 | 0.02 | |
| | | 1,2,4-trichlorobenzene | 0.01 | 0.02 | |

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|--|--|--|----------|----------|--|
| | | 1,2-dichloroethane | 1.67 | 7.32 | |
| | | 1,2-dichloropropane | 0.01 | 0.02 | |
| | | 1,2-epoxybutane | 0.07 | 0.3 | |
| | | 1,3-butadiene | 0.49 | 2.13 | |
| | | (cis/trans)1,3-dichloropropene | 0.01 | 0.02 | |
| | | 1,4-dichlorobenzene | 0.01 | 0.01 | |
| | | 1,4-phenylene-diamine | 0.06 | 0.26 | |
| | | 2,4,5-trichlorophenol | 0.01 | 0.02 | |
| | | 2,4,6-trichlorophenol | 0.17 | 0.76 | |
| | | 2,4-dinitrophenol | 0.01 | 0.03 | |
| | | 2,4-dinitrotoluene | 0.01 | 0.01 | |
| | | 2-butanone | 0.2 | 0.87 | |
| | | 3,3-dichlorobenzidine | 0.01 | 0.01 | |
| | | 3,3-dimethoxybenzidine | 0.01 | 0.02 | |
| | | 4-dinitrophenol | 0.01 | 0.03 | |
| | | 4-methyl-2-pentanone | 0.01 | 0.03 | |
| | | acrylonitrile | 0.01 | 0.02 | |
| | | allyl chloride | 0.15 | 0.66 | |
| | | aniline | 0.01 | 0.02 | |
| | | antimony | 12.9 | 56.6 | |
| | | arsenic | 0.0005 | 0.00219 | |
| | | benzene | 0.03 | 0.11 | |
| | | benzidine | 0.01 | 0.01 | |
| | | beryllium | 0.00007 | 0.000274 | |
| | | bis(2-chloroethyl)etherbis(2-ethylhexyl)phthlate | 0.010.74 | 0.023.24 | |
| | | bromodichloromethane | 0.02 | 0.09 | |
| | | bromodichloromethane | 0.01 | 0.06 | |
| | | bromoform | 0.26 | 1.13 | |
| | | bromomethane | 0.00373 | 0.0163 | |
| | | cadmium | 0.01 | 0.01 | |
| | | carbon disulfide | 0.01 | 0.02 | |
| | | carbon tetrachloride | 1.34 | 5.85 | |
| | | chlorine | 0.01 | 0.06 | |
| | | chlorobenzene | 0.01 | 0.01 | |
| | | chloroethane | 0.22 | 0.95 | |
| | | chloroform | 1.95 | 8.53 | |
| | | chloromethane | 0.00403 | 0.0177 | |
| | | chromium | 27.0 | 118.3 | |
| | | cobalt [‡] | 0.01 | 0.04 | |
| | | cumene | 0.01 | 0.01 | |
| | | dimethylphthalate | 0.13 | 0.58 | |
| | | ethyl acrylate | 0.01 | 0.05 | |
| | | ethylbenzene | 0.01 | 0.02 | |
| | | ethylene dibromide | 0.01 | 0.01 | |
| | | hexachlorobenzene | 0.01 | 0.03 | |
| | | hexachlorobutadiene | 0.01 | 0.02 | |
| | | hexachlorocyclopentadiene | 0.01 | 0.02 | |
| | | hexachloroethane | 15.5 | 67.9 | |
| | | hydrogen chloride | 0.02 | 0.07 | |
| | | hydroquinone | 0.01 | 0.03 | |
| | | iodomethane | .10 | .438 | |
| | | lead | 0.43 | 1.89 | |
| | | m/p xylene | 0.0602 | 0.264 | |
| | | manganese | 0.0759 | 0.332 | |
| | | mercury | 0.01 | 0.05 | |

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| | | methyl methacrylate methylene chloride naphthalene n-hexane nickel ⁺ nitrobenzene N-nitrosodiphenylamine N-nitrosomorpholine ortho-anisidine ortho-toluidine o-xylene pentachlorophenol phenol selenium Silver - In Application styrene tert-butyl methyl ether tetrachloroethenoluene trichloroethene vinyl acetate vinyl bromide vinyl chloride 4-Nitrophenol | 0.24 0.38 0.07 27.0 0.02 0.01 0.01 0.01 0.01 0.2 0.01 0.09 0.0105 0.01 0.01 0.010 0.01 0.01 0.11 0.01 0.01 | 1.03 1.68 0.33 118.3 0.07 0.01 0.05 0.03 0.01 0.86 0.01 0.38 0.046 0.02 0.01 0.02 0.03 0.02 0.49 0.01 0.03 | |
| P4 | Discharge into Coal Mill #1 | PM PM ₁₀ | 0.1 0.1 | 0.2 0.1 | 47 |
| P5 | Discharge from Kiln #1 to #1 Bucket Conveyor | PM PM ₁₀ | 0.2 0.1 | 0.8 0.3 | 47 |
| P6 | 3 Clinker Cooler Baghouse | PM PM ₁₀ | 25.0 25.0 | 110.0 110.0 | 51 |
| P7 | Discharge into Coal Mill #2 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 47 |
| P8 | Discharge from Kiln #2 to #2 Bucket Conveyor | PM PM ₁₀ | 0.2 0.1 | 0.8 0.3 | 47 |
| P9 | Discharge into Coal Mill #3 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 47 |
| P10 | Discharge from Kiln #3 to #3 Bucket Conveyor | PM PM ₁₀ | 0.6 0.2 | 2.3 0.8 | 47 |
| P11 | Discharge from Bin #48 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 47 |

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|-----|---------------------------|------------------------|------------|------------|----|
| P12 | Discharge from Bin #48 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 47 |
| P13 | Discharge from Bin #47 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 47 |

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|-----|---|-----------------------------|------------|------------|----|
| P15 | Baghouse Discharge to #2 Bucket Conveyor | PM PM ₁₀ | 0.4 0.2 | 1.6 0.6 | 47 |
| P16 | Baghouse Discharge to #3 Bucket Conveyor | PM PM ₁₀ | 0.4 0.2 | 1.6 0.6 | 47 |
| P17 | Bin #49 Sock Filter | PM PM ₁₀ | 0.5 0.5 | 1.9 1.9 | 52 |
| P18 | #1 CKD Bin Baghouse | Source Removed From Service | | | |
| P19 | #2 CKD Bin Baghouse | Source Removed From Service | | | |
| P20 | Truck Loading of CKD | PM PM ₁₀ | 0.1 0.1 | 0.2 0.1 | 47 |
| P21 | Truck Unloading of CKD | PM PM ₁₀ | 0.1 0.1 | 0.2 0.1 | 47 |
| P22 | Trailer Unloading of CKD | PM PM ₁₀ | 0.1 0.1 | 0.2 0.1 | 47 |
| P23 | CKD Pile | PM PM ₁₀ | 1.2 0.6 | 5.2 2.6 | 54 |
| P24 | Transfer from Main Coal Pile | PM PM ₁₀ | 0.2 0.1 | 0.6 0.2 | 47 |
| P26 | Drag Conveyor Transfer Point Kiln #1 | PM PM ₁₀ | 0.1 0.1 | 0.3 0.1 | 47 |
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| P27 | Drag Conveyor Transfer Point Kiln #1 | PM PM ₁₀ | 0.1 0.1 | 0.3 0.1 | 47 |
| P28 | Drag Conveyor Transfer Point Kiln #2 | PM PM ₁₀ | 0.1 0.1 | 0.3 0.1 | 47 |
| P29 | Drag Conveyor Transfer Point Kiln #2 | PM PM ₁₀ | 0.1 0.1 | 0.3 0.1 | 47 |
| P30 | Drag Conveyor Transfer Point Kiln #3 | PM PM ₁₀ | 0.1 0.1 | 0.4 0.2 | 47 |
| P31 | Drag Conveyor Transfer Point Kiln #3 | PM PM ₁₀ | 0.1 0.1 | 0.4 0.2 | 47 |
| P32 | 1500 Ton CKD Storage Bin | PM PM ₁₀ | 0.5 0.5 | 1.9 1.9 | 47 |
| P33 | CKD Handling Screw Conveyor Bin Vent | PM PM ₁₀ | 0.1 0.1 | 0.2 0.2 | 47 |
| P34 | Kiln #3 Dust Scoop Bin Vent | PM PM ₁₀ | 0.2 0.2 | 0.6 0.6 | 47 |
| P35 | CKD Handling 500 Ton Silo Baghouse | PM PM ₁₀ | 0.3 0.3 | 1.2 1.2 | 47 |
| P36 | Truck Loading of CKD (North of Hwy. 108) | PM PM ₁₀ | 0.1 0.1 | 0.3 0.1 | 47 |
| M1 | Loading Reclaim Elevator | PM PM ₁₀ | 1.2 0.5 | 5.2 1.8 | 55 |

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| M3 | Gypsum Discharge into Finish Mill #4 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M4 | Gypsum Discharge to Gypsum Elevator | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M8 | Discharge of B Belt to Finish Mill #2 | PM PM ₁₀ | 0.5 0.2 | 2.0 0.7 | 55 |
| M9 | Tripper Discharge into Bins | PM PM ₁₀ | 0.1 0.1 | 0.2 0.1 | 55 |
| M10 | Discharge from Bin #45 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M11 | Discharge into Bin #43 | PM PM ₁₀ | 0.3 0.1 | 1.0 0.4 | 55 |
| M12 | Discharge from Bin #44 | PM PM ₁₀ | 0.1 0.1 | 0.4 0.2 | 55 |
| M13 | Discharge from Bin #43 | PM PM ₁₀ | 0.3 0.1 | 1.0 0.4 | 55 |
| M14 | Transfer from Admix Weigh Feeder to B Belt | PM PM ₁₀ | 0.3 0.1 | 1.0 0.4 | 55 |
| M15 | Transfer from Bin #42 Feeder to B Belt | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M16 | #2 Finish Mill Baghouse | PM PM ₁₀ | 0.7 0.7 | 3.0 3.0 | 59 |
| M17 | #2 Finish Mill Baghouse-Mill Sweep | PM PM ₁₀ VOC Diethanolamine Ethylene Glycol | 0.5 0.5 3.8 0.2 0.1 | 2.0 2.0 16.3 0.6 0.2 | 61 |
| M18 | #4 Finish Mill Baghouse | PM PM ₁₀ | 1.1 1.1 | 4.7 4.7 | 63 |
| M19 | #4 Finish Mill | PM | 1.6 | 6.7 | 65 |

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|-----|---|---|--|--|----|
| | Discharge Baghouse-Mill Sweep | PM ₁₀ VOC Diethanolamine Ethylene Glycol | 1.6 27.8 1.0 0.4 | 6.7 122.0 4.1 1.4 | |
| M20 | Dryer Scrubber | PM PM ₁₀ SO ₂ VOC CO NO _x | 0.4 0.2 0.1 0.5 6.3 7.5 | 1.8 0.9 0.2 1.9 27.6 32.9 | 67 |
| M21 | Discharge from Bin #42 to Feeder | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M22 | Discharge from Bin #41 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M23 | Transfer from Bin #41 Conveyor Belt to A1 Conveyor Belt | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M24 | Discharge from Bin #40 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M25 | Discharge from D Belt into Chalk Dryer | PM PM ₁₀ | 0.2 0.1 | 0.6 0.2 | 55 |
| M26 | Transfer to D Belt | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M27 | Discharge from Bin #39 | PM PM ₁₀ | 0.1 0.1 | 0.4 0.2 | 55 |
| M28 | Transfer to Dry Feed Belt | PM PM ₁₀ | 0.1 0.1 | 0.4 0.2 | 55 |
| M29 | Transfer to Dry Feed Belt | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M30 | Transfer from #1 Clinker Bin to Dry Feed Belt | PM PM ₁₀ | 0.4 0.2 | 1.6 0.6 | 55 |
| M31 | Discharge from Bin #38 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |

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|-----|---|------------------------|------------|------------|----|
| M32 | Discharge from Bin #38 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M33 | Discharge from Bin #37 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M34 | Transfer from Bin #37 to A1 Belt | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M35 | Discharge from Bin #36 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M36 | Transfer to A1 Belt | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M37 | Transfer to A1 Belt | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M38 | Transfer to A1 Belt | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M39 | Discharge Into Raw Mill #3 | PM PM ₁₀ | 0.2 0.1 | 0.5 0.2 | 55 |
| M40 | Discharge from Gypsum Elevator into Feed Mill #4 | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 55 |
| M42 | Bin #36 Dust Collector | PM PM ₁₀ | 0.3 0.3 | 0.9 0.9 | 69 |
| M43 | Bin #37 Dust Collector | PM PM ₁₀ | 0.3 0.3 | 0.9 0.9 | 69 |
| M44 | Bin #39 Dust Collector | PM PM ₁₀ | 0.3 0.3 | 0.9 0.9 | 69 |
| M45 | Bin #44 Dust Collector | PM PM ₁₀ | 0.3 0.3 | 0.9 0.9 | 69 |
| F4 | Long Term Coal Pile | PM PM ₁₀ | 0.2 0.1 | 0.9 0.5 | 71 |
| F5 | Active Coal Pile | PM PM ₁₀ | 0.2 0.1 | 0.6 0.3 | 73 |
| F6 | Discharge into Feed Hopper #5 | PM PM ₁₀ | 0.6 0.3 | 1.7 0.6 | 75 |
| F8 | Transfer from | PM | 0.1 | 0.1 | 75 |

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|----------|--|--|---------------------------|--------------------------|----|
| | #208 Belt to #210 Belt | PM ₁₀ | 0.1 | 0.1 | |
| F9 | Discharge into Feed Hopper #4 | PM PM ₁₀ | 0.6 0.3 | 1.7 0.6 | 75 |
| F11 | Discharge from Hopper #4 Vibrating Feeder to #206 Belt | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 75 |
| F12 | Discharge from Hopper #5 Vibrating Feeder to #206 Belt | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 75 |
| F13 | Transfer from #206 Belt to #208 Belt | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 75 |
| F14 | Transfer from Stacker Belt to Active Coal Pile | PM PM ₁₀ | 0.6 0.3 | 1.7 0.6 | 75 |
| F15 | Unloading into Long Term Coal Pile | PM PM ₁₀ | 0.5 0.2 | 1.2 0.5 | 75 |
| F16 | Transfer from Long Term Coal Pile to Active Pile | PM PM ₁₀ | 0.5 0.2 | 1.2 0.5 | 75 |
| F17 | Transfer from Coal Feeders to Underbelt | PM PM ₁₀ | 0.2 0.1 | 0.6 0.2 | 75 |
| F18 | Railcar Unloading into Coal Hoppers 4 and 5 | PM PM ₁₀ | 0.6 0.3 | 2.7 1.0 | 75 |
| F19, F20 | LWDF Tanks Thermal Oxidizer and Carbon | PM PM ₁₀ SO ₂ VOC | 0.1 0.1 0.1 16.9 | 0.2 0.2 0.1 3.0 | 77 |

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| | Adsorption System | CO NO _x Xylene Toluene Methylene Chloride Ethyl Benzene Styrene Tetrachloroethane 1,1,2-trichloroethane Benzene | 0.5 0.6 1.3 0.7 0.1 0.2 0.1 0.1 0.1 0.1 | 2.0 2.4 0.3 0.2 0.1 0.1 0.1 0.1 0.1 0.1 | |
| S1 | Truck Loadout DC #31 | PM PM ₁₀ | 0.2 0.2 | 0.8 0.8 | 82 |
| S3 | Truck Loadout DC #49 | PM PM ₁₀ | 0.7 0.7 | 3.0 3.0 | 82 |
| S4 | Kaiser Silos DC #21 | PM PM ₁₀ | 0.5 0.5 | 2.1 2.1 | 84 |
| S5 | Kaiser Silos DC #22 | PM PM ₁₀ | 0.2 0.2 | 0.7 0.7 | 84 |
| S6 | Delta Silo DC #23 | PM PM ₁₀ | 0.6 0.6 | 2.5 2.5 | 84 |
| S7 | Rail Silos DC #24 | PM PM ₁₀ | 0.7 0.7 | 3.0 3.0 | 84 |
| S8 | Kaiser Silos DC #29 | PM PM ₁₀ | 0.2 0.2 | 0.8 0.8 | 84 |
| S9 | Kaiser Silos DC #30 | PM PM ₁₀ | 0.2 0.2 | 0.7 0.7 | 84 |
| S10 | Rail Silos DC #25 | PM PM ₁₀ | 0.4 0.4 | 1.6 1.6 | 84 |
| S11 | Packer DC #26 | PM PM ₁₀ | 0.7 0.7 | 3.0 3.0 | 84 |
| S12 | Packer DC #27 | PM PM ₁₀ | 0.6 0.6 | 2.5 2.5 | 84 |
| S13 | Truck Loadout DC #28 | PM PM ₁₀ | 0.5 0.5 | 2.0 2.0 | 82 |
| C1 | Clinker Transfer Tower Baghouse | PM PM ₁₀ | 1.8 1.8 | 7.6 7.6 | 86 |
| C2 | Outside | PM | 1.3 | 5.4 | 88 |

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| | Clinker Truck Unloading | PM ₁₀ | 0.5 | 1.9 | |
| C3 | Outside Clinker Reclaim Hopper Loading | PM PM ₁₀ | 0.6 0.2 | 2.3 0.8 | 88 |
| C4 | Outside Clinker Storage Pile | PM PM ₁₀ | 0.1 0.1 | 0.3 0.2 | 91 |
| C5 | Discharge from Clinker Reclaim Hopper | PM PM ₁₀ | 0.6 0.2 | 2.3 0.8 | 88 |
| C6 | Clinker Railcar and Truck Hopper Loading | PM PM ₁₀ | 0.2 0.1 | 0.8 0.3 | 88 |
| C7 | Clinker Discharge to Railcar/Truck | PM PM ₁₀ | 0.2 0.1 | 0.8 0.3 | 88 |
| C8 | Transfer from Reclaim Belt to #7 Belt | PM PM ₁₀ | 0.6 0.2 | 2.3 0.8 | 88 |
| C9 | Transfer to #7 Belt | PM PM ₁₀ | 0.2 0.1 | 0.6 0.2 | 88 |
| C10 | Transfer from #7 Belt to #8 Belt | PM PM ₁₀ | 0.7 0.3 | 2.8 1.0 | 88 |
| C11 | Transfer from #8 Belt to #9 Belt | PM PM ₁₀ | 0.9 0.3 | 3.6 1.3 | 88 |
| C13 | #2 Clinker Bin Dust Collector | PM PM ₁₀ | 0.1 0.1 | 0.4 0.4 | 93 |
| C14 | B Belt Dust Collector | PM PM ₁₀ | 0.1 0.1 | 0.4 0.4 | 93 |
| C15 | Discharge from #2 Clinker Bin to B Belt | PM PM ₁₀ | 0.1 0.1 | 0.4 0.2 | 88 |

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| C16 | Discharge into #2 Clinker Bin | PM PM ₁₀ | 0.9 0.3 | 3.6 1.3 | 88 |
| C17 | Transfer from #9 Belt | PM PM ₁₀ | 0.9 0.3 | 3.6 1.3 | 88 |
| C18 | Clinker Dust Elevator Collector | PM PM ₁₀ | 0.1 0.1 | 0.4 0.4 | 93 |
| C19 | Discharge from #1 Clinker Bin | PM PM ₁₀ | 0.1 0.1 | 0.4 0.2 | 88 |
| C20 | Transfer to Belt Conveyor | PM PM ₁₀ | 0.1 0.1 | 0.4 0.2 | 88 |
| C21 | Discharge into #1 Clinker Bin | PM PM ₁₀ | 0.1 0.1 | 0.4 0.4 | 88 |
| C26 | West Clinker Silo Dust Collector | PM PM ₁₀ | 0.8 0.8 | 3.2 3.2 | 93 |
| C27 | 4A2 Belt Dust Collector | PM PM ₁₀ | 0.6 0.6 | 2.7 2.7 | 93 |
| C28 | Transfer to 4A Belt | PM PM ₁₀ | 0.2 0.1 | 0.7 0.3 | 88 |
| C32 | East Clinker Silo Dust Collector | PM PM ₁₀ | 0.8 0.8 | 3.2 3.2 | 93 |
| C33 | 440 Belt Dust Collector | PM PM ₁₀ | 0.1 0.1 | 0.4 0.4 | 93 |
| C34 | West Clinker Tank Dust Collector | PM PM ₁₀ | 0.1 0.1 | 0.4 0.4 | 93 |
| C35 | East Clinker Tank Dust Collector | PM PM ₁₀ | 0.1 0.1 | 0.4 0.4 | 93 |
| C36 | Discharge into Clinker Elevator | PM PM ₁₀ | 1.7 0.6 | 7.4 2.6 | 88 |
| C37 | Discharge into Clinker Elevator | PM PM ₁₀ | 0.2 0.1 | 0.5 0.2 | 88 |

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| C41 | Off-SPEC Bin and Ancillary Equipment Dust Collector | PM PM ₁₀ | 0.4 0.4 | 1.4 1.4 | 93 |
| C42 | Clinker Dome Dust Collector | PM PM ₁₀ | 0.6 0.6 | 1.9 1.9 | 93 |
| C43 | Reclaim Belt Dust Collector | PM PM ₁₀ | 0.2 0.2 | 0.5 0.5 | 93 |
| C44 | Off-Spec Bin Dust Collector | PM PM ₁₀ | 0.17 | 0.75 | 93 |
| R1 | Truck Unloading for Sand/Iron Ore | PM PM ₁₀ | 1.9 0.7 | 8.0 2.8 | 96 |
| R2 | Chalk Storage Pile | PM PM ₁₀ | 0.1 0.1 | 0.3 0.2 | 98 |
| R3 | Discharge from Chalk Feeder | PM PM ₁₀ | 0.1 0.1 | 0.2 0.1 | 96 |
| R4 | Discharge from Gypsum Feeder | PM PM ₁₀ | 0.3 0.1 | 1.0 0.4 | 96 |
| R5 | Gypsum Storage Pile | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 100 |
| R6 | Discharge from Sand/Iron-ore Feeder | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 96 |
| R8 | Sand/Iron Ore Storage Transfer | PM PM ₁₀ | 0.4 0.2 | 1.5 0.5 | 96 |
| R9 | Discharge from Emergency Feeder | PM PM ₁₀ | 0.3 0.1 | 1.0 0.4 | 96 |
| R10 | Discharge of Gypsum Belt | PM PM ₁₀ | 0.8 0.3 | 3.2 1.2 | 96 |
| R11 | Discharge into Secondary Crusher | PM PM ₁₀ | 0.1 0.1 | 0.2 0.1 | 96 |

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| R12 | Secondary Crusher | PM PM ₁₀ | 0.2 0.2 | 0.8 0.8 | 102 |
| R13 | Secondary Crusher Discharge | PM PM ₁₀ | 0.1 0.1 | 0.2 0.1 | 96 |
| R14 | Transfer to #2 Belt | PM PM ₁₀ | 0.1 0.1 | 0.2 0.1 | 96 |
| R15 | Discharge from Gypsum Hopper | PM PM ₁₀ | 0.1 0.1 | 0.2 0.1 | 96 |
| R16 | Gypsum Truck Discharge into Hopper | PM PM ₁₀ | 0.8 0.3 | 3.2 1.2 | 96 |
| R17 | Long Term Sand Pile | PM PM ₁₀ | 0.1 0.1 | 0.4 0.2 | 104 |
| R18 | Iron Ore Storage Pile | PM PM ₁₀ | 0.2 0.1 | 0.6 0.3 | 106 |
| R19 | Sand Storage Pile | PM PM ₁₀ | 0.1 0.1 | 0.1 0.1 | 108 |
| R20 | Emissions from Haul Roads | PM PM ₁₀ | 13.1 3.3 | 47.2 12.0 | 110 |
| R22 | Portable Crusher | PM PM ₁₀ SO ₂ VOC CO NO _x | 0.3 0.3 0.2 0.2 0.6 2.5 | 1.3 1.0 0.8 0.9 2.3 10.6 | 111 |
| R24 | Transfer from Portable Crusher to Main Conveyor | PM PM ₁₀ | 0.3 0.2 | 1.3 0.5 | 96 |
| Q1 | Quarry Haul Road | PM PM ₁₀ | 23.5 5.133 | 102.8 22.5 | 113 |
| Q2 | Primary Crusher | PM PM ₁₀ | 0.5 0.5 | 1.9 1.9 | 114 |
| Q3 | Quarry Belt Turning Point Transfer from | PM PM ₁₀ | 0.1 0.1 | 0.4 0.4 | 115 |

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| | | | | | |
|----|--|------------------------|------------|------------|-----|
| | 2N to 1N | | | | |
| Q4 | Transfer from Belt 1N to Tripper Belt | PM PM ₁₀ | 0.1 0.1 | 0.4 0.4 | 115 |
| Q5 | Discharge of Tripper Belt to Chalk Storage | PM PM ₁₀ | 0.1 0.1 | 0.4 0.4 | 115 |
| Q6 | Scraper Dumping to Auxiliary System | PM PM ₁₀ | 0.1 0.1 | 0.2 0.2 | 115 |
| Q7 | Hopper 3 Discharge to 1.12 Belt (Auxiliary System) | PM PM ₁₀ | 0.1 0.1 | 0.2 0.2 | 115 |
| Q8 | Auxiliary Crusher | PM PM ₁₀ | 1.1 0.5 | 4.7 2.2 | 117 |
| Q9 | Discharge of Belt 1 to Tripper Belt | PM PM ₁₀ | 0.1 0.1 | 0.2 0.2 | 115 |

‡ While it is assumed that these metals are indeed emitted, as they are naturally occurring metals present in the raw materials used to manufacture cement, Ash Grove was not able to calculate an emission rate. Ash Grove requests the use of the particulate matter emission rate of 19.5 lb/hr and 85.41 tpy for Kiln 1 and 2, 27.0 lb/hr and 118.3 tpy for Kiln 3, as stated in the HWC NESHAP (September 29, 1999, 64 FR 52879) preamble be incorporated as limits for nickel and cobalt.

SECTION III: PERMIT HISTORY

Permit #75-A was issued to Arkansas Cement Corporation Foreman Production facilities on or about September 21, 1971. This permit allowed the installation of three "Precipitair" electrostatic precipitators and supporting equipment at the existing facility. Proposed emissions were 29.58 lb/hr of particulates.

Permit #75-A (modification) allowed the facility to use coal instead of natural gas as the primary fuel to fire the three cement kilns and to replace the three previously approved electrostatic precipitators. This amendment was issued on September 15, 1976.

Permit #75-A (modification) was issued on March 26, 1982. This modification allowed Arkansas Cement to install a gravel bed filter to control particulate discharge from the clinker coolers to replace the multiclone that was being used. Permitted emission rates dropped from 475 lb/hr to 25 lb/hr of particulate.

Permit #75-AR-3 was issued on May 27, 1983, and it rescinded the modification issued on March 26, 1982, because the facility decided to install a Fuller fabric filter with heat recovery instead of the gravel bed filter. This modification also included the replacement of part of the clinker handling system and the installation of a baghouse to control emissions generated at this crossover point. This modification added 1 lb/hr of particulate emissions.

Permit #75-AR-4 was issued on January 29, 1988. This modification changed the name of the facility to Ash Grove Cement Company and consolidated the existing emissions sources into one permit and placed restrictions on the use of waste-derived fuel at this facility. This permit allowed emissions of 99.9 lb/hr of TSP, 787 lb/hr of SO₂, 39 lb/hr of chlorine, 0.048 lb/hr of lead, and 0.006 lb/hr of chromium.

Permit #75-AR-5 was issued on June 30, 1989. This permit allowed Ash Grove to burn solid hazardous waste in the cement kilns. This permit allowed emissions of 92.2 lb/hr TSP, 1574 lb/hr of SO₂, 164.6 lb/hr of HCl, 0.22 lb/hr of lead, and 0.316 lb/hr of chromium.

Permit #75-AR-6 was issued on July 8, 1991. This permit allowed Ash Grove to change the outlet nozzles of the ESPs so that each kiln could vent to a single stack. Emissions were not increased due to this modification.

Permit #75-AR-7 was issued on November 13, 1991. This modification allowed all sources, regardless of size, to be permitted. No changes in operation were made. Emissions consisted of 553 tpy TSP, 6,894.1 tpy SO₂, 721 tpy HCl, 0.964 tpy lead, and 1.39 tpy chromium.

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Permit #75-AR-8 was issued on June 15, 1994. This permit covered the installation of CEMS required by the BIF rule. Permit #75-AR-7 was modified so that the Air Permit monitoring requirements for SO₂, NO_x, and CO could be satisfied by the new CEMS. This modification also added two product storage silos and related materials handling equipment to improve the loading and shipping of finished product, and modified four existing dust control baghouses in a manner that resulted in four new point discharge stacks. The carbon adsorption system on the liquid waste fuel storage tanks was replaced by a liquid nitrogen recovery condenser. These changes did not result in any changes to the emission rates at this facility.

Permit #75-AR-9 was issued on February 11, 1998. This modification authorized Ash Grove to burn waste tires as fuel. Emission rates for SO₂ were increased and emission rates for NO_x and CO were added. Emission totals listed in this permit were 567 tpy PM₁₀, 5,740 tpy SO₂, 1,183 tpy CO, 9,080 tpy NO_x, 0.964 tpy lead, and 3.0 tpy VOC.

Permit 1235-AR-1 was issued on November 7, 1995. This permit is for the limestone quarry located at the Ash Grove site. The requirements for this quarry are being incorporated into this permit. The quarry is permitted to emit 4.3 lb/hr and 19.0 tpy of PM/PM₁₀.

Permit 75-AOP-R0 was the initial Title V permit issued to Ash Grove Cement in Foreman, Arkansas. This permit allowed for several changes at this facility. The portable crusher (SN-R22) was permitted for the first time. Ash Grove has installed 10 new LWDF tanks and changed the control device to a thermal oxidizer with a carbon adsorption backup system. A clinker storage dome was added to the facility and the ESPs used to control emissions from the kilns were refurbished. Also, the quarry (formerly permitted under permit #1235-AR-1) which supplies limestone for use in the cement kilns was included in this permit. The permit also incorporated the requirements of 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, and 40 CFR Part 63, Subpart EEE, *National Emission Standards for Hazardous Air Pollutants From Hazardous Waste Combustors*.

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SECTION IV: EMISSION UNIT INFORMATION

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SN-P1
Kiln #1

Source Description

This kiln is used to produce the clinker product. It may be fired by coal, natural gas, tire-derived fuel, liquid waste-derived fuel, or solid waste-derived fuel. This kiln can produce up to 50 tons per hour of clinker. Particulate emissions are controlled by an electrostatic precipitator with an efficiency of 99%.

Specific Conditions

1. Pursuant to §19.501 et seq of the Regulations of the Arkansas State Implementation Plan for Air Pollution Control, effective February 15, 1999 (Regulation 19) and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Conditions #5, #6, and #8.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM ₁₀ | 19.5 | 85.4 |
| VOC | 9.6 | 42.1 |

2. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #4.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| SO ₂ | 849.0 | 1960.0 |
| CO | 172.0 | 368.0 |
| NO _x | 889.0 | 2405.0 |

3. Pursuant to §18.801 of the Arkansas Air Pollution Control Code, effective February 15, 1999 (Regulation 18) and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #8.

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| Pollutant | lb/hr | tpy |
|---------------------------|---------|---------|
| PM | 19.5 | 85.4 |
| 1,1,1-trichloroethane | 0.01 | 0.02 |
| 1,1,2,2-tetrachloroethane | 0.01 | 0.03 |
| 1,1,2-trichloroethane | 0.01 | 0.04 |
| 1,1-dichloroethane | 0.01 | 0.02 |
| 1,1-dichloroethene | 0.16 | 0.69 |
| 1,2,4-trichlorobenzene | 0.08 | 0.35 |
| 1,2-dichloroethane | 0.01 | 0.05 |
| 1,2-dichloropropane | 0.01 | 0.04 |
| 1,2-epoxybutane | 0.01 | 0.01 |
| 1,3-butadiene | 0.02 | 0.07 |
| 1,4-dichlorobenzene | 0.19 | 0.18 |
| 1,4-phenylene-diamine | 0.01 | 0.03 |
| 2,4,5-trichlorophenol | 0.01 | 0.03 |
| 2,4,6-trichlorophenol | 0.01 | 0.05 |
| 2,4-dinitrophenol | 0.03 | 0.11 |
| 2,4-dinitrotoluene | 0.02 | 0.01 |
| 2-butanone | 0.21 | 0.91 |
| 3,3-dichlorobenzidine | 0.01 | 0.04 |
| 3,3-dimethoxybenzidine | 0.01 | 0.04 |
| 4-methyl-2-pentanone | 0.02 | 0.09 |
| 4-nitrophenol | 0.02 | 0.07 |
| acrylonitrile | 0.03 | 0.11 |
| allyl chloride | 0.19 | 0.84 |
| aniline | 0.005 | 0.02 |
| antimony | 8.80 | 38.5 |
| arsenic | .00258 | .00112 |
| benzene | 0.22 | 0.95 |
| benzidine | 0.004 | 0.02 |
| beryllium | 0.00028 | .00123 |
| bis(2-chloroethyl)ether | 0.01 | 0.03 |
| bis(2-ethylhexyl)phthlate | 0.004 | 0.02 |
| bromodichloromethane | 0.01 | 0.02 |
| bromoform | 0.01 | 0.03 |
| bromomethane | 0.26 | 1.15 |
| cadmium | .0307 | 0.134 |
| carbon disulfide | 0.08 | 0.37 |
| carbon tetrachloride | 0.01 | 0.02 |
| chlorine | 0.00162 | 0.00780 |
| chlorobenzene | 0.17 | 0.73 |
| chloroethane | 1.05 | 4.59 |
| chloroform | 0.01 | 0.06 |
| chloromethane | 0.12 | 0.51 |

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| | | |
|---------------------------|---------|----------|
| chromium | 0.00578 | 0.0253 |
| cis-1,3-dichloropropene | 0.01 | 0.05 |
| cobalt_ | 19.5 | 85.41 |
| cumene | 0.01 | 0.03 |
| dimethylphthalate | .002 | 0.01 |
| ethyl acrylate | 0.11 | 0.46 |
| ethylbenzene | 0.09 | 0.38 |
| ethylene dibromide | 0.01 | 0.01 |
| hexachlorobenzene | 0.01 | 0.02 |
| hexachlorobutadiene | 0.01 | 0.03 |
| hexachlorocyclopentadiene | 0.01 | 0.03 |
| hexachloroethane | 0.01 | 0.04 |
| hydrogen chloride | 9.52 | 41.7 |
| hydroquinone | 0.01 | 0.05 |
| iodomethane | 0.03 | 0.13 |
| lead | .06 | .263 |
| manganese | 0.0430 | 0.188 |
| mercury | 0.0694 | 0.304 |
| methyl methacrylate | 0.01 | 0.05 |
| methylene chloride | 2.24 | 9.80 |
| naphthalene | 0.29 | 1.29 |
| n-hexane | 0.06 | 0.27 |
| nickel_ | 19.5 | 85.41 |
| nitrobenzene | 0.005 | 0.02 |
| N-nitrosodiphenylamine | 0.03 | 0.01 |
| N-nitrosomorpholine | 0.01 | 0.04 |
| ortho-anisidine | 0.01 | 0.04 |
| ortho-toluidine | 0.04 | 0.02 |
| o-xylene | 0.08 | 0.35 |
| pentachlorophenol | 0.02 | 0.07 |
| phenol | 0.05 | 0.22 |
| selenium | 0.0075 | 0.0329 |
| styrene | 0.03 | 0.12 |
| tert-butyl methyl ether | 0.01 | 0.02 |
| tetrachloroethene | 0.06 | 0.020.28 |
| toluene | 0.04 | 0.19 |
| trans-1,3-dichloropropene | 0.01 | 0.05 |
| trichloroethene | 0.06 | 0.28 |
| vinyl acetate | 0.01 | 0.02 |
| vinyl bromide | 0.01 | 0.06 |
| vinyl chloride | 0.44 | 1.91 |
| xylene | 0.21 | 0.92 |

‡ While it is assumed that these metals are indeed emitted, as they are naturally occurring metals present in the raw materials used to manufacture cement, Ash Grove was not able to calculate an emission rate. Ash Grove requests the use of the particulate matter emission rate as limits for nickel and cobalt.

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4. Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain continuous emission monitors (CEMs) to record SO₂, CO, and NO_x emissions at this source. These CEMs shall be operated in accordance with all applicable conditions of the Department's Continuous Emission Monitoring Systems Conditions as found in Appendix A of this permit.
5. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR Part 70.6, the permittee shall operate the electrostatic precipitators used to control particulate emissions at this source at a minimum kVA of electrical power input to the electrostatic precipitator. This minimum kVA rating shall be the sum of the kVA levels for the individual field of the ESP and shall be the level determined by the most recent passing stack test performed. Ash Grove shall notify the Department, in writing, when the kVA level is changed. This notification shall include a copy of the test results and the new value for the rating. Compliance shall be demonstrated through compliance with Specific Condition #10.
6. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR Part 70.6, the permittee shall not produce more than 37,200 tons of clinker per month at this source. Compliance shall be demonstrated through compliance with the record keeping requirements set forth in Specific Condition #7.
7. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of clinker produced at this source. These records shall be kept on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. A rolling twelve month total of these amounts shall be kept on site and be made available to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.
8. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR Part 70.6, the permittee shall not exceed the feed rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #9.

| Fuel | Monthly Amount |
|-------------------|-------------------------|
| Natural Gas | 294.6 MMft ³ |
| Coal | 11,160 ton |
| Tire-derived Fuel | 1,488 ton |

| | |
|------|------------|
| LWDF | 11,160 ton |
| SWDF | 3,720 ton |

LWDF = Liquid Waste-derived Fuel

SWDF = Solid Waste-derived Fuel

9. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of the types and amounts of fuel used at this source. These records shall be kept on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. A rolling twelve month total of these amounts shall be kept on site and be made available to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.
10. **Pursuant to §19.703 of regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall record the sum of the electrical power input in kilovolt-amperes (kVA) to each field of the electrostatic precipitator used to control particulate emissions from this source. A reading of the electrical power input to each field of the electrostatic precipitator shall be taken a minimum of once per day of operation. These records shall be kept on site and made available to Department personnel upon request.**
11. **Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, 40 CFR Part 63.1209(a)(1), and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 20% opacity. No later than September 30, 2002, compliance shall be demonstrated with a continuous opacity monitor. Until installation and certification of the continuous opacity monitor occurs, the permittee shall continue to demonstrate compliance through compliance with Plantwide Condition #9.**

SN-P2
Kiln #2

Process Description

This kiln is used to produce the clinker product. It may be fired by coal, natural gas, tire-derived fuel, liquid waste-derived fuel, or solid waste-derived fuel. This kiln can produce up to 50 tons per hour of clinker. Particulate emissions are controlled by an electrostatic precipitator with an efficiency of 99%.

Specific Conditions

12. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Conditions #16, #17 and #18.

| Pollutant | lb/hr | tpy |
|------------------|-------|------|
| PM ₁₀ | 19.5 | 85.4 |
| VOC | 9.6 | 42.1 |

13. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #15.

| Pollutant | lb/hr | tpy |
|-----------------|-------|--------|
| SO ₂ | 753.0 | 1690.0 |
| CO | 152.0 | 333.0 |
| NO _x | 882.0 | 2450.0 |

14. Pursuant to §18.801 of the Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #18.

| Pollutant | lb/hr | tpy |
|----------------------------|---------|---------|
| PM | 19.5 | 85.4 |
| 1,1,1-trichloroethane | 0.01 | 0.02 |
| 1,1,2,2-tetrachloroethane | 0.01 | 0.03 |
| 1,1,2-trichloroethane | 0.01 | 0.04 |
| 1,1-dichloroethane | 0.01 | 0.02 |
| 1,1-dichloroethene | 0.16 | 0.69 |
| 1,2,4-trichlorobenzene | 0.08 | 0.35 |
| 1,2-dichloroethane | 0.01 | 0.05 |
| 1,2-dichloropropene | 0.01 | 0.02 |
| 1,2-epoxybutane | 0.01 | 0.01 |
| 1,3-butadiene | 0.02 | 0.07 |
| 1,4-dichlorobenzene | 0.19 | 0.18 |
| 1,4-phenylene-diamine | 0.01 | 0.03 |
| 2,4,5-trichlorophenol | 0.01 | 0.03 |
| 2,4,6-trichlorophenol | 0.01 | 0.05 |
| 2,4-dinitrophenol | 0.03 | 0.11 |
| 2,4-dinitrotoluene | 0.02 | 0.01 |
| 2-butanone | 0.21 | 0.91 |
| 3,3-dichlorobenzidine | 0.01 | 0.04 |
| 3,3-dimethoxybenzidine | 0.01 | 0.04 |
| 4-methyl-2-pentanone | 0.02 | 0.09 |
| 4-nitrophenol | 0.02 | 0.07 |
| acrylonitrile | 0.03 | 0.11 |
| allyl chloride | 0.19 | 0.84 |
| aniline | 0.005 | 0.02 |
| antimony | 8.80 | 38.5 |
| arsenic | .00258 | .00112 |
| benzene | 0.22 | 0.95 |
| benzidine | 0.004 | 0.02 |
| beryllium | 0.00028 | .00123 |
| bis(2-chloroethyl)ether | 0.01 | 0.03 |
| bis(2-ethylhexyl)phthalate | 0.004 | 0.02 |
| bromodichloromethane | 0.01 | 0.02 |
| bromoform | 0.01 | 0.03 |
| bromomethane | 0.26 | 1.15 |
| cadmium | .0307 | 0.134 |
| carbon disulfide | 0.08 | 0.37 |
| carbon tetrachloride | 0.01 | 0.02 |
| chlorine | 0.00162 | 0.00780 |
| chlorobenzene | 0.17 | 0.73 |
| chloroethane | 1.05 | 4.59 |
| chloroform | 0.01 | 0.06 |
| chloromethane | 0.12 | 0.51 |
| chromium | 0.00578 | 0.0253 |
| cis-1,3-dichloropropene | 0.01 | 0.05 |
| cobalt_ | 19.5 | 85.41 |
| cumene | 0.01 | 0.03 |
| dimethylphthalate | .002 | 0.01 |
| ethyl acrylate | 0.11 | 0.46 |
| ethylbenzene | 0.09 | 0.38 |
| ethylene dibromide | 0.01 | 0.01 |

| | | |
|---------------------------|--------|--------|
| hexachlorobenzene | 0.01 | 0.02 |
| hexachlorobutadiene | 0.01 | 0.03 |
| hexachlorocyclopentadiene | 0.01 | 0.03 |
| hexachloroethane | 0.01 | 0.04 |
| hydrogen chloride | 9.52 | 41.7 |
| hydroquinone | 0.01 | 0.05 |
| iodomethane | 0.03 | 0.13 |
| manganese | 0.0430 | 0.188 |
| lead | .06 | .263 |
| mercury | 0.0694 | 0.304 |
| methyl methacrylate | 0.01 | 0.05 |
| methylene chloride | 2.24 | 9.80 |
| naphthalene | 0.29 | 1.29 |
| n-hexane | 0.06 | 0.27 |
| nickel | 19.5 | 85.41 |
| nitrobenzene | 0.005 | 0.02 |
| N-nitrosodiphenylamine | 0.03 | 0.01 |
| N-nitrosomorpholine | 0.01 | 0.04 |
| ortho-anisidine | 0.01 | 0.04 |
| ortho-toluidine | 0.04 | 0.02 |
| o-xylene | 0.08 | 0.35 |
| pentachlorophenol | 0.02 | 0.07 |
| phenol | 0.05 | 0.22 |
| selenium | 0.0075 | 0.0329 |
| styrene | 0.03 | 0.12 |
| tert-butyl methyl ether | 0.01 | 0.02 |
| tetrachloroethene | 0.06 | 0.28 |
| toluene | 0.04 | 0.19 |
| trans-1,3-dichloropropene | 0.01 | 0.05 |
| trichloroethene | 0.06 | 0.28 |
| vinyl acetate | 0.01 | 0.02 |
| vinyl bromide | 0.01 | 0.06 |
| vinyl chloride | 0.44 | 1.91 |
| xylene | 0.21 | 0.92 |

‡ While it is assumed that these metals are indeed emitted, as they are naturally occurring metals present in the raw materials used to manufacture cement, Ash Grove was not able to calculate an emission rate. Ash Grove requests the use of the particulate matter emission rate as limits for nickel and cobalt.

15. Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain continuous emission monitors (CEMs) to record SO₂, CO, and NO_x emissions at this source. These CEMs shall be operated in accordance with all applicable conditions of the Department's Continuous Emission Monitoring Systems Conditions as found in Appendix A of this permit.
16. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR Part 70.6, the permittee shall operate the electrostatic precipitators used to control particulate emissions at this source at a minimum kVA of electrical power input to the electrostatic precipitator. This minimum kVA rating shall be the sum of the kVA levels for the individual field of the ESP and shall be the level determined by the most recent passing stack test performed. Ash Grove shall notify the Department, in

writing, when the kVA level is changed. This notification shall include a copy of the test results and the new value for the rating. Compliance shall be demonstrated through compliance with Specific Condition #21.

17. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR Part 70.6, the permittee shall not produce more than 37,200 tons of clinker per month at this source. Compliance shall be demonstrated through compliance with the record keeping requirements set forth on Specific Condition #19.
18. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR Part 70.6, the permittee shall not exceed the feed rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #20.

| Fuel | Monthly Amount |
|-------------------|-------------------------|
| Natural Gas | 294.6 MMft ³ |
| Coal | 11,160 ton |
| Tire-derived Fuel | 1,488 ton |
| LWDF | 11,160 ton |
| SWDF | 3,720 ton |

LWDF = Liquid Waste-derived Fuel

SWDF = Solid Waste-derived Fuel

19. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of clinker produced at this source. These records shall be kept on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. A rolling twelve month total of these amounts shall be kept on site and be made available to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.
20. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of the types and amounts of fuel used at this source. These records shall be kept on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. A rolling twelve month total of these amounts shall be kept on site and be made available to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.
21. **Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall record the sum of the electrical power input in kilovolt-amperes (kVA) to each field of the electrostatic precipitator used to control particulate emissions from this source. A reading of the electrical power input to each field of the electrostatic precipitator shall be taken a**

minimum of once per day of operation. These records shall be kept on site and made available to Department personnel upon request.

- 22. Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, 40 CFR Part 63.1209(a)(1), and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 20% opacity. No later than September 30, 2002, compliance shall be demonstrated with a continuous opacity monitor. Until installation and certification of the continuous opacity monitor occurs, the permittee shall continue to demonstrate compliance through compliance with Plantwide Condition #9.**

SN-P3
Kiln #3

Source Description

This kiln is used to produce the clinker product. It may be fired by coal, natural gas, tire-derived fuel, liquid waste-derived fuel, or solid waste-derived fuel. This kiln can produce up to 70 tons per hour of clinker. Particulate emissions are controlled by an electrostatic precipitator with an efficiency of 99%.

Specific Conditions

23. Pursuant to §19.501 et seq Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Conditions #27, #28, and #29.

| Pollutant | lb/hr | tpy |
|------------------|-------|-------|
| PM ₁₀ | 27.0 | 118.3 |
| VOC | 13.44 | 58.87 |

24. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #26.

| Pollutant | lb/hr | tpy |
|-----------------|--------|--------|
| SO ₂ | 961.0 | 2090.0 |
| CO | 220.0 | 482.0 |
| NO _x | 1568.0 | 4231.0 |

25. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #29.

| | | |
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| | | |
|--|--|--|

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| Pollutant | lb/hr | tpy |
|---------------------------------|---------|----------|
| PM | 27.0 | 118.3 |
| 1,1,1-trichloroethane | 0.01 | 0.01 |
| 1,1,2,2-tetrachloroethane | 0.01 | 0.04 |
| 1,1,2-trichloroethane | 0.01 | 0.03 |
| 1,1-dichloroethane | 0.01 | 0.01 |
| 1,1-dichloroethene | 0.01 | 0.02 |
| 1,2,4-trichlorobenzene | 0.01 | 0.02 |
| 1,2-dichloroethane | 1.67 | 7.32 |
| 1,2-dichloropropane | 0.01 | 0.04 |
| 1,2-epoxybutane | 0.07 | 0.3 |
| 1,3-butadiene | 0.49 | 2.13 |
| (cis, trans)1,3-dichloropropene | 0.03 | 0.13 |
| 1,4-dichlorobenzene | 0.01 | 0.01 |
| 1,4-phenylene-diamine | 0.06 | 0.26 |
| 2,4,5-trichlorophenol | 0.01 | 0.02 |
| 2,4,6-trichlorophenol | 0.17 | 0.76 |
| 2,4-dinitrophenol | 0.01 | 0.03 |
| 2,4-dinitrotoluene | 0.01 | 0.01 |
| 2-butanone | 0.2 | 0.87 |
| 3,3-dichlorobenzidine | 0.01 | 0.01 |
| 3,3-dimethoxybenzidine | 0.01 | 0.02 |
| 4-methyl-2-pentanone | 0.01 | 0.03 |
| 4-dinitrophenol | 0.01 | 0.03 |
| acrylonitrile | 0.01 | 0.02 |
| allyl chloride | 0.15 | 0.66 |
| aniline | 0.01 | 0.02 |
| antimony | 12.9 | 56.6 |
| arsenic | 0.0005 | 0.00219 |
| benzene | 0.03 | 0.11 |
| benzidine | 0.01 | 0.01 |
| beryllium | 0.00007 | 0.000274 |
| bis(2-chloroethyl)ether | 0.01 | 0.02 |
| bis(2-ethylhexyl)phthlate | 0.74 | 3.24 |
| bromodichloromethane | 0.02 | 0.09 |
| bromoform | 0.01 | 0.06 |
| bromomethane | 0.26 | 1.13 |
| cadmium | 0.00373 | 0.0163 |
| carbon disulfide | 0.01 | 0.01 |
| carbon tetrachloride | 0.01 | 0.02 |
| chlorine | 1.34 | 5.85 |
| chlorobenzene | 0.01 | 0.06 |
| chloroethane | 0.01 | 0.01 |
| chloroform | 0.22 | 0.95 |
| chloromethane | 1.95 | 8.53 |
| chromium | 0.00403 | 0.0177 |
| cobalt_ | 27.0 | 118.3 |
| cumene | 0.01 | 0.04 |

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| | | |
|---------------------------|--------|-------|
| dimethylphthalate | 0.01 | 0.01 |
| ethyl acrylate | 0.13 | 0.58 |
| ethylbenzene | 0.01 | 0.05 |
| ethylene dibromide | 0.01 | 0.02 |
| hexachlorobenzene | 0.01 | 0.01 |
| hexachlorobutadiene | 0.01 | 0.03 |
| hexachlorocyclopentadiene | 0.01 | 0.02 |
| hexachloroethane | 0.01 | 0.02 |
| hydrogen chloride | 15.5 | 67.9 |
| hydroquinone | 0.02 | 0.07 |
| iodomethane | 0.01 | 0.03 |
| lead | .10 | .438 |
| m/p xylene | 0.43 | 1.89 |
| manganese | 0.0602 | 0.264 |
| mercury | 0.0759 | 0.332 |
| methyl methacrylate | 0.01 | 0.05 |
| methylene chloride | 0.24 | 1.03 |
| naphthalene | 0.38 | 1.68 |
| n-hexane | 0.07 | 0.33 |
| nickel_ | 27.0 | 118.3 |
| nitrobenzene | 0.02 | 0.07 |
| N-nitrosodiphenylamine | 0.01 | 0.01 |
| N-nitrosomorpholine | 0.01 | 0.05 |
| ortho-anisidine | 0.01 | 0.03 |
| ortho-toluidine | 0.01 | 0.01 |
| o-xylene | 0.2 | 0.86 |
| pentachlorophenol | 0.01 | 0.01 |
| phenol | 0.09 | 0.38 |
| selenium | 0.0105 | 0.046 |
| styrene | 0.01 | 0.02 |
| tert-butyl methyl ether | 0.01 | 0.01 |
| tetrachloroethene | 0.01 | 0.02 |
| toluene | 0.01 | 0.04 |
| trans-1,3-dichloropropene | 0.01 | 0.02 |
| trichloroethene | 0.01 | 0.03 |
| vinyl acetate | 0.01 | 0.02 |
| vinyl bromide | 0.11 | 0.49 |
| vinyl chloride | 0.01 | 0.01 |

‡ While it is assumed that these metals are indeed emitted, as they are naturally occurring metals present in the raw materials used to manufacture cement, Ash Grove was not able to calculate an emission rate. Ash Grove requests the use of the particulate matter emission rate of 19.5 lb/hr and 85.41 tpy for Kiln 1 and 2, 27.0 lb/hr and 118.3 tpy for Kiln 3, as stated in the HWC NESHAP (September 29, 1999, 64 FR 52879) preamble be incorporated as limits for nickel and cobalt.

26. Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain continuous emission monitors (CEMs) to record SO₂, CO, and NO_x emissions at this source. These

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CEMs shall be operated in accordance with all applicable conditions of the Department's Continuous Emission Monitoring Systems Conditions as found in Appendix A of this permit.

27. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR Part 70.6, the permittee shall operate the electrostatic precipitators used to control particulate emissions at this source at a minimum kVA of electrical power input to the electrostatic precipitator. This minimum kVA rating shall be the sum of the kVA levels for the individual field of the ESP and shall be the level determined by the most recent passing stack test performed. Ash Grove shall notify the Department, in writing, when the kVA level is changed. This notification shall include a copy of the test results and the new value for the rating. Compliance shall be demonstrated through compliance with Specific Condition #32.
28. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR Part 70.6, the permittee shall not produce more than 52,080 tons of clinker per month at this source. Compliance shall be demonstrated through compliance with the record keeping requirements set forth in Specific Condition #30.
29. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311 and 40 CFR Part 70.6, the permittee shall not exceed the feed rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #31.

| Fuel | Monthly Amount |
|-------------------|-------------------------|
| Natural Gas | 412.2 MMft ³ |
| Coal | 18,600 tons |
| Tire-derived Fuel | 2,231 ton |
| LWDF | 11,160 ton |
| SWDF | 3,720 ton |

LWDF = Liquid Waste-derived Fuel

SWDF = Solid Waste-derived Fuel

30. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of clinker produced at this source. These records shall be kept on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. A rolling twelve month total of these amounts shall be kept on

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site and be made available to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.

31. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain records of the types and amounts of fuel used at this source. These records shall be kept on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. A rolling twelve month total of these amounts shall be kept on site and be made available to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.
32. **Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall record the sum of the electrical power input in kilovolt-amperes (kVA) to each field of the electrostatic precipitator used to control particulate emissions from this source. A reading of the electrical power input to each field of the electrostatic precipitator shall be taken a minimum of once per day of operation. These records shall be kept on site and made available to Department personnel upon request.**
33. **Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, 40 CFR Part 63.1209(a)(1), and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 20% opacity. No later than September 30, 2002, compliance shall be demonstrated with a continuous opacity monitor. Until installation and certification of the continuous opacity monitor occurs, the permittee shall continue to demonstrate compliance through compliance with Plantwide Condition #9.**

Transfer points for Pyroprocessing Unit

Source Description

These are various transfer points associated with the pyroprocessing unit. Emissions from these points are considered uncontrolled and were calculated based on equipment maximum capacity using the formula contained in AP-42 §13.2.4-3 as found in Appendix B.

Specific Conditions

34. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance is based on the maximum capacity of the equipment and continuous operation.

| Source | Source Name | Pollutant | lb/hr | tpy |
|--------|--|------------------|-------|-----|
| P4 | Discharge into Coal Mill #1 | PM ₁₀ | 0.1 | 0.1 |
| P5* | Discharge from Kiln #1 to #1 Bucket Conveyor | PM ₁₀ | 0.2 | 0.3 |
| P7 | Discharge into Coal Mill #2 | PM ₁₀ | 0.1 | 0.1 |
| P8* | Discharge from Kiln #2 to #2 Bucket Conveyor | PM ₁₀ | 0.1 | 0.3 |
| P9 | Discharge into Coal Mill #3 | PM ₁₀ | 0.1 | 0.1 |
| P10* | Discharge from Kiln #3 to #3 Bucket Conveyor | PM ₁₀ | 0.2 | 0.8 |
| P11* | Discharge from Bin #48 | PM ₁₀ | 0.1 | 0.1 |
| P12* | Discharge from Bin #48 | PM ₁₀ | 0.1 | 0.1 |
| P13* | Discharge from Bin #47 | PM ₁₀ | 0.1 | 0.1 |
| P15* | Baghouse Discharge to #2 Bucket Conveyor | PM ₁₀ | 0.2 | 0.6 |
| P16* | Baghouse Discharge to #3 Bucket Conveyor | PM ₁₀ | 0.2 | 0.6 |
| P20* | Truck Loading of CKD | PM ₁₀ | 0.1 | 0.1 |
| P21 | Truck Unloading of CKD | PM ₁₀ | 0.1 | 0.1 |
| P22 | Trailer Unloading of CKD | PM ₁₀ | 0.1 | 0.1 |
| P24 | Transfer from | PM ₁₀ | 0.1 | 0.2 |

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| | | | | |
|------|---|------------------|-----|-----|
| | Main Coal Pile | | | |
| P26* | Drag Conveyor Transfer Point Kiln #1 | PM ₁₀ | 0.1 | 0.1 |
| P27* | Drag Conveyor Transfer Point Kiln #1 | PM ₁₀ | 0.1 | 0.1 |
| P28* | Drag Conveyor Transfer Point Kiln #2 | PM ₁₀ | 0.1 | 0.1 |
| P29* | Drag Conveyor Transfer Point Kiln #2 | PM ₁₀ | 0.1 | 0.1 |
| P30* | Drag Conveyor Transfer Point Kiln #3 | PM ₁₀ | 0.1 | 0.2 |
| P31* | Drag Conveyor Transfer Point Kiln #3 | PM ₁₀ | 0.1 | 0.2 |
| P32* | 1500 Ton CKD Storage Bin | PM ₁₀ | 0.5 | 1.9 |
| P33* | CKD Handling Screw Conveyor Bin Vent | PM ₁₀ | 0.1 | 0.2 |
| P34* | Kiln #3 Dust Scoop Bin Vent | PM ₁₀ | 0.2 | 0.6 |
| P35* | CKD Handling 500 Ton Silo Baghouse | PM ₁₀ | 0.3 | 1.2 |
| P36* | Truck Loading of CKD (North of Hwy. 108) | PM ₁₀ | 0.1 | 0.1 |

*Subject to 40 CFR 63, Subpart LLL

35. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance is based on the maximum capacity of the equipment and continuous operation.

| Source | Source Name | Pollutant | lb/hr | tpy |
|--------|---|-----------|-------|-----|
| P4 | Discharge into Coal Mill #1 | PM | 0.1 | 0.2 |
| P5* | Discharge from Kiln #1 to #1 Bucket Conveyor | PM | 0.2 | 0.8 |
| P7 | Discharge into Coal Mill #2 | PM | 0.1 | 0.1 |
| P8* | Discharge from Kiln #2 to #2 Bucket Conveyor | PM | 0.2 | 0.8 |
| | | | | |

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| | | | | |
|------|---|----|-----|-----|
| P9 | Discharge into Coal Mill #3 | PM | 0.1 | 0.1 |
| P10* | Discharge from Kiln #3 to #3 Bucket Conveyor | PM | 0.6 | 2.3 |
| P11* | Discharge from Bin #48 | PM | 0.1 | 0.1 |
| P12* | Discharge from Bin #48 | PM | 0.1 | 0.1 |
| P13* | Discharge from Bin #47 | PM | 0.1 | 0.1 |
| P15* | Baghouse Discharge to #2 Bucket Conveyor | PM | 0.4 | 1.6 |
| P16* | Baghouse Discharge to #3 Bucket Conveyor | PM | 0.4 | 1.6 |
| P20* | Truck Loading of CKD | PM | 0.1 | 0.2 |
| P21 | Truck Unloading of CKD | PM | 0.1 | 0.2 |
| P22 | Trailer Unloading of CKD | PM | 0.1 | 0.2 |
| P24 | Transfer from Main Coal Pile | PM | 0.2 | 0.6 |
| P26* | Drag Conveyor Transfer Point Kiln #1 | PM | 0.1 | 0.3 |
| P27* | Drag Conveyor Transfer Point Kiln #1 | PM | 0.1 | 0.3 |
| P28* | Drag Conveyor Transfer Point Kiln #2 | PM | 0.1 | 0.3 |
| P29* | Drag Conveyor Transfer Point Kiln #2 | PM | 0.1 | 0.3 |
| P30* | Drag Conveyor Transfer Point Kiln #3 | PM | 0.1 | 0.4 |
| P31* | Drag Conveyor Transfer Point Kiln #3 | PM | 0.1 | 0.4 |
| P32* | 1500 Ton CKD Storage Bin | PM | 0.5 | 1.9 |
| P33* | CKD Handling Screw Conveyor Bin Vent | PM | 0.1 | 0.2 |
| P34* | Kiln #3 Dust Scoop Bin Vent | PM | 0.2 | 0.6 |
| P35* | CKD Handling 500 Ton Silo Baghouse | PM | 0.3 | 1.2 |
| P36* | Truck Loading of CKD | PM | 0.1 | |

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| | | | | |
|--|---------------------|--|--|-----|
| | (North of Hwy. 108) | | | 0.3 |
|--|---------------------|--|--|-----|

*Subject to 40 CFR 63, Subpart LLL

36. Pursuant to §18.501 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, emissions from these sources shall not exceed 10% opacity. These sources are subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through compliance with Plantwide Condition # 14.
37. Pursuant to §18.901 of Regulation 18, SN-P21 and SN-P22 shall be operated so that unnecessary air contaminants do not become airborne. Compliance shall be demonstrated through a monthly visual observation of operations at SN-P21 and SN-P22 and the recording of the findings of the visual observations in the facility record. These records shall be kept on site and made available to Department personnel upon request.
38. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests. A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.
39. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, visual emissions for SN-P4, P7, P9, and P24 shall not exceed 20 percent opacity. The permittee shall demonstrate compliance with this specific condition by conducting a visible opacity observation of the source at least once each calendar week in which the source operates, and keep a record of these observations. If visible emissions appear to exceed 20 percent opacity, the permittee shall take corrective action, and perform and record the observation again. If visible emissions still appear to exceed 20 percent opacity, the permittee shall conduct a six minute opacity reading in accordance with the EPA reference method No. 9. The records of visible emission observations and results of any method No. 9 reading shall be kept on site for five years and made available to Department personnel upon request.

SN-P6
3 Clinker Coolers Baghouse

Source Description

This baghouse controls particulate emissions from the clinker coolers. Efficiency is assumed to be 99%.

Specific Conditions

40. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #42.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM ₁₀ | 25.0 | 110.0 |

41. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #42

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM | 25.0 | 110.0 |

42. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the control equipment associated with this source in a manner consistent with good air pollution control practices in order to comply with the applicable emission limits.
43. Pursuant to 40 CFR 63.1345, §19.503 of Regulation 19 and 40 CFR 52, Subpart E, emissions from this clinker cooler shall not contain particulate matter in excess of 0.050 kg per Mg (0.1 lb per ton) of feed (dry basis) to the kiln and visible emissions from this source shall not exceed 10% opacity. Pursuant to 40 CFR 63.1350(d)(1), compliance shall be demonstrated with a continuous opacity monitor.
44. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not

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be tested again, provided that the facility has documentation and the results of these tests.

A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-P17
Bin #49 Sock Filter

Source Description

This filter controls particulate emissions resulting from material transfer in and out of this bin. Efficiency is assumed to be 95%.

Specific Conditions

45. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #47.

| Pollutant | lb/hr | tpy |
|------------------|-------|-----|
| PM ₁₀ | 0.5 | 1.9 |

46. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #47

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| PM | 0.5 | 1.9 |

47. **Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the control equipment associated with this source in a manner consistent with good air pollution control practices in order to comply with the applicable emission limits.**
48. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, emissions from this source shall not exceed 10% opacity. This source is subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through compliance with Plantwide Condition #14.
49. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests.

A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-P18, P19
#1 and #2 CKD Baghouse

Source Description

These baghouses control particulate emissions at the storage bins containing cement kiln dust (CKD). Efficiencies are assumed to be 99%.

Specific Conditions

50. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #52.

| SN | Pollutant | lb/hr | tpy |
|-----|------------------|-------|-----|
| P18 | PM ₁₀ | 0.2 | 0.7 |
| P19 | PM ₁₀ | 0.2 | 0.7 |

51. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #52.

| SN | Pollutant | lb/hr | tpy |
|-----|-----------|-------|-----|
| P18 | PM | 0.2 | 0.7 |
| P19 | PM | 0.2 | 0.7 |

52. **Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the control equipment associated with this source in a manner consistent with good air pollution control practices in order to comply with the applicable emission limits.**
53. Pursuant to §18.501 Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, emissions from these sources shall not exceed 10% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #9.
54. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously

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performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests.

A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-P23
CKD Pile

Source Description

This storage pile has a total area of 60 acres. Emissions from the cement kiln dust pile are controlled by surface watering.

Specific Conditions

55. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #57.

| Pollutant | lb/hr | tpy |
|------------------|-------|-----|
| PM ₁₀ | 0.6 | 2.6 |

56. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #57.

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| PM | 1.2 | 5.2 |

57. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 70.6 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the area of this storage pile at or below 60 acres. Compliance shall be demonstrated through compliance with Specific Condition #58.
58. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR 52, Subpart E and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and until such time as the terms of the August 2001 Consent Administrative Order have been fully satisfied, the permittee shall obtain an aerial photograph of the cement kiln dust storage pile once per calendar year to demonstrate that the footprint of the cement kiln dust storage pile has remained unchanged from the effective date of this operating air permit.
59. Pursuant to §18.901 of Regulation 18, this source shall be operated so that unnecessary air contaminants do not become airborne. Compliance shall be demonstrated through a monthly visual observation of operations at this source in accordance with EPA Method 22. The permittee shall maintain records of the observations performed. These records

shall be maintained on site and made available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.

Uncontrolled Transfer points in the Mill Area

Source Description

The Mill area consists of many different pieces of equipment. The uncontrolled emission rates were found based on equipment maximums using a formula contained in AP-42 page 13.2.4-3 as found in Appendix B.

Specific Conditions

60. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance is based on the maximum capacity of the equipment and continuous operation.

| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|---------------------------------------|------------------|--------------|------------|
| M1 | Loading Reclaim Elevator | PM ₁₀ | 0.5 | 1.8 |
| M3 | Gypsum Discharge into Finish Mill #4 | PM ₁₀ | 0.1 | 0.1 |
| M4 | Gypsum Discharge to Gypsum Elevator | PM ₁₀ | 0.1 | 0.1 |
| M8 | Discharge of B Belt to Finish Mill #2 | PM ₁₀ | 0.2 | 0.7 |
| M9 | Tripper Discharge into Bins | PM ₁₀ | 0.1 | 0.1 |
| M10 | Discharge from Bin #45 | PM ₁₀ | 0.1 | 0.1 |
| M11 | Discharge into Bin #43 | PM ₁₀ | 0.1 | 0.4 |
| M12 | Discharge from Bin #44 | PM ₁₀ | 0.1 | 0.2 |
| M13 | Discharge from Bin #43 | PM ₁₀ | 0.1 | 0.4 |
| M14 | Transfer to B Belt | PM ₁₀ | 0.1 | 0.4 |
| M15 | Transfer to B Belt | PM ₁₀ | 0.1 | 0.1 |
| M21 | Discharge from Bin #42 | PM ₁₀ | 0.1 | 0.1 |
| M22 | Discharge from Bin #41 | PM ₁₀ | 0.1 | 0.1 |
| M23 | Transfer from Bin #41 | PM ₁₀ | 0.1 | 0.1 |
| M24 | Discharge from Bin #40 | PM ₁₀ | 0.1 | 0.1 |

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| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|--|------------------|--------------|------------|
| M25 | Discharge from D Belt into Chalk Dryer | PM ₁₀ | 0.1 | 0.2 |
| M26 | Transfer to D Belt | PM ₁₀ | 0.1 | 0.1 |
| M27 | Discharge from Bin #39 | PM ₁₀ | 0.1 | 0.2 |
| M28 | Transfer to Dry Feed Belt | PM ₁₀ | 0.1 | 0.2 |
| M29 | Transfer to Dry Feed Belt | PM ₁₀ | 0.1 | 0.1 |
| M30 | Transfer from #1 Clinker Bin to Dry Feed Belt | PM ₁₀ | 0.2 | 0.6 |
| M31 | Discharge from Bin #38 | PM ₁₀ | 0.1 | 0.1 |
| M32 | Discharge from Bin #38 | PM ₁₀ | 0.1 | 0.1 |
| M33 | Discharge from Bin #37 | PM ₁₀ | 0.1 | 0.1 |
| M34 | Transfer to A1 Belt | PM ₁₀ | 0.1 | 0.1 |
| M35 | Discharge from Bin #36 | PM ₁₀ | 0.1 | 0.1 |
| M36 | Transfer to A1 Belt | PM ₁₀ | 0.1 | 0.1 |
| M37 | Transfer to A1 Belt | PM ₁₀ | 0.1 | 0.1 |
| M38 | Transfer to A1 Belt | PM ₁₀ | 0.1 | 0.1 |
| M39 | Discharge Into Raw Mill #3 | PM ₁₀ | 0.1 | 0.2 |
| M40 | Discharge from Gypsum Elevator into Feed Mill #4 | PM ₁₀ | 0.1 | 0.1 |

61. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance is based on the maximum capacity of the equipment and continuous operation.

| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|---------------------------------------|------------------|--------------|------------|
| M1 | Loading Reclaim Elevator | PM | 1.2 | 5.2 |
| M3 | Gypsum Discharge into Finish Mill #4 | PM | 0.1 | 0.1 |
| M4 | Gypsum Discharge to Gypsum Elevator | PM | 0.1 | 0.1 |
| M8 | Discharge of B Belt to Finish Mill #2 | PM | 0.5 | 2.0 |

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| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|---|------------------|--------------|------------|
| M9 | Tripper Discharge into Bins | PM | 0.1 | 0.2 |
| M10 | Discharge from Bin #45 | PM | 0.1 | 0.1 |
| M11 | Discharge into Bin #43 | PM | 0.3 | 1.0 |
| M12 | Discharge from Bin #44 | PM | 0.1 | 0.4 |
| M13 | Discharge from Bin #43 | PM | 0.3 | 1.0 |
| M14 | Transfer to B Belt | PM | 0.3 | 1.0 |
| M15 | Transfer to B Belt | PM | 0.1 | 0.1 |
| M21 | Discharge from Bin #42 | PM | 0.1 | 0.1 |
| M22 | Discharge from Bin #41 | PM | 0.1 | 0.1 |
| M23 | Transfer from Bin #41 | PM | 0.1 | 0.1 |
| M24 | Discharge from Bin #40 | PM | 0.1 | 0.1 |
| M25 | Discharge from D Belt into Chalk Dryer | PM | 0.2 | 0.6 |
| M26 | Transfer to D Belt | PM | 0.1 | 0.1 |
| M27 | Discharge from Bin #39 | PM | 0.1 | 0.4 |
| M28 | Transfer to Dry Feed Belt | PM | 0.1 | 0.4 |
| M29 | Transfer to Dry Feed Belt | PM | 0.1 | 0.1 |
| M30 | Transfer from #1 Clinker Bin to Dry Feed Belt | PM | 0.4 | 1.6 |
| M31 | Discharge from Bin #38 | PM | 0.1 | 0.1 |
| M32 | Discharge from Bin #38 | PM | 0.1 | 0.1 |
| M33 | Discharge from Bin #37 | PM | 0.1 | 0.1 |
| M34 | Transfer to A1 Belt | PM | 0.1 | 0.1 |
| M35 | Discharge from Bin #36 | PM | 0.1 | 0.1 |
| M36 | Transfer to A1 Belt | PM | 0.1 | 0.1 |
| M37 | Transfer to A1 Belt | PM | 0.1 | 0.1 |
| M38 | Transfer to A1 Belt | PM | 0.1 | 0.1 |
| M39 | Discharge Into Raw Mill #3 | PM | 0.2 | 0.5 |
| M40 | Discharge from Gypsum Elevator | PM | 0.1 | 0.1 |

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| SN | Source Name | Pollutant | lb/hr | tpy |
|----|-------------------|-----------|-------|-----|
| | into Feed Mill #4 | | | |

62. Pursuant to §18.501 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, emissions from these sources shall not exceed 10% opacity. These sources are subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through compliance with Plantwide Condition # 14.
63. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests. A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-M16
#2 Finish Mill Baghouse

Source Description

This baghouse controls emission from the finish mill. Emissions are estimated to be 0.01 grains/ft³. Efficiency is assumed to be 99%.

Specific Conditions

64. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #66.

| Pollutant | lb/hr | tpy |
|------------------|-------|-----|
| PM ₁₀ | 0.7 | 3.0 |

65. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #66.

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| PM | 0.7 | 3.0 |

66. **Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the control equipment associated with this source in a manner consistent with good air pollution control practices in order to comply with the applicable emission limits.**
67. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, emissions from this source shall not exceed 10% opacity. This source is subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through **daily visible emissions observations using Method 22, corrective action and subsequent visible emissions observations in accordance with 40 CFR 63.1350(e)**. The visible observation requirement will be superceded if the permittee chooses the use of a continuous opacity monitor or bag leak detection system in place of the visible observations in accordance with 40 CFR 63.1350(m). The permittee shall notify the Department, in writing, of the date a COM or BLDS is put into service at this facility.

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68. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests. A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-M17
#2 Finish Mill Discharge Baghouse

Source Description

After milling, the cement is discharged. Grinding aids containing HAPs and VOC are used in these mills. Particulate emissions from this discharge are controlled by a baghouse with an assumed efficiency of 99%.

Specific Conditions

69. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #71.

| Pollutant | lb/hr | tpy |
|------------------|-------|------|
| PM ₁₀ | 0.5 | 2.0 |
| VOC | 3.8 | 16.3 |

70. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-3-311, the permittee shall not exceed the emission limit set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #71 and Specific Condition #82.

| Pollutant | lb/hr | tpy |
|-----------------|-------|-----|
| PM | 0.5 | 2.0 |
| Diethanolamine | 0.2 | 0.6 |
| Ethylene Glycol | 0.1 | 0.2 |

71. **Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the control equipment associated with this source in a manner consistent with good air pollution control practices in order to comply with the applicable emission limits.**
72. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, emissions from this source shall not exceed 10% opacity. This

source is subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through **daily visible emissions observations using Method 22, corrective action and subsequent visible emissions observations in accordance with 40 CFR 63.1350(e)**. The visible observation requirement will be superceded if the permittee chooses the use of a continuous opacity monitor or bag leak detection system in place of the visible observations in accordance with 40 CFR 63.1350(m). The permittee shall notify the Department, in writing, of the date a COM or BLDS is put into service at this facility.

73. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests. A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-M18
#4 Finish Mill Baghouse

Source Description

After milling, the cement is discharged. Emissions from this discharge are controlled by a baghouse with an assumed efficiency of 99%.

Specific Conditions

74. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #76.

| Pollutant | lb/hr | tpy |
|------------------|-------|-----|
| PM ₁₀ | 1.1 | 4.7 |

75. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #76.

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| PM | 1.1 | 4.7 |

76. **Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the control equipment associated with this source in a manner consistent with good air pollution control practices in order to comply with the applicable emission limits.**
77. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, emissions from this source shall not exceed 10% opacity. This source is subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through **daily visible emissions observations using Method 22, corrective action and subsequent visible emissions observations in accordance with 40 CFR 63.1350(e)**. The visible observation requirement will be superseded if the permittee chooses the use of a continuous opacity monitor or bag leak detection system in place of the visible observations in accordance with 40 CFR 63.1350(m). The permittee shall notify the Department, in writing, of the date a COM or BLDS is put into service at this facility.

78. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests. A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-M19
#4 Finish Mill Discharge Baghouse

Source Description

After milling, the cement is discharged. Grinding aids containing HAPs and VOC are used in these mills. Particulate emissions from this discharge are controlled by a baghouse with an assumed efficiency of 99%.

Specific Conditions

79. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #81.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM ₁₀ | 1.6 | 6.7 |
| VOC | 27.8 | 122.0 |

80. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission limit set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #81 and Specific Condition #82.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM | 1.6 | 6.7 |
| Diethanolamine | 1.0 | 4.1 |
| Ethylene Glycol | 0.4 | 1.4 |

81. **Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the control equipment associated with this source in a manner consistent with good air pollution control practices in order to comply with the applicable emission limits.**
82. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, **A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311**, and 40 CFR Part 70.6, the grinding aid used at this facility shall have a density less than or equal to 9.996 lb/gal and shall not contain

more than 90% VOC or 4.0% HAP by weight. The HAPs contained in the grinding aid shall have a TLV greater than or equal to 2 mg/m³. The permittee shall not use more than 196,910 lb of grinding aid per month. Compliance shall be demonstrated through compliance with Specific Condition #83.

83. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 52, Subpart E, and A.C.A. **§8-4-203 as referenced by §8-4-304 and §8-4-311**, the permittee shall maintain records of the density, VOC content and HAP content of the grinding aid used. These records shall be in the form of an MSDS or the equivalent and shall be updated as necessary. The permittee shall maintain records of the amount of grinding aid used on a monthly basis. These records shall be updated on a monthly basis and made available to Department personnel upon request.
84. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, emissions from this source shall not exceed 10% opacity. This source is subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through **daily visible emissions observations using Method 22, corrective action and subsequent visible emissions observations in accordance with 40 CFR 63.1350(e)**. The visible observation requirement will be superseded if the permittee chooses the use of a continuous opacity monitor or bag leak detection system in place of the visible observations in accordance with 40 CFR 63.1350(m). The permittee shall notify the Department, in writing, of the date a COM or BLDS is put into service at this facility.
85. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests. A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-M20
Dryer Scrubber

Source Description

Emissions from the dryer consist of products of combustion and additional particulate matter. Particulate matter is controlled using a wet scrubber with an efficiency of 95%. This scrubber operates at a gas flow of 18,000 ft³/min and a liquid flow rate of 10 gal/min.

Specific Conditions

86. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #89.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM ₁₀ | 0.2 | 0.9 |
| SO ₂ | 0.1 | 0.2 |
| VOC | 0.5 | 1.9 |
| CO | 6.3 | 27.6 |
| NO _x | 7.5 | 32.9 |

87. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #89.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM | 0.4 | 1.8 |

88. Pursuant to §19.304 of Regulation 19 and 40 CFR 63.1348, emissions from this source shall not exceed 10% opacity. This source is subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated by observations of opacity from SN-M20 at least once each calendar week in which the dryer is in operation. These observations shall be performed using EPA Reference Method 22. Records of the operating periods of the dryer and the opacity observations shall be maintained in the facility record. These records shall be kept on site and made available to Department personnel upon request.

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89. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not use more than 55.8 MMft³ of natural gas per month at this source. Compliance shall be demonstrated through compliance with the requirements set forth in Specific Condition #90.
90. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of natural gas used at this source. These records shall be maintained on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. The records shall be maintained on site and made available to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.
91. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests. A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-M42, M43, M44, M45
Bin Dust Collectors

Source Description

These baghouses are used to control emissions resulting from material transfer to storage bins. The efficiency of each baghouse is assumed to be 99%.

Specific Conditions

92. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #94.

| SN | Pollutant | lb/hr | tpy |
|-----|------------------|-------|-----|
| M42 | PM ₁₀ | 0.3 | 0.9 |
| M43 | PM ₁₀ | 0.3 | 0.9 |
| M44 | PM ₁₀ | 0.3 | 0.9 |
| M45 | PM ₁₀ | 0.3 | 0.9 |

93. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #94.

| SN | Pollutant | lb/hr | tpy |
|-----|-----------|-------|-----|
| M42 | PM | 0.3 | 0.9 |
| M43 | PM | 0.3 | 0.9 |
| M44 | PM | 0.3 | 0.9 |
| M45 | PM | 0.3 | 0.9 |

94. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the control equipment associated with these sources in a manner consistent with good air pollution control practices in order to comply with the applicable emission limits.

95. Pursuant to §18.501 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and

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§8-4-311, §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, emissions from these sources shall not exceed 10% opacity. These sources are subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through compliance with Plantwide Condition #14.

96. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests. A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-F4
Long Term Coal Pile

Source Description

Coal is stored in this pile until it is moved to the active coal pile and fed to the kilns.

Specific Conditions

97. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #99.

| Pollutant | lb/hr | tpy |
|------------------|-------|-----|
| PM ₁₀ | 0.1 | 0.5 |

98. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #99.

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| PM | 0.2 | 0.9 |

99. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 70.6 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the area of this storage pile at or below 3.0 acres. Compliance shall be demonstrated through compliance with Specific Condition #100.
100. **Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR 52, Subpart E and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and within thirty days of the effective date of this operating air permit, the permittee shall survey a boundary perimeter to the long term coal pile that encompasses an area no greater than 3.0 acres. The permittee shall demarcate the perimeter on the ground by stakes, monuments or other permanent markers. At a minimum of once every three months, the permittee shall certify in the facility record that the footprint of the pile is within the confines of the established perimeter. If the footprint of the pile exceeds the established perimeter at any location, the permittee shall survey the pile to ascertain the true area of the pile and make appropriate notations in the facility record. These records shall be kept on site and made available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.**

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101. Pursuant to §18.901 of Regulation 18, this source shall be operated so that unnecessary air contaminants do not become airborne. Compliance shall be demonstrated through a monthly visual observation of operations at this source in accordance with EPA Method 22. The permittee shall maintain records of the observations performed. These records shall be maintained on site and made available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.

SN-F5
Active Coal Pile

Source Description

This is where the coal from the long term pile is transferred. Coal is fed to the kilns from this pile.

Specific Conditions

102. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #104.

| Pollutant | lb/hr | tpy |
|------------------|-------|-----|
| PM ₁₀ | 0.1 | 0.3 |

103. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #104.

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| PM | 0.2 | 0.6 |

104. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 70.6 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the area of this storage pile at or below 1.0 acre. Compliance shall be demonstrated through compliance with Specific Condition #105.
105. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR 52, Subpart E and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and within thirty days of the effective date of this operating air permit, the permittee shall survey a boundary perimeter to the active coal pile that encompasses an area no greater than 1.0 acre. The permittee shall demarcate the perimeter on the ground by stakes, monuments or other permanent markers. At a minimum of once every three months, the permittee shall certify in the facility record that the footprint of the pile is within the confines of the established perimeter. If the footprint of the pile exceeds the established perimeter at any location, the permittee shall survey the pile to ascertain the true area of the pile and make appropriate notations in the facility record. These records shall be kept on site and made available to Department personnel upon request. A copy of these records shall be submitted in

accordance with General Provision #7.

106. Pursuant to §18.901 of Regulation 18, this source shall be operated so that unnecessary air contaminants do not become airborne. Compliance shall be demonstrated through a monthly visual observation of operations at this source in accordance with EPA Method 22. The permittee shall maintain records of the observations performed. These records shall be maintained on site and made available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.

Uncontrolled Emission Points in the Fuel Area

Source Description

The Fuel area consists of many different pieces of equipment. The uncontrolled emission rates were found based on equipment maximums using a formula contained in AP-42 page 13.2.4-3 as found in Appendix B.

Specific Conditions

107. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance is based on the maximum capacity of the equipment and continuous operation.

| SN | Source Description | Pollutant | lb/hr | tpy |
|-----|--|------------------|-------|-----|
| F6 | Discharge into Feed Hopper #5 | PM ₁₀ | 0.3 | 0.6 |
| F8 | Coal Stacker Belt | PM ₁₀ | 0.1 | 0.1 |
| F9 | Discharge into Feed Hopper #4 | PM ₁₀ | 0.3 | 0.6 |
| F11 | Transfer to #206 Belt | PM ₁₀ | 0.1 | 0.1 |
| F12 | Transfer to #206 Belt | PM ₁₀ | 0.1 | 0.1 |
| F13 | Transfer to #208 Belt | PM ₁₀ | 0.1 | 0.1 |
| F14 | Transfer to Stacker Belt | PM ₁₀ | 0.3 | 0.6 |
| F15 | Unloading into Long Term Coal Pile | PM ₁₀ | 0.2 | 0.5 |
| F16 | Transfer from Long Term Coal Pile to Active Pile | PM ₁₀ | 0.2 | 0.5 |
| F17 | Coal Feeders | PM ₁₀ | 0.1 | 0.2 |
| F18 | Railcar Unloading into Coal Hoppers 4 and 5 | PM ₁₀ | 0.3 | 1.0 |

108. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following. Compliance is based on the maximum capacity of the equipment and continuous operation.

| SN | Source Description | Pollutant | lb/hr | tpy |
|----|-------------------------------|-----------|-------|-----|
| F6 | Discharge into Feed Hopper #5 | PM | 0.6 | 1.7 |

| SN | Source Description | Pollutant | lb/hr | tpy |
|-----|--|-----------|-------|-----|
| F8 | Coal Stacker Belt | PM | 0.1 | 0.1 |
| F9 | Discharge into Feed Hopper #4 | PM | 0.6 | 1.7 |
| F11 | Transfer to #206 Belt | PM | 0.1 | 0.1 |
| F12 | Transfer to #206 Belt | PM | 0.1 | 0.1 |
| F13 | Transfer to #208 Belt | PM | 0.1 | 0.1 |
| F14 | Transfer to Stacker Belt | PM | 0.6 | 1.7 |
| F15 | Unloading into Long Term Coal Pile | PM | 0.5 | 1.2 |
| F16 | Transfer from Long Term Coal Pile to Active Pile | PM | 0.5 | 1.2 |
| F17 | Coal Feeders | PM | 0.2 | 0.6 |
| F18 | Railcar Unloading into Coal Hoppers 4 and 5 | PM | 0.6 | 2.7 |

109. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, visual emissions for these sources shall not exceed 20 percent opacity. The permittee shall demonstrate compliance with this specific condition by conducting a visible opacity observation of the source at least once each calendar week in which the source operates, and keep a record of these observations. If visible emissions appear to exceed 20 percent opacity, the permittee shall take corrective action, and perform and record the observation again. If visible emissions still appear to exceed 20 percent opacity, the permittee shall conduct a six minute opacity reading in accordance with the EPA reference method No. 9. The records of visible emission observations and results of any method No. 9 reading shall be kept on site for five years and made available to Department personnel upon request.
110. Pursuant to §18.901 of Regulation 18, SN-F15 and SN-F16 shall be operated so that unnecessary air contaminants do not become airborne. Compliance shall be demonstrated through a monthly visual observation of operations at SN-F15 and SN-F16 and the recording of the findings of the visual observations in the facility record. These records shall be kept on site and made available to Department personnel upon request.

SN-F19, F20
Liquid Waste-derived Fuel Tanks

Source Description

LWDF is received in rail tank cars and in tank trucks and stored in above ground storage tanks before being transferred to the kilns. There are ten above ground storage tanks. To control VOC emissions, tanks are vented to a thermal oxidizer with a back up carbon adsorption system.

Specific Conditions

111. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #123.

| Pollutant | lb/hr | tpy |
|------------------|-------|-----|
| PM ₁₀ | 0.1 | 0.2 |
| SO ₂ | 0.1 | 0.2 |
| VOC | 16.9 | 3.0 |
| CO | 0.5 | 2.0 |
| NO _x | 0.6 | 2.4 |

112. Pursuant to §18.8 of Regulation 18 and A.C.A. §8-3-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #123.

| Pollutant | lb/hr | tpy |
|------------------------|-------|-----|
| PM | 0.1 | 0.2 |
| Xylene (mixed isomers) | 1.26 | 0.2 |
| Toluene | 0.7 | 0.2 |
| Methylene Chloride | 0.1 | 0.1 |
| Ethyl Benzene | 0.33 | 0.1 |
| Styrene | 0.20 | 0.1 |
| Tetrachloroethene | 0.1 | 0.1 |
| 1,1,2 trichloroethane | 0.1 | 0.1 |

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| Benzene | 0.1 | 0.1 |

113. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984*, §60.110b(a), this subpart applies to each storage vessel with a capacity greater than 40 cubic meters (m³) that is used to store volatile organic liquids (VOLs) for which construction, reconstruction, or modification is commenced after July 23, 1984.
114. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 60, §60.112b(a), each storage vessel with a design capacity greater than or equal to 151 m³ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 5.2 kPa, but less than 76.6 kPa or with a design capacity greater than or equal to 75 m³, but less than 151 m³ containing a VOL that, as stored, has a maximum true vapor pressure equal to or greater than 27.6 kPa, but less than 76.6 kPa, shall equip each storage vessel with the following:
- a. Pursuant to §60.112b(a)(3), these vessels shall be equipped with a closed vent system and control device meeting the following specifications:
 - i. The closed vent system shall be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background and visual inspections as determined in Part 60, Subpart VV, §60.485(b).
 - ii. The control device shall be designed and operated to reduce inlet VOC emissions by 95 percent or greater.
115. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 60, §60.113b(c), each source that is equipped with a closed vent system and control device (the thermal oxidizer at this facility) as required in §60.112b(a)(3) or (b)(2) (other than a flare) is exempt from §60.8 of the General Provisions and shall meet the following requirements.
- a. Submit for approval by the Administrator as an attachment to the notification required by §60.7(a)(1) or, if the facility is exempt from §60.7(a)(1), as an attachment to the notification required by §60.7(a)(2), an operating plan containing the information listed below.
 - i. Documentation demonstrating that the control device will achieve the required control efficiency during maximum loading conditions. This documentation is to include a description of the gas stream which enters the control device, including flow and VOC content under varying liquid level conditions (dynamic and static) and manufacturer's design specifications for the control device. If the control device or the closed

vent capture system receives vapors, gases, or liquids other than fuel types from sources that are not designated sources under this subpart, the efficiency demonstration is to include consideration of all vapors, gases, and liquids received by the closed vent capture system and control device. If an enclosed combustion device with a minimum residence time of 0.75 seconds and a minimum temperature of 816EC is used to meet the 95 percent requirement, documentation that those conditions will exist is sufficient to meet the requirements of this paragraph.

- ii. A description of the parameter or parameters to be monitored to insure that the control device will be operated in conformance with its design and an explanation of the criteria used for selection of that parameter (or parameters).
 - b. Operate the closed vent system and control device and monitor the parameters of the closed vent system and control device in accordance with paragraph (c)(1) of this section, unless the plan was modified by the Administrator during the review process. In this case, the modification applies.
116. Pursuant to §19.304 of Regulation 19 and 40 CFR 60, §60.115b, the permittee shall maintain records and furnish reports as required by paragraphs (a), (b), or (c) of this section depending upon the control equipment installed to meet the requirements of §60.112b. The owner or operator shall keep copies of all reports and records required by this section, except for the record required by (c)(1), for at least two years. The record required by (c)(1) will be kept for the life of the control equipment.
117. Pursuant to §19.304 of Regulation 19 and 40 CFR 60, §60.115b(c), after installing control equipment in accordance with §60.112b(a)(3) or (b)(1) (closed vent system and control device other than a flare), the permittee shall keep the following records.
- a. A copy of the operating plan.
 - b. A record of the measured values of the parameters monitored in accordance with §60.112b(c)(2).
118. Pursuant to §19.304 of Regulation 19 and 40 CFR 60, §60.116b(a), the permittee shall keep copies of all records required by this section, except for records required by paragraph (b) of this section, for at least 2 years. The record required by paragraph (b) of this section shall be kept for the life of the source.
119. Pursuant to §19.304 of Regulation 19 and 40 CFR 60, §60.116b(b), the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Each storage with a design capacity

less than 75 m³ is subject to no provision of this subpart other than those required by this paragraph.

120. Pursuant to §19.304 of Regulation 19 and 40 CFR 60, §60.116b(e), for vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based on the highest expected calendar month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based on the maximum local monthly average ambient temperature as reported by the National Weather Service.
121. Pursuant to §19.304 of Regulation 19 and 40 CFR 60, §60.116b(f), the owner or operator of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements.
 - a. Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in paragraph (e) of this section.
 - b. For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for controls as defined in §60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods:
 - i. ASTM Method D2879-83 (incorporated by reference-see §60.17); or
 - ii. ASTM Method D323-82 (incorporated by reference-see §60.17); or
 - iii. As measured by an appropriate method as approved by the Administrator.
122. Pursuant to §18.501 of Regulation 18 and A.C.A. §8-4-230 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 10% opacity. Compliance shall be demonstrated by using only natural gas as fuel in the thermal oxidizer.
123. Pursuant to §19.702 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall determine the destruction efficiency of the thermal oxidizing unit either using an appropriate test method or through the use of engineering calculations. If testing is used, the test shall be performed a minimum of once every five years. The initial test shall be performed no later than 180 days after the initial startup date. This test shall be performed with this unit operating at or above 90% of its design capacity. This unit shall achieve a VOC destruction rate of not less than 95%. If engineering calculations are used, the permittee shall maintain a complete design analysis of the unit which shall contain documentation necessary to demonstrate the performance of the unit.
124. Pursuant to §19.703 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203

as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the temperature in the combustion chamber of the thermal oxidizer at or above 1500EF. To demonstrate compliance, the permittee shall install, calibrate, and maintain a continuous temperature recorder on the catalytic oxidizer used to control emissions from these sources. These records shall be maintained on site and made available to Department personnel upon request.

125. **Pursuant to §19.703 of Regulation 19, 40 CFR 52, Subpart E and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, during operation of the dual carbon canister system as a replacement for thermal oxidizer at this source, the permittee shall use good engineering judgement and/or vendor recommendations to determine the frequency to observe the condition of the breakthrough indicators on the carbon canisters in the absorption train. Observation of the breakthrough indicators on the carbon canisters shall occur no less often than the conclusion of each operating shift in which working losses were directed through the carbon canister absorption train. If breakthrough is detected, the system shall be reconfigured and, as necessary, canisters shall be recharged. The permittee shall maintain a log of the observations of the breakthrough indicators and the recharging of the carbon canisters. These records shall be maintained on site and made available to Department personnel upon request.**

SN-S1, S3, S13
Truck Loadout Dust Collectors

Source Description

Trucks are loaded at these points. Emissions are controlled using baghouses assumed to be 99% efficient.

Specific Conditions

126. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #128.

| SN | Pollutant | lb/hr | tpy |
|-------------|------------------|-------|-----|
| S1, DC #31 | PM ₁₀ | 0.2 | 0.8 |
| S3, DC#49 | PM ₁₀ | 0.7 | 3.0 |
| S13, DC #28 | PM ₁₀ | 0.5 | 2.0 |

127. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #128.

| SN | Pollutant | lb/hr | tpy |
|-------------|-----------|-------|-----|
| S1, DC #31 | PM | 0.2 | 0.8 |
| S3, DC#49 | PM | 0.7 | 3.0 |
| S13, DC #28 | PM | 0.5 | 2.0 |

128. **Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the control equipment associated with these sources in a manner consistent with good air pollution control practices in order to comply with the applicable emission limits.**

129. Pursuant to §18.501 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National*

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Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry, emissions from these sources shall not exceed 10% opacity. These sources are subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through compliance with Plantwide Condition #14.

130. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests. A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-S4, S5, S6, S7, S8, S9, S10, S11, S12
Silo Dust Collectors

Source Description

These baghouses control particulate emissions resulting from material transfer in and out of silos. Efficiencies are assumed to be 99%.

Specific Conditions

131. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #133.

| SN | Pollutant | lb/hr | tpy |
|-------------|------------------|-------|-----|
| S4, DC #21 | PM ₁₀ | 0.5 | 2.1 |
| S5, DC #22 | PM ₁₀ | 0.2 | 0.7 |
| S6, DC #23 | PM ₁₀ | 0.6 | 2.5 |
| S7, DC #24 | PM ₁₀ | 0.7 | 3.0 |
| S8, DC #29 | PM ₁₀ | 0.2 | 0.8 |
| S9, DC #30 | PM ₁₀ | 0.2 | 0.7 |
| S10, DC #25 | PM ₁₀ | 0.4 | 1.6 |
| S11, DC #26 | PM ₁₀ | 0.7 | 3.0 |
| S12, DC #27 | PM ₁₀ | 0.6 | 2.5 |

132. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #133.

| SN | Pollutant | lb/hr | tpy |
|------------|-----------|-------|-----|
| S4, DC #21 | PM | 0.5 | 2.1 |
| S5, DC #22 | PM | 0.2 | 0.7 |

| SN | Pollutant | lb/hr | tpy |
|-------------|-----------|-------|-----|
| S6, DC #23 | PM | 0.6 | 2.5 |
| S7, DC #24 | PM | 0.7 | 3.0 |
| S8, DC #29 | PM | 0.2 | 0.8 |
| S9, DC #30 | PM | 0.2 | 0.7 |
| S10, DC #25 | PM | 0.4 | 1.6 |
| S11, DC #26 | PM | 0.7 | 3.0 |
| S12, DC #27 | PM | 0.6 | 2.5 |

133. Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the control equipment associated with these sources in a manner consistent with good air pollution control practices in order to comply with the applicable emission limits.
134. Pursuant to §18.501 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, emissions from these sources shall not exceed 10% opacity. These sources are subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through compliance with Plantwide Condition #14.
135. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests. A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-C1
Clinker Transfer Tower Baghouse

Source Description

This baghouse controls particulate emissions resulting from material transfer at this source. Efficiency is assumed to be 99%.

Specific Conditions

136. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #138.

| Pollutant | lb/hr | tpy |
|------------------|-------|-----|
| PM ₁₀ | 1.8 | 7.6 |

137. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #138.

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| PM | 1.8 | 7.6 |

138. **Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the control equipment associated with this source in a manner consistent with good air pollution control practices in order to comply with the applicable emission limits.**
139. Pursuant to §18.501 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, emissions from these sources shall not exceed 10% opacity. These sources are subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through compliance with Plantwide Condition #14.
140. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests

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for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests.

A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

Uncontrolled Emission Points in the Clinker Area

Source Description

The clinker area consists of many different pieces of equipment. The uncontrolled emission rates were found based on equipment maximums using a formula contained in AP-42 page 13.2.4-3 as found in Appendix B.

Specific Conditions

141. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance is based on the maximum capacity of the equipment and continuous operation.

| SN | Source Name | Pollutant | lb/hr | tpy |
|------|--|------------------|-------|------|
| C2 | Outside Clinker Belt Discharge | PM ₁₀ | 0.5 | 1.9 |
| C3 | Outside Clinker Reclaim Hopper Loading | PM ₁₀ | 0.2 | 0.8 |
| C4 | Discharge from Clinker Reclaim Hopper | PM ₁₀ | 0.029 | 0.13 |
| C5* | Clinker Railcar and Truck Hopper Loading | PM ₁₀ | 0.180 | 0.79 |
| C6 | Clinker Discharge to Railcar/Truck | PM ₁₀ | 0.1 | 0.3 |
| C7* | Transfer from Reclaim Belt to #7 Belt | PM ₁₀ | 0.060 | 0.26 |
| C8* | Transfer to #7 Belt | PM ₁₀ | 0.180 | 2.26 |
| C9* | Transfer from #7 Belt to #8 Belt | PM ₁₀ | 0.042 | 0.18 |
| C10* | Transfer from #8 Belt to #9 Belt | PM ₁₀ | 0.222 | 0.97 |
| C11* | Discharge from #2 Clinker Bin | PM ₁₀ | 0.282 | 1.24 |
| C15* | Discharge into #2 Clinker Bin | PM ₁₀ | 0.030 | 0.13 |
| C16* | Transfer from #9 Belt | PM ₁₀ | 0.282 | 1.24 |
| C17* | Discharge from #1 Clinker Bin | PM ₁₀ | 0.282 | 1.24 |
| C19* | Transfer to Belt Conveyor | PM ₁₀ | 0.030 | 0.13 |
| C20* | Discharge into #1 Clinker Bin | PM ₁₀ | 0.030 | 0.13 |

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| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|---------------------------------|------------------|--------------|------------|
| C21* | Transfer to 4A Belt | PM ₁₀ | 0.086 | 0.38 |
| C28* | Discharge into Clinker Elevator | PM ₁₀ | 0.055 | 0.24 |
| C36* | Discharge into Clinker Elevator | PM ₁₀ | 0.589 | 2.58 |

*Subject to 40 CFR 63, Subpart LLL

142. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance is based on the maximum capacity of the equipment and continuous operation.

| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|--|------------------|--------------|------------|
| C2 | Outside Clinker Belt Discharge | PM | 1.3 | 5.4 |
| C3 | Outside Clinker Reclaim Hopper Loading | PM | 0.6 | 2.3 |
| C4 | Outside Clinker Storage Pile | PM | 0.1 | 0.3 |
| C5* | Discharge from Clinker Reclaim Hopper | PM | 0.6 | 2.3 |
| C6 | Clinker Railcar and Truck Hopper Loading | PM | 0.2 | 0.8 |
| C7* | Clinker Discharge to Railcar/Truck | PM | 0.2 | 0.8 |
| C8* | Transfer from Reclaim Belt to #7 Belt | PM | 0.6 | 2.3 |
| C9* | Transfer to #7 Belt | PM | 0.2 | 0.6 |
| C10* | Transfer from #7 Belt to #8 Belt | PM | 0.7 | 2.8 |
| C11* | Transfer from #8 Belt to #9 Belt | PM | 0.9 | 3.6 |
| C15* | Discharge from #2 Clinker Bin | PM | 0.1 | 0.4 |
| C16* | Discharge into #2 Clinker Bin | PM | 0.9 | 3.6 |
| C17* | Transfer from #9 Belt | PM | 0.9 | 3.6 |
| C19* | Discharge from #1 Clinker Bin | PM | 0.1 | 0.4 |
| C20* | Transfer to Belt Conveyor | PM | 0.1 | 0.4 |

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| SN | Source Name | Pollutant | lb/hr | tpy |
|------|---------------------------------|-----------|-------|-----|
| C21* | Discharge into #1 Clinker Bin | PM | 0.1 | 0.4 |
| C28* | Transfer to 4A Belt | PM | 0.2 | 0.7 |
| C36* | Discharge into Clinker Elevator | PM | 1.7 | 7.4 |
| C37 | Discharge into Clinker Elevator | PM | 0.2 | 0.5 |

*Subject to 40 CFR 63, Subpart LLL

143. Pursuant to §18.501 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, emissions from these sources shall not exceed 10% opacity. These sources are subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through compliance with Plantwide Condition #14.
144. Pursuant to §18.901 of Regulation 18, SN-C2, SN-C3, SN-C6 and SN-C37 shall be operated so that unnecessary air contaminants do not become airborne. Compliance shall be demonstrated through a monthly visual observation of operations at SN-C2, SN-C3, SN-C6 and SN-C37 and the recording of the findings of the visual observations in the facility record. These records shall be kept on site and made available to Department personnel upon request.
145. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests. A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-C4
Outside Clinker Storage Pile

Source Description

Clinker is stored in this pile prior to being transported by conveyors to mill feed bins.

Specific Conditions

146. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #148.

| Pollutant | lb/hr | tpy |
|------------------|-------|------|
| PM ₁₀ | 0.029 | 0.13 |

147. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #148.

| Pollutant | lb/hr | tpy |
|-----------|-------|------|
| PM | 0.058 | 0.25 |

148. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 70.6 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the area of this storage pile at or below 2.0 acres. Compliance shall be demonstrated through compliance with Specific Condition #149.

149. **Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR 52, Subpart E and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and within thirty days of the effective date of this operating air permit, the permittee shall survey a boundary perimeter to the outside clinker storage pile that encompasses an area no greater than 2.0 acres. The permittee shall demarcate the perimeter on the ground by stakes, monuments or other permanent markers. At a minimum of once every three months, the permittee shall certify in the facility record that the footprint of the pile is within the confines of the established perimeter. If the footprint of the pile exceeds the established perimeter at any location, the permittee shall survey the pile to ascertain the true area of the pile and make appropriate notations in the facility record. These records shall be kept on site and made**

available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.

150. Pursuant to §18.901 of Regulation 18, this source shall be operated so that unnecessary air contaminants do not become airborne. Compliance shall be demonstrated through a monthly visual observation of operations at this source in accordance with EPA Method 22. The permittee shall maintain records of the observations performed. These records shall be maintained on site and made available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.

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SN-C13, C14, C18, C26, C27, C32, C33, C34, C35, C41, C42, C43, C44
Clinker Handling Dust Collectors

Source Description

These baghouses control particulate emissions resulting from material transfer in the clinker portion of this facility. Efficiencies are assumed to be 99%.

Specific Conditions

151. Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #153.

| SN | Source Name | Pollutant | lb/hr | tpy |
|------|--------------------------------------|------------------|-------|-----|
| C13* | #2 Clinker Bin Dust Collector | PM ₁₀ | 0.1 | 0.4 |
| C14* | B Belt Dust Collector | PM ₁₀ | 0.1 | 0.4 |
| C18* | Clinker Elevator Dust Collector | PM ₁₀ | 0.1 | 0.4 |
| C26* | West Clinker Silo Dust Collector | PM ₁₀ | 0.8 | 3.2 |
| C27* | 4A2 Belt Dust Collector | PM ₁₀ | 0.6 | 2.7 |
| C32* | East Clinker Silo Dust Collector | PM ₁₀ | 0.8 | 3.2 |
| C33* | 440 Belt Dust Collector | PM ₁₀ | 0.1 | 0.4 |
| C34* | West Clinker Tank Dust Collector | PM ₁₀ | 0.1 | 0.4 |
| C35* | East Clinker Tank Dust Collector | PM ₁₀ | 0.1 | 0.4 |
| C41* | Off-spec Bin and Ancillary Equipment | PM ₁₀ | 0.4 | 1.4 |

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| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|-----------------------------|------------------|--------------|------------|
| | Dust Collector | | | |
| C42* | Clinker Dome Dust Collector | PM ₁₀ | 0.6 | 1.9 |
| C43* | Reclaim Belt Dust Collector | PM ₁₀ | 0.2 | 0.5 |
| C44* | Off-Spec Bin Dust Collector | PM ₁₀ | 0.17 | 0.75 |

Subject to 40 CFR 63, Subpart LLL

152. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #153.

| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|----------------------------------|------------------|--------------|------------|
| C13* | #2 Clinker Bin Dust Collector | PM | 0.1 | 0.4 |
| C14* | B Belt Dust Collector | PM | 0.1 | 0.4 |
| C18* | Clinker Elevator Dust Collector | PM | 0.1 | 0.4 |
| C26* | West Clinker Silo Dust Collector | PM | 0.8 | 3.2 |
| C27* | 4A2 Belt Dust Collector | PM | 0.6 | 2.7 |
| C32* | East Clinker Silo Dust Collector | PM | 0.8 | 3.2 |
| C33* | 440 Belt Dust Collector | PM | 0.1 | 0.4 |
| C34* | West Clinker Tank Dust Collector | PM | 0.1 | 0.4 |
| C35* | East Clinker Tank | PM | 0.1 | 0.4 |

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| SN | Source Name | Pollutant | lb/hr | tpy |
|------|---|------------------|-------|------|
| | Dust Collector | | | |
| C41* | Off-spec Bin and Ancillary Equipment Dust Collector | PM ₁₀ | 0.4 | 1.4 |
| C42* | Clinker Dome Dust Collector | PM ₁₀ | 0.6 | 1.9 |
| C43* | Reclaim Belt Dust Collector | PM ₁₀ | 0.2 | 0.5 |
| C44* | Off-Spec Bin Dust Collector | PM | 0.17 | 0.75 |

*Subject to 40 CFR 63, Subpart LLL

153. **Pursuant to §19.303 of Regulation 19 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall operate the control equipment associated with these sources in a manner consistent with good air pollution control practices in order to comply with the applicable emission limits.**
154. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6, the permittee shall not operate sources SN-41, SN-42, and SN-43 more than 7,250 hours per year based on a rolling twelve month total. Compliance shall be demonstrated by maintaining records of the hours of operation of these sources. These records shall be maintained on a weekly basis and updated weekly. These records shall be maintained on site and made available to Department personnel upon request.
155. Pursuant to §18.501 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*, emissions from these sources shall not exceed 10% opacity. These sources are subject to all applicable requirements listed in Plantwide Condition #11. Compliance with the opacity standard shall be demonstrated through compliance with Plantwide Condition #14.
156. Pursuant to §63.1349(a) of 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for all affected sources for which an initial compliance test has not been previously performed. Any of the affected sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests.

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A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

Uncontrolled Emission Points in the Raw Material Storage Area

Source Description

The Raw Material Storage area consists of many different pieces of equipment. The uncontrolled emission rates were found based on equipment maximums using a formula contained in AP-42 page 13.2.4-3 as found in Appendix B.

Specific Conditions

157. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance is based on the maximum capacity of the equipment and continuous operation.

| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|---|------------------|--------------|------------|
| R1 | Truck Unloading for Sand/Iron Ore | PM ₁₀ | 0.7 | 2.8 |
| R3 | Discharge from Chalk Feeder | PM ₁₀ | 0.1 | 0.1 |
| R4 | Discharge from Gypsum Feeder | PM ₁₀ | 0.1 | 0.4 |
| R6 | Discharge from Sand/Iron-ore Feeder | PM ₁₀ | 0.1 | 0.1 |
| R8 | Sand/Iron Ore Storage Transfer | PM ₁₀ | 0.2 | 0.5 |
| R9 | Discharge from Emergency Feeder | PM ₁₀ | 0.1 | 0.4 |
| R10 | Discharge of Gypsum Belt | PM ₁₀ | 0.3 | 1.2 |
| R11 | Discharge into Secondary Crusher | PM ₁₀ | 0.1 | 0.1 |
| R13 | Secondary Crusher Discharge | PM ₁₀ | 0.1 | 0.1 |
| R14 | Transfer to #2 Belt | PM ₁₀ | 0.1 | 0.1 |
| R24 | Transfer from Portable Crusher to Main Conveyor | PM ₁₀ | 0.2 | 0.5 |

158. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance is based on the maximum capacity of the equipment and continuous operation.

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| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|---|------------------|--------------|------------|
| R1 | Truck Unloading for Sand/Iron Ore | PM | 1.9 | 8.0 |
| R3 | Discharge from Chalk Feeder | PM | 0.1 | 0.2 |
| R4 | Discharge from Gypsum Feeder | PM | 0.3 | 1.0 |
| R6 | Discharge from Sand/Iron-ore Feeder | PM | 0.1 | 0.1 |
| R8 | Sand/Iron Ore Storage Transfer | PM | 0.4 | 1.5 |
| R9 | Discharge from Emergency Feeder | PM | 0.3 | 1.0 |
| R10 | Discharge of Gypsum Belt | PM | 0.8 | 3.2 |
| R11 | Discharge into Secondary Crusher | PM | 0.1 | 0.2 |
| R13 | Secondary Crusher Discharge | PM | 0.1 | 0.2 |
| R14 | Transfer to #2 Belt | PM | 0.1 | 0.2 |
| R24 | Transfer from Portable Crusher to Main Conveyor | PM | 0.3 | 1.3 |

159. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the opacity from sources R3, R4, R11, R13, and R14 shall not exceed 40%. Compliance with the opacity standard shall be demonstrated through compliance with Plantwide Condition #9.
160. Pursuant to §19.503 of Regulation 19 and 40 CFR Part 52, Subpart E, the opacity from sources R6, R9, R10, and R24 shall not exceed 20%. Compliance with the opacity standard shall be demonstrated through compliance with Plantwide Condition #9.
161. Pursuant to §18.901 of Regulation 18, SN-R1 and SN-R8 shall be operated so that unnecessary air contaminants do not become airborne. Compliance shall be demonstrated through a monthly visual observation of operations at SN-R1 and SN-R8 and the recording of the findings of the visual observations in the facility record. These records shall be kept on site and made available to Department personnel upon request.

SN-R2
Chalk Storage Pile

Source Description

Chalk used to create the clinker at this facility is stored in a pile.

Specific Conditions

162. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #164.

| Pollutant | lb/hr | tpy |
|------------------|-------|-----|
| PM ₁₀ | 0.1 | 0.2 |

163. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #164.

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| PM | 0.1 | 0.3 |

164. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 70.6 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the area of this storage pile at or below 1.50 acres. Compliance shall be demonstrated through compliance with Specific Condition #165.
165. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR 52, Subpart E and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and within thirty days of the effective date of this operating air permit, the permittee shall survey a boundary perimeter to the sand storage pile that encompasses an area no greater than 1.50 acres. The permittee shall demarcate the perimeter on the ground by stakes, monuments or other permanent markers. At a minimum of once every three months, the permittee shall certify in the facility record that the footprint of the pile is within the confines of the established perimeter. If the footprint of the pile exceeds the established perimeter at any location, the permittee shall survey the pile to ascertain the true area of the pile and make appropriate notations in the facility record. These records shall be kept on site and made available to

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Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.

- 166. Pursuant to Section 18.901(A) of Regulation 18 and A.C.A § 8-4-230 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 20% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #9.**

SN-R5
Gypsum Storage Pile

Source Description

Gypsum used to create the clinker at this facility is stored in a pile.

Specific Conditions

167. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #169.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM ₁₀ | 0.1 | 0.1 |

168. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #169.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM | 0.1 | 0.1 |

169. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 70.6 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the area of this storage pile at or below 0.22 acre. Compliance shall be demonstrated through compliance with Specific Condition #169.
170. **Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR 52, Subpart E and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and within thirty days of the effective date of this operating air permit, the permittee shall survey a boundary perimeter to the gypsum storage pile that encompasses an area no greater than 0.22 acre. The permittee shall demarcate the perimeter on the ground by stakes, monuments or other permanent markers. At a minimum of once every three months, the permittee shall certify in the facility record that the footprint of the pile is within the confines of the established perimeter. If the footprint of the pile exceeds the established perimeter at any location, the permittee shall survey the pile to ascertain the true area of the pile and make appropriate notations in the facility record. These records shall be kept on site and made**

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available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.

- 171. Pursuant to Section 18.901(A) of Regulation 18 and A.C.A § 8-4-230 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 20% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #9.**

SN-R12
Secondary Crusher

Source Description

This crusher is used to crush the raw materials used at this facility. Chalk, sand, and iron ore are crushed and then transported to the mill building by a conveyor belt.

Specific Conditions

172. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #175.

| Pollutant | lb/hr | tpy |
|------------------|-------|-----|
| PM ₁₀ | 0.2 | 0.8 |

173. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #175.

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| PM | 0.2 | 0.8 |

174. **Pursuant to §19.503 of Regulation 19, §18.901 of Regulation 18 and, A.C.A § 8-4-230 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 20% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #9.**
175. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not crush more than 744,000 tons of material per month at this source. Compliance shall be demonstrated through compliance with Specific Condition #175.
176. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of material crushed at this source. These records shall be maintained on a weekly basis. These records shall be kept on site and made available to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.

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177. Pursuant to §19.503 of Regulation 19, §18.901 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall conduct initial compliance tests for this source provided an initial compliance test has not been previously performed. Any sources for which the facility has already tested need not be tested again, provided that the facility has documentation and the results of these tests. A copy of this documentation must accompany the results of the initial tests required by this Specific Condition.

SN-R17
Long Term Sand Pile

Source Description

Sand used to create the clinker at this facility is stored in a pile.

Specific Conditions

178. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #180.

| Pollutant | lb/hr | tpy |
|------------------|-------|-----|
| PM ₁₀ | 0.1 | 0.2 |

179. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #180.

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| PM | 0.1 | 0.4 |

180. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 70.6 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the area of this storage pile at or below 1.0 acre. Compliance shall be demonstrated through compliance with Specific Condition #180.
181. **Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR 52, Subpart E and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and within thirty days of the effective date of this operating air permit, the permittee shall survey a boundary perimeter to the long term sand storage pile that encompasses an area no greater than 1.0 acre. The permittee shall demarcate the perimeter on the ground by stakes, monuments or other permanent markers. At a minimum of once every three months, the permittee shall certify in the facility record that the footprint of the pile is within the confines of the established perimeter. If the footprint of the pile exceeds the established perimeter at any location, the permittee shall survey the pile to ascertain the true area of the pile and make appropriate notations in the facility record. These records shall be kept on site and made**

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available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.

- 182. Pursuant to Section 18.901(A) of Regulation 18 and A.C.A § 8-4-230 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 20% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #9.**

SN-R18
Iron Ore Storage Pile

Source Description

Iron ore used to create the clinker at this facility is stored in a pile.

Specific Conditions

183. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #185.

| Pollutant | lb/hr | tpy |
|------------------|-------|-----|
| PM ₁₀ | 0.1 | 0.3 |

184. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #185.

| Pollutant | lb/hr | tpy |
|-----------|-------|-----|
| PM | 0.2 | 0.6 |

185. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 70.6 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the area of this storage pile at or below 0.5 acre. Compliance shall be demonstrated through compliance with Specific Condition #185.
186. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR 52, Subpart E and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and within thirty days of the effective date of this operating air permit, the permittee shall survey a boundary perimeter to the iron ore storage pile that encompasses an area no greater than 0.5 acre. The permittee shall demarcate the perimeter on the ground by stakes, monuments or other permanent markers. At a minimum of once every three months, the permittee shall certify in the facility record that the footprint of the pile is within the confines of the established perimeter. If the footprint of the pile exceeds the established perimeter at any location, the permittee shall survey the pile to ascertain the true area of the pile and make appropriate notations in the facility record. These records shall be kept on site and made

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available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.

- 187. Pursuant to Section 18.901(A) of Regulation 18 and A.C.A § 8-4-230 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 20% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #9.**

SN-R19
Sand Storage Pile

Source Description

Sand used to create the clinker at this facility is stored in this pile after being moved from the long term storage pile until it is fed to the clinker.

Specific Conditions

188. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #190.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM ₁₀ | 0.1 | 0.1 |

189. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #190.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM | 0.1 | 0.1 |

190. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR Part 70.6 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall maintain the area of this storage pile at or below 0.25 acre. Compliance shall be demonstrated through compliance with Specific Condition #190.
191. **Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, 40 CFR 52, Subpart E and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and within thirty days of the effective date of this operating air permit, the permittee shall survey a boundary perimeter to the sand storage pile that encompasses an area no greater than 0.25 acre. The permittee shall demarcate the perimeter on the ground by stakes, monuments or other permanent markers. At a minimum of once every three months, the permittee shall certify in the facility record that the footprint of the pile is within the confines of the established perimeter. If the footprint of the pile exceeds the established perimeter at any location, the permittee shall survey the**

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pile to ascertain the true area of the pile and make appropriate notations in the facility record. These records shall be kept on site and made available to Department personnel upon request. A copy of these records shall be submitted in accordance with General Provision #7.

- 192. Pursuant to Section 18.901(A) of Regulation 18 and A.C.A § 8-4-230 as referenced by §8-4-304 and §8-4-311, visible emissions from this source shall not exceed 20% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #9.**

SN-R20

Fugitive Emissions from Plant Haul Roads

Source Description

Equipment and material are moved around the plant via a series of unpaved haul roads. Emissions from these roads were calculated using an equation contained in AP-42 §13.2.2 for unpaved roads.

Specific Conditions

193. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #195.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM ₁₀ | 3.3 | 12.0 |

194. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #195.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM | 13.1 | 47.2 |

195. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6, the permittee shall follow the plant haul road fugitive dust control plan contained in Appendix I of the permit.

SN-R22& R-23

Portable Crusher Diesel Engine and Portable Crusher

Source Description

This crusher is powered by a diesel engine and is used to crush spent kiln brick so that it may be added to the raw materials stored in the mill building, then fed to Kiln #3.

Specific Conditions

196. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #199.

| SN | Pollutant | lb/hr | tpy |
|------|------------------|-------|------|
| R-22 | PM ₁₀ | 0.2 | 0.8 |
| | SO ₂ | 0.2 | 0.8 |
| | VOC | 0.2 | 0.9 |
| | CO | 0.6 | 2.3 |
| | NO _x | 2.5 | 10.6 |
| R-23 | PM ₁₀ | 0.5 | 0.5 |

197. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #199.

| SN | Pollutant | lb/hr | tpy |
|------|-----------|-------|-----|
| R-22 | PM | 0.2 | 0.8 |
| R-23 | PM | 0.5 | 0.5 |

198. Pursuant to §19.503 of Regulation 19, and 40 CFR Part 52, Subpart E, visible emissions from these sources shall not exceed 20% opacity. The permittee shall demonstrate compliance with this Specific Condition by conducting a visible opacity

observation of these sources at least once each calendar week in which these sources operate and keep a record of these observations. If visible emissions appear to exceed 20% opacity, the permittee shall take corrective action, and perform and record the observation again. If visible emissions still appear to exceed 20% opacity, the permittee shall conduct a 6-minute opacity reading in accordance with EPA Reference Method #9. The records of visible emission observations and results of any Method #9 readings shall be kept on site for five years and made available to Department personnel upon request.

199. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall not crush more than 59,520 tons of material per month at SN-R23. Compliance shall be demonstrated through compliance with Specific Condition #200.
200. Pursuant to §19.705 of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of material crushed at SN-R23. These records shall be maintained on a weekly basis. These records shall be kept on site and made available to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.
201. Pursuant to §19.705 of Regulation 19, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR 70.6, the permittee shall use only #2 fuel oil as fuel at SN-R22.

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SN-Q1
Quarry Haul Road

Source Description

Quarried material is hauled to the crushing area via this road.

Specific Conditions

202. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #204.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM ₁₀ | 5.2 | 22.5 |

203. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #204.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM | 23.5 | 102.8 |

204. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6, the permittee shall water this haul road in accordance with a haul road watering plan. This plan shall be designed to minimize emissions from this source. A copy of this plan shall be kept on site and made available to Department personnel upon request.

SN-Q2
Primary Crusher

Source Description

Quarried chalk is crushed at this source before being hauled to the raw materials storage area. This source was installed prior to the applicability date of NSPS Subpart OOO.

Specific Conditions

205. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #207.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM ₁₀ | 0.5 | 1.9 |

206. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #207.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM | 0.5 | 1.9 |

207. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6, the permittee shall not crush more than 1,116,000 tons per month at this source. Compliance shall be demonstrated through compliance with Specific Condition #208.
208. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of material crushed at this source. These records shall be maintained on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. These records shall be kept on site and made available to Department personnel upon request. A report of these records shall be submitted to the Department in accordance with General Provision #7.

209. Pursuant to §19.501 of Regulation 19 and 40 CFR part 52, Subpart E, visible emissions from this source shall not exceed 20% opacity. Compliance shall be demonstrated through compliance with Plantwide Condition #9.

Uncontrolled Emission Points in the Quarry

Source Description

The quarry contains many different pieces of equipment. Emissions sources primarily consist of transfer points. The uncontrolled emission rates were found based on equipment maximums using emission factors contained in AP-42 table 11.19.2-2. These sources were installed prior to the applicability date of NSPS Subpart OOO.

Specific Conditions

210. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance is based on the maximum capacity of the equipment and continuous operation.

| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|--|------------------|--------------|------------|
| Q3 | Transfer from Belt 2N to Belt 1N | PM ₁₀ | 0.1 | 0.4 |
| Q4 | Transfer from Belt 1N to Tripper Belt | PM ₁₀ | 0.1 | 0.4 |
| Q5 | Discharge from Tripper Belt to Chalk Storage | PM ₁₀ | 0.1 | 0.4 |
| Q6 | Scraper Dumping to Auxiliary Crusher | PM ₁₀ | 0.1 | 0.2 |
| Q7 | Hopper 3 Discharge to 1.12 Belt (Auxiliary System) | PM ₁₀ | 0.1 | 0.2 |
| Q9 | Discharge from Belt 1 to Tripper Belt (Auxiliary System) | PM ₁₀ | 0.1 | 0.2 |

211. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance is based on the maximum capacity of the equipment and continuous operation.

| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|--------------------|------------------|--------------|------------|
|-----------|--------------------|------------------|--------------|------------|

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| SN | Source Name | Pollutant | lb/hr | tpy |
|-----------|--|------------------|--------------|------------|
| Q3 | Transfer from Belt 2N to Belt 1N | PM | 0.1 | 0.4 |
| Q4 | Transfer from Belt 1N to Tripper Belt | PM | 0.1 | 0.4 |
| Q5 | Discharge from Tripper Belt to Chalk Storage | PM | 0.1 | 0.4 |
| Q6 | Scraper Dumping to Auxiliary Crusher | PM | 0.1 | 0.2 |
| Q7 | Hopper 3 Discharge to 1.12 Belt (Auxiliary System) | PM | 0.1 | 0.2 |
| Q9 | Discharge from Belt 1 to Tripper Belt (Auxiliary System) | PM | 0.1 | 0.2 |

212. **Pursuant to §19.501 of Regulation 19 and 40 CFR part 52, Subpart E, visible emissions from this source shall not exceed 20% opacity.** Compliance shall be demonstrated through compliance with Plantwide Condition #9.

SN-Q8
Auxiliary Crusher

Source Description

This crusher serves as a backup to SN-Q2.

Specific Conditions

213. Pursuant to §19.501 et seq of Regulation 19 and 40 CFR Part 52, Subpart E, the permittee shall not exceed the emission limits set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #215.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM ₁₀ | 0.5 | 2.2 |

214. Pursuant to §18.801 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the permittee shall not exceed the emission rates set forth in the following table. Compliance shall be demonstrated through compliance with Specific Condition #215.

| Pollutant | lb/hr | tpy |
|------------------|--------------|------------|
| PM | 1.1 | 4.7 |

215. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 70.6, the permittee shall not crush more than 632,400 tons per month at this source. Compliance shall be demonstrated through compliance with Specific Condition #216.
216. Pursuant to §19.705 of Regulation 19, §18.1004 of Regulation 18, A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, and 40 CFR Part 52, Subpart E, the permittee shall maintain records of the amount of material crushed at this source. These records shall be maintained on a monthly basis and updated by the 15th day of the month following the month to which the records pertain. These records shall be kept on site and made available to Department personnel upon request. This source was installed prior to the applicability date of NSPS Subpart OOO.
217. **Pursuant to §19.501 of Regulation 19 and 40 CFR Part 52, Subpart E, visible**

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emissions from this source shall not exceed 20% opacity. The permittee shall demonstrate compliance with this Specific Condition by conducting a visible opacity observation of the source at least once each calendar week in which the source operates and keep a record of these observations. If visible emissions appear to exceed 20% opacity, the permittee shall take corrective action, and perform and record the observation again. If visible emissions still appear to exceed 20% opacity, the permittee shall conduct a 6-minute opacity reading in accordance with EPA Reference Method #9. The records of visible emission observations and results of any Method #9 readings shall be kept on site for five years and made available to Department personnel upon request.

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SECTION V: COMPLIANCE PLAN AND SCHEDULE

Ash Grove Cement Company is in compliance with the applicable regulations cited in the permit application. Ash Grove Cement Company will continue to operate in compliance with those identified regulatory provisions. The facility will examine and analyze future regulations that may apply and determine their applicability with any necessary action taken on a timely basis.

SECTION VI: PLANTWIDE CONDITIONS

1. Pursuant to §19.4(o) of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the Director shall be notified in writing within thirty (30) days after construction has commenced, construction is complete, the equipment and/or facility is first placed in operation, and the equipment and/or facility first reaches the target production rate.
2. Pursuant to §19.4(q) of Regulation 19 and 40 CFR Part 52, Subpart E, the Director may cancel all or part of this permit if the construction or modification authorized herein is not begun within 18 months from the date of the permit issuance or if the work involved in the construction or modification is suspended for a total of 18 months or more.
3. Pursuant to §19.7 of Regulation 19, 40 CFR Part 52, Subpart E, and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, each emission point for which an emission test method is specified in this permit shall be tested in order to determine compliance with the emission limitations contained herein within sixty (60) days of achieving the maximum production rate, but in no event later than 180 days after initial start-up of the permitted source. The permittee shall notify the Department of the scheduled date of compliance testing at least fifteen (15) days in advance of such test. Compliance test results shall be submitted to the Department within thirty (30) days after the completed testing. The permittee shall provide:
 - (1) Sampling ports adequate for applicable test methods
 - (2) Safe sampling platforms
 - (3) Safe access to sampling platforms
 - (4) Utilities for sampling and testing equipment
4. Pursuant to Regulation 19.3 and A.C.A. §8-4-203 as referenced by A.C. A. §8-4-304 and §8-4-311, the equipment, control apparatus and emission monitoring equipment shall be operated within their design limitations and maintained in good condition at all times.
5. Pursuant to Regulation 26 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit subsumes and incorporates all previously issued air permits for this facility.
218. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §3-4-311 and 40 CFR Part 61, Subpart FF, Benzene Waste Operations, §61.348(d), a treatment process or waste stream is in compliance with the requirements of this subpart and exempt from the requirements of paragraph (c) of this section provided that the owner or operator documents that the treatment process or waste stream is in compliance with other regulatory requirements as follows:

- i. The treatment process is a hazardous waste incinerator for which the owner or operator has been issued a final permit under 40 CFR Part 270 and complies with the requirements of 40 CFR Part 264, Subpart O;
 - ii. The treatment process is an industrial furnace or boiler burning hazardous waste for energy recovery for which the owner or operator has been issued a final permit under 40 CFR Part 270 and complies with the requirements of 40 CFR Part 266, Subpart D.
- 219. Pursuant to §19.304 of Regulation 19 and 40 CFR 63.6(e)(3)(i), the facility shall develop and implement a written startup, shutdown, and malfunction plan for those sources indicated as being subject to 40 CFR Part 63, Subpart FF, *National Emission Standards for Hazardous Air Pollutants from Benzene Waste Operations*. The plan shall include those items listed in 40 CFR 63.6(e)(3) et seq. The plan shall be maintained on site and be available to Department personnel upon request.
- 220. Pursuant to 40 CFR Part 63, Subpart DD, *National Emission Standards for Hazardous Air Pollutants from Off-Site Waste and Recovery Operations*, the permittee is exempted from certain requirements of this subpart, specifically §§ 63.685 (tanks), 63.688 (containers) and 63.693 (closed vent/containment devices) because the unit is subject to equivalent requirements imposed pursuant to 40 CFR 61, Subpart FF, *Benzene Waste Operations*.
- 221. Pursuant to §18.1004 of Regulation 18 and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the visible emission observations shall be used as a method of compliance verification for the opacity limits assigned for the sources whose Specific Conditions reference this Plantwide Condition. The weekly observations shall be conducted by someone familiar with the facility's visible emissions. If during the observations, visible emissions are detected which appear to be in excess of the permitted opacity limit, the permittee shall:
 - a. Take immediate action to identify the cause of the visible emissions,
 - b. Implement corrective action, and
 - c. If excessive visible emissions are still detected, an opacity reading shall be conducted in accordance with EPA Reference Method 9 for point sources and in accordance with EPA Method 22 for non-point sources. This reading shall be conducted by a person trained and certified in the reference method. If the opacity reading exceeds the permitted limit, further corrective measures shall be taken.

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- d. If no excessive visible emissions are detected, the incident shall be noted in the records as described below.

The permittee shall maintain records related to all visible emission observations and Method 9 readings. These records shall be updated on an as-performed basis. These records shall be kept on site and made available to Department personnel upon request. These records shall contain:

- a. The time and date of each observation/reading any observance of visible emissions appearing to be above permitted limits or any Method 9 reading which indicates exceedance,
 - b. The cause of any observed exceedance of opacity limits, corrective actions taken, and results of the reassessment, and
 - c. The name of the person conducting the observation/reading.
222. Pursuant to §19.304 of Regulation 19 and 40 CFR 63, Subpart EEE, *National Emission Standards for Hazardous Air Pollutants From Hazardous Waste Combustors*, this facility is considered an affected source and is subject, but not limited to, the following requirements. The referenced requirements will also include the applicable Subpart EEE NESHAP amendments promulgated by the EPA and as incorporated in the Code of Federal Regulations. Alternatives to the requirements contained in this permit must be approved by the Administrator. Once the Department has received written notification of approval of alternative requirements, the alternate requirements may be implemented. These requirements shall not be in effect for existing affected sources until September 30, 2003, unless an extension of this deadline is granted by the Administrator.

Emission Limits

- a. Pursuant to §63.1204(a), the permittee shall not discharge or cause combustion gases to be emitted into the atmosphere that contain :
 - i. For dioxins and furans:
 - (1) Emissions in excess of 0.20 ng TEQ/dscm corrected to 7 percent oxygen;
or
 - (2) Emissions in excess of 0.40 ng TEQ/dscm corrected to 7 percent oxygen provided that the combustion gas temperature at the inlet to the initial dry particulate matter control device is 400 EF or lower based on the average of the test run average temperatures;
 - ii. Mercury in excess of 120 µg/dscm corrected to 7 percent oxygen;
 - iii. Lead and cadmium in excess of 330 µg/dscm, combined emissions, corrected to 7 percent oxygen;

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- iv. Arsenic, beryllium, and chromium in excess of 56 µg/dscm, combined emissions, corrected to 7 percent oxygen;
- v. Carbon monoxide and hydrocarbons.
 - (1) For kilns equipped with a by-pass duct or midkiln gas sampling system, either:
 - (a) Carbon monoxide in the by-pass duct or midkiln gas sampling system in excess of 100 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis and corrected to 7 percent oxygen, and hydrocarbons in the by-pass duct in excess of 10 parts per million by volume over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen, and reported as propane, at any time during the destruction and removal efficiency (DRE) test runs or their equivalent as provided by §63.1206(b)(7); or
 - (b) Hydrocarbons in the by-pass duct or midkiln gas sampling system in excess of 10 parts per million by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen and reported as propane;
 - (2) For kilns not equipped with a by-pass duct or midkiln gas sampling system, either;
 - (a) Hydrocarbons in the main stack in excess of 20 ppm by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen, and reported as propane; or
 - (b) Carbon monoxide in the main stack in excess of 100 ppm by volume, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis and corrected to 7 percent oxygen, and hydrocarbons in the main vent stack in excess of 20 ppm by volume over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7 percent oxygen and reported as propane, at any time during the DRE test runs or their equivalent as provided by §63.1206(b)(7).
- vi. Hydrochloric acid and chlorine gas in excess of 130 ppm by volume, combined emissions, expressed as hydrochloric acid equivalents, dry basis, corrected to 7 percent oxygen; and
- vii. Particulate matter in excess of 0.15 kg/Mg dry feed and opacity greater than 20 percent.

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- (1) The permittee must use suitable methods to determine the kiln raw material feedrate.
- (2) Except as provided in paragraph (a)(7)(iii) of this section, the permittee must compute the particulate matter emission rate, E, from the following equation:

$$E = (C_s H Q_{sd})/P$$

Where:

E = emission rate of particulate matter, kg/Mg of raw material feed;

C_s = concentration of particulate matter, kg/dscm

Q_{sd} = volumetric flowrate of effluent gas, dscm/hr

P = total kiln raw material feed (dry basis), Mg/hr.

- (3) If the permittee operates a preheater or preheater/precalciner kiln with dual stacks, they must test simultaneously and compute the combined particulate matter emission rate, E_c, from the following equation:

$$E_c = (C_{sk} H Q_{sdk} + C_{sb} H Q_{sdb})/P \quad \text{Where:}$$

E_c = the combined emission rate of particulate matter from the kiln and bypass stack, kg/Mg of raw material feed;

C_{sk} = concentration of particulate matter in the kiln effluent, kg/dscm;

Q_{sdk} = volumetric flowrate of kiln effluent gas, dscm/hr;

C_{sb} = concentration of particulate matter in the bypass stack effluent, kg/dscm;

Q_{sdb} = volumetric flowrate of bypass stack effluent gas, dscm/hr;

P = total kiln raw material feed (dry basis), Mg/hr

Destruction and removal efficiency (DRE) standard

- b. Pursuant to §63.1204(c)(1), except as provided in paragraph (c)(2) of this section, the permittee must achieve a destruction and removal efficiency of 99.99% for each principle organic hazardous constituent (POHC) designated under paragraph (c)(3) of this section. The permittee must calculate DRE for each POHC from the following equation:

$$DRE = [1 - (W_{out}/W_{in})] \times 100\%$$

Where:

W_{in} = mass feedrate of one POHC in a waste feedstream; and

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W_{out} = mass emission rate of the same POHC present in exhaust emissions prior to release to the atmosphere

- c. Pursuant to §63.1204(c)(2), if the permittee burns dioxin-listed hazardous wastes FO20, FO21, FO22, FO23, FO26, or FO27 (see §261.31 of this chapter), the permittee must achieve a DRE of 99.9999% for each POHC that is designated under paragraph (c)(3) of this section. The permittee must demonstrate this DRE performance on POHCs that are more difficult to incinerate than tetro-, penta, and hexachlorodibenzo-p-dioxins and dibenzofurans. The equation in paragraph (c)(1) of this section shall be used to calculate DRE for each POHC. In addition, the permittee must notify the Administrator of the intent to burn hazardous wastes FO20, FO21, FO22, FO23, FO26, or FO27.
- d. Pursuant to §63.1204(c)(3)(i), the permittee must treat the POHCs in the waste feed that are specified under paragraph (c)(3)(ii) of this section to the extent required by paragraphs (c)(1) and (c)(2) of this section.
- e. Pursuant to §63.1204(c)(3)(ii), the permittee must specify one or more POHCs from the list of hazardous air pollutants established by 42 U.S.C. 7412(b)(1), excluding caprolactam (CAS number 105602) as provided by §63.60, for each waste to be burned. The permittee must base this specification on the degree of difficulty of incineration of the organic constituents in the waste and on their concentration or mass in the waste feed, considering the results of waste analyses or other data and information.

Compliance Date:

- f. Pursuant to §63.1206(a)(1), the permittee must comply with the standards set forth in this subpart no later than September 30, 2003 unless the Administrator grants an extension of time under §63.6(i) or §63.1213.
- g. Pursuant to §63.1206(b)(1), the emission standards and operating requirements set forth in this subpart apply at all times except:
 - i. During startup, shutdown, and malfunction, provided that hazardous waste is not in the combustion chamber (i.e., the hazardous waste feed to the combustor has been cutoff for a period time not less than the hazardous waste residence time) during those periods of operation, as provided by paragraph (c)(2)(ii) of this section; and
 - ii. When hazardous waste is not in the combustion chamber (i.e., the hazardous waste feed to the combustor has been cutoff for a period time not less than the hazardous waste residence time), and the permittee has

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- (1) submitted a written, one-time notice to the Administrator documenting compliance with all applicable requirements and standards promulgated under authority of the Clean Air Act, including sections 112 and 129; and
- (2) Documented in the operating record that you are complying with such applicable requirements in lieu of the emission standards and operating requirements of this subpart.

Applicability of particulate matter and opacity standards during particulate matter correlation tests

- h. Pursuant to §63.1206(b)(8)(i) and (ii), any particulate matter and opacity standards or any permit or other emissions operating parameter limits or conditions, including any limitation on workplace practices, that are applicable to hazardous waste combustors to insure compliance with any particulate matter or opacity standard of parts 60, 61, 63, 264, 265, and 266 of this chapter (i.e., any title 40 particulate or opacity standards) applicable to hazardous waste combustor do not apply while the permittee conducts particulate matter continuous emissions monitoring system (CEMS) correlation tests.
- i. Pursuant to §63.1206(b)(8)(iii)(A) and (B), for provisions of this section to apply, the permittee must develop a particulate matter CEMS correlation test plan that includes the following information. This test plan may be included as part of the comprehensive performance test plan required under §§63.1207(e) and (f):
 - i. Number of test conditions and number of runs for each test condition;
 - ii. Target particulate matter emission level for each test condition;
 - iii. How you plan to modify operations to attain the desired particulate matter emission levels; and
 - iv. Anticipated normal emission levels; and
 - v. Submit the test plan to the Administrator for approval at least 90 calendar days before the correlation test is scheduled to be conducted.
- j. Pursuant to §63.1206(b)(8)(iv), if the Administrator fails to approve or disapprove the correlation test plan with the time period specified by §63.7(c)(3)(i), the plan is considered approved, unless the Administrator has requested additional information.
- k. Pursuant to §63.1206(b)(8)(v), the particulate matter and associated operating limits and conditions will not be waived for more than 96 hours, in the aggregate, for a correlation test, including all runs of all test conditions, unless more time is approved by the Administrator.

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- l. Pursuant to §63.1206(b)(8)(vii), the permittee must return to operating conditions indicative of compliance with the applicable particulate matter and opacity standards as soon as possible after correlation testing is completed.

Alternative Standards for Existing Hazardous Waste Burning Cement Kilns Using MACT

- m. Pursuant to §63.1206(b)(10)(i), the permittee may petition the Administrator to recommend alternative semivolatile, low volatile metal, mercury, and/or hydrochloric acid/chlorine gas emission standards if:
 - i. The permittee cannot achieve one or more of the standards while using MACT because of raw material contributions to emissions of the regulated metals or hydrochloric acid/chlorine gas; or
 - ii. The permittee determines that mercury is not present at detectable levels in the raw material.
- n. Pursuant to §63.1206(b)(10)(ii), the alternative standard recommended under paragraph (b)(10)(i)(A) of this section may be an operating requirement, such as a hazardous waste feedrate limitation for metals and/or chlorine and/or an emission limitation.
- o. Pursuant to §63.1206(b)(10)(iii), the alternative standard must include a requirement to use MACT, or better, applicable to the standard for which the source is seeking relief, as defined in paragraphs (b)(10)(viii) and (ix) of this section.
- p. Pursuant to §63.1206(b)(10)(iv)(A) through §63.1206(b)(10)(ix)(D), the alternative standard petitions submitted under this section must include data or information required by this section.

Calculation of hazardous waste residence time

- q. Pursuant to §63.1206(b)(11), the permittee must calculate the hazardous waste residence time and include the calculation in the performance test plan under §63.1207(f) and the operating record. The permittee must also provide the hazardous waste residence time in the Documentation of Compliance under §63.1211(d) and the Notification of Compliance under §§63.1207(j) and 63.1210(d).

Documenting compliance with the standard based on performance testing

- r. Pursuant to §63.1206(b)(12)(i), the permittee must conduct a minimum of three runs of a performance test required under §63.1207 to document compliance with the emission standards of this subpart.

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- s. Pursuant to §63.1206(b)(12)(ii), the permittee must document compliance with the emission standards based on the arithmetic average of the emission results of each run, except that the permittee must document compliance with the destruction and removal efficiency standard for each run of the comprehensive performance test individually.

Cement kilns which feed hazardous waste at a location other than the end where products are normally discharged and where fuels are normally fired.

- t. Pursuant to §63.1206(b)(13)(i), cement kilns that feed hazardous waste at a location other than the end where products are normally discharged and where fuels are normally fired must comply with the carbon monoxide and hydrocarbon standards of §63.1204 as follows:
 - i. Existing sources must comply with the 20 parts per million by volume hydrocarbon limit, over an hourly rolling average (monitored continuously with a continuous emissions monitoring system), dry basis, corrected to 7% oxygen, and reported as propane.

General Operating Requirements

- u. Pursuant to §63.1206(c)(1)(i), the permittee must operate only under the operating requirements specified in the Documentation of Compliance under §63.1211(d) or the Notification of Compliance under §§63.1207(j) and 63.1210(d), except:
 - i. Pursuant to §63.1206(c)(1)(i)(A), during performance tests under approved test plans according to §63.1207(e), (f), and (g), and
 - ii. Pursuant to §63.1206(c)(1)(i)(B)(i), under the conditions of paragraph (b)(1)(i) or (ii) of this section
 - (1) Pursuant to §63.1206(c)(1)(i)(B)(ii), the Documentation of Compliance and the Notification of Compliance must contain operating requirements including, but not limited to, the operating requirements of this section and §63.1209.
 - (2) Pursuant to §63.1206(c)(1)(i)(B)(iii), failure to comply with the operating requirements is failure to ensure compliance with the emissions standards of this subpart.
 - (3) Pursuant to §63.1206(c)(1)(i)(B)(iv), operating requirements in the Notification of Compliance are applicable requirements for purposes of parts 70 and 71 of this chapter.

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- (4) Pursuant to §63.1206(c)(1)(i)(B)(v), the operating requirements specified in the Notification of Compliance will be incorporated in the Title V permit.
- v. Pursuant to §63.1206(c)(2)(i), except as provided in by paragraph (c)(2)(ii) of this section, the permittee is subject to the startup, shutdown, and malfunction plan requirements of §63.6(e)(3).
 - i. Pursuant to §63.1206(c)(2)(ii), the permittee is subject to the startup, shutdown, and malfunction plan requirements of §63.6(e)(3) even if the permittee follows the startup and shutdown procedures and the corrective measures upon malfunction that are prescribed in the startup, shutdown, and malfunction plan, the emission combustion chamber.
 - ii. Pursuant to §63.1206(c)(2)(iii), the permittee must identify in the plan the projected oxygen correction factor based on normal operations to use during periods of startup and shutdown.
 - iii. Pursuant to §63.1206(c)(2)(iv), the permittee must record the plan in the operating record.
- w. Pursuant to §63.1206(c)(3)(i), upon the compliance date, the permittee must operate the combustor with a functioning system that immediately and automatically cuts off the hazardous waste feed, except as provided by paragraph (c)(3)(viii) of this section, when the following conditions apply:
 - i. Pursuant to §63.1206(c)(3)(i)(A), when operating parameter limits specified under §63.1209; an emission standard monitored by CEMS; and the allowable combustion chamber pressure;
 - ii. Pursuant to §63.1206(c)(3)(i)(B), when the span value of any CMS detector, except a CEMS, is met or exceeded;
 - iii. Pursuant to §63.1206(c)(3)(i)(C), upon malfunction of a CMS monitoring an operating parameter limit specified under §63.1209 or an emission level; or
 - iv. Pursuant to §63.1206(c)(3)(i)(D), when any component of the automatic waste feed cutoff system fails.
- x. Pursuant to §63.1206(c)(3)(ii), during an automatic waste feed cutoff (AWFCO) the permittee must continue to duct combustion gases to the air pollution control system while hazardous waste remains in the combustion chamber.
- y. Pursuant to §63.1206(c)(3)(iii), the permittee must continue to monitor during the cutoff the operating parameters for which limits are established under §63.1209 and

the emissions required under that section to be monitored by a CEMS, and the permittee shall not restart the hazardous waste feed until the operating parameters and emission levels are within specified limits.

- z. Pursuant to §63.1206(c)(3)(iv), if the AWFCO system fails to automatically and immediately cutoff the flow of hazardous waste upon exceedance of a parameter required to be interlocked with the AWFCO system under paragraph (c)(3)(i) of this section, the permittee has failed to comply with the AWFCO requirements of paragraph (c)(3) of this section.
- aa. Pursuant to §63.1206(c)(3)(v), if, after any AWFCO, there is an exceedance of any emission standard or operating requirement, irrespective of whether the exceedance occurred while hazardous waste remained in the combustion chamber, the permittee shall investigate the cause of the AWFCO, take appropriate corrective measures to minimize future AWFCOs and record the findings and corrective measures in the operating record.
- bb. Pursuant to §63.1206(c)(3)(vi)(A), for each set of 10 exceedances of an emissions standard or operating requirement while hazardous waste remains in the combustion chamber during a 60-day block period, the permittee must submit to the Administrator a written report within 5 calendar days of the 10th exceedance documenting the exceedances and the results of the investigation and corrective measures taken.
- cc. Pursuant to §63.1206(c)(3)(vi)(B), on a case-by-case basis, the Administrator may require excessive exceedance reporting when fewer than 10 exceedances occur during a 60-day block period.
- dd. Pursuant to §63.1206(c)(3)(vii), the AWFCO system and associated alarms must be tested at least weekly to verify operability, unless the permittee documents in the operating record that weekly inspections will unduly restrict or upset operations and that less frequent inspection will be adequate. At a minimum, the permittee must conduct operability testing at least monthly. The permittee must document and record in the operating record AWFCO operability test procedures and results.
- ee. Pursuant to §§63.1209(a)(1)(ii), the permittee shall use a COMS to demonstrate and monitor compliance with the opacity standard under §§63.1204(a)(7) and (b)(7) at each point where emissions are vented from these affected sources including the bypass stack of a preheater/precalciner kiln with dual stacks.

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- ff. Pursuant to §§63.1206(c)(5)(i through ii), the permittee is subject to the combustion system leak control system operating and reporting requirements set forth in this section.
- gg. Pursuant to §§63.1206(c)(6)(i through v), the permittee is subject to the operator training and certification standards set forth in this section.
- hh. Pursuant to §63.1206(c)(7)(i)(A-D), the permittee must prepare and at all times operate according to an operation and maintenance plan which complies with the requirements set forth in these sections.

Performance Testing Requirements

- ii. Pursuant to §§63.1207(a-n), the permittee must conduct performance testing in accordance with the applicable requirements contained in this section.
- jj. Pursuant to §63.1207(c)(1), the permittee must commence the initial comprehensive performance test not later than six months after the compliance date.
- kk. Pursuant to §63.1207(C)(2)(i), the permittee may request that previous emissions test data serve as documentation of conformance with the emission standards of this subpart provided that the previous testing:
 - i. Results in data that meet quality assurance objectives (determined on a site-specific basis) such that the results adequately demonstrate compliance with the applicable standard;
 - ii. Was in conformance with the requirements of paragraph (g)(1) of this section; and,
 - iii. Was sufficient to establish the applicable operating parameter limits under §63.1209.
- ll. Pursuant to §63.1207(d)(1) through (3), the permittee must conduct testing periodically as described in paragraphs (d)(1) through (3) of this section. The date of commencement of the initial comprehensive performance test is the basis for establishing the deadline to commence the initial confirmatory performance test and the next comprehensive performance test. The permittee may conduct performance testing at any time prior to the required date. The deadline for commencing subsequent confirmatory and comprehensive performance testing is based on the date of commencement of the previous comprehensive performance test.
 - i. The permittee must commence testing no later than 61 months after the date of commencing the previous comprehensive performance test.

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- ii. The permittee must commence confirmatory performance testing no later than 31 months after the date of commencing the previous comprehensive performance test. To insure that the confirmatory test is conducted approximately midway between comprehensive performance tests, the Administrator will not approve a test plan that schedules testing within 18 months of commencing the previous comprehensive performance test.
- iii. The permittee must complete performance testing within 60 days after the date of commencement, unless the Administrator determines that a time extension is warranted based on documentation in writing of factors beyond the permittee's control that prevent testing from being completed within 60 days.
- mm. Pursuant to §63.1207(e)(i), the permittee must submit to the Administrator a notification of intent to conduct a comprehensive performance test and CMS performance evaluation and a site specific test plan and CMS performance evaluation plan at least one year before the performance test and performance evaluation are scheduled to begin.
- nn. Pursuant to §63.1207(e)(i)(B), the permittee must submit to the Administrator a notification of intent to conduct the comprehensive performance test at least 60 calendar days before the test is scheduled to begin.
- oo. Pursuant to §63.1207(e)(ii), the permittee must submit to the Administrator a notification of intent to conduct a confirmatory performance test and CMS performance evaluation and a test plan and CMS performance evaluation plan at least 60 calendar days before the performance test is scheduled to begin.

Test Methods

- pp. Pursuant to §§63.1208(a-b), the permittee shall use the test methods contained in this section when determining compliance with the emissions standards of this subpart.

Monitoring Requirements

- qq. Pursuant to §§63.1209 (a-q), the permittee is subject to the applicable monitoring requirements contained in these sections.
- rr. Pursuant to §63.1209(a)(1)(i), the permittee must use a CEMS to demonstrate and monitor compliance with the carbon monoxide and hydrocarbon standards under this subpart. The permittee must also use an oxygen CEMS to continuously correct the carbon monoxide and hydrocarbon levels to 7 percent oxygen.

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- ss. Pursuant to §63.1209(a)(1)(iii), the permittee must install, calibrate, maintain, and operate a particulate matter CEMS to demonstrate and monitor compliance with the particulate matter standards under this subpart. However, compliance with the requirements in their section to install, calibrate, maintain, and operate the PM CEMS is not required until such time that the Agency promulgates all performance specifications and operational requirements applicable to PM CEMS.
- tt. Pursuant to §63.1209(a)(2), the permittee must install, calibrate, maintain, and continuously operate the COMS and CEMS in compliance with the quality assurance procedures provided in the appendix to this subpart and Performance Specifications 1 (opacity), 4B (carbon monoxide and oxygen), and 8A (hydrocarbons) in Appendix B, Part 60 of this chapter.
- uu. Pursuant to §63.1209(c)(1), prior to feeding the material, the permittee must obtain an analysis of each feedstream that is sufficient to document compliance with the applicable feedrate limits provided in this section.
- vv. Pursuant to §63.1209(c)(2), the permittee must develop and implement a feedstream analysis plan and record it in the operating record.
- ww. Pursuant to §63.1209(c)(3), the permittee must submit the feedstream analysis plan to the Administrator for review and approval, if requested.
- xx. Pursuant to §63.1209(c)(4), to comply with the applicable feedrate limits of this section, the permittee must monitor and record the feedrates as follows:
 - i. Determine and record the value of the parameter for each feedstream by sampling and analysis or other method;
 - ii. Determine and record the mass or volume flowrate of each stream by a CMS. If the permittee determines flowrate of a feedstream by volume, the permittee must determine and record the density of the feedstream by sampling and analysis (unless the permittee reports the constituent concentration in units of weight per volume); and
 - iii. Calculate and record the mass feedrate of the parameter per unit time.
- yy. Pursuant to §63.1209(d)(1), the requirements of §§63.8(d) (Quality control program) and (e) (Performance evaluation of continuous monitoring systems) apply, except that the permittee must conduct performance evaluations components of the CMS under the frequency and procedures (for example, submittal of performance evaluation test plan for review and approval) applicable to performance tests as provided by §63.1207.

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- zz. Pursuant to §63.1209(j), to remain in compliance with the destruction and removal efficiency (DRE) standards, the permittee must establish operating limits during the comprehensive performance test (or during a previous DRE test under provisions of §63.1206(b)(7)) for the following parameters, unless the limits are based on manufacturer specifications and comply with those limits at all times that hazardous waste remains in the combustion chamber.
- aaa. Pursuant to §63.1209(j)(1)(i), the permittee must measure the temperature of each combustion chamber at a location that best represents, as practicable, the bulk gas temperature in the combustion zone. The permittee must document the temperature measurement location in the test plan submitted under §63.1207(e).
- bbb. Pursuant to §63.1209(j)(2)(i), as an indicator of gas residence time in the control device, the permittee must establish and comply with a limit on the maximum flue gas flowrate, the maximum production rate, or another parameter that is documented in the site-specific test plan as an appropriate surrogate for gas residence time, as the average of the maximum hourly rolling averages for each run.
- ccc. Pursuant to §63.1209(j)(3)(i), the permittee must establish limits on the maximum pumpable and total (i.e., pumpable and nonpumpable) hazardous waste feedrate for each location where hazardous waste is fed.
- ddd. Pursuant to §63.1209(j)(4), the permittee must specify operating parameters and limits to insure that good operation of each hazardous waste firing system is maintained.
- eee. Pursuant to §63.1209(k), the permittee must comply with the dioxin and furans emission standard by establishing and complying with the following operating parameter limits. You must base the limits on operations during the comprehensive performance test, unless the limits are based on manufacturer specifications.
- fff. Pursuant to §63.1209(k)(1)(i), the permittee must establish a limit on the maximum temperature of the gas at the inlet to the device on an hourly rolling average. The permittee must establish the hourly rolling average limit as the average of the test run averages.
- ggg. Pursuant to §63.1209(k)(2)(i), the permittee must measure the temperature of each combustion chamber at a location that best represents, as practicable, the bulk gas temperature in the combustion zone. The permittee must document the temperature measurement location in the test plan.

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- hhh. Pursuant to §63.1209(k)(3)(i), as an indicator of gas residence time in the control device, the permittee must establish and comply with a limit on the maximum flue gas flowrate, the maximum production rate, or another parameter which is an appropriate surrogate for residence time.
- iii. Pursuant to §63.1209(k)(4)(i), the permittee must establish limits on the maximum pumpable and total (pumpable and nonpumpable) waste feedrate for each location where waste is fed.
- jjj. Pursuant to §63.1209(m), the permittee must comply with the particulate matter emission standard by establishing and complying with the operating parameter limits found in §63.1209(m) of this subpart.
- kkk. Pursuant to §63.1209(m)(1)(ii), if the combustor is equipped with a baghouse, the permittee must establish a limit on the minimum pressure drop and the maximum pressure drop across each baghouse cell based on manufacturer's specifications. The permittee must comply with the limit on an hourly rolling average.
- lll. Pursuant to §63.1209(n), the permittee must comply with the semivolatile metal (cadmium and lead) and low volatile metal (arsenic, beryllium, and chromium) emission standards by establishing and complying with the following operating parameter limits.
 - i. Pursuant to §63.1209(n)(1), the permittee must establish a limit on the maximum inlet temperature to the primary dry metals emissions control device on an hourly rolling basis as the average of the test run averages.
 - ii. Pursuant to §63.1209(n)(2)(i), the permittee must establish feedrate limits for semivolatile metals and low volatile metals.
 - iii. Pursuant to §63.1209(n)(3), the permittee must establish operating parameter limits on the particulate matter control device as specified by paragraph 63.1209(m)(1).
 - iv. Pursuant to §63.1209(n)(4), the permittee must establish a 12-hour rolling average limit for the feedrate of total chlorine and chloride in all feedstreams as the average of the average hourly rolling averages for each run.
- mmm. Pursuant to §63.1209(p), if the permittee complies with the requirements for combustion system leaks under §63.1206(c)(5) by maintaining combustion chamber zone pressure lower than ambient pressure, the permittee must monitor the pressure instantaneously and the automatic waste feed cutoff system must be engaged when negative pressure is not maintained at any time.

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Notification Requirements

- nnn. Pursuant to §63.1210(a)(1), the permittee shall submit all of the applicable notifications prior to the deadlines established in this subpart.
- ooo. Pursuant to §63.1210(a)(2), the permittee must submit the required notifications outlined in this section to the Administrator in order to request or elect to comply with the alternative requirements contained in this subpart.
- ppp. Pursuant to §63.1210(d)(2), upon postmark of the Notification of Compliance, the operating parameter limits identified in the Notification of Compliance, as applicable, shall be complied with, the limits identified in the Document of Compliance or a previous Notification of Compliance are no longer applicable.

Recordkeeping and Reporting Requirements

- qqq. Pursuant to §63.1211, the permittee shall submit the reports required by this subpart to the Administrator prior to the deadlines set forth in this subpart.

Procedure for Extending the Compliance Date

- rrr. Pursuant to §63.1213, the permittee may request an extension of the compliance date to install pollution prevention or waste minimization controls provided that the conditions outlined in this section are met.
223. Pursuant to §19.304 of Regulation 19 and 40 CFR Part 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry*, this facility is considered an affected facility and is subject, but not limited to, the following requirements. The referenced requirements will also include the applicable Subpart LLL NESHAP amendments promulgated by the EPA and as incorporated in the Code of Federal Regulations.

Standards for kilns

- a. Pursuant to §63.1343(b), the permittee shall not cause to be discharged into the atmosphere from these affected sources any gases which:
 - i. Contain particulate matter (PM) in excess of 0.15 kg per Mg (0.30 lb per ton) of feed (dry basis) to the kiln. When there is an alkali bypass associated with a kiln or in-line kiln/raw mill, the combined particulate matter emissions from the

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- kiln or in-line kiln/raw mill and the alkali bypass are subject to this emission limit.
- ii. Exhibit opacity greater than 20 percent.
 - iii. Contain D/F in excess of:
 - (1) 0.20 ng per dscm (8.7×10^{-11} gr per dscf) (TEQ) corrected to seven percent oxygen; or
 - (2) 0.40 ng per dscm (1.7×10^{-10} gr per dscf) (TEQ) corrected to seven percent oxygen, when the average of the performance test run average temperatures at the inlet to the particulate matter control device is 204 EC (400 EF) or less.
- b. Pursuant to §63.1344(a), a kiln subject to the D/F limitation under §63.1343 must operate the kiln such that the temperature of the gas at the inlet to the kiln particulate matter control device (PMCD) and alkali bypass PMCD, if applicable, does not exceed the applicable temperature limit specified in paragraph (b) of this section.
- c. Pursuant to §63.1344(b), the temperature limit for affected sources meeting the limits of paragraph (a) of this section or paragraphs (a)(1) through (a)(3) of this section is determined in accordance with §63.149(b)(3)(iv).

Standards for Clinker Coolers

- d. Pursuant to §63.1345(a), the permittee shall not cause to be discharged into the atmosphere from any clinker cooler any gases which:
- i. Contain particulate matter in excess of 0.050 kg per Mg (0.10 lb per ton) of feed (dry basis) to the kiln.
 - ii. Exhibit opacity greater than 10 percent.

Standards for Raw and Finish Mills

- e. Pursuant to §63.1347, the permittee shall not cause to be discharged from the mill sweep or air separator air pollution control devices for each finish mill any gases which exhibit opacity in excess of ten percent.

Standards for affected sources other than kilns; in-line kilns/raw mills; new and reconstructed raw material dryers; and raw and finish mills

- f. Pursuant to §63.1348, the owner or operator of each new or existing raw material, clinker or finished product storage bin; conveying system transfer point; bagging system; and bulk loading or unloading system; and each existing raw material dryer, at a facility which is a major source subject to the provision of this subpart shall not

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cause to be discharged any gases from these affected sources which exhibit opacity in excess of ten percent.

Performance testing requirements

- g. Pursuant to §63.1349, the permittee shall use the test methods and procedures contained in this section to demonstrate compliance with the emissions limits set forth by this subpart.

Monitoring requirements

- h. Pursuant to §63.1350, the owner or operator of each portland cement plant shall prepare for each affected source subject to the provisions of this subpart, a written operations and maintenance plan. The permittee shall also comply with all applicable monitoring requirements contained in this section.

Compliance dates

- i. Pursuant to §63.1351(a), existing sources shall comply with this subpart no later than June 14, 2002.
- j. Pursuant to §63.1351(b), the compliance date for new construction or reconstruction after March 24, 1998 is immediately upon start of operations.

Reporting requirements

- k. Pursuant to §63.1353(a), the permittee shall comply with all applicable notification requirements set forth in this section.

Reporting Requirements

- l. Pursuant to §63.1354(a), the permittee shall comply with all applicable reporting requirements set forth in this section.

Recordkeeping Requirements

- m. Pursuant to §63.1355(a), the permittee shall comply with all applicable recordkeeping requirements set forth in this section.
224. Pursuant to §19.304 and 40 CFR 63.6(e)(3)(i), the facility shall develop and implement a written startup, shutdown, and malfunction plan for sources subject to 40 CFR 63, Subpart EEE, *National Emission Standards for Hazardous Air Pollutants From*

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Hazardous Waste Combustors. The plan shall include those items listed in 40 CFR 63.6(e)(3) et seq. The plan shall be maintained on site and be available to Department personnel upon request.

225. Pursuant to §19.304 and 40 CFR 63.6(e)(3)(i), the facility shall develop and implement a written startup, shutdown, and malfunction plan for sources subject to 40 CFR 63, Subpart LLL, *National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry*. The plan shall include those items listed in 40 CFR 63.6(e)(3) et seq. The plan shall be maintained on site and be available to Department personnel upon request.
226. Pursuant to §18.1004 of Regulation 18, 40 CFR Part 63, Subpart LLL and A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, the visible emission observations shall be used as a method of compliance verification for the opacity limits assigned for the sources whose Specific Conditions reference this Plantwide Condition. The monthly observations shall be conducted by someone familiar with the facility's visible emissions. If during the observations, visible emissions are detected which appear to be in excess of the permitted opacity limit, the permittee shall:
- a. Take immediate action to identify the cause of the visible emissions,
 - b. Implement corrective action, and
 - c. If excessive visible emissions are still detected, an opacity reading shall be conducted in accordance with EPA Reference Method 9. This reading shall be conducted by a person trained and certified in the reference method. If the opacity reading exceeds the permitted limit, further corrective measures shall be taken.
 - d. If no excessive visible emissions are detected, the incident shall be noted in the records as described below.

The permittee shall maintain records related to all visible emission observations and Method 9 readings. These records shall be updated on an as-performed basis. These records shall be kept on site and made available to Department personnel upon request. These records shall contain:

- a. The time and date of each observation/reading any observance of visible emissions appearing to be above permitted limits or any Method 9 reading which indicates exceedance,
- b. The cause of any observed exceedance of opacity limits, corrective actions taken, and results of the reassessment, and
- c. The name of the person conducting the observation/reading.

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227. Pursuant to §19.304 of Regulation 19, and 40 CFR Part 63, Subpart EEE, §63.1206(b)(1), the permittee may choose to comply with the emission standards set forth in 40 CFR part 63, Subpart LLL when hazardous waste is not in the combustion chamber (i.e., the hazardous waste feed to the combustor has been cutoff for a period time not less than the hazardous waste residence time). The permittee must document in the facility record when they are operating under 40 CFR 63, Subpart LLL. These records shall be maintained on site and made available to Department personnel upon request.

Title VI Provisions

228. The permittee shall comply with the standards for labeling of products using ozone depleting substances pursuant to 40 CFR Part 82, Subpart E:
- a. All containers containing a class I or class II substance stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced to interstate commerce pursuant to §82.106.
 - b. The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c. The form of the label bearing the required warning must comply with the requirements pursuant to §82.110.
 - d. No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
229. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B:
- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b. 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.
 - c. Persons performing maintenance, service repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.

- d. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152.)
 - e. Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to §82.156.
 - f. 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.
230. If the permittee manufactures, transforms, destroys, imports, or exports a class I or class II substance, the permittee is subject to all requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
231. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.
- 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.
232. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program.

Permit Shield

233. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements, as of the date of permit issuance, included in and specifically identified in item A of this condition:
- A. The following have been specifically identified as applicable requirements based upon information submitted by the permittee in an application dated October 1996, as amended in September 1997, December 1998, April 1999, and October 2000.

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| Source No. | Regulation | Description |
|--|--|---|
| F19, F20 | 40 CFR 60, Subpart Kb | Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984 |
| P1, P2, P3 | 40 CFR 63, Subpart EEE | Emission Standards for Hazardous Waste Combustors |
| P5, P6, P8, P10, P11, P12, P13, P15, P16, P17, P18, P19, P20, P26, P27, P28, P29, P30, P31, M1, M3, M4, M8, M9, M10, M11, M12, M13, M14, M15, M16, M17, M18, M19, M20, M21, M22, M23, M24, M25, M26, M27, M28, M29, M30, M31, M32, M33, M34, M35, M36, M37, M38, M39, M40, M42, M43, M44, M45, S1, S3-S13, C1-C11, C13-C21, C26-C28, C32-C37, C41-C44 | 40 CFR 63, Subpart LLL | Emission Standards for Portland Cement Plants |
| F19, F20 Facility | 40 CFR 61, Subpart FF 40 CFR 63, Subpart DD | Benzene Waste Operations |
| Facility | Arkansas Regulation 19 | Compilation of Regulations of the Arkansas State Implementation Plan for Air Pollution Control |
| Facility | Arkansas Regulation 26 | Regulations of the Arkansas Operating |

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| | | Air Permit Program |
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- B. The following requirements have been specifically identified as not applicable, based upon information submitted by the permittee in an application dated October 1996, as amended September 1997, December 1998, and April 1999.

| Description of Regulation | Regulatory Citation | Affected Source | Basis for Determination |
|--|----------------------------|---|--|
| New Source Performance Standards | 40 CFR 60, Subpart F | P1, P2, P3, P6, M16, M17, M18, M19, M20, M42, M43, M44, S4, S6, S7, S8, S9, S10, S11, S12, S13, C13, C14, C18 | Units were constructed prior to the effective date of the subpart |
| New Source Performance Standards | 40 CFR 60, Subpart Y | P4, P7, P9, P24 | Final Direct Rule (April 5, 2002) [FR-7168-1] |
| New Source Performance Standards | 40 CFR 60, Subpart OOO | Facility | Sources installed before applicability date or subject to Subpart F are exempt from OOO. |
| National Emission Standards for Hazardous Air Pollutants | 40 CFR 61, Subpart DD | Facility | Facility subject to FF exempt from requirements of this subpart. |

- C. Nothing shall alter or affect the following:

Provisions of Section 303 of the Clean Air Act;

The liability of an owner or operator for any violation of applicable requirements prior to or at the time of permit issuance;

The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; or

The ability of the EPA to obtain information under Section 114 of the Clean Air Act.

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SECTION VII: INSIGNIFICANT ACTIVITIES

Pursuant to §26.304 of Regulation 26, the following sources are insignificant activities. Any activity for which a state or federal applicable requirement applies is not insignificant even if this activity meets the criteria of §304 of Regulation 26 or is listed below. Insignificant activity determinations rely upon the information submitted by the permittee in an application dated October 30, 2000.

| Description | Category |
|--------------------------------|--------------|
| Piles associated with clean-up | Group A, #13 |
| Auxiliary drive to turn kilns | Group A, #13 |
| 11,000 gallon oil tank | Group A, #13 |
| 11,000 gallon oil tank | Group A, #13 |
| 250 gallon fuel tank | Group A, #2 |
| 10,000 gallon diesel UST | Group A, #3 |
| 10,000 gallon unleaded UST | Group A, #13 |
| 8,000 diesel tank | Group A, #3 |
| 600 gallon tank | Group A, #3 |

Pursuant to §26.304 of Regulation 26, the emission units, operations, or activities contained in Regulation 19, Appendix A, Group B, have been determined by the Department to be insignificant activities. Activities included in this list are allowable under this permit and need not be specifically identified.

SECTION VIII: GENERAL PROVISIONS

1. Pursuant to 40 CFR 70.6(b)(2), any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the sole origin of and authority for the terms or conditions are not required under the Clean Air Act or any of its applicable requirements, and are not federally enforceable under the Clean Air Act. Arkansas Pollution Control & Ecology Commission Regulation 18 was adopted pursuant to the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*). Any terms or conditions included in this permit which specify and reference Arkansas Pollution Control & Ecology Commission Regulation 18 or the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) as the origin of and authority for the terms or conditions are enforceable under this Arkansas statute.
2. Pursuant to 40 CFR 70.6(a)(2) and §26.7 of the Regulations of the Arkansas Operating Air Permit Program (Regulation 26), this permit shall be valid for a period of five (5) years beginning on the date this permit becomes effective and ending five (5) years later.
3. Pursuant to §26.4 of Regulation #26, it is the duty of the permittee to submit a complete application for permit renewal at least six (6) months prior to the date of permit expiration. Permit expiration terminates the permittee's right to operate unless a complete renewal application was submitted at least six (6) months prior to permit expiration, in which case the existing permit shall remain in effect until the Department takes final action on the renewal application. The Department will not necessarily notify the permittee when the permit renewal application is due.
4. Pursuant to 40 CFR 70.6(a)(1)(ii) and §26.7 of Regulation #26, where an applicable requirement of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq* (Act) is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, both provisions are incorporated into the permit and shall be enforceable by the Director or Administrator.
5. Pursuant to 40 CFR 70.6(a)(3)(ii)(A) and §26.7 of Regulation #26, records of monitoring information required by this permit shall include the following:
 - i. The date, place as defined in this permit, and time of sampling or measurements;
 - ii. The date(s) analyses were performed;
 - iii. The company or entity that performed the analyses;
 - iv. The analytical techniques or methods used;
 - v. The results of such analyses; and

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- vi. The operating conditions existing at the time of sampling or measurement.
- 6. Pursuant to 40 CFR 70.6(a)(3)(ii)(B) and §26.7 of Regulation #26, records of all required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.
- 7. Pursuant to 40 CFR 70.6(a)(3)(iii)(A) and §26.7 of Regulation #26, the permittee shall submit reports of all required monitoring every 6 months. If no other reporting period has been established, the reporting period shall end on the last day of the anniversary month of this permit. The report shall be due within 30 days of the end of the reporting period. Even though the reports are due every six months, each report shall contain a full year of data. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official as defined in §26.2 of Regulation #26 and must be sent to the address below.

Arkansas Department of Environmental Quality
Air Division
ATTN: Compliance Inspector Supervisor
Post Office Box 8913
Little Rock, AR 72219

- 8. Pursuant to 40 CFR 70.6(a)(3)(iii)(B), §26.7 of Regulation #26, and §19.601 and 19.602 of Regulation #19, all deviations from permit requirements, including those attributable to upset conditions as defined in the permit shall be reported to the Department. An initial report shall be made to the Department by the next business day after the occurrence. The initial report may be made by telephone and shall include:
 - i. The facility name and location,
 - ii. The process unit or emission source which is deviating from the permit limit,
 - iii. The permit limit, including the identification of pollutants, from which deviation occurs,
 - iv. The date and time the deviation started,
 - v. The duration of the deviation,
 - vi. The average emissions during the deviation,
 - vii. The probable cause of such deviations,
 - viii. Any corrective actions or preventive measures taken or being taken to prevent such deviations in the future, and
 - ix. The name of the person submitting the report.

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A full report shall be made in writing to the Department within five (5) business days of discovery of the occurrence and shall include in addition to the information required by initial report a schedule of actions to be taken to eliminate future occurrences and/or to minimize the amount by which the permits limits are exceeded and to reduce the length of time for which said limits are exceeded. If the permittee wishes, they may submit a full report in writing (by facsimile, overnight courier, or other means) by the next business day after discovery of the occurrence and such report will serve as both the initial report and full report.

9. Pursuant to 40 CFR 70.6(a)(5) and §26.7 of Regulation #26, and A.C.A. §8-4-203, as referenced by §8-4-304 and §8-4-311, if any provision of the permit or the application thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications hereof which can be given effect without the invalid provision or application, and to this end, provisions of this Regulation are declared to be separable and severable.
10. Pursuant to 40 CFR 70.6(a)(6)(i) and §26.7 of Regulation #26, the permittee must comply with all conditions of this Part 70 permit. Any permit noncompliance with applicable requirements as defined in Regulation #26 constitutes a violation of the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.* and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any permit noncompliance with a state requirement constitutes a violation of the Arkansas Water and Air Pollution Control Act (A.C.A. §8-4-101 *et seq.*) and is also grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
11. Pursuant to 40 CFR 70.6(a)(6)(ii) and §26.7 of Regulation #26, 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 this permit.
12. Pursuant to 40 CFR 70.6(a)(6)(iii) and §26.7 of Regulation #26, this permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
13. Pursuant to 40 CFR 70.6(a)(6)(iv) and §26.7 of Regulation #26, this permit does not convey any property rights of any sort, or any exclusive privilege.
14. Pursuant to 40 CFR 70.6(a)(6)(v) and §26.7 of Regulation #26, the permittee shall furnish to the Director, within the time specified by the Director, any information that the Director may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the

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permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the permittee may be required to furnish such records directly to the Administrator along with a claim of confidentiality.

15. Pursuant to 40 CFR 70.6(a)(7) and §26.7 of Regulation #26, the permittee shall pay all permit fees in accordance with the procedures established in Regulation #9.
16. Pursuant to 40 CFR 70.6(a)(8) and §26.7 of Regulation #26, no permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for elsewhere in this permit.
17. Pursuant to 40 CFR 70.6(a)(9)(i) and §26.7 of Regulation #26, if the permittee is allowed to operate under different operating scenarios, the permittee shall, contemporaneously with making a change from one operating scenario to another, record in a log at the permitted facility a record of the scenario under which the facility or source is operating.
18. Pursuant to 40 CFR 70.6(b) and §26.7 of Regulation #26, all terms and conditions in this permit, including any provisions designed to limit a source's potential to emit, are enforceable by the Administrator and citizens under the Act unless the Department has specifically designated as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.
19. Pursuant to 40 CFR 70.6(c)(1) and §26.7 of Regulation #26, any document (including reports) required by this permit shall contain a certification by a responsible official as defined in §26.2 of Regulation #26.
20. Pursuant to 40 CFR 70.6(c)(2) and §26.7 of Regulation #26, the permittee shall allow an authorized representative of the Department, upon presentation of credentials, to perform the following:
 - i. Enter upon the permittee's premises where the permitted source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements.

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21. Pursuant to 40 CFR 70.6(c)(5) and §26.7 of Regulation #26, the permittee shall submit a compliance certification with terms and conditions contained in the permit, including emission limitations, standards, or work practices. This compliance certification shall be submitted annually and shall be submitted to the Administrator as well as to the Department. All compliance certifications required by this permit shall include the following:
 - i. The identification of each term or condition of the permit that is the basis of the certification;
 - ii. The compliance status;
 - iii. Whether compliance was continuous or intermittent;
 - iv. The method(s) used for determining the compliance status of the source, currently and over the reporting period established by the monitoring requirements of this permit; and
 - v. Such other facts as the Department may require elsewhere in this permit or by §114(a)(3) and 504(b) of the Act.
22. Pursuant to §26.7 of Regulation #26, nothing in this permit shall alter or affect the following:
 - i. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section;
 - ii. The liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with §408(a) of the Act; or
 - iv. The ability of EPA to obtain information from a source pursuant to §114 of the Act.
23. Pursuant to A.C.A. §8-4-203 as referenced by §8-4-304 and §8-4-311, this permit authorizes only those pollutant emitting activities addressed herein.

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX I

Request for PDS InvoiceInvoice Number
(assigned when invoice printed)

PDS-

| | | | | |
|--|--------------------------|---------|-------------------|--|
| AFIN r | 41-00001 | | | |
| Name <i>(for confirmation only)</i> | Ash Grove Cement Company | | | |
| Invoice Type (pick one) r | Initial | Mod X | Variance | |
| | Annual | Renewal | Interim Authority | |
| Permit Number r | 75-AOP-R1 | | | |
| Media Code r | A | | | |
| Fee Code or Pmt Typer | T5 | | | |
| Fee Description <i>(for confirmation only)</i> | Title V | | | |
| Amount Due r <i>(whole dollar amount only)</i> | \$500 | | | |
| Printed Comment <i>(600 characters maximum)</i> | | | | |

Note: The information below is for use by the requesting division if desired; it will not print on the invoice.

Engineer

Paid? (yes/no)

Check number

Comments

r **Required data**(See "g:\Misc\PDS_FeeCodes.wpd" for descriptions and discussions of fee codes)

| | |
|-----------------------|-------|
| Request submitted by: | Date: |
|-----------------------|-------|

Public Notice

Pursuant to the Arkansas Operating Air Permit Program (Regulation #26) Section 602, the Air Division of the Arkansas Department of Environmental Quality gives the following notice:

This modification will allow Ash Grove to construct a new cement kiln dust (CKD) handling system(SN-P32,SN- P33, SN-P34, SN-P35 and SN-P36). This system will allow the CKD to be pneumatically conveyed across the highway to a new CKD landfill and it will also allow some of the CKD to be recycled to kiln #3. This modification will result in PM/PM₁₀ emissions increases of 1.2 lb/hr and 4.0 tpy from the CKD handling equipment and 4 proposed new fabric filter dust collectors. Also, Ash Grove proposes to construct a baghouse (SN-C44). This change will result in an increase of PM/PM₁₀ emissions of 0.17 lb/hr and 0.75 tpy. Finally, Ash Grove Cement Company will add 3 drag conveyors and replace 2 bucket conveyors and a belt conveyor that are part of the clinker handling system. The two bucket conveyors are the number 6 and number 7 bucket conveyors. The belt conveyor is the 440 belt. These conveyors are subject to all applicable sections of 40 CFR 63, Subpart LLL. No additional emissions are expected to result from this modification.

The application has been reviewed by the staff of the Department and has received the Department's tentative approval subject to the terms of this notice.

Citizens wishing to examine the permit application and staff findings and recommendations may do so by contacting Doug Szenher, Public Affairs Supervisor. Citizens desiring technical information concerning the application or permit should contact Wesley Crouch, Engineer. Both Doug Szenher and Wesley Crouch can be reached at the Department's central office, 8001 National Drive, Little Rock, Arkansas 72209, telephone: (501) 682-0744.

The draft permit and permit application are available for copying at the above address. A copy of the draft permit has also been placed at the Texarkana Public Library located at 600 W. Third Street, Texarkana, TX 75501. This information may be reviewed during normal business hours.

Interested or affected persons may also submit written comments or request a hearing on the proposal, or the proposed modification, to the Department at the above address - Attention: Doug Szenher. In order to be considered, the comments must be submitted within thirty (30) days of publication of this notice. Although the Department is not proposing to conduct a public hearing, one will be scheduled if significant comments on the permit provisions are received. If a hearing is scheduled, adequate public notice will be given in the newspaper of largest circulation in the county in which the facility in question is, or will be, located.

The Director shall make a final decision to issue or deny this application or to impose special conditions in accordance with Section 2.1 of the Arkansas Pollution Control and Ecology Commission's Administrative Procedures (Regulation #8) and Regulation #26.

Dated this

Marcus C. Devine
Director