

STATEMENT OF BASIS

For the issuance of Draft Air Permit # 0075-AOP-R23 AFIN: 41-00001

1. PERMITTING AUTHORITY:

Division of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

2. APPLICANT:

Ash Grove Cement Company
4343 Highway 108
Foreman, Arkansas 71836

3. PERMIT WRITER:

Andrea Sandage

4. NAICS DESCRIPTION AND CODE:

NAICS Description: Cement Manufacturing
NAICS Code: 327310

5. ALL SUBMITTALS:

The following is a list of ALL permit applications included in this permit revision.

Date of Application	Type of Application (New, Renewal, Modification, Deminimis/Minor Mod, or Administrative Amendment)	Short Description of Any Changes That Would Be Considered New or Modified Emissions
11/10/2020	Minor Mod	Added SN-111.P2, SN-111.T14, SN-40F.FT11

6. REVIEWER'S NOTES:

Ash Grove Cement Company (AFIN: 41-00001) operates a portland cement plant located at 4457 Hwy 108 West in Foreman, Arkansas 71836. Ash Grove submitted a Minor Modification to add a new South Limestone Storage Pile (SN-111.P2) and the material transfer points for the limestone pile (SN-111.T14). The modification also adds a new Liquid Waste Derived Fuels (LWDF) storage tank (SN-40F.FT11) and removes a gypsum storage pile (SN-41A.P6). The process description, Specific Conditions WDF-5, WDF-9 and HR-3 were also revised.

The added storage pile and tank will be used for flexibility in storage and product mixing. The facility is not increasing the downstream throughput. The revised process description includes the removal of the PUG mill which is no longer used.

The total annual emission increases include 0.7 tpy PM and 0.2 tpy PM₁₀.

7. COMPLIANCE STATUS:

The following summarizes the current compliance of the facility including active/pending enforcement actions and recent compliance activities and issues.

This facility was inspected September 17, 2020 with no violation identified.

8. PSD/GHG APPLICABILITY:

a) Did the facility undergo PSD review in this permit (i.e., BACT, Modeling, etc.)? **N**

b) Is the facility categorized as a major source for PSD? **Y**

- *Single pollutant ≥ 100 tpy and on the list of 28 or single pollutant ≥ 250 tpy and not on list*

If yes for 8(b), explain why this permit modification is not PSD.

The facility did not undergo a PSD review for PM and PM₁₀ since the increase was below significant levels.

9. SOURCE AND POLLUTANT SPECIFIC REGULATORY APPLICABILITY:

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
326.CH22,326.CH26, 403.CHM 403.CHR, 403.CHU 443.CH56, 443.CH46, 449.BF10, 449.BF15, 449.BF20, 449.BF30, 449.BF40, 449.BF50, 449.BF60, 449.BF70, 449.CH30, 449.CH31, 449.CH32, 449.CH33, 449.CH42 449.HP2, 449.HP4, 449.T7, 449.T8, 533.LS10, 534.CH12, 514.BF1, 514.BF2, 514.BF3, 524.BF1, 524.BF2, 611.BF1, 611.BF3, 611.BF4, 611.BF10, 611.BF20, 611.BF30, 611.BF40, 403.BF3, 403.BF4, 403.BF6, 403.BF7, 403.BF8, 612.BF1, 612.BF2, 612.BF3, 612.BF4, 612.BF5, 621.BF1, 621.BF2, 621.BF3, 621.BF5, 621.BF6(E), 621.BF7(W), 621.BF8, 621.BF9, 631.BF10, 631.BF15, 631.BF20, 631.BF25, 631.BF30, 513.BF1, 521.BF1, 521.BF2, 523.BF2, 531.BF10, 531.BF20, 533.BF10, 533.BF20, 534.BF10, 534.BF20, 535.BF10, 535.BF20, 44C.BF10, 44M.BF10, 409.BF10, 442.BF10, 442.BF20, 443.BF20, 449, BF31, 327.BF10, 327.BF20, 327.BF30, 442.BF10, 442.BF20, 443.BF20, 311.CHA, 326.BF10, 326.BF30, 329.BF10, 329.BF20, 611.UL10	PM ₁₀	NESHAP Subpart LLL
41A.BF10, 41A.BF20, 41A.T2, 41A.T10, 44A.T10, 44A.BF10, 44B.BF10	PM ₁₀	NSPS Subpart Y
41A.BF10, 41A.BF20, 44A.BF10, 213.BF10, 213.BF20, 213.T2, 213.T3, 221.BF10, 323.BF10, 325.BF10, 325.BF20, 325.BF30, 41A.T1, 111.T10, 111.T12, 111.T13, 111.T14, 213.T1, 221.CH01, 221.RMB1, 221.T1, 321.CH01, 323.T1, 41A.BF10, 41A.BF20, 44A.BF10	PM ₁₀	NSPS Subpart OOO
41F.FT10, 40F.FT3, 40F.FT4, 40F.FT5, 40F.FT6, 40F.FT7, 40F.FT8, 40F.FT9, 40F.FTA, 40F.FT11	VOC	NSPS Subpart Kb
41F.FT10, 40F.FT3, 40F.FT4, 40F.FT5, 40F.FT6, 40F.FT7, 40F.FT8, 40F.FT9, 40F.FTA, 40F.TX1, 45F.TX10, 40F.FT11	Benzene Waste Operations	40 CFR Part 61, Subpart FF

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
41F.FT10, 40F.FT3, 40F.FT4, 40F.FT5, 40F.FT6, 40F.FT7, 40F.FT8, 40F.FT9, 40F.FTA, 40F.TX1, 45F.TX10, RCC, 40F.FT11	Benzene Waste Operations	40 CFR 63, Subpart DD
443.BF10, 443.BF30, 443.SK10	HAPs and THC	NESHAP Subpart EEE
710-EG10	Varies	NSPS Subpart IIII
Facility	Varies	NESHAP Subpart G
		NESHAP Subpart XX

10. UNCONSTRUCTED SOURCES:

Unconstructed Source	Permit Approval Date	Extension Requested Date	Extension Approval Date	If Greater than 18 Months without Approval, List Reason for Continued Inclusion in Permit
SN-111.P2 SN-40F.FT11	Minor Mod 11-18-20			

11. PERMIT SHIELD – TITLE V PERMITS ONLY:

Did the facility request a permit shield in this application? **N**

(Note - permit shields are not allowed to be added, but existing ones can remain, for minor modification applications or any Regulation 18 requirement.)

12. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

13. AMBIENT AIR EVALUATIONS:

The following are results for ambient air evaluations or modeling.

a) NAAQS

A NAAQS evaluation is not required under the Arkansas State Implementation Plan, National Ambient Air Quality Standards, Infrastructure SIPs and NAAQS SIP per Ark. Code Ann. § 8-4-318, dated March 2017 and the DEQ Air Permit Screening Modeling Instructions.

b) Non-Criteria Pollutants:

This facility is subject to 40 CFR 63, Subpart EEE. This subpart requires a risk assessment to be performed and no threat to the public health or safety was found.

14. CALCULATIONS:

SN	Emission Factor Source	Emission Factor	Control Equipment	Control Equipment Efficiency	Comments
Kiln	Testing BACT	Various VOC: 44.5 lb/hr	Baghouse	99%	
	EPA Consent Decree	lb/ton: 1.5 NO _x 0.6 SO ₂ 0.086 PM/PM ₁₀	SNCR for NO _x	--	30-day rolling average emission limits
Fabric filters	Various	0.01 gr/dscf or 0.005 gr/dscf		95%	
Combustion sources	AP-42	Various			Based on equation in AP-42
Crushers	AP-42	Various			based on equation in AP-42
Roads	AP-42	Various			based on equation in AP-42
Storage piles	AP-42	Various			based on equation in AP-42
45F.TX10	AP-42 Chapter 5.2, Equation 1 And Chapter 7.1, equation 4.4	Various VOC: 0.7 lb/hr	RTO	95%	
40F.TX1	AP-42 1.4-2, 13.5-1, 13.5-2	lb/MMBtu VOC – 0.66 NO _x – 0.068 CO – 0.31 lb/MMft ³ PM/PM ₁₀ – 7.6 SO ₂ – 0.6	TO	95%	6.5 MMBtu/hr (0.0065 MMBtu/hr)

15. TESTING REQUIREMENTS:

The permit requires testing of the following sources.

SN	Pollutants	Test Method	Test Interval	Justification
443.SK10	All	See NESHAP EEE		
443.SK10	Methane	18 with 25A or 25A with Methane cutter	Quarterly	To verify the methane portion of emission from 443.SK10
443.SK10	PM (Condensables)	202	Once every five years	§26.703(A)
HR07, HR15, HR17 - HR22, 111.R1A-F	Silt content of roads to verify PM ₁₀	Appendix C.1 and C.2 of AP-42	Quarterly until each road segment has been tested twice.	§26.703(A)
HR01 - HR06, HR12 - HR14, HR16, HR23	Road surface silt loading to verify PM ₁₀			

16. MONITORING OR CEMS:

The permittee must monitor the following parameters with CEMS or other monitoring equipment (temperature, pressure differential, etc.)

SN	Parameter or Pollutant to be Monitored	Method (CEM, Pressure Gauge, etc.)	Frequency	Report (Y/N)
443.SK10	CO	CEM	Continuously	Y
	VOC	THC Analyzer (CEM)	Continuously	Y
	NO _x	CEM	Continuously	Y
	SO ₂	CEM	Continuously	Y
40F.TX1 & 41F.TX10	Combustion chamber temperature	Continuous temperature recorder	Continuously	N
45F.TX10	Combustion chamber temperature	Continuous temperature recorder	Continuously	N

17. RECORDKEEPING REQUIREMENTS:

The following are items (such as throughput, fuel usage, VOC content, etc.) that must be tracked and recorded.

SN	Recorded Item	Permit Limit	Frequency	Report (Y/N)
443.SK10 & Plantwide	Clinker production	5,300 tons/day	Daily	Y
443.SK10	Daily clinker production	Tons per hour	Hourly	N
	Operating Parameter Limits	See Appendix N	Daily	Y
403.P1	Pile area	20 acres	Annually	Y
449.P1	Pile area	4 acres	Annually	Y
213.P2	Pile area	22,500 ft ²	Annually	Y
41.AP1, 41.AP2, & 41.AP3	Pile area	0.92 acres (total)	Annually	Y
41A.P5	Pile area	1.03 acres	Annually	Y
221.RMB1	Pile area	4.93 acres	Annually	Y
111.P1	Pile area	17,500 ft ²	Annually	Y
111.P2	Pile area	24,000 ft ²	Annually	Y
710.EG10	Operating Hours	500 hours per consecutive 12-month period	As Necessary	Y
40F.TX1	Combustion chamber temperature	≥ 1500°F	Continuously	N
	Breakthrough indicators	Log of observations	Good engineering judgment	N
45F.TX10	Combustion chamber temperature	≥ 1425°F	Continuously	N
449.CR10	Fuel oil sulfur content	Not to exceed 0.05%	Each fuel shipment received	N

18. OPACITY:

SN	Opacity	Justification for limit	Compliance Mechanism
443.BF10, 443.BF30, & 443.SK10	20	NESHAP Subpart EEE	Weekly observation

SN	Opacity	Justification for limit	Compliance Mechanism
326.BF10, 326.BF30, 326.CH26, 327.BF10, 327.BF20, 329.BF10, 329.BF20, 403.CHM, 403.CHR, 403.CHU, 431.LS12, 442.BF20, 443.BF20, 443.CH46, 449.CH30, 449.CH31, 449.CH32, 449.CH33, 449.CH42, 449.HP2, 449.T7, 449.T8, 533.LS10, 534.CH12, M9, 514.BF1, 514.BF2, 514.BF3, 524.BF1, 524.BF2, 611.BF1, 611.BF3, 611.BF4, 611.BF10, 611.BF20, 611.BF30, 611.BF40, 611.UL10, 403.BF3, 403.BF4, 403.BF6, 403.BF7, 403.BF8, 612.BF1, 612.BF2, 612.BF3, 612.BF4, 612.BF5, 621.BF1, 621.BF2, 621.BF3, 621.BF5, 621.BF6(E), 621.BF7(W), 621.BF8, 621.BF9, 631.BF10, 631.BF15, 631.BF20, 631.BF25, 631.BF30, 409.BF10, 449.BF10, 449.BF15, 449.BF20, 449.BF30, 449.BF31, 449.BF40, 449.BF50, 449.BF60, 449.BF70, 513.BF1, 521.BF1, 521.BF2, 523.BF2, 531.BF10, 531.BF20, 533.BF10, 533.BF20, 534.BF10, 534.BF20, 535.BF10, 535.BF20, 44C.BF10, 44M.BF10, 327.BF30, 442.BF10	10	NESHAP Subpart LLL	Monthly observation
40F.TX1 & 45F.TX10	10	Department Guidance	Natural gas only
41A.BF10, 41A.BF20, 41A.T2, 41A.T10, 44A.T10, 44A.BF10, 44B.BF10	10	NSPS Subpart Y	Weekly observation

SN	Opacity	Justification for limit	Compliance Mechanism
41A.BF10, 41A.BF20, 44A.BF10, 213.BF10, 213.BF20, 213.T2, 213.T3, 221.BF10, 323.BF10, 325.BF10, 325.BF20, 325.BF30, 41A.T1, 111.T10, 111.T12, 111.T13, 111.T14, 213.T1, 221.CH01, 221.RMB1, 221.T1, 321.CH01, 323.T1	Various	NSPS Subpart OOO	Weekly observation
403.P1, 449.P1, 41A.P1, 41A.P2, 41A.P3, 41A.P5, 211.BF1, 213.P2, 311.BF1, 311.CH10, 311.CH11, 311, CH15, 311.CH16, 403.T2, 449.CR10, 449.T4, 111.P1, 111.P2	20	Department Guidance	Weekly observation
311.CH1, 311.CHC	40	Department Guidance	Weekly observation

19. DELETED CONDITIONS:

Former SC	Justification for removal
PILE-8, PILE-9	Removed Gypsum Storage Pile (SN-41A.P6)

20. GROUP A INSIGNIFICANT ACTIVITIES:

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
500 gal grinding aid tank	A-3	See A-3 total.						
1000 gal grinding aid tank	A-3							
<15 gal DOT containers	A-3							
10,000 gal diesel storage tank – vendor x 2	A-3							
10,000 gal diesel UST x 3	A-3							
10,000 gal Masonry air entraining agent tank	A-3							

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
1,000 gal used oil UST	A-3							
550 gal motor oil and/or hydraulic fluid UST x 3	A-3							
350 gal used oil tanks x 2	A-3							
Total	A-3			4.91			4.91	4.91
Cadence Lab Vents	A-5			0.007			0.007	0.007
Piles associated with clean-up	A-13							
10,000 gallon oil tank	A-13							
12,000 gallon grinding aid tank	A-13							
10,000 gallon unleaded UST	A-13							
30,000 gallon grinding aid tank	A-13							
Total	A-13	4.92		4.37			0.88	0.88

21. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

The following is a list of all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0075-AOP-R22

APPENDIX A – EMISSION CHANGES AND FEE CALCULATION

Fee Calculation for Major Source

Revised 03-11-16

Facility Name: Ash Grove Cement Company
 Permit Number: 0075-AOP-R23
 AFIN: 41-00001

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	6990.66
Permit Type	Minor Mod	Permit Fee \$	500

Minor Modification Fee \$	500
Minimum Modification Fee \$	1000
Renewal with Minor Modification \$	500
Check if Facility Holds an Active Minor Source or Minor Source General Permit	<input type="checkbox"/>
If Hold Active Permit, Amt of Last Annual Air Permit Invoice \$	0
Total Permit Fee Chargeable Emissions (tpy)	0.2
Initial Title V Permit Fee Chargeable Emissions (tpy)	

HAPs not included in VOC or PM: Chlorine, Hydrazine, HCl, HF, Methyl Chloroform, Methylene Chloride, Phosphine, Tetrachloroethylene, Titanium Tetrachloride

Air Contaminants: All air contaminants are chargeable unless they are included in other totals (e.g., H2SO4 in condensable PM, H2S in TRS, etc.)

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
PM		325.1	325.8	0.7		
PM ₁₀		658.3	658.5	0.2	0.2	658.5
PM _{2.5}		0	0	0		
SO ₂		2701.6	2701.6	0	0	2701.6
VOC		239.1	239.1	0	0	239.1
CO		1729.6	1729.6	0		
NO _x		2980.1	2980.1	0	0	2980.1
1. (The following HAPs are bubbled together)	<input type="checkbox"/>	0	0	0		
1,1,1-Trichloroethane*	<input type="checkbox"/>	195.94	195.94	0		
1,1,2,2-Tetrachloroethane*	<input type="checkbox"/>	0	0	0		
1,1,2-Trichloroethane*	<input type="checkbox"/>	0	0	0		
1,1-Dichloroethane*	<input type="checkbox"/>	0	0	0		
1,2-Dichloroethane*	<input type="checkbox"/>	0	0	0		
1,2-Dichloropropane*	<input type="checkbox"/>	0	0	0		
Acrylonitrile*	<input type="checkbox"/>	0	0	0		
Allyl Chloride*	<input type="checkbox"/>	0	0	0		
Benzene*	<input type="checkbox"/>	0	0	0		
Bromoform*	<input type="checkbox"/>	0	0	0		
Bromomethane*	<input type="checkbox"/>	0	0	0		
Carbon disulfide*	<input type="checkbox"/>	0	0	0		
Carbon tetrachloride*	<input type="checkbox"/>	0	0	0		
Chlorobenzene*	<input type="checkbox"/>	0	0	0		
Chloroform*	<input type="checkbox"/>	0	0	0		
Chloromethane*	<input type="checkbox"/>	0	0	0		
Cumene*	<input type="checkbox"/>	0	0	0		
Diethanolamine*	<input type="checkbox"/>	0	0	0		
Ethyl Acrylate*	<input type="checkbox"/>	0	0	0		
Ethylbenzene*	<input type="checkbox"/>	0	0	0		
Ethylene Glycol*	<input type="checkbox"/>	0	0	0		
Iodomethane*	<input type="checkbox"/>	0	0	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Methyl Methacrylate*	<input type="checkbox"/>	0	0	0		
Methyl tert-butyl ether*	<input type="checkbox"/>	0	0	0		
Methylene chloride*	<input type="checkbox"/>	0	0	0		
n-Hexane*	<input type="checkbox"/>	0	0	0		
Styrene*	<input type="checkbox"/>	0	0	0		
Toluene*	<input type="checkbox"/>	0	0	0		
trans-1,3-Dichloropropene*	<input type="checkbox"/>	0	0	0		
Vinyl acetate*	<input type="checkbox"/>	0	0	0		
Vinyl Bromide*	<input type="checkbox"/>	0	0	0		
Vinyl chloride*	<input type="checkbox"/>	0	0	0		
Xylene*	<input type="checkbox"/>	0	0	0		
1,2,4-Trichlorobenzene*	<input type="checkbox"/>	0	0	0		
1,4-Dichlorobenzene*	<input type="checkbox"/>	0	0	0		
1,4-Phenylenediamine*	<input type="checkbox"/>	0	0	0		
2,4,5-Trichlorophenol*	<input type="checkbox"/>	0	0	0		
2,4,6,-Trichlorophenol*	<input type="checkbox"/>	0	0	0		
2,4-Dinitrophenol*	<input type="checkbox"/>	0	0	0		
2,4-Dinitrotoluene*	<input type="checkbox"/>	0	0	0		
3,3'-Dichlorobenzidine*	<input type="checkbox"/>	0	0	0		
4,4'-Methylenedianiline*	<input type="checkbox"/>	0	0	0		
4-Aminobiphenyl*	<input type="checkbox"/>	0	0	0		
4-Nitrobiphenyl*	<input type="checkbox"/>	0	0	0		
4-Nitrophenol*	<input type="checkbox"/>	0	0	0		
Aniline*	<input type="checkbox"/>	0	0	0		
Benzidine*	<input type="checkbox"/>	0	0	0		
bis(2-Chloroethyl) ether*	<input type="checkbox"/>	0	0	0		
bis(2-Ethylhexyl) phthalate*	<input type="checkbox"/>	0	0	0		
Dimethyl phthalate*	<input type="checkbox"/>	0	0	0		
Hexachlorobenzene*	<input type="checkbox"/>	0	0	0		
Hexachlorobutadiene*	<input type="checkbox"/>	0	0	0		
Hexachlorocyclopentadiene*	<input type="checkbox"/>	0	0	0		
Hexachloroethane*	<input type="checkbox"/>	0	0	0		
Hydroquinone*	<input type="checkbox"/>	0	0	0		
Isophorone*	<input type="checkbox"/>	0	0	0		
Napthalene*	<input type="checkbox"/>	0	0	0		
Nitrobenzene*	<input type="checkbox"/>	0	0	0		
o-Anisidine*	<input type="checkbox"/>	0	0	0		
o-Toluidine*	<input type="checkbox"/>	0	0	0		
Pentachloronitrobenzene*	<input type="checkbox"/>	0	0	0		
Pentachlorophenol*	<input type="checkbox"/>	0	0	0		
Phenol*	<input type="checkbox"/>	0	0	0		
-----	<input type="checkbox"/>	0	0	0		
Dioxin/Furan*	<input type="checkbox"/>	1.30E-06	1.30E-06	0		
-----	<input type="checkbox"/>	0	0	0		
(The following emissions are bubbled together)	<input type="checkbox"/>	0	0	0		
HCl	<input checked="" type="checkbox"/>	416.76	416.76	0	0	416.76
Chlorine	<input type="checkbox"/>	0	0	0		
-----	<input type="checkbox"/>	0	0	0		
Arsenic*	<input type="checkbox"/>	0.18	0.18	0		
Beryllium*	<input type="checkbox"/>	0.18	0.18	0		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Cadmium*	<input type="checkbox"/>	0.58	0.58	0		
Chromium*	<input type="checkbox"/>	0.18	0.18	0		
Lead*	<input type="checkbox"/>	0.58	0.58	0		
Mercury*	<input type="checkbox"/>	0.39	0.39	0		
-----	<input type="checkbox"/>	0	0	0		
(The following emissions are bubbled together)	<input type="checkbox"/>	0	0	0		
Antimony*	<input type="checkbox"/>	119.3	119.3	0		
Cobalt*	<input type="checkbox"/>	0	0	0		
Manganese*	<input type="checkbox"/>	0	0	0		
Nickel*	<input type="checkbox"/>	0	0	0		
Selenium*	<input type="checkbox"/>	0	0	0		
-----	<input type="checkbox"/>	0	0	0		
Single HAP	<input type="checkbox"/>	0	0	0		
Total Other HAP	<input type="checkbox"/>	0.14	0.14	0		
-----	<input type="checkbox"/>	0	0	0		
NOx + VOC adjustment	<input checked="" type="checkbox"/>	-5.4	-5.4	0	0	-5.4