

STATEMENT OF BASIS

For the issuance of Air Permit # 0075-AOP-R20 AFIN: 41-00001

1. PERMITTING AUTHORITY:

Arkansas Department 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:

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
9/29/2017	Renewal	Added SN-326.CH22, Added condensable PM ₁₀ for SN-443.SK10
3/12/2018	Minor Mod	Installed wider conveyor belt in the clinker dome tunnel.

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. With this permitting action, Ash Grove is:

1. Renewing the Title V permit for the facility.
2. Adding SN-326.CH22 Raw Meal.

3. Removed the following sources – SN-326.BF20, SN-213.P1, SN-41F.BF10, SN-403.T1, SN-449.T1, SN-HR09, 41F.TK10.
4. Revising the specific condition numbering system to a chapter numbering system.
5. Revising applicable subpart sections and eliminate paraphrasing of the Federal regulations.
6. Updating the permit shield.
7. Revising source descriptions and process descriptions.
8. Correcting several emission limits due to updated calculations and rounding.
9. Source SN-RCC was renamed to SN-BCC. Source SN-M9 was renamed to SN-311-CHA.
10. Updating the insignificant activity list.
11. Adding condensable PM₁₀ to the PM₁₀ total for SN-443.SK10.
12. Removing the negotiated conditions (Specific Conditions 288 - 291 of Permit 0075-AOP-R19) of the Permit Appeal Resolution (PAR) regarding road emissions. Silt testing was completed in 2014 and was below permit limits.
13. Installing a wider conveyor belt in the clinker dome tunnel – Minor Mod
14. Incorporating the conditions of the Consent Decree and removing Appendix Q - Ash Grove Cement EPA Consent Decree.

The permitted emission increases include 400.8 tpy of PM₁₀, 0.2 tpy of SO₂, 1.1 tpy of VOC, 0.3 tpy of CO, and 0.16 tpy of HCL/Chlorine. The permitted emission decreases include 0.2 tpy of PM, 0.3 tpy NO_x, and 0.8 tpy HAPs.

The facility did not undergo a PSD review for PM₁₀ since there was no physical change to SN-443.SK10. This source was not required to be evaluated for condensable PM₁₀ during the previous PSD evaluation and was therefore grandfathered. The PSD permit was issued in 2007 which pre-dates condensable PM₁₀ as a regulated NSR pollutant.

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 December 7-8, 2015. The following items were noted on the inspection report:

The permittee did provide all of the daily records as required by Specific Conditions 216, 220, 221, 224, 225, 235, 238, 244, and 247. The records were available on site for review; however, these records were not submitted in accordance with General Provision 7. Mr. Byerly will be submitting a revised copy with all of the required documentation by January 1, 2016.

The report submitted on November 24, 2015 did not contain all of the data required for the reporting period. The report lacked all of the required documentation that is to be submitted to demonstrate compliance with Specific Condition 264. The documentation was being recorded and was viewed on site. The documentation was simply not submitted with semiannual report. Mr. Byerly will be submitting a revised copy with all of the required documentation by January 1, 2016.

Per Zylab, the revised SAM reports were received 12/30/15 and 1/4/16. Informal Enforcement was recommended. No formal enforcement action is pending against this facility.

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, explain why this permit modification is not PSD.

There were no increases in emissions above the significance threshold for VOC.

The facility did not undergo a PSD review for PM₁₀ since there was no physical change to SN-443.SK10. This source was not required to be evaluated for condensable PM₁₀ during the previous PSD evaluation and was therefore grandfathered.

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

Source	Pollutant	Regulation (NSPS, NESHAP or PSD)
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, 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	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	Benzene Waste Operations	40 CFR Part 61, Subpart FF
41F.FT10, 40F.FT3, 40F.FT4, 40F.FT5, 40F.FT6, 40F.FT7, 40F.FT8, 40F.FT9, 40F.FTA, 40F.TX1, 45F.TX10, RCC	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. PERMIT SHIELD – TITLE V PERMITS ONLY:

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

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

If yes, are applicable requirements included and specifically identified in the permit? **Y**
If not, explain why.

11. EMISSION CHANGES AND FEE CALCULATION:

See emission change and fee calculation spreadsheet in Appendix A.

12. 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 ADEQ 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.

13. 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%	

14. 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			

15. 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

16. 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
41A.P6	Pile area	0.52 acres	Annually	Y
221.RMB1	Pile area	4.93 acres	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

17. 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

18. DELETED CONDITIONS:

19. 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							
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							
1,000 gal used oil UST	A-3							

Source Name	Group A Category	Emissions (tpy)						
		PM/PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs	
							Single	Total
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			4.396			0.44	0.88
Cadence Lab Vents	A-5			0.007			0.007	0.007
Piles associated with clean-up	A-13	See A-13 total.						
10,000 gallon oil tank	A-13							
12,000 gallon oil 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			0.44	0.44

20. VOIDED, SUPERSEDED, OR SUBSUMED PERMITS:

List all active permits voided/superseded/subsumed by the issuance of this permit.

Permit #
0075-AOP-R19

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-R20
AFIN: 41-00001

\$/ton factor	23.93	Annual Chargeable Emissions (tpy)	6970.16
Permit Type	Modification	Permit Fee \$	8006.0208

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)	334.56
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 condensible 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		324.4	324.2	-0.2		
PM ₁₀		257	657.8	400.8	333.4	657.8
PM _{2.5}		0	0	0		
SO ₂		2701.4	2701.6	0.2	0.2	2701.6
VOC		219.7	220.8	1.1	1.1	220.8
CO		1722.9	1723.2	0.3		
NO _x		2978.9	2978.6	-0.3	-0.3	2978.6
1. (The following HAPs are bubbled together)	<input type="checkbox"/>	0	0	0		
1,1,1-Trichloroethane*	<input type="checkbox"/>	195.96	195.94	-0.02		
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"/>	416.6	416.76	0.16	0.16	416.76
Chlorine	<input type="checkbox"/>	0	0	0		
-----	<input type="checkbox"/>	0	0	0		
Arsenic*	<input type="checkbox"/>	0.2	0.18	-0.02		

Pollutant (tpy)	Check if Chargeable Emission	Old Permit	New Permit	Change in Emissions	Permit Fee Chargeable Emissions	Annual Chargeable Emissions
Beryllium*	<input type="checkbox"/>	0.2	0.18	-0.02		
Cadmium*	<input type="checkbox"/>	0.7	0.58	-0.12		
Chromium*	<input type="checkbox"/>	0.2	0.18	-0.02		
Lead*	<input type="checkbox"/>	0.7	0.58	-0.12		
Mercury*	<input type="checkbox"/>	0.4	0.39	-0.01		
-----	<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"/>	0.61	0.14	-0.47		
-----	<input type="checkbox"/>	0	0	0		
NOx + VOC adjustment	<input checked="" type="checkbox"/>	-5.4	-5.4	0	0	-5.4