

**Shasta County Department of Resource Management
Air Quality Management District**

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Redding, CA 96001

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Evaluation Report

**Regarding Proposed Issuance of a
Title V Operating Permit to**

Lehigh Cement Company

For Equipment Located at:

**15390 Wonderland Blvd.,
Redding, CA 96003**

July 30, 2019

**Evaluation Report
Regarding Proposed Renewal of a
Title V Operating Permit
Lehigh Cement Company**

Introduction

The District proposes to renew Title V Operating Permit #02-VP-07 to Lehigh Cement Company (Lehigh). This evaluation, with the draft renewal Title V operating permit, sets forth the legal and factual basis for the conditions contained in the proposed permit. This permit renewal is based on a renewal application received by the District from Lehigh on October 30, 2017 and on the Title V Minor Permit Modification Application Received on May 28, 2019. The National Emissions Standards for Hazardous Air Pollutants (NESHAP) were incorporated into the existing permit as they existed on April 22, 2015. Since that time, the United States Environmental Protection Agency (EPA) has corrected and amended the NESHAP for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants seven times including the following:

1. NESHAP for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants; Correction. Federal Register Vol. 80, No.176, September 11, 2015.
2. NESHAP for the Portland Cement Manufacturing Industry; Proposed rule amendment. Federal Register Vol. 80, No. 142, July 25, 2016.
3. NESHAP for the Portland Cement Manufacturing Industry: Direct Final Rule amendment, Federal Register Vol81, No. 142, July 25, 2016.
4. NESHAP for the Portland Cement Manufacturing Industry: Alternative Monitoring Method, Federal Register Vol. 82, No. 120, June 23, 2017.
5. NESHAP for the Portland Cement Manufacturing Industry: Alternative Monitoring Method, Federal Register Vol. 82, No. 161, August 22, 2017.
6. NESHAP for the Portland Cement Manufacturing Industry Residual Risk and Technology Review; Federal Register Vol. 82, No. 182, September 21, 2017.
7. NESHAP for the Portland Cement Manufacturing Industry Residual Risk and Technology Review; Federal Register Vol. 83, No. 143, July 25, 2018.

These amendments to the rules will be incorporated into the revised Title V permit.

Facility Description

Lehigh Southwest Cement Company operates a Portland Cement plant in Redding, California. The plant was originally constructed in 1961 and modernized in 1981. The plant is considered a Federal Major Source and subject to the Title V permitting program due to the facility's potential to emit emissions of oxides of nitrogen (NO_x), carbon monoxide (CO), particulate matter (PM₁₀), oxides of sulfur (SO_x) and hydrogen chloride.

Since the initial evaluation for the issuance of the Title V permit in 2002, the following Authorities to Construct have been granted by the District:

Additional Packhouse Dust Collector, J-387, April 30, 2003
Automated Tire Handling System, March 3, 2004
Portable Silo, PRM-1, August 5, 2004
Quarry Drill, R-116, August 5, 2004
Secondary Fuel System, May 16, 2006
Diesel Particulate Filters, April 7, 2008.
Add a 67 horsepower diesel welder, March 3, 2011
Add a portable silo with baghouse, March 1, 2012
Add a kiln dust shuttling system, August 12, 2014.

Since the current Title V permit was issued, the following Authorities to Construct have been issued to Lehigh by the District:

Dust Collector on Synthetic Gypsum Silo, January 22, 2015
Hydrated Lime Injection System, March 6, 2015
Activated Carbon Injection System, September 15, 2015
Limestone Crushing Plant Powerscreen Model 1180, May 13, 2016
Limestone Crushing Plant Lokotrack LT 106, July 26, 2016
Limestone Crushing Plant MetsoMinerals Model LT120, December 31, 2018
Temporary Grizzly and Screen, March 14, 2019
Finish Grinding Department High Efficiency Baghouses, March 27, 2019.

The facility is considered a major source of hazardous air pollutants since it emits approximately 16 tons per year of hydrogen chloride. The facility is subject to the following National Emission Standards for Hazardous Air Pollutants: 40 CFR Part 63, subpart A (General Provisions), Subpart LLL (Portland Cement Manufacturing) and ZZZZ (Stationary Reciprocating Internal Combustion Engines).

Equipment Description

The major equipment located at the Lehigh Southwest Cement Company, facility includes:

QUARRIES AND CRUSHING DEPARTMENT

Limestone Crusher (Allis Chalmers)
Shale Crusher
Raise Shaft Sly Dust Collector (B-13)
Limestone Belt Transfer Sly Dust Collector (B-25)
Shale Crusher Sly Dust Collector (C-36)
Secondary Crusher BHA Model 505-4220 Dust Collector (C-34)
Transfer Building Sly Dust Collector (C-38)
Preblending Dome Building
Shale 30" X 42" Jaw Crusher (C168)
Portable Limestone Crusher

RAW MILLING AND KILN DEPARTMENT

Cement In-Line Kiln/Raw Mill With Baghouse Dust Collector (S260)
Shredded Tire and Whole Tire Fuel Feed Systems, Automated
Raw Mix Tanks Dust Collector (C172)
Clinker Handling Dust Collector (G418-1)
Blending Silos Dust Collector (F173)
Raw Storage Silo Dust Collector (F184)
Pre-Heater Kiln Feed Bin Dust Collector (F350)
R-1 Silo Dust Collectors (G231 & G244)
Deep Bucket Conveyor Dust Collector (G425)
Roller Mill Rock Feeders Dust Collector (S210)
Bucket (meal) Elevator Dust Collector (S253)
Coal Unloading Facility
Coal Silo Dust Collector (G206)
Indirect Coal Firing System Dust Collector (G465)
Clinker Cooler (Closed System)
Secondary Fuel System (G228-F, G228-G)
One Hobart Mega-Arc Portable Welder
One Portable Silo with 330 PulseJet Baghouse
One Kiln Dust Shuttling System
One Hydrated Lime Injection System
One Activated Carbon Injection System

FINISH GRINDING DEPARTMENT

Finish Mills with Six (6) Dust Collectors:
EA87, EA92/93, EB147/148, EB142, E35/34, E30
C Mill Feed Elevator (E8) Dust Collector (E12)
C Mill Gypsum Weigh Feeder Dust Collector (E230)
C Mill Clinker Weigh Feeder Dust Collector (E231)
Gypsum Elevator Dust Collector (D34)
Synthetic Gypsum Loading System Dust Collectors (D122, D123)

STORAGE AND SHIPPING DEPARTMENT

Dust Collectors: J159, J162, J165, J168, J174, J321, J345, J350, J387, J390

INTERNAL COMBUSTION ENGINES

(1) Detroit Model V-71 489 BHP Diesel Engine (ID. #R100A)
(5) Caterpillar Model ZW3516-CAT, 2132 BHP Diesel Engines (ID. #'s M151, M152, M153, M154, and M155) with Miratech Combikat Diesel Particulate Filters.

The following emission devices are determined to be insignificant sources per District Rule 5

Attachment 1.

Quarries and Crushing Department

R115 Dust Collectors
C164 Belt Dust Collector (C160)
Bypass Dust Collector (C162)
Motor Oil Storage Tanks
Hydraulic Oil Storage Tanks
Diesel Storage Tanks
Quarries and Crushing Department Mobile Equipment
Outdoor Storage Piles
Quarry Drills (except R-116)

Raw Milling and Kiln Department

Coal/Coke Offloading System
Whole Tire Feed System
Agricultural Fuels Offloading System
Clinker Emergency Discharge System
Clinker Handling Dust Collectors (D87, D88, D89)
Dust Collector J294 (G228-NA)
Laboratory Equipment

Finish Grinding Department

E46 FK Pump Feed Hopper Bin Vent (E48)
B Mill to C Mill Separator Airslide/Blower System
Ball Sorter
Gypsum Rail Car Unloading System
Air Entraining Reagent Storage Tank
Grinding Aid Storage Tanks
Mill Building Ventilating Fans

Storage and Shipping Department

Spring Conveyors for Sacked Cement (J130, J131)
Building Ventilating Fans

Facility Wide Operations

Maintenance/Garage Building Ventilating Fan (K4)

Welding Ventilating Fan (K7)
Oil House Ventilating Fan (K9)
Solvent Degreasing Tanks
Painting Operations
Maintenance Welding Operations
Air Conditioners
Gasoline Storage Tank, 1000 gal (K42)
Gasoline Storage Tank, 500 gal (K44)
Gasoline Storage Tank, 350 gal (B52)
R279 Gasoline Storage Tank, 225 gal
Vacuum Truck (R52)
Internal Combustion Engines \leq 50 brake horsepower

APPLICABLE FEDERAL REQUIREMENTS:

Based upon information submitted in the application and the district's review, the following applicable federal requirements apply to this facility:

SIP Requirements:

Rule 1:2 Definitions

This rule lists the definitions used throughout the District rule book. This rule is an administrative rule, and Lehigh Southwest Cement Company, certified compliance in the application. However, the District believes that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2.1A Permits Required

These are the District's requirements for preconstruction permits and Permits to Operate. This rule is an administrative rule, and Lehigh Southwest Cement Company, certified compliance in the application. However, the District believes that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2:5 Exemptions

This rule lists the types of devices or operations that the Air Pollution Control Officer (APCO) may exempt. This rule is addressed in Rule V, Attachment 1 (insignificant activities); therefore, the District believes that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2:6 Open Burning (2:6.a.4.c & 2:6.b)

This rule lists the regulations required to conduct open burning operations. Lehigh Southwest Cement Company may conduct open burning operations at this facility and the requirements of this rule are included in the Title V permit at Condition F17.

Rule 2:7 Conditions for Open Burning

This rule lists the regulations required to conduct open burning operations. Lehigh Southwest Cement Company may conduct open burning operations at this facility and the requirements of this rule are included in the Title V permit at Condition F17.

Rule 2:10 Action on Applications

This rule requires that an application for an Authority to Construct be filed in a manner and on the form prescribed by the APCO. This rule is an administrative rule and the District believes that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2:12 Expiration of Applications

This rule requires that an Authority to Construct application will expire after the Permit to Operate has been issued or 18 months after the Authority to Construct was issued unless construction has commenced on the site. It also states that a Permit to Operate application will expire two years from the date of filing the application. This rule is an administrative rule and the District believes that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2:14 Testing Facilities

This rule requires the operator to provide and maintain testing and sampling facilities as specified in the Authority to Construct or Permit to Operate. This requirement is included in the proposed Title V permit at condition F12.

Rule 2:21 Defacing Permit (formerly Rule 2:24)

This rule requires that a permit not be defaced. This requirement is included in the proposed Title V permit at condition G21.

Rule 2:23 Posting of Permit

This rule requires that the permit be posted. This requirement is included in the proposed Title V permit at condition G22.

Rule 2:25 Public Records

This rule lists the requirements for what may or may not be public records and includes labeling requirements. This requirement is included in the proposed Title V permit at conditions G24, G25, G26, and G27.

Rule 3:1 Applicability of State Laws

This rule adopts by reference all state and federal rules for air contaminants. This requirement is included in the proposed Title V permit at condition G29.

Rule 3:2 Specific Air Contaminants

This rule specifies limits for emissions of:

- 1) Combustion particulate matter in gr/dscf;
- 2) Particulate matter less than or equal to 10 microns in gr/dscf;
- 3) All other particulate matter in gr/dscf
- 4) Particulate matter process weight: maximum hourly emissions as a function of process weight in tons per hour;
- 5) Oxides of Sulfur (as SO₂) in ppm;
- 6) Oxides of Nitrogen (as NO₂) in ppm; and
- 7) Opacity.

The requirements of this rule are included in the proposed Title V permit at conditions F1 and F3. Other permit conditions found in this Title V permit limiting emissions from various emission sources within the cement plant are either more specific or more stringent than the emission limitations of this rule and, therefore, subsume the requirements of this rule for particular emission units. (See section below titled “New Source Performance Standards”)

Rule 3:4 Industrial Use of Organic Solvents

This rule requires that a control device achieving 85 percent control be utilized unless listed lb/day emission limits of solvents into the atmosphere are met. This requirement is included in the proposed Title V permit at condition F2.

Rule 3:6 Circumvention

This rule requires that emissions cannot be concealed by circumvention. This requirement is included in the proposed Title V permit at condition G5.

Rule 3:9 Recommendations of Control Officer

This rule states that no recommendation of the APCO is a guarantee that the recommended device or process will result in compliance. This rule is an administrative rule, and the District believes that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 3:10 Excess Emissions

This rule requires certain reporting and corrective action in the case of emissions that exceed permit requirements. These requirements are included in the proposed Title V permit at condition F5.

Rule 3:11 Local Rules

This rule states that any city or public agency, having authority to do so, may enact by ordinance more restrictive rules than contained in the District's rule book. Because this permit is a federal permit and does not concern local rules, the District believes that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 3:17 Organic Solvent Degreasing Operations

This rule required degreasing operations to meet design and operating practice specifications. This rule was repealed by the District when the District adopted a revised organic solvent operations rule.

The new Rule 3:17 has not been submitted for inclusion into the SIP and, therefore, the District believes that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 5 Additional procedures for issuing permits to operate for sources subject to Title V of the Federal Clean Air Act Amendments of 1990

This rule lists the requirements of the Title V program. All specific applicable requirements imposed by this rule are included in the proposed Title V permit.

40 CFR 82.161

This regulation requires that equipment utilizing ozone depleting substances be maintained by certified technicians. These requirements are included in the proposed Title V permit.

New Source Performance Standards (NSPS)

This facility is subject to 40 CFR Part 60 - Standards of Performance for New Stationary Sources, Subparts A, F, Y and OOO. These standards for Subpart F were updated on July 27, 2015, after the last Title V permit was issued to Lehigh. These updates were designed to better align the New Source Performance Standards with the National Emission Standards for Hazardous Air Pollutants and will create some modifications to the existing permit language.

All federal NSPS and NESHAPS requirements are listed as permit conditions. State opacity requirements remain on the mainstack for a detached plume and are subsumed to 10% to 20% opacity limits on other sources.

Subpart A General Provisions – Standards of Performance for New Stationary Sources

Section 60.1 Applicability a) Except as provided in subparts B and C, the provisions of this part apply to the owner or operator of any stationary source which contains an affected facility, the construction or modification of which is commenced after the date of publication in this part of any standard (or, if earlier, the date of publication of any proposed standard) applicable to that facility.

The Quarries and Crushing Department dates back to the when the facility was originally constructed in approximately 1961. Most of the facilities in the quarry and crushing department predate the New Source Performance Standards for Nonmetallic Mineral Processing Plants which were promulgated in 1975. The only equipment in the Quarries and Crushing Department that is not exempt from the New Source Performance Standard for Nonmetallic Mineral Processing Plants is the Shale Jaw Crusher (C168) and any portable primary limestone crushers that have been recently authorized. The shale crusher and any portable limestone crusher will be subject to Title V permit conditions requiring compliance with opacity limits and other applicable provisions set

forth in Subpart OOO. The Quarries and Crushing Department was not included in the Cement manufacturing facility modification of the 1980's.

Subpart F Standards of Performance for Portland Cement Plants

Section 60.62(a)(1) - The Standards of Performance revised by EPA and dated February 12, 2013, set the new particulate matter limit at 0.07 pounds per ton of clinker effective on September 9, 2015, for any kiln that has undergone a modification. The Lehigh Southwest Cement kiln was modified in 1984. The limit subsumes the District imposed conditions for particulate matter at 0.30lb/ton dry feed material, 17.9 pounds per hour (maximum two-hour average) during roller mill bypass and 17.2 pounds per hour (maximum two-hour average) during roller mill operation. The coal mill is not considered an in-line coal mill since the coal mill uses exhaust gas near the kiln heat source but upstream from any kiln exhaust gases.

Section 60.62(b)(2) – *If the kiln and clinker cooler exhaust are combined for energy efficiency purposes and sent to a single control device, the appropriate kiln PM limit may be adjusted using the procedures in Section 63.1343(b) of the NESHAP rule.*

Lehigh requests that the particulate matter limit in Section 60.62(a)(1) be used for their stack (S260). The alternative limit as calculated below will not be used and conditions B.2 and B.6 will contain the 0.07 pounds per ton of clinker (dry basis) particulate matter emission limit.

The kiln's clinker cooler exhaust is combined into the kiln at the burner. In order to accommodate the additional particulate resulting from the use of clinker cooler exhaust gases in the kiln and to control particulate emissions from the clinker cooler gases, the EPA allows an Alternative PM Emissions limit. This limit is calculated using equation 1 of the MACT Standard at 40 CFR Part 63.1343:

$$PM_{alt} = (0.0060 \times 1.65) (Q_k + Q_c + Q_{ab} + Q_{cm}) / (7000) \quad (\text{Eq. 1})$$

Where:

PM_{alt} = Alternative PM emission limit for commingled sources.

0.006 = The PM exhaust concentration (gr/dscf) equivalent to 0.070 lb per ton clinker where clinker cooler and kiln exhaust gas are not combined.

1.65 = The conversion factor of ton feed per ton clinker.

Q_k = The exhaust flow of the kiln (dscf/ton feed).

Q_c = The exhaust flow of the clinker cooler (dscf/ton feed).

Q_{ab} = The exhaust flow of the alkali bypass (dscf/ton feed).

Q_{cm} = The exhaust flow of the coal mill (dscf/ton feed).

7000 = The conversion factor for grains (gr) per lb.

The comingled exhaust flow volume totals 116,000 dscfm. The typical kiln feed rate is 99 ton/hr.

Therefore:

$PM_{alt} = (0.0060 \times 1.65) (\{116,000 \text{scfm} \times 60 \text{min/hr}\} / 99 \text{ton/hour feed}) / 7000 = 0.10 \text{ lb/ton clinker.}$

This PM alt limit will not be used in the Title V permit.

Section 60.62(a)(2) – This section sets a 20% opacity limit on the kiln stack. This section does not apply to the Lehigh kiln stack since it uses a PM continuous parametric monitoring system (CPMS).

Section 60.62(a)(3) - Standard for nitrogen oxide (NO_x) for Portland cement kilns that have commenced construction, reconstruction, or modification after June 16, 2008. This cement kiln has not been constructed, reconstructed or modified after June 16, 2008. The existing district NO_x limit of 5,940 pounds per day and 954 tons per year at condition B5 remains in the permit.

Section 60.62(a)(4) – Standard for SO₂ for Portland Cement kilns that have commenced construction, reconstruction, or modification after June 16, 2008. This cement kiln has not been constructed, reconstructed or modified after June 16, 2008. The District SO₂ limit contained at Condition B4 remains in the permit. This limit is 200 lbs/hr in any block three hour average, 2160 lbs/day in any calendar day, 553 lbs/day average in a calendar quarter, and 100.9 tons/year rolling 12 month average.

Section 60.62(b) – (1) Standard for PM emissions for a clinker cooler if construction or reconstruction of the clinker cooler commenced after June 16, 2008, or if the clinker cooler has undergone a modification is 0.02 for construction/reconstruction and 0.07 pound/ton clinker for modification. Neither construction/reconstruction after June 16, 2008, nor a modification has occurred to the clinker cooler. The clinker cooler gases are subject to a PM limit of 0.07 pounds per ton of clinker via Section 63.1343 of the NESHAPs. Clinker cooler gases exit with the main kiln exhaust through the same baghouse (S-260).

(2) If the kiln and clinker cooler exhaust are combined for energy efficiency purposes and sent to a single control device, the appropriate kiln PM limit may be adjusted using the procedures in Part 63.1343(b). The exhaust from the kiln and clinker cooler are combined and sent to a single control device and the combined exhaust limit can be calculated as shown in this evaluation for section 60.62(a)(1). The combined exhaust limit is not used in this permit and the lower kiln stack limit of 0.07 pounds per ton clinker is used.

Section 60.62(c) – Existing permit Conditions B1 and B2 limit the in-line kiln/raw mill stack emissions to 20% opacity. This citation limits any other discharge of gases from the facility to 10% opacity. The 10% opacity limit is contained in the existing Title V permit at Conditions #B2, B3, C2, C5, D2, and D7.

Section 60.62(d) - If you have an affected source subject to this subpart with a different emissions limit or requirement for the same pollutant under another regulation in title 40 of this chapter, you must comply with the most stringent emissions limit or requirement and are not subject to the less stringent requirement.

The requirements for a continuous opacity monitor on the in-line kiln/raw mill stack (S260) originate from the conditions within the 1978 NSR/PSD permit (NSR 4-4-4, SAC78-01) authority to construct issued by the U.S. EPA Region IX. The permit was issued in accordance with federal regulations governing Review of New or Modified Stationary Sources (40 CFR 52.233 (g)) and the Prevention of Significant Deterioration (40 CFR 52.21). Other applicable provisions cited in the permit are specifically listed as provisions of 40 CFR Parts 52, 60 and 61 and all other applicable Federal, State or local regulations.

The requirement for a continuous opacity monitor system (COMS) exists today in the district issued Permit to Operate # 85-PO-14. Shasta County AQMD rules do not contain any provisions requiring an opacity monitor.

Since the requirements for an opacity limit is exempted by Section 60.62(a)(2) and requirement for COMS on the kiln stack originated from only Title 40 of the CFR, the requirement for a COMS is exempted per this section, 60.62(d).

Section 60.63(b) - Requires the owner or operator of any Portland cement plant to record the daily production rates and kiln feed rates. Condition B23h requires this information to be recorded. Per section 60.63(1)(ii) Lehigh Southwest Cement measures kiln feed with a permanent weigh scale system which determines the amount of kiln feed in tons of mass per hour. Condition B23h requires monthly reconciliation of the calculated feed-to-clinker ratio based on clinker production rates determined for accounting purposes and recorded feed rates.

Section 60.63(b)(2) – This section requires that during each quarter of operation, Lehigh Southwest Cement must determine, record and maintain a record of the ongoing accuracy of the system of measuring hourly clinker production rate or feed rates. Quarterly feed rate accuracy must be maintained within +/-5%, calculated hourly, feed to production rate must be updated monthly with the new ratio used going forward. This requirement is incorporated into the renewal permit at Condition B49.

Section 60.63(c)(1) - Requires that an initial performance test is required by September 9, 2015, to demonstrate compliance with the PM emissions limit contained in section 60.62. Condition B25 will be modified in the revised permit to include this requirement and since the initial requirement date is past, this will be removed from the permit.

Section 60.63(c)(2) – A continuous parametric monitoring system (CPMS) for particulate matter must be used to demonstrate continuous compliance with the PM emissions limit. Lehigh

Southwest Cement must establish a site-specific operating limit for the particulate matter (PM) CPMS. The PM CPMS is a separate measuring unit that provides a linear current output based on stack particulate level. A site specific limit for the PM CPMS must be calculated and reported during annual source testing as outlined in Section 60.63(c) (2) through (8). Conditions B22 and B25 will be updated to reflect the requirements of this section.

Section 60.63(d,e&f) - These sections deal with requirements for monitoring on NOx and SO2 which do not apply to the Lehigh Southwest Cement kiln.

Section 60.63(g) - The PM CPMS must operate and collect data at all required intervals at all times the affected source is operating, except for periods of monitoring system malfunctions, repairs, and required monitoring system quality assurance or quality control activities. Data recorded during the monitoring system malfunctions, repairs or required monitoring system quality assurance or control activities may not be used in reporting emissions or operating levels. Condition B32 of the permit to requires compliance with these PM CPMS operating and reporting requirements of Section 60.63(g).

Section 60.63(h) – This section specifies the requirements for the installation, operation, calibration, and maintenance for the instruments used to continuously measure and record the stack gas flow rate to allow determination of the PM mass emissions rate. Condition B22 includes this requirement.

Section 60.63(i) – This section allows for the operator to petition the EPA Administrator to use a site-specific monitoring plan to demonstrate compliance with applicable emissions limits. The applicant has not requested this.

Section 60.64(a&b) - Outlines test methods and procedures for determining particulate matter emissions from the kiln and clinker cooler. Condition B6 satisfies this requirement by requiring EPA Method 5 testing. Any affected sources subject to the 10% limit in section 60.62(c) must determine opacity levels using Method 9. Sources must be observed, recorded and reported using EPA Method #22 on a schedule as outlined in Conditions B27, C2, C5, D2 and D7.

Section 60.64(c) – This section pertains to NOx and SO2 which do not apply to the Lehigh Southwest Cement kiln.

Section 60.64(d) - (1) Within 60 days after the date of completing each performance test (see §60.8) as required by this subpart you must submit the results of the performance tests conducted to demonstrate compliance under this subpart to the EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through the EPA's Central Data Exchange (CDX) (<http://www.epa.gov/cdx>). Performance test data must be submitted in the file format generated through use of the EPA's Electronic Reporting Tool (ERT) (see <http://www.epa.gov/ttn/chief/ert/index.html>). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE.

Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk, flash drive or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to the EPA via CDX as described earlier in this paragraph. At the discretion of the delegated authority, you must also submit these reports, including the CBI, to the delegated authority in the format specified by the delegated authority. For any performance test conducted using test methods that are not listed on the ERT Web site, you must submit the results of the performance test to the Administrator at the appropriate address listed in §63.13. This is included in Condition B50.

(2) Within 60 days after the date of completing each CEMS performance evaluation test as defined in §63.2, you must submit relative accuracy test audit (RATA) data to the EPA's CDX by using CEDRI in accordance with paragraph (d)(1) of this section. Only RATA pollutants that can be documented with the ERT (as listed on the ERT Web site) are subject to this requirement. For any performance evaluations with no corresponding RATA pollutants listed on the ERT Web site, you must submit the results of the performance evaluation to the Administrator at the appropriate address listed in §63.13. This is included in Condition B51.

(3) For PM performance test reports used to set a PM CPMS operating limit, the electronic submission of the test report must also include the make and model of the PM CPMS instrument, serial number of the instrument, analytical principle of the instrument (e.g. beta attenuation), span of the instruments primary analytical range, milliamp value equivalent to the instrument zero output, technique by which this zero value was determined, and the average milliamp signals corresponding to each PM compliance test run. This is included in Condition B52.

(4) All reports required by this subpart not subject to the requirements in paragraphs (d)(1) and (2) of this section must be sent to the Administrator at the appropriate address listed in §63.13. The Administrator or the delegated authority may request a report in any form suitable for the specific case (e.g., by commonly used electronic media such as Excel spreadsheet, on CD or hard copy). The Administrator retains the right to require submittal of reports subject to paragraph (d)(1) and (2) of this section in paper format. This is included in Condition B53.

Section 60.65(a),(b), and (c) - Outlines the recordkeeping and reporting requirements in reference to excess emissions, monitoring of visible emissions, malfunction information, or incidents requiring de-energizing control equipment. Reporting requirements specified in Condition B23 satisfies and in some cases exceed the requirements of this section by requiring monthly reports for the specified information as opposed to semiannual reports required by this section. Condition B45 contains the required 6-month excess emission reporting per 40 CFR 60.7(c).

Subpart Y - Standards of Performance for Coal Preparation and Processing Plants

Section 60.250 Applicability and designation of affected facility. The coal processing facility was constructed/modified in 1985. The Lehigh coal processing facility operates at less than 200 tons per day but is listed in the application from Lehigh at a capacity of the coal unloading facility of 85,250 tons per year (237 tons per day) and therefor is designated as an affected facility.

Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants

Section 60.670 Applicability and designation of affected facility. The Shale Jaw Crusher (C168) and any recent portable limestone crushers are subject to this subpart.

Section 60.671 Definitions. These definitions will apply to the permit terms.

Section 60.672 Standards for particulate matter (PM).

These requirements are contained in Condition A6 of the renewal permit.

Section 60.673 Reconstruction

These quarry and crushing facilities have not undergone reconstruction.

Section 60.674 Monitoring of Operations.

No wet scrubber or bag leak detection system is used on the sources.

Section 60.675 Test methods and procedures.

The required test methods are shown in Condition A6 of the draft renewal permit.

Section 60.676 Reporting and recordkeeping.

This section does not apply to any of the existing equipment.

40 CFR Part 63 Subpart A- National Emission Standards for Hazardous Air Pollutants General Provisions.

Refer to Table 1 at the end of Subpart LLL.

40 CFR Part 63 Subpart LLL- National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry.

This subpart was promulgated by EPA on December 20, 2006. Also on December 20, 2006, EPA published a Notice of Reconsideration for the new source standards for mercury and hydrocarbons contained in that NESHAP subpart. On January 26, 2009, EPA published notice of a proposed settlement to resolve multiple petitions from all sides regarding this regulation. This notice of proposed settlement states that EPA will take final action on the proposed NESHAP rule by March 31, 2010. On February 12, 2013, EPA published the Final Rule action in the Federal Register for the National Emission Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants: Final Rule. Additionally, EPA has issued a corrections and alternatives to monitoring procedures, and issued a Residual Risk and Technology Review for the cement industry NESHAPs.

The Lehigh Southwest Cement Company Title V renewal permit being the subject of this

evaluation will be based on the final NESHAP for Portland Cement Manufacturing as it exists on April, 2019.

63.1340- This section defines the applicability and designation of affected sources. The District has determined that Subpart LLL does apply to Lehigh Southwest Cement Company and has incorporated the applicable sections of this rule in the proposed Title V permit. This facility is considered to be an existing major source cement plant. Effected sources at the Lehigh plant include the cement kiln, clinker cooler, raw mill, finish mills, storage bins, cement and coal mill conveying systems, and bagging and bulk loading systems. No open clinker storage piles, as defined in §63.1341, are permitted at the facility. The Operations and Maintenance Plan Revised on March 2017 with the Open Clinker Storage Piles Supplement dated September 2017, states that any open clinker piles will be covered with tarps.

63.1341- These definitions are incorporated into the draft of this renewal permit.

63.1342- This section states that most of the general provisions of the NESHAP are applicable to this subpart. These provisions apply to Lehigh Southwest Cement Company and have been included in the proposed Title V permit as Conditions F13, F14, and F15.

63.1343 (a) and (b),- This section sets standards for all in-line kiln/raw mills at major sources. These standards apply to Lehigh Southwest Cement Company and have been included in the proposed Title V permit as Conditions B2 and D2. The PM standard is incorporated into the draft permit to not include the alternative PM standard detailed for §60.62(b)(2) for the kiln and clinker cooler. The standards for hazardous air pollutants (Mercury, THC, HCL and work practices) will be included in the draft renewal permit.

Opacity standards will remain unchanged from the existing permit, with the exception of the federally enforceable portion of Condition B1.

63.1343 (c) - Condition B20 requires any outdoor clinker piles or clinker spillage be cleaned up within 3 days.

63.1344 - Affirmative Defense for Violation of Emission Standards During Malfunction.

The section has been removed and condition F18 has been removed from the original permit.

63.1345 – Emission limits for affected sources other than kilns; clinker coolers; new and reconstructed raw material dryers.

This section limits opacity of affected storage bins, conveying systems, bulk systems and raw and finish mills to 10% opacity. These requirements are in the current permit at Conditions # B2, B3, B19, C2, and D2, and will be retained in the revised permit.

63.1346 – Operating Limits for Kilns.

Paragraphs (a through f): This section sets operating parameters to determine continuous

compliance with the dioxin/furan limits in section 63.1343(b). This condition is in the existing permit at Condition B2 and will be retained in the renewal permit draft.

Paragraph (g): This section reads as follows:

g) During periods of startup and shutdown you must meet the requirements listed in (g)(1) through (4) of this section.

(1) During startup you must use any one or combination of the following clean fuels: natural gas, synthetic natural gas, propane, distillate oil, synthesis gas (syngas), or ultra-low sulfur diesel (ULSD) until the kiln reaches a temperature of 1200 degrees Fahrenheit.

(2) Combustion of the primary kiln fuel may commence once the kiln temperature reaches 1200 degrees Fahrenheit.

(3) All air pollution control devices must be turned on and operating prior to combusting any fuel.

(4) You must keep records as specified in §63.1355 during periods of startup and shutdown.

This paragraph is listed as condition B21 in the draft renewal permit.

63.1347 – Operation and Maintenance Plan Requirements.

Lehigh submitted an update to their Operations and Maintenance Plan dated March, 2017 with a supplement for Open Clunker Storage Piles dated September 2017.

The existing Operations and Maintenance Plan remains in effect. The requirement for this section is contained at Condition F15.

63.1348 – Compliance Requirements.

(a) Initial Performance Test Requirements. (Completed)

(1) PM Compliance. EPA Method 5 or 5(I) in appendix A-3 to part 60 of Chapter 40 must be used for initial compliance. This requirement is contained in the existing permit at Condition B25. A PM continuous parametric monitoring system will be used for continuous compliance demonstration and will be calibrated during the performance test and updated annually. This requirement will be updated to Condition B27 of the renewal permit.

(2) Opacity Compliance. Method 9 of appendix A-4 to part 60 of Chapter 40 is used for initial opacity determination. Use the maximum 6-minute average opacity exhibited during the performance test period to determine whether the affected source is in compliance with the standard. The three hour test duration may be reduced to one hour if there are no individual readings greater than 10 percent opacity and there are no more than three readings of 10 percent for the first hour.

(3) D/F Compliance. The performance test must be done using Method 23 of appendix A-7 to 40CFR part 60. This method is specified in Condition B27 of the existing permit.

(4) THC Compliance. The operator must use CEMs in accordance with the requirements in 40CFR63.1350(i) which requires the system operate in accordance with Performance Specification 8 or 8A of 40CFR part 60 appendix B. The span value in the relative accuracy test

must be 50 ppmvd as propane and the reference method for the annual RATA is Method 25A of 40CFR60 appendix A. Condition B36 of the draft renewal permit contains this requirement.

(5) Mercury Compliance. Lehigh must operate mercury CEMs or a sorbent trap monitoring system in accordance with the requirements of 40CFR63.1350(k). The initial compliance test must be based on the first 30 kiln operating days in which the affected sources operates using a mercury CEMs or a sorbent trap. The mercury CEMs or sorbent trap must be operated as specified in 40CFR63.1350(k) including the requirements for the exhaust gas flow rate measuring and recording system in 40CFR63.1350(k)(5). Condition B37 is contained in the renewal permit for this requirement.

(6) HCl Compliance. These tests must be conducted per this paragraph. If a wet scrubber, tray tower or dry scrubber is used to control HCl then a FTIR Spectroscopy method (Method 321) is used for the initial performance testing and establishment of monitoring parameters. If the source is not controlled by a wet scrubber, tray tower, or dry sorbent injection system a CEMs must be operated in accordance with the requirements of §63.1350(l)(1) which specifies operation in accordance with Performance Specification 15 of appendix B part 60. A SO₂ monitor and parametric monitoring may be substituted for CEMs if a wet scrubber, tray tower or dry scrubber is used. Condition B38 is contained in the renewal permit to include this requirement.

(7) Commingled Exhaust Requirements. The coal mill exhaust is not commingled.

(b) Continuous Monitoring Requirements.

Lehigh must demonstrate compliance with the emissions standards and operating limits by using the performance test methods and procedures in §§63.1350 and 63.8 for each affected source.

(1) General Requirements. Lehigh must monitor and collect data according to §63.1350 and the site specific monitoring plan required by §63.1350(p). Except for periods of startup and shutdown, monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, calibration checks and required zero and span adjustments), Lehigh must operate the monitoring system and collect data at all required intervals at all times the affected source is operating. Lehigh may not use data recorded during monitoring system malfunctions, or required monitoring system quality assurance or control activities in calculations used to report emissions or operating levels. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance of careless operation are not malfunctions. Lehigh must use all the data collected during all other periods in assessing the operation of the control device and associated control system. Lehigh must determine hourly clinker production rates according the requirements at § 63.1350(d). Condition B31 will be modified within the permit stating these general requirements.

- (2) PM Compliance. Continuous PM compliance must be demonstrated using the monitoring methods and procedures in §63.1350(b) and (d). See Condition B32.
- (3) Opacity Compliance. Lehigh must use the monitoring methods and procedures in §63.1350(f) based on the maximum 6-minute average opacity exhibited during the performance test period. Corrective actions must be initiated within one hour of detecting visible emissions above the applicable limit. See revised Condition B15.
- (4) Dioxin/Furan Compliance. Lehigh will use the temperature CMS that is operated, installed and maintained to record the temperature of specified gas streams in accordance with the requirements of §63.1350(g). This requirement will be added to the existing permit Conditions B2, B15 and B27.
- (5) Activated Carbon Injection Compliance. Lehigh may be using this control method. See permit condition B15 (e).
- (6) THC Compliance. Lehigh will be demonstrating compliance with the THC limit in §63.1343 which is the 24 ppmvd @7 percent O₂ limit. They will demonstrate compliance using the monitoring methods and procedures in §63.1350(i). THC will be measured upstream of the coal mill. Condition B15 (f) contains this requirement.
- (7) Mercury Compliance. Lehigh will be required to use the monitoring methods and procedures in §63.1350(k) to demonstrate continuous mercury emissions compliance. Mercury will be measured upstream of the coal mill. Condition B15 (f) contains this requirement. Condition B 35 also discusses this requirement.
- (8) HCl Compliance. Lehigh will demonstrate compliance using the performance test methods and procedures in §63.1349(b)(6) and §63.1350(l)(1). HCl will be measured upstream of the coal mill. A condition (B36) will be added to the permit for this requirement. If dry sorbent injection is used to control HCl emissions, Lehigh may use a CMS for sorbent mass flow rate monitoring as specified in §63.1350(m)(9). These requirements are conditioned at B15 and B36.
- (9) Startup and Shutdown Compliance. In order to demonstrate continuous compliance during startup and shutdown the control devices must be operating. The requirement is contained in Condition B15 and B39.

(c) Changes in Operations. Should Lehigh plan to undertake a change in operation that may adversely affect compliance with an applicable standard, a performance test must be conducted as specified in §63.1349(b). Written notice must be provided to the Administrator at least 60 days prior to undertaking an operational change that may adversely affect compliance with an applicable standard. The performance test must be completed within 360 hours after the planned operational change period begins. Condition F9 of the existing permit will be changed to include the requirements of this section.

(d) General Duty to Minimize Emissions. Condition G3 of the existing permit will be expanded to include the language from this section.

63.1349 – Performance Testing Requirements.

(a) Lehigh must document performance test results in complete test reports that contain the information required by paragraphs (a)(1) through (10) of this section, as well as all other relevant information. As described in §63.7(c)(2)(i), Lehigh must make available to the Administrator prior to testing, if requested, the site-specific test plan to be followed during performance testing. For purposes of determining exhaust gas flow rate to the atmosphere from an alkali bypass stack or a coal mill stack, Lehigh must either install, operate, calibrate and maintain an instrument for continuously measuring and recording the exhaust gas flow rate according to the requirements in paragraphs §63.1350(n)(1) through (10) of this subpart or use the maximum design exhaust gas flow rate. For purposes of determining the combined emissions from kilns equipped with an alkali bypass or that exhaust kiln gases to a coal mill that exhausts through a separate stack, instead of installing a CEMS on the alkali bypass stack or coal mill stack, Lehigh may use the results of the initial and subsequent performance test to demonstrate compliance with the relevant emissions limit.

- (1) A brief description of the process and the air pollution control system;
- (2) Sampling location description(s);
- (3) A description of sampling and analytical procedures and any modifications to standard procedures;
- (4) Test results;
- (5) Quality assurance procedures and results;
- (6) Records of operating conditions during the performance test, preparation of standards, and calibration procedures;
- (7) Raw data sheets for field sampling and field and laboratory analyses;
- (8) Documentation of calculations;
- (9) All data recorded and used to establish parameters for monitoring; and
- (10) Any other information required by the performance test method.

A condition (B27) of the renewal permit that specifies this requirement will be revised.

- (b) (1) PM Emissions Tests. Lehigh must conduct performance testing using EPA method 5 or 51 from 40CFR Part 60 and must monitor continuous performance through use of a PM continuous parameter monitoring system (PM CPMS). Lehigh shall establish a site specific operating limit as per §63.1349(b)(1) paragraphs (i) through (ix). Conditions B27 and B28 contain these requirements.

(2) Opacity Tests. Lehigh currently conducts opacity testing on §63.1345 sources (sources other than kilns, clinker coolers, and new raw material dryers) at the frequency required in §63.1350(f). This requirement is contained at Conditions #B2, B27, C3, C5, D2, and D7.

(3) Dioxin/Furan Testing. These requirements are in the existing permit at Conditions B2 and B27.

(4) THC Emissions Test. Lehigh must operate a CEMS in accordance with requirements in §63.1350(i). For the purposes of conducting the accuracy and quality assurance evaluations for CEMS, the THC span value (as propane) is 50 to 60 ppmvw and the reference method (RM) is Method 25A to part 60 of this chapter. Use the THC CEMS to conduct the initial compliance test for the first 30 days of kiln operation after the compliance date of the rule. A performance test using Method 25A in 40CFR Part 60 appendix A is not required for the coal mill stack since kiln combustion air is not routed through it. THC is measured upstream of the coal mill. Condition B27 of the renewal permit contains this requirement. Initial testing has been completed.

(5) Mercury Emissions Tests. Lehigh must operate a mercury CEMs or a sorbent trap monitoring system in accordance with the requirements of §63.1350(k). The initial compliance test must be based on the first 30 kiln operating days in which the affected source operates using a mercury CEMS or a sorbent trap monitoring system after the compliance date of the rule. Initial testing has been completed. Condition B27 of the renewal permit contains this requirement.

(6) HCl Emissions Tests. Lehigh must conduct performance testing by one of the following methods:

(i)(A) If the source is equipped with a wet scrubber, tray tower or dry scrubber, you must conduct performance testing using Method 321 of appendix A to this part unless Lehigh has installed a CEMS that meets the requirements §63.1350(l)(1). For kilns with inline raw mills, testing must be conducted for the raw mill on and raw mill off conditions.

(B) Lehigh must establish site specific parameter limits by using the CPMS required in §63.1350(l)(1). For a wet scrubber or tray tower, measure and record the pressure drop across the scrubber and/or liquid flow rate and pH in intervals of no more than 15 minutes during the HCl test. Compute and record the 24-hour average pressure drop, pH, and average scrubber water flow rate for each sampling run in which the applicable emissions limit is met. For a dry scrubber, measure and record the sorbent injection rate in intervals of no more than 15 minutes during the HCl test. Compute and record the 24-hour average sorbent injection rate and average sorbent injection rate for each sampling run in which the applicable emissions limit is met.

(ii)(A) If the source is not controlled by a wet scrubber, tray tower or dry sorbent injection system, you must operate a CEMS in accordance with the requirements of §63.1350(l)(1). See §63.1348(a).

(B) The initial compliance test must be based on the 30 kiln operating days that occur after the compliance date of this rule in which the affected source operates using an HCl CEMS. Hourly HCl concentration data must be obtained according to §63.1350(l).

(iii) As an alternative to paragraph (b)(6)(i)(B) of this section, Lehigh may choose to monitor SO₂ emissions using a CEMS in accordance with the requirements of §63.1350(l)(3). You must establish an SO₂ operating limit equal to the average recorded during the HCl stack test where the HCl stack test run result demonstrates compliance with the emission limit. This operating limit will apply only for demonstrating HCl compliance. Condition B36 of the renewal permit contains this requirement. Initial source testing has been completed.

(v) As an alternative to paragraph (b)(6)(ii) of this section, the owner or operator may demonstrate initial compliance by conducting a performance test using Method 321 of appendix A to this part. You must also monitor continuous performance through use of an HCl CPMS according to paragraphs (b)(6)(v)(A) through (H) of this section. For kilns with inline raw mills, compliance testing and monitoring HCl to establish the site specific operating limit must be conducted during both raw mill on and raw mill off conditions.

(A) For your HCl CPMS, Lehigh must establish a 30 kiln operating day site-specific operating limit. If your HCl performance test demonstrates your HCl emission levels to be less than 75 percent of your emission limit (2.25 ppmvd @7% O₂), you must use the time weighted average HCl CPMS indicated value recorded during the HCl compliance test (typically measured as ppmvw HCl at stack O₂ concentration, but a dry, oxygen corrected value would also suffice), your HCl instrument zero output value, and the time weighted average HCl result of your compliance test to establish your operating limit. If your HCl compliance test demonstrates your HCl emission levels to be at or above 75 percent of your emission limit (2.25 ppmvd @7% O₂), you must use the time weighted average HCl CPMS indicated value recorded during the HCl compliance test as your operating limit. You must use the HCl CPMS indicated signal data to demonstrate continuous compliance with your operating limit.

Conditions B15 and B27 contain these requirements.

(7) Total Organic HAP emissions testing may be used instead of Total Hydrocarbons as specified in 40CFR63.1349(b)(4). This alternative testing will be allowed in revised permit conditions (B27 and B36).

(8) HCl emissions tests with SO₂ monitoring. This alternative for HCl compliance monitoring will be allowed in a new permit condition (B38) if Lehigh installs a wet scrubber, tray tower or dry scrubber.

(c) Performance Test Frequency. Lehigh conduct performance tests for PM every 12 months. Performance tests for Dioxin/Furan must be repeated every 30 months. Performance tests are not required to be repeated after the initial tests if monitored by CEMs. This requirement is contained in Condition B28 of the renewal permit.

(d) Reserved.

(e) Conditions of Performance Tests. Conduct performance tests under such conditions as the Administrator specifies to the owner or operator based on representative performance of the affected source for the period being tested. Upon request, you must make available to the Administrator such records as may be necessary to determine the conditions of performance tests. Condition (B30) contains this requirement.

63.1350 – Monitoring Requirements.

(a)

(1) Following the compliance date, Lehigh must demonstrate compliance with this subpart on a continuous basis by meeting the requirements this section.

(2) Reserved.

(3) For each existing unit that is equipped with a CMS, maintain the average emissions or the operating parameter values within the operating parameter limits established through performance tests.

(4) Any instance where Lehigh fails to comply with the continuous monitoring requirements of this section is a violation. This paragraph will be included as a condition (B31) of the renewal permit.

(b) PM Monitoring Requirements. Lehigh will use a PM CPMS to establish a site specific operating limit corresponding to the results of the performance test demonstrating compliance with the PM limit. Exceedances and violations of the site-specific limit shall be determined by the operation of the CPMS as detailed in §63.1350(b). Condition B32 of the renewal permit contains this requirement.

(c) Reserved.

(d) Clinker Production Monitoring Requirements. Hourly clinker production must be determined by one of two methods as listed in §63.1350(d). Condition B33 of the renewal permit contains this requirement.

(e) Reserved.

(f) Opacity Monitoring Requirements. These requirements are as they are contained in the existing permit and will remain in the renewal permit

(g) Dioxin/Furan Requirements. These requirements are as they are contained in the existing permit and will remain in the renewal permit.

(h) Monitoring Requirements for Sources Using Sorbent Injection. Lehigh received a District issued Authority to Construct for an Activated Carbon Injection System for the control of mercury only on September 15, 2015. By injecting activated carbon prior to filtration, mercury will be concentrated in the kiln dust collected by the main baghouse and transported out of the kiln system via the kiln dust shuttling system to the shipping department. Since this system is not used to demonstrate compliance with the dioxin/furan limit, it is not subject to the requirements of Section 63.1350 (h).

(i) THC Monitoring Requirements. Lehigh must comply with the monitoring requirements of paragraphs (i)(1) and (i)(2) and (m)1 through (m)(4) of §63.1350 to use this monitoring option. This requires Lehigh to operate the THC continuous emission monitoring system in accordance with Performance Specification 8 or Performance Specification 8A of 40CFR part 60 Appendix B and Appendix F. A performance test using Method 25A in 40CFR Part 60 appendix A is not required for the coal mill stack since kiln combustion air is not routed through it. Paragraphs (m)(1) through (m)(4) specify that the THC continuous monitoring system must be operated as a parameter monitoring system and requires the following:

- (1) Must complete one cycle of operation for each successive 15-minute period and have a minimum of four successive cycles of operation for a valid hour of data,
- (2) Must conduct all monitoring in continuous operation at all times that the unit is operating,
- (3) Determine the 1-hour block average of all recorded readings,
- (4) Record the results of each inspection, calibration, and validation check.

THC is measured upstream of the coal mill.

Condition B36 of the renewal permit contains these requirements.

(j) Total Organic HAP Monitoring Requirements. Lehigh may choose to comply with this limit instead of the Total Hydrocarbon (THC) limit. If Lehigh chooses this limit they must: continuously monitor THC according to paragraph (i)(1) and (2) or in accordance with Performance Specification 8 of appendix B to part 60 of this chapter and comply with all of the requirements for continuous monitoring systems found in the general provisions, subpart A of Part 63. Lehigh must operate and maintain each CEMS according to the quality assurance requirements in Procedure 1 of appendix F in part 60 of this chapter. In addition, Lehigh must follow the monitoring requirements in paragraphs (m)(1) through (m)(4) of section 63.1350. Lehigh must also develop an emissions monitoring plan in accordance with paragraphs (p)(1) through (p)(4) of section 63.1350.

Condition B36 will be modified to allow this option.

(k) Mercury Monitoring Requirements. Lehigh must install and operate a mercury continuous emissions monitoring system (Hg CEMS) in accordance with Performance Specification 12A (PS

12A) of appendix B to part 60 of this chapter or an integrated sorbent trap monitoring system in accordance with Performance Specification 12B (PS 12B) of appendix B to part 60 of this chapter. Lehigh must monitor mercury continuously according to paragraphs (k)(1) through (5) of this section. Lehigh must also develop an emissions monitoring plan in accordance with paragraphs (p)(1) through (4) of this section. Kiln combustion emissions are not vented through the coal mill so no mercury testing of the coal mill is required. The mercury testing requirements in §63.1350(k) (1) through (5) are contained in condition B37 of the renewal permit.

(l) HCl Monitoring Requirements. Lehigh must monitor HCl emissions continuously according to paragraph (l)(1) or (2) and paragraphs (m)(1) through (4) of this section or, if your kiln is controlled using a wet or dry scrubber or tray tower, you alternatively may parametrically monitor SO₂ emissions continuously according to paragraph (l)(3) of this section. You must also develop an emissions monitoring plan in accordance with paragraphs (p)(1) through (4) of this section. Lehigh may choose to operate an HCl CEMs and do so in accordance with Performance Specification 15 of appendix B to part 60 of Chapter 40 or, upon promulgation, in accordance with any other performance specification for HCl CEMs in appendix B of part 60 of this chapter. Condition B38 of the renewal permit requires the monitoring of HCl emissions in accordance with §63.1350 (l) (1) and (m)(1) through (m)(4).

(m) Parameter Monitoring Requirements. Parameter monitoring requirements are referenced in the appropriate monitoring requirements where direct CEMs are not used. The requirements include: (1) The CMS must complete a minimum of one cycle of operation for each successive 15-minute period. You must have a minimum of four successive cycles of operation to have a valid hour of data, (2) You must conduct all monitoring in continuous operation at all times that the unit is operating, (3) Determine the 1-hour block average of all recorded readings, and (4) Record the results of each inspection, calibration, and validation check. See Condition B39.

Emission monitoring requirements utilizing liquid flow rate monitoring, specific pressure monitoring, specific pH monitoring and mass flow rate for sorbent injection monitoring must be operated and maintained in accordance with Section 63.1350 (m). If Lehigh elects to use a fabric filter bag leak detection system for compliance with this Subpart, it must be installed, calibrated, maintained, and continuously operated as specified in paragraphs (m)(10)(i) through (viii) of Section 63.1350(m) of this Subpart. These requirements will be added to Condition B39 of the renewal permit.

(n) Continuous Flow Rate Monitoring System. Lehigh must install, operate, calibrate and maintain instruments, according to the requirements in paragraphs (n)(1) through (n)(10) of this section, for continuously measuring and recording the stack gas flow rate to allow determination of the pollutant mass emissions rate to the atmosphere from sources subject to an emissions limitation that has a pound per ton of clinker unit. This requirement is included in the existing permit at Conditions B22 and B40.

(o) Alternate Monitoring Requirements Approval. Lehigh may submit an application to the Administrator for the approval of alternate monitoring requirements to demonstrate compliance with the emission standards of this subpart, except for emission standards for THC, subject to the

provisions of paragraphs (o)(1) through (6) of this section. Condition B41 in the existing permit contains this requirement and will be retained for the renewal permit.

(p) Development and Submittal (Upon Request) of Monitoring Plans. Lehigh must develop a site specific monitoring plan according to the requirements in paragraphs (p)(1) through (4) of this section. Lehigh shall include the following CEMS and CMS in the plan:

PM CPMS

Clinker Production Monitoring Requirements

Opacity

Dioxin/Furan Monitoring

Monitoring Requirements for any Sorbent Injection

THC Monitoring Requirements

Total HAP Monitoring (if applicable)

Mercury Monitoring

HCl Monitoring

Stack Continuous Flow Rate Monitoring.

Additionally, any Bag Leak Detection System (BLDS) must have a monitoring plan and records must be maintained per Section 63.1350(p)(5). This requirement will be included in Condition B42.

Condition B42 will be retained in the renewal permit to assure compliance with this rule.

63.1351 – Compliance Dates.

The compliance date for existing sources for all the requirements that became effective on February 12, 2013, except for the open clinker storage pile requirements will be September 9, 2015. The compliance date for existing sources with the requirements of open clinker storage piles in §63.1343(c) is February 12, 2014.

63.1352 – Additional Test Methods.

Testing to determine MACT applicability may use alternative methods.

63.1353 – Notification Requirements.

(a) The notification provisions of 40CFR part 63, subpart A that apply and those that do not apply to Lehigh are listed in Table 1 of this subpart. If any State requires a notice that contains all of the information required in a notification listed in this section, the owner or operator may send the Administrator a copy of the notice sent to the State to satisfy the requirements of this section for that notification.

(b) Lehigh shall comply with the notification requirements in §63.9 as follows:

(1) Initial notifications as required by §63.9(b) through (d). For the purposes of this subpart, a Title V or 40CFR part 70 permit application may be used in lieu of the initial notification required under §63.9(b), provided the same information is contained in the permit application as required by §63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA. Permit applications shall be submitted by the same due dates as those specified for the initial notification.

(2) Notification of performance tests, as required by §§63.7 and 63.9(e).

(3) Notification of opacity and visible emission observations required by §63.1349 in accordance with §§63.6(h)(5) and 63.9(f).

(4) Notification, as required by §63.9(g), of the date that the continuous emission monitor performance evaluation required by §63.8(e) is scheduled to begin.

(5) Notification of compliance status, as required by §63.9(h).

(6) Within 48 hours of an exceedance that triggers retesting to establish compliance and new operating limits, notify the appropriate permitting agency of the planned performance tests. The notification requirements of §§63.7(b) and 63.9(e) do not apply to retesting required for exceedances under this subpart.

Condition B44 in the renewal permit includes these requirements.

63.1354 – Reporting Requirements.

(a) The reporting provisions of subpart A of this part that apply and those that do not apply to Lehigh are listed in Table 1 of this subpart. If any State requires a report that contains all of the information required in a report listed in this section, the owner or operator may send the Administrator a copy of the report sent to the State to satisfy the requirements of this section for that report.

(b) Lehigh shall comply with the reporting requirements specified in §63.10 of the general provisions of this part 63, subpart A as follows:

(1) As required by §63.10(d)(2), Lehigh shall report the results of performance tests as part of the notification of compliance status.

(2) As required by §63.10(d)(3), Lehigh shall report the opacity results from tests required by §63.1349.

(3) As required by §63.10(d)(4), Lehigh is required to submit progress reports as a condition of receiving an extension of compliance under §63.6(i) shall submit such reports by the dates specified in the written extension of compliance.

(4)-(5) [Reserved]

(6) As required by §63.10(e)(2), Lehigh shall submit a written report of the results of the performance evaluation for the continuous monitoring system required by §63.8(e). The owner or operator shall submit the report simultaneously with the results of the performance test.

(7) As required by §63.10(e)(2), Lehigh as the owner or operator of an affected source using a continuous opacity monitoring system to determine opacity compliance during any performance test required under §63.7 and described in §63.6(d)(6) shall report the results of the continuous opacity monitoring system performance evaluation conducted under §63.8(e).

(8) As required by §63.10(e)(3), Lehigh as the owner or operator of an affected source equipped with a continuous emission monitor shall submit an excess emissions and continuous monitoring system performance report for any event when the continuous monitoring system data indicate the source is not in compliance with the applicable emission limitation or operating parameter limit.

(9) Lehigh shall submit a summary report semiannually via electronic reporting (CEDRI) which contains the information specified in §63.10(e)(3)(vi). In addition, the summary report shall include:

(i) All exceedances of maximum control device inlet gas temperature limits specified in §63.1346(a) and (b);

(ii) All failures to calibrate thermocouples and other temperature sensors as required under §63.1350(g)(1) of this subpart; and

(iii) All failures to maintain the activated carbon injection rate, and the activated carbon injection carrier gas flow rate or pressure drop, as applicable, as required under §63.1346(c)(2).

(iv) The results of any combustion system component inspections conducted within the reporting period as required under §63.1347(a)(3).

(v) All failures to comply with any provision of the operation and maintenance plan developed in accordance with §63.1347(a).

(vi) For each PM, HCl, Hg, and THC CEMS, SO₂ CEMS or Hg sorbent trap monitoring system, within 60 days after the reporting periods, you must report all of the calculated 30-operating day rolling average values derived from the CPMS, CEMS, CMS, or Hg sorbent trap monitoring systems.

(vii) In response to each violation of an emissions standard or established operating parameter limit, the date, duration and description of each violation and the specific

actions taken for each violation including inspections, corrective actions and repeat performance tests and the results of those actions.

- (10) If the total continuous monitoring system downtime for any CEM or any continuous monitoring system (CMS) for the reporting period is ten percent or greater of the total operating time for the reporting period, Lehigh shall submit an excess emissions and continuous monitoring system performance report along with the summary report.
- (11) Initial performance test information is to be submitted with 60 days of test completion.
- (12) All reports required by this subpart not subject to the requirements in paragraphs (b)(9) introductory text and (b)(11)(i) of this section must be sent to the Administrator at the address listed in Section 63.13. The administrator or delegated authority may request a report in any form suitable for the specific case. The Administrator retains the right to require submittal of reports subject to paragraphs (b)(9) introductory text and (b)(11)(i) of this section in paper format.

(c) Reporting a failure to meet a standard due to a malfunction. For each failure to meet a standard or emissions limit caused by a malfunction at an affected source, you must report the failure in the semi-annual compliance report required by §63.1354(b)(9). The report must contain the date, time and duration, and the cause of each event (including unknown cause, if applicable), and a sum of the number of events in the reporting period. The report must list for each event the affected source or equipment, an estimate of the volume of each regulated pollutant emitted over the emission limit for which the source failed to meet a standard, and a description of the method used to estimate the emissions. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.1348(d), including actions taken to correct a malfunction.

Condition B45 will be revised to include the revision contained in this section.

63.1355 – Recordkeeping Requirements.

(a) Lehigh shall maintain files of all information (including all reports and notifications) required by this section recorded in a form suitable and readily available for inspection and review as required by §63.10(b)(1). The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site. The files may be maintained on microfilm, on a computer, on floppy disks, on magnetic tape, or on microfiche.

(b) Lehigh shall maintain records for each affected source as required by §63.10(b)(2) and (b)(3) of this part; and

- (1) All documentation supporting initial notifications and notifications of compliance status under §63.9;

(2) All records of applicability determination, including supporting analyses; and

(3) If Lehigh has been granted a waiver under §63.8(f)(6), any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements.

(c) In addition to the recordkeeping requirements in paragraph (b) of this section, Lehigh as the owner or operator of an affected source equipped with a continuous monitoring system shall maintain all records required by §63.10(c).

(d) Reserved

(e) Lehigh must keep records of the daily clinker production rates and kiln feed rates.

(f) Lehigh must keep records of the date, time and duration of each startup or shutdown period for any affected source that is subject to a standard during startup or shutdown that differs from the standard applicable at other times, and the quantity of feed and fuel used during the startup or shutdown period.

(g)(1) Lehigh must keep records of the date, time and duration of each malfunction that causes an affected source to fail to meet an applicable standard; if there was also a monitoring malfunction, the date, time and duration of the monitoring malfunction; the record must list the affected source or equipment, an estimate of the volume of each regulated pollutant emitted over the standard for which the source failed to meet a standard, and a description of the method used to estimate the emissions.

(2) Lehigh must keep records of actions taken during periods of malfunction to minimize emissions in accordance with §63.1348(d) including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

(h) For each exceedance from an emissions standard or established operating parameter limit, Lehigh must keep records of the date, duration and description of each exceedance and the specific actions taken for each exceedance including inspections, corrective actions and repeat performance tests and the results of those actions.

Condition B46 will be revised to align with recent changes to these requirements.

63.1356 – Sources with Multiple Emissions Limit or Monitoring Requirements.

If Lehigh has a different emissions limit or requirement for the same pollutant under another regulation in title 40 of this chapter, the owner or operator of the affected facility must comply with the most stringent emissions limit or requirement and is exempt from the less stringent requirement.

This requirement is conditioned into the renewal permit for particulate as specified in §63.1343 and §60.62.

63.1357 – Reserved

Condition B45 is to be removed from the renewal permit.

63.1358 – Implementation and Enforcement.

(a) This subpart can be implemented and enforced by the U.S. EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this subpart. Contact the applicable U.S. EPA Regional Office to find out if this subpart is delegated to a State, local, or Tribal agency.

(b) In delegating implementation and enforcement authority of this subpart to a State, local, or Tribal agency under subpart E of this part, the authorities contained in paragraph (c) of this section are retained by the Administrator of U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

(c) The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs (c)(1) through (4) of this section.

(1) Approval of alternatives to the requirements in §§63.1340, 63.1342 through 63.1348, and 63.1351.

(2) Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f), as defined in §63.90, and as required in this subpart.

(3) Approval of major alternatives to monitoring under §63.8(f), as defined in §63.90, and as required in this subpart.

(4) Approval of major alternatives to recordkeeping and reporting under §63.10(f), as defined in §63.90, and as required in this subpart.

Shasta County Air Quality Management District has been delegated implementation and enforcement authority for this subpart.

Condition B47 lists Shasta County Air Quality Management District as a delegated authority.

63.1359 – Reserved.

TABLE 1 TO SUBPART LLL OF PART 63—APPLICABILITY OF GENERAL PROVISIONS

Citation	Requirement	Applies to subpart LLL	Explanation
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63.1(a)(1)-(4)	Applicability	Yes	
63.1(a)(5)		No	[Reserved]
63.1(a)(6)-(8)	Applicability	Yes	
63.1(a)(9)		No	[Reserved]
63.1(a)(10)-(14)	Applicability	Yes	
63.1(b)(1)	Initial Applicability Determination	No	§63.1340 specifies applicability.
63.1(b)(2)-(3)	Initial Applicability Determination	Yes	
63.1(c)(1)	Applicability After Standard Established	Yes	
63.1(c)(2)	Permit Requirements	Yes	Area sources must obtain Title V permits.
63.1(c)(3)		No	[Reserved]
63.1(c)(4)-(5)	Extensions, Notifications	Yes.	
63.1(d)		No	[Reserved]
63.1(e)	Applicability of Permit Program	Yes	
63.2	Definitions	Yes	Additional definitions in §63.1341.
63.3(a)-(c)	Units and Abbreviations	Yes	
63.4(a)(1)-(3)	Prohibited Activities	Yes	
63.4(a)(4)		No	[Reserved]
63.4(a)(5)	Compliance date	Yes	
63.4(b)-(c)	Circumvention, Severability	Yes	
63.5(a)(1)-(2)	Construction/Reconstruction	Yes	
63.5(b)(1)	Compliance Dates	Yes	
63.5(b)(2)		No	[Reserved]
63.5(b)(3)-(6)	Construction Approval, Applicability	Yes	
63.5(c)		No	[Reserved]
63.5(d)(1)-(4)	Approval of Construction/Reconstruction	Yes	
63.5(e)	Approval of Construction/Reconstruction	Yes	
63.5(f)(1)-(2)	Approval of Construction/Reconstruction	Yes	
63.6(a)	Compliance for Standards and Maintenance	Yes	

63.6(b)(1)-(5)	Compliance Dates	Yes	
63.6(b)(6)		No	[Reserved]
63.6(b)(7)	Compliance Dates	Yes	
63.6(c)(1)-(2)	Compliance Dates	Yes	
63.6(c)(3)-(4)		No	[Reserved]
63.6(c)(5)	Compliance Dates	Yes	
63.6(d)		No	[Reserved]
63.6(e)(1)-(2)	Operation & Maintenance	No	See §63.1348(d) for general duty requirement. Any reference to §63.6(e)(1)(i) in other General Provisions or in this subpart is to be treated as a cross-reference to §63.1348(d).
63.6(e)(3)	Startup, Shutdown Malfunction Plan	No	Your operations and maintenance plan must address periods of startup and shutdown. See §63.1347(a)(1).
63.6(f)(1)	Compliance with Emission Standards	No	Compliance obligations specified in subpart LLL.
63.6(f)(2)-(3)	Compliance with Emission Standards	Yes	
63.6(g)(1)-(3)	Alternative Standard	Yes	
63.6(h)(1)	Opacity/VE Standards	No	Compliance obligations specified in subpart LLL.
63.6(h)(2)	Opacity/VE Standards	Yes	
63.6(h)(3)		No	[Reserved]
63.6(h)(4)-(h)(5)(i)	Opacity/VE Standards	Yes	
63.6(h)(5)(ii)-(iv)	Opacity/VE Standards	No	Test duration specified in subpart LLL.
63.6(h)(6)	Opacity/VE Standards	Yes	
63.6(h)(7)	Opacity/VE Standards	Yes	
63.6(i)(1)-(14)	Extension of Compliance	Yes	
63.6(i)(15)		No	[Reserved]
63.6(i)(16)	Extension of Compliance	Yes	
63.6(j)	Exemption from Compliance	Yes	
63.7(a)(1)-(3)	Performance Testing Requirements	Yes	§63.1349 has specific requirements.

63.7(b)	Notification period	Yes	Except for repeat performance test caused by an exceedance. See §63.1353(b)(6)
63.7(c)	Quality Assurance/Test Plan	Yes	
63.7(d)	Testing Facilities	Yes	
63.7(e)(1)	Conduct of Tests	No	See §63.1349(e). Any reference to 63.7(e)(1) in other General Provisions or in this subpart is to be treated as a cross-reference to §63.1349(e).
63.7(e)(2)-(4)	Conduct of tests	Yes	
63.7(f)	Alternative Test Method	Yes	
63.7(g)	Data Analysis	Yes	
63.7(h)	Waiver of Tests	Yes	
63.8(a)(1)	Monitoring Requirements	Yes	
63.8(a)(2)	Monitoring	No	§63.1350 includes CEMS requirements.
63.8(a)(3)		No	[Reserved]
63.8(a)(4)	Monitoring	No	Flares not applicable.
63.8(b)(1)-(3)	Conduct of Monitoring	Yes	
63.8(c)(1)-(8)	CMS Operation/Maintenance	Yes	Temperature and activated carbon injection monitoring data reduction requirements given in subpart LLL.
63.8(d)	Quality Control	Yes, except for the reference to the SSM Plan in the last sentence	
63.8(e)	Performance Evaluation for CMS	Yes	
63.8(f)(1)-(5)	Alternative Monitoring Method	Yes	Additional requirements in §63.1350(l).
63.8(f)(6)	Alternative to RATA Test	Yes	
63.8(g)	Data Reduction	Yes	
63.9(a)	Notification Requirements	Yes	
63.9(b)(1)-(5)	Initial Notifications	Yes	
63.9(c)	Request for Compliance Extension	Yes	
63.9(d)	New Source Notification for Special Compliance Requirements	Yes	
63.9(e)	Notification of performance test	Yes	Except for repeat performance test caused by an exceedance. See §63.1353(b)(6)

63.9(f)	Notification of VE/Opacity Test	Yes	Notification not required for VE/opacity test under §63.1350(e) and (j).
63.9(g)	Additional CMS Notifications	Yes	
63.9(h)(1)-(3)	Notification of Compliance Status	Yes	
63.9(h)(4)		No	[Reserved]
63.9(h)(5)-(6)	Notification of Compliance Status	Yes	
63.9(i)	Adjustment of Deadlines	Yes	
63.9(j)	Change in Previous Information	Yes	
63.10(a)	Recordkeeping/Reporting	Yes	
63.10(b)(1)	General Recordkeeping Requirements	Yes	
63.10(b)(2)(i)-(ii)	General Recordkeeping Requirements	No	See §63.1355(g) and (h).
63.10(b)(2)(iii)	General Recordkeeping Requirements	Yes	
63.10(b)(2)(iv)-(v)	General Recordkeeping Requirements	No	
63.10(b)(2)(vi)-(ix)	General Recordkeeping Requirements	Yes	
63.10(c)(1)	Additional CMS Recordkeeping	Yes	PS-8A supersedes requirements for THC CEMS.
63.10(c)(1)	Additional CMS Recordkeeping	Yes	PS-8A supersedes requirements for THC CEMS.
63.10(c)(2)-(4)		No	[Reserved]
63.10(c)(5)-(8)	Additional CMS Recordkeeping	Yes	PS-8A supersedes requirements for THC CEMS.
63.10(c)(9)		No	[Reserved]
63.10(c)(10)-(15)	Additional CMS Recordkeeping	Yes	PS-8A supersedes requirements for THC CEMS.
63.10(d)(1)	General Reporting Requirements	Yes	
63.10(d)(2)	Performance Test Results	Yes	
63.10(d)(3)	Opacity or VE Observations	Yes	
63.10(d)(4)	Progress Reports	Yes	
63.10(d)(5)	Startup, Shutdown, Malfunction Reports	No	See §63.1354(c) for reporting requirements. Any reference to §63.10(d)(5) in other General Provisions or in this subpart is to

			be treated as a cross-reference to §63.1354(c).
63.10(e)(1)-(2)	Additional CMS Reports	Yes	
63.10(e)(3)	Excess Emissions and CMS Performance Reports	Yes	Exceedances are defined in subpart LLL.
63.10(f)	Waiver for Recordkeeping/Reporting	Yes	
63.11(a)-(b)	Control Device Requirements	No	Flares not applicable.
63.12(a)-(c)	State Authority and Delegations	Yes	
63.13(a)-(c)	State/Regional Addresses	Yes	
63.14(a)-(b)	Incorporation by Reference	Yes	
63.15(a)-(b)	Availability of Information	Yes	

40 CFR Part 63 Subpart ZZZZ- National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Lehigh operates the following affected engines:

1 Detroit Model V-71 489 hp

5 Caterpillar Model ZW3516-CAT 2132 hp with Miratech Combikat Diesel Particulate Filters

These engines operate as emergency engines. These engines will have conditions in the renewal permit to assure they operate as emergency engines as defined in this subpart. They will also be required by these conditions to operate as outlined in the Operation and Maintenance Plan submitted by Lehigh to the District.

The summary compliance tables indicate the following:

1. No initial performance testing, operating limits or semiannual reporting is required.
2. Major Source emergency engines must Operate/Maintain engine and control device per manufacturer's instructions or owner-developed maintenance plan, may use oil analysis program instead of prescribed oil change frequency, must have hour meter and record hours of operation, keep maintenance records, and reporting and ultra-low sulfur diesel must be used for emergency demand response or local reliability.

3. Emergency engines less than 500 hp (this is the 489 hp Detroit Engine) must change oil/filter & inspect hoses/belts every 500 hours or annually; inspect air cleaner every 1,000 hours or annually.

Conditions in the draft renewal permit (E1 through 5) to assure compliance with these requirements remain similar to the conditions in the existing permit.

40 CFR Part 64 Compliance Assurance Monitoring

64.2 – Applicability.

Emissions units subject to National Emissions Standards for Hazardous Air Pollutants and less than 100 tons potential to emit are exempt. The Quarries and Crushing Department is subject to this Compliance Assurance Monitoring requirement.

64.3 – Monitoring Design Criteria.

Design, performance and evaluation criteria shall be incorporated into the Compliance Assurance Monitoring plan as specified in this section.

64.4 – Submittal Requirements.

The owner or operator shall submit to the District the following information within the plan:

1. The indicators to be monitored;
2. The ranges or designated conditions for such indicators;
3. The performance criteria for the monitoring to satisfy §64.3; and
4. If applicable, the indicator ranges and performance criteria for a CEMS, COMS or PEMS pursuant to §64.3(d).

Justification of the proposed elements of the monitoring must be included.

64.5 – Deadlines for Submittals.

The submittal shall be included with the renewal application for the part 70 permit.

64.6 – Approval of Monitoring.

The District shall be the approval authority for the submitted CAM plan.

64.7 – Operation of Approved Monitoring.

In response to excursions or exceedances of plan criteria, the owner or operator shall restore the operation of the emissions unit to normal operation as expeditiously as practicable.

64.8 – Quality Improvement Plan (QIP) Requirements.

The Administrator or the permitting authority may require the owner or operator to develop and implement a QIP.

64.9 – Reporting and Recordkeeping Requirements.

Reporting must be in accordance §70.6(a)(3)(iii) of Chapter 40 and included in the semi-annual

reporting.

64.10 – Savings Provisions.

Compliance with the emissions standards must be maintained regardless of the compliance with the CAM plan.

A condition requiring the implementation of the CAM plan as submitted by Lehigh and approved by the District shall be included in the Title V permit at the Quarries and Crushing section (Condition A7).

40 CFR Part 98 Mandatory Greenhouse Gas Reporting

Per EPA Guidance Document B-11-001, GHG Reporting Rule requirements are not considered applicable requirements under Title V regulations, and as such do not need to be included in the Title V Permit.

Prevention of Significant Deterioration (PSD) Permitting

This regulation sets the procedures for the review of new or modifications of existing major stationary emission sources. Since Lehigh Southwest Cement Company was issued a PSD permit as the Authority to Construct for the facility, the conditions of the Authority to Construct are incorporated in the proposed Title V permit unless a specific condition was revised (or added) in subsequently issued Permits to Operate.

Risk Management Plans Preparation and Registration, 112 (r)

Section 112(r), Accidental Release Prevention and Management Program, affects facilities at which certain substances are present above the specified annual threshold. Lehigh Southwest Cement Company, is not required to submit a 112(r) Risk Management Plan.

REQUIREMENTS THAT DO NOT APPLY:

Rule 2:4 Permit to Sell or Rent (Incinerators)

This rule pertains to the selling and or use of incinerators. There are no incinerators at this facility. Therefore, this requirement is not applicable to this facility.

Rule 2:8 Agricultural Burning

This rule applies only to agricultural burning operations. This facility does not conduct agricultural operations. Therefore, this requirement is not applicable to this facility.

Rule 3:03 Gasoline Loading and Transfer

This rule applies to retail service stations and bulk terminals only.

Rule 3:5 Agricultural Uses

This rule exempts discharges in the course of applying agricultural materials. This facility does not apply agricultural materials. Therefore, this requirement is not included in the proposed Title V permit.

Rule 3:12 Reduction of Matter of Animal Origin (Except Curing of Glue)

This rule mandates controls for reducing animal matter. Lehigh Southwest Cement Company does not reduce animal matter as part of the process. Therefore, this requirement is not included in the proposed Title V permit.

Rule 3:14 Petroleum Dry Cleaners

This rule mandates control and operating practices for dry cleaning operations. Lehigh Southwest Cement Company does not operate a dry cleaning machine at this facility. Therefore, this requirement is not included in the proposed Title V permit.

Rule 3:15 Cutback Asphalt

This rule requires that certain types of cutback asphalt not be used. Lehigh Southwest Cement Company does not apply cutback asphalt at this facility. Therefore, this requirement is not included in the proposed Title V permit.

New Source Performance Standards (NSPS) 40 CFR Part 60 Subpart Y Standards of Performance for Coal Preparation and Processing Plants

This standard applies to coal mills processing more than 200 short tons per day of coal. The Lehigh coal mill processes less than this daily amount and therefore this standard does not apply.

MACT Standards for Halogenated Solvent Cleaning Operations

This regulation requires degreasers using certain halogenated solvents to meet certain requirements. Because the degreaser does not use solvents regulated by the standard, the maximum achievable control technology (MACT) standard is not an applicable requirement for this facility. The permit is conditioned so that the permittee notify the District prior to changing the type of solvent used at the facility.

EXPIRATION DATE:
4-30-23

PERMIT NO:
02-VP-07a

SHASTA COUNTY
DEPARTMENT OF RESOURCE MANAGEMENT
AIR QUALITY MANAGEMENT DISTRICT

LEHIGH SOUTHWEST CEMENT COMPANY

(Applicant)

IS HEREBY GRANTED A
TITLE V OPERATING PERMIT
SUBJECT TO CONDITIONS NOTED

PORTLAND CEMENT MANUFACTURING

(Nature of Activity)

AT **15390 WONDERLAND BLVD., REDDING, CA**

(AP# 307-030-002-000)

DATE ISSUED: Draft July, 2019

APPROVED: _____
Air Pollution Control Officer

LEHIGH SOUTHWEST CEMENT COMPANY
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Key:

Air Pollution Control Officer (APCO)
Shasta County Air Quality Management District (District)
California Air Resources Board (CARB/ARB)
United States Environmental Protection Agency (US EPA/EPA)

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QUARRIES AND CRUSHING DEPARTMENT

EQUIPMENT UNDER PERMIT

Limestone Crusher (Allis-Chalmers) (B1)
Shale Crusher (C5)
Raise Shaft Sly Dust Collector (B13)
Limestone Belt Transfer Sly Dust Collector (B25)
Shale Crusher Sly Dust Collector (C36)
Secondary Crusher BHA Model 505-4220 Dust Collector (C34)
Transfer Building Sly Dust Collector (C38)
Pre-blending Dome Building
Shale 30" X 42" Jaw Crusher, (C168)
Quarry Drill (R116)
Portable Limestone Crushing Plant (Powerscreen USA, Model 1180 Premiertrak 500 TPH)
Portable Limestone Crushing Plant (Metso Minerals, Model LT106 400 TPH)

EMISSION LIMITS AND STANDARDS

- A1. The shale crusher (#C168) is subject to the provisions of the Federal Standards of Performance for Nonmetallic Mineral Processing Plants, 40 CFR Part 60.670 (Subpart OOO). Sufficient water shall be maintained in the shale crusher (#C168) and subsequent belt transfer points so as to prevent dust emissions from exceeding the limits in Condition A6.

[District Permit 85-PO-13i, Condition 17] [40 CFR Part 60.672(b) Table 3]

OPERATING CONDITIONS

- A2. The dust collectors shall be maintained and cleaned at a frequency so as to assure that Particulate matter emissions shall not exceed the maximum allowed under District Rule 3.2. Spare bags shall be kept on-site for immediate replacement of leaking or torn bags.

[District Permit 85-PO-13i, Condition 13]

- A3. All access and on-site road surfaces shall be paved, treated with a dust palliative agent, or watered on a daily basis as required to prevent fugitive dust emissions from leaving the

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property boundaries and causing a public nuisance or a violation of ambient air standards. The permittee shall maintain a log indicating the method used to comply with this condition and the frequency of treatment or water application.

[District Permit 85-PO-13i, Condition 14]

- A4. A water spray manifold shall be used at the shale/diatomaceous earth storage building so as to prevent fugitive dust emissions from leaving the property boundaries and causing a public nuisance or a violation of ambient air standards. The system shall be maintained in good repair and controlled by an automatic timer set with an operating frequency sufficient to meet this requirement. The permittee shall maintain a log indicating the water spray manifold operating frequency, adjustments made to the operating frequency and reason for change.

[District Permit 85-PO-13i, Condition 15]

- A5. The operation of the shale crusher #168 is only allowed during the months of October through May of each year. Any operation outside of this specified time period will require approval of the APCO.

[District Permit 85-PO-13i, Condition 18]

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TESTING, MONITORING AND REPORTING

A6. The following emission and operating limits apply:

AFFECTED SOURCE	POLLUTANT	PERFORMANCE TEST METHODS	EMISSION AND OPERATING LIMIT
PORTABLE LIMESTONE CRUSHERS	OPACITY	EPA Method 9	12 PERCENT ^a
LIMESTONE CRUSHER	OPACITY	EPA Method 9	40 PERCENT ^b
SHALE CRUSHER	PM OPACITY	EPA Method 5 EPA Method 9	0.10 gr/dscf ^b 40 PERCENT ^b
SHALE CRUSHER C168	OPACITY	EPA Method 9	15 PERCENT ^a
Openings to Conveyor Belt C164 Tunnel	OPACITY	EPA Method 9	7 PERCENT ^a
C168 TRANSFER POINTS	OPACITY	EPA Method 9	10 PERCENT ^a
<u>DUST COLLECTORS</u> B13 B25 C36 C34 C38	PM OPACITY	EPA Method 5 EPA Method 9	0.10 gr/dscf ^b 40 PERCENT ^b

^a The duration of the Method 9 observations must be 30 minutes (five 6-minute averages).

^b District Rule 3:2 for units existing before 7/1/86.

[District Permit 85-PO-13h and District Permit 85-PO-13i, Condition 21]; [40 CFR 60.672(b), 40 CFR 60.672(e)(1), 40 CFR 60.675(c)(3), 40 CFR Part 70.6 (a) and (c)]

A7. The permittee shall perform all the monitoring, recordkeeping, and other required functions delineated in the current version of the Lehigh Compliance Assurance Monitoring Plan (CAM Plan) on file with the District. The updated CAM Plan is included as Appendix 1 of this permit. Control device baghouses subject to this requirement are B13, B25, C36, and C38.

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- a. The CAM Plan requires daily (during operation) monitoring of manometer reading of Pressure Drop. Pressure Drop indicator range of 3-8 inches water is consistent with valid operation. An excursion of this range of Pressure Drop triggers a Method 22 visible emission evaluation and corrective action as specified in Section III of the Rationale for Selection of Indicator Ranges in the updated CAM Plan. The Pressure Drop indication manometer is to be maintained in working order and as per the manufacturer's specifications.
- b. Pressure Drop readings shall be recorded daily and include the following information:
 - 1. Date, place, and time
 - 2. Results
 - 3. Operating status

Records of Pressure Drop reading shall be retained on-site for a period of at least 5 years from the date of monitoring.

- c. All deviations from Pressure Drop indicator ranges must be reported in the 6 month Title V reports. Prompt reporting of deviation from CAM Plan requirements including those attributable to upset conditions as defined in the permit, the probable cause of such deviation, and any corrective actions or preventative measure taken. Prompt reporting is within 4 hours as defined in Condition F5.

[40 CFR Part 64.6(c)(3)]

- A8. Periodic (monthly) inspection of water sprays for Metso Minerals and Powerscreen USA portable crushers (or similar units up to 500 TPH) must be performed in accordance with 40 CFR 60.674(b) and 40 CFR 60.676(b) when the portable crushers are on-site.

[District Permit 85-PO-13h and District Permit 85-PO-13i, Condition 22]; [40 CFR 60.674(b), 40 CFR 60.676(b)]

RAW MILLING AND KILN DEPARTMENT

EQUIPMENT UNDER PERMIT

Cement In-Line Kiln/Raw Mill with Baghouse Dust Collector (S260)
Raw Mix Tanks Dust Collector (C172)
Clinker Handling Dust Collector (G418-1)

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Blending Silos Dust Collector (F173)
Raw Storage Silo Dust Collector (F184)
Pre-Heater Kiln Feed Bin Dust Collector (F350)
R-1 Silo Dust Collectors (G231 & G244)
Deep Bucket Conveyor Dust Collector (G425)
Roller Mill Rock Feeders Dust Collector (S210)
Bucket (meal) Elevator Dust Collector (S253)
Coal Unloading Facility
Coal Silo Dust Collector (G206)
Indirect Coal Firing System Dust Collector (G465)
Clinker Cooler (Closed System)
Secondary Fuel System
One Portable Silo with 250 WAM Dust Collector (G451)
Agricultural and MDF Fuels Silo (G228G)
Kiln Dust Shuttling System with Dust Collectors (D122, D124) and Silos (R1, D121)
Hydrated Lime Dry Sorbent Injection System with Silo and Dust Collector (G531)
Activated Carbon Injection System (G541)

EMISSION LIMIT AND STANDARDS

- B1. The opacity of the in-line kiln/raw mill stack (S260) and with respect to emissions resulting in a detached plume (other than condensed water vapor), the provisions of *California Health and Safety Code* Section 41701 shall apply at all times. This provision limits stack opacity to less than the equivalent of Ringelmann No. 2 on the Ringelmann Chart, (40 percent opacity), as published by the U.S. Bureau of Mines for any period or periods aggregation more than three (3) minutes in any one hour as determined by EPA Method 9. The owner/operator shall continuously employ at least one staff person at the facility site who maintains certification by the California Air Resources Board (ARB) as a Visible Emissions Evaluator capable of accurately discerning stack opacity.

[District Permit 85-PO-14n, Condition 13]; [District-Only]

- B2. The owner/operator shall demonstrate compliance with all provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Portland Cement Manufacturing Industry (40 CFR, Part 63, Subpart LLL). The following emission and operating limits apply:

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- B3. The visible emissions from the indirect coal firing system dust collector (G465) shall not exceed 10 percent opacity.

[Condition VIII.c.1.b., #NSR 4-4-4 SAC 78-01a.]

- B4. Sulfur Dioxide (SO₂) shall not be emitted from the kiln exhaust stack (S260) in excess of the following:

- a. 200 lbs/hr (in any block three-hour-averaged period beginning at midnight of each day),
- b. 2160 lbs/day (in any calendar day),
- c. 553 lbs/day (average in any calendar quarter),
- d. 100.9 tons/yr (rolling 12-month average).

[District Permit 85-PO-14n, Condition 16]; [Condition VII.b., #NSR 4-4-4 SAC 78-01a]

- B5. Oxides of nitrogen emissions from the kiln exhaust stack (S260) shall be limited to 5,940 lbs/day (in any calendar day) and 954 tons per year.

[District Permit 85-PO-14n, Condition 17]; [Condition VII.b., #NSR 4-4-4 SAC 78-01a]

- B6. Particulate matter emissions from the kiln exhaust stack (S260) shall be limited to the more stringent of the following:

- a. 17.9 pounds per hour (maximum two-hour average) during roller mill bypass;
and

[District Permit 85-PO-14n, Condition 18]; [Condition VII.b., #NSR 4-4-4 SAC 78-01a]

- b. 17.2 pounds per hour (maximum two-hour average) during roller mill operation.

[District Permit 85-PO-14n, Condition 18]; [Condition VII.b., #NSR 4-4-4 SAC 78-01a]

- c. 0.07 pounds per ton of clinker (dry basis).

Compliance with this condition shall be determined by a source test using the EPA Method 5 or 5I, (front half only).

[40 CFR Part 60.62(a)(1)]; [District Permit 85-PO-14n, Condition 18, 40 CFR Part 63.1349]

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- B7. Carbon monoxide emissions from the kiln exhaust stack (S260) shall be limited to 30,226 lbs/day (in any calendar day) and 5,067 tons per year.

[District Permit 85-PO-14n, Condition 19]; [Condition VII.b., #NSR 4-4-4 SAC 78-01a]

- B8. Total hydrocarbon emissions as propane shall be limited to 684 lbs/day (in any calendar day) and 48 tons per year.

[District Permit 85-PO-14n, Condition 20]; [Condition VII.b., #NSR 4-4-4 SAC 78-01a]

- B9. The total Particulate matter emissions from the clinker handling dust collector (G418-1) shall be limited to 0.04 gr/dscf. All other dust collectors except the cement kiln baghouse dust collector (S260), (See condition B6), listed under this permit shall be limited to a Particulate matter emission rate that is allowed under District Rule 3:2, depending upon date of construction or modification. Spare bags shall be kept on-site, as necessary, to assure immediate replacement of leaking or torn bags. The APCO may request emission testing of these dust collectors to verify compliance with these emission limits.

[District Permit 85-PO-14n, Condition 25]; [District Rule 2:11]

- B10. The owner/operator shall not cause to be discharged into the atmosphere from any thermal dryer serving the coal mill gases which contain Particulate matter in excess of 0.15 gr/dscf. The APCO may request emission testing of these dust collectors to verify compliance with these emission limits.

[District Rule 3:2]; [District Rule 2:11]

- B11. The owner/operator shall not cause to be discharged into the atmosphere from any thermal dryer serving the coal mill, any coal processing and conveying equipment, coal storage system, or coal transfer and loading system, gases which exhibit 20 percent opacity or greater.

[District Rule 3:2]

- B12. Compliance must be demonstrated with either the Total Hydrocarbon limit or the Total Organic HAP limit by using a CEMS in accordance with §63.1350(i) and operated according to Performance Specification 8 or 8A of 40 CFR Part 60 Appendix B. The span value in the relative accuracy test must be 50 ppmvd as propane and the reference method for the annual RATA is Method 25A of 40 CFR Part 60 Appendix A.

[40 CFR Part 63.1348(a)(4)]

- B13. Compliance must be demonstrated with the mercury emissions limit by using either a Mercury CEMS or a sorbent trap monitoring system in accordance with the requirements

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of 40 CFR Part 63.1350(k). An exhaust gas flow rate measuring system must also be operated in accordance with the requirements in 40 CFR Part 63.1350(k)(5).

[40 CFR Part 63.1348(a)(5)]

- B14. Compliance must be demonstrated with the HCl emissions limit by using either an HCl CEMS if the source is not controlled by a wet scrubber, tray tower, or dry sorbent injection system. The CEMS must be operated in accordance with 40 CFR Part 63.1350(l)(1) and Performance Specification 15 in 40 CFR Part 60 Appendix B or any other promulgated specification for HCl CEMS in 40 CFR Part 60 Appendix B. Method 321 or Appendix A to 40 CFR Part 63 must be used as the reference method. Applicable procedures in 40 CFR Part 63.1350(l) also apply to the operation of this HCl CEMS.

If HCl emissions are controlled by a wet scrubber, tray tower or dry scrubber, the HCl emissions limit compliance may be demonstrated by installing, operating, and maintaining a CEMS to monitor wet scrubber or tray tower parameters, as specified in paragraphs (m)(5) and (7) of §63.1350 and dry scrubber, as specified in paragraph (m)(9) of §63.1350.

If HCl emissions are controlled by a wet scrubber, tray tower or dry scrubber, the HCl emissions limit compliance may be demonstrated using SO₂ parametric monitoring in accordance with 40 CFR Part 60.1350(l)(3).

Alternatively, HCl emission compliance may be demonstrated using an HCl CPMS in accordance with 40 CFR 63.1349(b)(6)(v).

[40 CFR Part 63. 1349(b)(6)]

- B15. Continuous Monitoring Requirements. Lehigh must demonstrate compliance with the emissions standards and operating limits by using the performance test methods and procedures in §63.1350 and §63.8 for each affected source.
- a. General Requirements. Lehigh must monitor and collect data according to §63.1350 and the site specific monitoring plan required by §63.1350(p). Except for periods of startup and shutdown, monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, calibration checks and required zero and span adjustments), Lehigh must operate the monitoring system and collect data at all required intervals at all times the affected source is operating. Lehigh must maintain, for each existing unit that is equipped with a Continuous Monitoring System (CMS), the average emissions or operating parameter values within the operating parameter limits established through performance tests. Lehigh may not use data recorded during monitoring system malfunctions, or required monitoring system quality assurance or control activities in calculations used

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to report emissions or operating levels. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions. Lehigh must use all the data collected during all other periods in assessing the operation of the control device and associated control system. Lehigh must determine hourly clinker production rates according to the requirements at §63.1350(d).

- b. PM Compliance. Continuous PM compliance must be demonstrated using the monitoring methods and procedures in §63.1350(b) and (d).
- c. Opacity Compliance. Monitoring is required to be performed at all sources subject to an opacity limit. The monitoring methods and procedures in §63.1350(f) based on the maximum 6-minute average opacity exhibited during the performance test period must be used. Corrective actions must be initiated within one hour of detecting visible emissions above the applicable limit.
- d. Dioxin/Furan (D/F) Compliance. Lehigh must implement a temperature CMS that is operated, installed and maintained to record the temperature of specified gas streams in accordance with the requirements of §63.1350(g). Compliance is determined by calculating the rolling three-hour average temperature using the average of 180 successive one-minute average temperatures. When the operating status of the raw mill of the in-line kiln/raw mill is changed from off to on or from on to off, the calculation of the three-hour rolling average temperature must begin anew, without considering previous recordings.
- e. Activated Carbon Injection Compliance. If Lehigh chooses to use active carbon injection as an emission control technique to comply with a D/F emission limitation, the monitoring requirements at §63.1350(h)(1) and (h)(2) and paragraphs (m)(1) through (m)(4) and (m)(9) must be used for compliance. Lehigh must also develop an emissions monitoring plan in accordance with paragraphs (p)(1) through (p)(4) of §63.1350.
- f. THC Compliance. Lehigh must demonstrate compliance with the THC limit in §63.1343 which is the 24 ppmvd @7 percent O₂ or the Total Organic HAP limit in §63.1343 which is 12 ppmvd @7 percent O₂. The monitoring methods and procedures in §63.1350(i) or (j) will be used. THC or Total Organic HAP will be measured upstream of the coal mill.
- g. Mercury Compliance. Lehigh will be required to use the monitoring methods and procedures in §63.1350(k) to demonstrate continuous mercury emissions compliance. Mercury will be measured upstream of the coal mill.

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- h. HCl Compliance. Lehigh must be in compliance using the performance test methods and procedures in §63.1349(b)(6) and §63.1350(1)(1). HCl will be measured upstream of the coal mill.

[40 CFR.1348(b)][40 CFR Part 63.1350]

OPERATING CONDITIONS

- B16. The clinker cooler air is to serve as burning system combustion air.

[District Permit 85-PO-14n, Condition 14]; [40 CFR Part 60.62(b)]

- B17. The existing crane way building is to be maintained to prevent fugitive dust emissions from leaving the property boundaries and causing a public nuisance.

[District Permit 85-PO-14n, Condition 15]

- B18. Auxiliary burner capability, to be available in stand-by mode, shall be utilized in the pre-calciner section of the cement kiln in order to minimize the necessity to increase burning at the main burner when loss of rubber tires occurs.

[District Permit 85-PO-14n, Condition 24]

- B19. Exhaust gases from the indirect coal firing system shall be directed through baghouses prior to venting to the atmosphere. The baghouses for these facilities shall meet the following specifications:

- a. Pressure gauges shall be installed on each compartment of each baghouse.
- b. The visible emissions from the baghouse shall not exceed 10 percent opacity.
- c. Air to cloth ratio shall not exceed 8.0 cfm/ft².

[Condition VII.c.1., #NSR 4-4-4 SAC 78-01a, 40 CFR Part 60.254(a)]

- B20. Open clinker storage piles shall be managed per the requirements contained in the current "Open Clinker Storage Piles Supplement to Operation and Maintenance Plan" on file with the District. Any open clinker storage pile not described in the Open Clinker Storage Pile Supplement is a temporary pile and must be cleaned up within 3 days.

[40 CFR Part 63.1343(c)]

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- B21. During periods of startup and shutdown Lehigh must meet the requirements listed in (g)(1) through (4) of this section.
- a. During startup Lehigh must use any one of combination of the following clean fuels: natural gas, synthetic natural gas, propane, distillate oil, synthesis gas (syngas), and ultra-low sulfur diesel (ULSD) until the kiln reaches a temperature of 1200 degrees Fahrenheit.
 - b. Combustion of the primary kiln fuel may commence once the kiln temperature reaches 1200 degrees Fahrenheit.
 - c. All air pollution control devices must be turned on and operating prior to combusting any fuel.
 - d. Keep records as specified in §63.1355 during periods of startup and shutdown.

[40 CFR Part 63.1346]

TESTING, MONITORING AND REPORTING REQUIREMENTS

- B22. The operator shall maintain, calibrate, and operate the following continuous emission monitors for the kiln stack (S260) emissions at all times when the kiln is in operation:
- a. Stack gas carbon monoxide monitor
 - b. Stack gas oxides of nitrogen monitor;
 - c. Stack gas sulfur dioxide monitor;
 - d. Stack flow rate;
 - e. Stack gas mercury continuous emissions monitor*;
 - f. Stack gas THC monitor or Total Organic HAP monitor systems;
 - g. Stack gas HCl monitor or parametric monitoring system;
 - h. Stack gas PM Continuous Parametric Monitoring System (PM CPMS).

*An integrated sorbent trap mercury monitoring system may be used instead of a mercury CEMS.

These devices shall meet all applicable design and quality assurance requirements specified in *Federal Register*, 40 CFR Part 60.13 and 40 CFR 60, Appendix B

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and F, and 40 CFR Part 63.1350. A computer facility shall be utilized which has the capability of interpreting the sampling data and producing a printout of the corrected average hourly and daily emission concentrations and mass emission rates. This data shall be archived and available for inspection upon request by the Air Pollution Control Officers (APCO) for a period of five (5) years.

[District Permit 85-PO-14n, Condition 21]; [Condition VII.d., #NSR 4-4-4 SAC 78-01a]; [SCAQMD Rule 5]; [40 CFR Part 60.63(c)(2)]; [40 CFR Part 60.63(h)]; [40 CFR Part 63.1350]

- B23. Monthly kiln stack (S260) emission reports shall be required to be submitted to the District by the 15th of the month following the month recorded and shall include:
- a. Daily and monthly total NO_x, SO₂, THC and CO emissions expressed in pounds/day and pounds/month.
 - b. Summary of all calendar days exceeding the permit limitations of 5,940 lbs/day of oxides of nitrogen, and the reason for the excursion.
 - c. Summary of all calendar days exceeding the permit limitations of 30,226 lbs/day of carbon monoxide, and the reasons for the excursion.
 - d. Summary of all calendar days exceeding the permit limitation of 249 lbs/day of total hydrocarbon, as methane, and the reasons for the excursion. This summary is to be based upon the most recent source test and monthly roller mill operating times.
 - e. Summary of all calendar days exceeding the permit limitation of 688 lbs/day of total hydrocarbon, as propane, and the reasons for the excursion.
 - f. Summary of all calendar days exceeding the permit limitation of 2,160 lbs/day of SO₂, and of all three (3) hour averaged periods exceeding the permit limit of 200 lbs/hr of SO₂, and the reasons for such excursions.
 - g. Summary of all periods when there has been a malfunction of any air pollution control equipment, when a continuous monitoring system or monitoring device was not functioning, or when any venting of emissions occurred from affected facilities specified in 40 CFR Part 60.60 directly to the atmosphere and the reason for the same.
 - h. Daily production rates and kiln feed rates. Record daily production rates and kiln feed rates. Calibrate, maintain, and operate a permanent weigh scale system to measure and record the amount of kiln feed in tons of mass per hour. The system must be maintained within +/- 5% accuracy. Calculate hourly clinker production rate using a kiln-specific feed-to-clinker ration

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based on reconciled clinker production rats determined for accounting purposes and recorded feed rates. This ratio should be reviewed monthly and updated as necessary.

- i. Average medium density fiberboard (MDF) and/or agricultural fuel usage in tons/hr and total hours of MDF usage.

[District Permit 85-PO-14n, Condition 22]; [40 CFR Parts 60.7, 60.63(a)(b), 60.65(a), 60.65(c), 63.1350(d)]

- B24. Natural gas, coal, medium density fiberboard, (MDF), and coke are the only fuels authorized for use by the kiln main burner. The maximum rate of use of medium density fiberboard shall be 7.0 tons/hr based on monthly MDF receipts and inventory change. Rice hulls, almond shells, and wood chips are approved for use as fuel replacing medium density fiberboard. Rubber tires are authorized as an auxiliary fuel in the feed end of the kiln. The use of all auxiliary fuels shall be approved by the APCO. The owner/operator is required to notify the District should any fuel changes be anticipated for any portion of the raw milling and kiln department. Any changes in fuel type or permanent change in fuel feed rate may require that an updated report be submitted in accordance with the Air Toxic Hot Spots Act; (AB2588).

[District Permit 85-PO-14n, Condition 23]

- B25. Periodic emission testing for Particulate matter (PM) shall be required according to the schedule outlined in District Rule 2:11.a.3.f below. Results of all stack tests shall be forwarded to the District for compliance verification. The performance tests shall be conducted on the kiln/roller mill stack (S260). Performance tests for the emissions of PM shall be conducted and the results reported in accordance with Part 60.8 and Method 5 or 5I (front half) of Appendix A of 40 CFR 60. In addition, the back half of CARB Method 5 of the particulate sampling train shall be reported to the District for emission inventory purposes. The required Method 5 or 5I (front half) performance test must be used to establish a site specific operating limit for the PM continuous parametric monitoring system that must be updated every 12 months (but no more than 13 months after the previous performance test).

The District shall be notified at least thirty (30) days in advance of such test to allow an observer to be present.

<u>Emissions (tons/year)</u>	<u>Test Schedule</u>
Less than 25 tons/yr	Voluntary, or at request of District for enforcement purposes
25 or more, but less than 50	Once every 3 years

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50 or more,
but less than 100 Once every 2 years

100 or more Once every year

[Condition VII.a., #NSR 4-4-4 SAC 78-01a.]; [District Rule 2:11.a.3.f.]; [40 CFR Part 60.63(c)(1)(2)]

- B26. The owner/operator of any thermal dryer service a coal mill shall install, calibrate, maintain, and continuously operate a monitoring device for the measurement of the temperature of the gas stream at the exit of the thermal dryer on a continuous basis. The monitoring device is to be certified by the manufacturer to be accurate within +/- 3 degrees Fahrenheit.

[40CFR Part 60.256(a)(1)]

- B27. The owner/operator shall comply with all applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Portland Cement Manufacturing Industry (40 CFR, Part 63, Subpart LLL). Performance test reports must be submitted to the District within 60 days of the completion of sampling.

The following testing and monitoring requirements apply:

AFFECTED SOURCE/POLLUTANT OR OPACITY	TESTING TYPE/OPERATION/PROCESS	MONITORING REQUIREMENTS
ALL AFFECTED SOURCES	OPERATIONS AND MAINTENANCE PLAN [40 CFR 63.1347]	PREPARE WRITTEN PLAN FOR ALL AFFECTED SOURCES AND CONTROL DEVICES AND SUBMIT FOR APPROVAL [40 CFR 63.1347].
IN-LINE KILN/RAW MILL (PARTICULATE MATTER)	EPA METHOD #5 OR 51 INITIALLY AND REPEATED ANNUALLY; AND ESTABLISH SOURCE SPECIFIC OPERATING LIMIT USING A PARAMETRIC MONITORING SYSTEM [40 CFR 63.1349(b)(1)]	PM CPMS WITH SOURCE SPECIFIC OPERATING LIMIT [40 CFR 63.1350(b)]
IN-LINE KILN/RAW MILL (DIOXIN/FURAN)	EPA METHOD #23, REPEATED EVERY 2.5 YEARS (NO MORE THAN 31 MONTHS); AND ESTABLISH SOURCE SPECIFIC OPERATING LIMIT USING CONTINUOUS TEMPERATURE MONITORING AT PMCD INLET [40 CFR 63.1349(b)(3)].	TEMPERATURE CMS TO RECORD TEMPERATURE AT INLET TO PMCDs [40 CFR 63.1350(g) and 40 CFR 63.1350(m)]

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AFFECTED SOURCE/POLLUTANT OR OPACITY	TESTING TYPE/OPERATION/PROCESS	MONITORING REQUIREMENTS
IN-LINE KILN/RAW MILL (MERCURY)	COMPLIANCE BASED ON A 30 KILN OPERATING DAY ROLLING AVERAGE BASIS, UPDATED AT THE END OF EACH NEW KILN OPERATING DAY, USING A MERCURY CEMS OR SORBENT TRAP SYSTEM. [40 CFR 63.1349(b)(5)]	MERCURY CEMS OR SORBENT TRAP MONITORING SYSTEM [40 CFR 63.1350(k)]
IN-LINE KILN/RAW MILL TOTAL HYDROCARBON OR TOTAL ORGANIC HAP	COMPLIANCE BASED ON A 30 KILN OPERATING DAY ROLLING AVERAGE BASIS, UPDATED AT THE END OF EACH NEW KILN OPERATING DAY, USING A TOTAL HYDROCARBON CEMS; OR EPA METHOD 320, METHOD 18, OR COMBINATION REPEATED EVERY 30 MONTHS (NO MORE THAN 31 MONTHS) AND ESTABLISH SOURCE SPECIFIC OPERATING LIMIT USING THC CPMS 40 CFR 63.1349(b)(4) or 40 CFR 63.1349(b)(7)	THC CEMS; OR THC CPMS WITH SOURCE SPECIFIC OPERATING LIMIT 40 CFR 63.1350(i) or 40 CFR 63.1350(j) and 40 CFR 63.1350(m)
IN-LINE KILN/RAW MILL (HYDROGEN CHLORIDE)	COMPLIANCE BASED ON A 30 KILN OPERATING DAY ROLLING AVERAGE BASIS, UPDATED AT THE END OF EACH NEW KILN OPERATING DAY, USING A HCl CEMS; OR EPA METHOD 321 REPEATED EVERY 30 MONTHS (NO MORE THAN 31 MONTHS) AND ESTABLISH SOURCE SPECIFIC OPERATING LIMIT USING A PARAMETRIC MONITORING SYSTEM [40 CFR 63.1349(b)(6)]	HCl CEMS; OR CPMS WITH SOURCE SPECIFIC OPERATING LIMIT [40 CFR 63.1350(l) and 40 CFR 63.1350(m)]
ALL AFFECTED MATERIAL HANDLING PROCESSES ^d	EPA METHOD #9 ^a EPA METHOD #22 ^b	MONTHLY (OR AS SPECIFIED IN PLAN)

^a. 10-minute Method 22 visible emission test required initially and monthly thereafter. If visible emissions are observed, (must conduct 30 minutes of opacity observations, recorded at 15-second intervals, in accordance with Method 9, must begin within one hour. The frequency of monthly Method 22 readings may be reduced to semi-annual if no visible emissions are observed for 6 consecutive monthly tests. [See 40 CFR 63.1350(f)(f)(1) for other procedures and allowances] Opacity readings must be reported to the District with the semi-annual report required by condition F7.

^b. Includes raw material storage, conveyor transfer points, and bulk loading and unloading systems. 40 CFR part 63.1345

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- B28. Performance tests for PM must be repeated every 12 months (but no more than 13 months after the previous performance test). Performance test for Dioxin/Furan must be repeated every 30 months. Performance test for Total Organic HAP or HCl where parametric monitoring is used must be repeated every 30 months (but no more than 31 months after the previous performance test). Performance tests are not required to be repeated after initial testing if monitored by CEMS.

[40 CFR Part 63.1349(c)]

- B29. Reserved

- B30. Conduct performance tests under such conditions as the Administrator specifies to Lehigh based on representative performance of the affected source for the period being tested. Upon request, Lehigh must make available to the Administrator such records as may be necessary to determine the conditions of performance tests.

[40 CFR Part 63.1349(e)]

- B31. Lehigh must demonstrate compliance with Subpart LLL on a continuous basis by meeting requirements of §63.1350. For each existing unit that is equipped with a Continuous Monitoring System (CMS), maintain the average emissions or the operating parameter values within the operating parameter limits established through performance tests. Any instance where the owner or operator fails to comply with the continuous monitoring requirements of §63.1350 is a violation.

[40 CFR Part 63.1350(a)] [40 CFR Part 63.1348(b)(1)]

- B32. A PM Continuous Parameter Monitoring System (PM CPMS) shall be used according to §63.1350(b) to demonstrate continuous compliance with the PM emissions standard. A site-specific operating limit must be established based on a performance test using either Method 5 or 5I, at Appendix A-3 to 40 CFR Part 60. Continuous compliance is determined on a 30 kiln operating day rolling average basis, updated at the end of each new kiln operating day. Corrective action is required for any exceedance of the 30 process operating day PM CPMS average value from the established parameter limit.

[40 CFR Part 63.1350(b)] [40 CFR Part 60.63(g)] [40 CFR Part 63.1348(b)(2)]

- B33. Clinker production monitoring is required to be performed per the methods that are prescribed in §63.1350(d). Calibrate, maintain, and operate a permanent weigh scale system to measure and record in tons-mass per hour of the amount of clinker produced or the amount of feed to the kiln. The system must be maintained within +/- 5% accuracy. If kiln feed is used, then a kiln-specific feed to clinker ratio must be calculated and updated monthly per §63.1350(d).

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[40 CFR Part 63.1350(d)] [40 CFR Part 63.1348(b)(1)]

- B34. Opacity monitoring is required to be performed at all material handling operations per the methods and frequency that are prescribed in §63.1350(f)(1).

[40 CFR Part 63.1350(f)] [40 CFR Part 60.1348(b)(3)]

- B35. Temperature monitoring is required to demonstrate continuous compliance with the D/F emissions standard. Lehigh must operate a CMS to continuously record the temperature of the exhaust gases from the kiln at the inlet to, or upstream of, the kiln PMCD. Compliance is determined by calculating the rolling three-hour average temperature using the average of 180 successive one-minute average temperatures. When the operating status of the raw mill of the in-line kiln/raw mill is changed from off to on or from on to off, the calculation of the three-hour rolling average temperature must begin anew, without considering previous recordings.

[40 CFR Part 63.1350(g)] [40 CFR Part 60.1348(b)(4)]

- B36. Total Hydrocarbon Monitoring is required to be performed by continuously using a CEMS in accordance with Performance Specifications 8 or 8A of Appendix B to 40 CFR 60. The THC CEMS must operate and be maintained according to the quality assurance requirements in Procedure 1 of Appendix F in 40 CFR Part 60. The CEMS must be operated according to the parameter monitoring requirements section fully described in §63.1350(m)(1) through (m)(4) if monitoring for Total Organic HAP. Lehigh must also develop an emissions monitoring plan in accordance with paragraphs (p)(1) through (p)(4) of section 63.1350.

[40 CFR Part 63.1350(i)(j)] [40 CFR Part 63.1348(b)(5)(6)]

- B37. A Mercury Continuous Emissions Monitoring System (Hg CEMS) must be installed and operated in accordance with Performance Specification 12A (PS 12A) of Appendix B to 40 CFR Part 60 or an integrated sorbent trap monitoring system installed and operated in accordance with Performance Specification 12B (PS 12B) of Appendix B to 40 CFR Part 60. Mercury emissions must be continuously monitored according to paragraphs (k)(1) through (5) of §63.1350.

A mercury integrated sorbent trap monitoring system may be used in place of the mercury CEMS and must be operated at all times other than kiln startup and shutdown (startup and shutdown are as defined in §63.1341). Lehigh must also develop an emissions monitoring plan in accordance with paragraphs (p)(1) through (4) of this section.

Kiln combustion emissions are not vented through the coal mill so no mercury testing of the coal mill is required.

[40 CFR Part 63.1350(k)] [40 CFR Part 63.1348(b)(7)]

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- B38. HCl emissions must be continuously monitored from the kiln stack. Monitoring may occur by either the use of an HCl CEMS operated in accordance with Performance Specification 15 or PS18 of Appendix B to Part 60 of Title 40 or, upon promulgation, in accordance with any other performance specification for HCl CEMS in Appendix B to 40 CFR 60. The quality assurance requirement in Procedure 1 of Appendix F to 40 CFR 60 must be used for the HCl CEMS.

If a wet or dry scrubber or tray tower is used for HCl control then a SO₂ emissions monitoring may be used to parametrically monitor HCl emissions. SO₂ monitoring must be in accordance with §63.1350(1)(3). Parametric monitoring of a wet scrubber, tray tower, or dry scrubber may also be utilized instead of a SO₂ emissions parametric monitoring system by the installation, operation, and maintenance of a CMS to monitor applicable parameters as specified in §63.1350(m)(5), (7), and (9).

[40 CFR Part 63.1350(1)] [40 CFR Part 63.1348(b)(8)]

- B39. For all continuous parameter monitoring requirements where a direct measuring CEMS is not used, the requirements of §63.1350(m) shall apply. The continuous monitoring system (CMS) must complete a minimum of one cycle of operation for each successive 15-minute period and must have four successive cycles of operation to have a valid hour of data. Monitoring must be conducted in continuous operation at all times that the unit is operating. The 1-hour block average must be determined for all recorded readings. Record the results of each inspection, calibration, and validation check.

Emission monitoring requirements utilizing liquid flow rate monitoring, specific pressure monitoring, specific pH monitoring and mass flow rate for sorbent injection monitoring must be operated and maintained in accordance with Section 63.1350(m). If Lehigh elects to use a fabric filter bag leak detection system for compliance with this Subpart, it must be installed, calibrated, maintained, and continuously operated as specified in paragraphs (m)10(i) through (viii) of Section 63.1350(m) of this Subpart.

[40 CFR Part 63.1350(m)]

- B40. The kiln stack continuous flow rate monitoring system must meet the requirements as set forth in §63.1350(n). The flow rate monitoring system must operate and record data during all periods of operation of the affected facility including periods of startup, shutdown and malfunction, except for periods of monitoring system malfunctions, repairs associated with monitoring system malfunctions, and required monitoring system quality assurance or quality control activities (including, as applicable, calibration checks and required zero and span adjustments).

[40 CFR Part 63.1350(n)]

- B41. An application for alternate monitoring requirements to demonstrate compliance with the emissions standards of Subpart LLL may be submitted to the EPA Administrator and be

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subject to the provisions of §63.1350(o).

[40 CFR Part 63.1350(o)]

- B42. Development and Submittal (upon request) of monitoring plans must be done in accordance with §63.1350(p). The monitoring plan must cover the following required performance stack testing and other monitoring systems: PM CPMS, Clinker Production Monitoring Requirements, Opacity, Dioxin/Furan Testing, Monitoring Requirements for any sorbent Injection, THC monitoring requirements, Total HAP monitoring (if applicable), Mercury monitoring, HCl monitoring, and Stack continuous flow monitoring. Additionally, any bag leak detection system must have a monitoring plan and records must be maintained per Section 63.1350(p)(5).

[40 CFR Part 63.1350(p)]

- B43. Testing to determine applicability for 40 CFR 63 LLL may include Method 320 or 321 of Appendix A of Part 63 for HCl and Method 18 of Appendix A to 40 CFR Part 60 for organic HAP.

[40 CFR Part 63.1352]

- B44. The notification provisions of 40 CFR Part 63, Subpart A that apply and those that do not apply to owners and operators of affected sources subject to are listed in Table 1 of Subpart LLL.

Lehigh shall comply with the notification requirements in §63.9 as follows:

- a. Initial notifications as required by §63.9(b) through (d). For the purposes of this Subpart, a Title V or 40 CFR Part 70 permit application may be used in lieu of the initial notification required under §63.9(b), provided the same information is contained in the permit application as required by §63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under 40 CFR Part 70 and has received delegation of authority from the EPA. Permit applications shall be submitted by the same due dates as those specified for the initial notification
- b. Notification of performance tests, as required by §63.7 and §63.9(e).
- c. Notification of opacity and visible emission observations required by §63.1349 in accordance with §63.6(h)(5) and §63.9(f).
- d. Notification, as required by §63.9(g), of the date that the continuous emission monitor performance evaluation required by §63.8(e) is scheduled to begin.
- e. Notification of compliance status, as required by §63.9(h).

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- f. Within 48 hours of an exceedance that triggers retesting to establish compliance and new operating limits, notify the appropriate permitting agency of the planned performance tests. The notification requirements of §63.7(b) and §63.9(e) do not apply to retesting required for exceedances under this Subpart.

[40 CFR Part 63.1353]

B45. Lehigh shall comply with the reporting requirements specified in §63.10 of the general provisions of this Part 63, Subpart A as follows:

- a. As required by §63.10(d)(2), the owner or operator shall report the results of performance tests as part of the notification of compliance status.
- b. As required by §63.10(d)(3), the owner or operator of an affected source shall report the opacity results from tests required by §63.1349.
- c. As required by §63.10(d)(4), the owner or operator of an affected source who is required to submit progress reports as a condition of receiving an extension of compliance under §63.6(i) shall submit such reports by the dates specified in the written extension of compliance.

(d)-(e) [Reserved]

- f. As required by §63.10(e)(2), the owner or operator shall submit a written report of the results of the performance evaluation for the continuous monitoring system required by §63.8(e). The owner or operator shall submit the report simultaneously with the results of the performance test.
- g. As required by §63.10(e)(2), the owner or operator of an affected source using a continuous opacity monitoring system to determine opacity compliance during any performance test required under §63.7 and described in §63.6(d)(6) shall report the results of the continuous opacity monitoring system performance evaluation conducted under §63.8(e).
- h. As required by §63.10(e)(3), the owner or operator of an affected source equipped with a continuous emission monitor shall submit an excess emissions and continuous monitoring system performance report for any event when the continuous monitoring system data indicate the source is not in compliance with the applicable emission limitation or operating parameter limit.
- i. The owner or operator shall submit a summary report semiannually of the reporting period to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI). (CEDRI can be accessed through the EPA's Central Data Exchange (CDX).) Lehigh must use the appropriate electronic report in CEDRI for this subpart. Instead of using the electronic report in CEDRI for this subpart,

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Lehigh may submit an alternate electronic file consistent with the extensible markup language (XML) schema listed on the CEDRI Web site, once the XML schema is available. If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, Lehigh must submit the report to the Administrator at the appropriate address listed in § 63.13. Lehigh must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. The excess emissions and summary reports must be submitted no later than 60 days after the end of the reporting period, regardless of the method in which the reports are submitted.

The report must contain the information specified in §63.10(e)(3)(vi). In addition, the summary report shall include:

- (1) All exceedances of maximum control device inlet gas temperature limits specified in §63.1346(a) and (b);
- (2) Notification of any failure to calibrate thermocouples and other temperature sensors as required under §63.1350(g)(1)(iii); and
- (3) Notification of any failure to maintain the activated carbon injection rate, and the activated carbon injection carrier gas flow rate or pressure drop, as applicable, as required under §63.1346(c)(2) to comply with a D/F emissions limitation; and
- (4) Notification of failure to conduct any combustion system component inspections conducted within the reporting period as required under §63.1347(a)(3); and
- (5) Any and all failures to comply with any provision of the operation and maintenance plan developed in accordance with §63.1347(a); and
- (6) For each PM CPMS, HCl, Hg, and THC CEMS, SO₂ CEMS or Hg sorbent trap monitoring system, within 60 days after the reporting periods, Lehigh must report all of the calculated 30-operating day rolling average values derived from the CPMS, CEMS, CMS, or Hg sorbent trap monitoring systems; and
- (7) In response to each violation of any emissions standard or established operating parameter limit, the date, duration, and description of each violation and the specific actions taken for each violation including inspections, corrective actions and repeat performance tests and the results of those actions.

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For PM performance test reports used to set a PM CPMS operating limit, the electronic submission of the test report must also include the make and model of the PM CPMS instrument, serial number of the instrument, analytical principle of the instrument (e.g. beta attenuation), span of the instruments primary analytical range, milliamp value equivalent to the instrument zero output, technique by which this zero value was determined, and the average milliamp signals corresponding to each PM compliance test run.

All reports required by 40 CFR 63 LLL not subject to the requirements in paragraphs (b)(9) introductory text and (viii) of § 63.1354 must be sent to the Administrator at the appropriate address listed in § 63.13. The Administrator or the delegated authority may request a report in any form suitable for the specific case (e.g., by commonly used electronic media such as Excel spreadsheet, on CD or hard copy). The Administrator retains the right to require submittal of reports subject to paragraph (b)(9) introductory text and (viii) of this section in paper format.

- j. If the total continuous monitoring system downtime for any CEM or any CMS for the reporting period is 10 percent or greater of the total operating time for the reporting period, the owner or operator shall submit an excess emissions and continuous monitoring system performance report along with the summary report.
- k. (i) You must submit the information specified in paragraphs (b)(11)(i)(A) and (B) of this section no later than 60 days following the initial performance test. All reports must be signed by a responsible official.
 - (A) The initial performance test data as recorded under §63.1349(a).
 - (B) The values for the site-specific operating limits or parameters established pursuant to §63.1349(b)(1), (3), (6), (7), and (8), as applicable, and a description, including sample calculations, of how the operating parameters were established during the initial performance test.
 - (C) As of December 31, 2011, and within 60 days after the date of completing each performance evaluation or test, as defined in §63.2, conducted to demonstrate compliance with any standard covered by this subpart, you must submit the relative accuracy test audit data and performance test data, except opacity data, to the EPA by successfully submitting the data electronically via CEDRI and by using the Electronic Reporting Tool (ERT) (see <https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>). For any performance evaluations with no corresponding RATA pollutants listed on the ERT website, you must submit the results of the performance evaluation to the Administrator at the appropriate address listed in §63.13.

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(ii) For PM performance test reports used to set a PM CPMS operating limit, the electronic submission of the test report must also include the make and model of the PM CPMS instrument, serial number of the instrument, analytical principle of the instrument (*e.g.* beta attenuation), span of the instruments primary analytical range, milliamp value equivalent to the instrument zero output, technique by which this zero value was determined, and the average milliamp signals corresponding to each PM compliance test run.

- l. All reports required by this subpart not subject to the requirements in paragraphs (b)(9) introductory text and (b)(11)(i) of this section must be sent to the Administrator at the appropriate address listed in §63.13. The Administrator or the delegated authority may request a report in any form suitable for the specific case (*e.g.*, by commonly used electronic media such as Excel spreadsheet, on CD or hard copy). The Administrator retains the right to require submittal of reports subject to paragraphs (b)(9) introductory text and (b)(11)(i) of this section in paper format.
- m. Reporting a failure to meet a standard due to a malfunction. For each failure to meet a standard or emissions limit caused by a malfunction at an affected source, Lehigh must report the failure in the semi-annual compliance report required by §63.1354(b)(9). The report must contain the date, time and duration, and the cause of each event (including unknown cause, if applicable), and a sum of the number of events in the reporting period. The report must list for each event the affected source or equipment, an estimate of the amount of each regulated pollutant emitted over the emission limit for which the source failed to meet a standard, and a description of the method used to estimate the emissions. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.1348(d), including action taken to correct a malfunction.

[40 CFR Part 63.1354]

- B46. The owner or operator shall maintain files of all information (including all reports and notifications) required by this section recorded in a form suitable and readily available for inspection and review as required by §63.10(b)(1). The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site. The files may be maintained on microfilm, on a computer, on floppy disks, on magnetic tape, or on microfiche.
- The owner or operator shall maintain records for each affected source as required by §63.10(b)(2) and (b)(3) of this Part; and

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- a. All documentation supporting initial notifications and notifications of compliance status under §63.9; and
- b. All records of applicability determination, including supporting analyses; and
- c. If the owner or operator has been granted a waiver under §63.8(f)(6), any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements.

In addition to the recordkeeping requirements in paragraph (b) of this section, the owner or operator of an affected source equipped with a continuous monitoring system shall maintain all records required by §63.10(c).

The owner or operator must keep records of the daily clinker production rates, according to the clinker production monitoring requirements in Section 63.1350(d).

The owner or operator must keep records of the date, time and duration of each startup or shutdown period for any affected source that is subject to a standard during startup or shutdown that differs from the standard applicable at other times, and the quantity of feed and fuel used during the startup or shutdown period.

The owner or operator must keep records of the date, time and duration of each malfunction that causes an affected source to fail to meet an applicable standard; if there was also a monitoring malfunction, the date, time and duration of the monitoring malfunction; the record must list the affected source or equipment, an estimate of the volume of each regulated pollutant emitted over the standard for which the source failed to meet a standard, and a description of the method used to estimate the emissions.

The owner or operator must keep records of actions taken during periods of malfunction to minimize emissions in accordance with §63.1348(d) including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

For each exceedance from an emissions standard or established operating parameter limit, the owner or operator must keep records of the date, duration and description of each exceedance and the specific actions taken for each exceedance including inspections, corrective actions and repeat performance tests and the results of those actions.

[40 CFR Part 63.1355]

- B47. Subpart LLL of 40 CFR Part 63 can be implemented and enforced by the U.S.EPA, or a delegated authority such as the applicable State, local, or Tribal agency. If the U.S. EPA Administrator has delegated authority to a State, local, or Tribal agency, then that agency, in addition to the U.S. EPA, has the authority to implement and enforce this Subpart.

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The Shasta County Air Quality Management District is delegated to implement and enforce this Subpart.

In delegating implementation and enforcement authority of this Subpart to a State, local, or Tribal agency under Subpart E of this Part, the authorities contained in paragraph (c) of this section are retained by the Administrator of the U.S. EPA and cannot be transferred to the State, local, or Tribal agency.

The authorities that cannot be delegated to State, local, or Tribal agencies are as specified in paragraphs a. through d. below:

- a. Approval of alternatives to the requirements in §63.1340, §63.1342 through §63.1348, and §63.1351.
- b. Approval of major alternatives to test methods under §63.7(e)(2)(ii) and (f), as defined in §63.90, and as required in this Subpart.
- c. Approval of major alternatives to monitoring under §63.8(f), as defined in §63.90, and as required in this Subpart.
- d. Approval of major alternatives to recordkeeping and reporting under §63.10(f), as defined in §63.90, and as required in this Subpart.

[40 CFR Part 63.1358]

- B48. Pressure gauges shall be installed on each compartment of the Pre-blending System Dust Collectors.

[Condition VII.c.1., #NSR 4-4-4 SAC 78-01a]

- B49. During each quarter of source operations, the ongoing accuracy of the system of measuring hourly clinker production rates or feed rates must be determined, recorded and maintained. Quarterly feed rate accuracy must be maintained with +/- 5%.

[40 CFR Part 60.63(b)(2)]

- B50. Within 60 days after the date of completing each performance test (see §60.8) as required by this Subpart Lehigh must submit the results of the performance tests conducted to demonstrate compliance under this Subpart to the EPA's WebFIRE database by using the CEDRI that is accessed through the EPA's CDX. Performance test data must be submitted in the file format generated through use of the EPA's Electronic Reporting Tool (ERT). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be

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CBI on a compact disk, flash drive or other commonly used electronic storage media to the EPR. The electronic media must be clearly marked as CBI and mailed to:

U.S. EPA/OAPQS/CORE CBI Office
Attention: WebFIRE Administrator
MD C404-02
4930 Old Page Road
Durham, NC 27703

The same ERT file with the CBI omitted must be submitted to the EPA via CDX as described earlier in this paragraph. At the discretion of the delegated authority, Lehigh must also submit these reports, including the CBI, to the delegated authority in the format specified by the delegated authority. For any performance test conducted using test methods that are not listed on the ERT Web site, Lehigh must submit the results of the performance test to the Administrator at the appropriate address listed in §63.13.

[40 CFR Part 60.64(d)]

- B51. Within 60 days after the date of completing each CEMS performance evaluation test as defined in §63.2, Lehigh must submit relative accuracy test audit (RATA) data to the EPA's CDX by using CEDRI in accordance with paragraph (d)(1) of this section. Only RATA pollutants that can be documented with the ERT (as listed on the ERT Web site) are subject to this requirement. For any performance evaluations with no corresponding RATA pollutants listed on the ERT Web site, Lehigh must submit the results of the performance evaluation to the Administrator at the appropriate address listed in §63.13.

[40 CFR Part 60.64(d)]

- B52. For PM performance test reports used to set a PM CPMS operating limit, the electronic submission of the test report must also include the make and model of the PM CPMS instrument, serial number of the instrument, analytical principle of the instrument (e.g. beta attenuation), span of the instruments primary analytical range, milliamp value equivalent to the instrument zero output, technique by which this zero value was determined, and the average milliamp signals corresponding to each PM compliance test run.

[40 CFR Part 60.64(d)]

- B53. All reports required by 40 CFR 60 and 63 not subject to the requirements of these sections must be sent to the Administrator at the appropriate address listed in §63.13. The Administrator or the delegated authority may request a report in any form suitable for the specific case (e.g. by commonly used electronic media such as Excel spreadsheet, on CD or hard copy). The Administrator retains the right to require submittal of reports subject to electronic submission of this section in paper format.

[40 CFR Part 60.64(d)]

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B54. The permittee shall perform all the monitoring, recordkeeping, and other required functions delineated in the current version of the Lehigh Compliance Assurance Monitoring Plan (CAM Plan) on file with the District. The updated CAM Plan is included as Appendix 1 of this permit.

- a. Control device baghouse subject to this requirement is G-465 Indirect Coal Firing System Dust Collector. The CAM Plan requires daily (during operation) monitoring of manometer reading of Pressure Drop. Pressure Drop indicator range of 3-8 inches of water is consistent with valid operation. An excursion of this range of Pressure Drop triggers a Method 22 visible emission evaluation and corrective action as specified in Section III of the Rationale for Selection of Indicator Ranges in the updated CAM Plan. Periodic visible emission evaluations are to occur at the frequency specified in condition A7. The Pressure Drop indication manometer is to be maintained in working order and as per the manufacturer's specifications.
- b. Pressure Drop readings shall be recorded daily and include the following information:
 - (1) Date, place, and time
 - (2) Results
 - (3) Operating status

Records of Pressure Drop readings shall be retained on-site for a period of at least five (5) years from the date of monitoring.

- c. All deviations from Pressure Drop indicator ranges must be reported in the sixth (6) month Title V reports. Prompt reporting of deviation from CAM Plan requirements including those attributable to upset conditions as defined in the permit, the probable cause of such deviation, and any corrective actions or preventative measure taken. Prompt reporting is within four (4) hours as defined in condition F5.

[40 CFR Part 64.6(c)(3)]

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FINISH GRINDING DEPARTMENT

EQUIPMENT UNDER PERMIT

- A Mill Dust Collector (EA87)
- A Mill Separator Dust Collector (EA92/93)
- B Mill Dust Collector (EB147/148)
- B Mill Separator Dust Collector (EB142)
- A and B Mill High Efficiency Dust Collectors (EA87, EA92, EA93, and EB147)
- C Mill Separator Dust Collector (E34/35)
- C Mill Dust Collector (E30)
- C Mill Feed Elevator (E8) with Dust Collector (E12)
- C Mill Gypsum Weigh Feeder Dust Collector (E230)
- C Mill Clinker Weigh Feeder Dust Collector (E231)
- Gypsum Unloading Elevator Dust Collector (D34)
- Dust Shuttling System Day Tank Dust Collectors: D122, D124)

EMISSION LIMITS AND STANDARDS

- C1. The PM emissions from any dust collector permitted under the Finish Grinding Department shall not exceed 0.10 grains per dry standard cubic foot except for dust collector E12, E230, E231, D122, and D124 which shall not exceed 0.05 grains per dry standard cubic foot and dust collectors EA92, EA93, EA97, and EB142 which shall not exceed 0.005 grains per dry standard cubic foot.

[District Permit 85-PO-12f, Condition 15]; [District Rule 3:2]

- C2. The owner/operator shall demonstrate compliance with all provisions of the NESHAP for the Portland Cement Manufacturing Industry (40 CFR, Part 63, Subpart LLL). The following emission and operating limits apply:

AFFECTED SOURCE	POLLUTANT	EMISSION AND OPERATING LIMIT
ALL AFFECTED MATERIAL HANDLING PROCESSES ^a	OPACITY	10 PERCENT
ALL FINISH MILLS	OPACITY	10 PERCENT

^a Includes finish mill system, clinker storage, finished product storage, conveyor transfer points, and bulk loading and unloading systems.

[District Permit 85-PO-12f, Condition 17]; [40 CFR Part 63.1343, 40 CFR Part 63.1345]

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C3. All dust collectors and duct work are to be maintained so as to assure that PM emissions shall not exceed the maximum allowed under District Rule 3:2.

[District Permit 85-PO-12f, Condition 13]

C4. The doors on all buildings shall be kept closed except during actual usage.

[District Permit 85-PO-12f, Condition 14]

MONITORING REQUIREMENTS

C5. The owner/operator shall comply with all applicable provisions of the NESHAP for the Portland Cement Manufacturing Industry (40 CFR, Part 63, Subpart LLL). The following monitoring requirements apply:

AFFECTED SOURCE/POLLUTANT OR OPACITY	MONITOR TYPE/OPERATION/PROCESS	MONITORING REQUIREMENTS
ALL AFFECTED SOURCES	OPERATIONS AND MAINTENANCE PLAN	PREPARE WRITTEN PLAN FOR ALL AFFECTED SOURCES AND CONTROL DEVICES
ALL AFFECTED MATERIAL HANDLING PROCESSES ^{a,d}	EPA Method 9 ^b EPA Method 22 ^b	MONTHLY AS SPECIFIED IN PLAN
ALL FINISH MILLS	EPA Method 9 ^c EPA Method 22 ^c	DAILY AS SPECIFIED IN PLAN

^a Includes finish mill system, clinker storage, finished product storage, conveyor transfer points, and bulk loading and unloading systems.

^b 10-minute EPA Method 22 visible emission test required initially and monthly thereafter. If visible emissions are observed, must conduct 30 minutes of opacity observations, recorded at 15-second intervals in accordance with EPA Method #9, and must begin within one hour. The frequency of monthly EPA Method #22 readings may be reduced to semi-annual if no visible emissions are observed for 6 consecutive monthly tests.[see 40 CFR 63.1350(f)(1) for other procedures and allowances] Opacity readings must be reported to the District with the semi-annual report required by condition F.7.

^c Daily 6-minute Method #22 or alternate continuous opacity monitors (COMs) or bag leak detection system (BLDS) as specified in the written operations and maintenance plan. For daily Method #22 observations, if visible emissions are observed, initiate corrective actions specified in O&M plan within 1 hour. Conduct a follow up Method 22 within 24 hours of the previous Method 22 in which visible emissions were observed. If visible emissions are observed during the follow up Method 22, conduct an opacity test in accordance with Method 9. The duration of the Method 9 test must be 30 minutes. If a COM or BLDS is used, opacity must be maintained so that the 6-minute average opacity for any 6-minute block period does not exceed 10 percent.

^d Method 22 visible emissions monitoring requirements do not apply to totally enclosed conveying system transfer points. Totally enclosed conveying system transfer point shall mean a conveying system transfer point that is enclosed on all sides, top, and bottom. Method 22 testing on partially enclosed or unenclosed conveying system transfer points may be

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conducted on the building containing the affected source. If visible emissions from a building are monitored, the requirements of 40 CFR 63.1350 (a)(4)(i) through (iv) apply, and visible emissions from each side, roof and vent of the building must be tested for at least 10 minutes. The test must be conducted under normal operating conditions.

[40 CFR Part 63.1348, 40 CFR Part 63.1349, 40 CFR Part 63.1350]; [40 CFR Part 63.1350(1) – Alternate Monitoring]; [40 CFR Part 63.1354]

STORAGE AND SHIPPING DEPARTMENT

EQUIPMENT UNDER PERMIT

- Silo #3/Silo #11/West Elevator Dust Collector (J159)
- General Dust Collector (J162)
- East Packer Dust Collector (J165)
- West Packer Dust Collector (J168)
- Truck Silos Dust Collector (J174)
- West Rail Silo Dust Collector (J321)
- East Rail Silo Dust Collector (J345)
- Rail Silos Dust Collector (J350)
- Truck Vacuum Dust Collector (J390)
- Rail Special Loading Dust Collector (J294)
- Truck Silo #4 Dust Collector (J387)

EMISSION LIMITS AND STANDARDS

- D1. The PM emissions from any dust collector permitted under the Storage and Shipping Department shall not exceed 0.10 grains per dry standard cubic foot except for dust collectors J321, J345, J390, J294, and J387 which shall not exceed 0.05 grains per dry standard cubic foot.

[District Permit 85-PO-15h, Condition 15]; [District Rule 3:2]

- D2. The owner/operator shall comply with all applicable provisions of the NESHAP for the Portland Cement Manufacturing Industry (40 CFR Part 63 Subpart LLL). The following emission and operating limits apply:

AFFECTED SOURCE	POLLUTANT	EMISSION AND OPERATING LIMIT
ALL AFFECTED MATERIAL HANDLING PROCESSES ^a	OPACITY	10 PERCENT

^a Includes finished product storage, conveyor transfer points, bagging, and bulk loading and unloading systems.

[District Permit 85-PO-15h, Condition 17]; [40 CDR Part 63.1343, 63.1348, 63.1354]

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OPERATING CONDITIONS

D3. All dust collectors and duct work are to be maintained so as to assure that PM emissions shall not exceed the maximum allowed under District Rule 3:2.

[District Permit 85-PO-15h, Condition 13]

D4. The doors on all buildings shall be kept closed except during actual usage.

[District Permit 85-PO-15h, Condition 14]

D5. Pressure gauges shall be installed on each compartment of the Bulk Rail West Dust Collector (J321), Bulk Rail East Dust Collector (J345), Bulk Rail Dust Tanks Dust Collector (J350), and the Special Cement Dust Collector (J294).

[Condition VII.c.1.a., #NSR 4-4-4 SAC 78-01a]

D6. Dust Collectors J294, J321, J345, and J350 serving the rail car load-out system shall have an air-to-cloth ratio which does not exceed 8.0 cfm/ft².

[Condition VII.c.1.c., #NSR 4-4-4 SAC 78-01a]

MONITORING REQUIREMENTS

D7. Lehigh shall demonstrate compliance with all provisions of the NESHAP for the Portland Cement Manufacturing Industry (40 CFR Part 63 Subpart LLL). This includes demonstrating compliance with the following monitoring requirements:

AFFECTED SOURCE/POLLUTANT OPACITY	OR	MONITOR TYPE/OPERATION/PROCESS	MONITORING REQUIREMENTS
ALL AFFECTED SOURCES		OPERATIONS AND MAINTENANCE PLAN	PREPARE WRITTEN PLAN FOR ALL AFFECTED SOURCES AND CONTROL DEVICES
ALL AFFECTED MATERIAL HANDLING PROCESSES ^a		EPA Method 9 ^b EPA Method 22 ^{b,c}	MONTHLY AS SPECIFIED IN PLAN

^a Includes finished product storage, conveyor transfer points, bagging, and bulk loading and unloading systems.

^b 10-minute EPA Method 22 visible emission test required initially and monthly thereafter. If visible emissions are observed, 30 minutes of opacity observations, recorded at 15-second intervals in accordance with Method #9, must begin within one hour. The frequency of monthly Method #22 readings may be reduced to semi-annual if no visible emissions are observed for 6 consecutive monthly tests.[see 40 CFR 63.1350(f)(1) for other procedures and allowances] Opacity readings must be reported to the District with the semi-annual report required by condition F.7.

^c Method 22 visible emissions monitoring requirements do not apply to totally enclosed conveying system transfer points.

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Method 22 testing on partially enclosed or unenclosed conveying system transfer points may be conducted on the building containing the affected source.

[40 CFR Part 63.1348, 40 CFR Part 63.1350 and 40 CFR Part 63.1354]

EMERGENCY STANDBY INTERNAL COMBUSTION ENGINES

EQUIPMENT UNDER PERMIT

Detroit Model V-71 489 Brake Horsepower Diesel Engine (R100A)

Multi-Component System of Five (5)

Caterpillar Model ZW3516-CAT, 2132 Brake Horsepower (Each) Diesel Engines
(M151, M152, M153, M154, M155) with Miratech Combikat Diesel Particulate Filters

OPERATING CONDITIONS

- E1. The operation of the Detroit Model V-71 engine shall be limited to a total of 3500 hours in any calendar year. The operation of each Caterpillar Model ZW3516-CAT engine shall be limited to a total of 300 hours in any calendar year. Testing and maintenance of the Detroit Model V-71 engine shall be limited to no more than 21 hours per year. Testing and maintenance of the five Caterpillar Model ZW3516 engines shall be limited to no more than 31 hours per year each.

[District Permit 99-PO-35a, Condition 13]; [District Permit 99-PO-36a, Condition 13]

- E2. The Detroit Model V-71 Diesel engine will be required to meet the applicable emissions limitations and operating limitations contained in the National Emissions Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines, Subpart ZZZZ and is required to operate according to the operating and maintenance procedures contained in the Operation and Maintenance Plan on file with the District. Change oil and filter every 500 hours or implement an oil analysis program to extend oil changes. Change the air filter every 1,000 hours.

[Table 2c to Subpart ZZZZ of 40 CFR Part 63]

- E3. Lehigh must operate the emergency stationary Detroit Model V-71 489 HP RICE according to the requirements in paragraphs a. through d. of this condition. In order for the engine to be considered an emergency stationary RICE under Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in paragraphs a. through d. of this condition, is prohibited. If Lehigh does not operate the engine according to the requirements in paragraphs a. through d. of this condition, the engine will not be considered an emergency engine under Subpart ZZZZ and must meet all requirements for non-emergency engines.

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- a. There is no time limit on the use of emergency stationary RICE in emergency situations.
- b. Lehigh may operate its emergency stationary RICE for any combination of the purposes specified in paragraph (b)(1) of this Condition for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (c) counts as part of the 100 hours per calendar year.
 - (1) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- c. Emergency stationary RICE located at major sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situation. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

TESTING, MONITORING AND REPORTING REQUIREMENTS

- E4. The operator of any stationary internal combustion engine claiming an exemption from District Rule 3:28 (Stationary Internal Combustion Engines), shall maintain an engine operating log that includes the total recorded hours of operation. This information shall be maintained for five years and shall be submitted to the APCO upon request.
- E5. The Detroit Model V-71 Diesel engine subject to Part 63 shall be reported as such to the EPA Administrator via initial notification as per 40 CFR Part 63.

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FACILITY-WIDE REQUIREMENTS

EMISSION LIMITS AND STANDARDS

- F1. No person shall discharge contaminants from any single source into the atmosphere in amounts greater than those designated below (unless governed by EPA New Source Performance Standard or National Emission Standards for Hazardous Air Pollutants). All emissions are to be measured by methods approved for use by the APCO. Any method approved by the EPA and/or CARB is approved for use by the APCO:
- a. **Combustion Particulate Matter**^{1,2}0.15 gr/dscf
 - b. **Particulate Matter Less Than or Equal to 10 μ in Size**^{1,2}0.10 gr/dscf
 except for dust collectors C34, D122, D123, E12, E230, E231, G418-1, J321, J345, J390, and J294 which shall not exceed 0.05 grains per dry standard cubic foot.
 - c. **All Other Particulate Matter**^{1,2}0.15 gr/dscf
 - d. **Maximum Hourly Particulate Matter (E) as a Function of Process Weight (P_t) in Tons Per Hour**
 Where E = lbs/hr
 Less Than or Equal to 30 Tons/HourE = 4.1 P_t^{.67}
 Greater Than 30 Tons/HourE = 55 P_t^{.11} - 40
 - e. **Oxides of Sulfur (as SO₂)**^{1,2,3}300 ppm
 - f. **Oxides of Nitrogen (as NO₂)**^{1,2,3}250 ppm
 - g. **Opacity**⁴
 Ringelmann #2 and/or 40% equivalent opacity pursuant to *California Health & Safety Code* Section 41701

Footnotes:

¹Calculated at standard conditions: 70° F, one atmosphere, dry gas basis.

²When the emissions are generated by a combustion process, the gas volume shall be corrected to 12% CO₂ at standard temperature and pressure.

³The Air Pollution Control Officer may specify an appropriate correction and/or reporting factor depending upon the type of process involved

⁴This requirement does not apply to smoke emissions from burners used to produce energy and fired by forestry and agricultural residues with supplementary fuels when the emission result from startup or shutdown of the combustion process or from the malfunction of emission control equipment. However, this exemption does not apply to emissions which exceed a period or periods of time aggregating more than 30 minutes in any 24-hour period, or which result from the failure to operate and maintain in good working order any emission control equipment.

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[SCAQMD Rule 3:2, Specific Air Contaminants, 54 FR 14650, 4/12/89]

- F2. A person shall not discharge more than forty (40) pounds of photochemically reactive solvents into the atmosphere in any one day from any article, machine, equipment, or other contrivance used for employing, applying, evaporating, or drying any photochemically reactive solvent, as defined in District Rule 1:2, or material containing such solvent, unless all photochemically reactive solvents discharged from such article, machine, equipment, or other contrivance have been reduced either by at least 85 percent overall **or** to not more than 40 pounds in any one day. The provisions of this condition shall not apply to:
- a. The spraying or other employment of insecticides, pesticides, or herbicides.
 - b. The employment, application, evaporation, or drying of saturated halogenated hydrocarbons or perchloroethylene.
 - c. The employment or application of polyester resins or acetone used in a fiberglass reinforced plastics operation.

Whenever any organic solvent or any constituent of an organic solvent may be classified from its chemical structure into more than one of the above groups of organic compounds, it shall be considered as a member of the most reactive chemical groups, i.e., the groups having the least allowable percent of the total of solvents.

No person shall discharge from any device, contrivance, or machine more than 40 pounds per day of any photochemically reactive substance other than those described above unless such discharge is controlled to reduce emissions by 85 percent.

[SCAQMD Rule 3:4, Industrial Use of Organic Solvents, 49 FR 47491, 10/3/84]

- F3. The opacity of any stack discharge not subject to a specific opacity standard in this permit shall not exceed a Ringelmann #2 or 40 percent equivalent opacity for any period greater than three (3) minutes in any period of sixty (60) consecutive minutes.

[SCAQMD Rule 3:2, Specific Air Contaminants, 54 FR 14650, 4/12/89]

OPERATING CONDITIONS

- F4. The owner and operator of the facility shall construct and operate the stationary source in compliance with all other applicable provisions of 40 CFR Parts 52, 60 (including, but not limited to Subpart F), 61 and 63 and all other applicable Federal, State, or local regulations.

[Condition VI., #NSR 4-4-4 SAC 78-01a]

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- F5. Emissions exceeding any of the limits established in this permit shall be immediately reported to the APCO:
- a. For facility-wide scheduled maintenance, notice shall be provided to the APCO at least twenty-four (24) hours prior to shutdown, whether or not an emission exceedance is expected.
 - b. The emission source operator shall notify the APCO within four (4) hours of the occurrence of any excess emission and provide information on the time, duration, cause, and extent of the excess emission. Upon the request of the APCO, a full, written report of each occurrence, including a statement of all known causes and the nature of the actions to be taken pursuant to the requirements of Rule 3:10 or Rule 5 shall be submitted to the District.
 - c. Corrective action shall be taken immediately by the operator of the emission source to correct the conditions causing excessive emissions to reduce the frequency of the occurrence of such conditions. In no event shall equipment be operated in a manner that creates excessive emissions beyond the end of the work shift or twenty-four (24) hours, whichever occurs first.
 - d. An emergency constitutes an affirmative defense to any action brought for non-compliance with technology-based emission limits if:
 - (1) The emission source operator can identify the cause(s) of the emergency.
 - (2) The permitted facility was at the time being properly operated.
 - (3) During the period of the emergency, the emission source operator took all reasonable steps to minimize levels of excess emission.
 - (4) The emission source operator submitted notice of the emergency to the APCO in accordance with this condition.

(For the purposes of this Condition, emergency shall be as defined in Title 40 of the *Code of Federal Regulations*, Part 70, Section 70.6(g); i.e. “any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency.”)

Within two (2) working days of the emergency event, the permittee shall provide the District with a description of the emergency and any mitigating or corrective actions taken. Within two (2) weeks of an emergency event, the responsible official

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shall submit to the District a properly signed contemporaneous log or other relevant evidence that contains all the information for what constitutes an emergency (as described above in d. 1-4 of this Condition).

In any enforcement proceeding, the permittee has the burden of proof for establishing that an emergency occurred.

- e. An excess emission occurrence may not avoid enforcement action by the APCO if the occurrence is caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- f. Nothing expressed in this condition shall be construed to limit enforcement authorities under the Federal Clean Air Act.
- g. Excess emissions of applicable requirements during startup and shutdown shall be considered an emission violation unless an applicable requirement provides otherwise. Excess emissions of permit conditions shall be considered a violation if the owner or operator cannot demonstrate that the excess emissions are unavoidable when requested to do so by the APCO. The APCO may specify for a particular source the amount, time, duration, and under what circumstances excess emissions are allowed during startup or shutdown if consistent with an applicable requirement. The owner or operator shall, to the extent practicable, operate the emission source and any associated air pollution control equipment or monitoring equipment in a manner consistent with best practicable air pollution control practices to minimize emissions during startup and shutdown.

[SCAQMD Rule 3:10, Excess Emissions, SCAQMD Rule 5]; [Condition II, #NSR 4-4-4 SAC 78-01a, 40 CFR Part 63.1354]

- F6. The permittee shall promptly report any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), to the APCO in accordance with District Rule 3:10 as listed in Condition F5. If the deviation is not defined in District Rule 3:10, reporting shall be no longer than 10 days after the deviation.

[SCAQMD Rule 5]

- F7. The permittee shall submit a written monitoring report to the APCO every six months. The report shall state whether compliance was continuous or intermittent during the period. The reporting periods shall be January 1 through June 30 and July 1 through December 31. These reports shall be submitted within forty-five (45) days of the end of each reporting period. When no deviations have occurred for the reporting period, such information shall be stated in the report. The monitoring report shall include at a minimum:

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- a. A report for each deviation from a permit requirement that occurred during the reporting period, including emergency events. All reports of a deviation from permit requirements shall include the probable cause of the deviation and any preventative or corrective action taken. The permittee shall use District approved forms, or equivalent approved by the District, to report each deviation from permit requirements.
- b. Results from any emission testing done during the reporting period if not provided earlier to the District immediately following the test.
- c. A Certification Report form (Forms 5-K1a, K1b, K2, and K3), which includes a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report and shall state that “based upon information and belief formed after reasonable inquiry, the statements and information in the documents are true, accurate, and complete.”

[SCAQMD Rule 5]

- F8. The permittee shall submit compliance certification reports to the U.S. EPA and the APCO every twelve (12) months. The report shall be submitted within forty-five (45) days of the end of the reporting period. The permittee shall use District approved forms, or equivalent approved by the District, for the compliance certification and shall also include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report.

Compliance certifications shall be sent to EPA at the following address:

U.S. EPA Region 9
Air Division (AIR-3)
75 Hawthorne Street
San Francisco, CA 94105-3901

[SCAQMD Rule 5]

- F9. The owner or operator shall provide written notification of any physical or operational change to an existing facility (as defined by 40 CFR 60.2) that may increase the emission rate of any air pollutant to which a standard under 40 CFR Part 60 applies, unless that change is specifically exempted under an applicable Subpart or in 40 CFR Part 60.14(e). This notice shall be post marked sixty (60) days or as soon as practical before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. Should Lehigh plan to undertake a change in operation, that may adversely affect compliance with an applicable standard, a performance test must be conducted as specified in §63.1349(b). Written notice must be provided to the Administrator at least 60 days prior to undertaking an operational change that may adversely affect compliance with an applicable standard.

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The performance test must be completed within 360 hours after the planned operational change period begins.

[40 CFR Part 60.7(a)4]; [40 CFR Part 63.1349(e)]; [40 CFR Part 60.1349(c)]

- F10. The permittee shall maintain a file of all reports, notifications, measurements, including continuous monitoring system, monitoring device, and performance testing measurements, all continuous monitoring system performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on these systems or devices; and all other information required by this part recorded in a permanent form suitable for inspection. The file shall be retained for at least five (5) years following the date of such measurements, maintenance, reports and records. At a minimum, the most recent two (2) years of data shall be retained on site. The remaining three (3) years of data may be retained off site.

[40 CFR Part 60.7(f); 40 CFR Part 63.10; District Rule 5; 40 CFR Part 63.10; 40 CFR Part 63.1355]

- F11. The permittee shall provide the APCO at least thirty (30) days prior notice of any performance test, except as specified under other Subparts, to afford the APCO the opportunity to have an observer present.

[40 CFR Part 60.8(d)]

- F12. The permittee shall provide or cause to be provided, testing facilities as follows:

- a. Sampling ports adequate for test methods applicable to such facility. This includes:

- (1) Constructing the air pollution control system such that volumetric flow rates and pollution emission rates can be accurately determined by applicable test methods and procedures and,
- (2) Provide stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures.

- b. Safe sampling platforms(s).
- c. Safe access to sampling platform(s).
- d. Utilities for sampling and testing equipment.

[District Rule 2:14; 40 CFR Part 60.8(e)]

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- F13. Emission opacity shall be determined by conducting observations in accordance with Reference Method 9 in Appendix A of 40 CFR Part 60, Reference Method 22 in Appendix A of 40 CFR Part 60, or from continuous monitoring systems as provided in 40 CFR Part 60.11(e), 40 CFR Part 63.8, or an applicable Subpart of 40 CFR Parts 60 or 63.

[40 CFR Part 60.11(b); 40 CFR Part 63.8; 40 CFR Part 63.1349; 40 CFR Part 63.1350]

- F14. The owner or operator shall comply with the monitoring, notification, reporting, and record keeping requirements of section 40 CFR Part 63 Subpart A and Subpart LLL, Sections 63.1350, 63.1353, 63.1354, and 63.1355 respectively. Notification shall be made to the Administrator and APCO at least sixty (60) calendar days before any performance test as required by Part 63 is scheduled to begin. The performance test notification shall also include the anticipated schedule for conducting opacity observations as required by this Part.

[40 CFR Part 63.9]

- F15. 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 (that also addresses startup and shutdown). The plan shall be submitted to the Administrator for review and approval as part of the application for a Part 70 permit. Additionally, a written startup/shutdown/malfunction plan is required for the source.

[40 CFR Part 63.1347]; [40 CFR Part 63.6(e)(3)]

- F16. The owner or operator of a kiln or in-line kiln/raw mill shall monitor opacity at each point where emissions are vented from these affected sources including alkali bypasses in accordance with paragraphs (c)(1) through (c)(3) of this section as per the MACT Standard.

[40 CFR Part 63.1350(c)]

- F17. Any open vegetation burning conducted at the facility must be done in accordance with a District issued permit and be in compliance with District Rules 2:6 and 2:7.

STANDARD CONDITIONS

- G1. The APCO reserves the right to amend this permit if the need arises in order to ensure compliance of this facility or to abate any public nuisance.

[District Permits 85-PO-12f; 85-PO-13i; 85-PO-14n; 85-PO-15h; Condition 6]

- G2. Acceptance of this permit is deemed acceptance of all conditions as specified. Failure to comply with any condition of this permit shall be grounds for revocation, either by the APCO or the AQMD Hearing Board.

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[District Permits 85-PO-12f; 85-PO-13i; 85-PO-14n; 85-PO-15h; Condition 5]

- G3. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility under 40 CFR Part 60, Subpart F including associated air pollution control equipment as efficiently as possible and in a manner consistent with good air pollution control practices for minimizing emissions.

At all times Lehigh must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR Part 60.11(d)]; [Condition I, #NSR 4-4-4 SAC 78-01a]; [40 CFR Part 63.1348(d)]

- G4. The APCO may place reasonable conditions upon any source as delineated below, that will mitigate the emissions from such sources to below a level of significance or to a point that such emissions no longer constitute a violation of Health & Safety Code Sections 41700 and/or 41701:

- a. Fugitive Sources
- b. Indirect Sources
- c. Non-traditional Sources

[SCAQMD Rule 3:16]

- G5. No person shall build, erect, install, or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission that would otherwise constitute a violation.

[SCAQMD Rule 3:6, Circumvention, 42 FR 42223, 8/22/77, 40 CFR Part 60.12]

- G6. The permittee shall comply with all permit conditions of this Title V operating permit.

[SCAQMD Rule 5]

- G7. This permit does not convey property rights or exclusive privilege of any sort.

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[SCAQMD Rule 5]

- G8. The non-compliance with any permit condition herein is grounds for Title V Operating Permit and District Permit to Operate termination, revocation, modification, enforcement action, or denial of permit renewal.

[SCAQMD Rule 5]

- G9. This permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by the District.

[SCAQMD Rule 5]

- G10. It shall not be a defense for the 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.

[SCAQMD Rule 5]

- G11. A pending permit action or notification of anticipated non-compliance does not stay any permit condition.

[SCAQMD Rule 5]

- G12. Within a reasonable time period, the permittee shall furnish any information requested by the APCO, in writing, for the purpose of determining: 1) compliance with the permit, and 2) whether cause exists for a permit or enforcement action.

[SCAQMD Rule 5]

- G13. The Regional Administrator of the U.S. EPA, the Executive Officer of CARB, the APCO, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises:

- a. To inspect the stationary source, including equipment, work practices, operations, and emission-related activity; and
- b. To inspect and duplicate records required by this Permit to Operate; and
- c. To sample substances or monitor emissions from the source or other parameters to assure compliance with the permit or applicable requirements. Monitoring of emissions can include source testing.

[SCAQMD Rule 5]; [Condition III, #NSR 4-4-4 SAC 78-01a]

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- G14. The provisions of this Title V Operating Permit are severable, and, if any provision of this Permit is held invalid, the remainder of this Permit shall not be affected thereby.

[SCAQMD Rule 5]; [Condition III, #NSR 4-4-4 SAC 78-01a]

- G15. This Operating Permit shall become invalid five (5) years from the date of issuance. The owner or operator shall apply for renewal of this permit no earlier than eighteen (18) months and no later than six (6) months before the date of expiration. Upon submittal of a timely and complete renewal application, this Operating Permit shall remain in effect until the APCO issues or denies the renewal application.

[SCAQMD Rule 5]

- G16. Equipment is to be maintained so that it operates as it did when the permit was issued.

[District Permits 85-PO-12e; 85-PO-13e; 85-PO-14h; 85-PO-15e; Condition 3]

- G17. The permittee shall remit the Title V supplemental annual fee to the District on a timely basis. Failure to remit fees on a timely basis is grounds for forfeiture of this Operating Permit and the District Permit to Operate. Operation without a Permit to Operate subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to section 502(a) of the Clean Air Act.

[SCAQMD Rule 5]

- G18. Any person who is building, erecting, altering, or replacing any article, machine, equipment or other contrivance, or multi-component system including same, portable or stationary, and who is not exempt under Section 42310 of the *California Health and Safety Code*, the use of which may cause the issuance of air contaminants, shall first obtain written authority for such construction from the APCO.

[SCAQMD Rule 2:1A, Permits Required, 54 FR 26381, 6/18/82]

- G19. Before any article, machine, equipment or other contrivance, or multi-component system including same, portable or stationary, not exempt under Section 42310 of the *California Health and Safety Code*, the use of which may cause the issuance of air contaminants, may be operated or used, a written permit shall be obtained from the APCO.

[SCAQMD Rule 2:1A]

- G20. Where an application for or issuance of a permit is pending or in the event of an emergency occurring as a result of an excusable malfunction of a device under permit, the APCO may authorize the operation of the article, machine, equipment, device, or other contrivance or multi-component system for which a permit is sought for periods of

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time not to exceed sixty (60) days each for the purpose of testing, experimentation, or obtaining necessary data for a permit or correcting a malfunction. No fee or application will be required for such authorization.

[SCAQMD Rule 2:1A]

- G21. No person shall willfully deface, alter, forge, counterfeit, or falsify a Permit to Operate, any article, machine, equipment, or other contrivance.

[SCAQMD Rule 2:21, Defacing Permit, 37 FR 19812, 9/22/72 (current Rule 2:24)]

- G22. A person who has been granted a Permit to Operate as described in Rule 2:1A.b. shall firmly affix such permit, an approved facsimile, or other approved identification bearing the permit number upon the article, machine, equipment or other contrivance in such a manner as to be clearly visible and accessible. In the event that the article, machine, equipment or other contrivance is so constructed or operated that the Permit to Operate cannot be so placed, the Permit to Operate shall be mounted so as to be clearly visible in an accessible place within 25 feet of the article, machine, equipment, or other contrivance, or maintained readily available at all times on the operating premises.

[SCAQMD Rule 2:23, Posting of Permit to Operate, 54 FR 14650, 9/22/72]

- G23. This permit is not transferable from either one location to another, or from one person to another, except on the written approval of the APCO. In the event of any changes in control or ownership of the facilities, this permit and any Approval to Construct/Modify shall be binding on all subsequent owners and operators. The applicant shall notify the succeeding owner and operator of the existence of this permit and any Approval to Construct/Modify and its conditions by letter, a copy of which shall be forwarded to the APCO, the CARB, and EPA Region IX.

[SCAQMD Rule 2:21, Transfer of Permit]; [Condition IV, #NSR 4-4-4 SAC 78-01a]

- G24. All information, analyses, plans, or specifications that disclose the nature, extent, quantity, or degree of air contaminants or other pollution that any article, machine, equipment, or other contrivance will produce and that any air pollution control district or any other state or local agency or District requires any applicant to provide before such applicant builds, erects, alters, replaces, operates, sells, rents, or uses such article, machine, equipment, or other contrivance, are public records.

[SCAQMD Rule 2:25, Public Records – Trade Secrets, 42 FR 42223, 8/22/77]

- G25. All air or other pollution monitoring data, including data compiled from stationary sources, are public records.

[SCAQMD Rule 2:25, Public Records – Trade Secrets, 42 FR 42223, 8/22/77]

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- G26. Except as otherwise provided in Condition #G27 (below), trade secrets are not public records under this Condition. As used in this Condition, “trade secrets” may include (but are not limited to) any formula, plan, pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information that:
- a. Is not patented; and
 - b. Is known only to certain individuals within a commercial concern who are using it to fabricate, produce, or compound an article of trade or a service having commercial value; and
 - c. Gives its user an opportunity to obtain a business advantage over competitors who do not know or use it.

[SCAQMD Rule 2:25, Public Records – Trade Secrets, 42 FR 42223, 8/22/77]

- G27. Notwithstanding any other provision of law, all air pollution emission data, including those emission data that constitute trade secrets as defined in subdivision c, are public records. Data used to calculate emission data are not emission data for the purposes of this subdivision, and data that constitute trade secrets and that are used to calculate emission data are not public records.

[SCAQMD Rule 2:25, Public Records – Trade Secrets, 42 FR 42223, 8/22/77]

- G28. Pursuant to District Rule 2:16, the APCO may revoke an existing Authority to Construct and/or Permit to Operate if the applicant and/or permittee violates the conditions of such permit as specified by the APCO. The APCO may reinstate the permit at such time as the applicant and/or permittee shows that the condition(s) previously violated are now being attained. Such showing shall not bar the APCO from pursuing any legal remedy with respect to any violation that resulted from the failure to meet any permit condition as specified by the APCO.

[SCAQMD Rule 2:26, Revocation of Permit, 54 FR 14650, 4/12/89]

- G29. Each and every applicable provision of Federal or State law or applicable Air Basin Plan now or hereinafter enacted or as amended that regulates the discharge of any air contaminants is incorporated here by reference. Where such provisions conflict with local rules and regulations, the more restrictive provisions shall apply.

[SCAQMD Rule 3:1, Applicability of State Laws, 42 FR 42223, 8/22/77]

- G30. Persons performing maintenance, service, repair or disposal of appliances using CFC’s, HCFC’s, or other ozone-depleting substances must be certified by an approved technician certification program.

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[40 CFR Part 82.161, Stratospheric Ozone Protection]

- G31. Persons opening appliances using CFC's, HCFC's or other ozone-depleting substances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR Part 82.156.

[40 CFR Part 82.156, Stratospheric Ozone Protection]

- G32. Equipment used during the maintenance, service, repair, or disposal of appliances using CFC's, HCFC's or ozone-depleting substances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR Part 82.158.

[40 CFR Part 82.158, Stratospheric Ozone Protection]

- G33. The permittee shall obtain the approval of the APCO prior to using a halogenated solvent in the cold cleaning solvent de-greaser.

[40 CFR Part 63, Subpart T, MACT Standards for Halogenated Solvent Cleaning Operations]

- G34. The operating staff of this facility shall be advised of and familiar with all the conditions of this permit.

[District Permits 85-PO-12f; 85-PO-13i; 85-PO-14n; 85-PO-15h; Condition 12]

- G35. Any anticipated change to equipment subject to applicable rules and regulations shall be reported to the District prior to installation in order for the District to determine if an application for an Authority to Construct is necessary.

[SCAQMD Rule 2:1A]

- G36. Correspondence shall be forwarded to each of the following agencies if required by the specific Approval to Construct condition:

- a. Air Pollution Control Officer
Shasta County Air Quality Management District
1855 Placer Street, Suite 101
Redding, CA 96001-1759
- b. Chief, New Source Section (Attn: A-5-1)
U.S. Environmental Protection Agency Region IX
75 Hawthorne Street
San Francisco, CA 94105

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- c. Stationary Source Control Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95814

[Condition VIII, #NSR 4-4-4 SAC 78-01a]

INSIGNIFICANT EMISSIONS SOURCES

[The following emission devices are determined to be insignificant sources per District Rule 5 Attachment 1.]

Quarries and Crushing Department

R115 Dust Collectors
C164 Belt Dust Collector (C160)
Bypass Dust Collector (C162)
Motor Oil Storage Tanks
Hydraulic Oil Storage Tanks
Diesel Storage Tanks
Quarries and Crushing Department Mobile Equipment
Outdoor Storage Piles
Quarry Drills (except R-116)

Raw Milling and Kiln Department

Coal/Coke Offloading System
Whole Tire Feed System
Agricultural Fuels Offloading System
Clinker Emergency Discharge System
Clinker Handling Dust Collectors (D87, D88, D89)
Laboratory Equipment

Finish Grinding Department

E46 FK Pump Feed Hopper Bin Vent (E48)
B Mill to C Mill Separator Airslide/Blower System
Ball Sorter
Gypsum Rail Car Unloading System
Air Entraining Reagent Storage Tank
Grinding Aid Storage Tanks
Mill Building Ventilating Fans

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Storage and Shipping Department

Spring Conveyors for Sacked Cement (J130, J131)
Building Ventilating Fans

Facility Wide Operations

Maintenance/Garage Building Ventilating Fan (K4)
Welding Ventilating Fan (K7)
Oil House Ventilating Fan (K9)
Solvent Degreasing Tanks
Painting Operations
Maintenance Welding Operations
Air Conditioners
Gasoline Storage Tank, 1000 gal (K42)
Gasoline Storage Tank, 500 gal (K44)
Gasoline Storage Tank, 350 gal (B52)
R279 Gasoline Storage Tank, 225 gal
Vacuum Truck (R52)
Internal Combustion Engines ≤ 50 brake horsepower