SWD PERMITTING MEMORANDUM
&
TECHNICAL EVALUATION AND PRELIMINARY DETERMINATION

TO: Cindy Zhang-Torres, P.E.,
Air Permitting Manager

FROM: David Zell, Air Permitting Engineering Specialist

DATE: 08/09/11

SUBJECT: REVISED DRAFT Initial Title V Air Operation Permit No. 1190042-007-AV
DRAFT Air Construction Permit 1190042-008-AC
American Cement Company, LLC, Sumterville Cement Plant

Day 90: 10/31/11 for 008-AC (Not Applicable for 007-AV)

On 04/05/11, the Department issued the written notice and DRAFT permit for the American Cement Company, LLC (American Cement) initial Title V air operation permit project (1190042-007-AV). When an extended period of time had passed with no information on the publication of the public notice, American Cement was contacted by email on 06/16/11 and 07/13/11 to find out the status of publication of the public notice. We were informed each time that the applicant and their consultant were still reviewing the DRAFT permit, would have comments to submit prior to publication of the public notice, and planned on requesting a meeting to discuss their comments. On 07/25/11, American Cement and their consultant, John Koogler of Koogler & Associates, met with Cindy Zhang-Torres and me at the SW District office to discuss their comments and requested changes on the DRAFT permit. On 07/26/11 their comments were formally submitted by email in the form of an electronic MS WORD copy of the DRAFT permit with the requested changes and associated comments shown. The public notice for this project was not published, pending review of their comments.

The requested changes include corrections and clarifications to process descriptions, clarifications added to specific conditions or notes to specific conditions, and a correction to the interim NESHAP Subpart LLL THC (total hydrocarbon) limitation for EU No. 003 (Pyroprocessing System). These requested changes will require revisions to the DRAFT Title V permit and issuance of a REVISED DRAFT Title V written notice and permit.

On 07/27/11, American Cements consultant submitted an additional comment by email and followed that up with an 08/01/11 call to Cindy Zhang-Torres reporting their call to DARM concerning this last requested change, which was to delete a requirement included in the initial PSD construction permit for this facility (issued by DARM) to make emissions data available on a real-time basis on the company website. Based on that call to DARM, it was determined that the requested deletion could be made but that it would require a construction permit revision. It was agreed that the SW District would issue this AC revision co-processed with the REVISED DRAFT of the Title V permit (which would also incorporate the revision being made in the construction permit). The application for this AC revision was received on 08/05/11.

On 07/26/11, Cindy Zhang-Torres and I called Ana Oquendo of EPA Region IV to inform her of the status of this project, which she has indicated that she has targeted for review. On that same day, Cindy also forwarded to Ana American Cement's comments on the Draft Title V permit.

This memo serves as the technical evaluation and preliminary determination for the construction permit project (008-AC) as there is no change in potential emissions; and there is no rule applicability issues associated with making the requested change to the construction permit.

I recommend that this REVISED DRAFT AV and DRAFT AC permits package be sent out as attached and submit it for your review and approval.