AMERICAN CEMENT

January 30, 2013

United States Environmental Protection Agency, Region 4
Air, Pesticides, and Toxic Management Division
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960
(404) 562-9077

Re: Submittal of §63.10(e)(3)(vi) Summary Report and §63.10(e)(3)(i) Excess Emissions and CMS Performance Report
Title V Permit No. 1190042-007-AV
American Cement, LLC – Sumterville, Florida

In accordance with the provisions of 40 CFR Part 63.10(e)(3), American Cement Company, LLC. is submitting this Summary report with Excess Emissions and CMS Performance Report for the Sumterville, Florida facility. This report covers the period July 1 through December 31, 2012.

By signing this letter, I certify that I am the responsible official as that term is defined in 40 CFR 63.2. I further certify, based on reasonable inquiry that the enclosed report is to the best of my knowledge and belief true, accurate, and complete.

Sincerely,

AMERICAN CEMENT COMPANY, LLC

Cary Cohrs
President

cc: Mr. Jeffery F. Koerner, FDEP, Tallahassee
Mr. Tom Lubozynski, FDEP, Central District
Mr. William Wall, American Cement Company, LLC
Ms. Candice Hoisington, American Cement Company, LLC

4750 E C 470 • P.O. Box 445 • Sumterville, FL 33585 • Phone 352.569.5393 • Fax 352.569.5397

SUMMARY REPORT – GASEOUS AND OPACITY EXCESS EMISSIONS AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

American Cement Company, LLC
4750 East CR 470
Sumterville, FL 33585

Hazardous Air Pollutants monitored at the source:

- SO_2
- CO
- NOx
- VOC
- CO_2 (no compliance limits)
- Hg (not for compliance purposes)
- Opacity
- Temperature, as a surrogate for dioxin/furan emissions

Description of the process units:

The primary affected source at the facility is the kiln, which is used to produce clinker by heating limestone and other materials for subsequent production of Portland cement. Emissions from the kiln are controlled by a baghouse and exhausted through the main stack. Clinker from the kiln is sent through a clinker cooler, which is controlled by the main baghouse before exhausting to the atmosphere. There is also several material handling points within the plant that are potential sources of emissions.

Emission and operating parameter limitations specified in standard:

Each emissions limit is listed with the relevant Excess Emissions and CMS Performance Table. Per the list of relevant standards in Table 1 of 40 CFR 63.1342:

- Main stack exhaust is limited to 0.40 ng TEQ/dscm for dioxin/furan emissions
- Main stack exhaust is limited to 10% opacity on a six-minute block average basis
- All other exhausts are limited to 5% opacity on a six-minute block average basis

EXCESS EMISSIONS AND CMS PERFORMANCE

SO2

Emissions Limit: 0.20 lb/ton of clinker; 24-hour rolling average
25.0 lb/hr; 24 hour rolling average

Reporting Period: July 1, 2012 through December 31, 2012

Monitor Manufacturer: Sick Maihak
Model Number: MCS100E
Date of Last CMS Certification or Audit: December 15, 2012
Total source operating time in reporting period: 2,733 hours

Emissions data summary (hours)		CMS performance summary (hours)	
1. Duration of excess emissions in reporting period due to :		1. CMS downtime in reporting period due to:	
a. Startup / shutdown	16	a. Monitor equipment malfunctions	8
b. Control equipment problems	0	b. Non-Monitor equipment malfunctions	0
c. Process problems	0	c. Quality assurance calibration	8
d. Other known causes	0	d. Other known causes	0
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	16	2. Total CMS downtime	16
3. Total duration of excess emissions X (100) / [Total Source operating time]	0.59 %	3. [Total CMS Downtime] x (100) / [Total source operating time]	0.59 %

CO

Emission Limits: 2.9 lb/ton clinker, 30-day rolling average
362.5 lb/hr, 30-day rolling average

Reporting Period: July 1, 2012 through December 31, 2012

Monitor Manufacturer: Sick Maihak
Model Number: MCS100E
Date of Last CMS Certification or Audit December 15, 2012
Total source operating time in reporting period: 2,733 hours

Emissions data summary (hours)		CMS performance summary (hours)	
1. Duration of excess emissions in reporting period due to :		1. CMS downtime in reporting period due to:	
a. Startup / shutdown	0	a. Monitor equipment malfunctions	9
b. Control equipment problems	0	b. Non-Monitor equipment malfunctions	0
c. Process problems	0	c. Quality assurance calibration	6
d. Other known causes	0	d. Other known causes	0
e. Unknown causes	0	e. Unknown causes	14
2. Total duration of excess emissions	0	2. Total CMS downtime	16
3. Total duration of excess emissions X (100) / [Total Source operating time]	0 %	3. [Total CMS Downtime] x (100) / [Total source operating time]	0.59%

NO + NO2 = NOx

Emissions Limit: 1.95 lb/ton clinker; 30-day rolling average
243.8 lb/hr; 30-day rolling average

Reporting Period: July 1, 2012 through December 31, 2012

NO

Monitor Manufacturer: Sick Maihak
Model Number: MCS100E
Date of Last CMS Certification or Audit December 15, 2012
Total source operating time in reporting period: 2,733 hours

Emissions data summary (hours)		CMS performance summary (hours)	
1. Duration of excess emissions in reporting period due to :		1. CMS downtime in reporting period due to:	
a. Startup / shutdown	0	a. Monitor equipment malfunctions	27
b. Control equipment problems	0	b. Non-Monitor equipment malfunctions	0
c. Process problems	0	c. Quality assurance calibration	3
d. Other known causes	0	d. Other known causes	0
e. Unknown causes	0	e. Unknown causes	1
2. Total duration of excess emissions	0	2. Total CMS downtime	31
3. Total duration of excess emissions X (100) / [Total Source operating time]	0 %	3. [Total CMS Downtime] x (100) / [Total source operating time]	1.13 %

NO2

Monitor Manufacturer: Sick Maihak
Model Number: MCS100E
Date of Last CMS Certification or Audit December 15, 2012
Total source operating time in reporting period: 2,733 hours

Emissions data summary (hours)		CMS performance summary (hours)	
1. Duration of excess emissions in reporting period due to :		1. CMS downtime in reporting period due to:	
a. Startup / shutdown	0	a. Monitor equipment malfunctions	9
b. Control equipment problems	0	b. Non-Monitor equipment malfunctions	0
c. Process problems	0	c. Quality assurance calibration	9
d. Other known causes	0	d. Other known causes	0
e. Unknown causes	0	e. Unknown causes	1
2. Total duration of excess emissions	0	2. Total CMS downtime	19
3. Total duration of excess emissions X (100) / [Total Source operating time]	0 %	3. [Total CMS Downtime] x (100) / [Total source operating time]	0.70%

VOC/THC

Emissions Limit:	0.12 lb/ton of clinker, 30-day block average 15.0 lb/hr, 30-day block average 20ppmvd (as propane) @ 7% O_2
Reporting Period:	July 1, 2012 through December 31, 2012
Monitor Manufacturer:	Sick Maihak
Model Number:	EuroFID 3010
Date of Last CMS Certification or Audit	September, 26, 2012*
Total source operating time in reporting period:	2,733 hours

Emissions data summary (hours)		CMS performance summary (hours)	
1. Duration of excess emissions in reporting period due to :		1. CMS downtime in reporting period due to:	
a. Startup /shutdown	0	a. Monitor equipment malfunctions	614
b. Control equipment problems	0	b. Non-Monitor equipment malfunctions	0
c. Process problems	0	c. Quality assurance calibration	28
d. Other known causes	0	d. Other known causes	0
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	0	2. Total CMS downtime	642
3. Total duration of excess emissions X (100) / [Total Source operating time]	0.00 %	3. [Total CMS Downtime] x (100) / [Total source operating time]	23.50%**

* The EuroFID 3010 was not operable during the 4th quarter CGA.

** 1) EuroFID Model 3010 FID sent to Sick for repair of internal air leaks and gets 5 year rebuild.
2) EuroFID Model 3010 Controller sent to Sick for replacement of bad circuit boards.
3) EuroFID Model 30101 FID sent to Sick for replacement of igniter and igniter electrode.

OPACITY

Emissions Limit	10% opacity, 6-minute block
Reporting Period:	July 1, 2012 through December 31, 2012
Monitor Manufacturer:	Sick Maihak
Model Number:	OMD-41-M321
Date of Last CMS Certification or Audit	December 11, 2012
Total source operating time in reporting period:	161,207 minutes

Emissions data summary (minutes)		CMS performance summary (minutes)	
1. Duration of excess emissions in reporting period due to :		1. CMS downtime in reporting period due to:	
a. Startup / shutdown	360	a. Monitor equipment malfunctions	54
b. Control equipment problems	516	b. Non-Monitor equipment malfunctions	180
c. Process problems	270	c. Quality assurance calibration	1446
d. Other known causes	0	d. Other known causes	0
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	1146	2. Total CMS downtime	1680
3. Total duration of excess emissions X (100) / [Total Source operating time]	0.71 %	3. [Total CMS Downtime] x (100) / [Total source operating time]	1.04%

INLET TEMPERATURE

Temperature Limit	Raw Mill On: 332° F, 180-minute rolling average
Date of Dioxin / Furan Report:	August 27, 2010
Temperature Limit	Raw Mill Off: 400° F, 180-minute rolling average
Date of Dioxin / Furan Report:	October 18, 2010
Reporting Period:	July 1, 2012 through December 31, 2012
Thermocouple Manufacturer:	Pyco
Model Number:	PK-375-310-D-42-B-13A-(Y)
Serial Number:	ACC-003
Date of Thermocouple installation:	August 15, 2012
Thermocouple Manufacturer:	Pyco
Model Number:	PK-375-310-D-42-B-13A-(Y)
Serial Number:	ACC-004
Date of Thermocouple installation:	November 11, 2012
Total source operating time in reporting period:	161,207 minutes

Emissions data summary (minutes)		CMS performance summary (minutes)	
1. Duration of excess emissions in reporting period due to :		1. CMS downtime in reporting period due to:	
a. Startup / shutdown	0	a. Monitor equipment malfunctions	0
b. Control equipment problems	0	b. Non-Monitor equipment malfunctions	0
c. Process problems	149	c. Quality assurance calibration	0
d. Other known causes	0	d. Other known causes	0
e. Unknown causes	0	e. Unknown causes	0
2. Total duration of excess emissions	149	2. Total CMS downtime	0
3. Total duration of excess emissions X (100) / [Total Source operating time]	0.09%	3. [Total CMS Downtime] x (100) / [Total source operating time]	0.00%

CO2 CEMS

Reporting Period:	July 1, 2013 through December 31, 2012
Monitor Manufacturer:	Sick Maihak
Model Number:	MCS100E
Date of Last CMS Certification or Audit	December 15, 2012
Total source operating time in reporting period:	2,733 hours

CMS performance summary (minutes)	
1. CMS downtime in reporting period due to:	
a. Monitor equipment malfunctions	10
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	10
d. Other known causes	0
e. Unknown causes	0
2. Total CMS downtime	20
3. [Total CMS Downtime] x (100) / [Total source operating time]	0.73%

MERCURY CEMS

Reporting Period:	July 1, 2013 through December 31, 2012
Monitor Manufacturer:	Thermo Fisher Scientific
Model Number:	80i
Date of Last CMS Certification or Audit	December 12, 2012
Total source operating time in reporting period:	2,733 hours

CMS performance summary (minutes)	
1. CMS downtime in reporting period due to:	
a. Monitor equipment malfunctions	57
b. Non-Monitor equipment malfunctions	0
c. Quality assurance calibration	34
d. Other known causes	0
e. Unknown causes	3
2. Total CMS downtime	94
3. [Total CMS Downtime] x (100) / [Total source operating time]	3.44%

ADDITIONAL INFORMATION REQUIRED BY NESHAP SUBPART LLL

Per 40 CFR 63.1354(b)(9)

- Exceedances of maximum control device inlet temperature sensors – 149 Minutes
- Failures to calibrate thermocouples – None
- Results of combustion system components inspection. – July 3, 2012
- Failure to comply with any provision of the operations and maintenance plan - None

American Cement, LLC is submitting the startup, shutdown, and malfunction report with this report under separate cover. As noted in §63.10(d)(5)(i), the startup, shutdown, and malfunction report can be submitted simultaneously with the summary report.