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January 28, 2011

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AIR REGULATION

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. 1190042-001-AC
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, FL facility. This report covers the period July 1 through December 31, 2010.

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.

Best Regards,

AMERICAN CEMENT COMPANY, LLC

Cary Cohrs
President

cc: Ms. Trina Vielhauer, FDEP, Tallahassee
Ms. Danielle Henry, FDEP, SW District
Mr. William Wall, American Cement Company

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

Name and address (physical location) of the source:

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

Hazardous Air Pollutants monitored at the source:

- SO₂
- CO
- NO_x
- VOC
- 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, 2010 through Dec. 31, 2010

Monitor Manufacturer: Sick Maihak
Model Number: MCS100E
Date of Last CMS Certification or Audit: March 25 to 31, 2010
Total source operating time in reporting period: 2,403 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..... 26	a. Monitor equipment malfunctions..... 8
b. Control equipment problems..... 0	b. Non-Monitor equipment malfunctions..... 0
c. Process problems..... 0	c. Quality assurance calibration..... 2
d. Other known causes..... 0	d. Other known causes..... 3
e. Unknown causes..... 0	e. Unknown causes..... 0
2. Total duration of excess emissions..... 0	2. Total CMS downtime..... 13
3. Total duration of excess emissions X (100) / [Total Source operating time]..... 1.08 %	3. [Total CMS Downtime] x (100) / [Total source operating time]..... 0.54 %

CO

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

Reporting Period: July 1, 2010 through Dec. 31, 2010

Monitor Manufacturer: Sick Maihak
Model Number: MCS100E
Date of Last CMS Certification or Audit: March 24 to 31, 2010
Total source operating time in reporting period: 2,403 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..... 8
b. Control equipment problems..... 0	b. Non-Monitor equipment malfunctions..... 0
c. Process problems..... 0	c. Quality assurance calibration..... 2
d. Other known causes..... 0	d. Other known causes..... 3
e. Unknown causes..... 0	e. Unknown causes..... 0
2. Total duration of excess emissions..... 0	2. Total CMS downtime..... 13
3. Total duration of excess emissions X (100) / [Total Source operating time]..... 0 %	3. [Total CMS Downtime] x (100) / [Total source operating time]..... 0.54%

NO + NO2 = NOx

Emissions Limit: 3.0 lb/ton clinker; 30-day rolling average
 375 lb/hr; 30-day rolling average
 • Valid for initial 155,000 tons clinker produced after certification;
 4-1-2010.

Emissions Limit: 1.95 lb/ton clinker; 30-day rolling average
 243.8 lb/hr; 30-day rolling average
 • Beginning August 30, 2010

Reporting Period: July 1, 2010 through Dec. 31 2010

NO

Monitor Manufacturer: Sick Maihak
 Model Number: MCS100E
 Date of Last CMS Certification or Audit: March 25 and April 1 to 7, 2010
 Total source operating time in reporting period: 2,403 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..... 14
b. Control equipment problems..... 0	b. Non-Monitor equipment malfunctions..... 0
c. Process problems..... 0	c. Quality assurance calibration..... 18
d. Other known causes..... 0	d. Other known causes..... 8
e. Unknown causes..... 0	e. Unknown causes..... 0
2. Total duration of excess emissions..... 0	2. Total CMS downtime..... 40
3. Total duration of excess emissions X (100) / [Total Source operating time]..... 0 %	3. [Total CMS Downtime] x (100) / [Total source operating time]..... 1.67 %

NO2

Monitor Manufacturer: Sick Maihak
 Model Number: MCS100E
 Date of Last CMS Certification or Audit: March 25 and April 1 to 7, 2010
 Total source operating time in reporting period: 2,403 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..... 13
b. Control equipment problems..... 0	b. Non-Monitor equipment malfunctions..... 0
c. Process problems..... 0	c. Quality assurance calibration..... 23
d. Other known causes..... 0	d. Other known causes..... 8
e. Unknown causes..... 0	e. Unknown causes..... 0
2. Total duration of excess emissions..... 0	2. Total CMS downtime..... 44
3. Total duration of excess emissions X (100) / [Total Source operating time]..... 0 %	3. [Total CMS Downtime] x (100) / [Total source operating time]..... 1.83 %

VOC/THC

Emissions Limit: 0.12 lb/ton of clinker, 30-day block average
 15.0 lb/hr, 30-day block average
 50ppmvd (as propane) @ 7% O₂

Reporting Period: July 1, 2010 through Dec. 31, 2010

Monitor Manufacturer: Sick Maihak
 Model Number: EuroFID 3010
 Date of Last CMS Certification or Audit: March 25 to 31, 2010
 Total source operating time in reporting period: 2,403 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..... 432	a. Monitor equipment malfunctions..... 8
b. Control equipment problems..... 0	b. Non-Monitor equipment malfunctions..... 0
c. Process problems..... 0	c. Quality assurance calibration..... 1
d. Other known causes..... 0	d. Other known causes..... 3
e. Unknown causes..... 0	e. Unknown causes..... 0
2. Total duration of excess emissions..... 432	2. Total CMS downtime..... 24
3. Total duration of excess emissions X (100) / [Total Source operating time]..... 18 %	3. [Total CMS Downtime] x (100) / [Total source operating time]..... 1.00%

OPACITY

Emissions Limit 10% opacity, 6-minute block

Reporting Period: July 1, 2010 through Dec. 31, 2010

Monitor Manufacturer: Sick Maihak
 Model Number: OMD-41-M321
 Date of Last CMS Certification or Audit: Dec. 15, 2010
 Total source operating time in reporting period: 141,907 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..... 0	c. Quality assurance calibration..... 673
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..... 687
3. Total duration of excess emissions X (100) / [Total Source operating time]..... 0 %	3. [Total CMS Downtime] x (100) / [Total source operating time]..... 0.48%

INLET TEMPERATURE

Temperature Limits Raw Mill On: 322° F, 180-minute rolling average
 Raw Mill Off: 396° F, 180-minute rolling average

Date of Dioxin / Furan Report: May 13, 2010

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, 2010 through Dec. 31, 2010

Thermocouple Manufacturer: Pyco
Model Number: PK-375-310-D-42-B-13A-(Y)
Serial Number: ACC-003
Date of Thermocouple installation: June 23, 2010

Thermocouple Manufacturer: Pyco
Model Number: PK-375-310-D-42-B-13A-(Y)
Serial Number: ACC-002
Date of Thermocouple installation: Sept. 16, 2010

Thermocouple Manufacturer: Pyco
Model Number: PK-375-310-D-42-B-13A-(Y)
Serial Number: ACC-003
Date of Thermocouple installation: Dec. 14, 2010

Total source operating time in reporting period: 141,907 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..... 54	a. Monitor equipment malfunctions..... 116
b. Control equipment problems..... 0	b. Non-Monitor equipment malfunctions..... 0
c. Process problems..... 270	c. Quality assurance calibration..... 7
d. Other known causes..... 0	d. Other known causes..... 0
e. Unknown causes..... 0	e. Unknown causes..... 1
2. Total duration of excess emissions..... 324	2. Total CMS downtime..... 124
3. Total duration of excess emissions X (100) / [Total Source operating time]..... 0.23%	3. [Total CMS Downtime] x (100) / [Total source operating time]..... 0.09%

ADDITIONAL INFORMATION REQUIRED BY NESHAP SUBPART LLL

Per 40 CFR 63.1354(b)(9)

- Exceedances of maximum control device inlet temperature sensors – 324 Minutes
- Failures to calibrate thermocouples – None
- Results of combustion system components inspection. – Inspection performed during December 2010 with recommendation to change two pressure gauges.
- 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.



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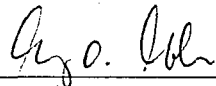
United States Environmental Protection Agency, Region 4
Air, Pesticides, and Toxic Management Division
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

**Re: Submittal of §63.10(d)(5) Periodic Startup, Shutdown, and Malfunction Report
American Cement Company, LLC, Sumterville, FL
Title V Permit No. 1190042-001-AC**

In accordance with the provisions of 40 CFR Part 63.10(d)(5)(i), American Cement Company, LLC is submitting this periodic *Startup, Shutdown, and Malfunction Report* for the Sumterville, Florida facility.

Reports are only required if a startup, shutdown, or malfunction (SSM) occurred during the reporting period. This report also includes a summary of the startup and shutdown events where the SSM Plan was not followed, and an exceedance of the relevant standard occurred. In the event of such occurrences, American Cement Company, LLC submitted to your office within seven working days after the end of the event when the SSM Plan was *not* followed.

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



Cary Cohrs, President

1/26/11

Date

Copy: Ms. Trina Vielhauer, FDEP, Tallahassee
Ms. Danielle Henry, FDEP, SW District
Mr. William Wall, American Cement Company, LLC

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

CONTACT PERSON: C. L. Robertson
Environmental Manager

Reporting Period: July 1 through December 31, 2010

PERIODIC SSM REPORT

Actions taken in response to startup and shutdown events during the reporting period were consistent with those outlined in the facility's SSM Plan, with the exception of those startup and shutdown events where the SSM plan was not followed and an exceedance of the relevant standard occurred. Startup and shutdown events where the SSM Plan was *not* followed and an exceedance of the relevant standard occurred are listed below in Table 1:

TABLE 1; STARTUP AND SHUTDOWN EVENTS WHERE SSM PLAN NOT FOLLOWED

Date	Emission Unit Number/Description	Duration	Reasons for Not Following SSM Plan	Exceedances
August 2 through 3	003	26 hours	The kiln was shut down on an emergency basis due to refractory failure. There was 60 tons of a coal and petroleum coke mixture in the raw coal bin as fuel when the kiln was shut down. Upon start up this mixture had to be used when solid fuel was introduced. This mixture of fuel, not normally used for start up, contributed to high SO ₂ emissions.	99.69 lb/hr of SO ₂

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

CONTACT PERSON: C. L. Robertson
Environmental Manager

Reporting Period: July 1 through December 31, 2010

PERIODIC SSM REPORT

Actions taken in response to malfunction events during this reporting period were consistent with those outlined in the facility's SSM Plan, with the exception of the following events. Malfunction events where the SSM Plan was *not* followed and excess emissions occurred are listed below in **Table 2**:

TABLE 2; MALFUNCTIONS WHERE SSM PLAN NOT FOLLOWED

Date	Emission Unit Number/ Description	Duration	Reasons for Not Following SSM Plan	Exceedances
N/A				

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

CONTACT PERSON: C. L. Robertson
Environmental Manager

Reporting Period: July 1 through December 31, 2010

PERIODIC SSM REPORT

Malfunction events during this reporting period where the SSM Plan was followed and excess emissions occurred are listed below in Table 3:

TABLE 3; MALFUNCTIONS WHERE SSM PLAN WAS FOLLOWED

Date	Emission Unit Number/Description	Duration	Reasons for Exceedences	Exceedences
July 22	EU 002	2 minutes	A louver automatically opened to allow cooling after an unexpected shutdown of the raw mill. The system was slightly positive which cause visible emissions	Opacity: > 5%
Sept. 16	EU 003	54 minutes	The water spray system in the Gas Conditioning Tower (GCT) malfunctioned allowing the temperature at the entrance of the main baghouse to rise above 396°F	Main baghouse inlet temperature above 396° F
Nov. 14 & 15	EU 003	270 minutes	The water spray system in the GCT malfunctioned allowing the temperature at the entrance of the main baghouse to rise above 400°F	Main baghouse inlet temperature above 400° F