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DIVISION OF AIR RESOURCE MANAGEMENT

July 30, 2012

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

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 January 1 through June 30, 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

Ms. Danielle Henry, FDEP, SW District

Mr. William Wall, American Cement Company, LLC

Ms. Candice Hoisington, American Cement Company, LLC

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:

- \bullet SO₂
- CO
- NOx
- VOC
- 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:

January 1, 2012 through June 30, 2012

Monitor Manufacturer:

Model Number:

Date of Last CMS Certification or Audit:

Total source operating time in reporting period:

Sick Maihak

MCS100E

May 23, 2012

2,703 hours

Emissions data summary (hours)	CMS performance summary (hours)
1. Duration of excess emissions in reporting period due to: a. Startup / shutdown	1. CMS downtime in reporting period due to: 11 a. Monitor equipment malfunctions. 11 b. Non-Monitor equipment malfunctions. 0 c. Quality assurance calibration. 6 d. Other known causes. 0 e. Unknown causes. 4 2. Total CMS downtime. 21 3. [Total CMS Downtime] x (100) / [Total source operating time]. 0.78 %

CO

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

Reporting Period: January 1, 2012 through June 30, 2012

Monitor Manufacturer:

Model Number:

Date of Last CMS Certification or Audit

Total source operating time in reporting period:

Sick Maihak

MCS100E

May 23, 2012

2,703 hours

Emissions data summary (hours)	CMS performance summary (hours)	
1. Duration of excess emissions in reporting period due to: a. Startup / shutdown	1. CMS downtime in reporting period due to: a. Monitor equipment malfunctions	

NO + NO2 = NOx

Emissions Limit:

1.95 lb/ton clinker; 30-day rolling average

243.8 lb/hr; 30-day rolling average

Reporting Period:

January 1, 2012 through June 30, 2012

NO

Monitor Manufacturer:

Model Number:

Date of Last CMS Certification or Audit

Total source operating time in reporting period:

Sick Maihak

MCS100E

May 23, 2012

2,703 hours

Emissions data summary (hours)	CMS performance summary (hours)		
1. Duration of excess emissions in reporting period due to: a. Startup / shutdown	1. CMS downtime in reporting period due to: a. Monitor equipment malfunctions		

NO₂

Monitor Manufacturer:

Model Number:

Date of Last CMS Certification or Audit

Total source operating time in reporting period:

Sick Maihak

MCS100E

May 23, 2012

2,703 hours

Emissions data summary (hours)	CMS performance summary (hours)	
1. Duration of excess emissions in reporting period due to: a. Startup / shutdown	1. CMS downtime in reporting period due to: a. Monitor equipment malfunctions. 4 b. Non-Monitor equipment malfunctions. 0 c. Quality assurance calibration. 22 d. Other known causes. 0 e. Unknown causes. 4 2. Total CMS downtime. 30 3. [Total CMS Downtime] x (100) / [Total source operating time]. 1.11%	

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% O₂

Reporting Period:

January 1, 2012 through June 30, 2012

Monitor Manufacturer:

Model Number:

Date of Last CMS Certification or Audit

Total source operating time in reporting period:

Sick Maihak EuroFID 3010

May 25, 2012 2,703 hours

Emissions data summary (hours)	CMS performance summary (hours)		
1. Duration of excess emissions in reporting period due to: a. Startup /shutdown	1. CMS downtime in reporting period due to: a. Monitor equipment malfunctions		

OPACITY

Emissions Limit

10% opacity, 6-minute block

Reporting Period:

January 1, 2012 through June 30, 2012

Monitor Manufacturer:

Model Number:

Date of Last CMS Certification or Audit

Sick Maihak

OMD-41-M321

November 14, 2011

Total source operating time in reporting period:

160,656 minutes

Emissions data summary (minutes)	CMS performance summary (minutes)		
1. Duration of excess emissions in reporting period due to: a. Startup / shutdown	1. CMS downtime in reporting period due to: 72 a. Monitor equipment malfunctions. 72 b. Non-Monitor equipment malfunctions. 0 c. Quality assurance calibration. 1398 d. Other known causes. 0 e. Unknown causes. 246 2. Total CMS downtime. 1716 3. [Total CMS Downtime] x (100) / [Total source operating time]. 1.07%		

INLET TEMPERATURE

Temperature Limit

Date of Dioxin / Furan Report:

Raw Mill On:

332° F, 180-minute rolling average

August 27, 2010

Temperature Limit

Date of Dioxin / Furan Report:

Raw Mill Off:

400° F, 180-minute rolling average

October 18, 2010

Reporting Period:

January 1, 2012 through June 30, 2012

Thermocouple Manufacturer:

Model Number:

PK-

Serial Number:

PK-375-310-D-42-B-13A-(Y)

ACC-003

February 21, 2012

Thermocouple Manufacturer:

Date of Thermocouple installation:

Model Number: Serial Number: Pyco

PK-375-310-D-42-B-13A-(Y)

ACC-002

Date of Thermocouple installation:

May 27, 2012

Total source operating time in reporting period:

160,656 minutes

Emissions data summary (minutes)	CMS performance summary (minutes)
1. Duration of excess emissions in reporting period due to: a. Startup / shutdown	1. CMS downtime in reporting period due to: a. Monitor equipment malfunctions. 0 b. Non-Monitor equipment malfunctions. 0 c. Quality assurance calibration. 0 d. Other known causes. 0 e. Unknown causes. 725 2. Total CMS downtime. 725 3. [Total CMS Downtime] x (100) / [Total source operating time]. 0.45%

MERCURY CEMS

Reporting Period:

January 1, 2012 through June 30, 2012

Monitor Manufacturer:

Thermo Fisher Scientific

Model Number:

80i

Date of Last CMS Certification or Audit

May 24, 2012

Total source operating time in reporting period:

2,703 hours

CMS performance summary (minutes)	
CMS downtime in reporting period due to:	
a. Monitor equipment malfunctions	521
b. Non-Monitor equipment malfunctions	
c. Quality assurance calibration	46
d. Other known causes	
e. Unknown causes	
2. Total CMS downtime	
3. [Total CMS Downtime] x (100) / [Total source op	
time]	

ADDITIONAL INFORMATION REQUIRED BY NESHAP SUBPART LLL

Per 40 CFR 63.1354(b)(9)

- Exceedances of maximum control device inlet temperature sensors 451 Minutes
- Failures to calibrate thermocouples None
- Results of combustion system components inspection. To be done 2nd half 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.



July 30, 2012

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. 1190042-007-AV

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. This report covers the period January 1 through June 30, 2012.

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

Ooto

Date

Copy: Mr. Jeffery F. Koerner, FDEP, Tallahassee

Ms. Danielle Henry, FDEP, SW District

Mr. William Wall, American Cement Company, LLC

Ms. Candice Hoisington, 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:

January 1 through June 30, 2012

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
N/A		· .		

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
1-8-2012	EU-003	10 Hours	Raw Mill malfunction did not allow kiln feed availability for SO2 scrubbing	10 Hour Average 25.75 lb/hr
5-6,7-2012	EU-003	23 Hours	Raw Mill malfunction did not allow kiln feed availability for SO2 scrubbing	23 Hour Average 44.89 lb/hr

LOCATION:

American Cement Company, LLC

4750 East CR 470 Sumterville, FL 33585 CONTACT PERSON: C. L. Robertson

Environmental Manager

Reporting Period:

January 1 through June 30, 2012

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	Exceedances
2-7-2012	EU-003	18 Minutes	Baghouse failed to control opacity during air flow transitions for raw mill on/off condition	6-minute opacity >10%
2-8-2012	EU-003	6 Minutes	Baghouse failed to control opacity during air flow transitions for raw mill on/off condition	6-minute opacity >10%
2-8-2012	EU-003	426 Minutes	Baghouse compartments open/closed to locate opacity problem	6-minute opacity >10%
4-15-2012	EU-003	24 Minutes	Compressed air pressure low causing high DP	6-minute opacity >10%
5-23-2012	EU-003	54 Minutes	Baghouse compartment #4 closed to locate bags to replace	6-minute opacity >10%
5-24-2012	EU-003	66 Minutes	Baghouse compartment #4 closed to change bags as needed, increases DP	6-minute opacity >10%
5-30-2012	EU-003	30 Minutes	Baghouse compartment #4 closed to change bags as needed, increases DP	6-minute opacity >10%
6-2-2012	EU-003	162 Minutes	Baghouse compartment #4 closed to change bags as needed, increases DP	6-minute opacity >10%
6-3-2012	EU-003	336 Minutes	Baghouse compartment #4 closed to change bags as needed, increases DP	6-minute opacity >10%
6-4-2012	EU-003	30 Minutes	Baghouse compartment #4 closed to change bags as needed, increases DP	6-minute opacity >10%
6-5-2012	EU-003	6 Minutes	Baghouse failed to control opacity during air flow transitions for raw mill on/off condition	6-minute opacity >10%

LOCATION:

American Cement Company, LLC 4750 East CR 470

Sumterville, FL 33585

CONTACT PERSON: C. L. Robertson

Environmental Manager

Reporting Period:

January 1 through June 30, 2012

	Keporting re		1 through June 30, 2012	
6-6-2012	EU-003	12 Minutes	Baghouse failed to control opacity during air flow transitions for raw mill on/off condition	6-minute opacity >10%
6-7-2012	EU-003	12 Minutes	Baghouse failed to control opacity during air flow transitions for raw mill on/off condition	6-minute opacity >10%
6-9-2012	EU-003	24 Minutes	Baghouse failed to control opacity during air flow transitions for raw mill on/off condition	6-minute opacity >10%
6-10-2012	EU-003	6 Minutes	Baghouse failed to control opacity during air flow transitions for raw mill on/off condition	6-minute opacity >10%
6-11-2012	EU-003	6 Minutes	Baghouse failed to control opacity during air flow transitions for raw mill on/off condition	6-minute opacity >10%
6-12-2012	EU-003	18 Minutes	Baghouse failed to control opacity during air flow transitions for raw mill on/off condition	6-minute opacity >10%
6-14-2012	EU-003	6 Minutes	Baghouse compartment #5 closed to change bags as needed, increases DP	6-minute opacity >10%
6-15-2012	EU-003	6 Minutes	Baghouse compartment #6 closed to change bags as needed, increases DP	6-minute opacity >10%
6-24-2012	EU-003	6 Minutes	Baghouse failed to control opacity during air flow transitions for raw mill on/off condition	6-minute opacity >10%
6-25-2012	EU-003	6 Minutes	Baghouse failed to control opacity during air flow transitions for raw mill on/off condition	6-minute opacity >10%



July 30, 2012

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 40 CFR 64.9(a) and Rule 62-213.440(1)(b)3.a, F.A.C. CAM Summary Report and QIP Actions, January 1, 2012 through June 30, 2012
Title V Permit No. 1190042-007-AV
American Cement, LLC – Sumterville, Florida

In accordance with the provisions of 40 CFR Part 64.9(a) and Rule 62-213.440(1)(b)3.a., American Cement Company, LLC. are submitting the Summary Report and QIP Actions taken for compliance with the CAM Plan for the Sumterville, Florida facility. This report covers the period January 1 through June 30, 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

Ms. Danielle Henry, FDEP, SW District

Mr. William Wall, American Cement Company, LLC

Ms. Candice Hoisington, American Cement Company, LLC

CAM SUMMARY REPORT Title V Permit No. 1190042-007-AV January 1, 2012 through June 30, 2012

Table 1 Excursions of CAM Opacity 5%

Total Source Operating Time: 160,656 Minutes

Emissions data summary (minutes)		
1. Duration of excursion of CAM limits in reporting period due to :		
a. Startup / shutdown		
b. Control equipment problems		
c. Process problems <u>15,558</u>		
d. Other known causes <u>0</u>		
e. Unknown causes0		
2. Total duration of >5% Opacity		
3. Total duration of >5% Opacity X (100) / [Total Source operating time]		

Table 2 Exceedances of Permit Opacity 10%

Total Source Operating Time: 160,656 Minutes

Emissions Exceedance data summary (minutes)
Duration of excess emissions in reporting period due to :
a. Startup / shutdown
b. Control equipment problems
c. Process problems210_
d. Other known causes0
e. Unknown causes0
2. Total duration of excess emissions
3. Total duration of excess emissions X (100) / [Total Source operating time]

Table 3 Opacity Monitor Performance

Total Source Operating Time:

160,656

Minutes

CMS performance summary (minutes)
1. CMS downtime in reporting period due to:
a. Monitor equipment malfunctions
b. Non-Monitor equipment malfunctions0
c. Other known causes0
d. Unknown causes
2. Total CMS downtime <u>318</u>
3. [Total CMS Downtime] x (100) / [Total source operating time]

Table 4 Excursions of CAM Differential Pressure 4" w.c to 7" w.c.

Total Source Operating Time:

160,656

Minutes

Emissions data summary (minutes)
1. Duration of excursion of CAM limits in reporting period due to :
a. Startup / shutdown
b. Control equipment problems
c. Process problems
d. Other known causes0
e. Unknown causes <u>0</u>
2. Total duration of DP >7" w.c
3. Total duration of DP >7" w.c. X (100) / [Total Source operating time]

Table 5 Differential Pressure Monitor Performance

Total Source Operating Time: 160,656 Minutes

CMS performance summary (minutes)
1. CMS downtime in reporting period due to:
a. Monitor equipment malfunctions0
b. Non-Monitor equipment malfunctions0_
c. Other known causes <u>33,900</u>
d. Unknown causes0
2. Total CMS downtime33,900
3. [Total CMS Downtime] x (100) / [Total source operating time]
3. [Total CMS Downtime] x (100) / [Total source operating time]

Date	Event
/20/2012	CAM triggered by 5% opacity for 5 consecutive 6-minute periods.
2/7/2012	Opacity exceeds 10% during three (3) 6-minute periods
	Opacity exceeds 10% during one (1) 6-minute periods
2/8/2012	Maintenance activities begin while kiln is operating. Main Baghouse compartments are closed and opened in attempt to locate one causing most opacity problems
	Daily Average Opacity 10.52% / Daily Average DP 10.40" w.c. Closing compartments is not helping opacity so kiln is turned off for extended outage
2/13/2012	Introduce ultraviolet leak detection powder into baghouse to detect leaks in bags
2/14/2012	Continue detecting leaks in bags
2/15/2012	Complete detecting leaks in bags
3/22/2012	Begin changing out bad bags
4/2/2012	End changing bad bags
4/3/2012 4/4/2012	Kiln start-up Perform opacity test of baghouse to determine compartment / rows with high opacity
4/5/2012	Install finish mill balls in venturi to seal bad bags, Compartment #5
4/6/2012	Install finish mill balls in venturi to seal bad bags, Compartment #6
4/7/2012	Install finish mill balls in venturi to seal bad bags, Compartment #2
4/10/2012	Ultraviolet leak check of Compartment #5 and 6
4/11/2012	Change out bad bags in Compartment #6
4/40/0040	Ultraviolet leak check of Compartment #2
4/12/2012	Change out bad bags in Compartment #2
4/15/2012	24 Minutes Opacity >10%, compressed air pressure low
4/17/2012	Ultraviolet leak check of Compartment #3
4/20/2012	Daily Average Opacity 5.04% / Daily Average DP 7.74" w.c.
4/21/2012	Daily Average Opacity 4.93% / Daily Average DP 7.64" w.c.
4/22/2012	Daily Average Opacity 5.18% / Daily Average DP 7.79" w.c.
4/27/2012	Perform opacity test of baghouse to determine compartment / rows with high opacity
4/30/2012	Ultraviolet leak check of Compartment #5
5/1/2012	Kiln turned off for short outage
JI 1140 14	Begin change out bad bags in Compartment #5
5/3/2012	End changing bad bags in Compartment #5
5/5/2012	Kiln start-up begins 10 pm
5/6/2012	Kiln start-up continues
	Daily Average Opacity 0.53% / Daily Average DP 9.94" w.c.

T	
5/14/2012	Perform opacity test of baghouse to determine compartment / rows with high opacity
5/23/2012	54 Minutes Opacity >10%, Compartment #4 closed for bad bag determination, then reopened
5/24/2012	Compartment #4 closed to cool for bad bag change-out
0/2 1/20 12	66 Minutes Opacity >10% while compartment closed
5/27/2012	Daily Average Opacity 3.87% / Daily Average DP 7.84" w.c.
5/28/2012	Daily Average Opacity 5.51% / Daily Average DP 8.34" w.c.
5/30/2012	30 Minutes Opacity >10% / Daily Average Opacity 6.60% / Daily Average DP 8.10" w.c.
6/2/2012	162 Minutes Opacity >10% (Compartment #4 Closed)
6/3/2012	336 Minutes Opacity >10% (Compartment #4 Closed)
	Daily Average Opacity 6.59% / Daily Average DP 7.80" w.c.
	30 Minutes Opacity >10% (Compartment #4 Closed)
6/4/2012	Change out bad bags in Compartment #4
	Open Compartment #4
6/5/2012	6 Minutes Opacity >10% Perform opacity test of baghouse to determine compartment / rows with high opacity
6/6/2012	12 Minutes Opacity >10%
6/7/2012	12 Minutes Opacity >10%
6/9/2012	24 Minutes Opacity >10%
6/10/2012	6 Minutes Opacity >10%
6/11/2012	6 Minutes Opacity >10%
6/12/2012	18 Minutes Opacity >10%
6/14/2012	Change out bad bags in Compartment #5 with compartment closed
0/14/2012	6 Minutes Opacity >10% while compartment closed
6/15/2012	Change out bad bags in Compartment #6 with compartment closed
. IVIZUIZ	6 Minutes Opacity >10% while compartment closed
6/19/2012	Perform opacity test of baghouse to determine compartment / rows with high opacity
6/24/2012	6 Minutes Opacity >10%
6/25/2012	6 Minutes Opacity >10%
0,20,20,12	Kiln turned off for extended outage