

KOOGLER & ASSOCIATES, INC.
ENVIRONMENTAL SERVICES
4014 NW 13th STREET
GAINESVILLE, FL 32609-1923
www.kooglerassociates.com
352/377-5822 ■ FAX/377-5822

via email only

Jeff Koerner, Administrator
Air Permitting and Compliance Program
Division of Air Resource Management
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399
Jeff.koerner@dep.state.fl.us

**RE: American Cement Company, LLC
Sumterville Cement Plant, Facility ID: 1190042
Request for Time Extension for Compliance to NESHAP LLL**

Dear Mr. Koerner,

American Cement Company, LLC (ACC) owns and operates the Sumterville Cement Plant (Facility ID No. 1190042, Title V permit 1190042-010-AV) located in Sumterville, Florida. ACC submits this request for an extension of the date of compliance for its cement plant with certain requirements of the Portland Cement NESHAP. The request is pursuant to the requirements of 40 CFR 63.6(i)(4), as adopted by reference at 62-204.800(d) F.A.C. and under the authority of 42 USC 7412(i)(3)(B) and 40 CFR Part 63, Subpart LLL (PCMACT).

The reasons for this request are pollutant specific. Following, each pollutant will be discussed separately and included in the discussion will be the necessary justification for each request, as specified in the PCMACT.

Satisfaction of 40 CFR 63.6(i)

The provisions of 40 CFR 63.6(i)(6)(i) require that a request for an extension of the compliance date include the following information.

The request for a compliance extension under paragraph (i)(4) of this section shall include the following information:

(A) A description of the controls to be installed to comply with the standard;

(B) A compliance schedule, including the date by which each step toward compliance will be reached. At a minimum, the list of dates shall include:

(1) The date by which on-site construction, installation of emission control equipment, or a process change is planned to be initiated; and

(2) The date by which final compliance is to be achieved.

(3) The date by which on-site construction, installation of emission control equipment, or a process change is to be completed; and

(4) The date by which final compliance is to be achieved.

As previously stated, ACC will address each of the PCMACT pollutants in the context of 40 CFR 63.6(i).

Facility Background

The Sumterville Cement Plant began operation in 2010 and is the most recent of Florida precalciner/preheater cement kiln systems. For purposes of the PCMACT, the ACC kiln system has been determined to be a new kiln system under the 2006 version of the PCMACT and is addressed accordingly in the Title V permit. As such, the plant continues to comply with the very stringent PCMACT standards of the 2006 PCMACT. The kiln however, will be an existing kiln system under the 2010 revision of the PCMACT.

The plant consists of a dry process Portland cement process kiln with a preheater and calciner. Additionally the facility includes a limestone mine and several other emission units associated with a cement manufacturing facility. Overall, the manufacture of Portland cement involves the crushing, grinding, and blending of limestone, clays, and other raw materials into a chemically proportioned mixture which is heated in a rotary kiln to high temperature to produce clinker nodules. The clinker is cooled and ground with a small quantity of gypsum and/or other additives to produce finished cement.

The main emission unit of concern for this request is the kiln system; EU003 – Pyroprocessing System. Extension requests are being made for hydrogen chloride (HCl) and mercury (Hg) emitted from this kiln system. ACC has been, and continues to prepare for compliance to the PCMACT and has procured, and either installed or in the process of installing, the monitoring equipment for PCMACT pollutants Hg and HCl. ACC continues to operate a THC CEMS that will demonstrate PCMACT compliance.

Hydrogen Chloride

Per 40 CFR 63.1350(l), if a cement plant is subject to a limitation on HCl emissions, compliance shall be demonstrated out either by using an HCl CEMS or using a wet/dry scrubber/tray tower to control emissions and parametrically monitoring SO₂ emissions or scrubber parameters continuously. As such, in preparation for the PCMACT, ACC procured a correlation filter based HCl CEMS to demonstrate compliance with the HCl emission standards. ACC presumed when it procured the CEMS that EPA would finalize the required Performance Specification 18 (PS 18) and the associated Appendix F, Procedure 6 necessary to demonstrate initial certification for this type of HCl CEMS. For the PCMACT, this CEMS can only be certified using Performance Specification 18. However, EPA has yet to finalize this Performance Specification. Therefore, ACC is

currently unable to certify their HCl CEMS and demonstrate compliance with the HCl emission standard. In addition to the Performance Specification 18 delay, there are currently no "National Institute of Standards and Technology (NIST) traceable" low concentration HCl calibration gases commercially available. Until these gases are commercially available, ACC will not be able to carry out the CEMS certification described above. For this reason ACC is not able to provide a firm date for compliance. We will however, inform you as to when the necessary "NIST traceable" calibration gases are made available and we are able to comply.

This matter has been discussed recently by PCA with EPA OAQPS at which time EPA concurred that the calibration issue is sufficient cause to make a compliance extension request. This recent opinion was reached a few days before the normal 120 day deadline prior to the PCMACT implementation date of September 9, 2015. Given the recent opinion by EPA, the timing of this request after the 120 day deadline, provides explanation to address 40 CFR 63.6(i)(4)(i)(C).

Due to these circumstances, ACC is requesting that the compliance date for the PCMACT HCl requirements be extended to September 9, 2016. This extension will allow ACC to review and develop a monitoring plan and plan for the initial certification to ensure compliant CEMS monitoring with the PCMACT HCl standards.

(A) A description of the controls to be installed to comply with the standard;

As noted above, ACC has already installed the necessary equipment to demonstrate compliance. No additional equipment is needed for ACC to comply with the new HCl standard.

(B) A compliance schedule, including the date by which each step toward compliance will be reached. At a minimum, the list of dates shall include:

(1) The date by which on-site construction, installation of emission control equipment, or a process change is planned to be initiated; and

(2) The date by which final compliance is to be achieved.

(3) The date by which on-site construction, installation of emission control equipment, or a process change is to be completed; and

(4) The date by which final compliance is to be achieved.

Table 3 provides the compliance schedule required for (B) above.

Table 3 - Schedule for Compliance to HCl NESHAP Limit

| Key Milestones for Hydrochloric Acid | Target Completion Dates |
|---|-------------------------|
| Finalization of PS 18 & commercially available NIST calibration gases | unknown |
| Completion of initial HCl RATA | 8/9/2016 |
| Optimization of Monitoring Equipment | 8/9/2016 |
| Compliance Date | 9/9/2016 |

Mercury

The 2010 PCMACT emission limitation for mercury for ACC is 55 pounds per million tons of clinker produced. At this time, ACC material balance data (used for compliance) and reasonable assurance data from an Hg CEMS suggest the ACC will be near the standard. As such ACC continues to search for alternative low Hg materials and to investigate dust shuttling. However, there is trouble with the mercury calibrator for Hg continuous emission monitoring. To date, NIST has not approved the required certification of the Hg CEMS calibrator. This issue is not a result of methods or practices of ACC, but internal to NIST over which ACC has no control. As such, depending on the timeline within NIST, the calibration equipment needed for the Hg CEMS may not be available in time to adequately validate the Hg CEMS prior to September 9, 2015.

Due to these circumstances, ACC is requesting that the compliance date for the PCMACT Hg requirements be extended to September 9, 2016. Without the ability to accurately operate this CEMS, ACC cannot implement the control measures for mercury using the CEMS in accordance with the terms of the regulations. This matter has also been discussed recently by PCA with EPA OAQPS at which time EPA concurred that the calibration issue is sufficient cause to make this extension request. This recent opinion was given a few days before the normal 120 day deadline prior to the implementation date of September 9, 2015. Given the recent opinion by EPA, the timing of this request after the 120 day deadline, provides the explanation to address 40 CFR 63.6(i)(4)(i)(C).

(A) A description of the controls to be installed to comply with the standard;

The proper controls for mercury are already in place. This request is strictly due to a delay in the calibration equipment verification by NIST.

(B) A compliance schedule, including the date by which each step toward compliance will be reached. At a minimum, the list of dates shall include:

(1) The date by which on-site construction, installation of emission control equipment, or a process change is planned to be initiated; and

(2) The date by which final compliance is to be achieved.

(3) The date by which on-site construction, installation of emission control equipment, or a process change is to be completed; and

(4) The date by which final compliance is to be achieved.

Table 4 provides the compliance schedule required for (B).

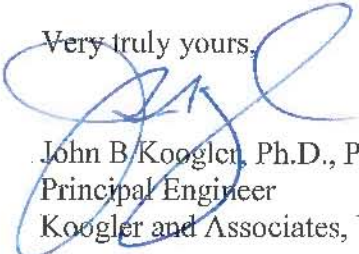
Table 4 - Schedule for Compliance to Hg NESHAP Limit

| Key Milestones for Mercury | Target Completion Dates |
|--|-------------------------|
| NIST Certification Received | unknown |
| Initiate Calibration and Optimization of Equipment | 8/9/2016 |
| Compliance Date | 9/9/2016 |

The circumstances which are beyond the control of ACC have been communicated to EPA personnel on several occasions in both comments on draft rule revisions and during meetings of EPA Office of Air and Radiation (OAR) officials and representatives of the Portland Cement Association. The problems were discussed extensively with the EPA staff that is responsible for the Portland Cement NESHAP on May 7, 2015, during a meeting with PCA at the EPA offices in Research Triangle Park. In that meeting, EPA personnel urged companies to file for a compliance date extension, as a means to avoid non-compliance due to this situation. That is the explicit purpose of this letter.

Thank you for your consideration of this matter. We look forward to working with you and your staff on this request.

Very truly yours,



John B. Koogler, Ph.D., P.E.
Principal Engineer
Koogler and Associates, Inc.

Copy: Cary Cohrs, ACC, ccohrs@americancementcompany.com
Charles Robertson, ACC, crobertson@americancementcompany.com