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April 16, 2015
Via email only

Alvaro A. Linero, P.E.
Alvaro.Linero@dep.state.fl.us
Florida Department of Environmental Protection
Division of Air Resource Management
Office of Permitting and Compliance
2600 Blair Stone Road, MS 5500
Tallahassee, Florida 32399-2400

Subject: Air Construction Permit, COMS/CPMS Temporary Replacement
Suwannee American Cement - Branford Plant, Facility AIRS ID 1210465

Dear Mr. Linero:

On behalf of Suwannee American Cement, LLC (SAC), Koogler and Associates, Inc. (Koogler) is submitting this air construction permit application to remove the COMS monitor on SAC's main stack and clinker cooler stack. These monitors have historically been run as a surrogate continuous monitor for particulate matter from these individual stacks. However, as is required in the upcoming NESHAP, a CPMS (a continuous particulate matter monitor) will be installed on each of these stacks. As such, the necessity of maintaining the COMS is obsolete for purposes of NESHAP and the removal of these monitors is requested with consideration of changes to the initial BACT for the facility where opacity was applied as a "best available" surrogate for the NAAQS pollutant, particulate matter. Clearly, the use of a CPMS will provide a more accurate assessment of PM emissions and provide greater environmental benefits. Even though the CPMS data will be averaged for a 30-kiln operating day interval per the NESHAP, shorter term emissions information will continue to be monitored and available per the recordkeeping requirements of the Title V permit. SAC foresees no change in operations and thus the current excellent record of continued opacity compliance should continue though out the next several months during the exchange from opacity to CPMS monitoring. A critical aspect of our request is to allow the sequenced change out of opacity monitor removal with exchange in the same porthole location of the CPMS. As such, there will be a short period of time to exchange the monitors when compliance assurance will need to be at the discretion of the Department for which SAC respectfully requests guidance. SAC has proposed in the attached application a method of compliance assurance in this interim period but is certainly willing and wanting to work with the Department to assure compliance.

Enclosed with this letter are the Department's application forms and a corresponding appendix describing the project in more detail. If you have any questions regarding this submittal, please contact

me at (352) 377-5822 or mlee@kooglerssociates.com. I look forward to working with you and your staff on this project.

Best regards,

Sincerely,

A handwritten signature in black ink, appearing to be 'ML', written in a cursive style.

Max Lee, Ph.D., P.E.
Koogler and Associates, Inc.

Cc: David Read, FDEP (David.read@dep.state.fl.us)
John Phillips, FDEP (John.D.Phillips@dep.state.fl.us)
Tom Messer, SAC (tomm@vcsmc.com)
Krishna Cole, SAC (krishnac@suwanneecement.com)

Enc: Application

AIR CONSTRUCTION PERMIT APPLICATION

SUWANNEE AMERICAN CEMENT, LLC

FACILITY ID: 1210465



PREPARED FOR:

Suwannee American Cement, LLC
Branford Cement Plant
5117 US Highway 27
Branford, FL 32008

PREPARED BY:

Koogler and Associates, Inc.
4014 NW 13th St.
Gainesville, FL 32609

Submission Date: April 16, 2015



Department of Environmental Protection

Division of Air Resource Management

APPLICATION FOR AIR PERMIT - LONG FORM

I. APPLICATION INFORMATION

Air Construction Permit – Use this form to apply for an air construction permit:

- For any required purpose at a facility operating under a federally enforceable state air operation permit (FESOP) or Title V air operation permit;
- For a proposed project subject to prevention of significant deterioration (PSD) review, nonattainment new source review, or maximum achievable control technology (MACT);
- To assume a restriction on the potential emissions of one or more pollutants to escape a requirement such as PSD review, nonattainment new source review, MACT, or Title V; or
- To establish, revise, or renew a plantwide applicability limit (PAL).

Air Operation Permit – Use this form to apply for:

- An initial federally enforceable state air operation permit (FESOP); or
- An initial, revised, or renewal Title V air operation permit.

To ensure accuracy, please see form instructions.

Identification of Facility

1. Facility Owner/Company Name: Suwannee American Cement, LLC	
2. Site Name: Branford Cement Plant	
3. Facility Identification Number: 1210465	
4. Facility Location... Street Address or Other Locator: 5117 US Highway 27 City: Branford County: Suwannee Zip Code: 32008-2463	
5. Relocatable Facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6. Existing Title V Permitted Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

Application Contact

1. Application Contact Name: Max Lee, Ph.D, P.E.	
2. Application Contact Mailing Address... Organization/Firm: Koogler and Associates, Inc Street Address: 4014 NW 13th Street City: Gainesville State: Florida Zip Code: 32609	
3. Application Contact Telephone Numbers... Telephone: (352) 377 - 5822 ext. 13 Fax: (352) 377 - 7158	
4. Application Contact E-mail Address: mlee@kooglerassociates.com	

Application Processing Information (DEP Use)

1. Date of Receipt of Application:	3. PSD Number (if applicable):
2. Project Number(s):	4. Siting Number (if applicable):

Purpose of Application

This application for air permit is being submitted to obtain: (Check one)

Air Construction Permit

- Air construction permit.
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL).
- Air construction permit to establish, revise, or renew a plantwide applicability limit (PAL), and separate air construction permit to authorize construction or modification of one or more emissions units covered by the PAL.

Air Operation Permit

- Initial Title V air operation permit.
- Title V air operation permit revision.
- Title V air operation permit renewal.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is required.
- Initial federally enforceable state air operation permit (FESOP) where professional engineer (PE) certification is not required.

**Air Construction Permit and Revised/Renewal Title V Air Operation Permit
(Concurrent Processing)**

- Air construction permit and Title V permit revision, incorporating the proposed project.
- Air construction permit and Title V permit renewal, incorporating the proposed project.

Note: By checking one of the above two boxes, you, the applicant, are requesting concurrent processing pursuant to Rule 62-213.405, F.A.C. In such case, you must also check the following box:

- I hereby request that the department waive the processing time requirements of the air construction permit to accommodate the processing time frames of the Title V air operation permit.

Application Comment

This application is to request the replacement of the exiting COMS, which monitors opacity as a surrogate for PM emissions, with a CPMS, which continuously monitors the PM emissions from the SAC main stack (EU004) and clinker cooler (EU005).

Scope of Application

Emissions Unit ID Number	Description of Emissions Unit	Air Permit Type	Air Permit Proc. Fee
004	In line kiln/raw mill controlled by baghouse – main stack	AV	
005	Clinker cooler controlled by baghouse – main stack	AV	

Application Processing Fee

Check one: Attached - Amount: \$_____ Not Applicable


Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Mr. Tom Messer, Plant Manager
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Suwannee American Cement, LLC Street Address: 5117 US Hwy 27 City: Branford State: Florida Zip Code: 32008
3. Owner/Authorized Representative Telephone Numbers... Telephone: (386) 935 -5000 Fax: (386) 935 -5080
4. Owner/Authorized Representative E-mail Address: tomm@suwanneecement.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i> <hr/> Signature <hr/>Date

Owner/Authorized Representative Statement

Complete if applying for an air construction permit or an initial FESOP.

1. Owner/Authorized Representative Name : Mr. Tom Messer, Plant Manager
2. Owner/Authorized Representative Mailing Address... Organization/Firm: Suwannee American Cement, LLC Street Address: 5117 US Hwy 27 City: Branford State: Florida Zip Code: 32008
3. Owner/Authorized Representative Telephone Numbers... Telephone: (386) 935 -5000 Fax: (386) 935 -5080
4. Owner/Authorized Representative E-mail Address: tomm@suwanneecement.com
5. Owner/Authorized Representative Statement: <i>I, the undersigned, am the owner or authorized representative of the corporation, partnership, or other legal entity submitting this air permit application. To the best of my knowledge, the statements made in this application are true, accurate and complete, and any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department.</i>  Signature _____ 4.16.2015 Date _____

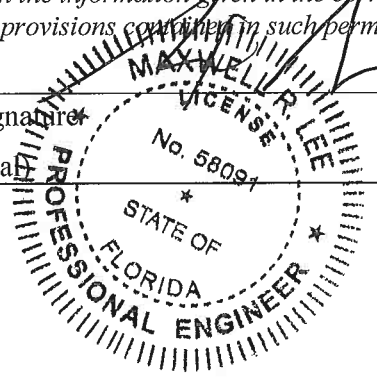
Application Responsible Official Certification

Complete if applying for an initial, revised, or renewal Title V air operation permit or concurrent processing of an air construction permit and revised or renewal Title V air operation permit. If there are multiple responsible officials, the “application responsible official” need not be the “primary responsible official.”

1. Application Responsible Official Name:
2. Application Responsible Official Qualification (Check one or more of the following options, as applicable): <input type="checkbox"/> For a corporation, the president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit under Chapter 62-213, F.A.C. <input type="checkbox"/> For a partnership or sole proprietorship, a general partner or the proprietor, respectively. <input type="checkbox"/> For a municipality, county, state, federal, or other public agency, either a principal executive officer or ranking elected official. <input type="checkbox"/> The designated representative at an Acid Rain source, CAIR source, or Hg Budget source.
3. Application Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
4. Application Responsible Official Telephone Numbers... Telephone: ext. Fax:
5. Application Responsible Official E-mail Address:
6. Application Responsible Official Certification: <i>I, the undersigned, am a responsible official of the Title V source addressed in this air permit application. I hereby certify, based on information and belief formed after reasonable inquiry, that the statements made in this application are true, accurate and complete and that, to the best of my knowledge, any estimates of emissions reported in this application are based upon reasonable techniques for calculating emissions. The air pollutant emissions units and air pollution control equipment described in this application will be operated and maintained so as to comply with all applicable standards for control of air pollutant emissions found in the statutes of the State of Florida and rules of the Department of Environmental Protection and revisions thereof and all other applicable requirements identified in this application to which the Title V source is subject. I understand that a permit, if granted by the department, cannot be transferred without authorization from the department, and I will promptly notify the department upon sale or legal transfer of the facility or any permitted emissions unit. Finally, I certify that the facility and each emissions unit are in compliance with all applicable requirements to which they are subject, except as identified in compliance plan(s) submitted with this application.</i> _____ Signature _____ Date

Professional Engineer Certification

1. Professional Engineer Name: Max Lee, Ph.D. P.E. Registration Number: 58091
2. Professional Engineer Mailing Address... Organization/Firm: Koogler and Associates, Inc. Street Address: 4014 NW 13th Street City: Gainesville State: Florida Zip Code: 32609
3. Professional Engineer Telephone Numbers... Telephone: (352) 377-5822 ext.13 Fax: (352) 377-7158
4. Professional Engineer E-mail Address: mlee@kooglerassociates.com
5. Professional Engineer Statement: <i>I, the undersigned, hereby certify, except as particularly noted herein*, that:</i> <i>(1) To the best of my knowledge, there is reasonable assurance that the air pollutant emissions unit(s) and the air pollution control equipment described in this application for air permit, when properly operated and maintained, will comply with all applicable standards for control of air pollutant emissions found in the Florida Statutes and rules of the Department of Environmental Protection; and</i> <i>(2) To the best of my knowledge, any emission estimates reported or relied on in this application are true, accurate, and complete and are either based upon reasonable techniques available for calculating emissions or, for emission estimates of hazardous air pollutants not regulated for an emissions unit addressed in this application, based solely upon the materials, information and calculations submitted with this application.</i> <i>(3) If the purpose of this application is to obtain a Title V air operation permit (check here <input checked="" type="checkbox"/>, if so), I further certify that each emissions unit described in this application for air permit, when properly operated and maintained, will comply with the applicable requirements identified in this application to which the unit is subject, except those emissions units for which a compliance plan and schedule is submitted with this application.</i> <i>(4) If the purpose of this application is to obtain an air construction permit (check here <input type="checkbox"/>, if so) or concurrently process and obtain an air construction permit and a Title V air operation permit revision or renewal for one or more proposed new or modified emissions units (check here <input type="checkbox"/>, if so), I further certify that the engineering features of each such emissions unit described in this application have been designed or examined by me or individuals under my direct supervision and found to be in conformity with sound engineering principles applicable to the control of emissions of the air pollutants characterized in this application.</i> <i>(5) If the purpose of this application is to obtain an initial air operation permit or operation permit revision or renewal for one or more newly constructed or modified emissions units (check here <input checked="" type="checkbox"/>, if so), I further certify that, with the exception of any changes detailed as part of this application, each such emissions unit has been constructed or modified in substantial accordance with the information given in the corresponding application for air construction permit and with all provisions contained in such permit.</i> Signature: _____ Date: <u>4/16/15</u> (seal)



II. FACILITY INFORMATION

A. GENERAL FACILITY INFORMATION

Facility Location and Type

1. Facility UTM Coordinates... Zone 17 321.4 East (km) 3315.9 North (km)		2. Facility Latitude/Longitude... Latitude (DD/MM/SS) 29°57'45" Longitude (DD/MM/SS) 82°51'03"	
3. Governmental Facility Code: 0	4. Facility Status Code: A	5. Facility Major Group SIC Code: 32	6. Facility SIC(s): 3241
7. Facility Comment : None			

Facility Contact

1. Facility Contact Name: Krishna C. Cole - Environmental Engineer
2. Facility Contact Mailing Address... Organization/Firm: Suwannee American Cement, LLC Street Address: 5117 US HWY 27 City: Branford State: Florida Zip Code: 32008
3. Facility Contact Telephone Numbers: Telephone: 386-935-5023 Fax: 386-935-5080
4. Facility Contact E-mail Address: krishnac@suwanneecement.com

Facility Primary Responsible Official

Complete if an "application responsible official" is identified in Section I that is not the facility "primary responsible official."

1. Facility Primary Responsible Official Name:
2. Facility Primary Responsible Official Mailing Address... Organization/Firm: Street Address: City: State: Zip Code:
3. Facility Primary Responsible Official Telephone Numbers... Telephone: () - ext. Fax: () -
4. Facility Primary Responsible Official E-mail Address:

Facility Regulatory Classifications

Check all that would apply *following* completion of all projects and implementation of all other changes proposed in this application for air permit. Refer to instructions to distinguish between a “major source” and a “synthetic minor source.”

1. <input type="checkbox"/> Small Business Stationary Source	<input type="checkbox"/> Unknown
2. <input type="checkbox"/> Synthetic Non-Title V Source	
3. <input checked="" type="checkbox"/> Title V Source	
4. <input checked="" type="checkbox"/> Major Source of Air Pollutants, Other than Hazardous Air Pollutants (HAPs)	
5. <input type="checkbox"/> Synthetic Minor Source of Air Pollutants, Other than HAPs	
6. <input checked="" type="checkbox"/> Major Source of Hazardous Air Pollutants (HAPs)	
7. <input type="checkbox"/> Synthetic Minor Source of HAPs	
8. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NSPS (40 CFR Part 60)	
9. <input type="checkbox"/> One or More Emissions Units Subject to Emission Guidelines (40 CFR Part 60)	
10. <input checked="" type="checkbox"/> One or More Emissions Units Subject to NESHAP (40 CFR Part 61 or Part 63)	
11. <input type="checkbox"/> Title V Source Solely by EPA Designation (40 CFR 70.3(a)(5))	
12. Facility Regulatory Classifications Comment: Facility is subject to applicable portions of: 40 CFR 51, 52, 70, 71 – GHG Tailoring Rule 40 CFR 63 Subpart LLL 40 CFR 60 Subpart F (superseded by NESHAP Subpart LLL) 40 CFR 60 Subpart Y 40 CFR 60 Subpart OOO 40 CFR 241 40 CFR 63 Subpart ZZZZ and 40 CFR 60 Subpart IIII as applicable. Rules 62-4 through 62-297, F.A.C. ; specifically 62-297.407, F.A.C. for cement plants	

List of Pollutants Emitted by Facility

1. Pollutant Emitted	2. Pollutant Classification	3. Emissions Cap [Y or N]?
PM	A	N
PM₁₀	A	N
SO₂	A	N
NO_x	A	N
CO	A	N
HAPS	A	N
VOC	B	N
DIOX	B	N
H114	B	N

B. EMISSIONS CAPS

Facility-Wide or Multi-Unit Emissions Caps

1. Pollutant Subject to Emissions Cap	2. Facility-Wide Cap [Y or N]? (all units)	3. Emissions Unit ID's Under Cap (if not all units)	4. Hourly Cap (lb/hr)	5. Annual Cap (ton/yr)	6. Basis for Emissions Cap
N/A					

7. Facility-Wide or Multi-Unit Emissions Cap Comment:

C. FACILITY ADDITIONAL INFORMATION

Additional Requirements for All Applications, Except as Otherwise Stated

1. Facility Plot Plan: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>8/29/2014</u>
2. Process Flow Diagram(s): (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>8/29/2014</u>
3. Precautions to Prevent Emissions of Unconfined Particulate Matter: (Required for all permit applications, except Title V air operation permit revision applications if this information was submitted to the department within the previous five years and would not be altered as a result of the revision being sought) <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Previously Submitted, Date: <u>8/29/2014</u>

Additional Requirements for Air Construction Permit Applications

1. Area Map Showing Facility Location: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
2. Description of Proposed Construction, Modification, or Plantwide Applicability Limit (PAL): <input checked="" type="checkbox"/> Attached, Document ID: <u>Appendix</u> <input type="checkbox"/> Not Applicable (existing permitted facility)
3. Rule Applicability Analysis: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable (existing permitted facility)
4. List of Exempt Emissions Units: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
5. Fugitive Emissions Identification: <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
6. Air Quality Analysis (Rule 62-212.400(7), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
7. Source Impact Analysis (Rule 62-212.400(5), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
8. Air Quality Impact since 1977 (Rule 62-212.400(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
9. Additional Impact Analyses (Rules 62-212.400(8) and 62-212.500(4)(e), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable
10. Alternative Analysis Requirement (Rule 62-212.500(4)(g), F.A.C.): <input type="checkbox"/> Attached, Document ID: _____ <input checked="" type="checkbox"/> Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for FESOP Applications

1. List of Exempt Emissions Units:

Attached, Document ID: _____ Not Applicable

Additional Requirements for Title V Air Operation Permit Applications

1. List of Insignificant Activities: (Required for initial/renewal applications only)

Attached, Document ID: _____ Not Applicable

2. Identification of Applicable Requirements: (Required for initial/renewal applications, and for revision applications if this information would be changed as a result of the revision being sought)

Attached, Document ID: _____

Not Applicable (revision application with no change in applicable requirements)

3. Compliance Report and Plan: (Required for all initial/revision/renewal applications)

Attached, Document ID: **Appendix**

Note: A compliance plan must be submitted for each emissions unit that is not in compliance with all applicable requirements at the time of application and/or at any time during application processing. The department must be notified of any changes in compliance status during application processing.

4. List of Equipment/Activities Regulated under Title VI: (If applicable, required for initial/renewal applications only)

Attached, Document ID: _____

Equipment/Activities Onsite but Not Required to be Individually Listed

Not Applicable

5. Verification of Risk Management Plan Submission to EPA: (If applicable, required for initial/renewal applications only)

Attached, Document ID: _____ Not Applicable

6. Requested Changes to Current Title V Air Operation Permit:

Attached, Document ID: **Appendix** Not Applicable

C. FACILITY ADDITIONAL INFORMATION (CONTINUED)

Additional Requirements for Facilities Subject to Acid Rain, CAIR, or Hg Budget Program

1. Acid Rain Program Forms:

Acid Rain Part Application (DEP Form No. 62-210.900(1)(a)):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable (not an Acid Rain source)

Phase II NO_x Averaging Plan (DEP Form No. 62-210.900(1)(a)1.):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable

New Unit Exemption (DEP Form No. 62-210.900(1)(a)2.):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable

2. CAIR Part (DEP Form No. 62-210.900(1)(b)):

Attached, Document ID: _____ Previously Submitted, Date: _____

Not Applicable (not a CAIR source)

Additional Requirements Comment

The Compliance plan is for an alternative method of compliance and describes said method. The facility is not currently out of compliance, nor do they expect to be out of compliance at any point in the future.

Appendix

Suwannee American Cement, LLC
Facility ID: 1210465
Air Construction Permit Application for
Replacement of COMS on EU004 and EU005

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EXECUTIVE SUMMARY

Suwannee American Cement, LLC (SAC) owns and operates a cement plant located in Branford, Florida, designated as the Branford Cement Plant. The cement plant consists of one dry-process kiln with preheater, precalciner, and clinker cooler permitted to produce 965,425 tons per year (TPY) of clinker. The cement produced by SAC is typically distributed to ready-mix facilities within 100 miles of the facility and is used in many different construction projects throughout North Florida. SAC's cement is locally produced and locally consumed. The Florida Department of Environmental Protection (DEP) issued the initial air construction permit for the SAC dry-process cement kiln in 2000 and the facility began operation in 2003. Its current Title V permit is 1210465-019-AV.

This construction permit application requests removal of the Continuous Opacity Monitoring Systems (COMS) on SAC's main stack (EU004), which is controlled by a reverse jet bag house (bag house), and on the clinker cooler stack (EU005), which is controlled by an electrostatic precipitator (ESP). These COMS units will be replaced with a Continuous Particulate Monitoring Systems (CPMS) in preparation for compliance with new emission standards and requirements. The COMS have historically been run as a surrogate continuous monitor for particulate matter from these individual stacks. However, as is required in the upcoming NESHAP (40 CFR 63.1350 (b)), a CPMS will be installed on each of these stacks. As such, SAC is requesting to remove the COMS and replace them with the CPMS. During the interim period, SAC proposes to conduct a daily Method 22 for each affected emission unit with a Method 9 conducted if emissions are observed, per 40 CFR 63.1350(f)(1)(iv). The CPMS will be operational, in accordance to Subpart LLL in the time allotted by that rule or subsequent opacity monitoring will be in accordance with the requirements of 40 CFR 63.1350 (f)(1)(i) through (vii).

TEMPORARY REPLACEMENT OF COMS ON EU004 AND EU005

The current Title-V permit, which is in the process of renewal, is 1210465-019-AV. Currently the facility is allowed to emit up to 10% opacity, based on a 6 minute block averaging period. This averaging period is computed from a minimum of one measurement every 15 seconds and has a basis associated with Best Available Control Technology (BACT) for construction of the kiln and the existing NESHAP Subpart LLL. To that end, SAC is requesting that through the proposed attached Compliance Plan, the Department will amend the PSD permit under 1210465-001-AC to allow the proposed compliance plan and subsequent CPMS monitoring to suffice as PM BACT for the kiln and clinker cooler.

Historically, COMS have been installed at facilities in lieu of daily Method 22 and Method 9 (if needed) monitoring programs for ease of operation and assurance of compliance with opacity standards. The NESHAP Subpart LLL has expressly given the option for compliance on finish mills by either COMs or daily Method 22 tests. In lieu of CPMS, these continuous opacity monitoring systems (COMS) have traditionally been used as a surrogate for continuous particulate matter emissions with additional annual stack testing also being carried out to ensure compliance with particulate matter (PM) limits. However, as required by the recent NESHAP LLL revisions, which go into effect on September 9th of this year, SAC will be required to comply with new PM emission limits that are significantly lower than existing limits and begin continuously monitoring PM emissions. The calculated existing limits, new limits, and percent limit reduction is displayed in the table below:

TABLE 1: SAC CURRENT PM LIMITS VERSUS NEW PM LIMITS

Pollutant	Units	Current Limit	New Limit	% Limit Reduction	Historic Test Average Result
Main Stack PM	lb/ton clinker	0.1925	0.07	63	0.039
Cooler Stack PM	lb/ton clinker	0.105	0.07	33	0.017

Table 1: Existing PM limits versus new PM limits for the main stack and cooler stack.

Table 1 above shows, based on the historical stack test averages, that SAC has little concern about complying with the new NESHAP PM standards. Since operations began in 2003, SAC has always operated well below its opacity and PM limits and SAC expects to be able to comply with the new limits through vigilant monitoring and increases in the frequency of bag replacement on the main stack. SAC also anticipates that compliance on the cooler stack controlled by ESP can be achieved with vigilant monitoring and best maintenance practices.

Per rule 40 CFR 63.1343 Table 1 and 63.1350 (b), SAC will be required to install CPMS on both the main stack (EU004) and the clinker cooler stack (EU005). The existing COMS monitors that are currently installed at both of these stacks are over 12 years old and are no longer being produced or serviced by the manufacturer (Sick Maihak). As such they are becoming obsolete. To support the transition, SAC is submitting this AC permit to request the replacement of the COMS with the CPMS monitors by replacing into the existing porthole location of the COMS with the CPMS. This exchange will cause a short period of time in which the opacity monitoring by COMS will not be conducted.

To assure compliance to the Department, SAC is proposing a compliance plan for an alternative method of compliance to conduct daily Method 22 tests and additional Method 9 tests, if emissions are observed, during the interim period to ensure continued compliance with the Title V permit opacity limit. SAC will also ensure, through installation of the PM monitors prior to September 9th, 2015, that compliance with the Subpart LLL will be met. Once the CPMS is installed and operational, SAC proposes to assure compliance to the Title V permit limit for opacity using CPMS data as a surrogate for opacity compliance through a Title V compliance plan (Table 2 below). More specifically, from the day beginning when SAC conducts Method 5 testing to set an “interim” operating limit, the CPMS data will begin to build a multi-day interim operating limit. The multi-day interim operation limit will grow each day until it includes 30 operating days and from that day forward rolls daily per the procedures for determining the CPMS operation limit in the NESHAP LLL (30 day rolling average). While the interim rolling average includes less than 30 kiln operating days, SAC commits to use the CPMS operation limit as a measure for compliance to the opacity limit instead of daily Method 22/9 tests. Until the data from the CPMS includes 30 kiln operating days, SAC will commit to re-start daily Method 22/9 if the CPMS data collected indicates a value above the interim operation limit.

Once the CPMS data includes 30 valid kiln operating days of data, the interim operation limit will be used to determine compliance to the current Title V permit PM limits (see Table 1 above) in accordance with 40 CFR 63.1349(b)(1)(i) through (vi) requirements. If the 30 day rolling average CPMS readings go above the operation limit, SAC will conduct a subsequent Method 5 stack test to demonstrate compliance within 45 days after the CPMS high readings. This demonstration will allow SAC to develop and practice operating the CPMS prior to the required date of compliance for NESHAP.

At the current PM limit, SAC typically operates with opacity readings well below the visible range (typically less than 2% opacity) and has not shown an opacity violation in over 10 years. Since there are no proposed modifications to the control equipment or processes that affect PM emissions, SAC does not expect opacity or particulate matter emissions to change with this interim approach. Furthermore, daily recorded Method 22 and Method 9 (if necessary) visual

observations during the interim period provide compliance assurance that SAC will remain in compliance with existing Title V permit opacity limits until the CPMS is installed and Method 5 testing is completed per a Title V compliance plan (Table 2 below). To be clear, SAC is committing to conduct opacity monitoring, on or before September 9th, 2015 in accordance with the requirements of 40 CFR 63.1350 (f)(1)(i) through (vii) while the COMS is not operating and the CPMS operating limit has not been established and being calculated in the Continuous Emission Monitoring Data Acquisition System (CEM DAS).

SAC will commit to physically installing (meaning the devices are physically installed, communicating with the existing CEM DAS, and all proper control logic has been developed) the CPMS within 30 days of COM removal. SAC is requesting an additional 60 days for SAC to become familiar with the CPMS and to conduct initial testing per a compliance plan in accordance with 40 CFR 63.1349(b)(1)(i) through (vi) requirements for the new CPMS system to set an initial operating limit based on SAC's current PM limits. After SAC completes the initial tests per the compliance plan, 30 valid kiln operating days will be collected to assess compliance via the CPMS operating limit. SAC proposes to provide written notice to DEP upon removal of the COMS, completion of physical installation of the CPMS, prior to initial testing, and when the switch to compliance by CPMS was made. SAC is committed to having the CPMS fully operational and demonstrating compliance with 40 CFR 63.1350.

TABLE 2: PROPOSED TITLE V COMPLIANCE PLAN

Action/ Plan	Method of Compliance	Proposed Date Kiln Stack (EU004)	Proposed Date Cooler Stack (EU005)	DEP Notified
Removal of COMS	Daily Method 22/9	By June 1, 2015	By June 1, 2015	within 24 hours
¹ Installation of CPMS	Daily Method 22/9	Within 30 days from date of removal	within 30 days from date of removal	Within 7 days
² Set initial operating limit	Daily Method 22/9	Conduct Method 5 test within 60 days from install. Establish interim operation limit	Conduct Method 5 test within 60 days from install. Establish interim operation limit.	15 days prior to scheduled testing & test report within 45 days from test completion
Begin PM Monitoring by CPMS	³ CPMS Daily Rolling Average	After Method 5 testing and determination of operating limit.	After Method 5 testing and determination of operating limit.	Beginning date and periods greater than operating limit via Quarterly Report
Begin 30 kiln operating day interim operation limit.	Conduct Method 5 test if CPMS 30 day rolling average above interim operation limit	⁴ After 30 valid kiln-operating days of CPMS data have been collected, but prior to LLL compliance date.	⁴ After 30 valid kiln-operating days of CPMS data have been collected, but prior to LLL compliance date.	Beginning date via Quarterly & Semi-Annual Report
Compliance with NESHAP PM limits	CPMS 30 day rolling average	Subpart LLL compliance date (September 9th, 2015 as applicable)	Subpart LLL compliance date (September 9th, 2015 as applicable)	Beginning date via Quarterly & Semi-Annual Report

⁰ Deadline for removal dependent upon the acceptance date of this proposed plan.

¹ Installation, for these purposes, is only complete when the CPMS are fully functional including CEM DAS communication and proper control logic has been established.

² Testing in accordance with 40 CFR 63.1349(b)(1)(i) through (vi) requirements conducted under raw mill up conditions will be used to set an operating limit based on SAC's current limits and new limits (as displayed in Table-1 above). SAC may conservatively and for ease of calculation include kiln startup and shutdown readings. The new operating limits will go into effect per NESHAP LLL requirements.

³ Daily Method 22/9 if rolling average values greater than interim operating limit

⁴ If there are high readings of the 30-Day Rolling Average above the operating limit SAC will retest in accordance with 40 CFR 63.1350 (b)(1)(i) through (vi).