

APPENDIX 1 (9a)

Materials Management for THC/VOC Emissions Control

MATERIALS MANAGEMENT FOR THC/VOC EMISSIONS CONTROL

1. OBJECTIVE

This Management Plan describes the actions carried out by the Plant for the sampling, approval, and continued testing of raw materials used in the clinker manufacturing process. Laboratory test data will determine if the raw material will be authorized for initial use, and continued use to control emissions of Total Hydrocarbon (THC) and Volatile Organic Compound (VOC).

2. IMPLEMENTATION AND RESPONSIBILITIES

This Management Plan applies to all raw materials that may contribute to THC and VOC emissions in the clinker manufacturing process. The personnel responsible for its implementation are:

- the Quality Control Manager
- the Production Manager
- the Environmental Manager
- the Plant Manager

3. INTERRELATIONS WITH OTHER PROCEDURES

There are interrelations with:

- Sample preparation procedures
- Laboratory test equipment operating instructions

4. DESCRIPTION

4.1. Initial sample collection of raw materials

4.1.1. The initial sample taken by American Cement Company, LLC personnel at the site of the material or by others at the site of the material must be a grab of at least four (4) locations around the raw material pile. Each grab sample should be taken at a minimum of 6" to 8" deep in the pile.

4.1.2. The grab samples shall be poured into a common container of sufficient volume to provide a composite sample of raw material large enough to run Toxic Organic Compound (TOC) test at a third party laboratory.

4.1.3. The composite sample shall be tested for TOC, Sulfur, and Carbon Content at a third party laboratory.

4.1.4. If the test results show the material is in compliance as it relates to tests in 4.1.3 then a sample or trial run may be conducted not to exceed 250 short tons. If results are inconclusive a second trial run may be conducted of 250 short tons.

4.2. Trial sample collection of raw materials

4.2.1. The trial samples taken by American Cement Company, LLC personnel shall be taken from material dumped from at least one (1) of every ten (10) truckloads of raw

material delivered, or at least from one (1) truckload if less than ten (10) truckloads are delivered. These shall be at a minimum of two (2) grab samples from the pile of raw material dumped from the trucks.

4.2.2. Grabs samples shall be poured into a common container of sufficient volume to provide a composite sample of raw material large enough to run required tests.

4.2.3. The composite sample shall be tested for TOC, Sulfur, and Carbon Content in the American Cement Company, LLC QC Lab, or a third party lab.

4.3. Periodic verification of raw materials

4.3.1 Materials meeting the proper standards shall be periodically reviewed for compliance. Verification samples shall be taken from raw material piles in the Raw Material Storage Building. A minimum of one (1) grab samples from the pile of raw material in current use will be taken monthly.

4.3.2 These grabs samples shall be poured into a common container of sufficient volume to provide a composite sample of raw material large enough to run required tests.

4.3.3 The composite sample shall be tested for TOC, Sulfur, and Carbon Content in the American Cement Company, LLC QC Lab.

5. REPORTS

5.1 The following reports shall be used to approve or disapprove use of a raw material:

- the Initial Test Results
- the Trial Test Results
- the Periodic Test Results