

**EASTERN KERN AIR POLLUTION CONTROL DISTRICT
TECHNICAL SUPPORT DOCUMENT FOR
NATIONAL CEMENT COMPANY OF CALIFORNIA, INC.
2024 TITLE V PERMIT RENEWAL NO: 1128-V-2000**

2700 "M" Street, Suite 302
Bakersfield, California 93301
Telephone: 661-862-5250

APPLICATION RECEIVED FROM: **NATIONAL CEMENT COMPANY OF CALIFORNIA, INC.
15821 VENTURA BLVD, SUITE 475
ENCINO, CALIFORNIA 91436**

PLANT SITE LOCATION: **5 Miles East of I-5 on Hwy. 138
Lebec, California 93243**

SECTION/TOWNSHIP/RANGE: **SE35/T09N/R18W**

APPLICATION PROCESSED BY: **Jeremiah Cravens, Senior AQS**

APPLICATION REVIEWED BY: **Jeremiah Cravens, Senior AQS**

NATURE OF BUSINESS: **Portland Cement Manufacturing**

SIC Code: **3241**

RESPONSIBLE OFFICIAL: **Thomas Snowden**
Title: **Environmental Manager**
Telephone: **(661) 495-1976**

FACILITY CONTACT PERSON: **Thomas Snowden**
Title: **Environmental Manager**
Telephone: **(661) 495-1976**

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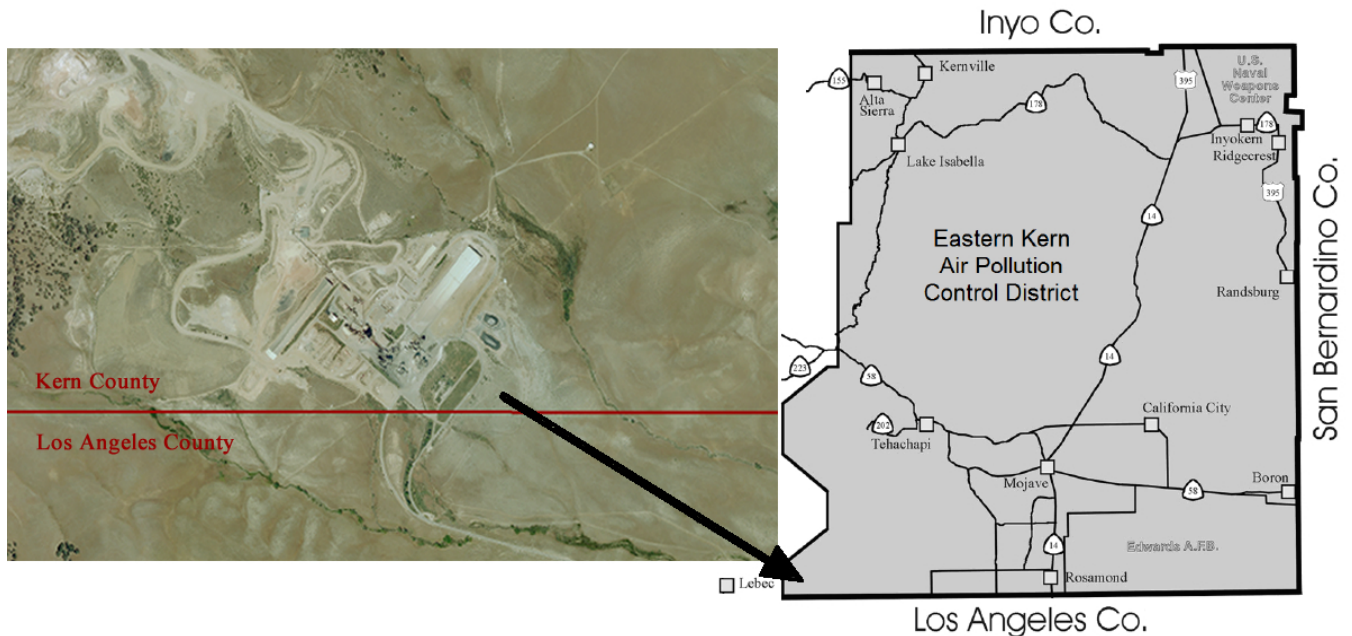
I. INTRODUCTION

This Technical Support Document (TSD) pertains to the National Cement Company of California, Inc. (National Cement) 2024 Title V Permit No. 1128-V-2000 renewal. Permit No. 1128-V-2000 renewal allows National Cement to continue operation of a limestone quarry and a dry process cement kiln operation following the requirements of Eastern Kern Air Pollution Control District's (District) Rule 201.1, Permits to Operate for Sources Subject to Title V of the Federal Clean Air Act Amendments of 1990.

Attainment Classification

The facility is located in an area of District classified Severe Nonattainment/ for the 2008 and 215, 8-hour Ozone NAAQS. The major source threshold is 25 tons per year for Volatile Organic Compounds (VOC)s and Oxides of Nitrogen (NOx). The District is designated attainment or unclassifiable for the pollutants NO₂, SO₂, CO, PM₁₀, PM_{2.5}, and lead. The major source threshold of these pollutants is 100 tons per year.

II. FACILITY LOCATION



III. BACKGROUND

Pursuant to District Rule 201.1, Permits to Operate for Sources Subject to Title V of the Federal Clean Air Act Amendments of 1990 (Title V), National Cement's Federal Part 70 Title V Permit to Operate (Title V Permit) is being renewed. The initial Title V Permit was issued to National Cement in 2001. National Cement's Title V Permit has been renewed in 2005, 2011, and 2018.

Upon review of National Cement's 2022 Title V renewal application, District found no significant (major) modifications have occurred to the facility since the last (2018) Title V Permit renewal was issued. Only minor revisions to the facility's previous Title V Permit were made, including adding one new permitted emission unit, revising eleven emission units, removing three emission units, and updating NSPS and NESHAP requirements.

Although National Cement’s Title V renewal application was received by the District July 2022, the District decided to postpone drafting the revised Title V permit and allow the facility to operate under an application shield. The delay was utilized to conduct start-up inspections needed to finalize revised equipment and operational conditions of various emissions units listed on individual operating permits.

National Cement has also had a drastic reduction in cement kiln NOx emissions. This is reflected in the operating limit listed in the permit. The District believed that waiting for this reduced NOx limit to be finalized and listed in the Title V permit beneficial and worth postponing issuance of the Title V renewal.

On September 21, 2023, District submitted a copy of the proposed renewal to National Cement for an initial 45-day review. National Cement provided minimal comments regarding the proposed Title V draft renewal. The bulk of the comments requested adding three truck-mounted vacuum yard sweepers to the draft permit. Those three emission units have been included in the currently proposed permit.

App. Rec.:	8/2/2022	
60-Days:	10/1/2022	
Deemed Complete:	9/1/2022	
Current Title V Permit Expiration:	1/29/2023	Application Shield
Facility 45-Day Review:	Start: 9/21/2023	End: 11/6/2023
Second Facility 45-Day Review:	Start: 1/11/2024	End: 2/24/2024
EPA 45-Day Review:	Start: 1/11/2024	End: 2/24/2024
30 Day Public Notice:	Start: 2/29/2024	End: 3/29/2024
EPA Final 45-Day Review:	Start:	End:

IV. FACILITY DESCRIPTION

The plant consists of a limestone quarry and a dry process cement kiln operation. The cement kiln produces clinker which is used to make cement. The kiln system functions as a counter-current heat exchanger and is composed of two basic sections: The preheater/precalciner tower and the rotary kiln. The preheater/precalciner tower is a structure approximately 300 feet high, with 5 cyclones (stages), including a precalciner section where a percent of the total fuel in the kiln is burned. The rotary kiln is sloped and rotates to move the feed stock from the upper end of the kiln down to the discharge end. Fuels that are not burned at the precalciner are burned at the kiln discharge end.

The primary fuel is petroleum coke, but the system is capable of burning natural gas, tire-derived fuel (TDF), wood, and diesel fuel. The petroleum coke is obtained from various sources in the region, pulverized onsite, and air-conveyed to the burners. Combustion gases are drawn up the kiln length and into the preheater/precalciner tower by the induced draft fan. As the feed material moves down the system, it undergoes several reactions at different temperatures including: Drying of residual moisture, Dehydration of clay minerals, calcination, and Clinkerization.

- Drying of residual moisture: Removal of free moisture from the raw materials.
- Dehydration: Removal of bound water from the compounds.
- Calcination Reaction: Breakdown of carbonates to oxides plus carbon dioxide.
- Clinkerization: Conversion of the oxides to calcium silicates, calcium aluminates, and calcium alumino-ferrites.

Raw feed to the kiln is a mixture of limestone, shale, clay, silica, and iron. Raw materials are mined onsite or imported from offsite. Raw materials are crushed, pulverized, and mixed to the desired concentrations in the raw feed that produce the proper clinker quality. Raw feed is transferred to the kiln by a system of bucket elevators and airslide conveyors. The raw feed enters at the top of the tower and cascades through the stages, contacting the hot gases from the kiln and precalciner counter-currently. Calcined materials enter the kiln at the upper end of the kiln (opposite the burner).

Fuels enter the kiln at the burner. Combustion gases in the rotary kiln reach a peak flame temperature of approximately 3,500 F and gradually cool as they progress through the kiln. Clinker is produced from the kiln and passes through a clinker cooler before being stockpiled. Gases are cooled by a water spray at the conditioning tower, upstream of the fabric filter baghouse. The quantity of water sprayed in the conditioning tower is determined by the temperature of the gases entering the baghouse.

Exit gases are drawn by a system of induced draft (ID) fans, and pass either through the roller mill and/or the baghouse. Dust is collected in the baghouse and returned to the raw material feed stream. Clean exhaust from the baghouse is released to the atmosphere. The baghouse is used only by the kiln and roller mill exhaust gases. Baghouse inlet temperature is set to the desired value in the control room and the computer control system automatically adjusts the water spray rate to achieve the set point temperature. Differential pressure indicators are used on the dust collectors for leak detection along with water and dust suppressant sprays to control dust emissions.

Several parameters are monitored continuously at various locations in the kiln system. These are temperature, combustion gas flow, gas chemical composition (NO_x, CO, O₂) and fuel rates. Combustion gas flow is monitored by direct measurement of pressure drop across a multiple orifice pitot tube and gas temperature.

Continuous Emission Monitoring System (CEMS) consists of a sample probe, heated sample line, sample chiller/condenser and emissions monitors for NO_x, CO, SO_x, VOC, and PM. A sample probe is located on the gas exhaust stack at the 6th level of the preheater/precalciner tower. All monitors are located inside an environmentally controlled enclosure.

Clinker is ground into a fine powder and mixed with appropriate portions of imported gypsum and other materials to become product cement. Product is stored in silos before being loaded into the customer's delivery trucks.

V. EQUIPMENT LISTING

<u>Unit No.</u>	<u>Description of Source</u>
001	Primary Crushing & Ore Storage
002	Secondary Crushing & Ore Storage
003	Raw Material Reclaiming, Grinding, & Storage
005	Petroleum Coke Fuel System
006	Clinker Cooling & Storage System
007	Finish Mill #1 & Storage
008	Finish Mill #2
009	Gypsum Truck Off-Loading Operation
010	Cement Storage & Shipping
017	Quarry Operation
018	Gasoline Storage & Dispensing System
025	Emergency Generator Set
026	Emergency Generator Set
028	Truck-Mounted Vacuum
033	Vacuum Type Fugitive Dust Yard Sweeper
034	Synthetic Gypsum Receiving & Storage
035	Truck-Mounted Vacuum
036	Cement Finish Mill #3
037	Emergency Piston Engine with Generator
038	Screening Plant
039	Tire Derived and Wood Fuel Storage, Receiving, and Handling Equipment
040	Secondary Alternate Fuels Receiving/Handling System
042	Preheater/Precalciner Cement Kiln System
044	Fugitive Dust Yard Sweeper
045	Quarry Drill
046	Truck-Mounted Vacuum
048	Portable Crushing & Screening Operation

VI. FACILITY EMISSIONS

Tables 1 and 2 below list National Cement’s plant-wide stationary source emissions.

Table 1

Criteria Pollutant Emissions (tons per year)					
Pollutant:	PM ₁₀	NO _x	SO _x	VOC	CO
Potential Emissions:	975	1,202	261	44	5,262

Reported for year 2022

Table 2

Facility-Wide GHG Emissions	
CO ₂ e (tpy):	961,648

Reported for year 2022

Carbon Dioxide Equivalent, CO₂ Equivalent (CO₂e): Measure for comparing carbon dioxide with other GHGs, based on the quantity of those gases multiplied by the appropriate Global Warming Potential (GWP).

Global Warming Potentials

Greenhouse Gases	GWP	CO ₂ e (tpy)
Carbon dioxide (CO ₂)	1	956,994
Nitrous oxide (N ₂ O)	21	3,100
Methane (CH ₄)	310	1,554
Hydrofluorocarbons (HFCs)	**	-
Perfluorocarbons (PFCs)	**	-
Sulfur Hexafluoride (SF ₆)	23,900	-

**GWP varies based on each pollutant.

Global Warming Potential (GWP): The capacity to heat the atmosphere, calculated as the ratio of the time-integrated radiative forcing from the instantaneous release of 1 kilogram (kg) of a substance relative to that of 1 kg of CO₂. GWP shall be calculated according to the factors for a 100-year time horizon, as stated in 40 CFR Part 98 Subpart A Table A-1 (Global Warming Potentials).

VII. APPLICABLE FEDERAL REQUIREMENTS

Sources are subject to the most recently Board adopted version of a rule. Most of the rules this facility is subject to are part of the State Implementation Plan (SIP) but a few are considered “local only” meaning they are not part of the SIP. In some instances a current rule will differ from the SIP approved version due to a revision. This is called a SIP gap and happens when EPA has not yet acted on a SIP submittal.

Enforcement of a rule awaiting SIP approval should guarantee compliance with its SIP approved counterpart. This is because the pending rule will be at least as stringent as the SIP rule. The table below lists all rules and regulations this facility is subject to. SIP approved rules list their approval date along with current revision date (if applicable), thus making them federally enforceable.

Rule No. Rule Title and Description of Conditions

Rule 107 Inspections

Inspections shall be made by the enforcement agency for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations, including authority to require record keeping and to make inspections and conduct tests of air pollution sources.

<u>Rule No.</u>	<u>Rule Title and Description of Conditions</u>
Rule 108 SIP Approved 2004	<u>Stack Monitoring</u> Upon the request of and as directed by the Control Officer, the owner shall provide, install, and operate continuous monitoring equipment on such operations as directed. The owner shall maintain, calibrate, and repair the equipment and shall keep the equipment operating at design capabilities.
Rule 108.1 SIP Approved 2001	<u>Source Sampling</u> Upon the request of the Control Officer and as directed by him the owner of any source operation which emits or may emit air contaminants, for which emission limits have been established, shall provide the necessary and proper facilities for source sampling. The applicable test method, if not specified in the rule, shall be conducted in accordance with Title 40 CFR, Subpart 60, Appendix A - Reference Methods, except particulate matter (PM10) for compliance with Rule 210.1 requirements shall be conducted in accordance with Title 40 CFR, Subpart 51, Appendix M, Method 201 or 201A. Where no test method exists in the preceding references for a source type source sampling shall be conducted in accordance with California Air Resources Board (CARB) approved methods.
Rule 111 Rescinded 2016	<u>Equipment Breakdown</u> An occurrence which constitutes a breakdown condition, and which persists only until the end of the production run or 24-hours, whichever is sooner (except for continuous monitoring equipment, for which the period shall be ninety-six (96) hours), shall constitute a violation of any applicable emission limitation or restriction prescribed by these Rules and Regulations; however, no enforcement action may be taken provided the owner or operator demonstrates to the Control Officer that a breakdown condition exists and the proper requirements are met.
Rule 114 SIP Approved 1999	<u>Severability</u> If any provision, clause, sentence, paragraph, section or part of these Regulations or application thereof to any person or circumstance shall for any reason be adjudged by a court of competent jurisdiction to be unconstitutional or invalid, such judgment shall not affect or invalidate the remainder of this Regulation and the application of such provision to other persons or circumstances, but shall be confined in its operation to the provision, clause, sentence, paragraph, section or part thereof directly involved in the controversy in which such judgment

shall have been rendered and to the person or circumstance involved, and it is hereby declared to be the intent of the District Board that these Regulations would have been issued in any case had such invalid provision or provisions not been included.

Rule No.

Rule Title and Description of Conditions

Rule 201.1
Title V Rule
Revised
2022

Applicability of Federally Enforceable Conditions

Federally Enforceable Conditions **shall apply** to Design Conditions, Operational Conditions, Special Conditions, Compliance Testing Requirements, and Emission Limits. Any District or State-only condition (not required by the EPA) does not apply.

Rule 201.1

Permit Life

The life of this permit shall be five years from the date of issuance.

Rule 201.1

Administrative Permit Amendment and Minor Permit Modification

Administrative Permit Amendment and Minor Permit Modification are those actions taken by the District as defined in Rule 201.1.

Rule 201.1

Compliance with Permit Conditions

- A. National Cement shall comply with all permit conditions;
- B. Permit does not convey any property rights or any exclusive privilege;
- C. Non-compliance with any permit condition shall be grounds for permit termination, revocation and reissuance, modification, enforcement action or denial of permit renewal;
- D. National Cement shall not use “need to halt or reduce a permitted activity in order to maintain compliance” as a defense for non-compliance with any permit condition;
- E. Pending permit action or notification of anticipated non-compliance does not stay any permit condition; and
- F. Within a reasonable time period, National shall furnish any information requested by the APCO, in writing, for purpose of determining: 1) compliance with the permit, or 2) whether or not cause exists for a permit or enforcement action.

Rule No. **Rule Title and Description Conditions**

Rule 201.1 **Referencing of District and Applicable Requirements**

Pursuant to Rule 201.1.VI.C. District hereby references the following documents which are clearly identified and available to the District and to the public:

Each reference shall include, at a minimum, title or document number, author and recipient if applicable, date, citation of relevant sections of the Rule or document, and identification of specific source activities or equipment for which the referencing applies.

Rule 201.1 **Emergency Provisions**

- A. National Cement shall comply with the requirements of Rule 111 and the emergency provisions contained in all permit streamlining requirements imposed in accordance with Subsection VI.J. all District-only rules which apply in accordance with Subsection VI.K.1. and all applicable federal requirements not subsumed by such permit streamlining requirement(s) or District-only rules;
- B. Within two weeks of an emergency event, an owner or operator of the source shall submit to the District a properly signed, contemporaneous log or other relevant evidence which demonstrates that:
 - 1) An emergency occurred;
 - 2) The permittee can identify the cause(s) of the emergency;
 - 3) The facility was being properly operated at the time of the emergency;
 - 4) All steps were taken to minimize the emissions resulting from the emergency; and
 - 5) Within two working days of the emergency event, the permittee provided the District with a description of the emergency and any mitigating or corrective actions taken;
- C. In any enforcement proceeding, the permittee has the burden of proof for establishing that an emergency occurred.

Rule No. **Rule Title and Description Conditions**

Rule 201.1 **Right of Entry**

National Cement shall allow entry of District, CARB, or U.S. EPA officials for purpose of inspection and sampling, including:

- A. Inspection of the stationary source, including equipment, work practices, operations, and emission-related activity;
- B. Inspection and duplication of records required by the permit to operate; and
- C. Source sampling or other monitoring activities.

Rule 201.1 **Testing**

National Cement shall conduct stack testing annually and at other times as specified by U.S. EPA or the District, in accordance with the methodology outlined in EPA Methods 5-8, 7E, 10, 18 or equivalent, to verify compliance with emission limits and the accuracy of any continuous in-stack monitors. The District and U.S. EPA shall be notified at least 30 days in advance of the testing to allow an observer to be present and the report of results shall be transmitted to the District as soon as they are available. (PSD Permit #SE95-01 and District Rule 210.1)

Rule 201.1 **Record Keeping**

- A. Recording of maintenance of all monitoring and support information associated with all permit streamlining requirements imposed in accordance with Rule 201.1, Subsection VI.J., all District-only rules which apply in accordance with Rule 201.1, Subsection VI.K.1., and all applicable federal requirements not submitted by such permit streamlining requirement(s) or District-only rules, including:
 - 1) Date, place, and time of sampling;
 - 2) Operating conditions at time of sampling;
 - 3) Date, place, and method of analysis; and
 - 4) Results of analysis;
- B. Retention of records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application; and

- C. Any other record keeping deemed necessary by the APCO to ensure compliance with all permit streamlining requirements imposed in accordance with Rule 201.1, Subsection VI.J., all District-only rules which apply in accordance with Rule 201.1, Subsection VI.K.1., and all applicable federal requirements not subsumed by such permit streamlining requirement(s) or District-only rules.

<u>Rule No.</u> Rule 201.1	<u>Rule Title and Description Conditions</u> <u>Periodic Monitoring</u>
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Non-Point

National Cement shall conduct testing semi-annually, in accordance with the methodology contained in EPA Method 22 for all active non-point sources. This testing will be the basis for determining compliance with the visible emission standard in District Rule 401. If no emissions are observed utilizing Method 22, the non-point source shall be deemed to be in compliance with the visible emission standard. If emissions are observed from any non-point source and that source is not operating under breakdown condition as defined in and allowed for in District Rule 111, National Cement shall conduct testing on that non-point source within 24 hours of the Method 22 testing in accordance with EPA Method 9 to verify compliance with the visible emission standard.

NOTE: This requirement does not apply to fugitive emissions resulting from activities not covered by a permit to operate unless the source is subject to District Rule 210.1 (NSR) requirements.

Point

National Cement shall conduct testing semi-annually, in accordance with the methodology contained in EPA Method 22 for all active/in use point sources. This testing will be the basis for determining compliance with the visible emission standard in District Rule 401. If no emissions are observed utilizing Method 22, the point source shall be deemed to be in compliance with the visible emission standard. If emissions are observed from any point source and that point source is not operating under breakdown condition as defined in and allowed for in District Rule 111, National Cement shall conduct testing on that point source:

- A. Within 24 hours of the Method 22 testing in accordance with EPA Method 9 to verify compliance with the visible emission standard. If compliance is not documented:
- B. Within 30 days of the Method 9 testing in accordance with EPA Method 5 or 5D to verify compliance with the requirements of District Rules 404.1, 405, 406 and/or 210.1.

Rule No. **Rule Title and Description Conditions**

Rule 201.1 **Additional Monitoring**

Diesel standby and emergency piston engines do not require opacity monitoring if utilizing California diesel or other low-sulfur, low aromatic fuel including PUC natural gas, LPG, and propane.. Fuel records shall be kept for verification purposes and an operational log for hours of operation.

All control equipment shall be inspected annually for proper operation. National Cement shall maintain all records of control equipment maintenance for a period of five years.

Monitoring shall be the responsibility of the source; however, a visible emissions inspection or Method 9 conducted by a District inspector may be counted as meeting the requirement for the source to conduct same if the information and records generated by the inspector meets the requirements of the permit and a copy of the records are maintained by the source for a period of five years.

Record keeping provisions associated with all monitoring requirements shall include the following information:

- A. Identification of stack or emission point being monitored;
- B. Operational conditions at the time of monitoring;
- C. Records of any monitoring conducted, including records of emission or operational parameter values and the date, place and time of sampling or measurement; and
- D. Where corrective action is triggered, description of the corrective action and the date, time and results of any corrective action.

Rule No. Rule Title and Description Conditions

Rule 201.1 Monitoring, Testing, Record Keeping Requirements
(Portland Cement Kilns - Oxides of Nitrogen)

Continuous NO_x emissions monitoring system records and clinker production records for the cement kiln shall be maintained at the facility for a period of at least five years and made readily available to District personnel.

Oxides of nitrogen stack testing for purposes of this requirement shall be conducted using EPA Test Method 7E.

Stack gas flow rate testing for purposes of this requirement shall be conducted using EPA Test Method 2.

The following formula shall be used to convert uncorrected observed NO_x concentration in ppm to tons per day at standard conditions of 68° F and a gas pressure of 29.92 inches of mercury:

$$\frac{\text{Tons} \cdot \text{NO}_x}{\text{day}} = (\text{ppmv} \cdot \text{NO}_x) \times \left(\frac{46 \text{ grams}}{\text{mole}} \right) \times (1.56 \times 10^{-7}) \left(\frac{\text{dscf}}{\text{min}} \right) \times (0.0120)$$

**Rule 209
SIP**

Approved
(1972)

Revised
1995

Conditional Approval

The Control Officer shall issue an Authority to Construct or a Permit to Operate, subject to conditions to insure compliance of the operation of any article, machine, equipment or other contrivance within the standards of Rule 208 and 208.1, in which case the conditions shall be specified in writing.

Commencing work under such Authority to Construct or operation under such Permit to Operate shall be deemed acceptance of all conditions so specified. The Control Officer shall issue an Authority to Construct or Permit to Operate with revised conditions upon receipt of a new application, if the applicant demonstrates the article, machine, equipment or other contrivance can be operated within the standards of Rule 208 and 208.1 under the revised conditions.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 210.1 SIP Approved (1981) Revised 2000	<u>Standards for Authority to Construct</u> A. The Permittee may make a change to this permitted facility that is not addressed or prohibited by the federally enforceable conditions of this Part 70 permit without obtaining a Part 70 permit revision if: <ol style="list-style-type: none"> 1) The Permittee has obtained all permits and approvals required by District Rules 201 and 210.1 (unless the change is exempt under District Rule 202); 2) The change is not subject to any requirements under Title IV of the Clean Air Act; 3) The change is not a Title I modification; and 4) The change does not violate an applicable requirement of the Clean Air Act or a federally enforceable term or condition of this permit. B. For a change that qualified under this section, the Permittee shall provide contemporaneous written notice to the District and the U.S. EPA (except for a change that is exempt under District Rule 202). This written notice shall describe the change, including the date it was made, and shall contain other information as required to determine new applicable requirements of the Clean Air Act that apply as a result of the change; C. Upon satisfying the requirements of paragraph B above, the Permittee may make the proposed change; D. Changes that qualify under this section are not subject to the requirements for Part 70 revisions; E. The Permittee shall include each off-permit change made under this section in the application for renewal of this Part 70 permit; and F. The permit shield(s) provided in this permit do not apply to off-permit changes made under this section.

Rule 210.4 SIP Approved 2013	<u>Prevention of Significant Deterioration (PSD)</u> National Cement May be subject to District Rule 210.4, Prevention of Significant Deterioration (PSD) if it undergoes major modification(s).
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PSD Permit	PSD Permit NSR4-4-1, SJ 95-01 PSD Permit conditions in Appendix A of National Cement’s Title V permit apply to this facility.
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Rule No. **Rule Title and Description Conditions**

Rule 301 **Permit Fees**

Every applicant for an Authority to Construct or a Permit to Operate shall pay a filing fee. For issuance of an Authority to Construct, or an initial Permit to Operate, the applicant shall pay fees as prescribed in Rule 301. For issuance of an Authority to Construct, application processing fees shall also be paid as prescribed in Rule 303. The applicant shall receive credit for filing fees paid.

Annually on the anniversary of issuance of a Permit to Operate, the permittee shall pay a renewal fee as prescribed in Rule 301. Fees collected pursuant to Rule 201.1, Section VIII.B. shall supplement applicable Rules 301 and 301.3 fee requirements.

Payment of Supplemental Fee

An owner or operator, or his designee, shall pay an annual supplemental fee for a permit to operate pursuant to Rule 201.1 as determined by the calculation method in Subsection VIII.B.3., to provide a District-wide fee rate of \$25 per ton of fee-based emissions (CPI-adjusted) for all facilities subject to Rule 201.1, unless Rule 201.1 VIII.B.2. applies.

Rule 301.4 **Greenhouse Gas Fee**

Any stationary source that has actual GHG emissions, in the prior calendar year, greater than or equal to 100,000 tons of CO₂e, as calculated in accordance with 40 CFR Part 98, shall pay a Consumer Price Index (CPI) adjusted GHG fee per ton of CO₂e being emitted. Sources subject to this Rule shall submit an annual report of GHG emissions to the District no later than the thirty-first day of March.

Rule 401 **Visible Emissions**

SIP
Approved
2001

Unless otherwise stated in equipment specific permits, the following limits apply:

A person shall not discharge into the atmosphere, from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

A. As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or

B. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in Subsection A.

Rule No.	<u>Rule Title and Description Conditions</u>
Rule 404.1 SIP Approved 2008	<u>Particulate Matter Concentration - Desert Basin</u> A. A person shall not discharge into the atmosphere from any single source operation, in service on the date this Rule is adopted, particulate matter in excess of 0.2 grains per cubic foot of gas at standard conditions. B. A person shall not discharge into the atmosphere from any single source operation, the construction or modification of which commenced after the adoption of this Rule, particulate matter in excess of 0.1 grains per cubic foot of gas at standard conditions.
Rule 405 SIP Approved 1984 Revised 1997	<u>Particulate Matter - Emission Rate</u> A person shall not discharge into the atmosphere from any source operation, particulate matter in excess of the limits set forth in the allowable particle emissions based on process weight rate table included in Rule 405.
Rule 406 SIP Approved 1972	<u>Process Weight - Portland Cement Kilns</u> Cement kilns, the construction or modification of which is commenced after August 17, 1971, shall not discharge into the atmosphere particulate matter in excess of the Environmental Protection Agency Standards of Performance. Cement kilns regulated by this Rule are not subject to other process weight Rules.
Rule 407 SIP Approved 1972	<u>Sulfur Compounds</u> A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 percent by volume calculated as sulfur dioxide (SO ₂).
Rule 409 SIP Approved 1999	<u>Fuel Burning Equipment - Combustion Contaminants</u> A. Fuel burning equipment, the construction or modification of which is commenced after August 17, 1971, shall not discharge into the atmosphere particulate matter, sulfur dioxide or nitrogen oxides in excess of the Environmental Protection Agency Standard of Performance. B. A person shall not discharge into the atmosphere combustion contaminants exceeding in concentration at the point of discharge: 0.1 grain per cubic foot of gas calculated to 12 percent of carbon dioxide (CO ₂) at standard conditions.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 410 SIP Approved (1977) Revised 2022	<u>Organic Solvents</u> A person shall not discharge into the atmosphere more organic materials in any one day from any article, machine, equipment or other contrivance in which any organic solvent or any material containing organic solvent is utilized unless the emissions are controlled or reduced as outlined in the organic solvent rule (410). On and after March 8, 2024, from all VOC-containing materials, equipment, and processes subject to this rule, an operator shall not emit to the atmosphere VOCs in excess of 450 pounds VOC per calendar month per facility. 1. Compliance with provisions above may be obtained through use of any of the following or any combination thereof: <ol style="list-style-type: none"> a. Product reformulation or substitution; b. Process changes; c. Improvement of operation efficiency; d. Development of innovative technology;
Rule 410.3 SIP Approved 1999	<u>Organic Solvent Degreasing Operation</u> A person shall not operate any organic solvent degreasing operation unless the equipment utilized complies with all applicable requirements of Rule 410.3.
Rule 411 SIP Approved 1998	<u>Storage of Organic Liquids</u> A person shall not use equipment to store organic liquids and petroleum distillates with a true vapor pressure greater than 1.5 psia unless provisions are made for controlling organic vapors.
Rule 412 SIP Approved 1995 Revised 2022	<u>Gasoline Transfer into Stationary Storage Containers, Delivery Vessels and Bulk Plants</u> No person shall transfer or permit the transfer of gasoline from any delivery vessel into any stationary storage container subject to requirements of this rule unless: <ol style="list-style-type: none"> a. Such container, except those used for aviation gasoline, is equipped with an CARB certified permanent submerged fill pipe and utilizes an CARB certified Phase I vapor recovery system that is maintained and operated according to manufacturer specifications and the applicable CARB Executive Order; or b. Containers used for aviation gasoline are equipped with a permanent submerged fill pipe and a Phase I vapor recovery system that is certified (or was previously certified) to meet a minimum volumetric control of 95%.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 412	<p><u>Monitoring, Testing, Record Keeping Requirements</u> (Applies to EU 018) (Gasoline Storage - Phase I)</p> <p>A. All records required to demonstrate compliance with the requirements of Rule 412 shall be retained on the premises for a minimum of five (5) years and made available on site during normal business hours to the District upon request.</p> <p>B. Operators shall conduct all performance tests required by CARB Executive Order and facility installation and operations manual as per the frequency outline therein.</p> <p>C. The Reid Vapor Pressure of gasoline shall be determined in accordance with ASTM D 5191-01.</p> <p>D. All test procedures shall be conducted in accordance with the latest version of the test procedures, or their equivalents as approved in writing by the APCO and EPA.</p>

<p>Rule 412.1 SIP Approved 1996 Revised 2022</p>	<p><u>Transfer of Gasoline into Vehicle Fuel Tanks</u></p> <p>A person shall not transfer or permit the transfer of gasoline from a stationary storage container into a motor vehicle fuel tank with a maximum capacity of more than five (5) gallons unless the gasoline-dispensing unit is equipped with, and has in operation a CARB-Certified Phase II Vapor Recovery System.</p> <p>1. All CARB certified Phase II vapor recovery systems shall be maintained according to CARB certifications and the manufacturer specifications applicable to the system.</p> <p>2. All CARB certified Phase II vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method in Section V.D.4.</p>
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Rule 412.1	<p><u>Monitoring, Testing, Record Keeping Requirements</u> (Applies to EU 018) (Gasoline Storage & Dispensing - Phase II)</p> <p>A. Verification that each CARB-Certified Phase II Vapor Recovery System meets or exceeds the requirements of tests specified in Rule 412.1 Subsection V.C shall be maintained. These test results shall be dated and shall contain the names, addresses, and telephone numbers of person(s) responsible for system installation and testing.</p>
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- B. Operators shall comply with the CARB certified Phase II vapor recovery system performance tests specified in Sections V.C.1.a through V.C.1.D of Rule 412.1, and shall conduct all applicable performance tests at start up and thereafter (no more than 30 days before or after the required compliance testing date) as required by the applicable CARB Executive Order and installation and operation days.
- C. Tests shall be conducted in accordance with the latest version of the CARB and EPA approved test methods, or their equivalents as approved by the EPA, and the APCO.

Rule No.

Rule Title and Description Conditions

Rule 419
SIP
Approved
1972

Nuisance

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.

Rule 422
SIP
Approved
1977

Revised
2022

Federal New Source Performance Standards (NSPS)

Provisions of Part 60, Chapter 1, Title 40, Code of Federal Regulations are hereby adopted by reference and made a part hereof. All new and modified sources shall comply with standards, criteria and requirements set forth therein.

All applicable requirements of 40 CFR Part 60, Subparts A, (General Requirements), F (Portland Cement Plants), and IIII (Compression Ignition Internal Combustion Engines), apply to this facility.

Subpart F

Standards of Performance for Portland Cement Plants

Provisions of this subpart apply to the kiln, clinker cooler, raw mill system, finish mill system, raw mill dryer, clinker storage, finished product storage, conveyor transfer points, bagging and bulk loading and unloading systems.

<u>Rule No.</u>	<u>Rule Title and Description Conditions</u>
Rule 423 SIP Approved 1977 Revised 2022	<p><u>National Emission Standards for Hazardous Air Pollutants and Source Categories (NESHAPS)</u></p> <p>Provisions of Title 40, Chapter 1, Parts 61 and 63, Code of Federal Regulations are hereby adopted by reference and made a part hereof. All sources of hazardous air pollution shall comply with applicable standards, criteria and requirements set forth herein.</p> <p>All applicable requirements of 40 CFR Part 61, Subpart M (Asbestos) and 40 CFR Part 63, Subparts A (General Provisions), LLL (Portland Cement Manufacturing Industry), and ZZZZ (RICE) apply to this facility.</p> <p>National Cement shall comply with the applicable requirements of Sections 61.145 through 61.147 of the National Emission Standard for Asbestos for all demolition and renovation projects.</p> <p>For the purposes of 40 CFR Part 63, Subpart LLL, “Significant Change” is defined as the use by the facility of a fuel or alternate raw material that is a Federally regulated hazardous waste. The normal use of District approved fuels and/or fuel blends and District approved raw materials or raw material blends does not constitute a “significant change” in operation of the facility.</p> <p>For the purposes of 40 CFR Part 63, Subpart ZZZZ, “Stationary Reciprocating Internal Combustion Engines” You are subject to this subpart if you own or operate a stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.</p>

<u>Federal Rule</u>	<u>Rule Title and Description Conditions</u>
40 CFR 68	<u>Risk Management Plan</u>

Should this stationary source, as defined in 40 CFR section 68.3, become subject to the accidental release prevention regulations in part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in section 68.10 and shall certify compliance with the requirements of part 68 as part of the annual compliance certification as required by 40 CFR part 70 or 71.

Federal Rule **Rule Title and Description Conditions**

**40 CFR
70.5d**

Compliance Certification

The owner/operator shall comply with the following procedures for compliance certification:

- A. Submittal of a compliance certification by the owner or operator to the U.S. EPA and copy to the APCO within 60 days after end of compliance certification period;
- B. Compliance certification period shall begin April 1 of each year and end March 31 of the following year;
- C. Such compliance certification shall identify the basis for each permit term or condition, e.g., specify the emissions limitation, standard or work practice, and a means of monitoring compliance with the term or condition;
- D. Such compliance certification shall include compliance status and method(s) used to determine compliance for the current time period and over entire reporting period; and
- E. Such compliance certification shall include any additional inspection, monitoring or entry requirement promulgated pursuant to Sections 114(a) and 504(b) of the CAA.

Any application form, report, or compliance certification submitted pursuant to these regulations shall contain certification by a responsible official of truth, accuracy, and completeness. This certification and any other certification required under this part shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

U.S. EPA's Mailing Address:

Director, Air Division
75 Hawthorne Street
AIR-3
San Francisco, CA 94105

Federal Rule **Rule Title and Description Conditions**

40 CFR 82 **Protection of Stratospheric Ozone**

Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR §82.156.

Equipment used during maintenance, service, repair, or disposal of appliances must meet the standards for recycling and recovery equipment in accordance with 40 CFR §82.158.

Persons performing maintenance, service, repair or disposal of appliances must be certified by a certified technician pursuant to 40 CFR §82.161.

CAA
Section
112(r)(7)

Clean Air Act

Should this stationary source, as defined in 40 C.F.R. section 68.3, become subject to the accidental release prevention regulations in part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in section 68.10 and shall certify compliance with the requirements of part 68 as part of the annual compliance certification as required by 40 C.F.R. part 70 or 71.

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VIII. NEW AND MODIFIED EQUIPMENT UNITS

One new emissions units has been added, nine emissions units have been modified, and three emissions units have been take out of service (permits canceled) since issuance of the last Title V permit renewal (March 2018). All new and modified equipment units have been considered minor facility modifications and do not increase plant-wide emissions to an amount that will exceed the daily maximum; therefore, public noticing of each modification was not required.

New, modified, and removed emissions units have contributed to the following ton per year (ton/yr) emissions decrease: PM₁₀-28.52, SO₂- 0.078, NO₂- 10,007.35, VOC-0.03. Summaries of the new, modified, and removed emissions units are as follows:

A. New Units

<u>Equipment Unit</u>	<u>Description</u>
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048	<u>Portable Crushing & Screening Operation</u> : Portable Closed Circuit Impactor/Screen Plant with 450-bhp Tier 4 Final Diesel engine driving crusher & 150-kW generator. PTE Emissions ton/yr: PM ₁₀ 2.05, SO ₂ 0.002, NO _x 0.15, VOC 0.07, CO 1.29
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B. Modified Units

<u>Equipment Unit</u>	<u>Description</u>
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001	<u>Primary Crushing & Ore Storage</u> : Added operational conditions. <i>No change in emissions.</i>
002	Secondary Crushing and Ore Storage: Added operational conditions. <i>No change in emissions.</i>
003	<u>Raw Material Reclaiming, Grinding & Storage</u> : Added equipment and operational conditions compliance testing requirements. <i>PTE ton/yr Increase: PM₁₀-1.29.</i>
005	<u>Petroleum Coke Fuel System</u> : Added operational conditions. <i>PTE ton/yr Increase: PM₁₀-0.53.</i>
009	<u>Gypsum Truck Off-Loading Operation</u> : Added Outdoor Gypsum Storage Pile. <i>PTE ton/yr Increase: PM₁₀-0.64.</i>
018	<u>Gasoline Storage & Dispensing System</u> : Revised equipment description Added operational conditions and revised special conditions. <i>No change in emissions.</i>
025	<u>Emergency Use Piston Engine with Generator Set</u> : Revised equipment description Added operational conditions. <i>No change in emissions.</i>

<u>Equipment Unit</u>	<u>Description</u>
026	<u>Emergency Generator Set</u> : Revised equipment and added operating conditions. <i>No change in emissions.</i>
036	<u>Cement Finish Mill #3</u> : Removed one operational condition and added one special condition. . No change in emissions. <i>PTE ton/yr Reduction: PM₁₀-27.48.</i>
040	<u>Secondary Alternate Fuels Receiving/Handling System</u> : Added one operational condition. PTE ton/yr limit added: <i>PM₁₀-0.04.</i>
042	<u>Preheater/Precalciner Cement Kiln System</u> : Revised equipment descriptions and added equipment, added operating conditions, and added special conditions. <i>Added 194.12 lb/day Ammonia Slip emissions from SNCR ammonia injection, Reduction: PM₁₀-3.7, NO_x-1,007.4.</i>

C. Removed Units

<u>Equipment Unit</u>	<u>Description</u>
019	<u>Piston Engine with Air Compressor</u> : (195-bhp diesel engine, powering portable air compressor). <i>PTE ton/yr removed: PM₁₀-0.22, SO₂-0.04, NO₂-3.07, VOC-0.05, CO-109.9</i>
020	<u>Piston Engine with Air Compressor</u> : (195-bhp diesel engine, powering portable air compressor). <i>PTE ton/yr removed: PM₁₀-0.22, SO₂-0.04, NO₂-3.07, VOC-0.05, CO-109.9</i>
041	<u>Truck-Mounted Vacuum</u> : (Industrial vacuum loader including 5,300 cfm vacuum blower and baghouse and vacuum recovery cleaning mechanism). <i>PTE ton/yr removed: PM₁₀-1.46.</i>

IX. COMPLIANCE

A summary of Violations filed against National Cement because on non-compliance and Variances filed by National Cement to maintain compliance are summarized below.

A. Notice of Violation (NOV)

2018 Violations

None

2019 Violations

None

2020 Violations

None

2021 Violations

None

2022 Violations

None

2023 Violations

None

B. Variance

2018 Variances

None

2019 Variances

<u>Hearing Date</u>	<u>Completion Date</u>	<u>Operation Requiring Variance</u>	<u>Variance Number</u>
3/15/19	3/29/19	Mercury (Hg) CEMS	19-01(E)
8/22/19	9/6/19	NOx CEMS	19-02(E)

2020 Variances

None

2021 Variances

None

2022 Variances

None

2023 Variances

<u>Hearing Date</u>	<u>Completion Date</u>	<u>Operation Requiring Variance</u>	<u>Variance Number</u>
3/29/23	3/26/23	PTO 1128006R Conditions 11 & 12 covered clinker storage load out.	23-02(E)

C. Breakdown

2018 Occurrences

<u>Date</u>	<u>Equipment Involved</u>	<u>Permit #</u>
1/30/18	High main baghouse inlet temp.	1128042
2/21/18	High main baghouse inlet temp.	1128042
3/19/18	High main baghouse inlet temp.	1128042
6/14/18	Global emission at start up.	1128042
8/16/18	Kiln. CO and NOx "issues"	1128042
8/20/18	Kiln	1128042
9/07/18	KILN	1128042
10/10/18	KILN	1128042
10/30/18	Kiln @ Center of plant	1128042
11/1/18	Kiln @ Center of plant	1128042
11/2/18	FINISH SILO	1128010
11/9/18	Kiln @ Center of plant (7:25AM)	1128042
11/9/18	Kiln @ Center of plant (2:30PM)	1128042
11/28/18	Kiln - EXPERIMENTAL EXEMPTION	1128042

2019 Occurrences

<u>Date</u>	<u>Equipment Involved</u>	<u>Permit #</u>
1/7/19	CLINKER STACKER	1102006
2/3/19	Kiln	1128042
2/4/19	Kiln	1128042
2/17/19	Emissions reporting is broken.	1128042
4/5/19	Kiln	1128042
6/5/19	Kiln	1128042
6/20/19	Kiln	1128042

7/19/19	Kiln	1128042
8/22/19	Kiln	1128042
9/4/19	Kiln	1128042
9/24/19	Kiln	1128042
11/5/19	Coke Mill	1128005

2020 Occurrences

<u>Date</u>	<u>Equipment Involved</u>	<u>Permit #</u>
1/23/20	Kiln	1128042
3/2/20	NOx analyzer for kiln	1128042
4/7/20	Kiln / THC Analyzer	1128042
4/16/20	Kiln / 41-FA12	1128042
4/29/20	Kiln	1128042
5/2/20	Kiln	1128042
5/8/20	Coke Mill	1128005
6/4/20	Kiln Center of Plant	1128042
6/24/20	Kiln Center of Plant	1128042
7/7/20	Baghouse	1128042
7/28/20	Kiln @ Center of Plant	1128042
8/8/20	Kiln at center of plant	1128042
8/14-16/20	Kiln at center of plant	1128042
8/29/20	Kiln - alarm on CEM	1128042
9/1/20	Kiln - 42 SAN 12	1128042
9/1/20	Kiln - THC CEM	1128042
9/7/20	Kiln - High Sox	1128042
10/17/20	Kiln CO analyzer	1128042

10/17/20	Kiln 41 SAN 12 tripped	1128042
12/17/20	Kiln High NOx emissions	1128042

2021 Occurrences

<u>Date</u>	<u>Equipment Involved</u>	<u>Permit #</u>
1/13/21	Kiln thermocouple	1128042
1/21/21	Kiln Nox analyzer	1128042
1/31/21	Kiln Sox analyzer	1128042
3/22/21	Kiln	1128042
4/10/21	Kiln	1128042
4/24/21	Kiln	1128042
5/1/21	Kiln	1128042
5/19/21	Kiln	1128042
5/26/21	Kiln	1128042
6/1/21	Kiln	1128042
7/9/21	Kiln	1128042
8/27/21	Kiln	1128042
8/30/21	Kiln	1128042

2022 Occurrences

<u>Date</u>	<u>Equipment Involved</u>	<u>Permit #</u>
1/7/22	Baghouse ID Fan # 15	1128042
2/7/22	Kiln	1128042
2/23/22	Kiln	1128042
4/25/22	Kiln	1128042
5/20/22	Kiln	1128042
6/15/22	Kiln	1128042
6/24/22	Kiln	1128042

6/27/22	Finish Mill #1	1128007
7/18/22	Kiln	1128042
8/31/22	Kiln	1128042
8/31/22	Kiln	1128042
9/1/22	Kiln	1128042
9/1/22	Kiln	1128042
9/5/22	Kiln	1128042
9/6/22	Kiln	1128042
9/07/22	Kiln	1128042
11/28/22	Clinker Conveyance System	1128006
11/30/22	Kiln	1128042
12/26/22	Finish Mill #1	1128007

2023 Occurrences

<u>Date</u>	<u>Equipment Involved</u>	<u>Permit #</u>
1/15/23	Kiln	1128042
3/21/23	Conveyers	1128042
5/26/23	Clinker Storage	1128006
8/16/23	Dust Collector	1128007
8/20/23	48i CO and 42C Nox Monitoring Devices	1128042

X. MONITORING AND RECORDKEEPING

A. Monitoring and Recordkeeping Requirements

National Cement shall conduct routine inspections on all required control equipment. The following monitoring procedures will be used.

1. Conduct daily visual observations of emission control equipment (excluding kiln and cooler stacks) (Visual observations will be conducted by employees pursuant to standard instructions and reporting procedures.):

- a. If visual observations detect emissions, conduct EPA Method 22 (opacity/visual emissions readings);
 - b. If visual emissions are confirmed by EPA Method 22, conduct EPA Method 9 (6 minute visual emissions readings) as soon as practicable; and
 - c. Record results of EPA Method 9 compliance monitoring.
2. Conduct semi-annual visible emissions survey EPA Method 22 (excluding kiln and cooler stacks) on all control equipment. Record results for compliance monitoring;
 3. Kiln and clinker cooler exhaust stacks will be equipped with continuous monitors/recorders for opacity;
 4. Kiln exhaust stack will be equipped with continuous monitors/recorders for nitrogen oxides;
 5. Diesel engines listed in this permit will be fired on diesel fuel with sulfur content not to exceed 0.05%;
 6. Comply with all applicable opacity and PM limits as specified in 40 CFR 60, Subpart F;
 7. Opacity monitor (CEM.) will be calibrated, maintained, and operated as directed in 40 CFR 60, Subpart F;
 8. Develop and maintain a Startup, Shutdown, and Malfunction Plan as required by 40 CFR Part 63, Subpart A;
 9. Comply with all applicable monitoring requirements of 40 CFR Part 63, Subpart LLL;
 10. Develop and maintain an Operations and Maintenance Plan as required by 40 CFR Part 63, Subpart LLL; and
 11. Comply with monitoring, installation, collection, operation, maintenance notification, reporting, and record requirements of 40 CFR 63, Subpart ZZZZ.

B. Additional Recordkeeping Requirements

1. Recording of maintenance of all monitoring and support information associated with all permit streamlining requirements imposed in accordance with Rule 201.1, Subsection V.J., all District-only rules which apply in accordance with Rule 201.1, Subsection V.K.1., and all applicable federal requirement not submitted by such permit streamlining requirement(s) or District-only rules, including:

- a. Date, place, and time of sampling;
 - b. Operating conditions at time of sampling;
 - c. Date, place, and method of analysis; and
 - d. Results of analysis;
2. Retention of records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application; and
 3. Any other recordkeeping deemed necessary by the APCO to ensure compliance with all permit streamlining requirements imposed in accordance with Rule 201.1, Subsection V.J., all District-only rules which apply in accordance with Rule 201.1, Subsection V.K.1., and all applicable federal requirements not subsumed by such permit streamlining requirement(s) or District-only rules.

C. Compliance Assurance Monitoring (CAM) Requirements

In accordance with 40 CFR Part 64 Section 64.2,(b)(i), packhouse, loading operation, pyroprocessing, and clinker cooler are all emissions units subject to Section 112 (National Emission Standards for Hazardous Air Pollutants) of the Clean Air Act proposed after 1990 (specifically 40 CFR Part 63, Subpart LLL, adopted June 1999). Therefore, CAM plan is not required.

This facility does not use coal in its production, therefore 40 CFR 60, Subpart Y is not applicable.

D. Periodic Monitoring Requirements

The Title V permit includes periodic monitoring requirements sufficient to yield reliable data from the relevant time period(s) that are representative of the source's compliance with the permit (40 CFR 70.6(a)(3)), and includes provisions sufficient to assure compliance with the terms and conditions of the permit (40 CFR 70.6(c)(1)).

XI. REPORTING REQUIREMENTS

- A. Any non-conformance with permit requirements, including any attributable to emergency conditions (as defined in Rule 201.1) will be promptly reported to the APCO and in accordance with Rule 111;
- B. Monitoring report will be submitted at least every six months identifying any non-conformance with permit requirements, including any previously reported to the APCO;
- C. All reports of non-conformance with permit requirements will include probable cause of non-conformance and any preventative or corrective action taken;
- D. Progress report will be made on a compliance schedule at least semi-annually and including:

1. Date when compliance will be achieved;
 2. Explanation of why compliance was not, or will not be achieved by the scheduled date; and
 3. Log of any preventative or corrective action taken; and
- E. Each monitoring report will be accompanied by a written statement from the responsible official certifying the truth, accuracy, and completeness of the report.

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