



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

RE: PERMIT TO INSTALL MODIFICATION  
GREENE COUNTY  
Application No: 08-03072

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
X	NSPS
	NESHAPS
Y	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 8/15/2000

Southdown Inc  
Daniel Peters  
3250 Linebaugh Rd  
Fairborn, OH 453850000

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

RAPCA



## ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-03072

Application Number: **08-03072**APS Premise Number: **0829700165**Permit Fee: **\$1800**Name of Facility: **Southdown Inc**Person to Contact: **Daniel Peters**Address: **3250 Linebaugh Rd  
Fairborn, OH 453850000**

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3250 Linebaugh Rd  
Xenia, OHIO**

Description of modification:

**Modification of PTI 08-3072, originally issued 5/19/95 for Portland cement plant; raw & finish mill systems; raw material & clinker storage; conveyors; bulk load/unload.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

2 of 19 Pages

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

**GENERAL PERMIT CONDITIONS**

**TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

**CONSTRUCTION OF NEW SOURCES**

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

3 of 19 Pages

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

**PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

**PUBLIC DISCLOSURE**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

**APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

4 of 19 Pages

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

**BEST AVAILABLE TECHNOLOGY**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

**SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations and policies.

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for **SOUTHDOWN INC.DBA SW PORTLAND CEMENT CO** located in **Greene** County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
P911	Raw Material Unloading and Storage	*	3745-31-05 3745-17-07 3745-17-11 40 CFR Part 60, Subpart F	0.020 gr/dscf; 1.02 lbs/hr, 24.49 lbs/day, 4.47 TPY particulate emissions; <b>fugitive dust:</b> 5% VE opacity, as a 3 minute average <b>stack:</b> 5% VE opacity, as a 3 minute average
P912	Clinker Dome Storage	*	3745-31-05 3745-17-07 3745-17-11 40 CFR Part 60, Subpart F	0.020 gr/dscf; 3.95 lbs/hr, 94.90 lbs/day, 17.32 TPY particulate emissions; <b>fugitive dust:</b> 5% VE opacity, as a 3 minute average <b>stack:</b> 5% VE opacity, as a 3 minute average
P913	Clinker Bin Storage	*	3745-31-05 3745-17-07 3745-17-11 40 CFR Part 60, Subpart F	0.020 gr/dscf; 3.01 lbs/hr, 72.27 lbs/day, 13.19 TPY particulate emissions;

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
				<b>fugitive dust:</b> 5% VE opacity, as a 3 minute average <b>stack:</b> 5% VE opacity, as a 3 minute average
P914	Feed Bin Extraction	*	3745-31-05 3745-17-07 3745-17-11 40 CFR Part 60, Subpart F	0.020 gr/dscf; 3.19 lbs/hr, 76.66 lbs/day, 13.99 TPY particulate emissions; <b>fugitive dust:</b> 5% VE opacity, as a 3 minute average <b>stack:</b> 5% VE opacity, as a 3 minute average
P915	Lime Storage and Transport	*	3745-31-05 3745-17-07 3745-17-11 40 CFR Part 60, Subpart F	0.020 gr/dscf, 0.26 lb/hr, 6.19 lbs/day, 1.13 TPY particulate emissions; <b>fugitive dust:</b> 5% VE opacity, as a 3 minute average <b>stack:</b> 5% VE opacity, as a 3 minute average
P916	Finish Mill Grinding; Ball Mill and Separator	*	3745-31-05 3745-17-07 3745-17-11 40 CFR Part 60, Subpart F	0.020 gr/dscf, 26.38 lbs/hr, 633.10 lbs/day, 115.54 TPY particulate emissions; fugitive dust and

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P917	Cement Transport; Finish Mill to Silo	*	3745-31-05 3745-17-07 3745-17-11 40 CFR Part 60, Subpart F	<b>stack:</b> 10% VE opacity, as a 6 minute average  0.020 gr/dscf, 1.61 lbs/hr, 38.52 lbs/day, 7.03 TPY particulate emissions; <b>fugitive dust:</b> 5% VE opacity, as a 3 minute average <b>stack:</b> 5% VE opacity, as a 3 minute average
P918	Cement Storage in Silos	*	3745-31-05 3745-17-07 3745-17-11 40 CFR Part 60, Subpart F	0.020 gr/dscf, 1.75 lbs/hr, 42.08 lbs/day, 7.68 TPY particulate emissions; <b>fugitive dust:</b> 5% VE opacity, as a 3 minute average <b>stack:</b> 5% VE opacity, as a 3 minute average
P919	Bulk Cement Loading	*	3745-31-05 3745-17-07 3745-17-11 40 CFR Part 60, Subpart F	0.020 gr/dscf, 1.40 lbs/hr, 33.59 lbs/day, 6.13 TPY particulate emissions; <b>fugitive dust:</b> 5% VE opacity, as a 3 minute average <b>stack:</b> 5% VE

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
---------------------------------	------------------------------------	----------------------	-----------------------------------	--

opacity, as a 3  
minute average

\* Compliance with the specified allowable emission rates through the covering or enclosing of each emission unit, and through the application of dust collectors at strategic locations and silo vents for emission units P911-P915 and P917-P919, and through the application of baghouse emission control for emission unit P916; capture of fugitive particulate emissions from emission unit P911-P919 to the fullest extent possible to minimize or eliminate visible fugitive emissions, recordkeeping; reporting; reporting; PM & MAP.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate Matter	186.48

**NSPS REQUIREMENTS**

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P911	Raw Material Unloading and Storage	F
P912	Clinker Dome Storage	F
P913	Clinker Bin Storage	F
P914	Feed Bin Extraction	F
P915	Lime Storage and Transport	F

9 of 19 Pages

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

P916	Finish Mill Grinding	F
P917	Cement Transport (Finish Mill to Silos)	F
P918	Cement Storage in Silos	F
P919	Bulk Cement Loading	F

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Air Quality Modeling and Planning  
P.O. Box 1049  
Columbus, OH 43216-1049

and Regional Air Pollution Control  
451 West Third Street  
Dayton, Ohio 45422

#### **PERFORMANCE TEST REQUIREMENTS**

The permittee shall conduct, or have conducted, performance testing on the air contaminant source(s) in accordance with procedures approved by the Agency. Two copies of the written report describing the test procedures followed and the results of such tests shall be submitted and signed by the person responsible for the test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

- A. A completed Intent to Test form shall be submitted to the appropriate Ohio EPA District Office or Local Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the source operating parameters, the proposed test procedures, and the time, date, place and person(s) conducting such tests.
- B. Two copies of the test results shall be submitted within 30 days after the completion of the performance test.
- C. Tests shall be performed for the following source(s) and pollutants(s):

**Source**

**Pollutant(s)**

**P916**

**Particulate Matter**

**RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

11 of 19 Pages

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

**MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

**AIR POLLUTION NUISANCES PROHIBITED**

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

**CONSTRUCTION COMPLIANCE CERTIFICATION**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

1. Emission Unit Identification and Description:

The Ohio EPA emissions units identified within this permit are comprised of the following equipment:

A. P911 - Raw Material Unloading and Storage (covered conveyor)

K352 hopper  
K303 feed bin  
K304 feed bin  
K362 dust collector  
K371 dust collector  
K355 vibratory feeder  
K122 belt conveyor

B. P912 - Clinker Dome Storage (totally enclosed)

F109 pan conveyor  
F111 clinker dome  
F107 dust collector  
F117 dust collector  
F124 dust collector

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

C. P913 - Clinker Bin Storage (covered conveyors)

K108 belt conveyor  
K301 feed bin  
K302 feed bin  
K121 belt conveyor  
K112 dust collector  
K107 dust collector  
K109 dust collector  
F119A belt conveyor  
K110 bucket elevator  
F133 dust collector

D. P914 - Feed Bin Extraction (covered conveyor)

K331 belt conveyor (feeder to K401)  
K332 belt conveyor (feeder to K401)  
K333 belt conveyor (feeder to K401)  
K334 belt conveyor (feeder to K401)  
K411 dust collector  
K412 dust collector  
K413 dust collector

E. P915 - Lime Storage and Transport (covered conveyor)

K305 lime storage silo  
K315 dust collector

F. P916 - Finish Mill Grinding; Ball Mill and Separator (feed end covered and discharge end enclosed)

K501 ball mill  
K521 airslide conveyor  
K522 mill bucket elevator  
K525 airslide conveyor  
K531 separator  
K535 airslide conveyor  
K516 screw conveyor  
K560 airslide conveyor  
K551 airslide conveyor  
K552 airslide conveyor  
K511 mill baghouse  
K541 separator baghouse I  
K542 separator baghouse II  
K571 fringe bin  
K577 screw conveyor  
K581 bulk loadout spout  
K580 airslide conveyor  
K576 dust collector  
K523 dust collector

G. P917 - Cement Transport (mill to silos, pneumatically conveyed and enclosed)

K565 airslide conveyor

L201 bucket elevator

L215 airslide conveyor

K205 dust collector

L206 dust collector

H. P918 - Cement Storage in Silos (pneumatically conveyed and enclosed)

L301 cement silo

L302 cement silo

L303 cement silo

L304 cement silo

L305 cement silo

L306 cement silo

L307 cement silo

L308 cement silo

L221A airslide conveyor

L222A airslide conveyor

L223A airslide conveyor

L224A airslide conveyor

L225A airslide conveyor

L226A airslide conveyor

L227A airslide conveyor

L228A airslide conveyor

L211 dust collector

I. P919 - bulk Cement Loading (pneumatically conveyed and enclosed)

L321A airslide conveyor

L322A airslide conveyor

L323A airslide conveyor

L324A airslide conveyor

L325A airslide conveyor

L326A airslide conveyor

L331A airslide conveyor

L332A airslide conveyor

L401 loading spout

L402 loading spout

L411 dust collector

L412 dust collector

2. Point Source Allowable Emission Rates:

A. Each fabric filter dust collection system shall achieve an outlet emission rate of not greater than 0.020 grains of particulate per dry standard cubic foot (gr/dscf) of exhaust gases. The stack visible emissions from emission unit P916 shall not exceed 10% opacity, as a six minute average. The visible emissions from the collector outlets of emission units P911-P915 and P917-P919 shall not exceed 5% opacity, as a three minute average, per USEPA Reference Method 9.

B. The allowable point source mass emission rates for the emission units P911-P919 are based on 0.020 grains per dry standard cubic foot (gr/dscf).

C. Performance testing is required for emission units P911-P919 to demonstrate compliance with the requirements of this permit. As an alternative to performance testing emission units P911-P915 and P917-P919 for compliance demonstration, each unit shall be evaluated for visible emissions (VE) from each dust collector, in accordance with U.S. EPA reference test method No. 9. Each initial (and subsequent annual) VE evaluation shall consist of no less than 60 readings, taken consecutively at 15 second intervals. (VE evaluations conducted in addition to the initial and subsequent annual evaluations may be for periods of time less than 0.5 hour.)

A 5% or less visible emissions opacity reading, as a three minute average, from each dust collector shall be viewed as full compliance with the point source emission requirements for emission unit P911-P915 and P917-P919.

D. In the event visible emissions are determined to be greater than 5% opacity, as a three minute average, during any VE evaluation, the permittee shall within one (1) hour of the VE evaluation, inspect the subject emission control device for any malfunction and implement corrective measures accordingly. If the problem is not easily resolvable, the permittee shall have five (5) days to bring in a manufacturer's representative to evaluate and remedy the situation.

Upon completion of the inspection and any corrective measures (five days maximum), a follow up VE evaluation shall be conducted. If the visible emissions are determined to be greater than 5% opacity, as a three minute average, during any such follow up evaluation, the permittee shall conduct, or have conducted performance testing in accordance with procedures approved by the Agency. A copy of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

and the results of such test. The Director, or an Ohio EPA representative, shall be allowed to witness the test, examine testing equipment, and require the acquisition or submission of data and information necessary to assure that the emission unit operation and testing procedures provide a valid characterization of the emissions from the emission unit and/or the performance of the control equipment.

i. A completed Intent to Test form shall be submitted to the Regional Air Pollution Control Agency where the original permit application was filed. This notice shall be made 30 days in advance and shall specify the emission unit operating parameters, the proposed test procedures and the time, date, place, and person(s) conducting such tests.

ii. A copy of the test results shall be submitted within 30 days after the completion of the performance test.

E. Upon the initial demonstration of compliance for emission units P911-P915 and P917-P919, with the 5% visible emission opacity as a three minute average, an annual VE compliance demonstration shall be required (Ref: paragraph 2.C. above).

3. Process Fugitive Dust Mass Emission Rates and Visible Emission Limits

For the emission units identified as P911 through P919, the process fugitive dust emissions are estimates based upon AP-42 emission factors and engineering estimates. Pursuant to the Ohio best available technology requirements in OAC 3745-31-05(A)(3), the acceptable level of process fugitive dust emissions is based upon OAC 3745-17-08(B)(3)(a), which requires the visible particulate emissions of fugitive dust be minimized or eliminated at the point of capture, to the extent possible with good engineering design. Pursuant to Ohio best available technology requirements, compliance with the mass fugitive emissions values shall be presumed provided visible particulate emissions of fugitive dust are maintained at or below 5% opacity, as a three minute average, for emissions units P911-P915 and P917-P919, and below 10% opacity, as a six minute average, for emissions unit P916, in accordance with USEPA Reference Test Method 9.

4. Cement Production Limit:

A. This facility shall not exceed an annual cement (finished product) production limit of 1,105,104 tons/year, based on 365 day rolling block periods, (e.g., June 1, 1995 to June 1, 1996; June 2, 1995 to June 2, 1996; etc.).

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

- B. During the first year of operation, this facility shall be limited to the following production limits:

<u>Month</u>	<u>Maximum Protection</u>
1-6	552,552 tons
1-7	644,644 tons
1-8	736,736 tons
1-9	828,828 tons
1-10	920,920 tons
1-11	1,013,012 tons
1-12	1,105,104 tons

5. Recordkeeping:

This facility shall maintain daily records of the cement (finished product) production in tons, in order to demonstrate compliance with the 365 day rolling block limit of 1,105,104 tons/year cement production.

6. Reporting

This facility shall submit quarterly reports to the Regional Air Pollution Control Agency which summarizes the following:

- i. the total production (finished product) in tons for each month; and,
- ii. the identification of any daily record which shows an exceedance of the rolling 365 day block production limit.

These reports shall be due April 15, July 15, October 15 and January 15, and shall cover the previous three calendar months.

7. Air Pollution Control Requirements

- A. This facility shall install, operate and maintain fabric filter dust collection systems at all material transfer points. The fabric filter dust collection system associated with emission unit P916 shall be designed to achieve 99.9% collector efficiency.
- B. Each emission unit shall be covered or enclosed and operated such that, the emissions are minimized to the fullest extent possible.

8. Emission Unit Decommissioning Requirement:

- A. This PTI issued based in part on the permanent decommissioning of the existing emission units identified below. The emission credits from the emission units to be decommissioned are as follows:

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

<u>Emission Unit ID</u>	<u>Emission Unit Description</u>	<u>Credit (TPY)</u>	
		<u>Point</u>	<u>Fugitive</u>
0829060018 P901	Ball Mills-Finish Mills, Nos. 1,2,4 and 5 (North Mills)	28.27	42.31
0829060018 P902	Ball Mills-Finish Mills, Nos. 7 and 8 (South Mills)	37.31	60.66
0829060018 F001	Raw Material Handling and Transport	51.25	214.51
0829700165 P905	Clinker Conveyors and } Storage	21.19	12.65
0829700165 P910	Clinker Loadout }	_____	_____
Total Emissions Credit in TPY		138.02	+ 330.13 =
		468.15	

B. As of the commissioning date of the new Quarry Plant Finish Mill System (Premises No. 0829700165), the applicant shall cease the transportation of clinker feed to the Town Plant (Premises No. 0829060018) for grinding.

C. Within ninety (90) days of the commissioning date, the Town Plant will complete grinding operations of the clinker inventory remaining at the Town Plant and retire (decommission) the emission units identified above from service.

D. For purposes of this permit the "commissioning date" shall be defined as follows:

the date which the new Finish Mill system at the Quarry Plant has been performance tested and has demonstrated compliance.

9. Contemporaneous Emission Increases and Decreases:

The installations at the Quarry Plant (0829700165) of the new finish grinding mill covered by this PTI 08-3072 are the emission increases from the proposed modification. The clinker handling operation covered by PTI 08-2136, issued September 26, 1990 are the contemporaneous emission increases that have occurred in the last 5 years. The concurrent shutdown of the old finish grinding mill at the Town Plant (0829060018) are the contemporaneous emission decreases. The following outlines the overall net emissions change.

Facility Name: SOUTHDOWN INC., D.B.A. SOUTHWESTERN PORTLAND CEMENT CO.

Application Number: 08-3072

Date: August 15, 2000

Emission Increases from Proposed Modifications	+186.48
Source-Wide Creditable Contemporaneous Decreases	-468.15
Source-Wide Creditable Contemporaneous Increases	+ 15.70
	<hr/>
Net Emissions Change	-265.97

With the installation of the new emission units identified within PTI 08-3072 and 08-2136, along with the permanent shutdown of emission units 0829060018: P901, P902, F001 and 0829700165: P905 and P910, there will be no net increase in the particulate matter emissions.

10. Performance Test Requirement for the Existing Emission Units:

In order to verify the emission credits from emission units P901 and P902 which are to be permanently decommissioned, this facility shall within ninety (90) days of the issuance of PTI 08-3072, conduct or have conducted, performance testing on the emission units to be decommissioned in accordance with procedures approved by the Agency. A copy of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director or Ohio EPA representative shall be allowed to witness the tests, examine testing equipment and require the acquisition or submission of data and information necessary to assure that the emission units operation and testing procedures provide a valid characterization of the emissions from the emission unit and/or the performance of the control equipment.

A. A completed Intent to Test form shall be submitted to the Regional Air Pollution Control Agency. This notice shall be made thirty (30) days in advance and shall specify the source operating parameters, the proposed test procedures and the time, date, place and person(s) conducting such tests.

B. A copy of the test results shall be submitted within thirty (30) days after the completion of the performance test.

11. Preventative Maintenance and Malfunction Abatement Plan:

This facility shall implement a Preventative Maintenance and Malfunction Abatement Plan (PM & MAP) for each emission unit and its associated fabric filter dust collection system. Such a PM & MAP shall outline the specific steps taken and/or the specific items checked on a routine basis to ensure optimum operation of each fabric filter dust collection system. The PM & MAP for emission units P911-P919 shall be in writing and shall be submitted to the Regional Air Pollution Control Agency, in conjunction with the permit to operate applications required in the Ohio Administrative Code (OAC) 3745-35-02(B)(5), no later than 30 days after commencement of operation.

The PM & MAP shall include, but is not limited to, the following:

- A. the installation, operation and maintenance of a leak detection system on the fabric filter emission control system associated with emission unit P916;
- B. the installation, operation and maintenance of either a leak detection system or equipment to continuously monitor the pressure drop across the fabric filters (dust collectors) controlling the emissions from emission units P918 and P919;
- C. routine fabric filter inspections to prevent failures; and,
- D. at a minimum, the maintenance of a 10% replacement bag inventory for the largest compartment of each type of fabric filter dust collection system.