

CEDAR HEIGHTS CLAY, PLANT #2
0640010011 P001, P002, & P003
SYNTHETIC MINOR DETERMINATION

Source Description : Cedar Heights Clay, Plant #2, emission unit P001 is a 10.0 TPH Raymond #5 Roll Mill which was constructed approximately in 1966 and did not require a PTI. Similarly, emission unit P002, Prater Hammermill #2, was constructed approximately in 1963 and emission unit P003, McDermott Clay Dryer, in 1958 which also did not require a PTI.

Facility Emission Attainment Status : Cedar Heights Clay, Plant #2, has the potential to emit more than 100 TPY particulate, but voluntary production and operation restrictions will reduce Cedar Heights Clay, Plant #2 PTE to 75.73 TPY total. Jackson County is designated as attainment for particulate.

Source New Emissions : The facilities potential emissions (based on current allowable rates at 8760 hours per year) are 327.85 TPY which triggers Title V Permitting requirements. Cedar Heights Clay has requested restrictions be incorporated into their operating permit(s) which will reduce their potential particulate emissions to less than 100 TPY and thereby, avoid Title V permitting requirements. The affected permits to operate will contain terms and conditions to limit Cedar Heights Clay, Plant #2, to 75.73 TPY total particulate emissions over a rolling 12-month period and require recording of the total monthly and calculated rolling 12-month production (tons of material processed) totals and recording of the total monthly and rolling 12-month period of hours of operation per emission unit.

Conclusion : The terms and conditions in the Permits to Operate, will limit Cedar Heights Clay, Plant #2 to less than 75.73 TPY total particulate emissions over a rolling 12-month period. The terms and conditions contained in the Permits to Operate have short term restrictions for #/hr allowable emissions , total hours operated and tons of material processed. The terms and conditions for long term restrictions are TPY allowable emissions, total rolling 12-month period of hours operated and total rolling 12-month period of tons of material processed, so the permit(s) will be federally enforceable once issued.

Cedar Heights Clay shall maintain a monthly log of total tons of material processed and total hours of operation per emission unit for each month and each consecutive 12-month period.

Semiannual reports will be required to assure compliance. The facilities potential to emit (PTE) particulate emissions will be less than the Title V - 100 TPY requirement and therefore will not be subject to Title V permitting requirements.