

Bay Area Air Quality Management District
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**Permit Evaluation
and
Statement of Basis
for
RENEWAL of

MAJOR FACILITY REVIEW PERMIT

for
Lehigh Southwest Cement Company
Facility #A0017**

Facility Address:
24001 Stevens Creek Boulevard
Cupertino, CA 95014

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Application: 17947

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Title V Statement of Basis

A. Background

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the “potential to emit” (as defined by BAAQMD Regulation 2-6-218) more than 100 tons per year of a regulated air pollutant.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR, Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all “applicable requirements” (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

Pursuant to Regulation 2, Rule 6, section 416, the District has reviewed the terms and conditions of this Major Facility Review permit and determined that they are still valid and correct. This review included an analysis of applicability determinations for all sources, including those that have been modified or permitted since the issuance of the initial Major Facility Review Permit. The review also included an assessment of all monitoring in the permit for sufficiency to determine compliance. The statement of basis documents for permit revisions that have occurred since the initial Major Facility Review permit was issued are hereby incorporated by reference and are available upon request.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility identifier that consists of a letter and a 4-digit number. This identifier is also considered to be the identifier for the permit. The identifier for this facility is A0017.

This facility received its initial Title V permit on November 5, 2003. This application is for a permit renewal. Although the current permit expired on October 31, 2008, it continues in force until the District takes final action on the permit renewal. The standard sections of the permit have been updated to include new standard language used in all Title V permits. The proposed permit shows all changes to the permit in strikeout/underline format.

On May 9, 2006, the District issued a Minor Title V revision under Application # 9687, which included the following:

- Update capacities in Table II-A based on updated documentation from plant
- Add reactivated Roll Press Clinker Surge Bin and Feeder S-21 to Title V permit
- Add existing Quarry Blasting and Mobile Operations S-600 to Title V permit
- Add new Finish Mill Building Conveyor S-415 to Title V permit
- Remove Schedule of Compliance with the installation of updated Bag Leak Detection Systems
- Update tables for S-1 Gasoline Station for EPA approved BAAQMD Regulation 8-7 instead of the SIP Regulation 8-7

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- Update version dates for newly modified regulations
- Update tables and permit conditions to reflect the additions of permitted equipment.

On February 25, 2008, the District proposed a Minor Title V revision under Application # 16867 for (1) adding an emergency clinker conveyor (S-444, 230 tons per hour, abated by a water spray) as a separate source, having been originally considered part of the clinker transfer area (S-17) and clinker transfer system (S-165); (2) correct the Title V permit to reflect the current updated sources, and (3) to modify condition 603, part 2 to increase its allowable coke usage from 8 tons per hour to 20 tons per hour. The coke is used as fuel for the S-154 Precalciner Kiln for cement clinker production.

On October 31, 2008, at the request of EPA Region IX, Lehigh submitted a demonstration that the fuel change project did not trigger federal PSD permit requirements. EPA has not yet finalized their review of this submittal.

This Title V renewal includes the following applications:

Application Number(s) (Title V/New Source Review (NSR))	Description
NSR 15216	Emission Reduction Credit application for the shut down of Mineral Aggregate Plant sources 204 through 206, 215, 440 through 443.
16867/15217	Addition of existing S-444 Emergency Clinker Conveyor and its abatement by A-444 Water Spray
16867/15398	HPC has submitted a change in permit condition for the following sources: S-173 Kiln Coke System abated by A-175 Dust Collector S-174 Precalciner Coke System abated by A-174 Dust Collector HPC is applying to modify condition 603, part 2 to increase its allowable coke usage from 8 tons per hour to 20 tons per hour. The coke is used as fuel for the S-154 Precalciner Kiln for cement clinker production.
17734/15342	Addition of S-100 Precalciner Kiln Fuel Handling System and its abatement by A-100 Water Sprays
NSR 15572	Relocation of Crusher (S-202); Relocation and renumbering of Vibrating Screen S-203 to S-604 abated by A-4502 Baghouse; Replacement of Primary Crusher S-201 with S-605 Primary Crusher abated by A-4503 Baghouse; Permit existing sources S-601 Hopper abated by water spray A-4501, S-602 Conveyor System abated by A-4502, A-4503, A-4504 Baghouses, and S-603 Vibrating Grizzly abated by A-4503 Baghouse
NSR 17534	Replacement of existing abatement devices (A-216, A-221, A-242)
NSR 18535	Condition change on toxics limits
NSR 19385	Addition of existing source S-606 Storage Piles (Area 1) abated by A-606 Water Spray and new source S-607 Storage Piles (Area 2) abated by A-607 Water Spray
NSR 20199	EVR upgrade per CARB requirement

All of the above applications are minor modifications and administrative changes that correct and reflect Lehigh operations such as equipment shut down, relocating crushers, replacing and adding baghouses, correcting toxics limits, and adding new sources. None of the above applications resulted in

emissions increases with the exception of NSR Application 15217/TV 16867 where there was a small PM10 increase from an existing conveyor and Application NSR Application 19385 where there was a small PM10 increase due to outdoor storage piles (aggregate/slag). Furthermore, the revisions do not involve a relaxation of any applicable monitoring, reporting, or recordkeeping condition.

- NSR Application 15216 was to bank emission reduction credits for the shut down of the mineral aggregate plant (S-204 through 206, 215, 440 through 443). No emission increase or addition of any new requirements from this administrative amendment.
- NSR Application 15217/TV 16867 was to add an existing conveyor (S-444 Emergency Clinker Conveyor abated by A-444 Water Sprays) that was not previously identified as a separate source. Condition # 23416 was added to S-444. There was an increase of 0.012 ton/year of PM10 emissions from this minor revision and Lehigh used emission reduction credits (ERCs) to offset the increase.
- NSR Application 15342/TV 17734 was to add two hoppers and a conveyor system (S-100 Precalciner Kiln Fuel Handling System abated by A-100 Water Sprays) for fuel and additive handling. Condition # 23942 was added to S-100. No emission increase resulted from this minor revision.
- NSR 15572 was to replace a jaw crusher (S-201) with a new jaw crusher (S-605), add a baghouse on an existing cone crusher (S-202), and add the following existing grandfathered sources:
 - S-601 Rock Hopper (9-DH-1) abated by Water Spray A-4501
 - S-602 Conveyor System (9-PAF-1, 9-BC-1, 9-BC-2) abated by Torit Shaking Baghouse Filters A-4502, A-4503, A-4504
 - S-603 Vibrating Grizzly (9-VG-1) abated by Torit Shaking Baghouse Filter A-4503Condition # 23896 was modified to reflect these changes. No emission increase resulted from this minor revision.
- NSR 17534 was to replace three existing baghouses with new ones (A-216, A-221, A-242). No emission increase resulted from this minor revision.
- NSR 18535 was to correct the hexavalent chromium emission limit as a result of switching fuel from coal to coke. Condition # 603 was modified to require installation of four flow meters at the calcining kiln (S-154) baghouse outlet and two flow meters at the fuel mill baghouses. Annual source testing for toxic metals was added to S-154. Condition # 11780 Part D.3. (calculated exhaust gas flow rate) will be deleted after flow meters are installed and data are reviewed since actual flow rates will be measured. No emission increase resulted from this minor revision.
- NSR 19385 was to separate the existing storage pile (S-606 for coal, coke, bauxite, iron ore) from S-111 Rail Unloading System Area and to add one new storage pile (S-607 for aggregate, slag). Condition # 24274 was added. There was an increase of 0.456 ton/year of PM10 emissions from this minor revision and Lehigh used emission reduction credits (ERCs) to offset the increase.
- NSR 20199 was to upgrade the nozzles to meet Enhanced Vapor Recovery (EVR) CARB Phase II requirement. Condition # 24297 and # 24298 were added.

B. Facility Description

The Lehigh Southwest Cement (Lehigh) facility produces Portland cement – a fine gray powder that binds sand and aggregate into concrete. Portland cement is the generic term for the type of hydraulic cement (one that would harden with the addition of water) used in virtually all concrete. Raw materials used in Portland cement manufacturing are comprised of calcium, silica, alumina, and iron. Although cement can be formed from a wide variety of materials, one of the most common combinations of raw materials is limestone, clay and sand. At the Lehigh facility, materials containing these minerals are mined in a quarry, ground to a fine powder, and blended in specific proportions needed for the final cement product. The finely ground mixture of raw materials are heated until partially molten (to

temperatures of 2550 to 2750°F) in a cement kiln to produce a pellet-shaped, glass-hard material called clinker. The clinker is then ground with gypsum to an extremely fine powder, Portland cement.

The Portland cement manufacturing process at the Lehigh facility consists of mining and handling of raw materials, raw milling and kiln feed preparation, pyroprocessing, coal and petroleum coke preparation, clinker cooling, and finish milling. The principal source operations at Lehigh consists of:

- Quarry Operations
- Primary Storage Piles
- Tertiary Crushing/Preblending
- Raw Milling
- Homogenizing
- Pyroprocessing
- Clinker Storage/Finish Milling
- Finish Product Storage and Load Out
- Fuel Preparation
- Concrete Aggregate Products (Rock Plant)

Primary emissions in the manufacturing of Portland cement at the Lehigh facility are combustion emissions, point-type particulate, and fugitive particulate. Plant operation is monitored and controlled by computer. The real-time computer system monitors feed rates and other parameters to optimize combustion control. Combustion emissions are generated in the pyroprocessing operation. Particulate emissions are generated throughout the facility from numerous stationary and mobile-type operations.

Baghouses are installed to recover product and control dust emissions from the kiln, mills, clinker cooler, fuel mill, belt conveyor transfer points, bulk unloading stations and at numerous other locations at the facility. Water is sprayed on haul roads and uncovered storage piles to control fugitive dust generation. Facility maintenance activities and practices such as watering of road surfaces and enforcement of the speed limits reduce the quantity of fugitives generated on-site and limit their transport off-site.

C. Permit Content

The legal and factual basis for the permit follows. The permit sections are described in the order presented in the permit.

I. Standard Conditions

This section contains administrative requirements and conditions that apply to all facilities. If the Title IV (Acid Rain) requirements for certain fossil-fuel fired electrical generating facilities or the accidental release (40 CFR § 68) programs apply, the section will contain a standard condition pertaining to these programs. Many of these conditions derive from 40 CFR § 70.6, Permit Content, which dictates certain standard conditions that must be placed in the permit. The language that the District has developed for many of these requirements has been adopted into the BAAQMD Manual of Procedures, Volume II, Part 3, Section 4, and therefore must appear in the permit.

The standard conditions also contain references to BAAQMD Regulation 1 and Regulation 2. These are the District's General Provisions and Permitting rules.

Changes to permit:

The dates of adoption and approval of rules in Standard Condition 1.A have been updated.

BAAQMD Regulation 2, Rule 5 – New Source Review of Toxic Air Contaminants has been added to Standard Condition 1.A.

SIP Regulation 2, Rule 6—Permits, Major Facility Review has been added to Standard Condition 1.A.

The following language was added to Standard Condition I.B.1: “If the permit renewal has not been issued by [], but a complete application for renewal has been submitted in accordance with the above deadlines, the existing permit will continue in force until the District takes final action on the renewal application.” This is the “application shield” pursuant to BAAQMD Regulation 2-6-407.

The Basis Regulation 2-6-409.20 was added to Standard Condition I.B.11.

The following language was added as Standard Condition I.B.12: “The permit holder is responsible for compliance, and certification of compliance, with all conditions of the permit, regardless whether it acts through employees, agents, contractors, or subcontractors. (Regulation 2-6-307).” The purpose is to reiterate that the Permit Holder is responsible for ensuring that all activities at the facility comply with all applicable requirements.

The Basis Regulation 3 and Cumulative increase were replaced with Regulation 2-6-501 for Standard Condition I.E.2.

The dates of the reporting periods and reporting deadlines in Standard Conditions I.F and I.G have been changed to align with the calendar year as requested by the applicant.

The Basis Regulation 3 was deleted from Standard Condition I.F.

II. Equipment

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S-24).

Permitted sources are those sources that require a BAAQMD operating permit pursuant to BAAQMD Rule 2-1-302.

Significant sources are those sources that have a potential to emit of more than 2 tons per year of a “regulated air pollutant” (as defined in BAAQMD Rule 2-6-222) or 400 pounds per year of a “hazardous air pollutant” (as defined in BAAQMD Rule 2-6-210).

All abatement (control) devices that control permitted or significant sources are listed. Each abatement device whose primary function is to reduce emissions is identified by an A and a number (e.g., A-24). If a source is also an abatement device, such as when an engine controls VOC emissions, it will be listed in the abatement device table but will have an “S” number. An abatement device may also be a source (such as a thermal oxidizer that burns fuel) of secondary emissions. If the primary function of a device is to control emissions, it is considered an abatement (or “A”) device. If the primary function of a device is a non-control function, the device is considered to be a source (or “S”).

The equipment section is considered to be part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types, contents or sizes of tanks, etc. This information is part of the factual basis of the permit.

Each of the permitted sources has previously been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These permits are issued in accordance with state law and the District’s regulations. The capacities in the permitted sources table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-403.

Following are explanations of the differences in the equipment list between the time that the facility originally applied for a Title V permit and the permit proposal date:

Table II-A – Permitted Sources

- S-1 EVR upgrade for gasoline dispensing operation, per NSR # 20199
- S-56 Cement Packer #3, deleted, removed from service

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- S-57 Cement Packer #4, deleted, removed from service
- S-100 Precalciner Kiln Fuel Handling System, added per TV # 17734/NSR # 15342
- S-154 Calciner Kiln, coke added to list of fuels used since it was previously omitted
- S-166 Bulk Clinker Rail Car Loadout System, deleted, removed from service
- S-173, deleted, removed from service
- S-174, deleted, removed from service
- S-203 Screen (8SC2), deleted (relocated and renamed S-604 Vibrating Screen per NSR # 15572)
- S-204 Tunnel Conveyor (8BC1) with 2 Belt Conveyors (8BC2&8BC8), deleted, removed from service
- S-205 Conveying System w/10 Belt Conveyors, deleted, removed from service
- S-206 5 Sand and Aggregate Piles, deleted, removed from service
- S-207, S-208, S-209 Cold Cleaners have been exempted per Regulation 2-1-118.4 for low VOC content and were deleted from Table II-A. Table II-C – Exempt Sources was added for these sources
- S-214 Rock Crusher 8CRI, deleted, removed from service
- S-215 Vibrating Screen (7-SC-1), deleted, removed from service
- S-231 Description deleted “Concrete Storage Silo”
- S-440 Surge Bin Feeder, deleted, removed from service
- S-441 Texas VSI Impact Crusher, deleted, removed from service
- S-442 Triple Deck Vibrating Screen, deleted, removed from service
- S-443 Conveyor, deleted, removed from service
- S-444 Emergency Clinker Conveyor, added per TV # 16867/NSR #15217
- S-601 Rock Hopper (9-DH-1), added per NSR # 15572 – Source status is Authority to Construct
- S-602 Conveyor System (9-PAF-1, 9-BC-1, 9-BC-2), added NSR # 15572 – Source status is Authority to Construct
- S-603 Vibrating Grizzly (9-VG-1), added NSR # 15572 – Source status is Authority to Construct
- S-604 Vibrating Screen (9-VS-2), added (relocated and renamed from S-203 Vibrating Screen per NSR # 15572) – Source status is Authority to Construct
- S-605 Jaw Crusher (9-CR-1), added per NSR # 15572 – Source status is Authority to Construct
- S-606 Storage Piles Area 1, added per NSR # 19385
- S-607 Storage Piles Area 2, added per NSR # 19385

Devices with Changed Permit Status

- S-207, S-208, S-209 Cold Cleaners have been exempted per Regulation 2-1-118.4 for low VOC content. Table II-C – Exempt Sources was added for this purpose.

District permit applications not included in this proposed permit

- None

Corrections to Devices Shown in Application

- S-121, S-134, S-135, S-151, S-164, S-171 through S-174, S-231, S-240, S-243, S-245, S-342 through S-350, S-360, S-380, S-383, S-384, S-390 descriptions corrected
- A-10, A-13, A-141, A-142, A-161, A-211, A-243, A-245 descriptions corrected

Table II-B – Abatement Devices

- Operating parameters were updated and corrected for some abatement devices

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- BAAQMD Regulation 6 changed to BAAQMD Regulation 6, Rule 1
- BAAQMD Regulation 6-1-310 emission limit was deleted from fugitive sources (S-300, S-350, S-360, S-370) since outlet grain loading does not apply
- BAAQMD Regulation 6-1-311 emission limit has been added to all particulate control devices
- A-100 Water Spray at Hopper Loading, added per TV # 17734/NSR # 15342
- A-111 BAAQMD condition # 2786 part B, 0.02 gr/dscf was deleted because this limit does not apply to S-111 in the condition
- A-112 BAAQMD condition # 2786 part B, 0.02 gr/dscf was deleted because this limit does not apply to S-112 in the condition
- A-113 BAAQMD condition # 2786 part B, 0.02 gr/dscf was deleted because this limit does not apply to S-113 in the condition
- A-114 BAAQMD condition # 2786 part B, 0.02 gr/dscf was deleted because this limit does not apply to S-114 in the condition
- A-115 BAAQMD condition # 2786 part B, 0.02 gr/dscf was deleted because this limit does not apply to S-115 in the condition
- A-121 BAAQMD condition # 2786 part B, 0.02 gr/dscf was deleted because this limit does not apply to S-121 and S-122 in the condition
- A-122 and A-123 BAAQMD condition # 2786 part B, 0.02 gr/dscf was deleted because this limit does not apply to S-122 and S-123 in the condition
- A-131 through A-135 BAAQMD condition # 2786 part B, 0.02 gr/dscf was deleted because this limit does not apply to S-131 through S-135 in the condition
- A-141 and A-142 PM Annual Source Test Operating Parameters were added
- A-143 and A-144 BAAQMD condition # 2786 part B, 0.02 gr/dscf was deleted because this limit does not apply to S-143 and S-144 in the condition
- A-151 through A-153 BAAQMD condition # 2786 part B, 0.02 gr/dscf was deleted because this limit does not apply to S-151 and S-153 in the condition
- A-162 through A-165 BAAQMD condition # 2786 part B, 0.02 gr/dscf was deleted because this limit does not apply to S-162 through S-165 in the condition
- A-166 Dust Collector DC144-10 Pulse Jet, deleted, removed from service
- A-171 and A-172 Limit of 3.3 lb/hr for BAAQMD Regulation 6-310 was deleted because it was an incorrect limit from BAAQMD condition # 2786 part B. BAAQMD condition # 2786 part B limit was corrected to 6.6 lb PM/hr total for A-171 and A-172 and PM Annual Source Test Operating Parameters were added and hourly mass limits were added
- A-174 Dust Collector DCE Volks, deleted, removed from service
- A-190 PM Annual Source Test Operating Parameters were added and basis for hourly mass limit was deleted for correction
- A-203 deleted (S-203 relocated and renamed S-604 Vibrating Screen; A-203 was replaced by A-4502 per NSR # 15572)
- A-214 Dust Collector 8-DC-2, deleted, removed from service
- A-215 Dust Collector 8-DC-1, deleted, removed from service
- A-216 Dust Collector 6DC13, A-221 Dust Collector 6DC6, A-242 Dust Collector 6DC11 were replaced and the outlet grain loading emission limit was lowered from 0.006 gr/dscf to 0.0013 gr/dscf per NSR # 17534
- For A-342, BAAQMD 6-310 was deleted because it was listed twice
- For A-422, BAAQMD condition # 16109, part 3 was added to Applicable Requirement description because it was previously omitted
- A-432 Dust Collector 7-PDC-03, deleted, removed from service
- A-441 Dust Collector 8-DC-4, deleted, removed from service
- A-442 Dust Collector 8-DC-5, deleted, removed from service

- A-444 Water Spray, added per NSR #15217
- For A-448: BAAQMD, 0.006 gr/dscf was deleted because the source/baghouse was mistakenly listed
- A-451 Dust Collector 7-PDC-04, deleted, removed from service
- A-606 Water Spray, added per NSR # 19385
- A-607 Water Spray, added per NSR # 19385
- A-2030 Water Sprays, deleted, removed from service
- A-2040 Water Sprays, deleted, removed from service
- A-2050 Water Sprays, deleted, removed from service
- A-2140 Water Sprays, deleted, removed from service
- A-2150 Water Sprays, deleted, removed from service
- A-4400 Water Sprays, deleted, removed from service
- A-4430 Water Sprays, deleted, removed from service
- A-4501 Water Spray System, added per NSR # 15572 – Source status is Authority to Construct
- A-4502 Dust Collector (9-DC-2), added per NSR # 15572 – Source status is Authority to Construct
- A-4503 Dust Collector (9-DC-1), added per NSR # 15572 – Source status is Authority to Construct
- A-4504 Dust Collector (9-DC-3), added per NSR # 15572 – Source status is Authority to Construct

Table II-C – Exempt Sources

- This table was added for exempt sources S-207, S-208, S-209 Cold Cleaners, S-60 and S-62 Diesel Storage Tanks, Low volatility solvent storage tanks, laboratories – hoods and testing equipment, and < 10 MMBTU/hr boiler

III. Generally Applicable Requirements

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit. If a generally applicable requirement applies specifically to a source that is permitted or significant, the standard will also appear in Section IV and the monitoring for that requirement will appear in Sections IV and VII of the permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). In addition, standards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound) are placed in this section.

Unpermitted sources are exempt from normal District permits pursuant to an exemption in BAAQMD Regulation 2, Rule 1. They may, however, be specifically described in a Title V permit if they are considered “significant sources” as defined in BAAQMD Rule 2-6-239.

Changes to permit:

The note regarding SIP information from the Rule Development Section has been deleted since the SIP standards are now found on the EPA website.

Table III has been updated by adding the following rules and standards to conform to current practice:

- SIP 2-1-429, Federal Emissions Statement
- BAAQMD Regulation 2, Rule 5, New Source Review of Toxic Air Contaminants

- BAAQMD Regulation 6, Particulate Matter and Visible Emissions has been designated as SIP Regulation 6, and the BAAQMD rule has been renamed and renumbered as Regulation 6, Rule 1, Particulate Matter, General Provisions
- BAAQMD and SIP Regulation 8, Rule 2, Miscellaneous Operations
- SIP Regulation 8, Rule 3 has been deleted since BAAQMD Regulation 8, Rule 3 has been SIP approved
- BAAQMD Regulation 8, Rule 4 Organic Compounds – General Solvent and Surface Coating Operations
- BAAQMD Regulation 8, Rule 15 Organic Compounds – Emulsified and Liquid Asphalts
- BAAQMD and SIP Regulation 8, Rule 40 Aeration of Contaminated Soil and Removal of Underground Storage Tanks
- BAAQMD and SIP Regulation 8, Rule 47, Air Stripping and Soil Vapor Extraction Operations
- BAAQMD and SIP Regulation 9, Rule 1 Inorganic Gaseous Pollutants – Sulfur Dioxide
- California Health and Safety Code Section 41750 et seq., Portable Equipment
- California Health and Safety Code Section 93115 et seq., Airborne Toxic Control Measure for Stationary Compression Ignition Engines
- California Health and Safety Code Section 93116 et seq., Airborne Toxic Control Measure for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater
- Compliance Assurance Monitoring (CAM), 40 CFR, Part 64

The dates of adoption or approval of the rules and their “federal enforceability” status in Table III have also been updated.

IV. Source-Specific Applicable Requirements, Applicable Limits & Compliance Monitoring Requirements

This section of the permit lists the applicable requirements that apply to permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

- District Rules
- SIP Rules (if any) are listed following the corresponding District rules. SIP rules are District rules that have been approved by EPA for inclusion in the California State Implementation Plan. SIP rules are “federally enforceable” and a “Y” (yes) indication will appear in the “Federally Enforceable” column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the “Federally Enforceable” column will have a “Y” for “yes”. If the SIP rule is not the current District rule, the SIP rule or the necessary portion of the SIP rule is cited separately after the District rule. The SIP portion will be federally enforceable; the non-SIP version will not be federally enforceable, unless EPA has approved it through another program.
- Other District requirements, such as the Manual of Procedures, as appropriate.
- Federal requirements (other than SIP provisions)
- BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit.
- Federal permit conditions. The text of Federal permit conditions, if any, is found in Section VI of the permit.

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District or EPA websites, or in the permit conditions, which are found in Section VI of the permit. All monitoring requirements are cited in Section IV.

Previous Section VII: Applicable Limits and Compliance Monitoring Requirements section of the permit was a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of **monitoring**.

Section IV and Section VII have been combined in this permit renewal. A discussion of monitoring is included in Section VII of this permit evaluation/statement of basis.

Complex applicability determinations in this Title V Permit Renewal

NESHAPs 40 CFR, Part 63, Subpart LLL supersedes the NSPS, Standards of Performance for Portland Cement Plants for many of the sources as noted in Table IV& VII of the permit.

The District has determined the monitoring of PM emissions from the raw mills (S-141, S-142), precalciner kiln (S-154), clinker cooler (S-161), and fuel mill systems (S-171, S-172) was inadequate; therefore, with this Title V renewal, the District is imposing an annual PM source test requirement in BAAQMD Condition # 2786, Part B and metal HAPs source test requirement in BAAQMD Condition # 603, Part 8.

Applicability of 40 CFR, Part 64, Compliance Assurance Monitoring (0000000000)

The Compliance Assurance Monitoring (CAM) regulation in 40 CFR, Part 64 was developed to provide assurance that facilities comply with applicable emissions limitations by adequately monitoring control devices. The CAM rule was effective on November 21, 1997. However, most facilities are not affected by CAM requirements until they submit applications for Title V permit renewal. As required, Lehigh has conducted an applicability analysis for CAM for the Lehigh Facility (Plant 17) as part of this renewal application and incorporated the applicable requirements in the permit markup for Table III-General.

CAM applies to a source of criteria pollutant or hazardous air pollutant (HAP) emissions if all the following requirements are met:

- The source is located at a major source for which a Title V permit is required; and
- The source is subject to a federally enforceable emission limitation or standard for a criteria pollutant or HAP; and
- The source uses a control device to comply with the federally enforceable emission limitation or standard; and
- The source has potential pre-control emissions of the regulated pollutant that are equal to or greater than the major source threshold for the pollutant (in BAAQMD, the major source thresholds are 100 tons per year for each criteria pollutant, 10 tons per year for a single HAP, and 25 tons per year for two or more HAPs); and
- The source is not otherwise exempt from CAM.

The applicability of 40 CFR, Part 64, Compliance Assurance Monitoring, was reviewed for the sources at this facility. Please see Appendix D for detailed CAM analysis.

- All sources subject to 40 CFR, Part 63, Subpart LLL: National Emissions Standards for Hazardous Air Pollutants (NESHAPs) From the Portland Cement Manufacturing Industry are exempt from CAM per 64.2(b)(1)(i) because the NESHAPs standards were proposed by the U.S. EPA after November 15, 1990.
- All sources subject to 40 CFR, Part 60, Subpart OOO: Standards of Performance for Nonmetallic Mineral Processing Plants are exempt from CAM per 64.2(b)(1)(i) because the amended

standards were proposed by the U.S. EPA after November 15, 1990. However, Lehigh took a conservative approach claiming that since the original standards were promulgated prior to November 15, 1990, further analysis for CAM needed to be conducted. Lehigh calculated the potential to emit (PTE) for these sources and determined that these sources had a PTE less than 100 tons per year except S-383 and S-384 (both abated by A-384 Baghouse. Lehigh submitted a CAM plan for these sources in Attachment 4 in Appendix D. Lehigh proposed daily monitoring of pressure drop across the baghouse filters in A-384 and periodic visible inspection.

- All sources subject to 40 CFR, Part 60, Subpart Y: Standards of Performance for Coal Preparation Plants are exempt from CAM per 64.2(b)(1)(i) because the amended standards were proposed by the U.S. EPA after November 15, 1990. However, Lehigh took a conservative approach claiming that since the original standards were promulgated prior to November 15, 1990, further analysis for CAM needed to be conducted. Lehigh calculated the potential to emit (PTE) for these sources and determined that these sources had a PTE less than 100 tons per year except S-121 abated by A-121 Baghouse and S-122 abated by A-122 Baghouse. Lehigh submitted a CAM plan for these sources in Attachment 3 in Appendix D. Lehigh proposed daily monitoring of pressure drop across the baghouse filters in A-121 and A-122 and periodic visible inspection.
- S-176 Rock Plant 1 Storage Pile, S-187 Sand Hopper and Storage Bin, S-201 Primary Crusher, S-202 Secondary Crusher, S-207, S-208, S-209 Cold cleaners, S-300 Wet Aggregate Storage Piles, S-344 Wet Screening Feed Conveyor, S-350 Wet Screening and Conveying, S-360 Wet Aggregate Loadout, S-370 Class 2 Additive Transfer System, S-380 Sand Transfer Class 2 Hopper, S-381 Sand Storage Pile and Conveyor, S-382 Water Clarifier Fines Shipment, S-501 and S-502 Emergency Diesel Engines, S-600 Quarry Blasting and Mobile Operations, S-606 and S-607 Storage Piles are exempt from CAM per 64.2(a)(2) because they do not use a control device.
- S-171 and S-172 Fuel Mills have inherent process equipment (A-171 and A-172 Baghouses) used to collect the fuel for use in the kiln (S-154); therefore, CAM is not applicable to S-171 and S-172 per 64.2(a)(2) because they are using the A-171 and A-172 as material recovery equipment, not for purposes of compliance with air pollution regulations.
- S-154 Kiln fuel combustion pollutants such as NO_x, SO₂, CO, VOC do not use control devices; therefore, CAM is not applicable per 64.2(a)(2).
- S-1 is exempt from CAM per 64.2(a)(3) because the potential pre-control emissions are not greater than 100 ton/yr as required by CAM.

District permit applications not included in this proposed permit

This facility sends a large number of permit applications to the District every year. Review of the following permit applications was not completed in time to include the results in this Title V permits. The Title V permit will be revised periodically to incorporate these applications as permit revisions following the procedures in Regulation 2, Rule 6, Major Facility Review.

Application #	Project Description
NSR 16612	Alternate Biofuels to reduce Greenhouse Gases – on hold until further notice from Lehigh.

Changes to permit:

- Table IV and Table VII have been combined.
- The description of Section VII has been added to Section IV Source-Specific Applicable Requirements, Emission Limits & Compliance Monitoring Requirements. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A),

quarterly (Q), monthly (M), weekly (W), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

- A column for Recordkeeping Protocol, R, has been added to Table IV & Table VII for completeness.
- The dates of adoption or approval of the rules and their “federal enforceability” status in the combined Table IV & Table VII have also been updated.
- “Toxic Risk [Management] Policy” basis for permit conditions has been updated to District Regulation 2-5 New Source Review Regulation for Toxic Air Contaminants because the regulation was adopted.
- BAAQMD Regulation 6, Particulate Matter and Visible Emissions has been designated as SIP Regulation 6, and the BAAQMD rule has been renamed and renumbered as Regulation 6, Rule 1, Particulate Matter, General Provisions
- The description of the BAAQMD 6-1-301 and SIP 6-301 and limit has been corrected to say “for < 3 min/hr.”
- The “type of limit” has been changed to “Opacity” for BAAQMD Regulation 6-1-301, since it is an opacity standard.
- The “type of limit” has been changed to “Filterable Particulate” for BAAQMD Regulation 6-1-310 and 6-1-311, since it is a filterable particulate standard.

Table IV & Table VII – A, S-1 Gasoline Dispensing Facility

- BAAQMD 8-7-116 was deleted, periodic testing exemption does not apply to S-1 per NSR Application # 20199
- BAAQMD 8-7-301.6 Monitoring Type was corrected to “Annual Check for Vapor Tightness and Proper Operation of Vapor Recovery System”
- BAAQMD 8-7-302.5 (Leak free and vapor tight) Emission Limit, Monitoring Requirement Citation, Monitoring Frequency, and Monitoring Type were deleted and replaced with Condition # 24298 in NSR Application # 20199
- Future effective dates (1/1/09) for BAAQMD 8-7-302.12: Liquid Retain Limitation and 8-7-302.13: Nozzle Spitting Limitation were deleted since the dates have passed
- BAAQMD 8-7-302.14 (backpressure) Emission Limit, Monitoring Requirement Citation, Monitoring Frequency, and Monitoring Type were replaced with Condition # 24298 in NSR Application # 20199
- BAAQMD 8-7-316 was deleted, aboveground storage tank requirement does not apply to underground storage tank per NSR Application # 20199
- BAAQMD Condition # 20666 Part 2 was separated into two sections for clarity. Limit and Monitoring Citation were updated to be consistent with NSR Application # 20199.
- BAAQMD Condition # 24297 was added per NSR Application # 20199
- BAAQMD Condition # 24298 was added per NSR Application # 20199

Table IV & Table VII – B, S-17 Clinker Transfer Area abated by A-436 Dust Collector

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).

- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(7) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(j) Monitor opacity according to O&M plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b)(4) Semiannual reporting of O&M and SSM (startup, shutdown, malfunction) actions consistent with the plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1354(b)(5) Notification of actions not consistent with O&M and SSM plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- BAAQMD Condition #16109, Part 5 description was corrected from cement loads < 70,000 trucks/year to cement loads < 70,000 trucks/rolling 12 month period.
- BAAQMD Condition# 16109 part 2 was deleted as a monitoring citation since it is redundant to BAAQMD Condition # 20751 Part 3b
- BAAQMD Condition # 20751 Part 2, operating range was added
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – C, S-19 Clinker Storage Area Abated by A-10, A-447, A-448, A-449, and A-450 Dust Collectors

- BAAQMD Regulation 6-302 was deleted because this source is not required to have an opacity sensing device and is not subject to this requirement
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable

- NESHAP 40 CFR, Part 63.1340(a) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(j) Monitor opacity according to O&M plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b)(4) Semiannual reporting of O&M and SSM (startup, shutdown, malfunction) actions consistent with the plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1354(b)(5) Notification of actions not consistent with O&M and SSM plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- BAAQMD Condition # 20751 Part 2, operating range was added
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – D S-21 Roll Press Clinker Surge Bin (6-SS-1) and Feeder (6-WF-1) abated by A-13 Dust Collector (renumbered from Table IV & Table VII – C-1)

- BAAQMD 6-302 and 6-501 were deleted since this source does not require an opacity sensing device
- Monitoring Citation for BAAQMD 6-1-301 and SIP 6-301 monitoring citation, monitoring protocol and frequency, reporting protocol was added since they were previously omitted. S-21/A-13 were added to Condition# 20751 and 20753
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(a) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1342 Standards: General, was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1348 Opacity Limit, was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(b)(2) Opacity initial performance tests was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(c) Opacity periodic performance tests was added since it was previously omitted

- NESHAP 40 CFR, Part 63.1350(a) Operations and malfunction (O&M) plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(b) Compliance with operations and maintenance plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(j) Monitor opacity according to O&M plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(3) Opacity test notification was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b)(2) Opacity observation reporting was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(b)(4) Semiannual reporting of O&M and SSM (startup, shutdown, malfunction) actions consistent with the plans reporting requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(b)(5) Notification of actions not consistent with O&M and SSM plans reporting requirements added since it was previously omitted
- NESHAP 40 CFR, Part 63.1355 Recordkeeping Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1356(a) Exemption from 40 CFR, Part 60, subpart F was added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- BAAQMD Condition# 20751 and 20753 were added since they were previously omitted

Table IV – D and Table VII – D were split into two tables, Table IV & VII – E for silos and Table IV&VII- F for cement loadout and packers

- S-56 Cement Packer #3 was deleted because the source was removed from service

Table IV & Table VII – E, S-45 West Silo Top Cement Distribution Tower abated by A-433 Dust Collector, S-46 Middle Silo Top Distribution Tower abated by A-434 Dust Collector, S-47 East Silo Top Distribution Tower abated by A-435 Dust Collector

- Opacity limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added to BAAQMD Regulation 6-1-301 and SIP Regulation 6-301 since they were previously omitted
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).

- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(8) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- Opacity limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added to NESHAP 40 CFR, Part 63.1348 since there were previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(j) Monitor opacity according to O&M plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b)(4) Semiannual reporting of O&M and SSM (startup, shutdown, malfunction) actions consistent with the plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1354(b)(5) Notification of actions not consistent with O&M and SSM plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- BAAQMD Condition# 16109 part 2 was deleted as a monitoring citation since it is redundant to BAAQMD Condition # 20751 Part 3b
- BAAQMD Condition# 16109 part 5 was deleted since S-45, S-46, and S-47 are used for onsite delivery of cement to silos and not subject to the facility export throughput limit of 70,000 cement trucks/year
- BAAQMD Condition # 20751 Part 2, operating range was added
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – F, S-48 Bulk Cement Loadout Tank #1 & 2 abated by A-420, A-421, A-422, and A-428 Dust Collectors, S-49 Bulk Cement Loadout Tank #28 abated by A-423, A-424, A-427, and A-429 Dust Collectors, S-50 Bulk Cement Loadout Tank #29 abated by A-425, A-426, A-427, and A-429 Dust Collectors, S-54 Cement Packer #1 abated by A-430 Dust Collector, S-55 Cement Packer #2 abated by A-431 Dust Collector

- Opacity limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added to BAAQMD Regulation 6-1-301 and SIP Regulation 6-301 since they were previously omitted
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted

- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(8) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- Opacity limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added to NESHAP 40 CFR, Part 63.1348 since there were previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(j) Monitor opacity according to O&M plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b)(4) Semiannual reporting of O&M and SSM (startup, shutdown, malfunction) actions consistent with the plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1354(b)(5) Notification of actions not consistent with O&M and SSM plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- BAAQMD Condition# 16109 part 2 was deleted as a monitoring citation since it is redundant to BAAQMD Condition # 20751 Part 3b
- BAAQMD Condition # 20751 Part 2, operating range was added
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV – E & Table VII – E, S-57 Cement Packer #4 abated by A-451 Dust Collector was deleted because the source was removed from service

Table IV & Table VII – G (renumbered from Table IV – F & Table VII – F), S-74 Type II Mechanical transfer System abated by A-58 Dust Collector

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).

- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(8) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- Opacity limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added to NESHAP 40 CFR, Part 63.1348 since there were previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(j) Monitor opacity according to O&M plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b)(4) Semiannual reporting of O&M and SSM (startup, shutdown, malfunction) actions consistent with the plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1354(b)(5) Notification of actions not consistent with O&M and SSM plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- BAAQMD Condition # 6655 Part 8 cement throughput limit was corrected from 1.6 million tons/year to 1.44 million tons/year
- BAAQMD Condition # 20751 Part 2 limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since they were previously omitted
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – H, S-100 Precalciner Kiln Fuel Handling System abated by A-100 Water Sprays

- Table of requirements was added for this new source (NSR Application # 15342)

Table IV & Table VII – I (renumbered from Table IV & Table VII – G), S-111 Rail Unloading System abated by A-111 Dust Collector, S-112 Additive Hopper Transfer System abated by A-112 Dust Collector, S-113 Additive Bin Transfer Facilities abated by A-113 and A-114 Dust Collectors, S-115 Additive Storage abated by A-115 Dust Collector

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- NESHAP 40 CFR, Part 60 Subpart A, General Provisions: Sections 60.18 General Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 60 Subpart Y 60.252(c), Monitoring citation frequency and reporting were added since these sources are required to be monitored by BAAQMD Conditions

- BAAQMD Condition # 20751 Part 2, operating range was added
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted
- BAAQMD Condition # 20753 Part 1. Deleted description of condition “for A-10” since it applies to all abatement devices in this table.

Table IV & Table VII – J (renumbered from Table IV & Table VII – H and I),
S-121 Tertiary Scalping Screen (2-VS-1, 2-VS-2) abated by A-121 Dust Collector,
S-122 Tertiary Crusher (2-cr-1) abated by A-121 and A-122 Dust Collectors,
S-123 Rock Conveying System abated by A-122 and A-123 Dust Collectors,
S-131 Rock Sampling System abated by A-131 Dust Collector,
S-132 Preblend abated by A-132 and A-133 Dust Collectors,
S-134 Preblend Storage Bin (4-S-1, 4-S-2) abated by A-134 Dust Collector
S-135 High Grade Storage Bin (4-S-3, 4-S-4) abated by A-135 Dust Collector

- S-121 and S-122 were moved to Table IV & Table VII – J – 1 because they are subject to 40 CFR, Part 64 CAM
- Descriptions of S-134 was corrected
- A-133 was added to S-132 since it was previously omitted
- Added S-135 to Table IV & Table VII – J because it is subject to the same regulations and permit conditions as the sources already in this table
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- NSPS 40 CFR, Part 60 Subpart A General Provisions, Sections 60.7 Notification and Recordkeeping, 60.8 Performance Testing Requirements, 60.10 State Authority and Delegation, 60.11 Compliance with Standards and Maintenance Requirements, 60.12 Circumvention, 60.13 Monitoring Requirements, 60.19 Recordkeeping Requirements were added since they were previously omitted
- NSPS 40 CFR, Part 60 Subpart F Section 60.62(c), Monitoring citation frequency and reporting were added since these sources are required to demonstrate compliance by initial performance test
- BAAQMD Condition # 20751 Part 2, operating range was added
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – J - 1

S-121 Tertiary Scalping Screen (2-VS-1, 2-VS-2) abated by A-121 Dust Collector,
S-122 Tertiary Crusher (2-cr-1) abated by A-121 and A-122 Dust Collectors

- Table of requirements were added because these sources are subject to 40 CFR, Part 64 CAM
- Description of S-121 was corrected
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- NSPS 40 CFR, Part 60 Subpart A General Provisions, Sections 60.7 Notification and Recordkeeping, 60.8 Performance Testing Requirements, 60.10 State Authority and Delegation, 60.11 Compliance with Standards and Maintenance Requirements, 60.12 Circumvention, 60.13 Monitoring Requirements, 60.19 Recordkeeping Requirements were added since they were previously omitted
- NSPS 40 CFR, Part 60 Subpart F Section 60.62(c), Monitoring citation frequency and reporting were added since these sources are required to demonstrate compliance by initial performance test

- 40 CFR, Part 64 CAM requirements and CAM plan were added
- BAAQMD Condition # 20751 Part 2, operating range was added, frequency of pressure drop reading was changed to daily to be consistent with the CAM plan
- BAAQMD Condition # 20751 Part 3c was added since it was previously omitted

Table IV & Table VII – K (renumbered from Table IV & Table VII – J)

S-141 Raw mill (4-GM-1) abated by A-141 Dust Collector,

S-142 Raw mill 2 (4-GM-2) abated by A-142 Dust Collector

- BAAQMD Regulation 6-1-301 and 310 and SIP 6-301 and 310 Monitoring citation BAAQMD condition #11780, part E was removed since this condition does not apply to opacity
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 6-1-311 and 310 and SIP 6-311 and 310 monitoring citation BAAQMD Condition # 2786 B was added for annual source test requirement per Title V permit review
- BAAQMD Regulation 9-1-301 monitoring citation was deleted and the monitoring citation was added to 9-1-304 since the CEM is in the kiln/inline raw mills baghouse exhaust stack, and not required to monitor ground level concentration of SO₂ at the fencelines
- BAAQMD Regulation 9-1-302 was deleted since the source is subject to 9-1-304 instead
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).
- Reg. 11-1 lead requirements for P-141 and P-142 for S-141 and S-142 Raw Mills were moved from Table VII – UU
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(1) Applicability (in-line kiln/raw mill) was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1343(a) General was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1343(b)(1) description of limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1343(b)(3) D/F description of limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1344 (a) and (b) monitoring protocol & frequency was changed from every 2.5 years to continuous with a thermocouple
- NESHAP 40 CFR, Part 63.1344 (f) Good Combustion Practices to minimize THC from fuel combustion since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(b)(3) D/F initial performance test was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(c) description was changed to add periodic performance testing for PM₁₀
- NESHAP 40 CFR, Part 63.1349(d) D/F periodic source test requirements was added since it was previously omitted

- NESHAP 40 CFR, Part 63.1350(c)(3) Compliance with opacity limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351(a) and (b) compliance dates were added since they were previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b) replaced specific subsections because the facility is subject to the whole section
- NESHAP 40 CFR, Part 63.1356(a) Exemption from NSPS 40 CFR, Part 60 Subpart F and Subpart OOO was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted
- BAAQMD Condition # 603 was added per NSR Application # 18535
- BAAQMD Condition # 2786 Part A1 description was detailed to include limit of 423 lb SO₂/hr if coal emissions are not monitored. Monitoring protocol was corrected to CEM from in stack monitoring
- BAAQMD Condition # 2786 Part A3 description was corrected to continuous from instack monitoring
- BAAQMD Condition # 2786 Part B PM Annual Source Test was added per Title V renewal review
- BAAQMD Condition # 2786 Part B1 Monitoring citation was changed from pressure drop monitoring to PM Annual Source Test per Title V renewal review
- BAAQMD Condition # 2786 Part F requirement for broken bag leak detection device was removed because Part F is not applicable to S-141 or S-142. Part F is applicable to A-143 and A-144.
- BAAQMD Condition # 11780 Part C(1) limit was corrected from “or” to “and.”
- BAAQMD Condition # 11780 Part C basis was corrected from Cumulative Increase to RACT
- BAAQMD Condition # 20751 Part 2, operating range was added
- BAAQMD Condition # 20751 Part 3a was added since it was previously omitted

Table IV & Table VII – L (renumbered from Table IV & Table VII – K)

S-143 Raw mill 1 Separator system (4-SE-3) abated by A-143 Dust Collector.

S-144 Raw mill 2 Separator Circuit (4-SE-4) abated by A-144 Dust Collector

- BAAQMD Regulation 6-1-301 and 6-1-310 and SIP Regulation 6-301 and 6-310 monitoring citation was corrected from BAAQMD condition #2786, part F and BAAQMD condition # 13900, parts 1&4 to BAAQMD condition #2786, part F, part 1 because condition 13900 does not apply to these sources
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable

- NESHAP 40 CFR, Part 63.1340(b)(3) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1347 monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol updated to reflect compliance with 63.1350(m)
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(e), (e)(1), and (e)(2) were deleted because CFR 63.1350(m) exempts these daily Method 22 testing requirements
- NESHAP 40 CFR, Part 63.1350(m) Daily M22 opacity testing exemption because S-143 and S-144 are equipped with bag leak detection systems was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- BAAQMD Condition # 2786 Part D and Part F limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since they were previously omitted
- BAAQMD Condition # 20751 Part 2 limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since they were previously omitted
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – M (renumbered from Table IV & Table VII – I)

S-151 Homogenizer (5-S-1, 5-S-2) abated by A-151 and A-152 Dust Collectors,

S-153 Kiln Feed System abated by A-153 Dust Collector

- S-135 was moved to Table IV & Table VII – J
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).
- BAAQMD Condition # 20751 Part 2 limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since they were previously omitted
- BAAQMD Condition # 20753 Part 1 limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(a) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted

- NESHAP 40 CFR, Part 63.1350(j) Monitor opacity according to O&M plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b)(4) Semiannual reporting of O&M and SSM (startup, shutdown, malfunction) actions consistent with the plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1354(b)(5) Notification of actions not consistent with O&M and SSM plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted
- BAAQMD Condition # 2786 Part D Monitoring citation was changed to Condition # 11780, Part E(2)
- BAAQMD Condition # 20751 Part 2, operating range was added
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – N (renumbered from Table IV & Table VII – L)

S-154 Precalciner Kiln abated by A-141 and A-142 Dust Collectors, and A-171 and A-172 Baghouses

- SIP Regulation 1-522 was added
- BAAQMD Regulation 6-1-301 and 310 and SIP 6-301 and 310 Monitoring citation BAAQMD condition #11780, part E was removed since this condition does not apply to opacity and Monitoring citation was corrected for A-141, A-142, A-171, and A-172
- BAAQMD Regulation 6-1-311 and 310 and SIP 6-311 monitoring citation BAAQMD Condition # 2786 B was added for annual source test requirement per Title V permit review
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 9-1-301 monitoring citation was deleted and the monitoring citation was added to 9-1-304 since the CEM is in the kiln/inline raw mills baghouse exhaust stack, and not required to monitor ground level concentration of SO₂ at the fencelines
- BAAQMD Regulation 9-1-302 was deleted since the source is subject to 9-1-304 instead
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a)
- Reg. 11-1 lead requirements for P-141, P-142, P-171, and P-172 for S-154 Precalciner Kiln were moved from Table VII – UU
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(1) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted

- NESHAP 40 CFR, Part 63.1343(a) General was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1343(b)(1) description of limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1343(b)(3) D/F description of limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1344 (a) and (b) monitoring protocol & frequency was changed from every 2.5 years to continuous with a thermocouple
- NESHAP 40 CFR, Part 63.1344 (f) Good Combustion Practices to minimize THC from fuel combustion since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(b)(3) D/F initial performance test was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(c) description was changed to add periodic performance testing for PM10
- NESHAP 40 CFR, Part 63.1349(d) D/F periodic source test requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(c)(3) Compliance with opacity limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351(a) and (c) compliance dates were added since they were previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(b) replaced specific subsections because the facility is subject to the whole section
- NESHAP 40 CFR, Part 63.1356(a) Exemption from NSPS 40 CFR, Part 60 Subpart F and Subpart OOO was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted
- BAAQMD Condition # 603 was assigned to S-154 and added per Application # 18535
- BAAQMD Condition # 2786, Part A(1) emission limit description was abbreviated, and monitoring type was corrected to CEM
- BAAQMD Condition # 2786 Part A3 description was corrected to continuous from instack monitoring
- BAAQMD Condition # 2786 Part B PM Annual Source Test was added per Title V renewal review
- BAAQMD Condition # 2786 Part B1 Monitoring citation was changed from pressure drop monitoring to PM Annual Source Test per Title V renewal review
- Throughput Condition # 11780 was corrected from Part D to Part B
- BAAQMD Condition # 20751 Part 2 limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since they were previously omitted

Table IV & Table VII – O (renumbered from Table IV & Table VII – M)

S-161 Clinker Cooler (5-CC-1) ABATED BY A-161 AND A-190 DUST COLLECTORS

- BAAQMD Regulation 6-1-301 and 310 and SIP Regulation 6-301 and 310 Monitoring citation was corrected to BAAQMD condition # 20751, part 3a for A-161; part 3b for A-190
- BAAQMD Regulation 6-1-311 and 310 and SIP 6-311 and 310 monitoring citation BAAQMD Condition # 2786 B was added for annual source test requirement per Title V permit review

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(2) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1343(a) General was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351(a) compliance date was added since they were previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(b) replaced specific subsections because the facility is subject to the whole section
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted
- BAAQMD Condition # 2786 Part B PM Annual Source Test was added per Title V renewal review
- BAAQMD Condition # 2786 Part B3 Monitoring citation was changed from pressure drop monitoring to PM Annual Source Test per Title V renewal review
- BAAQMD Condition # 2786 Part D Monitoring citation was changed to Condition # 11780, Part E(2)
- Throughput Condition # 11780 was corrected from Part D to Part B
- BAAQMD Condition # 20751 Part 2, operating range was added
- BAAQMD Condition # 20751 Parts 3a and 3b were added since they were previously omitted
- BAAQMD Condition # 20753 Part 2 was added since it was previously omitted

Table IV & Table VII – P (renumbered from Table IV & Table VII – N)

S-162 Clinker Silo (5-S-11) abated by A-162 Dust Collector,

S-163 Clinker Silo (5-S-12) abated by A-163 Dust Collector,

S-164 Free lime Storage Bin abated by A-164 Dust Collector

S-165 Clinker Transfer System abated by A-165 Dust Collector

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).

- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(j) Monitor opacity according to O&M plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b)(4) Semiannual reporting of O&M and SSM (startup, shutdown, malfunction) actions consistent with the plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1354(b)(5) Notification of actions not consistent with O&M and SSM plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- BAAQMD Condition # 2786 Part D Monitoring citation was changed to Condition # 11780, Part E(2)
- BAAQMD Condition # 20751 Part 2 limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since they were previously omitted
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – Q (renumbered from Table IV & Table VII – O and P)

S-171 Kiln Fuel Mill System abated by A-171 Baghouse, Pulse Jet Dust Collector

S-172 Precalciner Fuel Mill System abated by A-172 Baghouse, Pulse Jet Dust Collector

- Added S-172 to this table because these are related systems subject to the same requirements
- Description of S-172 changed to Precalciner Fuel Mill System
- BAAQMD Regulation 6-1-311 and 310 and SIP 6-311 monitoring citation BAAQMD Condition # 2786 B was added for annual source test requirement per Title V permit review
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- Reg. 11-1 lead requirements for P-171 and P-172 for S-171 and S-172 Kiln Fuel Mill System and Precalciner Fuel Mill System were moved from Table VII – UU
- NSPS 40 CFR, Part 60 Subpart A General Provisions, Sections 60.7 Notification and Recordkeeping, 60.8 Performance Testing Requirements, 60.10 State Authority and Delegation, 60.11 Compliance with Standards and Maintenance Requirements, 60.12 Circumvention, 60.13 Monitoring Requirements, 60.19 Recordkeeping Requirements were added since they were previously omitted

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- NSPS 40 CFR, Part 60 Subpart Y Section 60.252(c) Monitoring citation frequency and reporting were added since these sources are required to be monitored by BAAQMD Conditions
- NSPS 40 CFR, Part 60 Subpart Y Section 60.253 Monitoring of Operations was deleted because this section does not apply to this source
- BAAQMD Condition # 603 was added per NSR Application # 18535
- BAAQMD Condition # 804 was deleted because Part 1 (abatement requirement) is redundant with Condition # 603 Part 1 and Condition # 804 Part 2 (PM mass limit) is redundant with Condition # 2786 Part B.
- BAAQMD Condition # 1004 was deleted and the S-172 was added to Condition # 603 with the same conditions
- BAAQMD Condition # 2786 Part B PM Annual Source Test was added per Title V renewal review
- BAAQMD Condition # 2786 Part B2 Monitoring citation was changed from pressure drop monitoring to PM Annual Source Test per Title V renewal review
- BAAQMD Condition # 2786 Part D Monitoring citation was changed to Condition # 11780, Part E(2)
- BAAQMD Condition # 20751 Part 2, operating range was added
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV –Q and Table VII – Q

Deleted since sources S-173 Kiln Fuel System abated by A-175 and S-174 Precalciner Fuel System abated A-174 DCE Volks Dust Collector were removed from service

Table IV & Table VII – S (renumbered from Table IV & Table VII – R)
S-176 Rock Plant 1 Storage Pile

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD 6-310, 6-311 were deleted since these are fugitive dust sources not subject to these requirements

Table IV & Table VII – T (renumbered from Table IV & Table VII – S)
S-187 (aka S-387) Hopper and Storage Bin

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10 (Standards of Performance for New Stationary Sources), Part 1(Subpart A) and Part 66 (Subpart OOO) was deleted because this source is not subject to this regulation or NSPS since the date of original construction or last modification was prior to the effective date (August 31, 1983) of this regulation S-187 is included in the Permit Shield Table IX A-1.

Table IV & Table VII – U (renumbered from Table IV & Table VII – T)
S-201 Primary Crusher
S-202 Secondary Crusher

(This Table will be replaced by Table IV & Table VII – U-1 and Table IV & Table VII – SS upon startup of S-605 Jaw Crusher, which replaces S-201, from NSR Application #15572)

Table IV & Table VII – U-1

S-202 Symmons 7' Cone Crusher (9-CR-13) abated by Torit Shaking Baghouse Filter A-4502

S-604 Vibrating Screen (9-VS-2) abated by Torit Shaking Baghouse Filter A-4502

(This Table will replace Table IV & Table VII – U upon startup of S-605 Jaw Crusher, which replaces S-201, from NSR Application #15572)

- A-4502 and S-604 (previously S-203 Screen) and A-4502 was added in NSR Application # 15572
- BAAQMD Regulation 6-302 was deleted since this source is not required to have an opacity sensing device and therefore is not subject to this section
- BAAQMD Regulation 6-1-301 and 310, and SIP Regulation 6-301 and 310 monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since the abatement device is monitored by a broken bag leak detection device
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Condition # 23896 Part 1: Abatement requirement, Part 2: Ringelmann 1.0 limitation, Part 4: Recordkeeping requirements, Part 5 Baghouse Monitoring requirement, Part 6: Records retention requirement, Part 8: Startup condition
- BAAQMD Regulation 10 Standards of Performance for New Stationary Sources, Part 1: Subpart A – General Provisions, and Part 66 Subpart OOO – Standards of Performance for Non-metallic Mineral Processing Plants was added since the sources are now abated by the same baghouse and emissions cannot be distinguished between the sources. S-202 was listed in the Permit Shield from NSPS requirements, however, since emissions will be emitted through the same stack as S-604, which is subject to NSPS, S-202 will now be subject to NSPS requirements.
- NSPS 40 CFR, Part 60, Subpart OOO: Standards of Performance for Non-metallic Mineral Processing Plants was added

Table IV—U and Table VII – U for S-103, S-104, S-205, S-206, S-214, S-215 were deleted since these sources were removed

Table IV—V and Table VII – V for S-207, S-208, and S-209 Solvent cold cleaners were deleted since the facility now uses exempt solvents, and these sources were move to Table II-C

Table IV & Table VII – V (renumbered from Table IV & Table VII – W)

S-210 Finish Mill (6-GM-1) abated by A-210 Dust Collector

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(4) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1347 monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol updated to reflect compliance with 63.1350(m)

- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(e), (e)(1), and (e)(2) were deleted because CFR 63.1350(m) exempts these daily Method 22 testing requirements
- NESHAP 40 CFR, Part 63.1350(m) Daily M22 opacity testing exemption because S-210 is equipped with bag leak detection system was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- BAAQMD Condition # 779, Part 3 monitoring citation was added to detail where clinker production is required to be monitored

Table IV & Table VII – W (renumbered from Table IV & Table VII – X)

S-211 Separator (6-SE-2) abated by A-211 Dust Collector

- Description of source changed by capitalizing “se.”
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a)
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(4) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1347 monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol updated to reflect compliance with 63.1350(m)
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(e), (e)(1), and (e)(2) were deleted because CFR 63.1350(m) exempts these daily Method 22 testing requirements
- NESHAP 40 CFR, Part 63.1350(m) Daily M22 opacity testing exemption because S-211 is equipped with bag leak detection system was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted

- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted
- BAAQMD Condition # 4996 Parts 3, 4, 5, and 6 were updated to reflect changes made in NSR Application # 17354

Table IV & Table VII – X (renumbered from Table IV & Table VII – Y)

S-216 Clinker Cake Conveyor (6-BC-13) abated by A-216 Dust Collector,

S-217 Clinker Cake Conveyor (6-BC-15) abated by A-217 Dust Collector

S-221 Clinker Cake Feeder (6-WF-2) abated by A-221 Dust Collector,

S-231 Pressed Cake Bin (6-SS-2) abated by A-231 Dust Collector ,

S-242 Clinker Cake Feeder (6-WF-3) abated by A-242 Dust Collector

- Description (6-SS-2) moved to describe S-231
- BAAQMD Regulation 6-1-301 and SIP 6-301 description of monitoring protocol changed from manometer to monitoring for consistency
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a)
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(j) Monitor opacity according to O&M plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b)(4) Semiannual reporting of O&M and SSM (startup, shutdown, malfunction) actions consistent with the plans reporting requirements added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(b)(5) Notification of actions not consistent with O&M and SSM plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted
- BAAQMD Condition # 4996 was updated to reflect changes made in NSR Application #17534
- BAAQMD Condition # 20751 Part 2, operating range was added

- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – Y (renumbered from Table IV & Table VII – Z)

S-218 Air Separator (6-SE-1) abated by A-218 Dust Collector

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a)
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(4) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1347 monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol updated to reflect compliance with 63.1350(m)
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(e), (e)(1), and (e)(2) were deleted because CFR 63.1350(m) exempts these daily Method 22 testing requirements
- NESHAP 40 CFR, Part 63.1350(m) Daily M22 opacity testing exemption because S-210 is equipped with bag leak detection system was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- Added BAAQMD condition # 20751 because it was previously omitted
- BAAQMD condition # 4997, part 5 monitoring citation for recordkeeping of clinker production was corrected from continuous to daily

Table IV & Table VII – Z (renumbered from Table IV & Table VII – AA)

S-220 Finish Mill (6-GM-2) abated by A-220 Dust Collector

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a)

- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(4) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1347 monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol updated to reflect compliance with 63.1350(m)
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(e), (e)(1), and (e)(2) were deleted because CFR 63.1350(m) exempts these daily Method 22 testing requirements
- NESHAP 40 CFR, Part 63.1350(m) Daily M22 opacity testing exemption because S-220 is equipped with bag leak detection system was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.

Table IV & Table VII – AA (renumbered from Table IV & Table VII – BB)

S-222 Gypsum feeder (6-WF-4) abated by A-222 Dust Collector,

S-240 Additive Conveyor/bins abated by A-240 Dust Collector,

S-243 6-GM-1 Gypsum Feeder (6-WF-9) abated by A-243 Dust Collector,

S-244 Pozzolan Feeder (6-WF-7) abated by A-244 Dust Collector,

S-245 6-GM-1 Clay Feeder (6-WF-5) abated by A-245 Dust Collector

- BAAQMD Regulation 6-1-301 and SIP Regulation 6-301 monitoring citation added BAAQMD condition # 20751, part 3b since it was previously omitted
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a)
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted

- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(j) Monitor opacity according to O&M plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b)(4) Semiannual reporting of O&M and SSM (startup, shutdown, malfunction) actions consistent with the plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1354(b)(5) Notification of actions not consistent with O&M and SSM plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- BAAQMD Condition # 20751 Part 2, operating range was added
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – BB (renumbered from Table IV & Table VII –CC)
S-230 Hydraulic Roller Press (6-RP-1) abated by A-230 Dust Collector

- Description of source changed by capitalizing “RP”
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a)
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(4) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1347 monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol updated to reflect compliance with 63.1350(m)
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(e), (e)(1), and (e)(2) were deleted because CFR 63.1350(m) exempts these daily Method 22 testing requirements
- NESHAP 40 CFR, Part 63.1350(m) Daily M22 opacity testing exemption because the source is equipped with bag leak detection system was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted

- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted
- BAAQMD Condition # 4999 Part 5 Monitoring Type changed from “Hours of Operation” to “record keeping” for consistency
- BAAQMD Condition # 4999 Part 6 deleted from Table IV & VII because it was a startup condition for an initial source test that was completed

Table IV & Table VII – CC (renumbered from Table IV & Table VII –DD)

S-300 Rockplant Wet Aggregate Storage Piles abated by A-300 Water Spray System

- BAAQMD 6-310, 6-311 were deleted since this is a fugitive dust source not subject to these requirements
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.670(f) was placed as a separate requirement to identify applicable Subpart A requirements
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(c) Standard for Particulate Matter limit for fugitive emissions from any crusher was replaced with 60.672(b) for fugitive emissions from a transfer point or other affected facility
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(a)(1) Standard for Particulate Matter limit was deleted because it applied to stack emissions
- Changed monitoring citation to BAAQMD Condition #7252 Part 6 where record keeping of compliance with surface wet and throughput limitation is monitored

Table IV & Table VII – DD (renumbered from Table IV & Table VII –EE)

S-301 Rail Loadout System abated by A-301 Rail Loadout Dust Collector

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1348 future effective date (6/14/02) was deleted since the date has passed
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted

- NESHAP 40 CFR, Part 63.1350(j) Monitor opacity according to O&M plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b)(4) Semiannual reporting of O&M and SSM (startup, shutdown, malfunction) actions consistent with the plans reporting requirements added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(b)(5) Notification of actions not consistent with O&M and SSM plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted
- BAAQMD Condition # 7837 Part 1 and Part 2 reporting protocol changed to annually
- BAAQMD Condition # 20751 Part 2 limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since they were previously omitted
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – EE (renumbered from Table IV & Table VII –FF)

S-340 Coarse Rock Withdrawal System abated by A-340 Baghouse,

S-341 Screens abated by A-341 Baghouse,

S-343 Crushed Rock Conveyors abated by A-341 Baghouse,

- S-390 Conveyor abated by A-390 Baghouse was moved to Table IV & Table VII – EE-1 since it is not subject to NSPS 40 CFR, Part 60 Subpart OOO because it was constructed prior to Aug. 31, 1983
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.670(f) was placed as a separate requirement to identify applicable Subpart A requirements
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(a)(1) was updated to 60.672(a) and the monitoring citation was updated to 60.11 and 60.675 for specificity
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(c) fugitive emissions opacity limitation was replaced with Section 60.672(b), and Section 60.672(a) opacity limitation from stack emissions was added since these sources are abated by baghouses and have stack emissions
- NSPS 40 CFR, Part 60.672, Monitoring citation frequency and reporting were added since these sources are required to demonstrate compliance by initial performance test
- Changed description of BAAQMD Condition 7247 Part 7 from Hour of Operation to Hours of Operation.
- BAAQMD Condition # 20751 Part 2 limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since they were previously omitted
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – EE-1

S-390 Conveyor abated by A-390 Baghouse

- S-390 Conveyor abated by A-390 Baghouse was separated from Table IV & Table VII – FF since it is not subject to NSPS 40 CFR, Part 60 Subpart OOO because it was constructed prior to Aug. 31, 1983
- S-390 has been granted a Permit Shield from NSPS 40 CFR, Part 60 Subpart OOO because it was constructed prior to Aug. 31, 1983

Table IV & Table VII – FF (renumbered from Table IV & Table VII –GG)

S-342 Rock Crushers abated by A-342 Baghouse

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.670(f) was placed as a separate requirement to identify applicable Subpart A requirements
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(a)(1) was updated to Section 60.672(a) and monitoring citation was updated to 60.11 and 60.675 for specificity
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(b) is replaced with 60.672(a) opacity limitation since the source is abated by a baghouse and has stack emissions
- Corrected Basis for BAAQMD Condition # 7246 Part 10 from NESHAPs to NSPS

Table IV & Table VII – GG (renumbered from Table IV & Table VII –HH)

S-344 Rockplant Wet Screen Feed Conveyor abated by A-350 Water Spray System

- BAAQMD 6-310, 6-311 were deleted since this is a fugitive dust source not subject to these requirements
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.670(f) was placed as a separate requirement to identify applicable Subpart A requirements
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(a)(1) was deleted since this source does not have stack emissions
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(c) fugitive emissions opacity limitation from crushers was replaced with Section 60.672(b) fugitive emissions opacity limitation for other sources since this is not a crusher and monitoring citation was updated to 60.11 and 60.675

Table IV & Table VII – HH (renumbered from Table IV & Table VII –II)

S-350 Rockplant Wet Screen and Conveying abated by A-350 Water Spray System

- BAAQMD 6-310, 6-311 were deleted since these are fugitive dust sources not subject to these requirements
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.670(f) was placed as a separate requirement to identify applicable Subpart A requirements
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(a)(1) was deleted since this source does not have stack emissions
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(c) fugitive emissions opacity limitation from crushers was replaced with Section 60.672(b) fugitive emissions opacity limitation for other sources since this is not a crusher and monitoring citation was updated to 60.11 and 60.675

Table IV & Table VII – II (renumbered from Table IV & Table VII –JJ)

S-360 Rockplant Wet Aggregate Loadout System abated by A-360 Water Spray System

- BAAQMD 6-310, 6-311 were deleted since these are fugitive dust sources not subject to these requirements
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.670(f) was placed as a separate requirement to identify applicable Subpart A requirements
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(a)(1) was deleted since this source does not have stack emissions
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(c) fugitive emissions opacity limitation from crushers was replaced with Section 60.672(b) fugitive emissions opacity limitation for other sources since this is not a crusher and monitoring citation was updated to 60.11 and 60.675

Table IV & Table VII – JJ (renumbered from Table IV & Table VII –KK)

S-380 Sand Transfer Hopper,

S-381 Sand Storage Pile,

S-382 Water Clarifier Fines System

S-380, S-381, And S-382 Also Abated by Haul Road Sprinkler System

- S-370 Aggregate Additive Transfer System with Silo abated by A-370 Water Spray was moved to Table IV & Table VII – JJ-1 since it is not subject to NSPS 40 CFR, Part 60 Subpart OOO because it was constructed prior to Aug. 31, 1983
- BAAQMD 6-310, 6-311 were deleted since these are fugitive dust sources not subject to these requirements
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.670(f) was placed as a separate requirement to identify applicable Subpart A requirements
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(a)(1) was deleted since this source does not have stack emissions
- NSPS 40 CFR, Part 60 Subpart OOO Section 60.672(c) fugitive emissions opacity limitation from crushers was replaced with Section 60.672(b) fugitive emissions opacity limitation for other sources since this is not a crusher and monitoring citation was updated to 60.11 and 60.675

Table IV & Table VII – JJ-1

S-370 Aggregate Additive Transfer System with Silo abated by A-370 Water Spray

- S-370 Aggregate Additive Transfer System with Silo abated by A-370 Water Spray was separated from Table IV & Table VII – KK since it is not subject to NSPS 40 CFR, Part 60 Subpart OOO because it was constructed prior to Aug. 31, 1983
- S-370 has been granted a Permit Shield from NSPS 40 CFR, Part 60 Subpart OOO because it was constructed prior to Aug. 31, 1983

Table IV & Table VII – KK (renumbered from Table IV & Table VII –LL)

S-383 Rock Plant 2 Conveyors abated by A-384 Baghouse,

S-384 Rock Plant 2 Screens abated by A-384 Baghouse

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted

- NSPS 40 CFR, Part 60 Subpart OOO was deleted because the sources were constructed prior to Aug. 31, 1983
- S-383 and S-384 have been granted a Permit Shield from NSPS 40 CFR, Part 60 Subpart OOO because they were constructed prior to Aug. 31, 1983
- 40 CFR, Part 64 CAM requirements and CAM plan were added
- BAAQMD condition # 20751 was added

Table IV & Table VII – LL (renumbered from Table IV & Table VII –MM)
S-412 FINISH MILL (6-GM-3) ABATED BY A-218 DUST COLLECTOR

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b)(4) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1347 monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol updated to reflect compliance with 63.1350(m)
- NESHAP 40 CFR, Part 63.1347 monitoring citation corrected from BAAQMD condition # 139000 to 13900
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(e), (e)(1), and (e)(2) were deleted because CFR 63.1350(m) exempts these daily Method 22 testing requirements
- NESHAP 40 CFR, Part 63.1350(m) Daily M22 opacity testing exemption because S-412 is equipped with bag leak detection system was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- BAAQMD Condition # 20751 Part 2 limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since they were previously omitted
- BAAQMD Condition # 20751 Part 3a was added since it was previously omitted

Table IV & Table VII – MM (renumbered from Table IV & Table VII – NN)

S-414 Kiln Dust Additive Bin abated by A-414 Dust Collector

- For Monitoring Protocol, Pressure Drop Manometer was changed to Pressure Drop Monitoring for consistency
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.1 Applicability, 63.2 Definitions, 63.3 Units and Abbreviations, 63.5 Preconstruction review and notification requirements, 63.9 Notification Requirements were added since they were previously omitted
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions: Sections 63.11 Control Device Requirement was deleted because the abatement device is not a flare; therefore, it is not applicable
- NESHAP 40 CFR, Part 63.1340(b) Applicability was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1341 Definitions was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1349(a) Initial Compliance with emission limit was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1350(j) Monitor opacity according to O&M plan was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1351 Compliance date June 14, 2002 was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(a) Notification Requirements was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1353(b)(5) Notification of Compliance Status for affected sources that become subject to a relevant standard was added since it was previously omitted
- NESHAP 40 CFR, Part 63.1354(a) Reporting Requirements of Subpart A
- NESHAP 40 CFR, Part 63.1354(b)(4) Semiannual reporting of O&M and SSM (startup, shutdown, malfunction) actions consistent with the plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1354(b)(5) Notification of actions not consistent with O&M and SSM plans reporting requirements added since it was previously omitted.
- NESHAP 40 CFR, Part 63.1358 Implementation and Enforcement was added since it was previously omitted.
- BAAQMD Condition # 13982 Part 3 emission limit citation was corrected to Outlet grain loading limitation
- BAAQMD Condition # 20751 Part 2 limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since they were previously omitted
- BAAQMD Condition # 20751 Part 3b was added since it was previously omitted

Table IV & Table VII – NN (renumbered from Table IV & Table VII –WW)

S-415 Finish Mill Building Conveyor abated by A-415 Dust Collector

- BAAQMD Regulation 6-1-301 and 3-1-310, and SIP 6-301 and 6-310 limit, monitoring citation, protocol & frequency, reporting protocol, recordkeeping protocol were added since they were previously omitted
- BAAQMD Regulation 6-1-311 and SIP Regulation 6-311 monitoring protocol& frequency were changed to “No monitoring” because these sections do not have monitoring requirements

- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted
- BAAQMD Regulation 10: Standards of Performance for New Stationary Sources Part 1 and Part 10 were removed because this source is exempt from NSPS 40 CFR, Part 60 Subpart F per NESHAP 40 CFR, Part 63.1356(a).
- 40 CFR, Part 60 Subpart OOO: Standards of Performance for Nonmetallic Mineral Processing Plants was removed because this source is not subject to this regulation.
- NESHAP 40 CFR, Part 63 Subpart A, General Provisions was added since this source is subject to NESHAPs
- NESHAP 40 CFR, Part 63 Subpart LLL, National Emissions Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry was added since it was previously omitted
- BAAQMD Condition # 20751 was added to require installation of manometer and quarterly pressure drop recordkeeping per Title V renewal review
- BAAQMD Condition # 21345 Part 1 description abbreviated and throughput limit moved to Limit column
- BAAQMD Condition # 21345 Part 3 description changed and “outlet” grain loading. Monitoring citation, monitoring protocol & frequency, reporting protocol, and recordkeeping protocol were added since the facility is required to have pressure drop monitoring for this baghouse per BAAQMD Condition # 21345 Part 2.

Table IV – OO, PP, QQ, RR and Table VII – OO, PP, QQ, RR were removed because sources S-440, 441, 442, and 443 were removed.

Table IV & Table VII – OO is a newly permitted source
S-444 Emergency Clinker Conveyor abated by A-444 Water Spray

- This table was added for existing source per NSR Application # 15217

Table IV & Table VII – PP (renumbered from Table IV & Table VII –SS)
S-501 Emergency Diesel Generator
S-502 Emergency Diesel Generator

- BAAQMD Regulation 9-1-301 Ground Level Concentration (SO₂) was added since it was previously omitted
- BAAQMD Regulation 9-8-330 sections were added since the regulation was amended on 7/25/2007 and these sections are now applicable. Monitoring citations were updated.
- SIP Regulation 9-8 was added for the federally enforceable section. This regulation excluded emergency standby engines.
- Condition # 18855 was deleted and replaced with Condition # 22820 since these engines are subject to the CARB Stationary Diesel ATCM

Table IV – TT and Table VII – TT were removed because the source (S-166) was removed.

Table IV & Table VII – QQ (renumbered from Table IV & Table VII –VV)
S-600 Quarry Blasting and Mobile Operations

- BAAQMD Regulation 1 – 301 was added since it was previously omitted.
- BAAQMD Regulation 6-1-601 and SIP Regulation 6-601: Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions, which refers to the Manual of Procedures was added since it was previously omitted

- BAAQMD Regulation 10 Parts 1 and 10 (NSPS Subpart A and F) were deleted since this source is not subject to this regulation
- Monitoring citation for BAAQMD Condition # 21025 Part 3 was removed because it was repetitive (Part 3 is a recordkeeping requirement)

Table IV & Table VII – RR

S-601 Rock Hopper (9-DH-1) abated by Water Spray A-4501

(This Table will be effective upon startup of S-601, from NSR Application #15572)

- S-601 was a grandfathered source that was permitted in NSR Application # 15572
- This source was constructed prior to August 31, 1983, therefore it is not subject to NSPS 40 CFR, Part 60 Subpart OOO Standards of Performance for Nonmetallic Mineral Processing Plants
- BAAQMD Regulation 6-1 and SIP Regulation 6 were added
- BAAQMD Condition # 23896 Part 1: Abatement requirement, Part 2: Ringelmann 1.0 limitation, Part 4: Recordkeeping requirements, Part 6: Records retention requirement

Table IV & Table VII – SS

S-602 Conveyor System (9-PAF-1, 9-BC-1, 9-BC-2) abated by Torit Shaking Baghouse Filters A-4502, A-4503, A-4504

S-603 Vibrating Grizzly (9-VG-1) abated by Torit Shaking Baghouse Filter A-4503

S-605 Jaw Crusher (9-CR-1) abated by Torit Shaking Baghouse Filter A-4503

(This Table will replace Table IV & Table VII – U upon startup of S-605 Jaw Crusher, which replaces S-201, from NSR Application #15572)

- S-602 and S-603 were grandfathered sources that were permitted in NSR Application # 15572
- S-605 is a new source permitted in NSR Application # 15572
- BAAQMD Regulation 6-1 and SIP Regulation 6 were added
- BAAQMD Regulation 10 Standards of Performance for New Stationary Sources, Part 1: Subpart A – General Provisions, and Part 66 Subpart OOO – Standards of Performance for Non-metallic Mineral Processing Plants was added since the sources are now abated by the same baghouse and emissions cannot be distinguished between the sources. S-202 was listed in the Permit Shield from NSPS requirements, however, since emissions will be emitted through the same stack as S-604, which is subject to NSPS, S-202 will now be subject to NSPS requirements.
- NSPS 40 CFR, Part 60, Subpart OOO: Standards of Performance for Non-metallic Mineral Processing Plants was added

Table IV & Table VII – TT

S-606 Storage Piles Area 1 abated by A-606 Water Spray

S-607 Storage Piles (Area 2) abated by A-607 Water Spray

- Table of requirements was added for these new sources (NSR Application # 19385)

Table IV & Table VII – UU

P-111 for S-111 Rail Unloading System,

P-112 for S-112 Additive Hopper Transfer System,

P-113 and P-114 for S-113 additive Bin Transfer Facilities,

P-115 for S-115 Additive Storage,

- S-173 and S-174, A-175 and A-174 were removed from service
- Reg. 11-1 lead requirements for P-141 and P-142 for S-141 and S-142 Raw Mills were moved to Table IV & VII – K
- Reg. 11-1 lead requirements for P-141, P-142, P-171, and P-172 for S-154 Precalciner Kiln were moved to Table IV & VII – N

- Reg. 11-1 lead requirements for P-171 and P-172 for S-171 and S-172 Kiln Fuel Mill System and Precalciner Fuel Mill System were moved to Table IV & VII – Q
- SIP Regulation 11, Rule 1 was added for completeness

V. Schedule of Compliance

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10 which provides that a major facility review permit shall contain the following information and provisions:

“409.10A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and
- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.”

Since the District has not determined that the facility is out of compliance with an applicable requirement, the schedule of compliance for this permit contains only sections 2-6-409.10.1 and 2-6-409.10.2.

The BAAQMD Compliance and Enforcement Division has conducted a review of compliance over the past year and there is no evidence of on-going non-compliance and recurring pattern of violations that would warrant consideration of a Title V permit compliance schedule. The compliance report is contained in Appendix A of this permit evaluation and statement of basis.

VI. Permit Conditions

During the Title V permit development, the District has reviewed the existing permit conditions, deleted the obsolete conditions, and, as appropriate, revised the conditions for clarity and enforceability. Each permit condition is identified with a unique numerical identifier, up to five digits.

When necessary to meet Title V requirements, additional monitoring, recordkeeping, or reporting requirements have been added to the permit.

All changes to existing permit conditions are clearly shown in “strike-out/underline” format in the proposed permit. When the permit is issued, all “strike-out” language will be deleted and all “underline” language will be retained, subject to consideration of comments received.

The existing permit conditions are derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). Permit conditions may also be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 et seq., an order of abatement pursuant to H&SC § 42450 et seq., or as an administrative revision initiated by District staff. After issuance of the Title V permit, permit conditions will be revised using the procedures in Regulation 2, Rule 6, Major Facility Review.

The District has reviewed and, where appropriate, revised or added new annual and daily throughput limits on sources so as to help ensure compliance with District rules addressing preconstruction review. The applicability of preconstruction review depends on whether there is a “modified source” as defined in District Rule 2-1-234. Whether there is a modified source depends in part on whether there has been an “increase” in “emission level.” 2-1-234 defines what will be considered an emissions level increase, and takes a somewhat different approach depending on whether a source has previously permitted by the District.

Sources that were modified or constructed since the District began issuing new source review permits will have permits that contain throughput limits, and these limits are reflected in the Title V permit. These limits have previously undergone District review, and are considered to be the legally binding “emission level” for purposes of 2-234.1 and 2-1-234.2. By contrast, for older sources that have never been through preconstruction review (commonly referred to as “grandfathered” sources), an “increase” in “emission level” is addressed in 2-1-234.3. A grandfathered source is not subject to preconstruction review unless its emission level increases above the highest of either: 1) the design capacity of the source, 3) the capacity listed in a permit to operate, or 3) highest capacity demonstrated prior to March 2000. However, if the throughput capacity of a grandfathered source is limited by upstream or downstream equipment (i.e., is “bottlenecked”), then the relaxing of that limitation (“debottlenecking”) is considered a modification.

The District has written throughput limits into the Title V permit for grandfathered sources. As discussed above, these limits are written for the purpose of determining whether an increase in emission levels has occurred. The purpose of these limits is to facilitate implementation of preconstruction review program. If these limits are exceeded, the facility would be expected to report the exceedence, and the District would treat the reported exceedence as presumptively establishing the occurrence of a modification. The facility would then be expected to apply for a preconstruction permit addressing the modification and the District would consider whether an enforcement action was appropriate.

It is important to note the presumptive nature of throughput limits for grandfathered sources that are created in the Title V permit. These limits are generally based upon the District’s review of information provided by the facility regarding the design capacity or highest documented capacity of the grandfathered source. To verify whether these limits reflect the true design, documented, or “bottlenecked” capacity (pursuant to 2-10234.1) of each source is beyond the resource abilities of the District in this Title V process. Moreover, the District cannot be completely confident that the facility has had time or resources necessary to provide the most accurate information available in this regard. Creating throughput limits in the Title V permit for grandfathered sources is not required by either Part 70 or the District’s Major Facility Review rules. Despite the lack of such a requirement, and despite the resource and information challenges presented in the Title V process, the District believes that writing presumptive limits for grandfathered sources into the Title V permit will provide a measure of predictability regarding the future applicability of the preconstruction review program, and that this increased predictability is universally beneficial.

It follows from the presumptive nature of these throughput limits for grandfathered sources that exceedence of these limits is not per se a violation of the permit. *Failure to report an exceedence would be a permit violation.* In this sense, the throughput limits function as monitoring levels, and are imposed pursuant to the District’s authority to required monitoring that provide a reasonable assurance of compliance. If an exceedence occurs, the facility would have an opportunity to demonstrate that the throughput limit in fact did not reflect the appropriate limit for purposes of 2-1-234.3. If the facility can demonstrate this, no enforcement action would follow, and the permit would be revised at the next opportunity. It also follows that compliance with these limits is not a “safe harbor” for the facility. If evidence clearly shows that a grandfathered source has undergone a “modification” as defined in

2-1-234.3, the District would consider that a preconstruction review-triggering event, notwithstanding compliance with the throughput limit in the Title V permit. In other words, the protection afforded the facility by complying with the throughput limit in the Title V permit is only as strong as the information on which it was based. There is no Title V “permit shield” associated with throughput limits for grandfathered sources, as they are being proposed. A shield may be provided if the District determines with certainty that a particular limit is appropriate for purposes of 2-1-234.3.

Conditions that are obsolete or that have no regulatory basis have been deleted from the permit.

Conditions have also been deleted due to the following:

- Redundancy in recordkeeping requirements.
- Redundancy in other conditions, regulations and rules.
- The condition has been superseded by other regulations and rules.
- The equipment has been taken out of service or is exempt.
- The event has already occurred (i.e. initial or start-up source tests).

The regulatory basis is listed following each condition. The regulatory basis may be a rule or regulation. The District is also using the following terms for regulatory basis:

- BACT: This term is used for a condition imposed by the Air Pollution Control Officer (APCO) to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.
- Cumulative Increase: This term is used for a condition imposed by the APCO that limits a source’s operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- Offsets: This term is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.
- PSD: This term is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit issued pursuant to Regulation 2, Rule 2.
- Regulation 2-5 or Toxics: This term is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District’s Regulation 2, Rule 5.

Parametric monitoring requirement(s) has been added for each new abatement device (A- 4502, A-4503, A-4504, A-216, A-221, A-242) to assure compliance with the applicable requirements. The parametric monitoring for these devices is a Triboflow broken bag leak detector or a manometer, which measures pressure drop across the baghouse.

Changes to permit:

- Language in each permit condition was changed to identify the owner/operator as the persons subject to the condition
- Condition # 603 was modified per NSR # 18535
- Condition # 804 was deleted because Part 1 (abatement requirement) is redundant with Condition # 603 Part 1 and Condition # 804 Part 2 (PM mass limit) is redundant with Condition # 2786 Part B.
- Condition # 805 – included explanation that Condition # 805 will be replaced by Condition # 23896 with the startup of S-605 (which will replace S-201); S-202 will also be subject to Condition #23896
- Condition # 1004 was deleted and S-172 was combined in Condition # 603
- Condition # 1545 description of A-211 was corrected
- Condition # 1720 was deleted since all sources subject to this condition were deleted

- Condition # 2786 B was added PM annual source test requirement for Title V review completeness and descriptions of sources were changed from “Feed Mills” to “Raw Mills” for S-141 and S-142 and “Coal Drying” to “Fuel Drying” for S-171 and S-172.
- Condition # 2786 source descriptions were corrected, Part A.1. Basis was added as Cumulative Increase, Part A.4. “Kaiser” was deleted
- Condition #4996 Part 3 was corrected to limit PM10 from existing baghouses A-217 and A-231
- Condition #4996 Part 4 was added to limit PM10 from new baghouses abating S-216, S-221, and S-242 to BACT level of 0.0013 gr/dscf per NSR Application # 17534
- Condition #4996 Part 5 was added per NSR Application # 17534
- Condition #4996 Part 6 was modified to require recordkeeping of pressure drop across each baghouse along with hours of operation per NSR Application # 17534
- Condition # 11780 name of facility was changed to Lehigh Southwest Cement Company, NOx was written out, Part C.2. “effected” was corrected to “affected”, Part E.1. reference to Part (d)(1) was corrected to Part D.1. in NSR Application # 18535
- Condition # 16109: S-56 was deleted. Part 2a was changed to Part 2. Part 2b was deleted since these requirements are redundant to Condition # 20751 Parts 1, 2, and 3b. Part 5 was detailed to include source numbers for cement loadout sources (S-45, S-46, and S-47 are used for onsite delivery of cement to silos).
- Condition # 17352 was deleted since the sources subject to this condition are now exempt
- Condition # 17918 was deleted since all sources subject to this condition were deleted
- Condition # 18474 was deleted since the source was deleted
- Condition # 18855 was deleted and replaced with Condition # 24375 since these emergency standby diesel engines are subject to California Health and Safety Code Title 17, Section 93115: Airborne Toxic Control Measure for Stationary Compression Ignition Engines
- Condition # 20026 was deleted since the source was deleted
- Condition # 20751:
 - S-21/A-13 was added since it was previously omitted
 - S-111, 112, 113, 115, 121, 122, 123, 131, 132, 134, 135, 141, 142, 143, 144, 151, 153, 154, 161, 162, 163, 164, 165, 171, 172, 218 were added since they were previously omitted
 - S-415/A-415 was added to part 1 and Part 3b to require installation of manometer and quarterly pressure drop recordkeeping per Title V renewal review
 - S-56, S-57, S-166, S-173, S-174, S-203, S-214, S-215, S-441, S-442 and their abatement devices were deleted since the sources were deleted
 - Part 2 was replaced with the pressure drop limits for each baghouse
- Condition # 20753
 - S-21/A-13 were added since they were previously omitted
 - S-173, S-174, S-203, S-214, S-215, were deleted since the sources were deleted
- Condition # 21345 Part 2 requirement to equip baghouse with manometer was deleted and moved to Condition # 20751 Part 1 for consistency per Title V renewal review
- Condition # 23416 was added per TV # 16867/NSR # 15217
- Condition # 23896 was added per NSR #15572
- Condition # 23942 was added per TV # 17734/NSR #15342
- Condition # 24375 replaces Condition # 18855
- Condition # 24297 was added per NSR# 20199
- Condition # 24298 was added per NSR# 20199

VII. Applicable Limits and Compliance Monitoring Requirements

This section was deleted and combined with Section IV.

The combined Section IV and VII of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring.

The District has reviewed all monitoring and has determined the existing monitoring is adequate with the following exceptions.

The tables below contain only the limits for which there is no monitoring or inadequate monitoring in the applicable requirements. The District has examined the monitoring for other limits and has determined that monitoring is adequate to provide a reasonable assurance of compliance. Calculations for potential to emit will be provided in the discussion when no monitoring is proposed due to the size of a source.

Monitoring decisions are typically the result of a balancing of several different factors including: 1) the likelihood of a violation given the characteristics of normal operation, 2) degree of variability in the operation and in the control device, if there is one, 3) the potential severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) whether there is some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question.

These factors are the same as those historically applied by the District in developing monitoring for applicable requirements. It follows that, although Title V calls for a re-examination of all monitoring, there is a presumption that these factors have been appropriately balanced and incorporated in the District's prior rule development and/or permit issuance. It is possible that, where a rule or permit requirement has historically had no monitoring associated with it, no monitoring may still be appropriate in the Title V permit if, for instance, there is little likelihood of a violation. Compliance behavior and associated costs of compliance are determined in part by the frequency and nature of associated monitoring requirements. As a result, the District will generally revise the nature or frequency of monitoring requirements only when it can support a conclusion that existing monitoring is inadequate. No additional criteria pollutant monitoring was required for the pre-calciner kiln (S-154), however, to quantify the emissions of NO_x, CO, and SO₂, the District required installation of six new flow meters for S-141, S-142, S-154, S-171 and S-172.

PM Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S-141, S-142, 154, S-161, S-171, S-172	SIP 6-311	FILTERABLE PARTICULATE $4.10P^{0.67}$ lb/hr where P is process weight, ton/hr	Annual Source Test
S-141, S-142, 154, S-161, S-171, S-172	BAAQMD Condition # 2786 B	S-141, S-142, S-154 = 36 lbs/hr & 0.02 gr/dscf; S-161 = 8 lbs/hr & 0.01 gr/dscf; S-171, S-172 = 6.6 lbs/hr & 0.02 gr/dscf	Annual Source Test

PM Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S-100, S-444, S-600, S-606, S-607	SIP 6-301	OPACITY Ringelmann 1.0 for < 3 min/hr	N
S-501 and S-502	SIP 6-303	OPACITY Ringelmann 2.0 for < 3 min/hr	N
S-17, S-19, S-45, S-46, S-47, S-48, S-49, S-50, S-54, S-55, S-111, S-112, S-113, S-115, S-121, S-122, S-123, S-131, S-132, S-134, S-135, S-143, S-144, S-151, S-153, S-162, S-163, S-164, S-165, S-210, S-211, S-216, S-217, S-218, S-220, S-221, S-222, S-230, S-231, S-240, S-242, S-243, S-244, S-245, S-340, S-341, S-342, S-343, S-383, S-384, S-390, S-412, S-414, S-415, S-501, S-502, S-600, S-602, S-603, S-604, S-605	SIP 6-310 and SIP 6-311	FILTERABLE PARTICULATE 0.15 gr/dscf FILTERABLE PARTICULATE $4.10P^{0.67}$ lb/hr where P is process weight, ton/hr	N

PM Discussion:

The addition of annual PM source test for sources S-141, S-142, S-154, S-161, S-171 and S-172 were required as a result of the Title V renewal review. The annual source test requirement is adequate because previous source tests have consistently demonstrated compliance with the applicable requirement.

S-100, S-176, S-187, S-201, S-202, S-444, S-601, S-606, S-607 are subject to opacity standards in SIP 6-301. No monitoring is required since these sources are abated by water sprays and are expected to continue to comply with the opacity standards.

Particulate Weight Limitation and Allowable Rate of Emissions Based on Process Weight Rate. BAAQMD Regulation 6-310 limits filterable particulate (FP) emissions from any source to 0.15 grains per dry standard cubic foot (gr/dscf) of exhaust volume. These are the “grain loading” standards.

S-17, S-19, S-45, S-46, S-47, S-48, S-49, S-50, S-54, S-55, S-111, S-112, S-113, S-115, S-121, S-122, S-123, S-131, S-132, S-134, S-135, S-143, S-144, S-151, S-153, S-162, S-163, S-164, S-165, S-210, S-211, S-216, S-217, S-218, S-220, S-221, S-222, S-230, S-231, S-240, S-242, S-243, S-244, S-245, S-340, S-341, S-342, S-343, S-383, S-384, S-390, S-412, S-414, S-415, S-501, S-502, S-602, S-603. S-604 and S-605 are subject to particulate weight limitations in SIP 6-310 and SIP 6-311. These sources are abated by baghouses/dust collectors, which typically comply with the grain loading of 0.15 grains per dry standard cubic foot (gr/dscf) of exhaust volume in SIP 6-310 and the particulate weight limitations in SIP 6-311. Pressure drop monitoring and/or broken bag leak detection are used to monitor baghouse function and is expected to be adequate for compliance with the particulate weight limitations in SIP 6-310 and SIP 6-311.

S-600 is subject to opacity standards in SIP 6-301 and particulate weight limitations in SIP 6-310 and SIP 6-311. The source is expected to be in compliance with these requirements because the blasting operation is below surface level and the plume is contained within the pit. No visible emissions can be viewed above surface level.

Diesel Backup Generators (S-501 and S-502) Monitoring for Regulation 6-310

Reference: Order Item III.G.5.c on page 38 of the order.

BAAQMD Regulation 6-310 limits grain loading to 0.15 grains per dry standard cubic foot. As discussed below, periodic monitoring is not justified for the engines. Diesel engines S-501 and S-502 are for emergency backup purposes. S-501 and S-502 provide emergency electrical power to the control room.

No periodic monitoring is justified for these engines for three reasons: (1) potential to emit is low, (2) grain loading is unlikely to exceed the Regulation 6-310 limit, and (3) CAPCOA/CARB/EPA Region IX guidance does not recommend periodic monitoring for this type of source. Each of these reasons is discussed in greater detail below.

First, the potential to emit (PTE) for particulate for these engines is low. The following table shows the emissions using the factor of 0.0022 lb PM₁₀/hp-hr for diesel engines in Chapter 3, Stationary Internal Combustion Engines, of AP-42, Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Area Sources, Fifth Edition. Each engine is assumed to operate for 500 hours, using the guidance in John Seitz' memo of September 6, 1995 entitled Calculating Potential to Emit (PTE) for Emergency Generators, which states that "...500 hours is an appropriate default assumption for estimating the number of hours that an emergency generator could be expected to operate under worst-case conditions."

Diesel Engine Potential to Emit – Particulate Matter			
Source #	HP	lb/yr @ 500 hr/yr	tons/yr @ 500 hr/yr
501	1100	1,210	0.605
502	2168	2,385	1.192

Diesel Engine Potential to Emit – Particulate Matter			
Source #	HP	lb/yr @ 500 hr/yr	tons/yr @ 500 hr/yr
Total			1.797

The emissions would likely be lower than the above estimates because engines in California generally use low-sulfur fuel containing less than 0.05% S, which lowers emissions, but by an unknown amount. In addition, all four engines are subject to BAAQMD Regulation 9-8-330 that limits the non-emergency hours of operation to no more than 100 hours. (EPA makes the point on page 39 of the order that the limit on hours of operation is not federally enforceable. It should be noted that in the 1995 *National Mining Association v. EPA* case, the court decided that limits did not have to be federally enforceable to limit potential to emit. EPA's treatment of a state-only limit as ineffective is contrary to case law.) Moreover, the recently enacted California Air Resources Board Airborne Toxics Control Measure for Stationary Compression Ignition Engines will significantly reduce the S-243 engine hours of operation for maintenance and reliability purposes. In a good year (i.e. one with no fires or power outages), total engine operation could be 20% (or less) of the 500 hours per year used in the Potential to Emit calculations above.

Second, grain loading is not likely to exceed the limit in BAAQMD Regulation 6-310. BAAQMD Regulation 6-310 limits PM emissions to 0.15 gr/dscf. If it is assumed that the Diesel engine exhaust gases contain 15% excess oxygen under normal operating conditions, the BAAQMD Regulation 6-310 limit can be compared to the AP-42 PM emission factor as follows:

From 40 CFR 60, Appendix A, Method 19, Table 19-1, a stoichiometric dry gas combustion factor of 9,190 dscf/MMBTU is given for distillate oil combustion. At 15% excess O₂ this factor becomes:

$$9,190 \times [21\% / (21\% - 15\%)] = 32,165 \text{ dscf (combustion products) / MMBTU}$$

The conversion of 0.15 gr/dscf @ 15% O₂ to lb/MMBTU is then:

$$(32,165 \text{ dscf/MMBTU}) \times (0.15 \text{ gr/dscf}) \times (\text{lb}/7,000 \text{ gr}) = 0.689 \text{ lb/MMBTU}$$

In the absence of actual emissions data for these engines, the District considers the AP-42 PM₁₀ emission factor for diesel IC engines to be representative. From AP-42 Table 3.3-1, "Emission Factors For Uncontrolled Gasoline And Diesel Industrial Engines", the PM₁₀ emission factor (based on fuel consumption) is 0.31 lb/MMBTU. Since this assumed emission factor is well below the converted BAAQMD Regulation 6-310 emission rate, compliance is assumed.

Third, the "CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources" dated July 2001 recommends that the only monitoring necessary for grain-loading for non-utility distillate-oil-fueled emergency piston-type IC engines is recordkeeping for fuel usage, which is already required for these engines.

SO₂ Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
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SO₂ Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S-154, S-501, S-502	BAAQMD 9-1-301	Ground level concentrations of SO ₂ shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours	N
S-501, S-502	BAAQMD 9-1-304	Sulfur content of fuel < 0.5% by weight	N

SO₂ Discussion:

BAAQMD Regulation 9-1-301

Area monitoring to demonstrate compliance with the ground level SO₂ concentration requirements of Regulation 9-1-301 is at the discretion of the APCO (per BAAQMD Regulation 9-1-501). S-501 and S-502 Emergency Standby Diesel Generators are required by the California Air Resources Board to use diesel with a sulfur limit of 0.0015% by weight. These engines are only run periodically and with ultra low sulfur diesel, so compliance with 9-1-301 and 9-1-304 is expected.

This facility has a CEM to monitor SO₂ from S-154 Precalciner Kiln, and compliance with permit condition # 2786 (limiting SO₂ emissions). The fuel used at S-154 is subject to Regulation 9-1-304 (limiting sulfur content of fuel), which requires a quarterly analysis and reporting. Therefore, compliance with 9-1-301 ground level concentrations of SO₂ is expected.

Lead Discussion:

Lead Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
P-111, P-112, P-113, P-115	BAAQMD 11-1-301	Lead from emission points ≤15 pounds per day	N

P-111, P-112, P-113, P-115 are subject to lead standards in BAAQMD Regulation 11-1-301. These sources are abated by baghouses/dust collectors, which typically perform with a grain loading less than 0.02 gr/dscf. With this level of control efficiency, lead emissions are not expected to be greater than 15 pounds per day.

THC Discussion:

THC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S-154	NESHAP 40 CFR Part 63, Subpart LLL Section 63.1344(f)	Minimize THC from fuel combustion	N

S-154 is expected to be in compliance with NESHAP 40 CFR Part 63, Subpart LLL Section 63.1344(f) since the source is inspected as part of NESHAP requirements under §63.1350(i) and reported semi-annually per §63.1354(b)(9)(iv). Lehigh is conducting the following Annual Combustion System Inspection to ensure good combustion: Inspect the combustion system of the kilns (S-154) and in-line kiln/raw mills (S-141 and S-142) at least once per year to ensure the specific components of the combustion system are sufficient for maintaining good combustion practices. Inspect burner pipe for erosion, corrosion, plugging, or other alterations that may adversely affect performance. Inspect the closed-loop milling systems grinding balls, grinding rings, and other parts for wear.

VIII. Test Methods

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not “applicable requirements” as defined by Regulation 2-6-202.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section IV of the permit.

Changes to Permit:

- Test method citations were corrected from MOP, Volume VI to Volume IV
- Test method for 8-7-302 (Vapor Tight) was added since it was previously omitted
- Condition # 804 was deleted because Part 1 (abatement requirement) is redundant with Condition # 603 Part 1 and Condition # 804 Part 2 (PM mass limit) is redundant with Condition # 2786 Part B.
- Condition # 1720 was deleted because the sources were deleted
- Condition # 16109 Part 2 was deleted from Test Methods because the condition was redundant to Condition # 20751
- Condition # 17918 were deleted because the sources were deleted
- Condition # 18474 was deleted because the sources were deleted
- Condition # 20026 was deleted because the sources were deleted
- Condition # 24298 was added with CARB Executive Order VR-203 for test methods for vapor integrity requirements for Phase II Vapor Recovery System

IX. Permit Shield:

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in a major facility review permit explaining that specific federally enforceable regulations and standards do not apply to a source or group of sources, or (2) A provision in a major facility review

permit explaining that specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting are subsumed because other applicable requirements for monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits.

The second type of permit shield is allowed by EPA's "White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program." The District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in Title V permits. The District's program does not allow other types of streamlining in Title V permits.

This facility has the first type of permit shield.
This permit has no streamlining.

Following is the detail of the permit shields that were requested by the applicant.

1. The following permit shields are allowed:

Table IX A-1
Permit Shield for Non-applicable Requirements
S-176 ROCK PLANT 1 STORAGE PILE, S-187 (AKA S-187) HOPPER AND STORAGE BIN,
S-201 PRIMARY CRUSHER, S-202 SECONDARY CRUSHER, S-370 Aggregate Additive
Transfer System with Silo abated by A-370 Water Spray , S-383 Rock Plant 2 Conveyors
abated by A-384 Baghouse, S-384 Rock Plant 2 Screens abated by A-384 Baghouse, S-390
Conveyor abated by A-390 Baghouse, S-601 Rock Hopper (9-DH-1) abated by Water
Spray A-4501

Citation	Title or Description (Reason not applicable)
NSPS 40 CFR, Part 60, Subpart OOO	Standards of Performance for Nonmetallic Mineral Processing Plants (Date of original construction or last modification prior to the effective date (August 31, 1983) of this regulation.)

Table IX A-2

Permit Shield for Non-applicable Requirements

S-17 CLINKER TRANSFER AREA, S-19 CLINKER STORAGE AREA, S-21 ROLL PRESS CLINKER SURGE BIN AND FEEDER, S-45 WEST SILO TOP CEMENT DISTRIBUTION TOWER, S-46 MIDDLE SILO TOP DISTRIBUTION TOWER, S-47 EAST SILO TOP DISTRIBUTION TOWER, S-48 BULK CEMENT LOAD OUT TANK #1 & 2, S-49 BULK CEMENT LOADOUT TANK #28, S-50 BULK CEMENT LOADOUT TANK #29, S-54 CEMENT PACKER #1, S-55 CEMENT PACKER #2, S-74 TYPE II MECHANICAL TRANSFER SYSTEM, S-141 RAW MILL (4-GM-1), S-142 RAWMILL 2 (4-GM-2), S-143 RAWMILL 1 SEPARATOR SYSTEM (4-SE-3), S-144 RAWMILL 2 SEPARATOR CIRCUIT (4-SE-4), S-151 HOMONGENIZER (5-S-1-2), S-153 KILN FEED SYSTEM, S-154 PRECALCINER KILN, S-161 CLINKER COOLER (5-CC-1), S-162 CLINKER SILO (5-S-11), S-163 CLINKER SILO (5-S-12), S-164 FREE LIME STORAGE BIN, S-165 CLINKER TRANSFER SYSTEM, S-210 FINISH MILL, S-211 SEPARATOR (6-SE-2), S-216 CLINKER CAKE CONVEYOR (6-GM-1), S-217 CLINKER CAKE CONVEYOR (6-GM-1), S-218 AIR SEPARATOR (6-GM-1), S-220 FINISH MILL (6-GM-2), S-221 CLINKER CAKE FEEDER (6-GM-2), S-222 6-GM-2 GYPSUM FEEDER (6-WF-4), S-230 HYDRAULIC ROLLER PRESS (6-RP-1), S-231 CLINKER CEMENT PRESSED CAKE BIN, 240 ADDITIVE CONVEYOR/BINS, S-242 CLINKER CAKE FEEDER (6-GM-1), S-S-243 GYPSUM FEEDER (6-GM-1), S-244 POZZOLAN FEEDER, S-245 CLAY FEEDER (6-WF-9), S-301 RAIL LOADOUT SYSTEM, S-412 FINISH MILL ADDITIVE BIN (6-GM-3), S-414 KILN DUST ADDITIVE BIN. S-415 FINISH MILL BUILDING CONVEYOR, S-444 EMERGENCY CLINKER CONVEYOR

Citation	Title or Description (Reason not applicable)
NSPS 40 CFR, Part 60 Subpart F et.al	Standards of Performance for Portland Cement Plants (NESHAP 40 CFR, Part 63 Subpart LLL et.al.superceeds the NSPS)

Changes to permit:

- The standard language in the Section IX, Permit Shield, was updated.
- Table IX A-1:
 - o S-201 was deleted from Permit Shield because the source was deleted.
 - o S-202 was deleted from Permit Shield because the source shares an abatement device with a new source and emissions cannot be distinguished between the sources. S-202 was listed in the Permit Shield from NSPS requirements, however, since emissions will be emitted through the same stack as S-604, which is subject to NSPS, S-202 will now be subject to NSPS Subpart OOO requirements.
 - o S-370, S-383, S-384, S-390, and S-601 were added since they are grandfathered sources and the dates of original construction were prior to the effective date of NSPS Subpart OOO (August 31, 1983)
- Table IX A-2:
 - o S-21, S-415 were added since they were previously omitted
 - o S-444 was added because it was a new source

- o S-56 and S-57 were deleted because the sources were deleted

X. Glossary

Changes to permit:

- Added definition of Recordkeeping Protocol, RP: The owner/operator shall keep the records onsite for at least five years and shall make the records available to District staff upon request.
- Added definition of CARB E.O. = California Air Resources Board Executive Order

XI. Revision History

Changes to permit:

- Application 16867, Minor Revision was added
- Application 17947, Title V renewal was added

XII. State Implementation Plan

Changes to permit:

This section has been deleted. The address for EPA's website is now found in Sections III and IV.

D. Alternate Operating Scenarios:

No alternate operating scenario has been requested for this facility.

E. Compliance Status:

An inter-office memorandum from the Director of Compliance and Enforcement, to the Director of Engineering Division, presents a review of the compliance record of Lehigh Southwest Cement Company (Site #A0017). The Compliance and Enforcement Division staff has reviewed the records for Lehigh Southwest Cement Company for the period between July 1, 2004 through June 30, 2009. This review was initiated as part of the District evaluation of an application by Lehigh Southwest Cement Company for a Title V permit renewal. During the period subject to review, activities known to the District include:

- There were 18 Notices of Violation issued during this review period.
- The District received 15 alleged air pollution complaints, but none of these complaints were confirmed.
- The District received 4 notifications for reportable compliance activities (including 1 monitor excess and 3 inoperative monitors).
- The facility is not operating under a Variance or an Order of Abatement from the District Board.

The owner certified that all equipment was operating in compliance on November 26, 2008, and amended by Lehigh on July 23, 2009. There is no evidence of on-going non-compliance and no recurring pattern of violations that would warrant consideration of a Title V compliance schedule.

F. Differences between the Application and the Proposed Permit:

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company
24001 Stevens Creek Boulevard Cupertino, CA 95014

None.

APPENDIX A
BAAQMD COMPLIANCE REPORT

COMPLIANCE & ENFORCEMENT DIVISION

Inter-Office Memorandum

August 11, 2009

TO: BRIAN BATEMAN – DIRECTOR OF ENGINEERING

FROM: KELLY WEE – DIRECTOR OF ENFORCEMENT 

SUBJECT: REVIEW OF COMPLIANCE RECORD OF:

LEHIGH SOUTHWEST CEMENT CO.- PERMANENTE PLANT, SITE #A0017

Background

This review was initiated as part of the District evaluation of an application by Lehigh Southwest Cement Co. - Permanente Plant for a Title V Permit Renewal. It is standard practice of the Compliance and Enforcement Division to undertake a compliance review in advance of a renewal of a Title V Permit to Operate. The purpose of this review is to assure that any non-compliance problems identified during the prior five-year permit term have been adequately addressed by returning the facility to compliance, or, if non-compliance persists, that a schedule of compliance is properly incorporated into the Title V permit compliance schedule. In addition, the review checks for patterns of recurring violation that may be addressed by additional permit terms. Finally, the review is intended to recommend, if necessary, any additional permit conditions and limitations to improve compliance.

Compliance Review

Staff reviewed Lehigh Southwest Cement Co. – Permanente Plant Annual Compliance Certifications for July 1, 2004 to June 30, 2009 and found no ongoing non-compliance and no recurring pattern of violations.

The District has conducted a compliance review of 18 Notices of Violation (NOVs) issued to Lehigh Southwest Cement Co. from July 1, 2004 through June 30, 2009. While the cement manufacturing facility received a number of violations over this 5-year period, for facilities as large, complex, and heavily-regulated as a cement manufacturing facility within the Bay Area Air Quality Management District's jurisdiction, violations are likely to occur. It is important to note that all of the violations associated with the NOVs were in compliance at the time of this review. Furthermore, the District's analysis of the NOVs for the 5-year period indicated that there is no ongoing violation or pattern of recurring violation that would require a compliance schedule.

REVIEW OF COMPLIANCE RECORD OF:

LEHIGH SOUTHWEST CEMENT CO. – PERMANENTE PLANT SITE #A0017

August 11, 2009

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Understanding how the District handles the violations associated with the NOV's is important to understanding how the District evaluated the facility's compliance status. Whenever the District discovers a violation, it begins a two-step process. The first step is to end the violation and bring the alleged violator back into compliance. Once compliance is achieved, the second step is to proceed with penalty assessment. It is District policy to not proceed with penalty assessment until compliance has been achieved. If a facility has not achieved compliance in a timely fashion, the District proceeds with additional enforcement action. The vast majority of Notice of Violation penalties are resolved through settlement negotiations.

The results of the District's compliance review are shown in Table I. As stated above, the violations associated with the 18 NOV's were in compliance at the time of this review. In 85% of the violations, compliance was achieved prior to or within 1 day of issuance of the NOV. In the remaining 15% of the violations, the violations achieved compliance after issuance but did not represent ongoing violation that would require a compliance schedule in a Title V permit. There were multiple violations at two of the sources but causal analysis indicated different causes for the violations and there was no recurrent pattern, the prevention of which might be addressed by new monitoring or other permit conditions. Of the 18 NOV's issued, 15% of the violations resulted from the facility self-reporting, pursuant to Title V requirements. Based on this review and analysis of all the violations for the 5-year period, the District has concluded that no schedule of compliance or change in permit terms is necessary beyond what is already contained in the cement manufacturing facility's Title V permit, as the record showed that the violations returned to compliance, were intermittent or did not evidence ongoing non-compliance, there was no pattern of recurring violation, and the facility was in compliance at the time of this review.

The violation details associated with the 18 Notices of Violation (20 violations) are summarized here and detailed in Table 1.

Emissions Violations

- Six (6) visible emissions violations occurred on the Clinker Handling System (Source #165) for unrelated reasons such as polyester bag problems, damaged Kevlar skirting, a damaged gasket, and excessive dust accumulation around the source.
- One visible emissions violation occurred during an emergency diversion of clinker from the Clinker Handling System.
- One visible emissions violation occurred from 2 broken bags in the Kiln Mill (Source #154) dust collector and another occurred during a startup after a power outage shutdown, which resulted in fine raw clinker material flushing from the precalcining tower through the kiln into the Clinker Cooler (Source #161).
- One excess emission violation occurred at the kiln (Source #154) for a two-hour NOx exceedance.
- One permit condition throughput violation occurred at the Rock Plant for excessive combined throughput at several sources.

REVIEW OF COMPLIANCE RECORD OF:

LEHIGH SOUTHWEST CEMENT CO. - PERMANENTE PLANT SITE #A0017

August 11, 2009

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Administrative Violations

- One violation occurred for failure to maintain quarterly manometer readings on the Cement Packers (Source #54/55).
- One violation occurred for missing visible emission inspection forms.
- One violation occurred for missing visible emission, pressure drop and surface wet records.
- One violation occurred for missing visible emission inspection forms, pressure drop records, and late deviation reporting.
- Two violations occurred for late reporting of Reportable Compliance Activity (RCA)¹: late reporting of a NOx excess and late reporting of an inoperative monitor.
- Two violations occurred for failure to submit deviation reports as required in their Title V permit.

Permit Violations

- Two permit violations occurred for several stockpiles of material that did not have permits when moisture content was determined to be below 5%. The permit application was subsequently filed and the permit issued.

Staff also reviewed additional District compliance records for Lehigh Southwest Cement Co. - Permanente Plant for July 1, 2008 through June 30, 2009. During this period Lehigh Southwest Cement Co. - Permanente Plant activities known to the District include:

The District received fifteen (15) air pollution complaints alleging Lehigh Southwest Cement Co. - Permanente Plant as the source. None of these complaints were confirmed.

The District received four (4) notifications for Reportable Compliance Activities (RCA): three (3) inoperative NOx monitor and one (1) NOx monitor indicated excess. None of the RCAs resulted in NOVs.

There are no enforcement agreements, open variances, or open abatement orders for Lehigh Southwest Cement Co. - Permanente Plant.

¹ Reportable Compliance Activity (RCA), also known as "Episode" reporting, is the reporting of compliance activities involving a facility or company as outlined in District Regulations 1, 8-28, 9-1&2, and State Law. Reporting covers breakdown relief, continuous emission monitoring excesses, ground level monitoring excesses, parametric monitoring excesses, inoperative monitors, and pressure relief device releases.

REVIEW OF COMPLIANCE RECORD OF:

LEHIGH SOUTHWEST CEMENT CO. - PERMANENTE PLANT SITE #A0017

August 11, 2009

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Conclusion

The Compliance and Enforcement Division has made a determination that for the five-year period Lehigh Southwest Cement Co. - Permanente Plant was in intermittent compliance. There is no evidence of on-going non-compliance and no recurring pattern of violations that would warrant consideration of a Title V permit compliance schedule or additional permit terms. The Division does not have any recommendations for any additional permit conditions and limitations to improve compliance beyond what is already contained in the Title V Permit under consideration.

JLK:JMM:KJW

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company
24001 Stevens Creek Boulevard Cupertino, CA 95014

BAAQMD Notices of Violation

Lehigh Southwest Cement Co.-Permanente Plant (Site #A0017)

July 1, 2004 - June 30, 2009

TABLE 1

V#	S#	Occur	Issued	Reg	Violation Comments	Compliance Achieved	Basis for no compliance schedule
A48540	55	7/11/2002	9/25/2007	2-6-307	No quarterly manometer reading usage record.	9/25/2007	This administrative violation was for missing quarterly manometer readings for cement bag packing machines for 13 quarters. Compliance was achieved following staffing changes and the quarterly manometer recordkeeping resumed.
A11835	203	8/12/2004	7/21/2005	2-1-307	Condition ID #1720.3 - 4,200 Tons/Day	8/19/2004	This violation occurred when combined throughput at several sources at the Rock Plant exceeded the permit condition limit of 4,200 tons/day for 4 days. Compliance was achieved within 7 days and combined throughputs remain below the amount limited by the permit condition.
A48536	141	11/1/2005	1/25/2007	2-6-307	Missing visible emission records for 12 sources	10/30/2006	This administrative violation was for missing visible emission inspection forms for 12 sources over an 11-month period caused by staffing changes and turnovers. The violation was identified and self-reported by the facility. Compliance was achieved when the facility resumed maintaining daily visible emission inspection forms, instituted additional quality assurance and control procedures, and incorporated new procedures into personnel objectives.
A47925	N/A	5/9/2006	5/24/2006	6-301	Exceeded Ringelmann 1 visible emission	5/11/2006	This violation of excessive dust emissions occurred during an emergency diversion from the main clinker bucket conveyor. Compliance was achieved within two days by expediting repairs of the main clinker bucket conveyor so that emergency diversion was no longer necessary.
A48527	165	8/10/2006	8/22/2006	2-6-307	Visible Emission Ringelmann 1.5 thru 3 for 14.5 Minutes	8/11/2006	This violation of excessive dust emissions occurred due to an abatement problem involving polyester bags in the baghouse. Compliance was achieved within 1 day when the polyester bags in the baghouse were replaced with Teflon bags and adjustments were made to airflow dampers.
A48528	165	8/21/2006	8/22/2006	2-6-307	Visible Emission Ringelmann 1.5 thru 3 for 15.25 Minutes	8/22/2006	This violation occurred at the Clinker Handling System bucket conveyor and was caused by fine clinker material sticking to the side of the buckets. Compliance was achieved within 1 day when the fine material deposited at the ground adjacent to the bucket turnaround point was cleaned up. The facility incorporated new inspection procedures into the Operation & Maintenance plan and enhanced housekeeping around the source. This violation was unrelated to a previous violation at this source.
A48529	165	9/18/2006	9/25/2006	2-6-307	Non-Compliance Major Facility Visible Emission Exceeding Ringelmann 1.5 thru 3 for 15 Minutes	9/25/2006	This violation occurred at the Clinker Handling System bucket conveyor and was caused by damaged Kevlar skirting on the outside of the bucket conveyor. It was corrected within 7 days when the damaged Kevlar skirting on the outside of the bucket conveyor was replaced. Skirting inspection was added to the inspection check list and enhanced inspection details were added to newly designed software that has since been implemented at the facility.

August 11, 2009

1

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company
24001 Stevens Creek Boulevard Cupertino, CA 95014

BAAQMD Notices of Violation

Lehigh Southwest Cement Co.-Permanente Plant (Site #A0017)

July 1, 2004 - June 30, 2009

TABLE 1

V#	S#	Occur	Issued	Reg	Violation Comments	Compliance Achieved	Basis for no compliance schedule
A48534	165	5/18/2006	12/1/2006	2-6-307	Covers 4 NOV Issued Bet. 5/18/06 to 9/18/06	12/1/2006	This administrative violation was for failure to submit 10 and 30-day deviation reports as required in the Title V permit, resulting from the issuance of NOVs A47925, A48527-A48529. The violation was corrected on the date that the NOV was issued when the required reports were submitted.
A48543	350	1/6/2006	2/22/2008	2-6-307	Missing visible emission, pressure drop and surface wet condition monitoring records at 70 sources	2/22/2008	This administrative violation was for missing visible emission inspection forms, pressure drop readings and surface wet monitoring for 70 sources over a 12-month period, caused by staffing changes and turnovers. The violation was identified and self-reported by the facility. Compliance was achieved when the facility resumed maintaining the visible emission inspection forms, pressure drop and surface wet records and instituted additional quality assurance and control procedures.
A48541	165	8/20/2007	9/25/2007	2-6-307	Visible Emission > Ringelmann 1	8/25/2007	This violation of excessive dust emissions occurred at the Clinker Handling System when the access door gasket developed a gap. Compliance was achieved within 5 days when the gasket and casing at the access door were repaired.
A48550	154	11/1/2007	7/31/2008	2-6-307	Missing visible emission and pressure drop records at 20 sources & failure to notify deviation	8/8/2008	This administrative violation was for missing visible emission inspection forms and pressure drop readings for 20 sources over a 6-month period and late deviation reporting, caused by staffing changes and turnovers. The violation was identified and self-reported by the facility. Compliance was achieved when the facility resumed maintaining the visible emission inspection forms, pressure drop records and instituted additional quality assurance and control procedures.
A48545	154	1/30/2008	5/22/2008	2-6-307, 1-522.7	NOx excess of 821 ppm (limit<=615ppm) and late reporting of indicated excesses	5/22/2008	This violation occurred for a short duration of 2 hours of excessive NOx emissions from the kiln, as recorded on the continuous emission monitor. Compliance was achieved when NOx emissions dropped below the level limited by the permit condition. The administrative violation related to the late reporting of the NOx excess.
A50005	new 607	10/16/2008	11/20/2008	2-1-301, 2-1-302	Moisture content <5% therefore permit req'd	1/13/2009	This violation was for no Authority to Construct or Permit to Operate unpermitted stockpiles. Compliance was achieved when a permit application was filed and the permit issued.
A50006	154	10/11/2008	2/4/2009	1-522.4	Failure to report equipment inoperation	10/20/2008	This administrative violation was for the late reporting of an inoperative NOx continuous emission monitor.
A50008	154	3/5/2009	4/7/2009	2-6-307	Exceed Ringelmann 1 visible emission	3/5/2009	This violation of excessive dust emissions occurred due to an abatement device problem involving 2 fiberglass bags in the baghouse. Compliance was achieved the same day when the bags were replaced with new ePTFE membrane bags. Prior to restarting the unit, all bags in that compartment were fully inspected and prioritized for June 2009 replacement.

August 11, 2009

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Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company
24001 Stevens Creek Boulevard Cupertino, CA 95014

BAAQMD Notices of Violation

Lehigh Southwest Cement Co.-Permanente Plant (Site #A0017)

July 1, 2004 - June 30, 2009

TABLE 1

V#	S#	Occur	Issued	Reg	Violation Comments	Compliance Achieved	Basis for no compliance schedule
A50009	165	3/5/2009	4/7/2009	2-6-307	Exceeded Ringelmann 1 visible emission	3/5/2009	This violation of excessive dust emissions occurred for a short period at the clinker cooler bucket elevator discharge point the day that kiln operations resumed after a 2-1/2 month shutdown. Compliance was achieved during the investigation when the violation ended.
A50010	161	3/23/2009	4/7/2009	2-6-307	Exceeded Ringelmann 1 visible emission	3/23/2009	This violation of excessive dust emissions occurred when operations restarted following a power outage shutdown which resulted in fine, raw clinker material flushing from the precalcining tower through the kiln into the clinker cooler. Compliance was achieved when the fine materials were flushed through the process.
A50011	165	3/26/2009	4/7/2009	2-6-307	Exceeded Ringelmann 1 visible emission	3/27/2009	This violation of excessive dust emissions occurred when the wind entrained fine clinker dust accumulated around the conveyor system. Compliance was achieved when plant personnel removed the accumulated material, watered down the immediate area and instituted enhanced housekeeping procedures.

August 11, 2009

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APPENDIX B

GLOSSARY

ACT

Federal Clean Air Act

APCO

Air Pollution Control Officer

ARB

Air Resources Board

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

Basis

The underlying authority which allows the District to impose requirements.

CAA

The federal Clean Air Act

CAAQS

California Ambient Air Quality Standards

CAM

Compliance Assurance Monitoring per 40 CFR, Part 64

CAPCOA

California Air Pollution Control Officers Association

CEM

Continuous Emission Monitor

CEQA

California Environmental Quality Act

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO

Carbon Monoxide

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Cumulative increase is used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District regulations.

Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR, Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (MACT), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

FP

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by 40 CFR, Part 63.

Major Facility

A facility with potential emissions of: (1) at least 100 tons per year of regulated air pollutants, (2) at least 10 tons per year of any single hazardous air pollutant, and/or (3) at least 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity of hazardous air pollutants as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Federal Clean Air Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NAAQS

National Ambient Air Quality Standards

NESHAPS

National Emission Standards for Hazardous Air Pollutants. See in 40 CFR, Parts 61 and 63.

NMHC

Non-methane Hydrocarbons (Same as NMOC)

NMOC

Non-methane Organic Compounds (Same as NMHC)

NO_x

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Federal Clean Air Act, and implemented by 40 CFR, Part 60 and District Regulation 10.

NSR

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR, Parts 51 and 52 and District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of POC, NOx, PM10, and SO2.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR, 72 from Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

Particulate Matter

PM10

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR, Part 52 and District Regulation 2, Rule 2.

PTE

Potential to Emit as defined by BAAQMD Regulation 2-6-218

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO2

Sulfur dioxide

THC

Total Hydrocarbons (NMHC + Methane)

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

TOC

Total Organic Compounds (NMOC + Methane, Same as THC)

TPH

Total Petroleum Hydrocarbons

TRMP

Toxic Risk Management Plan

TSP

Total Suspended Particulate

VOC

Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
cu. ft.	=	cubic foot
cfm	=	cubic feet per minute
dscf	=	dry standard cubic foot
dscfm	=	dry standard cubic foot per minute
g	=	gram
gal	=	gallon
gpm	=	gallons per minute
gr	=	grain
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inch
max	=	maximum
m ²	=	square meter
min	=	minute
mm	=	million
MMbtu	=	million btu
MMcf	=	million cubic feet
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company
24001 Stevens Creek Boulevard Cupertino, CA 95014

scfm = standard cubic feet per minute
tpy = tons per year
yr = year

Appendix C – NSR Permit Evaluations

Appendix C
NSR Permit Evaluations

**Title V Permit Evaluation, Plant #17
24001 Stevens Creek Blvd, Cupertino 94566**

BACKGROUND

Title V Permit Evaluation (HPC) has submitted this application for a Permit to Operate for the following source:

**S-444 Emergency Clinker Conveyor, 230 tph abated by
A-444 Water Spray**

S-444 has operated at HPC since 1981, when the plant was last modernized. HPC has always considered this conveyor as part of its S-17, Clinker Transfer Area and S-165, Clinker Transfer System and did not identify it as a separate source for its Title V permit. After a discussion with the Compliance and Enforcement Division and the Permit Division on 6/12/06, HPC has agreed to identify S-444 as a separate source, independent of S-17 and S-165. Since this is not a new source with new emissions, S-444 will be added to HPC's Title V permit when it is renewed or modified.

EMISSIONS SUMMARY

Basis: Permit condition limit of 75,000 tons of cement clinker per year
AP-42 Chapter 11.19.2 (Crushed Stone Processing) for conveyor emission
Assume 70% water spray control efficiency
maximum capacity of 230 tons/hr

$(75,000 \text{ tons/yr}) (0.0011 \text{ lb/ton}) (1-0.70) = 24.75 \text{ lb/yr} = 0.012 \text{ tpy PM}_{10}$

$(230 \text{ tons/hr}) (24 \text{ hr/day}) (0.0011 \text{ lb/ton}) (1-0.70) = 1.82 \text{ lb/highest day PM}_{10}$

PLANT CUMULATIVE INCREASE (Post 4/5/91):

The cumulative increase including this application is $0.000 \text{ (existing)} + 0.012 \text{ (new)} = 0.012 \text{ tpy PM}_{10}$.

TOXIC RISK SCREENING ANALYSIS

The cement clinker dust at S-415 is not expected to contain any chemical that exceeds its toxic risk trigger level listed Table 2-1-316 in Regulation 2-1. A toxic risk screen is not needed for this application.

BACT ANALYSIS

Per Regulation 2-2-301.1, this source does not trigger BACT because, even if operated at 24 hours per day, it emits less than 10.0 pound per day.

OFFSET ANALYSIS

Per Regulation 2-2-303, since the Post 4/5/91 PM-10 Cumulative Increase ($0.000 + 0.012 = 0.012 \text{ tpy}$) is less than 1.0 tpy, emission offsets are not required.

STATEMENT OF COMPLIANCE

Because S-444, Emergency Clinker Conveyor is abated by A-444, Water Spray, it is expected to comply with the requirements of Regulations 6-301 (Ringelmann No. 1 limitation) and 6-302 (Opacity).

This project is considered to be ministerial under the District's CEQA Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors and therefore is not discretionary as defined by CEQA (Permit Handbook chapter 11.7).

This project is over 1000 feet from the nearest school and is therefore not subject to the public notification requirements of Reg 2-1-412.

BACT, PSD, NSPS, and NESHAPS are not triggered in this project.

CONDITIONS

For S-444 Emergency Clinker Diversion Conveyor

1. Visible particulate emissions from S-444 shall not exceed Ringelmann 1.0 or result in fallout on adjacent property in such quantities as to cause a public nuisance per Regulation 1-301. (Basis: Regulation 1-301)
2. All of the particulate emissions emitted from the handling of clinker for S-444 shall be abated by water spray system A-444. (Basis: Regulation 2-2-212 Cumulative Increase)
3. The total throughput of clinker processed at S-444 shall not exceed 75,000 tons in any rolling 365 consecutive day period. (Basis: Regulation 2-2-212 Cumulative Increase)
4. The owner/operator of S-444 shall record, on a daily basis, the total throughput of clinker to demonstrate compliance with part 3. These records shall be entered in a District approved log and retained for a period of at least five years from date of entry. These logs shall be kept on site and made available to the District upon request. (Basis: Cumulative Increase)
(Cumulative Increase)

RECOMMENDATION

Issue a Permit to Operate for the following equipment:

**S-444 Emergency Clinker Conveyor, 230 tph abated by
A-444 Water Spray**

S-444 and A-444 will be added to the Title V permit in its next renewal or modification permit.

By: _____
Eric Y. W. Chan
Air Quality Engineer II

Date

EVALUATION REPORT
HANSON PERMANENTE CEMENT
Application #17534 - Plant #17

24001 Steven Creek Blvd.
Cupertino, CA 95014

I. BACKGROUND

Hanson Permanente Cement (HPC) has applied for an Authority to Construct/Permit to Operate for the following abatement equipment:

- A-216 Dust Collector 6DC13, GE, 2,400 cfm to abate existing S-216, 6-GM-1 Cake Conveyor (6-BC-13)**
- A-221 Dust Collector 6DC6, GE, 2,400 cfm to abate existing S-221, 6-GM-2 Cake Feeder (6-WF-2)**
- A-242 Dust Collector 6DC11, GE, 2,400 cfm to abate existing S-242, 6-GM-1 Cake Feeder (6-WF-3)**

HPC has replaced its existing A-216, A-221 and A-242 Baghouses that were abating S-216, S-221 and S-242 Cake feeders and conveyor with three new Dust Collectors for better dust collection and safety. These new horizontal pulse jet dust collectors have a specified particulate control efficiency of 99.99% from the manufacturer, and will be larger than the one that they replaced. The existing dust collectors are designed at 1,500 cfm (A-242), 1,325 cfm (A-221), and 875 cfm (A-216). The existing dust collectors are conditioned to meet the outlet grain loading of 0.006 grain/dscf each, while the new ones are designed at 2,400 cfm and 0.0013 grain/dscf each. HPC submitted the manufacturer's warranty of the dust collector emission performance (0.0013 grain/dscf) from GE Energy's letter dated April 14, 2008, and zero visible emission observations. There will not be any increase in throughput. This application will result in emission reduction of PM10 since the new dust collectors are expected to perform better than the old ones. HPC will submit the application for this minor revision to its TV permit at a later time.

II. EMISSION CALCULATIONS

No emission increases due to replacement of the above abatement devices. The following emissions are calculated just for information. Emission factors are based on the applicant proposed outlet grain loading of 0.0013 grain/dscf and 2,400 cfm for each dust collector.

S-216 Existing PM10 Annual Emissions:

Max. Annual PM10 emissions = 0.006 gr/dscf X 1 lb/7000 grain X 875 ft³/min X (60 X 24 X 7 X 52) min/yr = 393 lb/yr

S-221 Existing PM10 Annual Emissions:

Max. Annual PM10 emissions = 0.006 gr/dscf X 1 lb/7000 grain X 1,325 ft³/min X (60 X 24 X 7 X 52) min/yr = 595 lb/yr

S-242 Existing PM10 Annual Emissions:

Max. Annual PM10 emissions = 0.006 gr/dscf X 1 lb/7000 grain X 1,500 ft³/min X (60 X 24 X 7 X 52) min/yr = 674 lb/yr

S-216 or S-221 or S-242 Future PM10 Annual Emissions:

Max. Annual PM10 emissions = 0.0013 gr/dscf X 1 lb/7000 grain X 2,400 ft³/min X (60 X 24 X 7 X 52) min/yr = 234 lb/yr

S-216 or S-221 or S-242 Future PM₁₀ Daily Emissions:

Maximum Daily PM₁₀ emissions = 0.0013 gr/dscf X 1 lb/7000 grain X 2,400 ft³/min X 60 min/hr
X 24 hr/day = 0.64 lbs/day

III. PLANT CUMULATIVE INCREASE SINCE 4/5/91

No emissions are added to the plant's cumulative increase for this permit application. No new emissions of any pollutant will be generated as a result of replacement of the new dust collectors, A-216, A-221 and A-242.

IV. TOXIC SCREENING ANALYSIS

A risk screen is not required for this project because there is no increase in emissions of toxic substances from this application.

V. BEST AVAILABLE CONTROL TECHNOLOGY

The replacement of an abatement device does not trigger BACT since there are no PM₁₀ emission increases.

VI. OFFSETS

N/A

VII. STATEMENT OF COMPLIANCE

Sources S-216, S-221 and S-242 should continue to comply with the requirements of District Regulation 1-301 "Public Nuisance" and District Regulation 6 "Particulate Matter and Visible Emissions". The sources that are abated by the replaced baghouses are conditionally permitted to meet these requirements.

Sources S-216, S-221 and S-242 are expected to continue to comply with NSPS Subpart F, Portland Cement Plants and NESHAP Subpart LLL, National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry.

This project is considered to be categorically exempt from CEQA under Regulation 2-1-312.7 for replacement or reconstruction of existing sources or facilities where the new source or facility will be located on the same site as the source or facility replaced and will have substantially the same purpose and capacity as the source or facility replaced.

This project is over 1,000 ft from the nearest public school and is therefore not subject to the public notification requirements of Regulation 2-1-412.

A toxic risk screening analysis is not required.

Offsets, PSD, NSPS, and NESHAPS are not triggered.

VIII. CONDITIONS

COND# 4996

For S-216 Clinker Cake Conveyor (6-BC-13), S-217 Clinker Cake Conveyor (6-BC-15), S-221 Clinker Cake Feeder (6-WF-2), S-231 Clinker Cake Storage Silo (6-SS-2), S-242 Clinker Cake Feeder (6-WF-3)

1. Visible particulate emissions from each source (S-216, S-217, S-221, S-231, S-242) shall not exceed Ringelmann 0.51.0 for more than 3 minutes in any hour, or result in fallout on adjacent property in such quantities as to cause a public nuisance per Regulation 1-301. (Basis: BACTRegulation 6, Regulation 1-301)
2. All of the particulate emissions emitted from the handling of cement for the sources identified in Part #1 shall flow under negative pressure to a Baghouse, (A-216 (6-DC-13), A-217 (6-DC-15), A-221 (6-DC-6), A-231 (6-DC-3), A-242 (6-DC-11), respectively). Each Baghouse shall be equipped with a District approved manometer for measuring the pressure drop across the Baghouse. (Basis: Regulation 2-2-212 Cumulative Increase)
3. The outlet grain loading for each Baghouse shall not exceed 0.~~006~~0013 grain/dscf. (Basis: Regulation 2-2-301.1 BACTCumulative Increase)
4. To demonstrate compliance with the emission limit in Part #3, the owner/operator shall perform a PM10 source test using CARB Method 501, USEPA Method 201/201A, or District approved equivalent at one of these abatement devices (A-216, A-221, or A-242), within 45 days of receiving the condition change for these sources. If the test result shows a failure to meet the limit in Part #3, then source tests shall also be performed on the other two abatement devices. The results shall be delivered to the District no later than 30 days from the date of the test. (basis: Regulation 2-1-403)Deleted (startup condition)
5. The owner/operator shall maintain daily records of the hours of operation and of the pressure drop across each baghouse, in a District approved log, ~~for the total hours of operation~~. This log shall be retained for a period of at least five years from date of first entry. This log shall be kept on site and made available to the District's staff upon request. (Basis: Cumulative Increase)

IX. RECOMMENDATION

Issue a conditional change to the Permit to Operate to Hanson Permanente Cement for the following abatement devices:

A-216 Dust Collector 6DC13, GE, 2,400 cfm to abate existing S-216, 6-GM-1 Cake Conveyor (6-BC-13)

A-221 Dust Collector 6DC6, GE, 2,400 cfm to abate existing S-221, 6-GM-2 Cake Feeder (6-WF-2)

A-242 Dust Collector 6DC11, GE, 2,400 cfm to abate existing S-242, 6-GM-1 Cake Feeder (6-WF-3)

Thu H. Bui
Air Quality Engineer II
Permit Services Division
Date:_____

**Hanson Permanente Cement, Plant #17
24001 Stevens Creek Blvd, Cupertino 94566**

BACKGROUND

Hanson Permanente Cement (HPC) has submitted this application for a Permit to Operate for the following sources that make up its non-metallic rock crushing facility:

- S-202 Symmons 7' Cone Crusher (9-CR-13) abated by Torit Shaking Baghouse Filter A-4502**
(This is an existing source with new baghouse)
- S-601 Rock Hopper (9-DH-1) abated by Water Spray A-4501**
- S-602 Conveyor System (9-PAF-1, 9-BC-1, 9-BC-2)**
abated by Torit Shaking Baghouse Filters A-4502, A-4503, A-4504
- S-603 Vibrating Grizzly (9-VG-1) abated by Torit Shaking Baghouse Filter A-4503**
(S-601, 602, and 603 are existing sources that have operated at the site since prior to 1972, but for some reason were not listed as sources when the plant was first permitted. Back fees have been charged for these grandfathered sources)
- S-604 Vibrating Screen (9-VS-2) abated by Torit Shaking Baghouse Filter A-4502**
(This is the existing source S-203 relocated from another part of the plant – HPC has requested a new source number for it)
- S-605 Jaw Crusher (9-CR-1) abated by Torit Shaking Baghouse Filter A-4503**
(This will replace the existing S-201)

HPC is relocating the non-metallic rock crushing facility to another area within its plant boundaries. HPC will replace the existing S-201 with a new jaw crusher (S-605) and relocate the existing S-202 cone crusher. While planning for the relocation of its rock crushing facility, HPC discovered that it had three additional sources (S-601, S-602 and S-603) in need of a permit. These sources have been in operation prior to 1972 and will be treated as grandfathered sources.

HPC will also relocate another existing source, S-203 (vibrating screen) from its mineral aggregate processing facility to the non-metallic rock crushing facility. HPC has requested that the source number for S-203 be changed to S-604.

This project is not part of the quarry relocation project. That project is undergoing an Environmental Impact Report being prepared by the County of Santa Clara.

EMISSIONS SUMMARY

Two sets of calculations are presented. The first set uses the AP42 Chapter 11-19 emission factors. The second uses the grain-loading limit for the baghouse filters.

AP-42 factors: Based on maximum equipment throughput and 24 hr/day, 365 day/yr operation, and AP-42 Table 11-19-2-2 emission factors for Crushed Stone Processing Operations. Use 99.5% PM-10 removal efficiency per filter manufacturer and assume 70% abatement efficiency for water spray A-4501. Per note “n” in Table 11-19-2-2, use the tertiary crusher emission factor as the upper limit emission for S-605 and S-202, although it is expected that the larger particles at the primary and secondary crushers will result in less PM-10 emissions.

Source	Source	emiss.	Throughp	Abateme	Controlle	Controlled
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Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company, 24001
Stevens Creek Boulevard Cupertino, CA 95014

e #		fac. lb/ton	ut Tph	nt	d lb/day	tpy
202	Secondary Crusher (moved)	0.0024	1135	0.005	0.33	0.060
601	Hopper (unpermitted)	0.000016	1800	0.3	0.21	0.038
602	Conveyors (4) (unpermitted)	0.0044	1800	0.005	0.95	0.173
603	Vibrating Grizzly (unpermitted)	0.0087	1800	0.005	1.88	0.343
604	Vibrating Screens (was S-203)	0.0087	1800	0.005	1.88	0.343
605	Primary Crusher (new)	0.0024	1135	0.005	0.33	0.060
Total					5.57	1.017

Grain-loading limit: Based on maximum grain-loading factor per permit condition

grain loading: 0.0013 gr/dscf

Abate- ment Device	Sources abated	cfm	lb/hr	lb/day PM10	Tpy PM10
4501	601 (Hopper)	Water Spray	0.009	0.21	0.038
4502	202 (Sec Crusher), 602 (Conveyors), 604 (Screens)	10000	0.11	2.67	0.488
4503	605 (Pri Crusher), 602 (Conveyors), 603 (Grizzly)	9000	0.10	2.41	0.439
4504	602 (Conveyors)	1500	0.02	0.40	0.073
	total from A-4501, A-4502, 4503, 4504			5.69	1.038

There is a not much difference in emissions calculated between the two methods. Since the grain loading from the baghouse filters can be measured and has greater accuracy, it is the method that will be used to estimate the emissions in this application.

Emission factors based on throughput are required to complete the District's data forms. To back calculate the emission factors prior to abatement for S-202, S-602, S-603, S-604, and S-605 assume the emissions from S-602 is spread out evenly among each baghouse filter and use the ratios from expected emissions from the first table. (For S-605, use the AP42 Table 11-19-2-2 factor for hopper S-601, which is abated by water spray A-4501).

Source #	PM10 tpy	PM10 lb/day	EmFac lb/ton
202	0.063	0.35	0.003
601	0.038	0.21	4.8 E-6
602	0.190	1.04	0.005
603	0.327	1.79	0.008
604	0.364	1.99	0.009
605	0.057	0.31	0.002
Total	1.038	5.69	

Only S-201 will be replaced in this application. The S-201 primary crusher will be replaced with a new one (S-605). Per the attached Databank emission calculations and Title V application tables, neither S-201 nor S-202 had abatement devices. The latest Databank emission calculation (effective 12/31/04) is 5.5 lb/day for either S-201 or S-202 with a throughput of 3,741,990 tons per year, or 427 ton per hour. Since the relocated S-202 and the new replaced crusher S-605 will be abated with new efficient

filters (A-4502, and A-4503) that can remove 99.5% or more of PM-10 from these sources, there will be a net decrease in PM10 emissions due to this application.

The existing S-202 crusher is currently not abated. The existing un-permitted S-601, 602, and 603 are currently abated by water spray A-4501. Once relocated, the S-202 crusher will be abated by a new baghouse filter (A-4502). The S-601 rock hopper will continue to be abated by A-4501 water spray. Sources S-602 and S-603 will be abated by new baghouse filters (A-4502, and A-4503) with at least 99.5% PM10 removal efficiency, so their emission will also decrease.

The existing S-203 (to be renumbered as S-604), is currently abated by a dust collector. Once relocated, its old dust collector will also be replaced abated by a new baghouse filter (A-4504) with at least 99.5% PM10 removal efficiency. Its emissions should not increase because of the higher control efficiency baghouse.

There will not be any net emission increase due to this permit application. The emission increase from the new source S-605 will be fully offset by the onsite emission reduction credit from the shutdown of the old source S-201. The emission reduction calculation is shown under the Offset Analysis section below.

PLANT CUMULATIVE INCREASE (Post 4/5/91):

The new S-605 (1135 tph) has a smaller capacity than source S-201, the existing one (1500 tph). The existing S-201 is not abated by a baghouse. The new crusher, S-605, is abated by a baghouse filter, A-4503. There is a net emission reduction of 10,196 lbs PM10/yr from replacing the old crusher (S-201) with the new crusher (S-605).

Source S-202 has been unabated and will now be abated with a baghouse filter, A-4502. S-601 will continue to be abated by water spray. S-602 and 603 will be abated by baghouse filters instead of water sprays, which will decrease their emissions. S-604 will continue to be abated by a baghouse filter, and the new baghouse filter will be more efficient than the old one. (Since sources S-601, S-602 and S-603 are grandfathered, they are not subject to the cumulative increase.)

TOXIC RISK SCREENING ANALYSIS

A toxic risk screen is not required for this project per Regulation 2-5 because: (1) there are no toxic emission increases from S-202, S-604 and S-605 and (2) Sources S-601, S-602 and S-603 are grandfathered sources that continue to operate without any changes of toxic emissions.

BACT ANALYSIS

Per Regulation 2-2-301.1, S-605 does not trigger BACT because, even if operated for 24 hours per day, it would emit less than 10.0 pound per day.

The other sources (S-202, S-601, S-602, S-603 and S-604) are not subject to BACT because they are not new or modified.

OFFSET ANALYSIS

The emissions from the new source S-605 replacing S-201 need to be offset since it is a new source. The emission reduction credit comes from the shutdown of S-201 using a 3-year baseline from the throughput information provided to the District along with EPA AP-42 emission factors.

Contemporaneous Emission Reduction Credits:

<u>S-201</u>	2007 rock throughput	1,423,851 tons/yr
	2006 rock throughput	4,255,779 tons/yr
	2005 rock throughput	<u>7,208,113 tons/yr</u>
	Average	4,295,914 tons/yr

Annual emissions = 4,295,914 tons/yr X 0.0024 lb PM10/ton = 10,310 lb PM10/yr

Net Emission Decreases

Net emission decreases are the emissions from the new source minus any onsite contemporaneous emission reduction credits.

$$114 \text{ lb PM10/yr} - 10,310 \text{ lb PM10/yr} = -10,196 \text{ lb PM10/yr}$$

Offsets are not required for PM10 emissions per Regulation 2, Rule 2-303 because there is an emission reduction in this application.

STATEMENT OF COMPLIANCE

Because the sources at the non-metallic rock crushing facility (S-202, S-601, S-602, S-603, S-604 and S-605) are abated by baghouse filters or water spray, they are expected to comply with the requirements of Regulations 6-301 (Ringelmann No. 1 limitation) and 6-302 (Opacity). Regulation 10 incorporates Federal New Source Performance Standards (NSPS) by reference. One of these standards applies to this project:

Nonmetallic Mineral Processing Plants - 40 CFR, Part 60 Subpart OOO: the opacity limits, which are usually met with water spray or other abatement, and delineates requirements for visual inspection, recordkeeping, and reporting. The opacity limit of 15% for crushers S-202 and S-605 should be easily met through the use of the A-4502 and A-4503 baghouse filter abatement systems.

This project is considered to be ministerial under the District's CEQA Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors and therefore is not discretionary as defined by CEQA (Permit Handbook chapter 11.7).

This project is over 1000 feet from the nearest school and is therefore not subject to the public notification requirements of Reg 2-1-412.

BACT, PSD, and NESHAPS are not triggered for this project.

CONDITION # 23896

For:

S-202 Symmons 7' Cone Crusher (9-CR-13) abated by Torit Shaking Baghouse Filter A-4502

S-601 Rock Hopper (9-DH-1) abated by Water Spray A-4501

S-602 Conveyor System (9-PAF-1, 9-BC-1, 9-BC-2)

abated by Torit Shaking Baghouse Filters A-4502, A-4503, A-4504

S-603 Vibrating Grizzly (9-VG-1) abated by Torit Shaking Baghouse Filter A-4503

S-604 Vibrating Screen (9-VS-2) abated by Torit Shaking Baghouse Filter A-4502

S-605 Jaw Crusher (9-CR-1) abated by Torit Shaking Baghouse Filter A-4503

1. The owner/operator shall abate each of these sources with their respective abatement devices as listed above. (Basis: Regulation 2-2-212 Cumulative Increase)
2. Visible particulate matter emissions from these sources shall not exceed Ringelmann 1.0 or result in fallout on adjacent property in such quantities as to cause a public nuisance per Regulation 1-301. (Basis: Cumulative Increase, Regulation 6, Regulation 1-301)
3. The outlet grain loading for A-4503 Baghouse shall not exceed 0.0013 grain/dscf. (Basis: Cumulative Increase)
4. The owner/operator of these sources shall maintain daily records, in a District approved log, for the total throughput of ground material and hours of operation. These records shall be retained for a period of at least five years from date of first entry. This log shall be kept on site and made available to the District's staff upon request. (Basis: Cumulative Increase)
5. A-4502, A-4503, and A-4504 shall each be equipped with a District-approved broken bag detection device, equivalent to a Triboflow leak detector, which shall include an alarm that is triggered when the device signals the current has exceeded the allowable limit established in Part #8. If the alarm is triggered, the owner/operator shall perform a Method 22 test within one hour of the alarm. Except for a 20-minute period after equipment startup and shutdown, if emissions are observed per Method 22, then the owner/operator shall record the event as an exceedance in a District-approved log. Any exceedance shall also be reported to the Director of Compliance and Enforcement in accordance with the requirements in Standard Condition I.F. (NESHAPS, Regulation 2-6-501, BAAQMD MOP Volume II, Part 3, §4.7)
6. The owner/operator shall keep the exceedance records for at least 5 years and shall make the records available to District staff upon request. (Regulation 2-6-501)
7. To demonstrate compliance with the emission limit in Part #3, the owner/operator shall perform a PM10 source test using CARB Method 501, USEPA Method 201/201A, or District approved equivalent at A-4503 within 45 days of startup of the source. The results shall be delivered to the District no later than 30 days from the date of the test. (basis: Regulation 2-1-403)

8. Within 45 days of startup of these sources, the owner/operator shall determine the maximum allowable current for each baghouse filter (A-4502, A-4503, and A-4504) for broken bag detection. The owner/operator shall report the limit to the District for inclusion of the limit into this permit condition. During this time period, Method 22 tests shall be performed at each baghouse daily to ensure that they are operating properly. (basis: NESHAPS, Regulation 2-6-501, BAAQMD MOP Volume II, Part 3, §4.7)

RECOMMENDATION

Issue a conditional Authority to Construct for the following equipment:

- S-202 Symmons 7' Cone Crusher (9-CR-13) abated by Torit Shaking Baghouse Filter A-4502**
- S-602 Conveyor System (9-PAF-1, 9-BC-1, 9-BC-2)**
abated by Torit Shaking Baghouse Filters A-4502, A-4503, A-4504
- S-603 Vibrating Grizzly (9-VG-1) abated by Torit Shaking Baghouse Filter A-4503**
- S-604 Vibrating Screen (9-VS-2) abated by Torit Shaking Baghouse Filter A-4502**
- S-605 Jaw Crusher (9-CR-1) abated by Torit Shaking Baghouse Filter A-4503**

Issue a conditional Permit to Operate for the following equipment:

S-601 Rock Hopper (9-DH-1) abated by Water Spray A-4501

Add these changes into HPC's Title V permit during its next minor revision.
Renumber S-203 to S-604.

By: _____

Thu H. Bui
Senior Air Quality Engineer

Date

ENGINEERING EVALUATION
Hanson Permanente Cement Co.
Banking Application # 15216 - Plant #17

I. Introduction

Hanson Permanente Cement Co. (Hanson) has applied for Emission Reduction Credits (ERCs) for the following equipment:

S-204 Tunnel Conveyor with 2 Belt Conveyors
S-205 Conveying System with 10 Belt Conveyors
S-206 5 Sand and Aggregate Piles
S-215 Screen
S-440 Surge Bin/Belt Feeder
S-441 Crusher
S-442 Screen
S-443 Conveying System with 6 Belt Conveyors

The above sources (S-204, S-205, S-206, S-215, S-440, S-441, S-442, S-443) at Hanson have been permanently shutdown due to the closure of the Mineral Aggregate Plant. These sources were permanently shut down on January 1, 2006.

Hanson has requested the following emission reduction credits:

Emissions Reduction Credits Requested (tons/year)

Source #	PM10
204	0.0393
205	0.0077
206	0.0210
215	0.1123
440	0.0700
441	0.5580
442	0.9290
443	0.1610
Total	1.8983

II. Emissions

Per Regulation 2-2-605:

2-2-605 Emission Calculation Procedures, Emission Reduction Credits: The following methodology shall be used to calculate emission reduction credits.

- 605.1 The baseline period consists of the 3 year period immediately preceding the date that the application is complete (or shorter period if the source is less than 3 years old). The applicant must have sufficient verifiable records of the source's operation to substantiate the emission rate and throughput during the entire baseline period.
- 605.2 Baseline throughput is the lesser of:
 - 2.1 actual average throughput during the baseline period; or
 - 2.2 average permitted throughput during the baseline period, if limited by permit condition.
- 605.3 Baseline emission rate, expressed in the units of mass of emissions per unit of throughput, is the average actual emission rate during the baseline period.

Periods where the actual emission rate exceeded regulatory or permitted limits shall be excluded from the average.

605.4 Baseline Throughput and Emission Rate - Fully Offset Source: For a source which has, contained in a permit condition, an emission cap or emission rate which has been fully offset by the facility (without using emission reductions from the Small Facility Banking Account), the baseline throughput and baseline emission rate shall be based on the levels allowed by the permit condition.

605.5 The adjusted baseline emission rate shall be determined by adjusting the baseline emission rate downward, if necessary, to comply with the most stringent of RACT, BARCT, and District rules and regulations in effect or contained in the most recently adopted Clean Air Plan.

605.6 Emission reduction credits shall be the difference between the adjusted baseline emission rate times the baseline throughput, and the emission cap or emission rate accepted by the applicant as a federally enforceable limiting conditions.

(Amended 6/15/94; 5/17/00)

All fees were paid on May 9, 2008 and the application was deemed complete. As a result, the 3-year baseline period is May 1, 2005 through April 30, 2008. The applicant has provided sufficient verifiable records of the sources' operation to substantiate the emission rate and throughput during the entire baseline period.

S-204 Tunnel Conveyor with 2 Belt Conveyors

S-205 Conveying System with 10 Belt Conveyors

The emission factor for determining any allowable PM10 credit for S-204 and S-205 came from:

EPA AP-42, August 2004, Table 11.19.2-2 "Emission Factors for Crushed Stone Processing Operations"

The sources were abated by water sprays A-2040 and A-2050, respectively. The controlled conveyor transfer point emission factor of 4.6E-5 lb PM10/transfer point/ton aggregate was used. The monthly throughput data are shown in Appendix A. The annual average PM10 emissions for the 3-year baseline period are 0.0077 TPY and 0.0210 TPY, respectively. No adjustment for any stricter local, state, or federal requirement per Regulation 2-2-605.5 is needed.

S-206 5 Sand and Aggregate Piles

The emission factor for determining any allowable PM10 credit for S-206 came from:

EPA AP-42, November 2006, Section 13.2.4.3 "Aggregate Handling and Storage Piles: Predictive Emission Factor Equations"

The sources were abated by water sprays A-2140, A-2150, A-2030, A-2040 and A-2050 as needed per condition# 1720. To be consistent with Application 7183 in which offsets were surrendered for an increase in throughput at this source, the calculated emission factor assuming a wind speed of 15 mph, a moisture content of 1%, and 80% abatement from water sprays was 2.46E-3 lb PM10/ton aggregate was used. The monthly throughput data are shown in Appendix A. The annual average PM10 emissions for the 3-year baseline period are 0.1123 TPY. No adjustment for any stricter local, state, or federal requirement per Regulation 2-2-605.5 is needed.

S-215 Screen

The PM10 emissions for the 3-year baseline period (May 2005 to April 2008) are 0.0393 TPY for S-215. The source was abated by baghouse A-215. The baghouse had an air flow rate of 1000 cfm and was assumed to have an outlet grain loading of 0.015 gr/dscf to be consistent with District practice for old baghouses without source test data (see Application 1753 Evaluation Report, page 5). PM emissions were calculated using operating hours for the mineral aggregate plant provided by Hanson, which are shown in Appendix A. No adjustment for any stricter local, state, or federal requirement per Regulation 2-2-605.5 is needed.

S-440 Surge Bin/Belt Feeder

S-441 Crusher

S-442 Screen

S-443 Conveying System with 6 Belt Conveyors

Sources S-440 through S-443 were fully offset with contemporaneous emission reductions in Application 1753. Permit condition 17918 contains an annual throughput limit for these sources, which is a surrogate for an emissions rate. Per Regulation 2-2-605.4, the baseline throughput and baseline emission rate shall be based on the levels allowed by the permit condition, which totaled 1.718 TPY for these four sources. No adjustment for any stricter local, state, or federal requirement per Regulation 2-2-605.5 is needed.

Summary of Emission Reduction Credits

Emissions Reduction Credits (tons/year)

Source #	PM10
204	0.0393
205	0.0077
206	0.0210
215	0.1123
440	0.0700
441	0.5580
442	0.9290
443	0.1610
Total	1.8983

Statement of Compliance

Per the February 1, 2008 letter from Hanson, informed the District that sources S-203, S-204, S-205, S-206, S-215, S-440, S-441, S-442, S-443 of the Mineral Aggregate Plant ceased operation with the closure of the plant in January 2006. Hence, in accordance with Regulation 2-4-302:

2-4-302 Bankable Reductions for Closures: Emission reduction credits not prohibited by Section 2-4-303 are bankable. The following restrictions apply:

- 302.1 Closure of sources, where the reduction is permanent at the source, but it is unclear whether the reduction will be replaced by an emissions increase elsewhere within the District, are bankable only if the applicant accepts a condition restricting use of the deposits to offsetting emission increases in the same or closely related industries. For example, the closure of public utility power generation facilities could be bankable if use is restricted to offsetting emission increases from other power generation facilities (including resource recovery and cogeneration facilities). Closure of petroleum or petroleum product storage tanks at refineries could be bankable if use is restricted to

offsetting emission increases at other petroleum or petroleum products storage tanks, or to offset emission increases at the associated refinery.

302.2 Issuance of a Banking Certificate for emission reductions resulting from a closure cancels the permit to operate. The reduction shall be enforceable through a condition in the Banking Certificate and through enforcement of Regulation 2-1-302 pertaining to operating without a permit.

302.3 The permanency of closures shall be demonstrated through removal of the source from the District, rendering it inoperative, destruction of the source, or by inclusion of appropriate conditions in the Banking Certificate providing for automatic cancellation of the Banking Certificate if emissions resume and replacement by the applicant of the emission reduction credit if the deposit has been transferred or withdrawn.

(Amended 7/17/91; 6/15/94; 5/17/00)

A banking certificate can be issued to Hanson Permanente Cement because the emission reduction is permanent.

CEQA

This application is considered exempt from the California Environmental Quality Act per the following regulation:

Regulation 2-1-312.10 Applications to deposit emission reductions in the emissions bank pursuant to Regulation 2, Rule 4 or Regulation 2, Rule 9.

Condition

These emission reduction credits shall only be used to offset emission increases at quarries or mineral processing operations. (Basis: Regulation 2-4-302.1)

Recommendation

I recommend that Hanson Permanente Cement Co. be issued a conditional banking certificate for the following total amount due to the permanent shutdown of the Mineral Aggregate Plant at the Hanson Permanente Cement facility in Cupertino, CA:

Emissions Reduction Credits (tons/year)

Source #	PM10
204	0.0393
205	0.0077
206	0.0210
215	0.1123
440	0.0700
441	0.5580
442	0.9290
443	0.1610
Total	1.8983

Kathleen Truesdel
Air Quality Engineer I

Date

Appendix A

1. Hours of Operation for 2005 (used to determine emissions from baghouses that abated S-203 and S-215)
2. Throughput data for S-204
3. Throughput data for S-205 and S-206
4. Offsets Bank Number for S-440, S-441, S-442, S-443
5. EPA AP-42, August 2004, Table 11.19.2-2 "Emission Factors for Crushed Stone Processing Operations"
6. EPA AP-42, November 2006, Section 13.2.4.3 "Aggregate Handling and Storage Piles: Predictive Emission Factor Equations"
7. Emissions calculations spreadsheet

ENGINEERING EVALUATION
Lehigh Southwest Cement
Application #15342- Plant #17

I. BACKGROUND

Lehigh Southwest Cement has applied for an Authority to Construct/Permit to Operate for the following equipment:

S-100 Precalciner Kiln Fuel Handling System abated by A-100 Water Sprays

A-100 Water Sprays at Hopper loading abate S-100 Precalciner Kiln Fuel Handling System

Lehigh is proposing to build a Precalciner Kiln Fuel Handling System, S-100, consisting of two new hoppers, an existing hopper (currently part of S-112) and an extension of an existing conveyor in the Lehigh coal yard. S-100 is designed to allow the facility to better manage the fuel for the precalciner kiln, which includes petroleum coke and coal and separate raw material additives (bauxite, iron, and limestone). The system would allow separation of coal in one hopper, coke in another hopper, and raw mill additives in the existing hopper to more effectively control the mixture ratios of the fuel components. The existing hopper would be reassigned from S-112 to S-100 so throughput data and emissions can be calculated more accurately. S-112 also consists of a downstream transfer point that is abated by baghouse A-112. Unloading from the front-end loaders into the hoppers will be abated by automatic water sprays with sensors. Transfer points from the hoppers with enclosed belts to the conveyor are not abated.

II. EMISSION CALCULATIONS

Particulate emissions from S-100 have been calculated using AP42 emission factors from Section 11.19.2, Crushed Stone Processing. The PM emissions from the handling of coal and coke were assumed to be equivalent. If the kiln is fired on coal, the maximum throughput of coal is 36 tons/hr. The maximum throughput of coke is less than coal due to the heat input limit to the kiln, so 36 tons coal/hr will be used to calculate maximum PM emissions from S-100.

Existing emissions from S-112

Basis:

Maximum throughput = 36 tons/hour coal or 20 tons/hr coke

Operating Schedule: 24 hrs/day, 365 day/yr

Emission Factors (AP-42, Section 11.19.2)

Unloading/loading (1 source) = 0.0001 lb PM10/ton/source

Conveyor Transfer Points (uncontrolled) = 0.0011 lb PM10/ton/source

Unloading and transfer to conveyors points are not abated.

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company, 24001
Stevens Creek Boulevard Cupertino, CA 95014

		# of Points	Emission Factor	Daily Emissions (lb PM10/day)	Annual Emissions (TPY)
COAL 36 ton/hr	Unloading	1	0.0001	0.09	0.0158
	Transfers	1	0.0011	0.95	0.1734
	TOTAL			1.04	0.1892
COKE 20 ton/hr	Unloading	1	0.0001	0.05	0.0088
	Transfers	1	0.0011	0.53	0.0964
	TOTAL			0.58	0.1051
ADDITIVES 30 ton/hr	Unloading	1	0.0001	0.07	0.0131
	Transfers	1	0.0011	0.79	0.1445
	TOTAL			0.86	0.1577
TOTAL				1.90	0.3469
S-112 PM emissions from unloading and transfer to conveyor (FUEL (coal) + ADDITIVES)					

Emissions from Proposed Project S-100

Basis:

Maximum throughput = 36 tons/hour coal or 27 tons/hr coke

The maximum District permitted throughput of coke to the kiln is currently 20 tons/hr, however the facility has applied for an increase in throughput of coke to 27 tons/hr (Application# 16848, currently under review). Therefore, the maximum emissions from coke will be calculated using 27 tons/hr of coke to account for the possibility that 27 tons/hr of coke may be used in the future.

Operating Schedule: 24 hrs/day, 365 day/yr

Emission Factors (AP-42, Section 11.19.2)

Unloading/loading (1 source) = 0.0001 lb PM10/ton/source

Conveyor Transfer Points (uncontrolled) = 0.0011 lb PM10/ton/source

Unloading is abated by water sprays. Transfer from enclosed belts to conveyor is not abated.

		# of Points	Emission Factor	Abatement Efficiency	Daily Emissions (lb PM10/day)	Annual Emissions (TPY)
COAL 36 ton/hr	Unloading	1	0.0001	70%	0.03	0.0047
	Transfers	1	0.0011		0.95	0.1734
	TOTAL				0.98	0.1782
COKE 27 ton/hr	Unloading	1	0.0001	70%	0.02	0.0035
	Transfers	1	0.0011		0.71	0.1301
	TOTAL				0.73	0.1336
ADDITIVES 30 ton/hr	Unloading	1	0.0001	70%	0.02	0.0039
	Transfers	1	0.0011		0.79	0.1445
	TOTAL				0.81	0.1485
TOTAL	S-100 PM emissions				1.79	0.3267

Change in emissions = S-100 emissions minus S-112 emissions from unloading and transfer to conveyor

$$(0.3267 \text{ TPY PM10}) - (0.3469 \text{ TPY PM10}) = -0.0202 \text{ TPY PM10}$$

PM10 emissions will decrease with the proposed project due to abatement with water sprays.

III. PLANT CUMULATIVE INCREASE SINCE 4/5/1991

There will be no increase in emissions with this project.

	Current (TPY)	New (TPY)	New Total (TPY)
POC =	1.405	0	1.405
NO _x =	0	0	0
SO ₂ =	0.029	0	0.029
CO =	0	0	0
PM ₁₀ =	0.012	0	0.012

IV. OFFSETS

Offsets are not required per Regulation 2-2-303 because there is no increase in emissions.

V. TOXIC SCREENING ANALYSIS

A Health Risk Screening Analysis was not conducted because emissions of toxic air contaminants were below the trigger levels in Regulation 2, Rule 5 as seen in the Table below. Emissions from the additives are not new emissions and are not subject to Regulation 2-5.

Hourly emissions were calculated to determine whether S-100 exceeds an acute trigger level. PM₁₀ emissions were calculated assuming maximum throughput from the front-end loaders to the hoppers and from the hoppers to the conveyor. The conveyor maximum capacity is 400 ton/hr.

Material ton/hr	Unloading EF lb PM/ton	Transfer EF lb PM/ton	Emissions lb PM ₁₀ /hr
400	0.00003	0.0011	0.452

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company, 24001
Stevens Creek Boulevard Cupertino, CA 95014

Toxic Air Contaminant Emissions from Coal

Maximum hourly emissions of TACs were calculated based on the capacity of the conveyor (400 ton material/hr). As seen above, at 400 tons of material per hour, 0.452 lb PM10 per hour is emitted. Annual emissions were based on 36 ton/hour of coal. Assuming the composition of PM10 is similar to the composition of the coal, the emissions of TACs are seen below.

TAC	concentration (ppm)	Emissions (lb/hr)	Acute Trigger level (lb/hr)	Risk Screen Triggered?	Emissions (lb/yr)	Chronic Trigger level (lb/hr)	Risk Screen Triggered?
Antimony	3	1.356E-06	-	no	7.20E-05	7.70E+00	no
Arsenic	62.4	2.82E-05	4.20E-04	no	1.50E-03	1.20E-02	no
Barium	248	0.0001121	-	no	5.95E-03	-	no
Beryllium	0.1	4.52E-08	-	no	2.40E-06	8.00E-02	no
Cadmium	2	9.04E-07	-	no	4.80E-05	4.50E-02	no
Chromium	0.4	1.808E-07	-	no	9.60E-06	-	no
Hexavalent Cr (assume 1/7 Cr)		2.583E-08	-	no	1.37E-06	1.30E-03	no
Lead	2	9.04E-07	-	no	4.80E-05	5.40E+00	no
Mercury	1.26	5.695E-07	4.00E-03	no	3.02E-05	5.60E-01	no
Nickel	60.9	2.753E-05	1.30E-02	no	1.46E-03	7.30E-01	no
Selenium	50.4	2.278E-05	-	no	1.21E-03	7.70E+02	no
Silver	0.1	4.52E-08	-	no	2.40E-06	-	no
Thallium	684	0.0003092	-	no	1.64E-02	-	no
Vanadium	17.1	7.729E-06	6.60E-02	no	4.10E-04	-	no
Cobalt	4.3	1.944E-06	-	no	1.03E-04	-	no
Copper	4.46	2.016E-06	2.20E-01	no	1.07E-04	9.30E+01	no
Zinc	11.4	5.153E-06	-	no	2.74E-04	1.40E+03	no
Molybdenum	21.9	9.899E-06	-	no	5.26E-04	-	no
Fluoride	117	5.288E-05	5.30E-01	no	2.81E-03	5.00E+02	no

Toxic Air Contaminant Emissions from Coke

Maximum hourly emissions of TACs were calculated based on the capacity of the conveyor (400 ton material/hr). As seen above, at 400 tons of material per hour, 0.452 lb PM10 per hour is emitted. Annual emissions were based on 27 ton/hour of coke. Assuming the composition of PM10 is similar to the composition of the coke, the emissions of TACs are seen below.

TAC	concentration (ppm)	Emissions (lb/hr)	Acute Trigger level (lb/hr)	Risk Screen Triggered?	Emissions (lb/yr)	Chronic Trigger level (lb/hr)	Risk Screen Triggered?
Arsenic	3.5	0.000001582	4.20E-04	no	6.30E-05	1.20E-02	no
Barium	83.1	3.75612E-05	-	no	1.50E-03	-	no
Beryllium	5.6	2.5312E-06	-	no	1.01E-04	8.00E-02	no
Cadmium	0.5	0.000000226	-	no	9.00E-06	4.50E-02	no
Chromium	9.5	0.000004294	-	no	1.71E-04	-	no
Hexavalent Cr (assume 1/7 Cr)		6.13429E-07	-	no	2.44E-05	1.30E-03	no
Nickel	2700	0.0012204	1.30E-02	no	4.86E-02	7.30E-01	no
Lead	2.5	0.00000113	-	no	4.50E-05	5.40E+00	no
Zinc	24.5	0.000011074	-	no	4.41E-04	1.40E+03	no

VI. BEST AVAILABLE CONTROL TECHNOLOGY

Per Regulation 2-2-301.1, S-100 does not trigger BACT because emissions are not in excess of 10.0 pound per highest day.

VII. NSPS

The coal preparation and handling sources at this facility are subject to 40 CFR 60 Subpart Y, Standards of Performance for Coal Preparation Plants. Section 60.252(c) requires that on and after the sixtieth day after achieving maximum production, but not later than 180 days after initial startup, the owner/operator may not cause any gases to be discharged greater than 20 percent opacity from S-100.

Per Section 60.8, within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, the owner/operator shall conduct performance tests. The owner/operator shall provide the Administrator of EPA at least 30 days prior notice of any performance test to afford the Administrator the opportunity to have an observer present. Per Section 60.254(b)(2), Method 9 and the procedures in Section 60.11 shall be used to determine opacity to determine compliance with Section 60.252(c).

VIII. STATEMENT OF COMPLIANCE

The owner/operator of S-100 is subject and expected to comply with Regulation 6: Particulate Matter. The owner/operator is not expected to allow S-100 to emit any visible emission of three minutes per hour at Ringelmann 1 (Regulation 6-301) or results in fallout on adjacent property in such quantities as to cause public nuisance per Regulation 6-301 and Regulation 1-301.

The project is considered to be ministerial under the District's CEQA regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emissions factors and therefore is not discretionary as defined by CEQA. (Permit Handbook Chapter 11.7)

This project will not to operate within 1,000 ft from the nearest school and is therefore not subject to the public notification requirements of Regulation 2-1-412.

Pursuant to Regulation 2-2-304, this project is not subject to PSD review because this is not a major modification resulting in an increase of 15 tons per year of PM10.

S-100 is subject to and expected to comply with NSPS 40 CFR 60 Subpart Y. The owner operator is not expected to emit any PM emissions greater than 20 percent opacity from S-100.

BACT, NESHAPS are not triggered.

CONDITIONS

Condition #23942

S-100 Precalciner Fuel Handling System abated by A-100 Water Sprays

1. The owner/operator shall not discharge an air contaminant into the atmosphere for a period or periods aggregating more than 3 minutes in any hour, which is as dark or darker than a Ringelmann 1.0. (basis: Regulation 6-301)
2. The owner/operator shall abate S-100 with A-100 water sprays when material is loaded into the hoppers at this source. (basis: Cumulative Increase)
3. All control equipment shall be maintained and kept in good operating condition at all times. (basis: Cumulative Increase)
4. The owner/operator shall maintain records of monthly throughput at S-100 for the following materials in a District approved log:
 - a. Coal
 - b. Coke
 - c. Raw Material Additives

The owner/operator shall keep this log on site for at least five years from the date of entry and make it available to District staff upon request. (basis: Cumulative Increase)

IX. RECOMMENDATION

Issue a conditional Authority to Construct to Lehigh Southwest Cement for the following equipment:

S-100 Precalciner Kiln Fuel Handling System abated by A-100 Water Sprays

A-100 Water Sprays at Hopper loading abate S-100 Precalciner Kiln Fuel Handling System

Kathleen Truesdell
Air Quality Engineer I

**Hanson Permanente Cement, Plant #17
24001 Stevens Creek Blvd, Cupertino 94566
Application 15398**

BACKGROUND

Hanson Permanente Cement (HPC) has submitted this application for a change in permit condition the following sources:

**S-173 Kiln Coke System abated by A-175 Dust Collector
S-174 Precalciner Coke System abated by A-174 Dust Collector**

HPC is applying to modify condition 603 part 2 to increase its allowable coke usage from 8 tons per hour to 20 tons per hour. The coke is used as fuel for the S-154 Precalciner Kiln for cement clinker production.

EMISSIONS SUMMARY

The criteria pollutant emissions should not increase since the coke and coal have similar emission factors. Permit condition #2786 limits the SO₂ emission from the pre-calciner kiln (S-154) to 481 lb/hr and condition #11780 limits the NO_x emission from S-154 to 1158 lb/hr. HPC monitors these emissions with continuous emission monitors.

PLANT CUMULATIVE INCREASE (Post 4/5/91):

The Databank shows the following cumulative increase for this plant.

	tons/year		
	current	new	total
POC	0	0	0
NO _x	0	0	0
SO _x	0.029	0	0.029
CO	0	0	0
NPOC	0	0	0
PM ₁₀	0.012	0	0.012

TOXIC RISK SCREENING ANALYSIS

S-154's petroleum coke combustion emission may contain additional toxic metals as described in the 4/23/07 Toxic Risk Screen Memo. If 100% of the chromium emission is in the form of hexavalent chromium, the cancer risk is 1.2 in a million. As long as the hexavalent chromium emission is limited to 2.84E-05 lb/hr or if the hexavalent chromium content of the petroleum coke is less than 76.6% of the total chromium, the risk would be less than 1 in a million. The chronic hazard index is less than 0.01.

Hanson has submitted a 2001 emission test report for its kiln using petroleum coke. The test results show that the hexavalent chromium only makes up 12% of the total chromium. However, per the attached 6/11/1999 "Total and Hexavalent Chromium Results" for Plant #3243 (GWF Power Systems),

the percent hexavalent chromium as total chromium may be as high as 70% in combustion in a power plant using petroleum coke. This is still lower than the 76.6% limit that will raise the risk to above 1 in a million for this project. HPC has scheduled an extensive toxics source testing program later this year for NESHAPs compliance purposes. It will also test for the hexavalent chromium content from S-154 at this time.

HPC has accepted a permit condition (#603) to limit the hexavalent chromium emission to 2.84E-5 lb/hr. HPC has one primary supplier, ConocoPhillips out of Santa Maria. Within the first 6 months of the issuance of this permit condition change, HPC will perform monthly testing of the coke supply six times to verify the range of chromium content in the coke. Thereafter, it will test for the chromium content quarterly.

BACT ANALYSIS

Since the criteria pollutant emission does not increase, per Regulation 2-2-301.1, this source does not trigger BACT.

OFFSET ANALYSIS

HPC does not have any existing POC or NOx cumulative increase and no new increase as a result of this project. Per Regulation 2-2-303, since the Post 4/5/91 PM-10 cumulative increase ($0.012 + 0.000 = 0.012$ tpy) and SO2 cumulative increase ($0.029 + 0.000 = 0.029$) are each less than 1.0 tpy, emission offsets are not required.

STATEMENT OF COMPLIANCE

Because S-173 (Kiln Coke System) is abated by A-175 Dust Collector, S-174 (Precalciner Coke System) is abated by A-174 Dust Collector, and S-154 (Precalciner Kiln) is abated by Dust Collectors A-141 and A-142 and by Baghouses A-171 and A-172, they are expected to comply with the requirements of Regulations 6-301 (Ringelmann No. 1 limitation) and 6-302 (Opacity).

This project is considered to be exempt from CEQA (California Environmental Quality Act) review because it has no potential for causing a significant adverse environmental impact per Regulation 2-1-312.11.4. It satisfies the "no net emission increase" provisions of District Regulation 2, Rule 2. Permit Condition 603 will limit the hexavalent chromium emission to 2.84e-5 lb/hr so that the project cancer risk will be less than 1.0 in a million. The chronic cancer risk is less than 0.01, much lower than the 0.20 threshold of Reg 2-1-312.11.4. With the higher coke usage, it will be more economical for HPC to bring in the coke via railroad trains rather than trucks, thereby reducing the truck diesel emission. Applicant has submitted a CEQA Environmental Information Form for the project. No potential significant impacts were identified.

This project is over 1000 feet from the nearest school and is therefore not subject to the public notification requirements of Reg 2-1-412.

BACT, PSD, NSPS, and NESHAPS are not triggered in this project.

CONDITIONS

COND# 603

For S-173 Kiln Coke System and S-174 Precalciner Coke System

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company, 24001
Stevens Creek Boulevard Cupertino, CA 95014

1. *The pneumatic system from trucks to storage shall not be operated unless it is vented to a dust collection system. The S-173 Kiln Coke System shall be abated by A-175 Dust Collector and the S-174 Precalciner Coke System shall be abated by the A-174 Dust Collector. (Basis: Regulation 2-2-212 Cumulative Increase)*
2. *The owner/operator of S-173 and S-174 shall not use more than a total of eight (8) twenty (20) tons per hour of petroleum coke combined in the Pre-calciner and Kiln. (Basis: Regulation 2-2-212 Cumulative Increase).*
3. *The emissions of lead while coke is used shall not exceed 3.2 lbs/day. (Basis: Regulation 2-2-306 Non-Criteria Pollutant Analysis, PSD)*
4. *The emissions of beryllium while coke is used shall not exceed 0.04 lbs/day. (Basis: Regulation 2-2-306 Non-Criteria Pollutant Analysis, PSD)*
5. *The emission of hexavalent chromium while coke is used shall not exceed 0.0000284 (2.84E-5) lbs/hr. (Basis: Non-Criteria Pollutant Analysis, Toxics)*
65. *Each shipment of coke shall be sampled for sulfur and trace metal content. The results of this composite analysis shall be submitted to the District once each quarter. (Basis: Regulation 2-1-403).*
7. *For the first 6 months from issuance of Application #15398, the chromium content shall be sampled each month to verify the range of hexavalent chromium and chromium content in the petroleum coke. (Basis: Toxics)*
8. *The owner/operator shall test for the hexavalent chromium and total chromium emission as part of its NESHAPS compliance program (Basis: Toxics)*

RECOMMENDATION

Issue a Change in Permit Condition for the following equipment:

S-173 Kiln Coke System abated by A-175 Dust Collector

S-174 Precalciner Coke System abated by A-174 Dust Collector

HPC will submit a separate application to modify its Title V permit to reflect this condition change.

By: _____
Eric Y. W. Chan
Air Quality Engineer II

____5-11/07_____
Date

EVALUATION REPORT
Lehigh Southwest Cement Company
Application #18535- Plant #17

24001 Stevens Creek Blvd.
Cupertino, CA 95014

I. BACKGROUND

Lehigh Southwest Cement Company has applied for a change in permit condition for the following equipment:

S-154 Pre-Calcliner Kiln abated by A-141 and A-142 baghouses

S-171 Kiln Mill System abated by A-171, Baghouse, Pulse Jet Dust Collector 5-DC-5

S-172 Pre-Calcliner Mill abated by A-172, Baghouse, Pulse Jet Dust Collector 5-DC-6

Lehigh is applying to modify Condition # 603, Part 5 that understated the hexavalent chromium emissions by limiting it to 2.84 E-5 lb/hr under Application # 15398. The application allowed a coke usage increase from 8 ton/hr to 20 ton/hr. Based on the District's toxic risk screen results, 2.84 E-5 lb/hr of hexavalent chromium was the incremental increase of 1 in a million cancer risk, not the total hexavalent chromium emissions.

Lehigh currently has data from two (2) source tests on toxic metals. The first one was performed by Delta Air Quality Services to establish the baseline emissions for toxic metals on April 4, 2001. Lehigh used 0.6 ton/hr of coke and 24.7 ton/hr of coal as fuel during the first test. After increasing the coke usage in May 2007, the Avogadro Group performed the second source test for metals in December 10, 2007 for Lehigh at the maximum 21.5 ton/hr of coke and no coal as fuel.

In the 2001 source test, Delta Air Quality Services originally miscalculated the average of the hexavalent chromium emissions. The corrected values should be 5.22 E-5 lb/hr when the mill is on and 3.99E-5 lb/hr when the mill is off as reported on the attached letter dated April 3, 2008. Assuming the raw mill is on 70% and the raw mill is off 30% of the time, the corrected hexavalent chromium baseline (before switching to coke as the total fuel) emission should be 4.85E-5 lb/hr.

At this time, the District is re-running the toxic risk screen analysis to correct the hexavalent chromium emission limit. Permit Condition 603 will limit the hexavalent chromium emission to a threshold level, so the project cancer incremental risk will be less than 1.0 in a million and the chronic hazard index is less than 0.20 to qualify for CEQA's categorical exemption of Regulation 2-1-312.11.4. Table I below shows an example of total emissions of hexavalent chromium at 1.0 in a million cancer risk.

Table I

Toxic Air Contaminants	2001 Baseline Emissions lbs/hr (lbs/yr)	Allowable Emission Increases (lbs/yr)	Total Emissions lbs/hr (lbs/yr)	Determinant Risk Value
Hexavalent Chromium	5.22E-5 (0.457)	0.602 @ 1 in a million	1.21E-4 (1.059)	1.0 in a million cancer

Permit Condition 603 will limit the hexavalent chromium emission to 2.90E-3 lbs/day (1.21E-4 lbs/hr x 24 hrs/day) so the project cancer incremental risk will be less than or equal to 1.0 in a million. See attached toxic risk screening analysis results dated November 20, 2008.

The District is currently evaluating the benzene emission at S-154, which is one of the main driving components for chronic cancer risk. Benzene emission is associated with raw feed materials' compositions. Although the benzene emission is not expected to increase due to coal to coke fuel switching in this application, the District required Lehigh to perform the benzene

analysis on a monthly basis for one year to establish the long-term emissions for AB-2588. Condition #603, Part 9 was added to impose the benzene source test requirement until AB-2588 is satisfied.

The District will also compare the 2007 emissions with the 2001 baseline emissions to make sure the non-criteria pollutants did not trigger the PSD analysis as required in Regulation 2-2-306. Table II below lists the non-criteria pollutants and compares the emission increase versus the trigger level for PSD analysis. The N/A (not applicable) indicates that the pollutant is not present at the source.

(i) *Table II*

Pollutant	Baseline 2001 Emissions lbs/day	2007 Emissions lbs/day	Increment 2007-2001 Emissions lbs/day	Trigger Incremental levels ton/yr (lbs/day)
Lead	8.68E-3	3.08E-3	no increase	0.6 (3.2)
Asbestos	N/A	N/A	N/A	0.007 (0.04)
Beryllium	5.84E-4	1.43E-3	0.000753	0.0004 (0.002)
Mercury	4.08	0.76	no increase	0.1 (0.5)
Fluorides	N/A	N/A	N/A	3 (16)
Sulfuric Acid Mist	N/A	N/A	N/A	7 (38)
Hydrogen Sulfide	N/A	N/A	N/A	10 (55)
Total Reduced Sulfur	N/A	N/A	N/A	10 (55)
Reduced Sulfur	N/A	N/A	N/A	10 (55)

The District will remove the current permit Condition 603, Parts 3 and 4 that limited lead and beryllium emissions to not exceed 3.2 lbs/day and 0.04 lbs/day, respectively. Again, these were incremental levels that trigger PSD analysis and were inappropriately imposed as total emissions. The District has determined that the project to increase the fuel coke usage from 8 tons/hr to 20 tons/hr did not trigger the non-criteria pollutant PSD analysis per Regulation 2-2-306 as shown on Table II above.

The District will also remove the current permit Condition 603, Part 6 that required a quarterly composition analysis of coke because the new Part 8 replaces Part 6. Condition 603, Part 8 requires an annual source test and reports of metals (Sb, As, Be, Cd, Cr⁺⁶, total Cr, Cu, Hg, Mn, Ni, P, Pb, Se, V, Zn), benzene, Hydrochloric Acid (HCL) and total hydrocarbon (THC) at least once per calendar year at the kiln's exhaust. This is a more practical and enforceable approach than the quarterly analysis of coke's composition.

The District also proposed that Lehigh install volumetric flow meters on 4 of the 32 pyro-processing exhaust dust collectors and on both of the fuel grinding mills exhaust ducts. The airflow rates are needed to calculate NO_x and SO₂ emissions from existing CEM data. Lehigh agreed to the proposal and will submit protocols for installation of these volumetric flow meters upon approval of the District's Source Test Section. Lehigh will install the flow meters within 180 days of the permit issuance or protocol approval.

In addition, the District will clarify the coal and coke burning rates so there will be a limit to how much each of the fuels Lehigh can use. Since Lehigh was limited to 1.6 million tons of clinker production (Condition 2786, Part D), the District did not think the coal fuel rate limit was necessary in the past because the higher heating value of coal (12,500 BTU/lb) and coke (14,500 BTU/lb) are known. Lehigh would like to switch to 100% of coke as fuel, but still requests to have the option of using coal if there is a supply problem with petroleum coke. The daily fuel

input for coke (20 tons/hr) is already limited by permit Condition # 603, Part 2 under Application # 15398. The daily fuel input for coal is limited by the maximum daily production capacity of the facility. The annual fuel input is limited to 1.6 millions tons of clinker production. Calculations of fuel throughputs are shown under Emission Calculations below.

Lehigh has withdrew its request to increase coke usage from 20 ton/hr to 27 ton/hr. Lehigh submitted a written request on October 20, 2008 via email to cancel Application # 16848. The condition change of this application will be incorporated into Lehigh's TV permit renewal under Application # 17947.

II. EMISSION CALCULATIONS

The criteria pollutant emissions should not increase since this application involves only administrative changes. Lehigh will not increase its current throughput of 1.6 MM tons/yr of clinker. Permit condition #2786 also limits the SO₂ emission from the pre-calcliner kiln (S-154) to 481 lb/hr, and condition #11780 limits the NO_x emission from S-154 to 1,158 lb/hr. Lehigh continues to monitor these emissions with existing continuous emission monitors.

Basis:

Clinker rate = 1,600,000 short ton per year

Clinker heat content = 3.1 MMBtu/ton (Specified on the letter dated October 31, 2008 from Lehigh to EPA regarding PSD applicability analysis)

Heat required = 1,600,000 tons/yr x 3.1 MMBtu/ton = 4,960,000 MMBtu/yr

Coke heat content = 29 MMBtu/ton (Specified on the letter dated October 31, 2008 from Lehigh to EPA regarding PSD applicability analysis)

Coal heat content = 25 MMBtu/ton (Specified on the letter dated October 31, 2008 from Lehigh to EPA regarding PSD applicability analysis)

Estimated annual Coke throughput = 4,960,000 MMBtu/yr / 29 MMBtu/ton = 171,034 ton/yr

Estimated annual Coal throughput = 4,960,000 MMBtu/yr / 25 MMBtu/ton = 198,400 ton/yr

Maximum daily coke allowed = 20 tons/hr x 24 hrs/day = 480 tons/day
(existing Condition 603, Part 2)

Maximum daily coal allowed = 29 tons/hr x 24 hrs/day = 696 tons/day
(Maximum = 29 tons/hr coal, will be imposed in Condition 603, Part 2)

III. PLANT CUMULATIVE INCREASE SINCE 4/5/91

The Databank shows the following cumulative increase for this plant.

	<u>Current</u> Ton/yr	<u>New</u> Ton/yr	<u>New Total</u> Lbs/yr	<u>New Total</u> Tons/yr
POC =	0.00	0.00	0.00	0.00
NO _x =	0.00	0.00	0.00	0.00
SO ₂ =	0.00	0.00	0.00	0.00
CO =	0.00	0.00	0.00	0.00
NPOC =	0.00	0.00	0.00	0.00
PM ₁₀ =	0.00	0.00	0.00	0.00

IV. TOXIC SCREENING ANALYSIS

A Toxic Risk Screening Analysis is required with this application since the District is re-evaluating the toxic limits for hexavalent chromium, benzene, and mercury. Detailed findings are

discussed in the background section above. See the attached toxic memorandum dated November 20, 2008.

V. STATEMENT OF COMPLIANCE

Because S-171 (Kiln Coal Mill System) is abated by A-171 Dust Collector, S-172 (Precalciner Coal Mill) is abated by A-172 Dust Collector, and S-154 (Precalciner Kiln) is abated by Dust Collectors A-141 and A-142 and by Baghouses A-171 and A-172, they are expected to comply with the requirements of Regulations 6-301 (Ringelmann No. 1 limitation) and 6-302 (Opacity).

Sources S-171, S-172 are expected to continue to comply with NSPS Subpart Y, Standard Performance for Coal Preparation Plants. S-154 is expected to continue to comply with NESHAP Subpart LLL, National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry.

Best Available Control Technology (BACT) of Regulation 2-2 does not apply to these changes. There is no emission increase for the criteria pollutants.

Lehigh does not have to provide any emission offsets since this project does not have any emission increases per Regulation 2-2-302.

This project is considered to be exempt from CEQA (California Environmental Quality Act) review. It is not subject to CEQA since it is not a new or modified source requiring an Authority to Construct pursuant to Regulation 2-1-310. Also, it satisfies the "no net emission increase" provisions of District Regulation 2, Rule 2. The applicant has submitted a CEQA Environmental Information Form H for the project, and has not identified any potential significant impacts.

This project is over 1,000 ft from the nearest public school and is therefore not subject to the public notification requirements of Regulation 2-1-412.

BACT, PSD are not triggered.

VI. CONDITIONS

Condition # 603

S-154 Calciner Kiln

S-171 Kiln Fuel Mill System

S-172 Precalciner Fuel Mill System

Amended by A/N 15398 and A/N 18535

Any condition that is preceded by an asterisk is not federally enforceable.

1. The **Owner/Operator shall not operate the** pneumatic system from trucks to storage ~~shall not be operated~~ unless it is vented to a dust collection system. **The S-171 Kiln Mill System shall be abated by A-171 Dust Collector, and the S-172 Precalciner Mill shall be abated by the A-172 Dust Collector.** (Basis: Regulation 2-2-212 Cumulative Increase)

2. The owner/operator of **S-171 and S-172,** shall not ~~exceed the following usage limits use more than a total of twenty (20) tons per hour of petroleum coke combined~~ in the Precalciner and Kiln (S-154):-
~~Operation with 100 % coal at maximum 29 tons/hr; or~~

Operation with 100% Petroleum Coke at maximum 20 tons/hr

The Owner/Operator may use any combination of coal and petroleum coke other than specified above, provided that the owner/operator can demonstrate that the total fuel consumption does not exceed 4,960,000 MMBTU/yr (1,600,000 tons/yr clinker x 3.1 MMBtu/ton).

For calculation purposes, the coal's heat content is assumed to be 25 MMBTU/ton and coke's heat content is assumed to be 29 MMBTU/ton. The values may change depending on each shipment received.

(Basis: ~~Regulation 2-2-212~~ Cumulative Increase).

3. The emissions of lead while coke is used shall not exceed 3.2 lbs/day. (Basis: Regulation 2-2-306 Non-Criteria Pollutant Analysis, PSD) Deleted, (inappropriate PSD analysis trigger level for lead per Regulation 2-2-306)
4. The emissions of beryllium while coke is used shall not exceed 0.04 lbs/day. (Basis: Regulation 2-2-306 Non-Criteria Pollutant Analysis, PSD) Deleted, (inappropriate PSD analysis trigger level for beryllium per Regulation 2-2-306)
- *5. The Owner/Operator of S-154 ~~emission of hexavalent chromium while coke is used~~ shall not exceed ~~0.0000284 (2.84E-5)~~ 2.90 E-31.06 pounds of hexavalent chromium per any consecutive 12-month lbs/day hr. (Basis: ~~Non-Criteria Pollutant Analysis, Toxics~~)
6. ~~Deleted, (Part 8 replaces quarterly composition analysis of coke)~~
~~Each shipment of coke shall be sampled for sulfur and trace metal content. The results of this composite analysis shall be submitted to the District once each quarter. (Basis: Regulation 2-1-403).~~
7. ~~For the first 6 months from issuance of Application #15398~~ The Owner/Operator of S-171 and S-172 shall calibrate, maintain, and operate District-approved continuous volumetric flow meters on 4 of the 32 kiln (S-154) exhaust dust collectors (A-141, A-142) and on the fuel grinding mills exhaust dust collectors (A-171 and A-172) as suggested by the manufacturer's recommendation. [Basis: Regulation 2-6-503]
~~, the chromium content shall be sampled each month to verify the range of hexavalent chromium and chromium content in the petroleum coke. (Basis: Toxics)~~
- *8. The Owner/Operator of S-154 shall conduct a source test at least once per calendar year to demonstrate subsequent compliance with Part 5. The test should be conducted with the raw mill on and the raw mill off. The Owner/Operator shall also test for trace metals contents (Sb, As, Be, Cd, total Cr, Cr⁶⁺, Cu, Hg, Mn, Ni, P, Pb, Se, V, Zn), benzene, Hydrochloric Acid (HCL) and total hydrocarbon (THC) at least once per calendar year. The Owner/Operator shall submit the source test results to the District Source Test Section and Engineering Divisions no later than 60 days after the source test. [Basis: Periodic Monitoring, Regulation 1-502] ~~The owner/operator shall test for the hexavalent chromium and total chromium emission as part of its NESHAPS compliance program (Basis: Toxics)~~
9. The Owner/Operator shall obtain approval for all source test procedures from the District's Source Test Manager prior to conducting any tests. The Owner/Operator shall comply with all applicable testing requirements for continuous emissions monitors as approved by the District's Source Test Manager. The Owner/Operator shall notify the District's Source Test Manager, in writing, of the source test protocols and projected test dates at least 7 days prior to testing. [Basis: Source test compliance verification and accuracy]

10. The owner/operator shall maintain daily records (calendar day), in a District approved log, for: (1) the amount of coke and coal usage, each separately (2) the coke's heat content and the coal's heat content. The daily throughput of fuel used and daily average volumetric flow rates shall be submitted to the District once each quarter. All records shall be retained for a period of at least five years from the date of entry. This log shall be kept on site and made available to District staff upon request. [Basis: Recordkeeping]

COND# 11780

For Source 154 Cement Kiln, Plant 17

The following federally enforceable conditions limit the emissions of nitrogen oxides (NOx) from the cement manufacturing facility operated by the owner/operator, Hanson Permanente Lehigh Southwest Cement Corporation Company (previously Kaiser-Hanson Permanente Cement, Inc. Corporation) located at 24001 Stevens Creek Boulevard, Cupertino, Cal. 95014, for the purpose of complying with Section 182(f) of the Federal Clean Air Act. These conditions represent reasonably available control technology for this activity.

A) Definitions: (Basis: CAA Section 182(f) – RACT)

1. Breakdowns shall be handled according to provisions established in BAAQMD, Regulation 1, Section 112 and Section 431 through 434. (Basis: RACT)
2. Cement Kiln is a device for the calcining and clinkering of limestone, clay and other raw materials in the manufacture of cement. (Basis: Applicability)
3. Clinker is a mass of fused material produced in a cement kiln from which the finished cement is manufactured by milling and grinding. (Basis: Applicability)
4. Start-up is that period of time during which a cement kiln is heated to operating temperature from a lower temperature not to exceed 36 hours. (Basis: RACT)
5. Short ton is equivalent to 2000 pounds. (Basis: Compliance Verification Component)
6. Shut-down is that period of time during which a cement kiln is allowed to cool from operating temperature to a lower temperature not to exceed 36 hours. (Basis: RACT)

B) Production Limits: (Basis: Regulation 2-2-212)

1. The owner/operator shall not process more than 1.6 million short tons per year of clinker. (Basis: Regulation 2-2-212 Cumulative Increase)

C) Emission Limits: (Basis: Regulation 2-2-212)

1. The maximum allowable emission rate for nitrogen-Nitrogen oxides-Oxides from all kiln emission points shall not exceed both (i) 1158 lb/hr and (ii) a maximum concentration of 615 ppm (dry basis) without correction for oxygen, both measured as an average over a 2 hour period. (Basis: RACT)

2. The kiln emission points effected include the stacks venting the kiln-mill system (dust collector 4-DC-7 through 4-DC-38), the kiln coal mill exhaust (dust collector 5-DC-5) and the precalciner coal mill exhaust (dust collector 5-DC-6). Basis: RACT)
3. The emission of ~~nitrogen~~ Nitrogen oxides ~~Oxides~~ into the atmosphere shall not exceed 6.4 lb/ton of clinker as determined on a 24-hour basis and averaged over any 30 consecutive days of operation. (Basis: RACT)

D) Compliance Determination: (Basis: RACT)

1. All emission determinations shall be made in the as-found operating condition, except no compliance determination shall be established during or using periods of start-up, shut-down, or under breakdown conditions. (Basis: RACT)
2. For the purposes of mass emission limits, ~~N~~nitrogen ~~O~~oxides (NOx) shall be calculated as NO₂ on a dry basis. (Basis: RACT)
3. The following expression shall be used to convert uncorrected observed volume in parts per million of NO_x to pounds of NO_x per hour produced at standard conditions of 70 degrees F. and 29.92 inches of mercury: (Basis: RACT)

$$[(\text{PPMvNO}_x)(46\text{lb/lb mole})(263000 \text{ scfm})(60 \text{ min/hr})] / [386 \text{ cf/lb mole} * 1\text{E}6] = \text{lbs NO}_x/\text{hr}$$

Exhaust flow rate was modified to 263,000 scfm on 9/17/97.

~~This part will be deleted after the flow meters are installed and data are reviewed. The assumed air flow rate is no longer applicable since the actual air flow rate will be measured by the flow meters.~~

E) Monitoring and Records: (Basis: RACT)

1. The owner/operator shall maintain in good working order and operate an in-stack continuous emission monitoring system (CEMS) to demonstrate compliance with the emission limit in ~~part~~ Part C.1.~~ii~~ by measuring the emission of nitrogen oxides (NO_x). The in-stack continuous emission monitoring system shall be located on an emission point of one of the Kiln-Mill baghouses and shall continuously monitor and record NO_x emissions in a manner approved by the APCO and the EPA Administrator whenever the kiln is operating as defined in Part (d)(1) above. (Basis: Cumulative Increase)
2. The owner/operator shall maintain daily records of clinker production and heat input including the type of fuel burned and the quantity of fuel burned expressed as millions of BTU per ton of clinker. The amount of clinker produced shall be totaled so that the limit in Part B is not exceeded. (Basis: RACT)
3. The owner/operator shall maintain hourly continuous emission monitoring records for the monitoring system in a form suitable for inspection and approved by the APCO and the EPA administrator. Such records shall include, but are not limited to: (Basis: RACT)
 - (i) The continuous emission monitoring measurements for NO_x expressed in ppm;
 - (ii) The date, time, and duration of any start-up, shutdown or malfunction in the operation of any of the kiln systems or the emission monitoring equipment; and,
 - (iii) The results of performance testing, evaluation, calibration, checks, adjustments, and maintenance of the continuous emission monitoring system.

4. The CEMS records as well as records of clinker production and heat input shall be maintained at the facility for five years and shall be available to the APCO or the EPA Administrator upon request. (Basis: Cumulative Increase)

F) Manual of Procedures

1. Determination of Nitrogen Oxides: The methods by which samples of exhaust gases are collected and analyzed to determine concentrations of nitrogen oxides are set forth in the District Manual of Procedures, Volume IV, ST-13A or 13B. EPA Method 7E may also be used to determine compliance. A source shall be considered in violation if the emissions measured by any of the referenced test methods exceed the standards of this rule. (Basis: Manual of Procedures, Volume IV)
2. The CEMS must meet the requirements of District Manual of Procedures, Volume V, Continuous Emission Monitoring, Policy and Procedures. (Basis: Regulation 1-522, 1-602; Manual of Procedures, Volume V)

VII. RECOMMENDATION

Issue a change in Permit Condition for the following equipment:

S-154 Calciner Kiln

S-171 Kiln Mill System abated by A-171, Baghouse, Pulse Jet Dust Collector 5-DC-5

S-172 Pre-Calciner Mill abated by A-172, Baghouse, Pulse Jet Dust Collector 5-DC-6

Thu H. Bui
Senior Air Quality Engineer
Engineering Division

Date: _____

THB:disk-h\Lehigh\16849e\

EVALUATION REPORT
Lehigh Southwest Cement Company
Application #19385- Plant #17

24001 Stevens Creek Blvd.
Cupertino, CA 95014

I. BACKGROUND

Lehigh Southwest Cement Company has applied for an Authority to Construct/Permit to Operate for the following equipment:

S-606 Storage Piles Area #1 (coal, coke, bauxite, iron ore), abated by Water Spray A-606

S-607 Storage Piles Area # 2 (aggregates, slag), abated by Water Spray A-607

Lehigh submitted this application as a result of failing to maintain a minimum 5% moisture content at the storage piles. On November 20, 2008, Lehigh received the Violation Notice # A50005 for two storage piles areas mentioned above.

S-606 the storage piles area #1 (coal, bauxite and iron ore storage piles), located next to the rail unloading section, have been used at Lehigh ever since 1981 when the plant modernized its operation. Lehigh replaced some of the coal with coke materials in the same area after Lehigh received a permit to use up to 8 ton/hr of coke as fuel in 1986. Lehigh has always considered the storage piles as part of its Rail Unloading System Area, S-111, and did not identify it as a separate source for its Title V permit. According to District's Regulation 2-1-115.1.4, these storage piles would be exempt if the storage material is more than or equal to 5% moisture content, by weight.

On October 16, 2008, the District inspector collected five samples from four different storage piles (coal, coke, bauxite, iron ore) at S-606. Four out of five samples showed that the moisture contents are less than 5% by weight. Therefore, S-606 required a permit since Lehigh cannot maintain the stockpile at a minimum of 5% moisture content.

S-607 the stockpile area # 2 (1", ¼" aggregates and slag) at the entrance's gate is new. These storage piles are exempt if the material has a moisture content more than or equal to 5% by weight. On October 16, 2008, the District inspector collected three samples from three different storage piles (aggregates and slag storage piles). All samples showed that the moisture contents are less than 5% by weight. Therefore, S-607 required a permit since Lehigh cannot maintain the stockpile at a minimum of 5% moisture content.

In the past, Lehigh sprayed the storage piles with water daily using the drive around water trucks. Lehigh has moved the outside materials inside the storage structure as much as possible. However, to maintain operations against inventory and market fluctuations, Lehigh stores two months worth of fuels at the plant. Lehigh has been testing every shipment of petroleum coke that comes into the plant. The moisture results are all higher than 5% by weight. However, over time, the storage piles located outside became drier. Lehigh did not want to over-water the fuel material storage piles for fear that the run off water might flow into the Permanente Creek, and the wet fuels and raw materials may result in use of more energy.

The Authority to Construct/Permit to Operate of this application will be incorporated into Lehigh's TV permit renewal under Application # 17947.

II. EMISSION CALCULATIONS

Table I – Summary of Throughput and Area of Stockpiles

Sources	Materials	Annual Throughput (short tons)	Daily Throughput (short tons)	Acres
S-606	Coal	198,400	696	0.2
	Coke	171,034	480	0.5
	Bauxite	60,000	380	0.3
	Iron Ore	50,000	275	0.2
S-607	1" Aggregate	20,000	3,500	0.3
	¼" Aggregate	200,000	1,000	2
	GBF Slag	20,000	1,440	0.4

S-606 Storage piles Area # 1

S-606 Emission from drop operation into storage piles

- Equation for uncontrolled PM10 emissions for Aggregate Handling and Storage Piles used is in AP-42, Section 13.2.4 (dated 1/95)
- Loading of aggregate onto the storage piles and loadout of aggregate for return to the process stream (2 transfer points)

Coal, Coke Bauxite and Iron Ore piles:

$E = k(0.0032) [U/5]^{1.3} / [M/2]^{1.4} = 0.35 \times 0.0032 [0.41/5]^{1.3} / [0.7/2]^{1.4} = 0.000188 \text{ lb/ton per transfer point}$

E = particulate emissions 10 microns size

k = particle size multiplier = 0.35

U = mean wind speed = 0.41 mile/hr (Meteorological Assimilation Data Ingest System (MADIS) provided by Lehigh)

M = moisture content = 0.7% (assumed all material have moisture content of crushed **limestone** (AP-42, Table 13.2.4-1))

Maximum Annual throughput = 479,434 ton/yr x 0.000188 lb/ton x 2 transfer points = 180.3 lb/yr
Maximum Daily throughput = 1,831 ton/day x 0.000188 lb/ton x 2 transfer points x = 0.69 lb PM₁₀/highest day

S-606 Emission from wind erosion of storage piles

- Emission factors for wind erosion for storage piles at crushing and grinding plants may be taken from AP-42, Fourth Edition, Section 8.19, Table 8.19.1-1. These emission factors include emissions from wind erosion. Assuming the 3.5 lb/acre/day emission is for TSP emissions, the wind blown PM10 emissions would be approximately 50% or:
- PM10 emissions = 1.7 lb/acre/day – BAAQMD Handbook Chapter 11.7
- Water Spray = 70% control efficiency
- S-606 occupies 1.2 acre

Wind Erosion (Coal, Coke Bauxite and Iron Ore Piles)

Annual Emissions = 1.7 lb/acre/day x 1.2 acre x 365 day/yr x (1-0.7) = 223.4 lb/yr PM₁₀

Daily Emissions = 1.7 lb/acre/day x 1.2 acre x (1-0.7) = 0.61 lb/day PM₁₀

S-607 Storage piles Area # 2

S-607 Emission from drop operation into storage piles

- Equation for uncontrolled PM10 emissions for Aggregate Handling and Storage Piles used is in AP-42, Section 13.2.4 (dated 1/95)
- Loading of aggregate onto the storage piles and loadout of aggregate for return to the process stream (2 transfer points)
- The two aggregate limestone piles (1" and ¼") both have a 0.0% silt percentage (< 200 mesh). However, since AP-42's batch drop equation does not include the silt content, the District will assume a higher moisture content of 7% as a correction parameter in estimating the aggregate emissions.
- The Granulated Blast Furnace (GBF) Slag has a silt content of 2.0%

Slag pile:

$E = k(0.0032) [U/5]^{1.3} / [M/2]^{1.4} = 0.35 \times 0.0032 [0.41/5]^{1.3} / [0.7/2]^{1.4} = 0.000188 \text{ lb/ton per transfer point}$

E = particulate emissions 10 microns size

k = particle size multiplier = 0.35

U = mean wind speed = 0.41 mile/hr (Meteorological Assimilation Data Ingest System (MADIS) provided by Lehigh)

M = moisture content = 0.7% (assumed all material have moisture content of crushed limestone (AP-42, Table 13.2.4-1))

Maximum Annual throughput = 20,000 ton/yr x 0.000188 lb/ton x 2 transfer points = 2.26 lb/yr

Maximum Daily throughput = 1,440 ton/day x 0.000188 lb/ton x 2 transfer points x = 0.16 lb PM₁₀/highest day

Aggregate piles:

$E = k(0.0032) [U/5]^{1.3} / [M/2]^{1.4} = 0.35 \times 0.0032 [0.41/5]^{1.3} / [7/2]^{1.4} = 7.5\text{E-}6 \text{ lb/ton per transfer point}$

E = particulate emissions 10 microns size

k = particle size multiplier = 0.35

U = mean wind speed = 0.41 mile/hr (Meteorological Assimilation Data Ingest System (MADIS) provided by Lehigh)

M = moisture content = 7% (assumed higher moisture content to correct for 0% silt content.)

Maximum Annual throughput = 220,000 ton/yr x 7.5E-6 lb/ton x 2 transfer points = 3.3 lb/yr

Maximum Daily throughput = 4,500 ton/day x 7.5E-6 lb/ton x 2 transfer points x = 0.068 lb PM₁₀/highest day

S-607 Emission from wind erosion of storage piles

- Emission factors for wind erosion for storage piles at crushing and grinding plants may be taken from AP-42, Fourth Edition, Section 8.19, Table 8.19.1-1. These emission factors include emissions from wind erosion. Assuming the 3.5 lb/acre/day emission is for TSP emissions, the wind blown PM10 emissions would be approximately 50% or:
 - PM10 emissions = 1.7 lb/acre/day – BAAQMD Handbook Chapter 11.7
 - Water Spray = 70% control efficiency
 - S-607 occupies 2.7 acre

Wind Erosion (Slag and Aggregate Piles)

Annual Emissions = 1.7 lb/acre/day x 2.7 acre x 365 day/yr x (1-0.7) = 502.6 lb/yr PM₁₀

Daily Emissions = 1.7 lb/acre/day x 2.7 acre x (1-0.7) = 1.38 lb/day PM₁₀

Total Annual Emissions = 180.3 + 223.4 + 2.26 + 3.3 + 502.6 lbs/yr = 911.9 lbs/yr

Total Daily Emissions = 0.69 + 0.61 + 0.16 + 0.068 + 1.38 lbs/day = 2.9 lbs/day

For emissions from equipment traffic (trucks, front-end loaders, etc.) traveling on paved road between piles, it is recommended that the emissions not be included as part of S-606 and S-607 because emissions are small and already included in the plant's activities. The aggregates and slag piles have very little throughput and activity. The slag is placed there for storage for small slag-cement order and when the aggregate cannot be sold because of poor market conditions.

III. PLANT CUMULATIVE INCREASE SINCE 4/5/91

The Databank shows the following cumulative increase for this plant.

	<u>Current</u> <u>Ton/yr</u>	<u>New</u> <u>Ton/yr</u>	<u>New Total</u>	
			<u>Lbs/yr</u>	<u>Tons/yr</u>
POC =	0.00	0.00	0.00	0.00
NO _x =	0.00	0.00	0.00	0.00
SO ₂ =	0.00	0.00	0.00	0.00
CO =	0.00	0.00	0.00	0.00
NPOC =	0.00	0.00	0.00	0.00
PM ₁₀ =	0.012	0.456	936	0.468

IV. TOXIC SCREENING ANALYSIS

A Toxic Risk Screening Analysis is not required with this application since emissions of toxic compounds are below the health risk screening analysis trigger levels in Regulation 2-5, Table 1.

For source S-606, Storage Piles Area #1, the new source review of toxic air contaminants Regulation 2-5 does not apply since the source was constructed prior to January 1, 1987, before the District Rules and Regulations and Risk Management Policy in effect per Regulation 2-5-112.

For source S-607, the following toxic compositions were based on the Comprehensive Emission Inventory Report (CEIR) prepared by AMEC Geomatrix on March 27, 2009 and submitted by Lehigh on the slag pile. The District does not anticipate any toxic emissions from the aggregate piles because of their specific sizing requirements. The District will not perform the toxic analysis at this time for crystalline silica since there is no trigger level and emissions are low, but the whole area source will be included in the analysis for the AB2588 update.

PM10 emissions =	0.067	lb/hr	508	lb/yr	
	Concentration of Compound in Slag	Emission of Compound from Slag	Acute Trigger level	Emission of Compound from Slag	Chronic Trigger Level
Compound	mg/Kg	lb/hr	lb/hr	lb/yr	lb/yr
Antimony	2.5	N/A	N/A	1.27E-03	7.70E+00
Arsenic	1.3	8.72E-08	4.20E-04	6.60E-04	1.20E-02
Beryllium	4.7	N/A	N/A	2.39E-03	8.00E-02
Cadium	1.3	N/A	N/A	6.60E-04	4.50E-02
Copper	2.5	1.68E-07	2.20E-01	1.27E-03	9.30E+01
Lead	1.25	N/A	N/A	6.35E-04	5.40E+00

Mercury	1.1	7.38E-08	4.00E-03	5.59E-04	5.60E-01
Molybdenum	2.5	N/A	N/A	N/A	N/A
Nickel	3	2.01E-07	1.30E-02	1.52E-03	7.30E-01
Selenium	2.5	N/A	N/A	1.27E-03	7.70E+02
Vanadium	18	1.21E-06	6.60E-02	N/A	N/A
Zinc	25	N/A	N/A	1.27E-02	1.40E+03
Hex Chromium	0.1	N/A	N/A	5.08E-05	1.30E-03
Crystalline Silica	10.2	6.84E-7	N/A	5.18E-3	N/A

V. BEST AVAILABLE CONTROL TECHNOLOGY

Sources S-606 and S-607 did not trigger BACT because the PM10 emissions are below 10 pounds per highest day for each source per Regulation 2-2-301.

VI. OFFSETS

Offsets are required since the facility's PM10 emissions are more than 100 ton/yr per Regulation 2-2-303. At this time, Lehigh will also provide offsets for Application 15217, which was deferred because the PM10 emission increase was less than 1 ton/yr.

		Ton/yr
		PM10
A/N 19385	S-606, S-607 Stock Piles	0.456
A/N 15217	S-444 Emergency Clinker Conveyor	0.012
Total		0.468

The company used the Certificate of Deposit # 1125 to provide offsets with the ratio of 1:1 for PM10 per Regulation 2-2-303. The original certificate has 1.898 ton of PM10. Thus, the Banking Certificate # 1125 will be reissued to Lehigh in the amount of 1.430_tons PM10/yr.

VII. STATEMENT OF COMPLIANCE

S-606 and S-607 are subject to and expected to comply with the requirements of Regulations 6-1-301 (Ringelmann No. 1 limitation), 6-1-302 (Opacity), and 6-1-311 (General Operations)

Sources S-606 is exempt from NSPS Subpart Y, Coal operation with open storage piles.

Source S-606 is considered to be categorical under the District's CEQA Regulation 2-1-312-4 for existing source pursuant to a loss of a previously valid exemption from the District permitting requirements, and therefore is not subject to CEQA review.

Source S-607 of this application is considered to be ministerial under the District's CEQA Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors in accordance with Permit Handbook Chapter 11.7.

New Source Performance Standards (NSPS)

S-607 are expected to continue to comply with NSPS Subpart_OOO for nonmetallic mineral processing, which includes regulations for emissions from operating equipment that was manufactured, modified or reconstructed after August 31, 1983. Processing equipment regulated under Subpart OOO affecting the crushed stone, sand and gravel industry includes crushers, grinding mills, screens, bucket elevators, bagging operations, storage bins, enclosed truck and railcars and transfer points on belt conveyors.

Under Subpart OOO, aggregate facilities are required to conduct performance testing on stationary equipment in accordance with EPA Reference Method 9. Method 9 is a visual emissions test that determines opacity or the percentage of the light that is prevented from passing through a plume or fugitive emission. Individuals performing the opacity readings are required to be trained and certified in accordance with the method. EPA has set specific limits for the aggregates industry based on opacity readings designated to various processing equipment ranging from 7-15 percent (%). Among the requirements of Method 9 is determining the average of twenty-four readings over a six-minute period for a total of one hour for each piece of equipment that falls under the purview of NSPS.

This project is over 1,000 ft from the nearest public school and is therefore not subject to the public notification requirements of Regulation 2-1-412.

PSD is not triggered because the increase of PM10 emission is below 15 tons/yr per Regulation 2-2.304.3. Table I below lists the non-criteria pollutants and compares the emission increase versus the trigger level for PSD analysis. The N/A (not applicable) indicates that the pollutant is not present at the source.

(ii) *Table I*

Pollutant	Emission Increases lbs/day	Trigger Incremental levels lbs/day	Emission Increases tons/yr	Trigger Incremental levels ton/yr
Lead	4.89E-6	3.2	8.93E-7	0.6
Asbestos	N/A	0.04	N/A	0.007
Beryllium	7.80E-6	0.002	1.42E-6	0.0004
Mercury	1.56E-6	0.5	2.84E-7	0.1
Fluorides	N/A	16	N/A	3
Sulfuric Acid Mist	N/A	38	N/A	7
Hydrogen Sulfide	N/A	55	N/A	10
Total Reduced Sulfur	N/A	55	N/A	10
Reduced Sulfur	N/A	55	N/A	10

VI. CONDITIONS

Condition # 24274

For S-606 Storage Piles Area #1, S-607 Storage Piles Area #2.

1. The owner/operator shall not exceed the following throughput limits in any consecutive 12-month period:
S-606 198,400 short tons/yr coal
171,034 short tons/yr coke
60,000 short tons/yr Bauxite
50,000 short tons/yr Iron Ore

S-607 20,000 short tons/yr 1" aggregate
200,000 short tons/yr 1/4" aggregate
20,000 short tons/yr slag
(basis: Cumulative Increase)
2. The owner/operator shall not discharge an air contaminant into the atmosphere for a period or periods aggregating more than 3 minutes in any hour, which is as dark or darker than a Ringelmann 1.0. (basis: Regulation 6-301)
3. The owner/operator shall abate S-606 and S-607 Storage Piles as necessary with A-606 and A-607 Water Sprays, respectively, to maintain compliance with Part 2 of this condition. (basis: Cumulative Increase)
4. The owner/operator shall maintain a District approved log on a monthly basis for material throughput at each source. The owner/operator shall keep this log on site for at least five years from the date of entry and make it available to District staff upon request. (basis: Cumulative Increase)

VII. RECOMMENDATION

Issue a conditional Permit to Operate for the following equipment:

S-606 Storage Piles Area #1

S-607 Storage Piles Area # 2

Thu H. Bui
Senior Air Quality Engineer
Engineering Division
Date: _____

Evaluation Report
A/N 20199
G# 9200 (Plant 17, Source 1)
Lehigh Southwest , 24001 Stevens Creek Blvd., Cupertino

Background

Armour Petroleum on behalf of Lehigh Southwest has applied for an A/C to replace the Phase II vapor recovery on the existing GDF at the Cupertino cement plant with an EVR certified Phase II system. No other work is proposed under this application.

Lehigh Southwest currently operates one 10K tank and 2 single product nozzles with OPW EVR 2-point Phase I and balance Phase II vapor recovery equipment. They also operate a 10K diesel nozzle tank with two nozzles that is exempt from permit and vapor recovery requirements. This project is limited to replacing the hanging hardware with VR-203 certified equivalents and installing the Veeder Root Vapor Polisher and other components of the VST EVR Phase II system without ISD.

Proposed Phase II equipment consists of the VST EVR Phase II system with the Veeder-Root Vapor Polisher pursuant to CARB Executive Order VR-203. ISD controls have not been proposed.

Emissions

No change in permitted throughput has been requested.

As the EVR Phase II equipment is certified to slightly more stringent standards than the existing balance Phase II vapor recovery equipment, there should be no increase in emissions per unit throughput.

The net emission increase under this A/N will be zero.

Statement of Compliance

As there will be no net emissions increase from this project, this application is not subject to the BACT and offset requirements of Regulation 2, Rule 2.

The proposed VST EVR Phase II equipment is certified under VR-203. Plans submitted with this application verify that the installation will satisfy the requirements of this Executive order:

- Each dispenser will each be equipped with VST-EVR-NB nozzles (one per side) and VST hoses.
- The site has a V-R TLS 350 console and will be equipped with the proper software and controls for operation of the VST EVR Phase II system with the V-R Vapor Polisher
- A Vapor Pressure Sensor will be installed in the dispenser nearest the tanks.
- This site is not equipped with vapor pots or condensate traps. This site has not modified their underground piping since April 1, 2003 and thus is not subject the piping size requirements of VR-203
- The outlet of the V-R Vapor Polisher will be 12' above grade, and the vent pipes will be adequately supported

Lehigh Southwest is currently conditions to 400,000 gal/yr under cond #7523. They are thus not subject to ISD requirements.

Use of CARB certified equipment satisfies all requirements of District Regulation 8, Rule 7.

Permit Conditions

Authority to Construct Conditions:

COND# 24297

1. The VST EVR Phase II Vapor Recovery System with the Veeder-Root Vapor Polisher, including all associated underground plumbing, shall be installed, operated, and maintained in accordance with the most recent revision of the California Air Resources Board (CARB) Executive Order (E.O.). VR-203. Section 41954(f) of the California Health and Safety Code prohibits the sale, offering for sale, or installation of any vapor control system unless the system has been certified by the state board.
2. Only CARB-certified EVR Phase I vapor recovery systems shall be used in conjunction with the VST EVR Phase II Vapor Recovery System.
3. The owner/operator of the facility shall maintain records in accordance with the following requirements. Records shall be maintained on site and made available for inspection for
 - a. period of 24 months from the date the record is made. a. Monthly throughput of gasoline pumped, summarized on an annual basis
 - b. A record of all testing and maintenance as required by E.O. VR-203, Exhibit 2. The records shall include the maintenance or test date, repair date to correct test failure, maintenance or test performed, affiliation, telephone number, name and Certified Technician Identification Number of individual conducting maintenance or test.
4. All applicable components shall be maintained to be leak free and vapor tight. Leak Free, as per BAAQMD (District) Regulation 8-7-203, is a liquid leak of no greater than three drops per minute. Vapor Tight is as defined in District Manual of Procedures, Volume IV, ST-30.
5. Start-up notification: applicant must contact the assigned Permit Engineer, listed in the correspondence section of this letter, by phone, by fax [(415) 749-4949], or in writing at least three days before the initial operation of the equipment is to take place. Operation includes any start-up of the source for testing or other purposes. Operation of equipment without notification being submitted to the District, may result in enforcement action. Please do not send start-up notifications to the Air Pollution Control Officer.
6. The following performance tests shall be successfully conducted at least ten (10) days, but no more than thirty (30) days after start-up. For the purpose of compliance with this Condition, all tests shall be conducted after back- filling, paving, and installation of all required Phase I and Phase II components.
 - a. Static Pressure Performance Test using CARB Test Procedure TP-201.3 (3/17/99) in accordance with E.O. VR-203, Ex. 4. If the tank size is 500 gallons or less, the test shall be performed on an empty tank.
 - b. Dynamic Back Pressure Test using CARB Test Procedure TP-201.4 (7/3/02) in accordance with the condition listed in item 1 of the Vapor Collection Section of E.O. VR-203, Exhibit 2. The dynamic back pressure shall not exceed 0.35" WC @ 60 CFH and 0.62" WC @ 80 CFH.
 - c. Liquid Removal Test using E.O. VR-203, Exhibit 5.
 - d. Vapor Pressure Sensor Verification Test using E.O. VR-203, Exhibit 8
 - e. Nozzle Bag Test on all nozzles in accordance with E.O. VR-203, Exhibit 10.
 - f. Veeder-Root Vapor Polisher Operability Test in accordance with E.O. VR-204, Exhibit 11.
 - g. Veeder-Root Vapor Polisher Emissions Test in accordance with E.O. VR-204, Exhibit 12.

7. The VST EVR Phase II system with the Veeder-Root Vapor Polisher shall be capable of demonstrating on-going compliance with the vapor integrity requirements of CARB Executive Order E.O. VR-203. The owner or operator shall conduct and pass the following tests at least once in each consecutive 12-month period following successful completion of start-up testing. Tests shall be conducted and evaluated using the above referenced test methods and standards.
 - a. Static Pressure Performance Test - TP-201.3
 - b. Dynamic Back Pressure Test - TP-201.4
 - c. Liquid Removal Test - E.O. VR-203, Exhibit 5
 - d. Vapor Pressure Sensor Verification Test - E.O. VR-203, Exhibit 8
 - e. Veeder-Root Vapor Polisher Operability Test in accordance with E.O. VR-204, Exhibit 11.
 - f. Veeder-Root Vapor Polisher Emissions Test in accordance with E.O. VR-204, Exhibit 12.
8. The applicant shall notify Source Test by email at gdfnotice@baaqmd.gov or by FAX at (510) 758-3087, at least 48 hours prior to any testing required for permitting. Test results for all performance tests shall be submitted in a District-approved format within thirty days of testing. Start-up tests results submitted to the District must include the application number and the GDF number. (For annual test results submitted to the District, enter "Annual" in lieu of the application number.) Test results may be submitted by email (gdfresults@baaqmd.gov), FAX (510) 758-3087) or mail (BAAQMD Source Test Section, Attention Hiroshi Doi, 939 Ellis Street, San Francisco CA 94109).
9. The maximum length of the coaxial hose assembly, including breakaway, swivels, and whip hoses, shall be fifteen (15) feet.
10. The dispensing rate shall not exceed ten (10.0) gallons per minute (gpm), nor be less than six (6.0) gpm with the trigger at the highest setting. Compliance with this condition shall be verified using the applicable provisions of E.O. VR-203, Ex. 5. Flow limiters may not be used.
11. A Vapor Pressure Sensor shall be installed in the dispenser closest to the underground tanks.
12. The TLS console controlling the Veeder-Root Vapor Polisher shall be equipped with a printer and have an open RS232 port that is accessible to District staff during operating hours.
13. Except when necessary for testing and maintenance, the Veeder-Root Vapor Polisher shall be on and in automatic vapor processor mode with the inlet valve in the open position per E.O. VR-203, Ex. 2. The handle shall not be removed for any reason.
14. The outlet of the Veeder-Root Vapor Polisher shall be at least 12 feet above grade.
15. The station shall maintain OSHA-approved access to the Veeder-Root Vapor Polisher. This access should be provided immediately upon request by District personnel.
16. The VST EVR Phase II Vapor Recovery System shall be maintained and operated in accordance with E.O. VR-203 and the System Operating Manual approved by CARB.
17. Security tags shall be installed and maintained on the Veeder-Root Vapor Polisher. A Veeder-Root Vapor Polisher Operability Test and a Veeder-Root Vapor Polisher Emissions Test shall be performed after the replacement of any damaged or missing tags using the above referenced test methods and subject to the above notification and reporting requirements.
18. The headspace of all underground tanks connected to VST EVR Phase II Vapor Recovery System shall be connected by a manifold below grade at the tanks and/or a manifold between the vent lines.

19. For stations installed or performing a major modification of underground vapor piping after April 1, 2003, all vapor recovery piping shall be a minimum of 2" from the vent stack or dispensers to the first manifold and a minimum of 3" in diameter from the manifold to the underground tanks, with the headspace of all tanks connected by a below-grade manifold. The following piping shall slopedown towards the lowest octane tank with a minimum slope of 1/8" per linear foot:
 - a) Any manifold piping connecting the storage tank headspaces.
 - b) All vapor recovery piping between the dispenser and storage tank.
 - c) Vent piping from the base of the vent pipe to the storage tank(s). A major modification is considered a project that adds to, replaces, or removes more than 50% of the underground vapor piping.
20. Condensate traps or knock-out pots are prohibited.
21. Each storage tank vent pipe shall be equipped with a CARB certified pressure/vacuum relief valve as required by the applicable Phase I E.O.. Vents pipes may be manifolded to reduce the number of relief valves needed. No relief valve shall be installed on the Veeder-Root Vapor Polisher outlet.
22. The Veeder-Root EVR system and TLS console may only be installed and serviced by contractors that have completed the Veeder-Root training program. Installation and start-up shall be in accordance with VR-203 and the Veeder Root installation manual.

COND# 7523

For S-1 Gasoline Dispensing Station

1. Pursuant to BAAQMD Regulation 2-5, the owner/operator shall ensure the facility's annual gasoline throughput does not exceed 400,000 gallons in any consecutive 12-month period. (Basis: Regulation 2-5)

COND# 20666

1. The OPW EVR Phase I Vapor Recovery System, including all associated plumbing and components, shall be operated and maintained in accordance with the most recent version of California Air Resources Board (CARB) Executive Order VR-102. Section 41954(f) of the California Health and Safety Code prohibits the sale, offering for sale, or installation of any vapor control system unless the system has been certified by the state board.
2. The owner or operator shall conduct and pass a Rotatable Adaptor Torque Test (CARB Test Procedure TP201.1B) and either a Drop Tube/Drain Valve Assembly Leak Test (TP201.1C) or, if operating drop tube overfill prevention devices ("flapper valves"), a Drop Tube Overfill Prevention Device and Spill Container Drain Valve Leak Test (TP201.1D) at least once in each 36- month period. Measured leak rates of each component shall not exceed the levels specified in VR-102.

The applicant shall notify Source Test by email at gdfnotice@baaqmd.gov or by FAX at (510) 758-3087, at least 48 hours prior to any testing required for permitting. Test results for all performance tests shall be submitted within fifteen (15) days of testing. Start-up tests results submitted to the District must include the application number and the GDF number. (For annual test results submitted to the District, enter "Annual" in lieu of the application number.) Test results may be submitted by email (gdfresults@baaqmd.gov), FAX (510) 758-3087 or mail (BAAQMD Source Test Section, Attention Hiroshi Doi, 939 Ellis Street, San Francisco CA 94109).

COND# 24298

1. The VST EVR Phase II Vapor Recovery System with the Veeder-Root Vapor Polisher without ISD, including all associated underground plumbing, shall be installed, operated, and maintained in accordance with the most recent revision of the California Air Resources Board (CARB) Executive Order (E.O.). VR-203. Section 41954(f) of the California Health and Safety Code prohibits the sale, offering for sale, or installation of any vapor control system unless the system has been certified by the state board.
2. The owner/operator of the facility shall maintain records in accordance with the following requirements. Records shall be maintained on site and made available for inspection for a period of 24 months from the date the record is made.
 - a. Monthly throughput of gasoline pumped, summarized on an annual.
3. All applicable components shall be maintained to be leak free and vapor tight. Leak Free, as per BAAQMD (District) Regulation 8-7-203, is a liquid leak of no greater than three drops per minute. Vapor Tight, as per District Regulation 8-7-206, is a leak of less than 100 percent of the lower explosive limit on a combustible gas detector measured at a distance of 1 inch from the source or absence of a leak as determined by the District Manual of Procedures, Volume IV, ST-30 or CARB Method TP-201.3.
4. The VST EVR Phase II system with the Veeder-Root Vapor Polisher without ISD shall be capable of demonstrating on- going compliance with the vapor integrity requirements of CARB Executive Order E.O. VR-203. The owner or operator shall conduct and pass the following tests at least once in each consecutive 12-month period following successful completion of start-up testing. Tests shall be conducted and evaluated using the below referenced test methods and standards.
 - a. Static Pressure Performance Test - TP-201.3
 - b. Dynamic Back Pressure Test - TP-201.4 (7/3/02) in accordance with the condition listed in item 1 of the Vapor Collection Section of E.O. VR-203, Exhibit 2. The dynamic back pressure shall not exceed 0.35" WC @ 60 CFH and 0.62" WC @ 80 CFH
 - c. Liquid Removal Test - E.O. VR-203, Exhibit 5, Option 1 (Only test hoses containing more than 25 ml liquid)
 - d. Vapor Pressure Sensor Verification Test - E.O. VR-203, Exhibit 8,
 - e. Veeder-Root Vapor Polisher Operability Test. E.O. VR-203, Exhibit 11
 - f. Veeder-Root Vapor Polisher Emissions Test - E.O. VR-203, Exhibit 12.
5. The applicant shall notify Source Test by email at gdfnotice@baaqmd.gov or by FAX at (510) 758-3087, at least 48 hours prior to any testing required for permitting. Test results for all performance tests shall be submitted in a District-approved format within thirty days of testing. Start-up tests results submitted to the District must include the application number and the GDF number. (For annual test results submitted to the District, enter "Annual" in lieu of the application number.) Test results may be submitted by email (gdfresults@baaqmd.gov), FAX (510) 758-3087) or mail (BAAQMD Source Test Section, 939 Ellis Street, San Francisco CA 94109).
6. The maximum length of the coaxial hose assembly, including breakaway, swivels, and whip hoses, shall be fifteen (15) feet.
7. The dispensing rate shall not exceed ten (10.0) gallons per minute (gpm), nor be less than six (6.0) gpm with the nozzle trigger at the highest setting. Compliance with this condition shall be verified using the applicable provisions of E.O. VR-203, Ex. 5. Flow limiters may not be used.

8. The TLS console controlling the Veeder-Root Vapor Polisher shall be equipped with a printer and have an open RS232 port that is accessible to District staff during operating hours.
9. Except when necessary for testing and maintenance, the Veeder-Root Vapor Polisher shall be on and in automatic vapor processor mode with the inlet valve in the open position per E.O. VR-203, Ex. 2. The handle shall not be removed for any reason.
10. The station shall maintain OSHA-approved access to the Veeder-Root Vapor Polisher. This access should be provided immediately upon request by District personnel.
11. Security tags shall be installed and maintained on the Veeder-Root Vapor Polisher. A Veeder-Root Vapor Polisher Operability Test and a Veeder-Root Vapor Polisher Emissions Test shall be performed after the replacement of any damaged or missing tags using the above referenced test methods and subject to the above notification and reporting requirements.
12. Each storage tank vent pipe shall be equipped with a CARB certified pressure/vacuum relief valve as required by the applicable Phase I E.O.. Vents pipes may be manifolded to reduce the number of relief valves needed. No relief valve shall be installed on the Veeder-Root Vapor Polisher outlet.

Title V Permit Revisions

This plant has a Title V permit. This project will require a minor revision of the Title V permit.

Proposed revisions to the Title V permit are attached.

Recommendation

All fees have been paid. Recommend that an A/C be issued for the above project.

By _____ date _____
Scott Owen
Supervising AQ Engineer

Table IV - A Source-specific Applicable Requirements S-1 GASOLINE DISPENSING FACILITY			
Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 7	Organic Compounds, Gasoline Dispensing Facilities (11/6/2002)		
8-7-113	Tank Gauging and Inspection Exemption	Y	
8-7-114	Stationary Tank Testing Exemption	Y	
8-7-116	Periodic Testing Requirements Exemption	N	
8-7-301	Phase I Requirements		
8-7-301.1	Requirements for Transfers into Stationary Tanks, Cargo Tanks, and Mobile Refuelers	Y	
8-7-301.2	CARB Certification Requirements	Y	
8-7-301.3	Submerged Fill Pipe Requirement	Y	
8-7-301.5	Maintenance and Operating Requirement	Y	
8-7-301.6	Leak-Free and Vapor Tight Requirement for Components	Y	
8-7-301.7	Fitting Requirements for Vapor Return Line	Y	
8-7-301.10	Vapor Recovery Efficiency Requirements for New and Modified Systems	Y	
8-7-301.13	Annual Vapor Tightness Test Requirement	NY	
8-7-302	Phase II Requirements		
8-7-302.1	Requirements for Transfers into Motor Vehicle Fuel Tanks	Y	
8-7-302.2	Maintenance Requirement	Y	
8-7-302.3	Proper Operation and Free of Defects Requirements	NY	
8-7-302.4	Repair Time Limit for Defective Components	NY	
8-7-302.5	Leak-Free and Vapor Tight Requirement for Components	Y	
8-7-302.6	Requirements for Bellows Nozzles	Y	
8-7-302.7	Requirements for Vapor Recovery Nozzles on Balance Systems	Y	
8-7-302.8	Minimum Liquid Removal Rate	Y	
8-7-302.9	Coaxial Hose Requirement	Y	
8-7-302.10	Construction Materials Specifications	Y	
8-7-302.12	Liquid Retain Limitation	NY	
8-7-302.13	Nozzle Spitting Limitation	NY	
8-7-302.14	Annual Back Pressure Test Requirements for Balance Systems	NY	
8-7-303	Topping Off	Y	
8-7-304	Certification Requirements	Y	
8-7-306	Prohibition of Use	NY	
8-7-307	Posting of Operating Instructions	Y	

Table IV - A Source-specific Applicable Requirements S-1 GASOLINE DISPENSING FACILITY			
Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
8-7-308	Operating Practices	Y	
8-7-309	Contingent Vapor Recovery Requirement	Y	
8-7-313	Requirements for New or Modified Phase II Installations	Y	
8-7-316	Pressure Vacuum Valve Requirements, Aboveground Storage Tanks and Vaulted Below Grade Storage Tanks	Y	
8-7-401	Equipment Installation and Modification	Y	
8-7-406	Testing Requirements, New and Modified Installations	Y	
8-7-407	Periodic Testing Requirements	NY	
8-7-408	Periodic Testing Notification and Submission Requirements	NY	
8-7-501	Burden of Proof	Y	
8-7-502	Right of Access	Y	
8-7-503	Record Keeping Requirements	Y	
8-7-503.1	Gasoline Throughput Records	Y	
8-7-503.2	Maintenance Records	Y	
8-7-503.3	Records Retention Time	NY	
Condition #7523			
Part 1	Annual Gasoline throughput shall not exceed 400,000 gallons in any consecutive 12 month period (Basis: Toxic Risk Policy)	N	

Table VII - A Applicable Limits and Compliance Monitoring Requirements S-1 GASOLINE DISPENSING STATION							
Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Throughput	BAAQMD cond # 7523, part 1	N		Gasoline Dispensing throughput <400,000 gallons/year	BAAQMD 8-7-503.1 & 8-7-503.2	P/M	Record keeping

Table VII - A Applicable Limits and Compliance Monitoring Requirements S-1 GASOLINE DISPENSING STATION							
Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Exempt Throughput	BAAQMD 8-7-114	Y		Maximum amount exempt from Phase 1 is: 1000 gallons per facility for tank integrity leak checking	BAAQMD 8-7-501 and 8-7-503.2	P/E	Records
Organic Compounds	BAAQMD 8-7-301.6	Y		All Phase I Equipment (except components with allowable leak rates) shall be leak free (≤ 3 drops/minute) and vapor tight	BAAQMD 8-7-301.13 and 8-7-407	P/A	Annual Check for Vapor Tightness and Proper Operation of Vapor Recovery System
<u>Organic Compounds</u>	<u>BAAQMD Cond #24298 pt. 4</u>	<u>Y</u>		<u>Back Pressure for Vapor Balance, per Executive Order VR-203 shall not exceed 0.35" WC @ 60 CFH and 0.62" WC @ 80 CFH measured using CARB TP201.4 (7/3/02)</u>	<u>BAAQMD 8-7-302.14 and 8-7-407</u>	<u>P/A</u>	<u>Annual Back Pressure Test of Balance Vapor Recovery System</u>
<u>POC</u>	<u>Cond #24298 pt. 4</u>	<u>Y</u>		<u>Liquid Removal Test per CARB E.O. VR-203, Exhibit 5, Option 1</u>	<u>CARB E.O. VR-203</u>	<u>P/A</u>	<u>Annual Liquid Removal Test</u>
<u>POC</u>	<u>Cond #24298 pt. 4</u>	<u>Y</u>		<u>Vapor Pressure Sensor Verification Test per E.O. VR-203, Exhibit 8,</u>	<u>CARB E.O. VR-203</u>	<u>P/A</u>	<u>Annual Vapor Pressure Sensor Verification</u>
<u>POC</u>	<u>Cond #24298 pt. 4</u>	<u>Y</u>		<u>Veeder-Root Vapor Polisher Operability Test. E.O. VR-203, Exhibit 11</u>	<u>CARB E.O. VR-203</u>	<u>P/A</u>	<u>Annual Vapor Pressure Operability Test</u>

Table VII - A Applicable Limits and Compliance Monitoring Requirements S-1 GASOLINE DISPENSING STATION							
Type of Limit	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
<u>POC</u>	<u>Cond #24298 pt. 4</u>	<u>Y</u>		<u>Veeder-Root Vapor Polisher Emissions Test - E.O. VR-203, Exhibit 12</u>	<u>CARB E.O. VR-203</u>	<u>P/A</u>	<u>Annual Vapor Polisher Emissions Test</u>
<u>POC</u>	<u>Cond #20666 pt. 2</u>	<u>Y</u>		<u>Torque Test per CARB TP 201.1B</u>	<u>CARB E.O. VR-102</u>	<u>P/3A</u>	<u>Triennial torque test</u>
<u>POC</u>	<u>Cond #20666 pt. 2</u>	<u>Y</u>		<u>Drob Tube Test per CARB TP 201.1C or 201.1D</u>	<u>CARB E.O. 102</u>	<u>P/3A</u>	<u>Trtiennial druop tube test</u>

Appendix D

Compliance Assurance Monitoring (CAM) Analysis



Lehigh Southwest Cement Company
Permanente Plant
24001 Stevens Creek Boulevard
Phone (408) 998-4000
Fax (408) 725-1019
www.lehighcement.com

August 10, 2009

Thu Bui
Bay Area Air Quality Management District
909 Ellis Street
San Francisco, CA 94109

RE: Lehigh Southwest Cement Company (ID A0017) CAM Analysis

Submitted Electronically – No Hard Copy to Follow

Dear Ms. Bui:

At the request of the Bay Area Air Quality Management District (BAAQMD), Lehigh Southwest Cement Company (Lehigh) is submitting this Compliance Assurance Monitoring (CAM) Analysis as part of the Title V Permit (ID: A0017) renewal. It was determined that while various sources had the potential to be applicable to 40 CFR 64, only 4 sources required Compliance Assurance Monitoring Plans.

CAM Applicability

The US EPA initiated 40 CFR 64 (Compliance Assurance Monitoring or "CAM") in order to provide reasonable assurance that facilities comply with emissions limitations by monitoring the operation and maintenance of their control devices. CAM applies to emissions units that meet all of the following conditions:

- the unit is located at a major source for which a Title V permit is required; and
- the unit is subject to an emission limitation or standard; and
- the unit uses a control device to achieve compliance with a federally enforceable limit or standard; and
- the unit has potential pre-control or post-control emissions of at least 100% of the major source amount; and
- the unit is not otherwise exempt from CAM.

CAM Exemptions

The exemptions listed in Part 64 are related to rules or emissions limitations and not to specific equipment. The exemptions are based on monitoring requirements in those rules or emissions limitations being inherently sufficient to provide assurance of compliance. Under Part 64.2(b)(i), those sources subject to NSPS or NESHAP standards promulgated after 11/15/90, are exempt

Lehigh Southwest Cement Company - CAM Analysis
Page 2 of 3

from CAM. For that reason all sources subject to NESHAP 40 CFR 63, Subpart LLL, promulgated 6/14/1999, are exempt from CAM.

The Lehigh facility is also subject the following NSPS's but since each was promulgated pre-1990, the above exemption does not apply:

- NSPS, Subpart F: Portland Cement Plant (8/17/1971)
- NSPS, Subpart Y: Coal Processing Plants (10/24/1974)
- NSPS, Subpart OOO: Nonmetallic Mineral Processing Plant (8/31/1983)

CAM Analysis

Using the CAM Analysis table template provided by the BAAQMD, Lehigh listed all the permitted sources that are subject to federally enforceable emission limits and standards with respect to particulate matter/ opacity. This CAM Analysis table is provided in the attached Table 1.

For all individual sources subject to NESHAP Subpart LLL, no further verification was performed since the unit was exempt. These sources are indicated in Table 1 as being exempt from CAM pursuant to 40 CFR 63.2(b)(1)(i). For sources not subject to NESHAP Subpart LLL, the next CAM screening level was if the source uses a control device for compliance.

It should be noted that as defined in 40 CFR 64, control devices do not include those devices that are inherent to the process. While several of the water sprays knock-down fugitive dust, their primary function is to wash the rock for further sale. Numerous dust collectors and baghouses are also used for sizing purposes to re-introduce material into the final product and are not considered control devices for this reason.

For those sources that remained potentially applicable to CAM after passing the two screening levels above, the potential to emit (PTE) was calculated. This PTE was based on reported emissions from the 2008 Comprehensive Emission Inventory Report (CEIR) and back-calculating the PTE based on assumed control efficiencies. Note that as the throughput levels and/or operating hours were below the maximum allowed in the permit, reported emissions were adjusted upward to reflect equipment operation under maximum conditions. Table 1 reflects whether the pre-control potential to emit for the remaining sources exceed the 100 ton/year major source threshold. Information supporting the PTE calculations is presented in the attached Table 2.

Conclusion

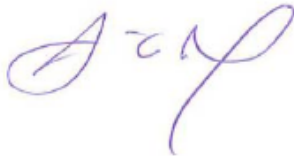
This analysis indicates that four sources should be considered applicable to CAM requirements. As these sources share abatement devices, only two CAM Plans were prepared (one for each abatement device).

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company
24001 Stevens Creek Boulevard Cupertino, CA 95014

Lehigh Southwest Cement Company - CAM Analysis
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If you should have any questions, please give me a call at (408) 996-4262.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Renfrew". The signature is fluid and cursive, with the first letter "S" being large and prominent.

Scott Renfrew

Enclosures

cc. Henrik Wesseling LSCC

Attachment 1:

CAM Applicability Analysis

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company
24001 Stevens Creek Boulevard Cupertino, CA 95014

Lehigh Southwest Cement Company - Permanent Plant
Title V CAM Analysis

Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
1	Gasoline Service Station, G9200	POC	CARB Certified Phase 1	8-7-301	N	Y	N	N	N	PTE < 100 tons
			CARB Certified Phase 2	8-7-302	N			N		
17	Clinker Transfer Area	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-436 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10 ^P (lb/hr. where P is process weight, ton/hr)	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition #16109 Part 1	--		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition #16109 Part 3	--		NE	N		
19	Clinker Storage Area	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-10, 447, 448, 449, 450 Dust Collectors	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10 ^P (lb/hr. where P is process weight, ton/hr)	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition #18473 Part 3	--		NE	N		
21	Roll Press Clinker Surge Bin and Feeder	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-13 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		

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Lehigh Southwest Cement Company - Permanent Plant
Title V CAM Analysis

Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
			FILTERABLE PARTICULATE: 4.10 ^P lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
45	West Silo Top Cement Distribution Tower	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-433 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10 ^P lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition #16109 Part 1	--		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition #16109 Part 3	--		NE	N		
46	Middle West Silo Top Cement Distribution Tower	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-434 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10 ^P lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition #16109 Part 1	--		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition #16109 Part 3	--		NE	N		
47	East Silo Top Cement Distribution Tower	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-435 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		

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Lehigh Southwest Cement Company - Permanent Plant
Title V CAM Analysis

Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
			FILTERABLE PARTICULATE: 4.10 ^{P+1} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition #16109 Part 1	—		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition #16109 Part 3	—		NE	N		
48	Bulk Cement Loadout Tank #1 and #2	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE	N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N	A-420, 421, 422, 428 Dust Collectors	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
			FILTERABLE PARTICULATE: 4.10 ^{P+1} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition #16109 Part 1	—		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition #16109 Part 3	—		NE	N		
49	Bulk Cement Loadout Tank #28	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE	N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N	A-423, 424, 427, 429 Dust Collectors	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
			FILTERABLE PARTICULATE: 4.10 ^{P+1} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition #16109 Part 1	—		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition #16109 Part 3	—		NE	N		
50	Bulk Cement Loadout Tank #29	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE	N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		

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Lehigh Southwest Cement Company - Permanent Plant
Title V CAM Analysis

Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
		Particulate Matter	Visible Particles	6-305	N	A-425, 426, 427, 429 Dust Collectors	NE	N	Exempt - 40 CFR 64.2 (b)(4)(i)	
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{64.2} lb/hr. where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition #16109 Part 1	--		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition #16109 Part 3	--		NE	N		
54	Cement Packer #1	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-430 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(4)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{64.2} lb/hr. where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition #16109 Part 1	--		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition #16109 Part 3	--		NE	N		
55	Cement Packer #2	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-431 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(4)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{64.2} lb/hr. where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition #16109 Part 1	--		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition #16109 Part 3	--		NE	N		

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Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
60	Quarry C Diesel AST	NA	NA	—	—	N	NE	N	NA - No FE Emission Standard	Didn't find any emission limits
74	Type II Mechanical Transfer System	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-98 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10 ^P lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition #6655 Part 1	—		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition #6655 Part 4	—		NE	N		
100	Precalciner Klin Fuel Handling System	Opacity	< 20% opacity	60.252	NSPS 40 CFR 60, Subpart Y (10/24/1974)	A-100 Water Spray System	N	N	N	PTE < 100 tons
		Opacity	Ringelmann 1.0 Limitation	6-301	N			N		
		Particulate Matter	Visible Particles	6-305	N			N		
		Opacity	Ringelmann Number 1 Limitation	BAAQMD Condition # 23942 part 1	N			N		
111	Rail Unloading System Area 1	Opacity	< 20% opacity	60.252	NSPS 40 CFR 60, Subpart Y (10/24/1974)	A-111 Dust Collector	N	N	N	PTE < 100 tons
		Opacity	Ringelmann 1.0 Limitation	6-301	N			N		
		Particulate Matter	Visible Particles	6-305	N			N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10 ^P lb/hr, where P is process weight, ton/hr	6-311	N			N		
112	Additive Hopper Transfer System Area 1	Opacity	< 20% opacity	60.252	NSPS 40 CFR 60, Subpart Y (10/24/1974)			N		
			Ringelmann Number 1 Limitation	6-301	N			N		

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Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
		Particulate Matter	Visible Particles	6-305	N	A-112 Dust Collector	N	N	N	PTE < 100 tons
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10e ⁹ lb/hr, where P is process weight, ton/hr	6-311	N			N		
113	Additive Bin Transfer Facilities Area 1	Opacity	< 20% opacity	60.252	NSPS 40 CFR 60, Subpart Y (10/24/1974)	A-113, 114 Dust Collectors	N	N	N	PTE < 100 tons
		Opacity	Ringelmann 1.0 Limitation	6-301	N			N		
		Particulate Matter	Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10e ⁹ lb/hr, where P is process weight, ton/hr	6-311	N			N		
115	Additive Storage Tripper	Opacity	< 20% opacity	60.252	NSPS 40 CFR 60, Subpart Y (10/24/1974)	A-115 Dust Collector	N	N	N	PTE < 100 tons
		Particulate Matter	Ringelmann Number 1 Limitation	6-301	N			N		
			Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10e ⁹ lb/hr, where P is process weight, ton/hr	6-311	N			N		
121	Tertiary Scalping Screen 2-VS-1, 2-VS-2	Opacity	< 10% opacity	60.62	NSPS 40 CFR 60, Subpart F (8/17/1971)	A-121 Dust Collector	Y	N	Y	
		Particulate Matter	Ringelmann Number 1 Limitation	6-301	N			N		
			Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10e ⁹ lb/hr, where P is process weight, ton/hr	6-311	N			N		

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Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
122	Tertiary Crusher 2-CR-1	Opacity	< 10% opacity	60.62	NSPS 40 CFR 60, Subpart F (8/17/1971)	A-121, 122 Dust Collectors	Y	N	Y	
		Particulate Matter	Ringelmann Number 1 Limitation	6-301	N			N		
			Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10P ^{0.67} lb/hr. where P is process weight, ton/hr	6-311	N			N		
123	Rock Conveying System Area 2	Opacity	< 10% opacity	60.62	NSPS 40 CFR 60, Subpart F (8/17/1971)	A-122, 123 Dust Collectors	N	N	N	PTE < 100 tons
		Particulate Matter	Ringelmann Number 1 Limitation	6-301	N			N		
			Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10P ^{0.67} lb/hr. where P is process weight, ton/hr	6-311	N			N		
131	Rock Sampling System Area 3	Opacity	< 10% opacity	60.62	NSPS 40 CFR 60, Subpart F (8/17/1971)	A-131 Dust Collector	N	N	N	PTE < 100 tons
		Particulate Matter	Ringelmann Number 1 Limitation	6-301	N			N		
			Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10P ^{0.67} lb/hr. where P is process weight, ton/hr	6-311	N			N		
132	Preblend	Opacity	< 10% opacity	60.62	NSPS 40 CFR 60, Subpart F (8/17/1971)	A-132, 133 Dust Collectors	N	N	N	PTE < 100 tons
		Particulate Matter	Ringelmann Number 1 Limitation	6-301	N			N		
			Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		

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			Emission Limit	Basis						
			FILTERABLE PARTICULATE: 4.10P ^{0.85} lb/hr, where P is process weight, ton/hr	6-311	N			N		
134	Preblend Storage Bin 4-S-1, 4-S-2	Opacity	< 10% opacity	60.62	NSPS 40 CFR 60, Support F (8/17/1971)	A-134 Dust Collector	N	N	N	PTE < 100 tons
		Particulate Matter	Ringelmann Number 1 Limitation	6-301	N			N		
			Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10P ^{0.85} lb/hr, where P is process weight, ton/hr	6-311	N			N		
135	High Grade Storage Bin 4-S-3, 4-S-4	Opacity	< 10% opacity	60.62	NSPS 40 CFR 60, Support F (8/17/1971)	A-135 Dust Collector	N	N	N	PTE < 100 tons
		Particulate Matter	Ringelmann Number 1 Limitation	6-301	N			N		
			Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10P ^{0.85} lb/hr, where P is process weight, ton/hr	6-311	N			N		
141	Raw Mill 4-GM-1	Opacity	20% opacity	63.1343	NESHAP 40 CFR 63, Support LLL (6/14/1999)	A-141 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		PM10	0.30 lb/ton of feed (dry basis) to kiln	63.1343	NESHAP 40 CFR 63, Support LLL (6/14/1999)		NE			
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE			
		Particulate Matter	Visible Particles	6-305	N		NE			
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE			
			FILTERABLE PARTICULATE: 4.10P ^{0.85} lb/hr, where P is process weight, ton/hr	6-311	N		NE			
		PM10	36 lb/hr and 0.02 gr/DSCF	BAAQMD Condition #2786 Part B1	—		NE			

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			Emission Limit	Basis						
		NOx	All kiln emission points <1158 lb/hr and <615 ppm averaged for 2 hr	BAAQMD Condition #11780 Part C1	—	N	NE	Y	N - No Control Device	
			<6.4 lb/ton clinker on a 24-hr basis (averaged over 30 days)	BAAQMD Condition #11780 Part C3	—		NE	Y		
		SO2	0.5 ppm continuously for 3 consecutive minutes or 0.25 ppm averaged over 60 consecutive minutes, or 0.05 ppm averaged over 24 hours	9-1-301	Y - Amended	N	NE	Y		
			SO2: 300 ppm (dry)	9-1-304	N		NE	Y		
			Rejection of 90% of the sulfur in the raw feed plus fuel, not requiring 0.6% sulfur coal as the fuel; or 481 lb/hr averaged over the 24 hour day (423 lbs/hr if coal emissions are not monitored)	BAAQMD Condition #2786 Part A1	—		NE	Y		
142	Raw Mill 2 4-GM-2	Opacity	20% opacity	63.1343	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-142 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		PM10	0.30 lb/ton of feed (dry basis) to kiln	63.1343	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE			
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE			
		Particulate Matter	Visible Particles	6-305	N		NE			
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE			
			FILTERABLE PARTICULATE: 4.10 ^{PA1} lb/hr, where P is process weight, ton/hr	6-311	N		NE			
		PM10	36 lb/hr and 0.02 gr/DSCF	BAAQMD Condition #2786 Part B1	—		NE			
		NOx	All kiln emission points <1158 lb/hr and <615 ppm averaged for 2 hr	BAAQMD Condition #11780 Part C1	—	N	NE	Y	N - No Control Device	
			<6.4 lb/ton clinker on a 24-hr basis (averaged over 30 days)	BAAQMD Condition #11780 Part C3	—		NE	Y		
		SO2	0.5 ppm continuously for 3 consecutive minutes or 0.25 ppm averaged over 60 consecutive minutes, or 0.05 ppm averaged over 24 hours	9-1-301	Y - Amended	N	NE	Y		
			SO2: 300 ppm (dry)	9-1-304	N		NE	Y		

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			Emission Limit	Basis						
			Rejection of 90% of the sulfur in the raw feed plus fuel, not requiring 0.6%	BAAQMD Condition #2786 Part A1	—		NE			
143	Raw Mill 1 Separator System 4-SE-3	Opacity	10% opacity	63.1347	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-143 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.87} (b/hr, where P is process weight, ton/hr	6-311	N		NE	N		
144	Raw Mill 2 Separator Circuit 4-SE-4	Opacity	10% opacity	63.1347	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-144 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.87} (b/hr, where P is process weight, ton/hr	6-311	N		NE	N		
151	Homogenizer 5-5-1, 5-5-2	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-151, 152 Dust Collectors	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.87} (b/hr, where P is process weight, ton/hr	6-311	N		NE	N		
153	Klin Feed System	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-153 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Visible Particles	6-305	N	N		NE	N		

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			Emission Limit	Basis						
		Particulate Matter	FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.85} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
154	Calcliner Kiln (Natural Gas, Fuel Oil, Coal and Coke)	Opacity	20% opacity	63.1343	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE	N		
		PM10	0.30 lb/ton of feed (dry basis) to kiln	63.1343	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE	N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N	A-141, 142 Dust Collectors; A-171, 172 Baghouse, Pulse Jet Dust Collectors	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.85} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		PM10	36 lb/hr and 0.02 gr/DSCF	BAAQMD Condition #2786 Part B1	--		NE	N		
		NOx	All kiln emission points <1158 lb/hr and <615 ppm averaged for 3 hr	BAAQMD Condition #11780 Part C1	--	N	NE	Y		
			16.4 lb/ton clinker on a 24-hr basis (averaged over 30 days)	BAAQMD Condition #11780 Part C3	--		NE	Y		
		SO2	0.3 ppm continuously for 3 consecutive minutes or 0.15 ppm averaged over 60 consecutive minutes, or 0.05 ppm averaged over 24 hours	9-1-301	Y - Amended		NE	Y		
			SO2: 300 ppm (dry)	9-1-304	N		NE	Y	N- No Control Device	
			Rejection of 90% of the sulfur in the raw feed plus fuel, not requiring 0.6% sulfur coal as the fuel; or 481 lb/hr averaged over the 24 hour day (423 lbs/hr if coal emissions are not monitored)	BAAQMD Condition #2786 Part A1	--	N	NE	Y		
161	Clinker Cooler 3-CC-1	Opacity	10% opacity	63.1345	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE	N		
		PM10	0.10 lb/ton dry feed	63.1345	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE	N		

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			Emission Limit	Basis						
		Opacity	Ringelmann 1.0 Limitation	6-301	N	A-161, 190 Dust Collectors	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.85} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		PM10	8 lb/hr and 0.01 gr/DSCF	BAAQMD Condition #2786 Part B3	-		NE	N		
162	Clinker Silo A 5-S-11	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-162 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.85} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
163	Clinker Silo B 5-S-12	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-163 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.85} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
164	Free lime Storage Bin	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-164 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		

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Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
			FILTERABLE PARTICULATE: 4.10P ^{16.7} lb/hr. where P is process weight, ton/hr	6-311	N		NE	N		
165	Clinker Transfer System	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-165 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{16.7} lb/hr. where P is process weight, ton/hr	6-311	N		NE	N		
171	Kiln Fuel Mill System	Opacity	< 20% opacity	60.252	NESHAP 40 CFR 60, Subpart Y (10/24/1974)	N - A-171 Baghouse, Pulse Jet Dust Collector is inherent to process	NE	N	N	This baghouse is an inherent process equipment as it is used to collect product that is re-introduced per S. Renfrew.
		Particulate Matter	Ringelmann 1.0 Limitation	6-301	N		NE	N		
			Visible Particles	6-305	N		NE	N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{16.7} lb/hr. where P is process weight, ton/hr	6-311	N		NE	N		
		PM10	6.6 lb/hr and 0.02 gr/dscf	BAAQMD Condition #2786 Part 82	-		NE	N		
172	Precisioner Fuel Mill System	Opacity	< 20% opacity	60.252	NESHAP 40 CFR 60, Subpart Y (10/24/1974)	N - A-172 Baghouse, Pulse Jet Dust Collector is inherent to process	NE	N	N	This baghouse is an inherent process equipment as it is used to collect product that is re-introduced per S. Renfrew.
		Particulate Matter	Ringelmann 1.0 Limitation	6-301	N		NE	N		
			Visible Particles	6-305	N		NE	N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{16.7} lb/hr. where P is process weight, ton/hr	6-311	N		NE	N		
		PM10	6.6 lb/hr and 0.02 gr/dscf	BAAQMD Condition #2786 Part 82	-		NE	N		

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			Emission Limit	Basis						
176	Rock Plant 1 Storage Pile	Opacity	Ringelmann 1.0 Limitation	6-301	N	N	NE	N	No - No control device	
		Particulate Matter	Visible Particles	6-305	N		NE	N		
187	Sand Hopper and Storage Bin	Opacity	Ringelmann 1.0 Limitation	6-301	N	N	NE	N	No - No control device	
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.87} lb/hr. where P is process weight, ton/hr	6-311	N		NE	N		
201	Primary Crusher (Will be removed from service upon startup of S-605 Jaw Crusher)	Opacity	Ringelmann 1.0 Limitation	6-301	N	N	NE	N	No - No control device	
		Particulate Matter	Visible Particles	6-305	N		NE	N		
202	Secondary Crusher	Opacity	Ringelmann 1.0 Limitation	6-301	N	N	NE	N	No - No control device	
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.87} lb/hr. where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 1.0 Limitation	BAAQMD Condition # 23896 Part 2	—		NE	N		
210	Finish Mill (6-GM-1)	Opacity	10% opacity	63.1347	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-210 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann Number 1 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.87} lb/hr. where P is process weight, ton/hr	6-311	N		NE	N		
		PM10	0.006 gr/dscf or 0.9 lb/hr	BAAQMD Condition # 779 Part 2	—		NE	N		

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Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 779 Part 4	—		NE	N		
211	Separator (6-SE-2)	Opacity	10% opacity	63.1347	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-211 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann Number 1 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{(b)(1)} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		PM10	0.006 gr/dscf or 3.6 lb/hr of	BAAQMD Condition # 1545 Part 2	—		NE	N		
216	6-GM-1 Cake Conveyor (6-BC-13)	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-216 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{(b)(1)} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4996 Part 1	—		NE	N		
		PM10	0.0013 gr/dscf	BAAQMD Condition # 4996 Part 4	—		NE	N		
217	6GM1 Cake Conveyor (6-BC-15)	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-217 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{(b)(1)} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		

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			Emission Limit	Basis						
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4996 Part 1	—		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition # 4996 Part 3	—		NE	N		
218	6-GM-1 Air Separator (6-SE 1)	Opacity	10% opacity	63.1347	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-218 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10 ^{PAV} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4997 Part 1	—		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition # 4997 Part 3	—		NE	N		
220	6-GM-2 Mill and Peripherals	Opacity	10% opacity	63.1347	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-220 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10 ^{PAV} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4998 Part 2	—		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition # 4998 Part 3	—		NE	N		
221	6-GM-2 Cake Feeder (6WF2)	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE	N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Visible Particles		6-305	N		NE	N		

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			Emission Limit	Basis						
		Particulate Matter	FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N	A-221 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
			FILTERABLE PARTICULATE: 4.10e ^{PAI} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4996 Part 1	--		NE	N		
		PM10	0.0013 gr/dscf	BAAQMD Condition # 4996 Part 4	--		NE	N		
222	6-GM-2 Gypsum Feeder (SWF4)	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-222 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10e ^{PAI} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4995 Part 1	--		NE	N		
		PM10	0.0013 gr/dscf	BAAQMD Condition # 4995 Part 3	--		NE	N		
230	6-RP-1 Roller Press and Peripherals	Opacity	10% opacity	63.1347	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-230 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10e ^{PAI} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4999 Part 1	--		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition # 4999 Part 3	--		NE	N		
231	Pressed Cake Bin (6-55-2)	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE	N		

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			Emission Limit	Basis						
		Opacity	Ringelmann 1.0 Limitation	6-301	N	A-231 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
		Particulate Matter	FILTERABLE PARTICULATE: 4.10 ^{P(A)} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
			Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4996 Part 1		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition # 4996 Part 3	--		NE	N		
240	Additive Conveyor/Bins	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-240 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
		Particulate Matter	FILTERABLE PARTICULATE: 4.10 ^{P(A)} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
			Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4995 Part 1		NE	N		
242	6-GM-1 Cake Feeder (6-WF 3)	PM10	0.0013 gr/dscf	BAAQMD Condition # 4995 Part 3	--	A-242 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE	N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
		Particulate Matter	FILTERABLE PARTICULATE: 4.10 ^{P(A)} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
242	6-GM-1 Cake Feeder (6-WF 3)	Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4996 Part 1	--	A-242 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		PM10	0.0013 gr/dscf	BAAQMD Condition # 4996 Part 4	--		NE	N		

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			Emission Limit	Basis						
243	6-GM-1 Gypsum Feeder (6-WF-9) - Reclaimed Cement	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-243 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{10.47} (b/hr. where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4995 Part 1	--		NE	N		
		PM10	0.0013 gr/dscf	BAAQMD Condition # 4995 Part 3	--		NE	N		
244	6GM1 Pozzolan Feeder (6-WF-7)	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-244 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{10.47} (b/hr. where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4995 Part 1	--		NE	N		
		PM10	0.0013 gr/dscf	BAAQMD Condition # 4995 Part 3	--		NE	N		
245	6-GM-1 Clay Feeder (6-WF-5) - Gypsum	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-245 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{10.47} (b/hr. where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 4995 Part 1	--		NE	N		

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			Emission Limit	Basis						
		PM10	0.0013 gr/dscf	BAAQMD Condition # 4995 Part 3	—		NE	N		
300	Wet Aggregate Storage Piles	Opacity	< 10% opacity	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)	N	NE	N	NA - Mobile sources are not regulated under title I.	As A-300 is a mobile water truck is not regulated under Part 70 or title I.
		Particulate Matter	Ringelmann 1.0 Limitation	6-301	N		NE	N		
			Visible Particles	6-305	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition # 7252, part 1	—		NE	N		
301	Rail Loadout System	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-301 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.41} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 7837 Part 2	—		NE	N		
		PM10	0.01 gr/dscf	BAAQMD Condition # 7837 Part 3	—		NE	N		
340	Coarse Rock Withdrawal System (S-8C-30, S-8C31)	PM10	0.022 gr/dscf	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)	A-340 Baghouse		N	N	PTE < 100 tons
		Opacity	< 7% or 10% opacity	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)			N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N			N		
		Particulate Matter	Visible Particles	6-305	N		N	N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10P ^{0.41} lb/hr, where P is process weight, ton/hr	6-311	N			N		
		PM10	0.0013 gr/dscf	BAAQMD condition # 7247 Part 3	—			N		

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			Emission Limit	Basis						
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition # 7247 Part 1	—			N		
341	Pre-Crushing Screens Rock Plant 3 (8-VS-50)	PM10	0.022 gr/dscf	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)	A-341 Baghouse	N	N	N	PTE < 100 tons
		Opacity	< 7% or 10% opacity	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)			N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N			N		
		Particulate Matter	Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10P ^{0.87} lb/hr, where P is process weight, ton/hr	6-311	N			N		
		PM10	0.0013 gr/dscf	BAAQMD condition # 7247 Part 3	—			N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition # 7247 Part 1	—			N		
342	Coarse Rock Crushing System 2 ea. Symons 5.5 Ft	PM10	0.022 gr/dscf	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)	A-342 Baghouse	N	N	N	PTE < 100 tons
		Opacity	< 7% opacity	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)			N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N			N		
		Particulate Matter	Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10P ^{0.87} lb/hr, where P is process weight, ton/hr	6-311	N			N		
		PM10	0.0013 gr/dscf	BAAQMD Condition # 7246, part 2	—			N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition # 7246, part 1	—			N		
343	Crushed Rock Returns Conveyor	PM10	0.022 gr/dscf	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)			N		
		Opacity	< 7% or 10% opacity	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)			N		

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Lehigh Southwest Cement Company - Permanente Plant
Title V CAM Analysis

Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
		Opacity	Ringelmann 1.0 Limitation	6-301	N	A-341 Baghouse	N	N	N	PTE < 100 tons
		Particulate Matter	Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10 ^{PM10} lb/hr. where P is process weight, ton/hr	6-311	N			N		
								N		
		PM10	0.0013 gr/dscf	BAAQMD condition # 7247 Part 3	-			N		
344	Wet Screening Feed Conveyor	Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition # 7247 Part 1	-	N - A-350 Water Spray is inherent to process	NE	N	N	Water spray system is considered inherent process equipment not a control device.
		Particulate Matter	Ringelmann 1.0 Limitation	6-301	N			N		
			Visible Particles	6-305	N			N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition # 7248, part 1	-			N		
350	Wet Screening and Conveying	Opacity	< 10% opacity	60.672	NSPS 40 CFR 60, Subpart 000 (8/13/1993)	N - A-350 Water Spray is inherent to process	NE	N	N	Water spray system is considered inherent process equipment not a control device per S. Renfrew.
		Particulate Matter	Ringelmann Number 1 Limitation	6-301	N			N		
			Visible Particles	6-305	N			N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition # 7249, part 1	-			N		
360	Wet Aggregate Loadout System (8-8C-60)	Opacity	< 10% opacity	60.672	NSPS 40 CFR 60, Subpart 000 (8/13/1993)	N - A-360 Water Spray is inherent to process	NE	N	N	Water spray system is considered inherent process equipment not a control device per S. Renfrew.
		Particulate Matter	Ringelmann Number 1 Limitation	6-301	N			N		
			Visible Particles	6-305	N			N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition # 7250, part 1	-			N		
370	Class 2 Aggregate Additive Transfer System (8-8C-35, 8-8C-37)	Particulate Matter	Ringelmann 1.0 Limitation	6-301	N	N - A-360 Water Spray is inherent to process	NE	N	N	Water spray system is considered inherent process equipment not a control device per S. Renfrew.
			Visible Particles	6-305	N			N		

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Lehigh Southwest Cement Company - Permanent Plant
Title V CAM Analysis

Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition # 7250, part 1	—		NE	N		Device per 3.100 review.
380	Sand Transfer Class 2 Hopper	Opacity	< 10% opacity	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)	N	NE	N	No - No control device	
		Particulate Matter	Ringelmann 1.0 Limitation	6-301	N		NE	N		
			Visible Particles	6-305	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition # 7250, part 1	—		NE	N		
381	Sand Storage Pile and Conveyor (8-BC-72)	Opacity	< 10% opacity	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)	N	NE	N	No - No control device	
		Particulate Matter	Ringelmann 1.0 Limitation	6-301	N		NE	N		
			Visible Particles	6-305	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition # 7250, part 1	—		NE	N		
382	Water Clarifier Fines Shipment (8-CLAR-70, 8-BC-70, 8-BC-71)	Opacity	< 10% opacity	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)	N	NE	N	No - No control device	
		Particulate Matter	Ringelmann 1.0 Limitation	6-301	N		NE	N		
			Visible Particles	6-305	N		NE	N		
		Opacity	Ringelmann 0.5 or 10% opacity	BAAQMD Condition # 7250, part 1	—		NE	N		
383	Rock Plant 2 Conveyors	Opacity	Ringelmann 1.0 Limitation	6-301	N	A-384 Baghouse	Y	N	Y	Included since it shares the same abatement device as S-384 and S-384 is subject.
		Particulate Matter	Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10P ^{0.87} lb/hr, where P is process weight, ton/hr	6-311	N			N		
384	Rock Plant 2 Screens - 16 & 17	Opacity	Ringelmann 1.0 Limitation	6-301	N	A-384 Baghouse	Y	N	Y	
		Particulate Matter	Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		

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Lehigh Southwest Cement Company - Permanent Plant
Title V CAM Analysis

Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
			FILTERABLE PARTICULATE: 4.10P ¹⁰ (b/hr. where P is process weight, ton/hr)	6-311	N			N		
390	Conveyor Belt 15-M	Opacity	Ringelmann 1.0 Limitation	6-301	N	A-390 Baghouse	N	N	N	PTE < 100 tons
		Particulate Matter	Visible Particles	6-305	N			N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N			N		
			FILTERABLE PARTICULATE: 4.10P ¹⁰ (b/hr. where P is process weight, ton/hr)	6-311	N			N		
		PM10	0.0013 gr/dscf	BAAQMD condition # 7247 Part 3	--			N		
		Opacity	Ringelmann 0.5	BAAQMD Condition # 7247 Part 1	--			N		
412	Finish Mill 6GM3	Opacity	10% opacity	63.1347	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-218 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ¹⁰ (b/hr. where P is process weight, ton/hr)	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 13900 Part 2	--		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition # 13900 Part 3	--		NE	N		
414	Klin Dust Additive Bin	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)	A-414 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N		NE	N		

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Lehigh Southwest Cement Company - Permanent Plant
Title V CAM Analysis

Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
			FILTERABLE PARTICULATE: 4.10P ^{10.7} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 0.5 Limitation	BAAQMD Condition # 13982 Part 1	—		NE	N		
		PM10	0.01 gr/dscf	BAAQMD Condition # 13982 Part 3	—		NE	N		
415	Finish Mill Building Conveyor	Opacity	10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE	N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE: 0.15 gr/dscf	6-310	N	A-415 Dust Collector	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
			FILTERABLE PARTICULATE: 4.10P ^{10.7} lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		PM10	0.006 gr/dscf	BAAQMD Condition # 21345 Part 3	—		NE	N		
444	Emergency Clinker Conveyor	Opacity	Ringelmann 0.5 or 10% opacity	63.1348	NESHAP 40 CFR 63, Subpart LLL (6/14/1999)		NE	N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N	A-444 Water Spray System	NE	N	Exempt - 40 CFR 64.2 (b)(1)(i)	
		Opacity	Ringelmann 1	BAAQMD Condition # 23416 Part 1	—		NE	N		
501	Emergency Diesel Generator	Opacity	Ringelmann 2.0 Limitation	6-303	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{10.7} lb/hr, where P is process weight, ton/hr	6-311	N	N	NE	N	No - No control device	

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Lehigh Southwest Cement Company - Permanent Plant
Title V CAM Analysis

Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
		SO ₂	< 0.5 ppm continuously for 3 consecutive minutes or 0.25 ppm averaged over 60 consecutive minutes, or 0.05 ppm averaged over 24 hours. Sulfur content of liquid fuel ≤ 0.5% by weight	9-1-301	Y - Amended		NE	N		
				9-1-304	N		NE	N		
502	Emergency Diesel Generator	Opacity	Ringelmann 2.0 Limitation	6-303	N	N	NE	N	No - No control device	
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10 ¹⁰ lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		SO ₂	< 0.5 ppm continuously for 3 consecutive minutes or 0.25 ppm averaged over 60 consecutive minutes, or 0.05 ppm averaged over 24 hours. Sulfur content of liquid fuel ≤ 0.5% by weight	9-1-301	Y - Amended		NE	N		
				9-1-304	N		NE	N		
600	Quarry Blasting and Mobile Operations	Opacity	Ringelmann 1.0 Limitation	6-301	N	N	NE	N	No - No control device	
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10 ¹⁰ lb/hr, where P is process weight, ton/hr	6-311	N		NE	N		
		Opacity	Ringelmann 1	BAAQMD Condition # 2125, part 2	—		NE	N		
601	Rock Hopper (9-DH-1)	Opacity	Ringelmann 1.0 Limitation	6-301, BAAQMD Condition # 23896 Part 2	—	A-4501 Water Spray System	N	N	N	PTE < 100 tons
		Particulate Matter	Visible Particles	6-305	N			N		
602 [Installation date TBD]	Conveyor System (9-PAP-1, 9-BC-1, 9-BC-2) - Source status is Authority to Construct	PM ₁₀	0.022 gr/dscf	60.672	NPS 40 CFR 60, Subpart OOO (8/13/1993)		NE	N		
		Opacity	< 7% or 10% opacity	60.672	NPS 40 CFR 60, Subpart OOO (8/13/1993)		NE	N		

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Title V CAM Analysis

Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
		Opacity	Ringelmann 1.0 Limitation	6-301	N	A-4502, 4503, 4504 Dust Collectors	NE	N	TBD	
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.47} lb/hr. where P is process weight, ton/hr	6-311	N		NE	N		
		PM10	0.0013 gr/dscf	BAAQMD Condition # 23896 Part 2	—		NE	N		
603 [Installation date TBD]	Vibrating Grizzly (9-VG-1) – Source status is Authority to Construct	Opacity	Ringelmann 1	BAAQMD Condition # 23896 Part 1	—	A-4503 Dust Collector	NE	N	TBD	
		PM10	0.022 gr/dscf	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)		NE	N		
		Opacity	< 7% or 10% opacity	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)		NE	N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N		NE	N		
			FILTERABLE PARTICULATE: 4.10P ^{0.47} lb/hr. where P is process weight, ton/hr	6-311	N		NE	N		
		PM10	0.0013 gr/dscf	BAAQMD Condition # 23896 Part 2	—		NE	N		
		Opacity	Ringelmann 1	BAAQMD Condition # 23896 Part 1	—		NE	N		
604 [Installation date TBD]	Vibrating Screen (9-VS-2) – Source status is Authority to Construct	PM10	0.022 gr/dscf	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)	A-4502 Dust Collector	NE	N	TBD	
		Opacity	< 7% or 10% opacity	60.672	NSPS 40 CFR 60, Subpart OOO (8/13/1983)		NE	N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			FILTERABLE PARTICULATE 0.15 gr/dscf	6-310	N		NE	N		

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Title V CAM Analysis

Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90? 40 CFR 64.2(b)(1)(i)	Uses a Control Device for Compliance? 40 CFR 64.2(a)(2)	Pre-Control PTE > MST? 40 CFR 64.2(a)(3)	Continuous Compliance Determination Method in Title V Permit? 40 CFR 64.2(b)(1)(vi)	Subject to CAM?	Comments / Questions
			Emission Limit	Basis						
605 [Installation date TBD]	Jaw Crusher (S-CR-1) - Source status is Authority to Construct		FILTERABLE PARTICULATE: 4.10P ¹⁰ (b/hr. where P is process weight, ton/hr	6-311	N	A-4503 Dust Collector	NE	N	TBD	S-605 replacing S-201. When?
		Opacity	Ringelmann 1.0 limitation	BAAQMD Condition # 23896 Part 2	--		NE	N		
		PM10	0.022 gr/dscf	60.672	NPS 40 CFR 60, Subpart OOO (8/13/1993)		NE	N		
		Opacity	< 7% or 10% opacity	60.672	NPS 40 CFR 60, Subpart OOO (8/13/1993)		NE	N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
			Particulate Weight Limitation 0.15 gr/dscf	6-310	N		NE	N		
606	Storage Piles Area 1		FILTERABLE PARTICULATE: 4.10P ¹⁰ (b/hr. where P is process weight, ton/hr	6-311	N	N	NE	N	NA - Mobile sources are not regulated under title I.	As A-606 is a mobile water truck is not regulated under Part 70 or title I.
		PM10	0.0013 gr/dscf	BAAQMD Condition # 23896 Part 2	--		NE	N		
		Opacity	Ringelmann 1	BAAQMD Condition # 23896 Part 1	--		NE	N		
		Opacity	< 10% opacity	60.672	NPS 40 CFR 60, Subpart OOO (8/13/1993)		NE	N		
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
		Opacity	Ringelmann 1.0 Limitation	BAAQMD Condition # 24274 Part 2	--		NE	N		
607	Storage Piles Area 2	Opacity	< 10% opacity	60.672	NPS 40 CFR 60, Subpart OOO (8/13/1993)	N	NE	N	NA - Mobile sources are not regulated under title I.	As A-607 is a mobile water truck is not regulated under Part 70 or title I.
		Opacity	Ringelmann 1.0 Limitation	6-301	N		NE	N		
		Particulate Matter	Visible Particles	6-305	N		NE	N		
		Opacity	Ringelmann 1.0 Limitation	BAAQMD Condition # 24274 Part 2	--		NE	N		

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Title V CAM Analysis

Source No (S-)	Source Description	Pollutant	Federally Enforceable Emissions Limit or Standard? 40 CFR 64.2(a)(1)		Basis of Limit Proposed > 11/15/90?	Uses a Control Device for Compliance?	Pre-Control PTE > MST?	Continuous Compliance Determination Method in Title V Permit?	Subject to CAM?	Comments / Questions
			Emission Limit	Basis	40 CFR 64.2(b)(1)(i)	40 CFR 64.2(a)(2)	40 CFR 64.2(a)(3)	40 CFR 64.2(b)(1)(vi)		

No. of Appl Sources: 4

N: No
NA: Not Applicable
NE: Not Established

Attachment 2:

**Potential
To Emit**

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company
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Lehigh Southwest Cement Company
Maximum Potential to Emit (PTE) Calculations

Source No (S-)	Source Description	Abatement Device	Material Stream	Applicable Annual Permit Limit	2005 Activity Level	Process Fugitive Emissions (ton/yr)	Dust Collector Emissions (ton/yr)	Total Controlled Emissions - 2005 Level (ton/yr)	Control Efficiency (%)	Uncontrolled Emissions Based on Applicable Limit (ton/yr)
1	Gasoline Service Station, G9200	CARB Certified EVR	Gasoline	400,000 gal/yr	35,592 gal/yr	—	—	1.495E-03	98%	0.84
100	Precalciner Kiln Fuel Handling System	A-100 Water Spray System	Coal&Coke	1.6 MM tons clinker	1.4 MM tons clinker	2.200E-02	—	2.200E-02	70%	0.08
111	Rail Unloading System Area 1	A-111 Dust Collector	Cement	1.6 MM tons clinker	1.4 MM tons clinker	1.390E-02	4.090E-01	4.229E-01	95%	9.67
112	Additive Hopper Transfer System Area 1	A-112 Dust Collector	Cement	1.6 MM tons clinker	1.4 MM tons clinker	2.340E-02	2.470E-01	2.704E-01	95%	6.18
113	Additive Bin Transfer Facilities Area 1	A-113 & A-114 Dust Collectors	Cement	1.6 MM tons clinker	1.4 MM tons clinker	2.340E-02	2.686E+00	2.709E+00	95%	61.94
115	Additive Storage Tripper	A-115 Dust Collector	Cement	1.6 MM tons clinker	1.4 MM tons clinker	1.160E-02	4.090E-01	4.206E-01	95%	9.62
121	Tertiary Scalping Screen 2-VS-1, 2-VS-2	A-121 Dust Collector	Cement	1.6 MM tons clinker	1.4 MM tons clinker	4.830E+00	4.280E+00	9.110E+00	95%	208.27
122	Tertiary Crusher 2-CR-1	A-121 & A-122 Dust Collectors	Cement	1.6 MM tons clinker	1.4 MM tons clinker	1.560E+00	4.874E+00	6.43	95%	147.10
123	Rock Conveying System Area 2	A-122 & A-123 Dust Collectors	Cement	1.6 MM tons clinker	1.4 MM tons clinker	1.890E-01	1.197E+00	1.386E+00	95%	31.69
131	Rock Sampling System Area 3	A-131 Dust Collector	Cement	1.6 MM tons clinker	1.4 MM tons clinker	1.650E+00	1.970E+00	3.620E+00	95%	82.76
132	Preblend	A-132 & A-133 Dust Collectors	Cement	1.6 MM tons clinker	1.4 MM tons clinker	3.370E-01	1.815E+00	2.172E+00	95%	49.66
134	Preblend Storage Bin 4-S-1, 4-S-2	A-134 Dust Collector	Cement	1.6 MM tons clinker	1.4 MM tons clinker	1.780E-01	1.820E+00	1.998E+00	95%	45.68
135	High Grade Storage Bin 4-S-3, 4-S-4	A-135 Dust Collector	Cement	1.6 MM tons clinker	1.4 MM tons clinker	4.790E-03	1.850E+00	1.855E+00	95%	42.40
340	Coarse Rock Withdrawal System (8-BC-50, 8-BC51)	A-340 Baghouse	Rock	5,660 hours	3,319 hours	1.650E-01	2.030E-01	3.680E-01	95%	12.55
341	Pre-Crushing Screens Rock Plant 3 (8-VS-50)	A-341 Baghouse	Rock	5,660 hours	3,812 hours	1.170E+00	3.610E-01	1.531E+00	95%	45.46
342	Coarse Rock Crushing System 2 ea. Symons 5.5 Ft	A-342 Baghouse	Rock	5,660 hours	3,812 hours	6.600E-01	3.190E-01	9.790E-01	95%	29.07
343	Crushed Rock Returns Conveyor	A-341 Baghouse	Rock	5,660 hours	3,812 hours	2.350E-02	3.610E-01	3.845E-01	95%	11.42
383	Rock Plant 2 Conveyors	A-384 Baghouse	Rock	5,660 hours	3,319 hours	7.660E-02	2.420E+00	2.497E+00	95%	85.15
384	Rock Plant 2 Screens - 16 & 17	A-384 Baghouse	Rock	5,660 hours	3,319 hours	2.750E+00	2.420E+00	5.170E+00	95%	176.33
390	Conveyor Belt 15-M	A-390 Baghouse	Rock	5,660 hours	3,319 hours	2.280E-01	5.180E-02	2.798E-01	95%	9.54
601	Rock Hopper (9-OH-1)	A-4501 Water Spray System	Rock	15.8 MM tons rock	15.8 MM tons rock	4.888E-01	—	4.888E-01	95%	9.78

Note: PTE was not calculated for those sources which do not currently hold a PTO.

Attachment 3:

**CAM Plan:
S-121, S-122**

Compliance Assurance Monitoring Plan
Lehigh Southwest Cement Company
Cupertino, California
August 2009

Particulate Fabric Filter Units

I. Background

A. Emissions Units

Description: Mining, Handling and Milling of Cement
Identification: The control devices subject to this CAM Plan are listed on Table 1
Facility: Lehigh Southwest Cement Company (Lehigh)
Cupertino, California
BAAQMD
Facility ID: A0017

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: Regulation 6
Pollutant: Particulate Matter
Limit: Particulate Matter (PM) concentration and mass limits (pound/hour) are expressed in Attachment 1 from BAAQMD Regulation 6.

Monitoring Requirements: *Daily:* Monitor pressure drop readings across the filters, which satisfies CAM requirements under 40 CFR §64.3(b)(4)(iii); and

Periodic Monitoring: Visual inspections (including quarterly), which satisfies CAM requirements under §64.3(b)(4)(iii) and District requirements under District Rule 2-6 (see current Title V Conditions.

C. Control Technology

All of the control systems employ a fabric filter to reduce particulate emissions from limestone processing. Each fabric filter/baghouse is described in greater detail in Table 1.

II. Monitoring Approach

The monitoring approach will consist of daily monitoring of the pressure drop gauges across each fabric filter, coupled with the existing periodic monitoring (quarterly visual inspections) that is currently required under the Title V permit. This level of monitoring is appropriate, as the fabric filter control systems are adequate to demonstrate compliance with District Regulation 6, the only applicable emission limits that apply to these units. Based on discussions with Thu Bui, BAAQMD, a CAM Plan must be submitted for each applicable source at the Cupertino facility, as these units are substantially similar and are used to control particulate emissions from similar operations.¹

The daily monitoring will provide the pressure drop across the fabric filters. This level of monitoring is appropriate, as the baghouse control systems are required only to show compliance with Regulation 6 total particulate concentration and mass limits. Proper operation of the baghouse control system is sufficient to show compliance with these limits.

The current periodic monitoring required under the Title V Permit will continue to be implemented. The key elements of the monitoring approach, including the indicators to be monitored, indicator ranges, and performance criteria are presented in Table 2. With these parameters measured, it will be possible to show reasonable compliance.

Monitoring Approach Justification

I. Background

The Lehigh, Cupertino facility produces Portland cement – a fine gray powder that binds sand and aggregate into concrete. The Portland cement manufacturing process at the Permanent facility consists of mining, and handling of raw materials, raw milling and kiln feed preparation, pyroprocessing, coal preparation, clinker cooling, and finish milling.

Baghouses are installed to recover product and control dust emissions from the kiln, mills, clinker cooler, coal mill, belt conveyor transfer points, bulk unloading stations and at numerous other locations at the facility.

The specific processes at the Cupertino facility that may have the potential to emit over 100 tons of particulate per year pre-control devices are listed in Table 1.

II. Rationale for Selection of Performance Indicators

The chosen indicators are manometers devices, which are designed to determine the pressure drop across the filtration system.

¹ The only control systems at the Lehigh Cupertino facility subject to the CAM are selected PM control systems. No control devices are used to reduce emissions of nitrogen oxides (NOx). There are no significant sources of VOC. Therefore, Part 64 Compliance Assurance Monitoring does not apply to combustion units at the facility (see §64.2(b)).

The chosen indicator for periodic monitoring is visual inspections, consistent with the current Title V permit requirements. When a baghouse is operating correctly there should be no visible emissions.

III. Rationale for Selection of Indicator Ranges

The recommended indicator range standard is 0 – 8 inches water column. The selected range for the pressure drop is based on manufacturer specifications, historical data from normal operating conditions and recommendations made in EPA sample CAM Plans for particulate control systems. Note that the current BACT limits on the permit do not require a specific indicator range. The pressure drop will be recorded daily.

An excursion of the pressure drop triggers a Method 22 visible emission evaluation, corrective action and a reporting requirement. If the reading is outside the range of 0 to 8 inches water, the baghouse will be inspected, and appropriate steps will be taken secure operating pressures at the unit. These appropriate steps may include, but are not limited to the following:

- Inspection of the baghouse control system, including instrumentation, electric motor/fan, and fabric filtration system, with repairs made as necessary
- Inspection of the process equipment that is vented to the control system, and repairs as necessary
- Inspection of the pressure drop indicator, and repairs as necessary

Implementation Plan and Schedule

In accordance with 40 CFR §64.4(e), the following is an implementation plan and schedule by which the facility proposes to perform the necessary installation and testing within 180 days after approval of the part 70 permit, assuming that the CAM compliance strategy proposed in this submittal is approved. All dates are given as days after approval of the new Part 70 permit.

- 0 days: Installation of monitoring and recording equipment
- 180 days: Testing and certification of the monitoring equipment.

The Lehigh Cupertino facility maintains Method 22, and in some cases Method 9 inspection reports. Method 9 inspections will be performed during the first 6 months following the issuance of the permit renewal and provided to the District to demonstrate compliance with the CAM Plan.

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company
24001 Stevens Creek Boulevard Cupertino, CA 95014

Table 1: Equipment Description

Source No (S-)	Source Description	Abatement Device
121	Tertiary Scalping Screen 2-VS-1, 2-VS-2	A-121 Dust Collector
122	Tertiary Crusher 2-CR-1	A-121 & A-122 Dust Collectors

Table 2: Monitoring Approach Parameters

	Indicator No. 1	Indicator No. 2
Indicator	Daily Monitoring - Pressure Drop	Periodic Monitoring - Visual Inspection
Measurement Approach	Particulate emissions are measured with a differential pressure manometer. Manometer is either read / recorded in field or the measurement is updated in the plant's control system / data historian, or other.	Visual emissions from the baghouse exhaust will be monitored periodically as prescribed under the current Title V permit, as appropriate.
Indicator Range	0 – 8 inches water column at each unit (manufacturer specification).	No visual emission.
Data Representativeness	The gauge has a minimum accuracy of ~0.2 inches water.	Measurements are to be made at point of emission.
Verification of Operational Status	NA – Manometers gauges are installed on each unit.	Operator is to perform initial visual inspection; a certified smoke reader, if required, will perform follow-up Method 9 inspection or follow the procedures in the CARB manual "Visible Emissions Evaluation".
QA/QC Practices and Criteria	Manometer gauges will be visually inspected prior to use. Calibration of the meter will be done semiannually.	Will be conducted according to EPA Method 22 or the procedures in the CARB manual "Visible Emissions Evaluation".
Monitoring Frequency	Daily	Upon notice of a public nuisance, or quarterly or annually, as required under the current Title V permit, as appropriate.
Data Collection Procedures	P Pressure drop is recorded either manually or electronically on a daily basis in a log consistent with recordkeeping provisions under current Title V Permit.	Initial VE observation to be documented in a log. Method 9 inspection is to be documented as required under Method or in the CARB manual "Visual Emissions Evaluation." Recordkeeping will be consistent with current Title V Permit.

Attachment 4:

**CAM Plan:
S-383, S-384**

Compliance Assurance Monitoring Plan
Lehigh Southwest Cement Company
Cupertino, California
August 2009

Particulate Fabric Filter Units

I. Background

A. Emissions Units

Description: Mining, Handling and Milling of Cement
Identification: The control devices subject to this CAM Plan are listed on Table 1
Facility: Lehigh Southwest Cement Company (Lehigh)
Cupertino, California
BAAQMD
Facility ID: A0017

B. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: Regulation 6
Pollutant: Particulate Matter
Limit: Particulate Matter (PM) concentration and mass limits (pound/hour) are expressed in Attachment 1 from BAAQMD Regulation 6.

Monitoring Requirements: *Daily:* Monitor pressure drop readings across the filters, which satisfies CAM requirements under 40 CFR §64.3(b)(4)(iii); and

Periodic Monitoring: Visual inspections (including quarterly), which satisfies CAM requirements under §64.3(b)(4)(iii) and District requirements under District Rule 2-6 (see current Title V Conditions.

C. Control Technology

All of the control systems employ a fabric filter to reduce particulate emissions from limestone processing. Each fabric filter/baghouse is described in greater detail in Table 1.

II. Monitoring Approach

The monitoring approach will consist of daily monitoring of the pressure drop gauges across each fabric filter, coupled with the existing periodic monitoring (quarterly visual inspections) that is currently required under the Title V permit. This level of monitoring is appropriate, as the fabric filter control systems are adequate to demonstrate compliance with District Regulation 6, the only applicable emission limits that apply to these units. Based on discussions with Thu Bui, BAAQMD, a CAM Plan must be submitted for each applicable source at the Cupertino facility, as these units are substantially similar and are used to control particulate emissions from similar operations.¹

The daily monitoring will provide the pressure drop across the fabric filters. This level of monitoring is appropriate, as the baghouse control systems are required only to show compliance with Regulation 6 total particulate concentration and mass limits. Proper operation of the baghouse control system is sufficient to show compliance with these limits.

The current periodic monitoring required under the Title V Permit will continue to be implemented. The key elements of the monitoring approach, including the indicators to be monitored, indicator ranges, and performance criteria are presented in Table 2. With these parameters measured, it will be possible to show reasonable compliance.

Monitoring Approach Justification

I. Background

The Lehigh, Cupertino facility produces Portland cement – a fine gray powder that binds sand and aggregate into concrete. The Portland cement manufacturing process at the Permanente facility consists of mining, and handling of raw materials, raw milling and kiln feed preparation, pyroprocessing, coal preparation, clinker cooling, and finish milling.

Baghouses are installed to recover product and control dust emissions from the kiln, mills, clinker cooler, coal mill, belt conveyor transfer points, bulk unloading stations and at numerous other locations at the facility.

The specific processes at the Cupertino facility that may have the potential to emit over 100 tons of particulate per year pre-control devices are listed in Table 1.

II. Rationale for Selection of Performance Indicators

The chosen indicators are manometers devices, which are designed to determine the pressure drop across the filtration system.

¹ The only control systems at the Lehigh Cupertino facility subject to the CAM are selected PM control systems. No control devices are used to reduce emissions of nitrogen oxides (NOx). There are no significant sources of VOC. Therefore, Part 64 Compliance Assurance Monitoring does not apply to combustion units at the facility (see §64.2(b)).

The chosen indicator for periodic monitoring is visual inspections, consistent with the current Title V permit requirements. When a baghouse is operating correctly there should be no visible emissions.

III. Rationale for Selection of Indicator Ranges

The recommended indicator range standard is 0 – 8 inches water column. The selected range for the pressure drop is based on manufacturer specifications, historical data from normal operating conditions and recommendations made in EPA sample CAM Plans for particulate control systems. Note that the current BACT limits on the permit do not require a specific indicator range. The pressure drop will be recorded daily.

An excursion of the pressure drop triggers a Method 22 visible emission evaluation, corrective action and a reporting requirement. If the reading is outside the range of 0 to 8 inches water, the baghouse will be inspected, and appropriate steps will be taken secure operating pressures at the unit. These appropriate steps may include, but are not limited to the following:

- Inspection of the baghouse control system, including instrumentation, electric motor/fan, and fabric filtration system, with repairs made as necessary
- Inspection of the process equipment that is vented to the control system, and repairs as necessary
- Inspection of the pressure drop indicator, and repairs as necessary

Implementation Plan and Schedule

In accordance with 40 CFR §64.4(e), the following is an implementation plan and schedule by which the facility proposes to perform the necessary installation and testing within 180 days after approval of the part 70 permit, assuming that the CAM compliance strategy proposed in this submittal is approved. All dates are given as days after approval of the new Part 70 permit.

- 0 days: Installation of monitoring and recording equipment
- 180 days: Testing and certification of the monitoring equipment.

The Lehigh Cupertino facility maintains Method 22, and in some cases Method 9 inspection reports. Method 9 inspections will be performed during the first 6 months following the issuance of the permit renewal and provided to the District to demonstrate compliance with the CAM Plan.

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company
24001 Stevens Creek Boulevard Cupertino, CA 95014

Table 1: Equipment Description

Source No (S-)	Source Description	Abatement Device
383	Rock Plant 2 Conveyors	A-384 Baghouse
384	Rock Plant 2 Screens - 16 & 17	A-384 Baghouse

Table 2: Monitoring Approach Parameters

Indicator	Indicator No. 1	Indicator No. 2
	Daily Monitoring - Pressure Drop	Periodic Monitoring - Visual Inspection
Measurement Approach	Particulate emissions are measured with a differential pressure manometer. Manometer is either read / recorded in field or the measurement is updated in the plant's control system / data historian, or other.	Visual emissions from the baghouse exhaust will be monitored periodically as prescribed under the current Title V permit, as appropriate.
Indicator Range	0 – 8 inches water column at each unit (manufacturer specification).	No visual emission.
Data Representativeness	The gauge has a minimum accuracy of ~0.2 inches water.	Measurements are to be made at point of emission.
Verification of Operational Status	NA – Manometers gauges are installed on each unit.	Operator is to perform initial visual inspection; a certified smoke reader, if required, will perform follow-up Method 9 inspection or follow the procedures in the CARB manual "Visible Emissions Evaluation".
QA/QC Practices and Criteria	Manometer gauges will be visually inspected prior to use. Calibration of the meter will be done semiannually.	Will be conducted according to EPA Method 22 or the procedures in the CARB manual "Visible Emissions Evaluation".
Monitoring Frequency	Daily	Upon notice of a public nuisance, or quarterly or annually, as required under the current Title V permit, as appropriate.
Data Collection Procedures	Pressure drop is recorded either manually or electronically on a daily basis in a log consistent with recordkeeping provisions under current Title V Permit.	Initial VE observation to be documented in a log. Method 9 inspection is to be documented as required under Method or in the CARB manual "Visual Emissions Evaluation." Recordkeeping will be consistent with current Title V Permit.

Attachment 5:

**BAAQMD Regulation 6:
PM Concentration and Mass Limits**

**REGULATION 6
PARTICULATE MATTER AND VISIBLE EMISSIONS**

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**REGULATION 6
PARTICULATE MATTER AND VISIBLE EMISSIONS**

6-100 GENERAL

6-101 Description: The purpose of this Regulation is to limit the quantity of particulate matter in the atmosphere through the establishment of limitations on emission rates, concentration, visible emissions and opacity.

6-110 Exemption, Temporary Sandblasting Operations: Temporary Sandblasting operations are exempt from the provisions of this Rule. Such operations are subject to the provisions of Regulation 12, Rule 4. (Adopted July 11, 1990)

6-111 Exemption, Open Outdoor Fires: The limitations of this rule shall not apply to emissions arising from open outdoor fires. (Adopted December 19, 1990)

6-200 DEFINITIONS

6-201 Exhaust Gas Volume: The volume of gases discharged from an operation; or an emission point.

6-202 Particulate Matter: Any material which is emitted as liquid or solid particles, or gaseous material which becomes liquid or solid particles at the testing temperatures specified in the Manual of Procedures, excluding uncombined water.

6-203 Process Weight: The total weight of all material introduced into an operation, excluding liquids and gases used solely as fuels, air which is not consumed as a reactant, and combustion air.

6-204 Process Weight Rate: A rate established as follows:

204.1 For continuous or long-run steady-state operations, the total process weight for the entire period of continuous operation or for a typical portion thereof, divided by the number of hours of such period or portions thereof.

204.2 For cyclical or batch operations, the total process weight for a period which covers a complete operation or an integral number of cycles, divided by the hours of actual process operation during such period. Where the nature of any process or operation or the design of any equipment is such as to permit more than one interpretation of this section, that interpretation which results in the minimum value for allowable emission shall apply.

6-300 STANDARDS

6-301 Ringelmann No. 1 Limitation: Except as provided in Sections 6-303, 6-304 and 6-306, a person shall not emit from any source for a period or periods aggregating more than three minutes in any hour, a visible emission which is as dark or darker than No. 1 on the Ringelmann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree. (Amended July 11, 1990)

6-302 Opacity Limitation: Except as provided in Sections 6-303, 6-304 and 6-306, a person shall not emit from any source for a period or periods aggregating more than three minutes in a any hour an emission equal to or greater than 20% opacity as perceived by an opacity sensing device, where such device is required by District regulations.

(Amended July 11, 1990)

6-303 Ringelmann No. 2 Limitation: A person shall not emit for a period or periods aggregating more than three minutes in any hour, a visible emission which is as dark or darker than No. 2 on the Ringelmann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree, nor shall said emission, as perceived by an opacity sensing device in good working order, where such device is required by District regulations, be equal to a greater than 40% opacity, from the following sources:

303.1 Internal combustion engines of less than 25 liters (1500 in³) displacement, or any engine used solely as a standby source of motive power;

Permit Evaluation and Statement of Basis: Site A0017, Lehigh Southwest Cement Company
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- 303.2 Laboratory equipment used exclusively for chemical or physical analyses or experimentation;
- 303.3 Portable brazing, soldering or welding equipment;
- 303.4 Deleted July 11, 1990.(Amended January 5, 1983, July 11, 1990)
- 6-304 **Tube Cleaning:** During tube cleaning, and except for three minutes in any one hour, a person shall not emit from any heat transfer operation using fuel at a rate of not less than 148 GJ (140 million BTU) per hour, a visible emission as dark or darker than No. 2 on the Ringelmann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree, or equal to or greater than 40% opacity as perceived by an opacity sensing device in good working order. The aggregate duration of such emissions in any 24 hour period shall not exceed 6.0 minutes per 1055 GJ (one billion BTU) gross heating value of fuel burned during such 24 hour period.
- 6-305 **Visible Particles:** A person shall not emit particles from any operation in sufficient number to cause annoyance to any other person, which particles are large enough to be visible as individual particles at the emission point or of such size and nature as to be visible individually as incandescent particles. This Section 6-305 shall only apply if such particles fall on real property other than that of the person responsible for the emission.
- 6-306 **Diesel Piledriving Hammers:** Piledriving hammers powered by diesel fuel shall comply with one of the following standards:
- 306.1 A person shall not emit from any diesel piledriving hammer for a period or periods aggregating more than four minutes during the driving of a single pile, a visible emission which is as dark or darker than No. 1 on the Ringelmann Chart, or of such opacity as to obscure an observer's view to an equivalent or greater degree.
- 306.2 A person shall not emit from any diesel piledriving hammer for a period or periods aggregating more than four minutes during the driving of a single pile, a visible emission which is as dark or darker than No. 2 on the Ringelmann Chart or of such opacity as to obscure an observer's view to an equivalent or greater degree provided that the operator utilizes kerosene, smoke suppressing fuel additives and synthetic lubricating oil, and the requirements of Section 6-503 are satisfied. (Adopted July 11, 1990)
- 6-310 **Particulate Weight Limitation:** A person shall not emit from any source particulate matter in excess of 343 mg per dscm (0.15 gr. per dscf) of exhaust gas volume.
- 310.1 Incineration or Salvage Operations. For the purposes of 6-310, the actual measured concentration of particulate matter in the exhaust gas from any incineration operation or salvage operation shall be corrected to the concentration which the same quantity of particulate matter would constitute in the exhaust gas minus water vapor corrected to standard conditions, containing 12% CO₂ by volume, and as if no auxiliary fuel had been used.
- 310.2 Gas-fired Pathological Waste Incinerators. The particulate emissions from gas-fired pathological waste incinerators, where emissions are not mingled with emissions from incineration of general wastes, shall be corrected as specified in Section 6-310.1 except that correction for auxiliary fuel shall not be required.
- 310.3 Heat Transfer Operation. For the purposes of 6-310, the actual measured concentration of particulate matter in the exhaust from any heat transfer operation shall be corrected to the concentration which the same quantity of particulate matter would constitute in the exhaust gas minus water vapor, corrected to standard conditions, containing 6% oxygen by volume.
- 6-311 **General Operations:** In addition to the limitation of Section 6-310, a person shall not discharge into the atmosphere from any general operation particulate matter from any emission point, at a rate in excess of that specified in Table 1 for the process weight rate indicated. This section shall not apply to fuel-fired indirect heat exchangers.

TABLE 1
ALLOWABLE RATE OF EMISSIONS BASED ON PROCESS WEIGHT RATE

Process wt rate = P		Emission = E	
kg/hour	lbs/hour	kg/hour	lbs/hour
250	550	0.8	1.8
300	660	0.9	2.0
400	880	1.1	2.4
500	1100	1.3	2.9
1000	2205	2.1	4.6
2000	4410	3.3	7.3
3000	6615	4.3	9.5
4000	8820	5.2	11.0
5000	11020	6.0	13.0
10000	22045	9.6	21.0
20000	44090	15.2	33.0
over 26000	57320	18.1	40.0

(interpolation formula deleted May 21, 1980. See page 6-5 for formulae.)

Interpolation in kg/hr

$$E \text{ in kg/hr} = 0.02 P^{0.67} \text{ in kg/hr}$$

The interpolation of the data in this Table shall be accomplished by the use of the equation $E = 0.022P^{0.67}$, where E = rate of emission in kg/hour, not to exceed 18.1 kg/hour and P = process weight rate in kg/hour.

Interpolation in lbs/hr

$$E \text{ in lbs/hr} = 4.10 P^{0.67} \text{ in lbs/hr}$$

- 6-320 **Sulfuric Acid Manufacturing Plants:** A person shall not emit from any operation manufacturing sulfuric acid using as a principal raw material any sulfur-containing material, any emission having a concentration of SO₃ or H₂SO₄, or both, expressed as 100% H₂SO₄, exceeding 92 mg per dscm (0.04 gr. per dscf) of exhaust gas volume.
- 6-330 **Sulfur Recovery Units:** A person shall not emit from any operation manufacturing sulfur, using as a principal raw material any sulfur-containing material, any emission having a concentration of SO₃ or H₂SO₄, or both, expressed as 100% H₂SO₄, exceeding 183 mg dscm (0.08 gr. dscf) of exhaust gas volume.
- 6-400 **ADMINISTRATIVE REQUIREMENTS**
- 6-401 **Appearance of Emissions:** Every person responsible for an emission (except from gas fired heat transfer operations regulated by Sections 6-301, 6-303 and 6-304) shall have and maintain means whereby the operator of the plant shall be able to know the appearance of the emission at all times.
- 6-500 **MONITORING AND RECORDS**
- 6-501 **Sampling Facilities and Instruments Required:** Persons subject to this regulation shall provide sampling facilities and install instruments as required pursuant to the provisions of Sections 1-501, 1-520 and 1-521 of Regulation 1.
- 6-502 **Data, Records and Reporting:** Persons monitoring emissions in accordance with the requirements of Sections 1-520 and 1-521 of Regulation 1 shall keep records, report emission excesses and provide summaries of data collected as required by Regulation 1.
- 6-503 **Records:** A person responsible for the operation of a diesel pile-driving hammer who chooses to comply with subsection 6-306.2 shall maintain and have available for inspection records which establish the use of kerosene, smoke suppressing fuel additives and synthetic lubricating oil.
(Adopted July 11, 1990)

6-600 **MANUAL OF PROCEDURES**

- 6-601 **Particulate Matter, Sampling, Sampling Facilities, Opacity Instruments and Appraisal of Visible Emissions:** The MOP contains the testing temperature for the determination of the presence of particulate matter, procedures relating to the siting of sampling facilities, source test procedures, opacity instrument specifications, calibration and maintenance requirements, and the procedure for appraising visible emissions.