

RECEIVED

LEHIGH
HEIDELBERGCEMENT Group

NOV 06 2013

Lehigh Southwest Cement Company
15390 Wonderland Boulevard
Redding, CA 96003
Phone (530) 275-1581

SHASTA COUNTY AQMD

November 5, 2013

Mr. Ross Bell
Air Division Manager
Air Quality Management District
1855 Placer Street, Suite 101
Redding, CA 96001

RE: Title V Permit Minor Revision

Dear Mr. Bell:

Lehigh Southwest Cement Company (Lehigh) operates a Portland Cement Plant that is subject to the Portland Cement Maximum Achievable Control Technology (PC MACT) regulations (40 Code of Federal Regulations (CFR) Part 63, Subpart LLL). In the regulations published in the Federal Register on February 12, 2013, PC MACT facilities are required to submit for approval an Operations & Maintenance (O&M) Plan per §63.1347(a). Since this plan is required to be submitted by February 12, 2014, Lehigh is submitting this minor revision to fulfill that submittal requirement.

If you require any additional information or have any questions please do not hesitate to contact me at (530) 275-1581 ext. 3317.

Sincerely,



Olivia Allsman
Environmental Professional II



**OPEN CLINKER STORAGE PILES
SUPPLEMENT TO OPERATION &
MAINTENANCE PLAN**

PC MACT PROGRAM

**LEHIGH SOUTHWEST CEMENT COMPANY
REDDING, CALIFORNIA FACILITY**

September 2013

Revision 0

TABLE OF CONTENTS

Introduction.....	1
Regulatory Basis.....	1
Location of Clinker Storage Piles	2
Open Clinker Storage Piles Approved Control Measures	2

ATTACHMENTS

ATTACHMENT 1:	Site Specific, Open Clinker Storage Pile Map
ATTACHMENT 2:	Site Specific, Open Clinker Storage Pile Matrix
ATTACHMENT 3:	Administrator Approval Documentation

Introduction

On February 12, 2013, USEPA published the amended Portland Cement NESHAP final rule (40 CFR 63, Subpart LLL),¹ which contained a provision for including within the facility's Operations & Maintenance Plan (O&M Plan) certain measures per 40 CFR 63.1343(c), using the guidance of (40 CFR 63.1347 Operation and Maintenance Plan requirements). The purpose of this document is to comply with the O&M Plan requirements in a clear and concise manner.

The scope of this document includes:

1. The appropriate references to the regulation for guidance,
2. an identification of all current and future open clinker storage piles,
3. a description of the control measures to be applied for each pile, and
4. a description of why the control measures are appropriate for the site conditions.

This document is a required component of compliance with the regulatory requirements of 40 CFR 63, Subpart LLL and is a supplement to the facility's O&M Plan.

Regulatory Basis

The regulatory requirements for the Open Clinker Storage Pile O&M Plan Supplement are located in 40 CFR 63.1343(c) and 63.1347. The following text was taken directly from the regulation as they apply to the facility.

63.1341 Definitions. *(Only applicable definitions have been included herein.)*

All terms used in this subpart that are not defined in this section have the meaning given to them in the CAA and in subpart A of this part.

Clinker means the product of the process in which limestone and other materials are heated in the kiln and is then ground with gypsum and other materials to form cement.

Open clinker storage pile means a clinker storage pile on the ground for more than three days that is not completely enclosed in a building or structure.

40 CFR 63.1343(c) Open clinker storage pile.

(c) Open clinker storage pile. The owner or operator of an open clinker storage pile must prepare, and operate in accordance with, the fugitive dust emissions control measures, described in their operation and maintenance plan (see § 63.1347 of this subpart), that is appropriate for the site conditions as specified in paragraphs (c)(1) through (3) of this section. The operation and maintenance plan must also describe the measures that will be used to minimize fugitive dust emissions from piles of clinker, such as accidental spillage, that are not part of open clinker storage piles.

(1) The operation and maintenance plan must identify and describe the location of each current or future open clinker storage pile and the fugitive dust emissions control measures the

¹ 78 FR 10006.

owner or operator will use to minimize fugitive dust emissions from each open clinker storage pile.

(2) For open clinker storage piles, the operations and maintenance plan must specify that one or more of the following control measures will be used to minimize to the greatest extent practicable fugitive dust from open clinker storage piles: Locating the source inside a partial enclosure, installing and operating a water spray or fogging system, applying appropriate chemical dust suppression agents, use of a wind barrier, compaction, use of tarpaulin or other equally effective cover or use of a vegetative cover. You must select, for inclusion in the operations and maintenance plan, the fugitive dust control measure or measures listed in this paragraph that are most appropriate for site conditions. The plan must also explain how the measure or measures selected are applicable and appropriate for site conditions. In addition, the plan must be revised as needed to reflect any changing conditions at the source.

(3) Temporary piles of clinker that result from accidental spillage or clinker storage cleaning operations must be cleaned up within 3 days.

40 CFR 63.1347 Operation and maintenance plan requirements.

(a) You must prepare, for each affected source subject to the provisions of this subpart, a written operations and maintenance plan. The plan must be submitted to the Administrator for review and approval as part of the application for a part 70 permit and must include the following information:

(1) Procedures for proper operation and maintenance of the affected source and air pollution control devices in order to meet the emissions limits and operating limits, including fugitive dust control measures for open clinker piles, of §§ 63.1343 through 63.1348. Your operations and maintenance plan must address periods of startup and shutdown;

Location of Clinker Storage Piles

Attachment 1 of this document contains the locations of all current or potential future open clinker storage piles located at the facility.

Open Clinker Storage Piles Approved Control Measures

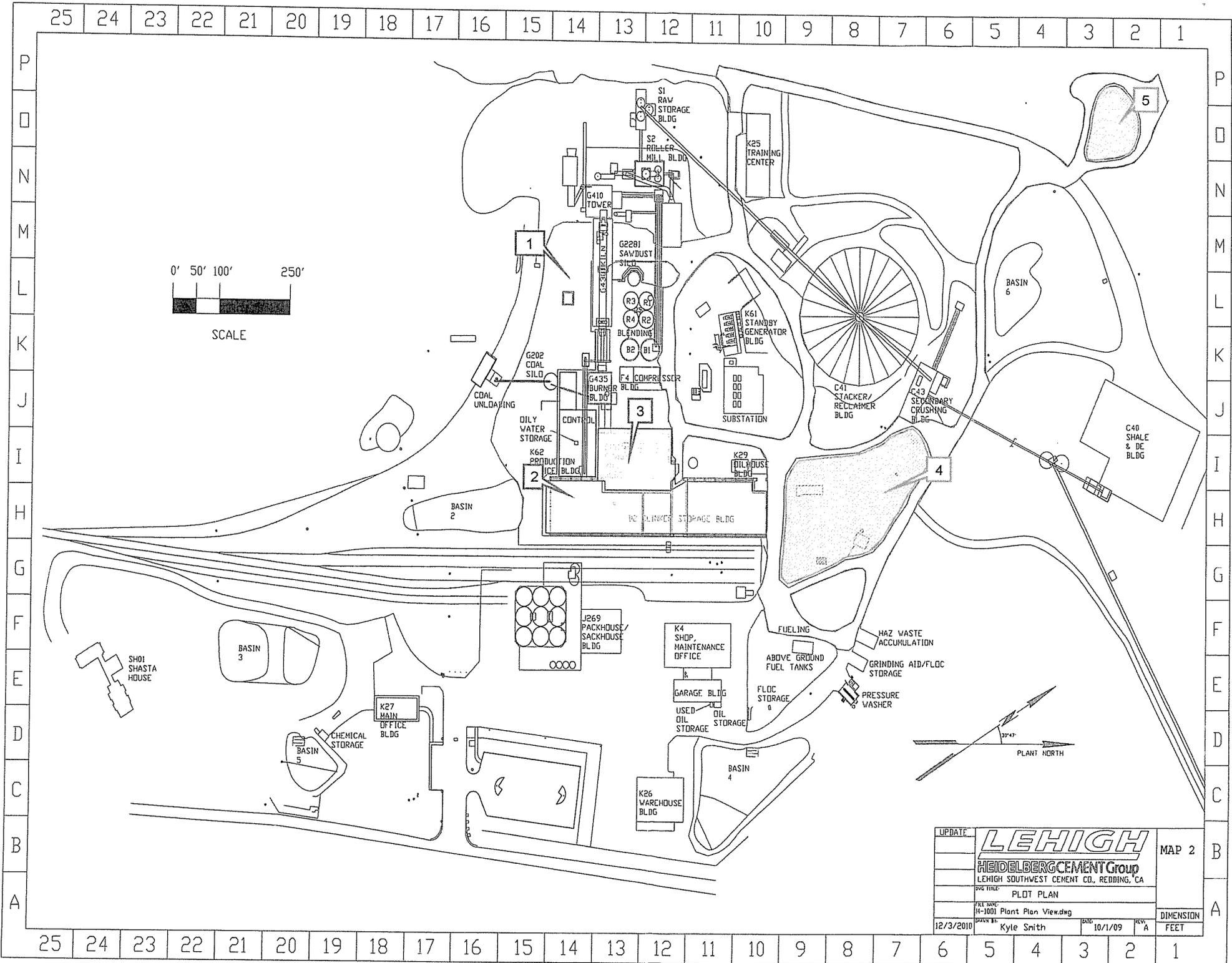
The following is a listing of the approved control measures as outlined in 40 CFR 63.1343(c)(2). The O&M Plan must specify that one or more of the following control measures will be used to the greatest extent practicable to control fugitive dust from the open clinker pile.

- Partial enclosure
- Installing and operating water spray or fogging system
- Application of chemical dust suppression
- Wind barrier
- Compaction
- Use of tarpaulin (tarp) or other equally effective cover
- Vegetative cover

The matrix of open clinker storage pile control measures is contained in Attachment 2. This matrix includes a listing of the control measures as primary or secondary as well as a description of the controls. Note that this matrix includes primary and secondary control measures (if necessary). The facility may revise this matrix as necessary to incorporate any of the above listed measures as either primary or secondary controls. In addition, the matrix contains information that explains how the measure or measures selected are applicable and appropriate for site conditions. Since the above control measures are EPA-approved, any changes to this matrix will be documented at the facility and this plan will be updated and maintained within the facility operating record.

ATTACHMENT 1

Site Specific, Open Clinker Storage Pile Map



UPDATE	LEHIGH			MAP 2
	HEIDELBERGCEMENT Group			
	LEHIGH SOUTHWEST CEMENT CO., REDDING, CA			
	PLT PLAN			
FILE NAME	H-1001 Plant Plan View.dwg			DIMENSION FEET
DRAWN BY	Kyle Smith	DATE	10/1/09	
12/3/2010		REV	A	

ATTACHMENT 2

Site Specific, Open Clinker Storage Pile Matrix

Open Clinker Storage Pile Matrix

Lehigh Southwest Cement Company

Redding, California - September 2013

Map ID	Pile Location Description	Control Measures		Control Description
		Primary Control	Secondary Control	
1	Plant Access Roads	Compaction	Water Spray	Compaction will be applied, water spray will be applied as necessary.
2	Clinker Storage Building	Partial Enclosure	None	This structure is enclosed with the exception of access points.
3	Finish Mill Building	Partial Enclosure	None	This structure is enclosed with the exception of access points.
4	Outdoor Storage Location	Tarping	None	Any piles in this location shall be tarped.
5	Outdoor Storage Location	Tarping	None	Any piles in this location shall be tarped.

Control Measure Choice Justification

Control Measures were selected based on location and site conditions and are believed to be appropriate for site conditions. Compaction was chosen as it compresses the material reducing surface area and the potential to generate fugitive emissions. Although not specifically outlined as a control measure, clinker stored outside will typically react with humidity or precipitation and form a thin crust on the exposed pile surface, also reducing potential fugitive emissions.

ATTACHMENT 3

Administrator Approval Documentation