



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

June 27, 2013

Mr. Michael Meinen
Environmental Manager
Riverside Cement Co. (ID# 800182)
P.O. Box 146
Oro Grande, CA 92368

Dear Mr. Meinen:

SUBJECT: RECLAIM Facility Permit

Please find enclosed a revised Title Page, Table of Content, and Section B of your RECLAIM Facility Permit for your facility located at 1500 Rubidoux Blvd., Riverside, CA 92509. The revised Section B reflects the deductions made to your NOx Allocations based on a self-reported NOx Allocation exceedance for Compliance Year 2012. This deduction was previously explained to you in our May 10, 2013 letter (copy enclosed).

Please review the enclosed pages carefully, insert them into your Facility Permit, and discard the earlier versions of these pages. If you have any questions concerning the changes to your permit, please call Mr. Don Nguyen in the RECLAIM Administration Team at (909) 396-2352.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Mohan Balagopalan', is written over a faint, larger version of the same signature.

Mohan Balagopalan
Senior Manager
Engineering and Compliance Division

MB:DR:DN

Enclosures

cc: Gerardo Rios, EPA Region IX (R9Airpermits_sc@epa.gov)
RECLAIM Administration Team



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
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May 10, 2013

Mr. Michael Meinen
 Riverside Cement Co. (Facility ID # 800182)
 P.O. Box 146
 Oro Grande, CA 92368

Dear Mr. Meinen:

The South Coast Air Quality Management District (AQMD) adopted the RECLAIM program on October 15, 1993 to provide industry clear emission reduction goals without prescribing the method to achieve these goals. One of the requirements of RECLAIM is that participating facilities monitor and report their RECLAIM emissions on an ongoing basis and quarterly reconcile their year-to-date emissions with RECLAIM Trading Credits (RTCs).

Based on your facility's certified emissions reports submitted for the Compliance Year 2012, the NOx emissions from your facility for the period January 1, 2012 through December 31, 2012 exceeded your Allocation as follows:

Quarter	Year-to-Date NOx Emissions (lbs)	Available NOx RTCs (lbs) as of the end of the Quarterly Reconciliation Period			Exceed/Comply	Amount Exceeded By Quarter (lbs)
		NOx RTCs exp. Jun-12	NOx RTCs exp. Dec-12	NOx RTCs exp. Jun-13		
First (1/12-3/12)	128	0	0	(0) Not Available For This Quarter	Exceed	128
Second (4/12-6/12)	240	0	600	(0) Not Available For This Quarter	Comply	None
Third (7/12-9/12)	436	0	600	0	Comply	None
Last (10/12-12/12)	755	0	600	0	Exceed	0

Based on your facility's certified emissions reports submitted for the Compliance Year 2012, the SOx emissions from your facility for the period January 1, 2012 through December 31, 2012 exceeded your Allocation as follows:

Quarter	Year-to-Date SOx Emissions (lbs)	Available SOx RTCs (lbs) as of the end of the Quarterly Reconciliation Period			Exceed/Comply	Amount Exceeded By Quarter (lbs)
		SOx RTCs exp. Jun-12	SOx RTCs exp. Dec-12	SOx RTCs exp. Jun-13		
First (1/12-3/12)	0	0	0	(0) Not Available For This Quarter	Comply	None
Second (4/12-6/12)	0	0	0	(0) Not Available For This Quarter	Comply	None
Third (7/12-9/12)	0	0	0	0	Comply	None
Last (10/12-12/12)	3	0	0	0	Exceed	3

The reason for the exceedances was that your facility did not acquire sufficient RTCs to reconcile with your reported emissions. As a result, your facility is in violation of Rule 2004(b)(1) and Rule 2004(b)(4), which require a facility to have acquired and have credited to the facility sufficient RTCs to reconcile its quarterly emissions, in the first and last quarters, as well as Rule 2004(d)(1), which prohibits a facility's emissions from exceeding its annual Allocations from the beginning of a compliance year through the end of any quarter, in the first and last quarters. A Notice of Violation is enclosed.

Rule 2010(b)(1)(A) requires the exceedance amount to be deducted from the facility's Allocation for the compliance year subsequent to determination of Rule 2004(d)(1) violation. Therefore, the above total NOx exceedance amount of 128 pounds is hereby deducted from your facility's Compliance Year 2014 NOx Allocation (Inland RTCs with expiration date of December 31, 2014). The deducted amounts should be taken into account when you reconcile your emissions with your Allocation for the 2014 compliance year. Alternatively, if you wish to offset this Compliance Year 2012 exceedance with unexpired RTCs with an earlier expiration date (e.g., expiring June 30, 2014), a written request must be sent to RECLAIM Administration.

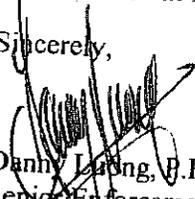
Additionally, the above total SOx exceedance amount of 3 pounds SOx is hereby deducted from your facility's Compliance Year 2014 SOx Allocation (Inland RTCs with expiration date of December 31, 2014). However, since your facility holds 0 pounds Inland RTCs expiring December 31, 2014, this exceedance deduction causes a deficit in your Compliance Year 2014 allocations and as such, you must acquire sufficient RTCs to reconcile both the deficit and your ongoing production emissions by the end of the reconciliation period for the first quarter of the 2014 compliance year pursuant to Rule 2004(b)(1). Alternatively, if you wish to offset this Compliance Year 2012 exceedance with unexpired RTCs with an earlier expiration date (e.g., expiring June 30, 2014), a written request must be sent to RECLAIM Administration.

The above exceedance amounts of 128 pounds of NOx and 3 pounds of SOx are based solely on your facility's certified emissions reports. Once an audit of your facility's records for the subject Compliance Year is completed, AQMD may determine that your facility's emissions are different than you reported, and as a result, may make any changes in the exceedance amount and debit/credit your Allocation account accordingly.

May 10, 2013

If you have any questions on this matter, please contact Mitch Haimov at 909-396-3129.

Sincerely,



Danny Lung, P.E.
Senior Enforcement Manager
RECLAIM Administration
Engineering & Compliance

DL:MH:DN:BK

Enclosure

Certified Mail Return Receipt Requested

Cc: Cher Snyder

Victor Yip



FACILITY PERMIT TO OPERATE

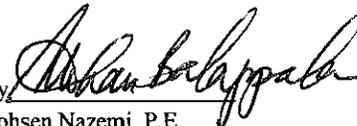
**RIVERSIDE CEMENT CO (EIS USE)
1500 RUBIDOUX BLVD
RIVERSIDE, CA 92509**

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By: 
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance



FACILITY PERMIT TO OPERATE RIVERSIDE CEMENT CO (EIS USE)

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FACILITY PERMIT TO OPERATE RIVERSIDE CEMENT CO (EIS USE)

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NO_x RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NO_x emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NO _x RTC Initially Allocated	NO _x RTC ¹ Holding as of 06/27/2013 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
7/2010 6/2011	Inland	0	28070	2862
1/2011 12/2011	Coastal	0	0	602
1/2011 12/2011	Inland	105818	0	11428
7/2011 6/2012	Inland	0	0	3816
1/2012 12/2012	Coastal	0	0	602
1/2012 12/2012	Inland	105818	86	11428
7/2012 6/2013	Inland	0	0	3816
1/2013 12/2013	Coastal	0	0	602
1/2013 12/2013	Inland	105818	413	11428
7/2013 6/2014	Inland	0	0	3816
1/2014 12/2014	Coastal	0	0	602
1/2014 12/2014	Inland	105818	472	11428
7/2014 6/2015	Inland	0	0	3816
1/2015 12/2015	Coastal	0	0	602
1/2015 12/2015	Inland	105818	600	11428
7/2015 6/2016	Inland	0	0	3816
1/2016 12/2016	Coastal	0	0	602

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.



FACILITY PERMIT TO OPERATE RIVERSIDE CEMENT CO (EIS USE)

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

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RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NOx RTC Initially Allocated	NOx RTC ¹ Holding as of 06/27/2013 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
1/2016 12/2016	Inland	105818	600	11428
7/2016 6/2017	Inland	0	0	3816
1/2017 12/2017	Coastal	0	0	602
1/2017 12/2017	Inland	105818	600	11428
7/2017 6/2018	Inland	0	0	3816
1/2018 12/2018	Coastal	0	0	602
1/2018 12/2018	Inland	105818	600	11428
7/2018 6/2019	Inland	0	0	3816
1/2019 12/2019	Coastal	0	0	602
1/2019 12/2019	Inland	105818	600	11428
7/2019 6/2020	Inland	0	0	3816
1/2020 12/2020	Coastal	0	0	602
1/2020 12/2020	Inland	105818	600	11428
7/2020 6/2021	Inland	0	0	3816
1/2021 12/2021	Coastal	0	0	602
1/2021 12/2021	Inland	105818	600	11428
7/2021 6/2022	Inland	0	0	3816

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
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FACILITY PERMIT TO OPERATE RIVERSIDE CEMENT CO (EIS USE)

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

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The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NOx RTC Initially Allocated	NOx RTC ¹ Holding as of 06/27/2013 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
1/2022 12/2022	Coastal	0	0	602
1/2022 12/2022	Inland	105818	600	11428
7/2022 6/2023	Inland	0	0	3816
1/2023 12/2023	Coastal	0	0	602
1/2023 12/2023	Inland	105818	600	11428
7/2023 6/2024	Inland	0	0	3816
1/2024 12/2024	Coastal	0	0	602
1/2024 12/2024	Inland	105818	600	11428
7/2024 6/2025	Inland	0	0	3816
1/2025 12/2025	Coastal	0	0	602
1/2025 12/2025	Inland	105818	600	11428
7/2025 6/2026	Inland	0	0	3816
1/2026 12/2026	Coastal	0	0	602
1/2026 12/2026	Inland	105818	600	11428
7/2026 6/2027	Inland	0	0	3816
1/2027 12/2027	Coastal	0	0	602
1/2027 12/2027	Inland	105818	600	11428

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
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FACILITY PERMIT TO OPERATE RIVERSIDE CEMENT CO (EIS USE)

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The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NOx RTC Initially Allocated	NOx RTC ¹ Holding as of 06/27/2013 (pounds)	Non-Tradable ²
				Non-Usable RTCs (pounds)
7/2027 6/2028	Inland	0	0	3816
1/2028 12/2028	Coastal	0	0	602
1/2028 12/2028	Inland	105818	600	11428

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.



FACILITY PERMIT TO OPERATE RIVERSIDE CEMENT CO (EIS USE)

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of SO_x RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total SO_x emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	SO _x RTC Initially Allocated	SO _x RTC ¹ Holding as of 06/27/2013 (pounds)	Non-Tradable ² Credits (NTCs) (pounds)
1/2011 12/2011	Inland	88096	0	
1/2012 12/2012	Inland	88096	0	
1/2013 12/2013	Inland	88096	0	
1/2014 12/2014	Inland	88096	-3	
1/2015 12/2015	Inland	88096	0	
1/2016 12/2016	Inland	88096	0	
1/2017 12/2017	Inland	88096	0	
1/2018 12/2018	Inland	88096	0	
1/2019 12/2019	Inland	88096	0	
1/2020 12/2020	Inland	88096	0	
1/2021 12/2021	Inland	88096	0	
1/2022 12/2022	Inland	88096	0	
1/2023 12/2023	Inland	88096	0	
1/2024 12/2024	Inland	88096	0	
1/2025 12/2025	Inland	88096	0	
1/2026 12/2026	Inland	88096	0	
1/2027 12/2027	Inland	88096	0	

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (h)(2) of Rule 2002.



**FACILITY PERMIT TO OPERATE
RIVERSIDE CEMENT CO (EIS USE)**

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of SO_x RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total SO_x emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	SO _x RTC Initially Allocated	SO _x RTC ¹ Holding as of 06/27/2013 (pounds)	Non-Tradable ² Credits (NTCs) (pounds)
1/2028 12/2028	Inland	88096	0	

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (h)(2) of Rule 2002.



FACILITY PERMIT TO OPERATE RIVERSIDE CEMENT CO (EIS USE)

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. If the facility submits a permit application to increase in an annual allocation to a level greater than the facility's starting Allocation plus Non-Tradable credits as listed below, the application will be evaluated for compliance with Rule 2005(c)(4). Rule 2005(e) - Trading Zone Restrictions applies if an annual allocation is increased to a level greater than the facility's Starting Allocation plus Non-Tradable Credits:

Year		Zone	NOx RTC	Non-Tradable
Begin	End		Starting Allocation	Credits(NTC)
(month/year)			(pounds)	(pounds)
1/1994	12/1994	Inland	240204	1011074



**FACILITY PERMIT TO OPERATE
RIVERSIDE CEMENT CO (EIS USE)**

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. If the facility submits a permit application to increase in an annual allocation to a level greater than the facility's starting Allocation plus Non-Tradable credits as listed below, the application will be evaluated for compliance with Rule 2005 (c)(4). Rule 2005 (e) - Trading Zone Restrictions applies if an annual allocation is increased to a level greater than the facility's Starting Allocation plus Non-Tradable Credits:

Year		Zone	SOx RTC	Non-Tradable
Begin	End		Starting Allocation	Credits(NTC)
(month/year)			(pounds)	(pounds)
1/1994	12/1994	Inland	122284	276183