

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Permit Renewal

Facility Name: Riverside Cement Company
Facility ID: 800182
SIC Code: 3241
Equipment Location: 1500 Rubidoux Boulevard
Riverside, CA 92509

Application #(s): 502763
Application Submittal Date(s): 10/1/2009

Permit Revision #: Renewal
Revision Date:
Permit Section(s) Affected: All

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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, CO and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of Riverside Cement Company located at 1500 Rubidoux Boulevard, Riverside. This facility is subject to Title V requirements because it is a major source and is subject to certain NSPS (New Source Performance Standards) and NESHAP (National Emission Standards for Hazardous Air Pollutants) requirements.

2. Facility Description

This is an existing facility that is in the business of producing cement. This facility is operating two cement kilns, crushers, grinders, mills, screens, numerous material conveying equipment, and baghouses to control the particulate emissions.

3. Construction and Permitting History

The facility has been in constant operation since the early 1900's. Numerous permits to construct and permits to operate have been issued to the facility since the 1960's. This proposal is for the purpose of issuing a Title V permit renewal.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is subject to NSPS and NESHAP requirements. NSPS requirements of 40 CFR Part 60 apply to certain units at the facility and the permit terms and conditions may be found in Sections D and H of the Title V permit. NESHAP requirements of 40 CFR Part 63 apply to certain units at the facility and the permit terms and conditions may be found in Sections D, H and J of the Title V permit.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 apply to certain units at the facility and the permit terms and conditions may be found in Section D of the Title V permit.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in

compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

**Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2009**

Pollutant ID	Pollutant Description	Annual Emissions
CO	Carbon Monoxide	0.158
NOX	Nitrogen Oxides	0.308
ROG	Reactive Organic Gases	0.017
SOX	Sulfur Oxides	0.001
TSP	Total Suspended Particulates	3.815

**Toxic Air Contaminants Emissions (TAC) (lbs/year)
Annual Reported Emissions for Reporting Period 2009**

Pollutant ID	Pollutant Description	Annual Emissions
106990	1,3-Butadiene	0.033
75070	Acetaldehyde	0.135
107028	Acrolein	0.015
7664417	Ammonia	67.868
7440382	Arsenic	0.017
71432	Benzene	0.148
7440417	Beryllium	0.000
7440439	Cadmium	0.000
18540299	Chromium (VI)	0.061
7440508	Copper	0.000
9901	Diesel engine exhaust, particulate matter	5.088
100414	ETHYL BENZENE	0.037
50000	Formaldehyde	0.325
110543	HEXANE	0.027
7647010	Hydrochloric acid	0.028
7439921	Lead (inorganic)	0.092
7439965	Manganese	0.000
7439976	Mercury	0.000
91203	Naphthalene	0.004
7440020	Nickel	0.004
1151	PAHs, total, with components not reported	0.005
7782492	Selenium	0.000
108883	Toluene	0.153
1330207	Xylenes	0.108

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Facility Health Risk for 2001 was determined with the following risk factors:

Cancer Risk	7.8 in one million
Acute Hazard Index	0.05
Chronic Hazard Index	0.13

8. Compliance History

As noted, the facility has been in constant operation since the early 1900's. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had 0 citizen complaints filed, 0 Notices to Comply issued, and 0 Notices of Violation issued in the last two calendar years.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.

10. Comments

The two white cement kilns, at this facility, have been placed in a "non-operating" status, and there is no expected restart date at this time.