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

SHASTA COUNTY AQMD

November 7, 2014

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

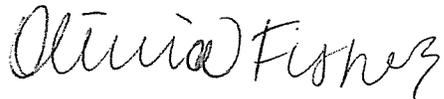
**RE: CAM Plan Submittal**

Dear Mr. Bell:

Attached please find Lehigh Southwest Cement Company's (Lehigh) Compliance Assurance Monitoring Plan (CAM Plan) for dust collectors B-13, B-25, C-36, C-34 and C-38. Lehigh has chosen visual emissions as the appropriate monitoring approach in this CAM Plan as it is adequate to reasonably show compliance with the emissions limitations in the facility's Title V permit.

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 Fisher  
Environmental Professional II

Compliance Assurance Monitoring Plan  
Lehigh Southwest Cement Company  
Redding, California  
October 2014

Particulate Fabric Filter Units

I. Background

1. Emissions Units

Description: Mining, Handling and Milling of Cement  
Identification: The control devices subject to this CAM plan are:  
B-13, B-25, C-36, C-34 and C-38  
Facility: Lehigh Southwest Cement Company (Lehigh)  
Redding, California

2. Applicable Regulation, Emission Limit, and Monitoring Requirements

Regulation No.: District Rule 3:2, Title V Permit  
Pollutant: Particulate Matter  
Limit: 0.1 gr/dscf or 40% opacity  
Monitoring Requirements: *Daily (when operating)*: Monitor visible emissions from fabric filters which satisfies CAM requirements under 40 CFR §64.3(b)(iii) and District requirements under District Rule 3:2 (see current Title V conditions.)

3. Control Technology

All of the control systems employ a fabric filter to reduce particulate emissions from limestone processing. The fabric filters subject to this CAM plan are: B-13, B-25, C-36, C-34 and C-38.

II. Monitoring Approach

The monitoring approach will consist of daily monitoring during operational days of visible emissions as well as periodic visible emissions monitoring required under the Title V permit. This level is appropriate, as the fabric filter control systems are adequate to demonstrate compliance with District Rule 3:2. The current 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 1. With these parameters monitored, it will be possible to show reasonable compliance.

## **Monitoring Approach Justification**

### **I. Background**

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

### **II. Rationale for Selection of Performance Indicators**

The chosen indicator is visual inspection, consistent with the current Title V permit requirements. When a baghouse is operating correctly, there should be no visible emissions. Any visible emissions indicates reduced performance of a particulate control device, therefore, the presence of visible emissions is used as a performance indicator.

### **III. Rationale for Selection of Indicator Ranges**

The recommended indicator range is no visible emissions. All excursions will be documented and reported. An excursion will trigger corrective action including, but not limited to, the following:

1. Inspection of the baghouse control system, including instrumentation, electric motor/fan, and fabric filtration system, with repairs made as necessary.
2. Inspection of the process equipment that is vented to the control system, and repairs as necessary.
3. Method 9 observations, as necessary, to ensure operation below permit limits.

**Table 1**

<b>Indicator</b>	<b>Daily Monitoring</b>
Measurement Approach	Visual emissions from the dust collectors will be monitored daily during operation
Indicator Range	No visible emissions
Data Representativeness	Measurements are to be taken at point of emission
Verification of Operational Status	Operator is to perform visual inspection according to EPA Method 22. A certified smoke reader will perform Method 9 in accordance with the facility's Title V permit.
QA/QC Practices and Criteria	The observer will be familiar with Method 22 and will perform readings accordingly
Monitoring Frequency	Daily
Data Collection Procedures	VE observations to be documented in a log