



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Benjamin H. Grumbles
Director

CERTIFIED MAIL RETURN RECEIPT REQUESTED

July 21, 2009

Gregg St. Clair, Vice President of Cement Operations
Phoenix Cement Company
P.O. Box 428
Clarkdale, AZ 86324

Dear Mr. St. Clair:

Subject: Air Quality Control Permit No. 46157 (Significant revision to Permit No. 35426)
Cement Plant - Place ID: 2393

The Arizona Department of Environmental Quality has received payment of the fee requested. Enclosed is a permit for the referenced facility. In accordance with Arizona Revised Statutes, §49-430, this permit should be readily available at all times on the premises.

The significant permit revision remains in effect until the expiration of Air Quality Control Permit No. 35426. Please continue to keep us informed of any changes that would affect your air pollution status during this period.

This decision is an appealable agency action under A.R.S. § 41-1092. You have a right to request a hearing and file an appeal under A.R.S. § 41-1092.03(B). You must file a written Request for Hearing or Notice of Appeal within **30 days** of your receipt of this Notice. A Request for Hearing or Notice of Appeal is filed when it is received by ADEQ's Hearing Administrator as follows:

Judith Fought, Hearing Administrator
Office of Administrative Counsel
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, AZ 85007

The Request for Hearing or Notice of Appeal shall identify the party, the party's address, the agency and the action being appealed and shall contain a concise statement of the reasons for the appeal. Upon proper filing of a Request for Hearing or Notice of Appeal, ADEQ will serve a Notice of Hearing on all parties to the appeal. If you file a timely Request for Hearing or Notice of Appeal you have a right to request an informal settlement conference with ADEQ under A.R.S. § 41-1092.06. This request must be made in writing no later than **20 days** before a scheduled hearing and must be filed with the Hearing Administrator at the above address.

Northern Regional Office
1801 W. Route 66 • Suite 117 • Flagstaff, AZ 86001
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

You are advised that a permit is a legally enforceable document. If your facility fails to comply with the provisions contained in its permit, you will be subject to enforcement action and could incur civil fines of up to ten thousand dollars per day under A.R.S. §49-463 and/or be subject to criminal penalties in accordance with A.R.S. §49-464.

If you have any questions, contact the Permits Section of the Air Quality Division at (602) 771-2323.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Nancy C. Wrona', with a long horizontal flourish extending to the right.

Nancy C. Wrona, Director
Air Quality Division

NCW: vk2

Enclosures: Permit No.: 46157
Technical Support Document (TSD)
Responsiveness Summary

c.c.: Shirley Rivera, EPA Region IX (via E-mail)

Phoenix Cement Company
Air Quality Permit No. 46157
(Significant Revision to Operating Permit No. 35426)
Responsiveness Summary to Public Comments

INTRODUCTION

Phoenix Cement Company (PCC) was issued Title V Permit No. 1001785 on June 27, 2002, for operation of its Portland cement plant at Clarkdale. The facility was subsequently issued a Significant Permit Revision/Renewal No. 35426 on January 31, 2007, to include into the Title V permit, the equipment associated with the Kiln 4 modernization project. PCC permanently retired the existing Kilns 1, 2 and 3 as a result of the modernization.

The facility is comprised of a limestone quarry and a Portland cement plant. In the quarry, limestone is mined after rock blasting. The current permit limits the use of explosives during blasting to 913 tons per year, 70 tons per day, and 10 tons per hour. The facility has experienced an increase in the overburden of about 20%. Through this permit revision, PCC has requested an increase in the allowable explosive usage to 1,473 tons per year, 113 tons per day and 15 tons per hour.

PUBLIC PARTICIPATION PROCESS

A public notice for the draft permit, including the date and time for a public hearing, was published in The Bugle/Verde Independent and The Daily Courier on March 18, 2009, and March 25, 2009. A public hearing was held in Clarkdale on April 20, 2009.

Verbal and written comments were received during the public comment period. This summary presents the Department's responses to the following issues raised during the public comment period:

Comment: ***Concerns were raised regarding the location of public notice posting.***

Response: The public notice was published in the two local newspapers on March 18, 2009, and March 25, 2009, as required as required under Arizona Administrative Code (A.A.C.) R-18-2-330.C.1. Also, the public notice was posted adjacent to the nearest public roadway on the property where the facility is located as required as required under A.A.C. R-18-2-330.F. The public notice documents were also posted on the Department's Website. The Department has determined that the notice posted met the appropriate legal requirements. In future permitting actions, the Department will explore additional options to enhance the outreach to the public.

Comment: ***Concerns were expressed for the impact of increased pollution on the nearby school and community due to increased blasting.***

Response: At the time of issuance of Permit No. 35426, a dispersion modeling analysis was performed for the facility to assess ambient impacts. The modeling analysis, reproduced in the table below, showed that all the pollutants concentrations were much lower than the applicable National Ambient Air Quality Standards (NAAQS). Although there is a potential increase in emissions due to increased blasting (the increase is less than the significance level for all criteria pollutants),

the facility-wide emission limits as specified in Permit No. 35426, will remain unchanged. Therefore the increased blasting will not adversely impact human health in the community.

NAAQS Modeling Results

Pollutant	National Ambient Air Quality Standards						Modeling					
	Pollutant Concentrations for Applicable Averaging Periods (micrograms per cubic meter)						Modeled Pollutant Concentrations Plus Background for Applicable Averaging Periods (micrograms per cubic meter)					
	1-hr	3-hr	8-hr	24-hr	Quarter	Annual	1-hr	3-hr	8-hr	24-hr	Quarter	Annual
CO	40000		10000				22225.5		4238.6			
PM ₁₀				150		50				92.3		41.0
SO ₂		1300		365		80		260.1		64.1		3.02
NO _x						100						4.1
Lead					1.5						0.003	

Comment: *Concerns were expressed regarding the noise and light pollution from the facility.*

Response: Noise and light issues fall within the purview of local ordinances and regulations. ADEQ has no jurisdiction over these issues.

Comment: *Concerns were also expressed about the facility's overall impact on groundwater quality.*

Response: The facility is covered by appropriate permits under the National Pollutants Discharge Elimination System (NPDES) and Aquifer Protection Permit (APP) programs. Under the NPDES permit program, anyone discharging, or proposing to discharge, waste or wastewater into the surface waters of the State is required by law to obtain a NPDES permit. The NPDES program controls direct discharge into the surface waters of the State by imposing effluent limits and other conditions necessary to meet state and federal requirements to ensure that the discharge does not adversely impact water quality or people's health. Under the APP program, the applicant must show that aquifer water quality standards will not be violated in the aquifer at a point of compliance as a result of discharge from the facility.

Any concerns related to water quality may be addressed to the Water Quality Division of ADEQ at (602) 771-2303.