

Lane Regional Air Protection Agency
 Simple "Low" Air Contaminant Discharge Permit

REVIEW REPORT

Lehigh Southwest Cement
 3300 Marcola Road
 Springfield, Oregon 97477

Permit No. 204745

Source Information:

SIC	5032 – Cement Distribution
NAICS	423320 – Cement Distribution

Source Categories (LRAPA Title 37, Table 1)	B. 16 - Cement Distribution
Public Notice Category	II

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	n
Emission credits	n
Special Conditions	n
Compliance schedule	n

Source test [date(s)]	n
COMS	n
CEMS	n
Ambient monitoring	n

Reporting Requirements:

Annual report (due date)	Feb 15
NSPS Report (due date)	n
Monthly report (due dates)	n

Excess emissions report	y
Other reports	n

Air Programs:

NSPS (list subparts)	n
NESHAP (list subparts)	n
CAM	n
Regional Haze (RH)	n
Synthetic Minor (SM)	n
Part 68 Risk Management	n
Title V	n
ACDP (SIP)	n
New Source Review (NSR)	n
Prevention of Significant Deterioration (PSD)	n
Acid Rain	n
Clean Air Mercury Rule (CAMR)	n
TACT	n

Permitting Action

1. The permit is a renewal for an existing Air Contaminant Discharge Permit (ACDP) which was issued on August 23, 2012 and was originally scheduled to expire on August 23, 2017. The existing permit remains valid until the proposed permit is issued because the facility submitted a timely and complete application for renewal. The facility was issued a “Minimal” ACDP on September 10, 2007 and reclassified to a Simple “Low” on May 8, 2009.

The facility indicated in their 2017 renewal application that no changes have been made to the permit since the last renewal.

Other Permits

2. No other permits have been issued or are required by LRAPA for this facility.

Attainment Status

3. The facility is located in a maintenance area for CO and PM₁₀. The area is in attainment for all other criteria pollutants.

General Background Information

4. The facility operates a bulk cement distribution facility at 3300 Marcola Road in Springfield. The facility controls particulate matter emissions by the use of baghouses.

In 2012 the total cement distributed for the facility was approximately 25,000 tons of Portland cement, and daily cement handled was approximately 200 ton/day on average. The facility currently operates well below the Generic Plant Site Emission Limits (PSELs).

In 2018 the facility indicated that they had unloaded the last of the cement and ceased operations in November 2017. The facility plans to keep the permit active until further notice. The facility applied for a temporary fee reduction, which was approved. The temporary closure will be processed after the permit renewal is issued.

Reasons for Permit Issuance

5. Lane Regional Air Protection Agency (LRAPA) has determined that the facility qualifies for the Simple “Low” fee category for the following reasons: Emissions from this facility are estimated to be less than 5 tons per year of particulate matter and less than 10 tons per year for the criteria gaseous pollutants.

Emission Unit Description

6. Existing air contaminant sources at the facility consist of the following:

EU ID	Emission Unit (EU)	Control Device
EU-1	Cement silos	Baghouses

Compliance History

7. The facility was inspected on July 16, 2007, and on June 8, 2012 and found to be in compliance with permit conditions on both occasions.

Plant Site Emission Limits (PSELS) Information

8. The 2012 estimated maximum production level was 25,000 tons of cement per year.

Annual Plant Site Emission Limits (PSELS)
(tons per year)

Source	PM	PM ₁₀	PM _{2.5}
Cement distribution	24	14	9

- a. The proposed PSELS for all pollutants are equal to the Generic PSEL in accordance with LRAPA 37-0064(3)(b) and the netting basis is zero in accordance with 42-0040(2).
 - b. PSELS for CO, NO_x, SO₂ VOCs, and GHGs are not included in this permit since emissions of these pollutants are less than the respective de minimis emission rates.
 - c. The PSEL is a federally enforceable limit on the potential to emit.
 - d. Recordkeeping of the parameters listed in Condition 10 of the permit will be used to ensure compliance with the PSELS.
9. The pollutants of concern associated with this type of facility are particulate matter (PM). Emissions of the above pollutants are estimated to be minimal. The attachment to this review report contains emissions estimates for the facility's emission units.

Baseline Emission Rate (BER) and Significant Emission Rate (SER)

10. Baseline Emissions were not set in the permit because the facility is well below the Significant Emission Rates (SERs) as listed in Title 12 of LRAPA's Rules and Regulations and because the facility has chosen not to maintain the baseline emissions by way of the Simple ACDP permit type selection.

Hazardous Air Pollutants (HAPs)

11. A major source for hazardous air pollutants (HAP) is a facility that has the potential to emit 10 or more tons per year of any single HAP or 25 or more tons per year of combined HAPs. This source is not a major source of hazardous air pollutants.

NESHAPS/MACT Applicability

12. There are no sources at this facility for which NESHAPS/MACT, (National Emissions Standards for Hazardous Air Pollutants / Maximum Achievable Control Technology), have been

promulgated. This facility does not manufacture cement, (only distributes), and therefore is not subject to any mercury standards that may apply to those types of facilities, also mercury and other HAP emissions are not expected to be significant.

NSPS Applicability

13. There are no sources at this facility for which New Source Performance Standards (NSPS) standards have been promulgated.

Record Keeping and Reporting

14. A record of the following data must be maintained for a period of **five (5) years** at the plant site and must be available for inspection by authorized representatives of LRAPA:

Activity	Parameter	Units	Recording Frequency
Facility	Operation	Hours	Monthly
Baghouse	Operation	Hours	Monthly
Baghouse Maintenance			On Occurrence

15. The facility is required to submit an annual report by **February 15th** each year to include the information identified in item 14 above.

Additional Limitations

16. The facility is subject to the visible emissions standards in LRAPA 32-010(3), the particulate grain-loading standard in LRAPA 32-015(2)(b)(B), the highest and best requirement of LRAPA 32-005. Operation of well-maintained baghouse filters should assure compliance with the grain-loading and visible emissions limits.

Public Notice

17. The draft permit will be on public notice from May 30, 2019 to June 28, 2019. Written comments may be submitted during the 30-day comment period. If requested by ten (10) or more individuals or an individual representing a group of more than ten (10) individuals, there will be a public hearing following the comment period.

After the comment period and hearing (if requested), LRAPA will respond to comments received and then take final action to issue or deny the permit within 45 days of the close of the public comment or hearing period.

Lehigh Southwest Cement Emission Details:

Sandblasting Booth Emissions							
Process	Pollutant	Flow Rate (ACFM)	Emission Factor (gr/cf)	Conversion Factor (lb/gr)	Conversion Factor (min/yr)	Conversion Factor (ton/lb)	Projected Annual Emissions (tons/yr)
Cement Distribution	PM/PM ₁₀ /PM _{2.5}	2,166	0.02	0.000143	525600	0.0005	1.6

ACFM = Actual cubic feet per minute of airflow.

Emission factor provided by baghouse manufacturer is in units of grains per cubic foot of air flow (1 lb = 7,000 grains).

Baghouse emissions assumed to be 100% PM_{2.5} emissions from DEQ AQ-EF08.

Projected annual emissions is the maximum potential to emit if the facility were running 24 hours per day.