

COMMONWEALTH OF PENNSYLVANIA

Department of Environmental Protection

August 1, 2013

814/332-6940

Fax: 814/332-6117

SUBJECT: Review of Application for Administrative Amendment
AUTH ID # 976779
Armstrong Cement & Supply
Winfield Township, Butler County

TO: AQ/Facilities/FACOP/ TV-10-00028

FROM: Matthew Williams *MW*
Facilities Permitting Chief
Air Quality Program - Northwest Region

THROUGH: John F. Guth *JFG*
Air Quality Program Manager
Northwest Region

The subject application is for an administrative amendment to incorporate the conditions of Plan Approval 10-028I and include the revisions of 40 CFR Part 63 Subpart LLL (NESHAPs for the Portland Cement Manufacturing) and ZZZZ (NESHAPs for Stationary Reciprocating Internal Combustion Engines [RICE]) since the November 2012 TV renewal.

Plan Approval #10-028I

The plan approval was for the change of the fuel firing system from a direct-fired coal burning system to a semi-direct coal firing system to reduce NOx formation and to meet the NOx limit of 3.88 lb/ton of clinker produced during the ozone season beginning May 1, 2011. This requirement was derived from 25 Pa Code Chapter 145, Subchapter C- Emissions of NOx from cement manufacturing.

The writer and Ed Orris conducted the inspection for the plan approval on May 14, 2013. Based on demonstrating compliance with each of the plan approval conditions, recommendation that the plan approval be amended into the TV permit was made. The following conditions were incorporated into the operating permit from the plan approval:

- The projected actual emissions from the total of both kilns combined after the modification of the burners will be:
 - a) 936 tons of NO₂, calculated as a 12-month rolling sum;
 - b) 1216 tons of SO₂, calculated as a 12-month rolling sum;
 - c) 22.2 tons of pm, calculated as a 12-month rolling sum;
 - d) 19.2 tons of pm-10, calculated as a 12-month rolling sum;

- e) 14.2 tons of pm 2.5, calculated as a 12-month rolling sum; and,
- f) 56.0 tons of CO, calculated as a 12-month rolling sum
- [The projected actual emissions are not considered enforceable limits but if the facility exceeds the projected actual emissions, the permittee must assess the requirements of 40 CFR Section 52.21(r)(6), including the provisions requiring a report to the Department under 40 CFR Section 52.21(r)(6)(v), and comply with the applicable provisions.]
- a) The NO_x emissions from the exhaust from the combined stack (S01) shall not exceed 4.85 lb/ton NO_x (on a 30-day rolling basis)
- b) The NO_x emissions from the exhaust from the combined stack (S01) shall not exceed 936 tons calculated as a 12-month average.
- [Authority for this condition is also derived from 25 Pa. Code Section 127.203a(5)(iii)(A)]
- (a) The owner or operator shall perform CO, NO_x, SO_x, PM, PM-10 and PM-2.5 emission tests within 6 months of issuance of this plan approval and every five years thereafter to establish the emissions from the kilns that will be reported for inventory and for reporting under 40 CFR 52.21(r)(6)(iii). The facility shall also determine compliance with the emissions limitation for NO_x in this plan approval by performing NO_x testing within 6 months of issuance of this plan approval.
- (b) Pursuant to 25 Pa. Code § 139.53(a)(3), at least 45 calendar days prior to commencing an emissions testing program, a test protocol shall be submitted to the Department for review and approval. The test protocol shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- (c) The emission tests of the above sources shall be performed in accordance with the provisions of Chapter 139 to determine compliance with the respective emissions limits in this condition. The stack tests shall be performed while the aforementioned sources are operating at maximum routine operating conditions. The stack tests shall be performed in accordance with the Department approved methods.
- (d) Pursuant to 25 Pa. Code § 139.53(a)(3) at least 15 calendar days prior to commencing an emission testing program, notification as to the date and time of testing shall be given to the appropriate Regional Office. Notification shall also be sent to the Division of Source Testing and Monitoring. Notification shall not be made without prior receipt of a protocol acceptance letter from the Department.
- (e) Pursuant to 25 Pa. Code Section § 139.53(a)(3) within 15 calendar days after completion of the on-site testing portion of an emission test program, if a complete test report has not yet been submitted, an electronic mail notification shall be sent to the Department's Division of Source Testing and Monitoring indicating the completion date of the on-site testing.
- (f) Three complete test reports shall be submitted to the Department no later than 60 calendar days after completion of the on-site testing portion of an emission test program.
- (g) Pursuant to 25 Pa. Code Section § 139.53(b) a complete test report shall include a summary of the emission results on the first page of the report indicating if each pollutant measured is within permitted limits and a statement of compliance or non-compliance with all applicable permit conditions. The summary results will include, at a minimum, the following information:
 - A statement that the owner or operator has reviewed the report from the emissions testing body and agrees with the findings.
 - Permit number(s) and condition(s) which are the basis for the evaluation.

- Summary of results with respect to each applicable plan approval condition.
- Statement of compliance or non-compliance with each applicable plan approval condition.
- (h) Pursuant to 25 Pa. Code § 139.3 all submittals shall meet all applicable requirements specified in the most current version of the Department's Source Testing Manual.
- (i) All testing shall be performed in accordance with the provisions of Chapter 139 of the Rules and Regulations of the Department of Environmental Protection.
- (j) Pursuant to 25 Pa. Code Section § 139.53(a)(1) and § 139.53(a)(3) all submittals, besides notifications, shall be accomplished through PSIMS*Online, available through <https://www.depgreenport.state.pa.us/ecommm/Login.jsp>, when it becomes available. If internet submittal cannot be accomplished, three copies of the submittal shall be sent to the Pennsylvania Department of Environmental Protection, Bureau of Air Quality, Division of Source Testing and Monitoring, 400 Market Street, 12th Floor Rachael Carson State Office Building, Harrisburg, PA 17105-8468 with deadlines verified through document postmarks.
- The facility shall monitor the following parameters associated with the new burner design no less frequently than once per day while the kiln is operating:
 - a) primary air volume supplied to the burner;
 - b) kiln excess O₂
 - c) fuel moisture of the coal
 - d) fuel rate
- The permittee shall keep a copy of the manufacturer's recommended preventive maintenance schedule for the burners and make it available to the Department upon request.
- The facility shall keep a copy of the following records relating to the burner modification:
 - a) primary air volume supplied to the burner;
 - b) kiln excess O₂
 - c) fuel moisture of the coal
 - d) fuel rate
- a) The facility shall keep a record of the quantity of #2 fuel oil used during start-up for each of the kilns.
- b) The facility shall keep a record of the quantity of bituminous coal used for each of the kilns.
- The facility shall conduct burner tune-ups and adjustments in accordance with the manufacturer's specifications.
- The following conditions pertain to the NSR pollutants (as defined in Part 52.21) identified in the emission restriction section above:
- [40 CFR 52.21(r)(6)]

- (6) Except as otherwise provided in paragraph (r)(6)(vi)(b) of this section, the provisions of this paragraph (r)(6) apply with respect to any regulated NSR pollutant emitted from projects at existing emissions units at a major stationary source (other than projects at a source with a PAL) in circumstances where there is a reasonable possibility, within the meaning of paragraph (r)(6)(vi) of this section, that a project that is not a part of a major modification may result in a significant emissions increase of such pollutant, and the owner or operator elects to use the method specified in paragraphs (b)(41)(ii)(a) through (c) of this section for calculating projected actual emissions.
 - Before beginning actual construction of the project, the owner or operator shall document and maintain a record of the following information:
 - (a) A description of the project;
 - (b) Identification of the emissions unit(s) whose emissions of a regulated NSR pollutant could be affected by the project; and
 - (c) A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded under paragraph (b)(41)(ii)(c) of this section and an explanation for why such amount was excluded, and any netting calculations, if applicable.
 - (ii) NA
 - (iii) The owner or operator shall monitor the emissions of any regulated NSR pollutant that could increase as a result of the project and that is emitted by any emissions unit identified in paragraph (r)(6)(i)(b) of this section; and calculate and maintain a record of the annual emissions, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change, or for a period of 10 years following resumption of regular operations after the change if the project increases the design capacity or potential to emit of that regulated NSR pollutant at such emissions unit. For purposes of this paragraph (r)(6)(iii), fugitive emissions (to the extent quantifiable) shall be monitored if the emissions unit is part of one of the source categories listed in paragraph (b)(1)(iii) of this section or if the emissions unit is located at a major stationary source that belongs to one of the listed source categories.
 - (iv) NA
 - (v) If the unit is an existing unit other than an electric utility steam generating unit, the owner or operator shall submit a report to the Administrator if the annual emissions, in tons per year, from the project identified in paragraph (r)(6)(i) of this section, exceed the baseline actual emissions (as documented and maintained pursuant to paragraph (r)(6)(i)(c) of this section), by a significant amount (as defined in paragraph (b)(23) of this section) for that regulated NSR pollutant, and if such emissions differ from the preconstruction projection as documented and maintained pursuant to paragraph (r)(6)(i)(c) of this section. Such report shall be submitted to

the Administrator within 60 days after the end of such year. The report shall contain the following:

- (a) The name, address and telephone number of the major stationary source;
 - (b) The annual emissions as calculated pursuant to paragraph (r)(6)(iii) of this section; and
 - (c) Any other information that the owner or operator wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).
- (vi) A "reasonable possibility" under paragraph (r)(6) of this section occurs when the owner or operator calculates the project to result in either:
 - (a) A projected actual emissions increase of at least 50 percent of the amount that is a "significant emissions increase," as defined under paragraph (b)(40) of this section (without reference to the amount that is a significant net emissions increase), for the regulated NSR pollutant; or
 - (b) A projected actual emissions increase that, added to the amount of emissions excluded under paragraph (b)(41)(ii)(c) of this section, sums to at least 50 percent of the amount that is a "significant emissions increase," as defined under paragraph (b)(40) of this section (without reference to the amount that is a significant net emissions increase), for the regulated NSR pollutant. For a project for which a reasonable possibility occurs only within the meaning of paragraph (r)(6)(vi)(b) of this section, and not also within the meaning of paragraph (r)(6)(vi)(a) of this section, then provisions (r)(6)(ii) through (v) do not apply to the project.
 - [40 CFR 52.21(r)(7)]
 - (7) The owner or operator of the source shall make the information required to be documented and maintained pursuant to paragraph (r)(6) of this section available for review upon a request for inspection by the Administrator or the general public pursuant to the requirements contained in §70.4(b)(3)(viii) of this chapter.
 - The following condition pertains to the NO_x emission regulated in 25 Pa. Code Section 127, Subchapter E:
 - a) The owner or operator shall monitor the emissions of the regulated NSR pollutant for which a limit is established and calculate and maintain a record of emissions, in TPY on a calendar year basis, for 5 years following resumption of regular operations after the change, or for 10 years following resumption of regular operations after the change if the project increases the design capacity or potential to emit of that regulated NSR pollutant at the emissions unit.
 - b) The owner or operator shall record sufficient information to identify for all emission units in the approved project their total actual annual emissions and their actual annual emissions increase due to the project.

- c) The owner or operator shall submit a report to the Department, within 60 days after the end of each calendar year, which contains the emissions data required by the preceding paragraphs. This report must also contain a demonstration of how these emissions were determined if the determination was not by direct measurement with a Department-certified CEMS system.
- [Authority for this condition is also derived from 25 Pa. Code Section 127.203a(5)(iii)]

Additional Notes:

The EPA made revisions to 40 CFR Part 63 Subpart LLL and ZZZZ. These revisions were incorporated into the Title V Operating Permit during the November 2012 renewal. These Subparts were amended on February 12, 2013 and January 30, 2013, respectively and the permit has been amended to reflect the revisions. The LLL revisions affected the Site Level and Sources 101, 105, 121, and 122. The ZZZZ revisions affected Source 140.

The Department also added the requirement of §121.7 which states “No person may permit air pollution as that term is defined in the act”. This requirement was added to the restrictions in Section C of the permit.

The following summarizes the changes made to Source 140 pertaining to the Subpart ZZZZ amendment:

- §63.6595, §63.6605, and §63.6640(a) – These sections referred to “..compliance with the emission limitations and operating limitations..”. The amendment modified the language to reflect “emission limitation, operating limitations, and other requirements”
- §63.6640(f) – paragraph (f) was revised to include the amendment which reflects the allowance of operation of the unit for an emergency demand response, a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency, peak shaving, and 50 hours of non-emergency situations.
- §63.6625(i) – The wording regarding “changing the oil within 2 days” was changed to clarify that it is 2 business days.
- §63.6655(f) – The language was revised in the amendment to reflect the owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(2)(ii) or (iii) or §63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.
- §63.6650(h) - This paragraph was added in the draft amendment to reflect emergency engines that are contractually obligated to be available for more than 15 hours per year for the purposes specified in §63.6640(f)(2) or (f)(4) immediately preceding this paragraph. The facility must submit an annual report. The report must contain the company name and address, beginning and end date of the reporting period, engine site rating and model year. Latitude and Longitude of the engine, hours operated for the purposes specified directly above, and the hours contractually obligated to be operated for the purposes specified directly above. Pursuant to the comments submitted from the company on July 25, 2013, this paragraph is not applicable because the

facility does not operate the generator, and is not contractually obligated to be available, for more than 15 hours per calendar year for the purposes specified in §63.6640(f)(2)(ii), (iii) or 6640(f)(4)(ii). Therefore this paragraph is not applicable.

- §63.6685(f) – This paragraph was added in the amended regulation but is not applicable to this source and is denoted as not applicable in the permit.

The facility will be submitting a plan approval in the next few months to address the controls that will be necessary to demonstrate compliance with 40 CFR 63 Subpart LLL. The permit includes all of the Subpart LLL requirements that apply to the facility and will be revised at a later date based on the controls installed and demonstration with the limits in Subpart LLL. The facility must comply with the emission limits by September 9, 2015. The following summarizes the changes made to Site Level pertaining to the Subpart LLL amendment:

- §63.1340(b)(1, and 6-9) – Revised text included in the permit which addresses which parts of the plant are covered by this Subpart.
- §63.1340(c) – Revised text included in the permit. Sources onsite subject to nonmetallic mineral processing plants are not subject to the requirements of LLL since they are subject to 40 CFR 60 Subpart OOO.
- §63.1341 – Additional / Revised definitions can be found in the regulation but only the reference to the definitions was included in the permit.
- §63.1344 – The revised language (pertaining to affirmative defense for violation of emission standards during malfunction) which replaced the original text was included in the permit.
- §63.1345 – This section refers to a facility which is a major source. Although the regulation was revised, it does not apply to this facility.
- §63.1347(a)(1) Modified language was incorporated into the permit addressing the operation and maintenance plan.
- §63.1348(a)(1&2) – Introductory text was revised to reflect amended language pertaining to the initial performance test for PM and opacity compliance.
- §63.1348(a)(3)(i) – Adding “The owner or operator of a kiln with an in-line raw mill must demonstrate compliance by conducting separate performance tests while the raw mill is operating and while the raw mill is not operating. Determine the D/F TEQ concentration for each run and calculate the arithmetic average of the TEQ concentrations measured for the three runs to determine continuous compliance.” These two sentences were added from the amended requirement.
- §63.1348(a)(3)(ii-iv) – Revised language from the amendment included in the permit addressing the D/F emission limitation demonstrating compliance using the arithmetic temperature of the three test runs and if activate carbon is used it addresses the injection rate and the carrier gas parameter.
- §63.1348(a)(4-7) – Revised language from the amendment included in the permit pertaining to THC compliance demonstration, Mercury compliance demonstration, HCl compliance demonstration, and commingled exhaust requirements.
- §63.1348(b) – Included revised language from the amendment reflecting the continuous monitoring requirements.
- §63.1348(c)(2)(iv) – Revised language from the amendment included in the permit reflecting the performance test being completed within 360 hours after the planned operational change period begins.

- §63.1349(a) – The introductory text was revised in the amendment and included in the permit pertaining to performance testing requirements.
- §63.1349(b)(1), (b)(3), (b)(3)(v), (b)(4-8) – Revised to reflect the amendment reflecting the PM emission tests, D/F emission tests, THC emission tests, Mercury emission tests, HCl emission tests, Total Organic HAP emission tests, and HCl tests with SO₂ monitoring.
- §63.1349(c), (d)(1), (d)(1)(ii), (d)(2), and (e) – Revised to reflect the amendment pertaining to the performance test frequency, the reporting requirements of the test, and the conditions of the performance test.
- §63.1350(a-d), (f), (g), (h), (i), (k- p) – Revised to reflect the amendment pertaining to the continuous monitoring data, CMS, PM CPMS, clinker production monitoring, opacity monitoring, temperature monitoring, carbon injection rate, THC monitoring system, Mercury monitoring requirements, HCl monitoring requirements, parameter monitoring, continuous flow rate monitoring, and alternate monitoring requirements.
- §63.1351(c-d) and added (e) – Existing sources compliance date is now September 9, 2015. New sources have a compliance date of February 12, 2013 or startup, whichever is later. Open clinker storage piles compliance date is February 12, 2014. These changes were made to the permit.
- §63.1353(b)(6) – A notice within 48 hours of an exceedance that triggers retesting or to establish compliance and new operating limits was added to reflect the amended requirement.
- §63.1354(b)(4-5) – These two sections were reserved.
- §63.1354(b)(9)(vi) and (vii) – The revised and new requirement were included in the permit pertaining to submitting reports of PM, HCl, Hg, and THC CEMs to EPA's WebFIRE database.
- §63.1354(c) – This condition was revised to reflect the amended reporting requirements pertaining to a failure to meet a standard due to a malfunction and reporting those failures in the semi-annual compliance report.
- §63.1355(f) and (g)(1) and adding (h) – Pertaining to the revisions to reflect the recordkeeping for startup and shutdown and recordkeeping for exceedances.
- §63.1356 – This condition was revised to reflect the amended language pertaining to sources with multiple emissions limits or monitoring requirements
- §63.1357(a)(1-2) – This condition was revised to reflect the amended requirement for temporary, conditioned exemption from particulate matter and opacity standards.

The following summarizes the changes made to Sources 101 and 121 (kilns) pertaining to the Subpart LLL amendment:

- §63.1343 – The emission limits (other than during startup or shutdown) are as follows: PM- 0.07 lb/ton of clinker [The initial and subsequent PM performance tests are performed using Method 5 or 5I and consist of three 1-hr tests.] D/F- 0.20 ng per dscm (8.7 x 10⁻¹¹ gr per dscf) (TEQ) [With an oxygen correction factor of 7 percent.]; or 0.40 ng per dscm (TEQ) [With an oxygen correction factor of 7 percent.] If the average temperature at the inlet to the first particulate matter control device (fabric filter or electrostatic precipitator) during the D/F performance test is 400 °F or less. Mercury- 55 lb/MM tons clinker THC- 24 ppmvd [With an oxygen correction factor of 7 percent.] [Measured as propane] [Any source subject to the 24 ppmvd THC limit may elect to meet an alternative limit of 12 ppmvd for total organic HAP.
- §63.1343 – The facility must meet the requirements of §63.1346(f) during startup and shutdown mode.

- §63.1343 – The open clinker storage pile requirements from the amendment are included in paragraph (c). The existing limits for the facility prior to the September 9, 2015 emission limits identified directly above are included in paragraph (d).
- §63.1346(a) – Introductory text and paragraph (a)(1) was revised to reflect the amended regulation which pertains to the D/F operating limits for kilns.
- §63.1346(c-f) – Revised language was incorporated into the permit. Paragraph (g) was added to address startup and shutdown.
- §63.1352(b) – This paragraph was revised to reflect the amended requirement for additional test methods.

The following summarizes the changes made to Sources 105 and 122 (clinker coolers) pertaining to the Subpart LLL amendment:

- §63.1343 – The revised PM emission limit during normal operation (0.07 lb/ton of clinker) was included in the permit. During startup and shutdown the facility must meet the requirements of §63.1348(b)(9).

Recommendation

A draft of the amended permit and the review memo was submitted to the facility on June 10, 2013 for their comments. The facility provided their comments on July 25, 2013. The comments were evaluated by the Department and the changes to the permit were made to reflect the comments. The following summary changes were made to the Site Level:

- §63.4(b) the language regarding fragmentation was revised to reflect the current language in the CFR.
- §63.6(e) is not applicable (see §63.1348(d). The operations and maintenance plan must address periods of startup and shutdown. See also §63.1347(a)(1). Paragraph (f)(1) regarding non opacity emission standards is also not applicable. The compliance obligations are specified in Subpart LLL per Table 1 to Subpart LLL. Paragraph (h) is not applicable because the facility is not subject to opacity limits in Subpart LLL or Subpart ZZZZ.
- §63.7, §63.8, and §63.9 the words “as applicable” were added for clarification.
- §63.10(b)(2)(i-ii) are not applicable based on §63.1355(g) and (h); (iii) was revised to match the current regulation by adding “and monitoring equipment”; (iv – v) are not applicable based on Table 1 to Subpart L and Table 8 to Subpart ZZZZ
- §63.10(d)(5) was revised to indicate that the owner or operator of an affected source shall comply with the recordkeeping and reporting requirements contained in 40 CFR 63.10, as applicable. [See Table 1 to Subpart LLL and Table 8 to Subpart ZZZZ].
- §63.1353(b)(3) is not applicable because the facility is an area source and not subject to opacity requirements in Subpart LLL.
- §63.1354(b)(2),(b)(7), and (b)(9)(iii) are not applicable because the facility is not subject to opacity limits in Subpart LLL and the facility does not use activated carbon injection to control D/F to below the emission rate based on several tests that have demonstrated compliance with the D/F limit without any control.
- §63.1341 the definition for enclosed storage pile and inactive clinker pile were removed because they do not pertain to this facility. A space was added between the definitions for Feed and Finish Mill to make the definitions easier to read.

- §63.1348(a)(2), (a)(3)(iii-iv),(a)(6), (b)(3), (b)(5), and (b)(8) are not applicable because the facility is not subject to opacity limits in Subpart LLL, the facility does not use activated carbon injection to control D/F and the facility is an area source which is not subject to HCl limits in Subpart LLL.
- §63.1349(b)(2), (b)(3)(v-vi), (b)(6), and (b)(8) are not applicable because the facility is not subject to opacity limits in Subpart LLL, the facility does not use activated carbon injection to control D/F and the facility is an area source which is not subject to HCl limits in Subpart LLL.
- §63.1350(f), (h), (l), and (m)(9) are not applicable because the facility is not subject to opacity limits in Subpart LLL, the facility does not use activated carbon injection to control D/F and the facility is an area source which is not subject to HCl limits in Subpart LLL. Paragraph (i)(3)((i-vi) were corrected by spelling out the words less than or equal to since the software that is used to generate the permit does not support the \leq symbol.

The following summary changes were made to the Source Level requirements for Sources 101 and 121 for the kilns:

- §145.143(b)(2)(ii-iii) are not applicable because the NO_x emissions limit for long wet-process kilns is specified in (b)(2)(i).
- §63.1343(b)(1) refers to Table 1. In Table 1 the regulation has a typographical error referencing §63.1346(g) which should be §63.1346(f) which was corrected during this amendment. Paragraph (c) is not applicable to this facility because they do not have any open clinker storage piles. Paragraph (d) references Table 2. However, in the current version of the CFR, the Table was not included. A reference to the Federal Register was included (See 76 Federal Register 2832 (January 18, 2011)).
- §63.1346(c-e) are not applicable because the facility does not use activated carbon injection to control D/F.

The following summary changes were made to the Source Level requirements for Sources 105 and 122 for the Clinker Coolers:

- §63.1343(b)(1) refers to Table 1. The portion of Table 1 pertaining to the Clinker Cooler particulate matter emission limits was included however; a typographical error referencing the kiln rather than the clinker cooler was corrected with this amendment.

The following summary changes were made to the Source Level requirements for Source 140 for the emergency power generator:

- §63.6625(f) and (h) were revised to match the current regulation from the January 30, 2013 amendment.
- §63.6660(b) refers to §63.10(b)(1) and keeping records for five years. However, Table 8 to Subpart ZZZZ lists an exception as follows, "Except that the most recent 2 years of data do not have to be retained on site". This notation was added to paragraph (b). Paragraph (c) was revised to match the current regulation from the January 30, 2013 amendment.
- §63.6640(e) was revised to only include the first sentence since the rest of the paragraph does not apply. This condition now states, "You must also report each instance in which you did not meet the requirements in Table 8 of this subpart that apply to you."
- §63.6650(h) was included in the draft of the amendment but was removed in the final amendment as it is not applicable as indicated above (facility does not operate generator contractually for more than 15 hours. The comments to the draft also pointed out that paragraphs

(a-e) and (g) are not applicable for the same reasons mentioned earlier in this memo. Paragraph (f) was inadvertently omitted from the previous permit and was included in this amendment. The compliance report for Subpart ZZZZ can be included with the semiannual monitoring report that is included in Section B of the permit.

- §63.6603 refers to Table 2d which was included in the condition but inadvertently omitted the words “and replace as necessary” to Item 4(b) of Table 2d. This wording was added to the current permit during this amendment. The footnote refers to the option of utilization of an oil analysis program as described in §63.6625(i) or (j). Because the engine is a diesel engine, the reference to paragraph (j) was not included in the draft. The facility comment reflected that the reference should be included to match the language in the regulation. Therefore, the reference as written in the regulation was included in the final amended permit.
- §63.6640(b) was added to the final amended permit. The notation that paragraph (c-d) are not applicable was also added to the final permit.
- §63.6695(a) was revised to match the language in the current regulation
- §63.6665 brackets were added to the condition to indicate reference to the General Provisions.

The facility requested that the emission restriction summary of the permit (Section F) be revised for both the kilns to reflect the unit notation of lbs/MM tons clinker for the NOx emission limit. This unit is not supported by the AIMS software. Therefore, the lbs/ton reference was changed to lbs and in the description field the notation of lbs/MM tons clinker under normal operation was included in the permit. The facility also requested that the pollutant reference of propane be changed to THC. The THC reference is not supported by the AIMS software so the description field was revised to reflect THC measured as propane under normal operation. The miscellaneous section of the permit was revised to more accurately reflect the revisions to Subpart LLL. The last issue was the formulas in Subpart LLL. Because the formulas are not supported by the AIMS software, they were omitted from the permit. A notation to each of the formulas was made in the amendment to reference the location of each respective formula. For example, (Formula for Equation 1 omitted...refer to regulation for exact formula notation).

Issuance of the Administrative Amendment is recommended with the appropriate conditions in the permit as identified above.

cc: Larry Vogel – New Castle AQ District Supervisor