MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

Statement of Basis

Preliminary Determination/Decision

for
Renewal of

FOP Number: 11800001

For:

Mitsubishi Cement Corporation

Facility:

Cushenbury Plant

Facility Address:

5808 Highway 18
Lucerne Valley, CA 92356

Document Date: **May 4, 2020**
Submittal date to EPA/CARB for review: **May 4, 2020**
EPA/CARB 45-day Commenting Period ended: **June 18, 2020**
Public Notice Posted: **May 8, 2020**
Public Commenting Period ended: **June 8, 2020**
Permit Issue date: On or about **June 18, 2020**

Permitting Engineer:
Sheri Haggard

A. FACILITY IDENTIFYING INFORMATION:

Owner/Company Name:	MITSUBISHI CEMENT CORPORATION
Owner Mailing Address:	MITSUBISHI CEMENT CORPORATION 5808 Highway 18, Lucerne Valley, CA 92356
Facility Names:	CUSHENBURY PLANT
Facility Location:	5808 State Highway 18, Lucerne Valley, CA 92356
Mailing Address:	MITSUBISHI CEMENT CORPORATION 5808 State Highway 18 Lucerne Valley, CA 92356
MDAQMD Federal Operating Permit Number:	11800001
MDAQMD Company Number:	1180
MDAQMD Facility Number:	0001
Responsible Official: Title: Phone Number:	Austin Marshall Vice President and Plant Manager 760-248-7373
Facility "Site" Contacts: Phone Number:	Mr. David M. Rib Environmental Manager 760-248-7373 (extension 5184)
Facility "Off Site" Contacts: Phone Number:	None
Nature of Business:	Portland Cement Manufacturing
SIC/NAICS Code:	3241/327310 - Cement Manufacturing
Facility Coordinates:	UTM (km) 489E / 3863N (34.354333/-116.854429)

B. BACKGROUND:

The Federal Clean Air Act Amendments of 1990 established a nation-wide permit to operate program commonly known as "Title V". The MDAQMD adopted Regulation XII [Rules 1200 - 1210] and Rule 221 - *Federal Operating Permit Requirement*; [Version in SIP = Current, 40 CFR 52.220(c)(216)(i)(A)(2) - 02/05/96 61 FR 4217], to implement both the Federal Operating Permit and Acid Rain Permit programs locally and have received Final Program Approval from EPA on March 6, 1996.

This facility (Mitsubishi Cement Corporation, hereafter MCC) is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR), and MDAQMD Regulation XII, *Federal Operating Permits*. MCC is defined as a federal Major Facility pursuant to District Rule 1201 – *Federal Operating Permit Definition,* as this facility has a Potential to Emit (PTE) greater than the Major Facility thresholds for a facility located within the District where it is designated as Federal Ozone Attainment or Unclassified.

Pursuant to Regulation XII, *Federal Operating Permits*, the District has reviewed the terms and conditions of this Federal Operating Permit and determined that they are still valid and correct. This review included an analysis of federal, state, and local applicability determinations for all sources, including those that have been modified or permitted since the issuance of the initial Federal Operating Permit. The review also included an assessment of all monitoring in the permit for sufficiency to determine compliance. This *Statement of Legal and Factual Basis,* pursuant to Rule 1203(B)(1)(a)(i), is intended to assess the adequacy of the proposed Title V Permit renewal and explain the District's basis in composing the proposed Title V Permit renewal.

In the MDAQMD, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. State and District applicable requirements are designated as such.

Page 2 of the Federal Operating Permit represents a complete revision history list for this facility. The purpose of this action is to renew MCC's Federal Operating Permit.

C. DESCRIPTION OF FACILITY:

MCC's – Crushenbury Plant is located in Lucerne Valley and is a Portland Cement manufacturing facility with a preheater Precalciner kiln located in Lucerne Valley, which includes the mining and processing of limestone, excavation, conveying, calcining, crushing, screening, storage, and transporting of materials including their primary product, cement. The hourly throughput is approximately 325-tons/hour feed. The preheater has four stages, and the Precalciner consumes about 60% of the total fuel used in the kiln. The kiln currently fires coal, tires, woodchips, biosolids (dewatered sewage sludge) on an occasional basis, and natural gas as a back-up fuel. The raw mill is in-line with the kiln. This is an existing kiln, and there is no raw material dryer at this facility. The kiln does not waste cement kiln dust (CKD) at this time. Currently the kiln has the following raw material sources: Cushenbury mine for limestone and

silica, the Silver Lake mine in Baker, CA, for iron from magnetite, and mines in Australia and Malaysia for alumina and bauxite. Other raw material sources are used as economics change. Clinker is stored in permitted storage enclosures.

MCC originally applied for a Title V permit on March 4, 1997, and has held a Title V permit concurrently since. MCC submitted an application for this current Title V renewal on August 7, 2019 pursuant to District Rule 1202, and it was submitted within six months of the current Title V permit expiring. MCC is defined as a federal Major Facility, subject to the Title V Program requirements, pursuant to District Rule 1201 – *Federal Operating Permit Definitions*, as this facility has a Potential to Emit (PTE) greater than the Major Source Thresholds for the following pollutants for a facility located within the Federal Ozone Non-attainment Area: Volatile Organic Compounds (VOC), Particulate Matter of 10 microns or less, (PM_{10}), Carbon Monoxide (CO), Oxides of Nitrogen (NO_X), Sulfur Dioxide (SO_2), and Combined Hazardous Air Pollutants (HAP). MCC is currently exempt from 40 CFR 52.21 pursuant to 52.21(i)(1) until PSD major/significant modification incurs because the construction of this facility was commenced before 8/7/1977. MCC is also defined as a major source of greenhouse gas emissions (GHG) and is subject to the Mandatory Greenhouse Gas Reporting requirements of 40 CFR 98. MCC conducts activities that are regulated by 40 CFR 82 – Protection of Stratospheric Ozone.

D. CHANGES MADE TO THE FEDERAL OPERATING PERMIT AS PART OF THE RENEWAL:

GENERAL UPDATES

● Updated the table of contents to correctly identify corresponding page numbers, and updated the appendices in terms of designation.

PART I: INTRODUCTORY INFORMATION

This section of the Federal Operating Permit contains general information about the MCC facility, including facility identifying information (section A), a description of the facility (section B), and a description of the facility's equipment (section C).

Changes made to this section of the FOP:

● Part I, Section A, the name and phone number of the Responsible Official was updated to current. The facility coordinates were updated to include decimal degrees.

PART II: FACILITYWIDE APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains requirements applicable to the entire facility and equipment (section A), facility-wide monitoring, recordkeeping, and reporting requirements (section B), and facility-wide compliance conditions (section C).

Changes made to this section of the FOP:

● Part II, Section A.1 was updated to match the District Rule 201 and 203 language.
● Part II, Section A.27 was added to include the requirements of District Rule 444 – Open Outdoor Fires.
● Part II, Section A.28 was updated with the correct language from District Rule 1104 – Organic Solvent Degreasing, which was amended on 4/23/18 and has SIP approval pending.
● Part II, Section A.29 was updated to reflect the most recent version of District Rule 1113 – Architectural Coatings which was amended on 04/23/12 that is currently approved in the SIP.
● Part II, Section A.30 was updated to reflect the most recent version of District Rule 1114 – Wood Products Coating Operations which was amended on 01/22/18 that has SIP approval pending.
● Part II, Section A.31 was updated to reflect the most recent version of District Rule 1115 – Metal Parts & Products Coating Operations which was amended on 01/22/18 that has SIP approval pending.
● Part II, Section A.32 was added to reflect the requirements of District Rule 1160 – Internal Combustion Engines which was amended on 01/22/18 that has SIP approval pending.
● Part II, Section A.33 was updated to reflect the most recent requirements of District Rule 1161 – Portland Cement Kilns which was amended on 01/22/18 that has SIP approval pending.
● Part II, Section A.34 was just reordered to maintain sequence of rule applicability.
● Part II, Section A.37 was updated to include federal and district citations.
● Part II, Section B.4 was updated to clarify the reporting period of the Compliance Certification.
● Part II, Section B.5 was updated to clarify the name of the "Monitoring Report".
● Part II, Section B.8 was added to include the application deadlines of the Title V Permit renewal process to ensure timely submissions and renewals.
● Part II, Section C.10 was corrected to reference the correct local rule for Greenhouse Gas Provisions of FOPs which is 1211, not 3011.

PART III: EQUIPMENT SPECIFIC APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains equipment-specific applicable requirements including emission limitations, monitoring and recordkeeping, reporting and testing, and compliance plans.

Changes made to this section of the FOP:

● PART III, Section A.1, <u>PRIMARY AND SECONDARY CRUSHING SYSTEM – MDAQMD PERMIT; B001009:</u>
    ○ Added capacities to equipment description details and corrected typo.
● PART III, Section A.2, <u>BAGHOUSE - MDAQMD PERMIT C001013</u>:
    ○ Corrected the logging retention requirement from two to five years.

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.5, BAGHOUSE - MDAQMD PERMIT C001016:
○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.7, BAGHOUSE - MDAQMD PERMIT C001335:
○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.8, BAGHOUSE - MDAQMD PERMIT C001336:
○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.9, BAGHOUSE - MDAQMD PERMIT C001337:
○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.16, BAGHOUSE - MDAQMD PERMIT C001333:
○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.27, CLINKER COOLING EXHAUST DUST RECLAIM SYSTEM TRANSFER - MDAQMD PERMIT B002138:
○ Corrected the MCC equipment identifier numbers on the referenced permits in condition 2.

● PART III, Section A.29, BAGHOUSE - MDAQMD PERMIT C001027:
○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.35, BAGHOUSE (4-DC-45) - MDAQMD PERMIT C000999:
○ Updated the referenced clinker transfer systems that this unit controls, by adding permit number T002096. This appears to be an oversight, as this unit was listed on the local permit C000999.

● PART III, Section A.36, CLINKER PRYO PROCESSING KILN - MDAQMD PERMIT B001025:
○ Updated the equipment that this equipment vents to, including the MCC equipment number identification information. This is merely an administrative update to correct identifiers. All associated emissions have been addressed in previous permitting actions.

● PART III, Section A.36B, DUST COLLECTOR FOR LIME INJECTION STORAGE SILO (4-DC-55) - MDAQMD PERMIT C011737:
○ Updated the MCC equipment number identification information. Corrected typo in condition 3, changed “or” to “to”.

● PART III, Section A.37, BAGHOUSE - MDAQMD PERMIT C000984:
○ Corrected typo in condition 3, changed “or” to “to”.

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.37A, DUST COLLECTOR FOR CLINKER BREAKER FUGITIVE DUST - MDAQMD PERMIT C012320:

○ Corrected typo in condition 3, changed "or" to "to".

● PART III, Section A.38, BAGHOUSE - MDAQMD PERMIT C001338:

○ Corrected typo in condition 3, changed "or" to "to".

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.42, CLINKER STORAGE DOME - MDAQMD PERMIT B009582:

○ Corrected capacity of the air compressor on the domes and the scfm.

● PART III, Section A.45, DUST COLLECTOR FOR CLINKER DOME (4-DC-53) - MDAQMD PERMIT C009587:

○ Added condition to comply with 40 CFR 63, Subpart LLL to be consistent with the local district permit operating conditions.

● PART III, Section A.48, BAGHOUSE - MDAQMD PERMIT C001029:

○ Updated the equipment that this equipment vents to. This is merely an administrative update to correct identifiers. All associated emissions have been addressed in previous permitting actions.

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.50B, DUST COLLECTOR FOR DUST SHUTTLING SYTEM (5-DC-19) - MDAQMD PERMIT C012290:

○ Corrected typo in condition 3, changed "or" to "to".

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.55, GYPSUM UNLOADING - MDAQMD PERMIT B001859:

○ Updated the equipment that this equipment vents to. This is merely an administrative update to correct identifiers. All associated emissions have been addressed in previous permitting actions.

● PART III, Section A.56, BAGHOUSE FOR ADMIX STORAGE (-DC-23) - MDAQMD PERMIT C003209:

○ Updated the equipment that this equipment vents to in condition 6. This is merely an administrative update to correct identifiers. All associated emissions have been addressed in previous permitting actions.

● PART III, Section A.68A, DUST COLLECTOR FOR FINISH MILL 1 (5-DC-8) - MDAQMD PERMIT; C012293:

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.68B, DUST COLLECTOR FOR FINISH MILL 1 (5-DC-51) - MDAQMD PERMIT; C012739:

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.68C, DUST COLLECTOR FOR FINISH MILL 2 (5-DC-52) - MDAQMD PERMIT; C012740:

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.74, FINISH MILL NO. 2 SYSTEM (5-FM-2) - MDAQMD PERMIT; B001036:

○ Updated condition 3 to add reference that this unit is not operated without the control under C012740 (5-DC-52) to be consistent with local permit.

● PART III, Section A.81, BAGHOUSE - MDAQMD PERMIT C000972:

○ Added condition to comply with 40 CFR 63, Subpart LLL to be consistent with the local district permit operating conditions.

● PART III, Section A.103, SOUTH CEMENT LOADOUT - RAIL - MDAQMD PERMIT; B000991:

○ Updated condition 2 to add reference that this unit is not operated without the control under C009656 (6-DC-27) to be consistent with local permit.

● PART III, Section A.105, DUST COLLECTOR (6-DC-27) - MDAQMD PERMIT C009656:

○ Deleted condition 10 as it was duplicative of condition 5.

● PART III, Section A.113, CEMENT LOADOUT TRANSFER - MDAQMD PERMIT B001865:

○ Corrected typo in condition 2 regarding the MCC equipment identification number.

● PART III, Section A.115, BAGHOUSE FOR TYPE III LOADOUT (6-DC-26) - MDAQMD PERMIT; C003236:

○ Updated condition 2 to remove erroneous reference to log items from condition 1 which does not require an items to be logged? Proposed condition is now stand alone and requires proper logging of repairs and maintenance.

○ Removed condition requiring initial Method 9 requirement, as this initial opacity test has been completed.

○ Added condition 9 to maintain consistency with the local District permit.

● PART III, Section A.115A, DUST COLLECTOR FOR BLOCK LOADOUT (6-DC-28) - MDAQMD PERMIT; C012293:

○ Corrected typo in the MCC equipment identification number on the permit description.

○ Updated the MCC equipment number identification information. Corrected typo in condition 3, changed “or” to “to”.

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.116, BAGHOUSE - MDAQMD PERMIT; C001467:

○ Added condition 5 to maintain consistency with the local District permit.

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.118, BAGHOUSE - MDAQMD PERMIT; C001002:

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.119, BAGHOUSE - MDAQMD PERMIT; C001005:

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.121, BAGHOUSE - MDAQMD PERMIT; C001003:

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.122, BAGHOUSE - MDAQMD PERMIT; C001006:

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.123, BAGHOUSE - MDAQMD PERMIT; C001343:

○ Deleted that this unit is equipped with an air-lock system, as this unit is not equipped, nor was ever equipped with an air-lock system, so this is a typo correction. Removal of this from the permit does not change the potential to emit associated with this unit.

● PART III, Section A.138, DIESEL IC ENGINE, PORTABLE WELDER (725-051) - MDAQMD PERMIT; B009462:

○ Corrected the drop dead dates from the Portable ATCM, as this facility is defined as a "small fleet", not a "large fleet". The changing of these dates does not change the emissions associated with this equipment.

● PART III, Section A.139, DIESEL IC ENGINE, PORTABLE WELDER (725-052) – MDAQMD PERMIT; B009929:

○ Corrected the rpm value and the model number of the welder.

○ Corrected the drop dead dates from the Portable ATCM, as this facility is defined as a "small fleet", not a "large fleet". The changing of these dates does not change the emissions associated with this equipment.

● PART III, Section A.141, DIESEL IC ENGINE, PORTABLE, LOW USE WELDER (725-052) – MDAQMD PERMIT; B009929:

○ Corrected model number of the welder.

● PART III, Section A.147A, DIESEL IC ENGINE, EMERGENCY/DRP GENERATOR – MDAQMD PERMIT; E010971:

○ Added the make, model, serial number, and rating of the generator to the equipment description.

● PART III, Section A.151, WHITE SAND SILOS & BAGGING STATION – MDAQMD PERMIT; T004299:

○ Updated the associated control equipment for which this equipment vents to. This is merely an administrative update to correct identifiers. All associated emissions have been addressed in previous permitting actions.

PART IV: STANDARD FEDERAL OPERATING PERMIT CONDITIONS

This section of the Federal Operating Permit contains standard federal operating permit conditions.

Changes made to this section of the FOP:

● No changes were made to this section other than minor formatting changes.

PART V: OPERATIONAL FLEXIBILITY

This section of the Federal Operating Permit contains information on Off Permit Changes.

Changes made to this section of the FOP:

● No changes were made to this section other than minor formatting changes.

PART VI: PERMIT SHIELD

Changes made to this section of the FOP:

● Updated the section for 40 CFR 63, Subpart ZZZZ for Permit Units E012736 and E012737 by stating these units are “not” classified as emergency under these regulations. The original language omitted the word “not” so this is a typo correction. Current conditions reflect this designation.

PART VII: CONVENTIONS, ABREVIATIONS, DEFINITIONS

Changes made to this section of the FOP:

● No changes were made to this section.

APPENDICES

Changes made to this section of the FOP:

● Appendix A
    ○ Updated the Emission Unit List and Applicable Requirement Category Table to reflect permit unit C000998 as cancelled.
    ○ Corrected the Emission Unit List and Applicable Requirement Category Table to include permit unit C000988, as it inadvertently got deleted.
    ○ Corrected the Emission Unit List and Applicable Requirement Category Table to reflect permit unit C012290 is subject to section C5 of Appendix C, not C6. This is a typo correction.
    ○ Corrected the Emission Unit List and Applicable Requirement Category Table to reflect the correct MCC equipment unit identifier and the associated section number of the FOP. This is a typo correction.
● Appendix B

○ Updated the Rule/Regulation Applicability and Citations to incorporate rule amendments and SIP approvals that have occurred since past renewal. Additional rule citations and SIP authorities were included to address any SIP gap.

- Appendix C
  - ○ Section C5, corrected a typo, should be "(3)" in the citation, not a "(iii)".
  - ○Section C6, deleted a 7 from the citation; it is a typo.
  - ○Section C9, corrected language from 63.1349 of 40 CFR for subsection (d); and, corrected typo of referenced table from "3" to "1".

E. RULE APPLICABILITY

District Rules

Rule 201/203 – *Permits to Construct/Permit to Operate*. Any equipment which may cause the issuance of air contaminants must obtain authorization for such construction from the Air Pollution Control Officer. MCC is in compliance with this rule as they have appropriately applied for a District permit for all new equipment and maintains District permits for all residing equipment per Part II, section A.1 and A.2 of their FOP.

Rule 204 – *Permit Conditions*. To assure compliance with all applicable regulations, the Air Pollution Control Officer (Executive Director) may impose written conditions on any permit. MCC complies with all applicable regulations per Part II, section A.3 and A.4 of their FOP.

Rule 206 – *Posting of Permit to Operate*. Equipment shall not operate unless the entire permit is affixed upon the equipment or kept at a location for which it is issued and will be made available to the District upon request. MCC complies with this regulation per Part II, section A.5 of their FOP.

Rule 207 – *Altering or Falsifying of Permit.* A person shall not willfully deface, alter, forge, or falsify any issued permit. MCC complies with this regulation per Part II, section A.6 of their FOP.

Rule 209 – *Transfer and Voiding of Permits*. MCC shall not transfer, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another. When equipment which has been granted a permit is altered, changes location, or no longer will be operated, the permit shall become void. MCC complies with this regulation per Part II, section A.7 of their FOP.

Rule 210 – *Applications*. MCC eventually provided all the required information to correctly address the renewal pursuant to this rule, although there were instances in which additional information were required, in which the thirty (30) day clock was restarted.

Rule 212 – *Standards for Approving Permits*. This rule establishes baseline criteria for approving permits by the District for certain projects. In accordance with these criteria, the proposed modifications and application does not cause issuance of air contaminants in violation of Sections 41700 or 41701 of the State Health and Safety code.

Rule 217 – *Provisions for Sampling and Testing Facilitie*s. This rule requires the applicant to provide and maintain requirements for sampling and testing. MCC is in compliance with this rule per Part II, section A.8 of their FOP.

Rule 218 – *Stack Monitoring*. This rule requires facilities to provide, properly install, and maintain stack monitoring systems. MCC is in compliance with this rule per Part II, section A.9 of their FOP.

Rule 219 – *Equipment not Requiring a Permit*. This rule exempts certain equipment from District Permit. MCC is in compliance with this rule per Part II, section A.10.

Rule 221 – *Federal Operating Permit Requirement.* MCC is in compliance with this rule, as they currently hold and maintain a Federal Operating Permit.

Rule 301/312 – *Permit Fees/Fees for Federal Operating Permits*. MCC's annual permit fees are due by the applicable amounts.

Rule 401 – *Visible Emissions*. This rule limits visible emissions opacity to less than 20 percent (or Ringlemann No. 1). In normal operating mode, visible emissions are not expected to exceed 20 percent opacity. MCC has specific operating conditions that enforce compliance with this rule, specifically Part II, section A.14.

Rule 403 – *Fugitive Dust*. This rule prohibits fugitive dust beyond the property line of any emission source. MCC has specific operating conditions to ensure compliance with this condition, specifically Part II, section A.16.

Rule 403.2 – *Fugitive Dust Control for the Mojave Desert Planning Area*. This rule ensures that the NAAQS for PM10 will not be exceeded due to anthropogenic sources of fugitive dust with the Mojave Desert Planning Area. MCC is in compliance with this rule per Part II, section A.17.

Rule 404 – *Particulate Matter Concentration*. MCC shall not discharge into the atmosphere from this facility, particulate matter (PM) except liquid sulfur compounds, in excess of the concentration at standard conditions, shown in Rule 404, Table 404 (a).
(a) Where the volume discharged is between figures listed in the table the exact concentration permitted to be discharged shall be determined by linear interpolation.
(b) This condition shall not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines.
(c) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.
MCC adheres to this rule per Part II, section A.18 of their FOP.

Rule 405 – *Solid Particulate Matter, Weight*. MCC shall not discharge into the atmosphere from this facility, solid PM including lead and lead compounds in excess of the rate shown in Rule 405, Table 405(a):
(a) Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.

(b) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.
MCC adheres to this rule per Part II, section A.19 of their FOP.

Rule 406 – *Specific Contaminants*. This rule limits single source of emissions of sulfur compounds. MCC meets this requirement by complying with operating condition listed in Part II, section A.20 of their FOP.

Rule 407 – Liquid and Gaseous Air Contaminants. This rule limits CO emissions from facilities. MCC meets this requirement by complying with operating condition listed in Part II, section A.21 of their FOP.

Rule 408 – *Circumvention*. This rule prohibits hidden or secondary rule violations. The proposed renewal as described is not expected to violate Rule 408. MCC meets this requirement by complying with operating condition listed in Part II, section A.22 of their FOP.

Rule 409 – *Combustion Contaminants*. This rule limits the emissions of combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO_2) at standard conditions averaged over a minimum of 25 consecutive minutes. MCC meets this requirement by complying with operating condition listed in Part II, section A.23 of their FOP.

Rule 430 – *Breakdown Provisions*. Any Breakdown which results in a violation to any rule or regulation as defined by Rule 430 shall be properly addressed pursuant to this rule. MCC meets this requirement by complying with operating condition listed in Part II, section A.24 of their FOP.

Rule 431 – *Sulfur Content of Fuels*. MCC is limited to use of the following quality fuels for fuel types specified elsewhere in this permit: PUC quality natural gas fuel - sulfur compounds shall not exceed 800 parts per million (ppm) calculated as hydrogen sulfide at standard conditions; diesel fuel - sulfur content shall not exceed 0.5 percent by weight. Compliance with Rule 431 fuel sulfur limits is assumed for PUC quality natural gas fuel and CARB certified diesel fuel. Records shall be kept on-site and available for review by District, state, or federal personnel at any time. The sulfur content of non-CARB certified diesel fuel shall be determined by use of American Society for Testing and Materials (ASTM) method D 2622-82 or ASTM method D 2880-71, or equivalent. MCC is required to adhere to this rule per Part II, section A.15 and A.25.

Rule 442 – *Usage of Solvents*. This rule reduces VOC emissions from VOC containing materials or equipment that is not subject to any other rule in Regulation XI. MCC meets this requirement by complying with operating condition listed in Part II, section A.26 of their FOP.

Rule 444 – *Open Outdoor Fires*. The purpose of this rule is to ensure that the ambient air quality is not significantly degraded due to Open Outdoor Fires; and, to apply the District Smoke Management Program to specified applications while minimizing smoke impacts to the public. MCC is required to meet the requirements of this rule pursuant to Part II, section A.27 of their FOP.

Rule 900 – *Standards of Performance for New Stationary Sources (NSPS)*. Rule 900 adopts all applicable provisions regarding standards of performance for new stationary sources as set forth in 40 CFR 60. Four NSPSs apply to MCC: 40 CFR 60, Subpart A, Y, O, and IIII. MCC complies with these NSPSs per the specific requirements listed under the corresponding sections under Appendix C:

- 40 CFR 60, Subpart A – *NSPS General Provisions*: Appendix C, Sections C1 and C2.
- 40 CFR 60, Subpart Y – *NSPS for Coal Preparation Plants and Processing Plants*: Appendix C, Section C1.
- 40 CFR 60, Subpart OOO – *NSPS for Nonmetallic Mineral Processing Plants*: Appendix C, Section C2.
- 40 CFR 60, Subpart IIII – *NSPS for Stationary Compression Ignition Internal Combustion Engines*: Appendix C, Section C13.

Rule 1000 – *National Emission Standards for Hazardous Air Pollutants (NESHAP)*. Rule 1000 adopts all applicable provisions regarding standards of performance for new stationary sources as set forth in 40 CFR 61. MCC complies with 40 CFR 61, Subpart M – *NESHAP for Asbestos* per conditions in Part II, section C.7, C.8, and C.9.

Rule 1104 – *Organic Solvent Degreasing Operations*. This rule limits the emission of VOCs from wipe cleaning and degreasing operations using organic solvents. MCC meets this requirement by complying with operating condition listed in Part II, section A.28 of their FOP.

Rule 1113 – *Architectural Coatings*. This rule limits the quantity of VOC in Architectural Coatings. MCC meets the requirements of this rule by complying with operating condition listed in Part II, section A.29 of their FOP.

Rule 1114 – *Wood Products Coating Operations*. This rule limits the emission of Volatile Organic Compounds from Wood Products Coating Application Operations. MCC is required to comply with the requirements of this rule pursuant to Part II, section A.30 of their FOP.

Rule 1115 – *Metal Parts and Products Coatings*. This rule limits the emission of VOC from coatings associated with Metal Parts and Products. MCC meets the requirements of this rule by complying with operating condition listed in Part II, section A.31 of their FOP.

Rule 1160 – *Internal Combustion Engines*. This rule limits the emissions of NO_X, CO and VOC from Internal Combustion Engines that are not subject to District Rule 1160.1 – *Internal Combustion Engines in Agricultural Operations*. MCC is required to comply with the requirements of this rule pursuant to Part II, section A.32 of their FOP.

Rule 1161 – *Portland Cement Kilns*. This rule limits emissions of oxides of nitrogen (NO_X) resulting from the operation of existing Portland cement kilns. MCC meets the requirements of this rule by complying with operating condition listed in Part II, section A.33 their FOP.

Regulation X – *National Emission Standards for Hazardous Air Pollutants*. Pursuant to Regulation X, MCC is required to comply with all applicable ATCMs.

Regulation XII – *Federal Operating Permits.* This regulation contains requirements for sources which must have a FOP. MCC currently has a FOP and is expected to comply with all applicable rules and regulations. Additionally, this is a requirement of their FOP under Part II, section A.34.

Rule 1201 – *Federal Operating Permit Definitions.* MCC is defined as a federal Major Facility pursuant to this rule.

Rule 1202 – *Applications*. MCC properly applied for a renewal to their Title V permit pursuant to this rule. The application was timely and complete.

Rule 1203 – *Federal Operating Permits*. This rule outlines the permit term, issuance, restrictions, content, operational flexibility, compliance certification, permit shield, and violations of Federal Operating Permits. The proposed Title V permit renewal contains all applicable requirements for all relevant permit units, non-permitted and fugitive emissions. The proposed permit contains emission limitations and/or standards, including operational limitations, which assures compliance with the applicable requirements and a reference to the origin and authority of each term or condition. The proposed Title V permit contains the monitoring, reporting, and record keeping requirements, as applicable, to demonstrate compliance with the applicable requirements. MCC complies with this rule per Part II, Part III, Part IV and V of their FOP.

Rule 1205 – *Modifications of Federal Operating Permits*. This action to MCC's FOP does not constitute a modification; therefore, this rule is not subject to this action.

Rule 1206 – *Reopening, Reissuance and Termination of Federal Operating Permits*. This action to MCC's FOP does not constitute a Reopening, Reissuance or Termination of Federal Operating Permits; therefore, this rule is not subject to this action.

Rule 1207 – *Notice and Comment*. This rule outlines the noticing requirements for Notice and Comment. MCC will properly notice their renewal pursuant to this rule.

Rule 1208 – *Certification*. MCC included a Certification of Responsible Official as required with the submitted application for the Renewal.

Rule 1211 – *Greenhouse Gas Provisions of Federal Operating Permits*. MCC is a Major GHG Facility pursuant to Rule 1211. MCC is required to submit GHG data with any application per Part II, section C.10.

Regulation XIII – *New Source Review.* This regulation sets forth requirements for the preconstruction review of all new or modified facilities. MCC is not a new facility nor is it currently a modified facility; therefore, this regulation does not apply.

Rule 1520 – *Control of Toxic Air Contaminants from Existing Sources*. This rule controls the emission of toxic air contaminants from existing source. MCC is expected to comply with this rule on a routine basis as part of the Districts Emissions Inventory and Hot Spots Inventory

programs. MCC is required to submit a comprehensive actual emissions inventory on an annual basis, and is required to update the actual toxic emissions on a triennial basis for routine toxics analysis and compliance with this rule. MCC is currently defined as an "Intermediate Priority" based on the facility's prioritization scores.

Regulation XVII – *Prevention of Significant Deterioration*
Please take notice that this regulation is not currently used within the MDAQMD because the USEPA has not delegated authority for the PSD Program to the MDAQMD at this time. However, per the language in the applicability procedures of 40 CFR 52.21 (a)(2)(i) and (ii), PSD applies to "any new major stationary source or the major modification of any existing major stationary source". MCC is not a new major stationary source and this action does not constitute a major modification; hence, this project (Title V renewal) is not subject to PSD.

Federal Regulations

40 CFR 60, Subpart A – *NSPS General Provisions.* MCC complies with this regulation per Appendix C, Sections C1 and C2.

40 CFR 60, Subpart Y – *NSPS for Coal Preparation Plants and Processing Plants*. MCC complies with this regulation per Appendix C, Section C1.

40 CFR 60, Subpart OOO – *NSPS for Nonmetallic Mineral Processing Plants*. MCC complies with this regulation per Appendix C, Section C2.

40 CFR 60, Subpart IIII – *NSPS for Stationary Compression Ignition Internal Combustion Engines*. MCC complies with this regulation per Appendix C, Section C12 for non-emergency engines.

40 CFR 61, Subpart M – *NESHAP for Asbestos*. MCC complies with 40 CFR 61, Subpart M – *NESHAP for Asbestos* per conditions in Part II, section C.7, C.8, and C.9

40 CFR 63, Subpart A – *NESHAP General Provisions*. MCC complies with this regulation per Appendix C, Sections C3 through C7.

40 CFR 63, Subpart LLL – *NESHAP for the Portland Cement Industry*. MCC complies with this regulation per Appendix C, Sections C3 through C7 and C9 through C10.

40 CFR 63, Subpart ZZZZ – *NESHAP for Stationary Reciprocating Internal Combustion Engines*. MCC complies with this regulation per Appendix C, Section C11 for emergency engines and Section C12 for non-emergency engines.

40 CFR 64, *Compliance Assurance Monitoring*. The Compliance Assurance Monitoring (CAM) rule (40 CFR 64) applies to each Pollutant Specific Emissions Unit (PSEU) when it is located at a Major Facility that is required to obtain Title V, Part 70 or 71 permit and it meets all of the

following criteria. "PSEU" means an emissions unit considered separately with respect to each regulated air pollutant.

The PSEU must:
a. Be subject to an emission limitation or standard [40 CFR 64; AND,
b. Use a control device to achieve compliance [40 CFR 64.2(a)(2)]; AND,
c. Have the **potential pre-control** emissions that exceed or are equivalent to the major source threshold. [40 CFR 64.2(a)(3)]

The MCC facility currently has two PSEU applicable to CAM. Please refer to the CAM PSEU Emission Unit Evaluation and Analysis on the following pages. The corresponding CAM plans can be found in Appendix B.

40 CFR 82, *Protection of Stratospheric Ozone*. MCC complies with this regulation per Appendix C, Section C13.

Mitsubishi Cement Corporation

Pollutant Specific Emission Unit Evaluation

District Permit	Process	Pollutant subject to Limitation or Standard	Uncontrolled PTE (tpy)	Uncontrolled PTE greater than 100% of Major Source Threshold	Unit uses a control device	CAM Applicable	Exempt from CAM	CAM Plan Required	CAM Specifics
B001009	Primary & Secondary Crushing System	PM10	389	Yes	Yes	Yes	No	Yes	Rule 401 Monitoring See FOP, Part II, Section A, Item 14
B001011	Crushing, Stockpiling, and Pre-Blending System	PM10	266	Yes	Yes	Yes	No	Yes	Rule 401 Monitoring See FOP, Part II, Section A, Item 14

Pollutant	Major Source Threshold (tons per year)
NOx	25
VOC	25
CO	100
PM10	100
SOx	100
Single HAP	10
Combination of HAP	25

CAM Stepwise Evaluation, Updated Jul. 30, 2019:

The following is a list of steps involved in evaluating CAM requirements for MCC emission units:

1) Define units to be evaluated for CAM applicability:
   - Make a current list of all B & T solid material handling units at the plant (including kiln, clinker cooler, raw mill, finish mills, other affected sources under NESHAP, coal mill, sand plant, and all other solid material handling equipment), and associated control devices.
   - Also list all other types of units at plant (per category list discussed below).
   - Identify inactive units, assumed to be exempt from CAM.

2) Check whether the unit has an emission limitation or standard and uses a control device to achieve compliance, in which case the unit is potentially subject to CAM:
   - For all B&T units, divide solid material handling (SMH) units into the following NSPS and NESHAP applicability groups and CAM status of these units is evaluated below (assume that all solid material handling units included in CAM table have emission standards and use a control device with the two exceptions as stated below under #4):
     - NSPS Y (coal mill)
     - NSPS OOO (sand plant)
     - NESHAP kiln
     - NESHAP clinker cooler
     - NESHAP raw mill and finish mills
     - NESHAP other affected sources
     - Other solid material handling units not subject to NSPS and NESHAP
   - For emergency generators (stationary), the CAM status of these units is evaluated below.
   - For other types of units (other than solid material handling and emergency generators), assume not subject to CAM because these units have low uncontrolled emissions:
     - Waste oil storage tanks and gasoline dispensing
     - Portable generators
     - Space heating (unpermitted)
     - Other units

3) Evaluate whether the SMH unit is exempt from CAM because the unit is subject to an NSPS or NESHAP that was promulgated after November 11, 1990-the following are exempt from CAM:
   - SMH units subject to NESHAP LLL (Portland Cement) are exempt from CAM
   - Emergency generators subject to NESHAP ZZZZ (RICE) are exempt from CAM
   - SMH units subject to NSPS Y and NSPS OOO are not exempt from CAM
   - Other SMH units not subject to either NSPS and NESHAP are not exempt from CAM

4) If an SMH unit is potentially subject to CAM based on #3 (i.e., not exempt, i.e. NSPS Y/OOO, non-NESHAP), compare the unit's uncontrolled emissions to the 100 ton/year PM major source threshold.

- Uncontrolled emissions are based on fugitive emissions of the B & T units, with 0% control (see CAM table on the following pages). For kiln, since no fugitive emissions, use 100X emissions (i.e. 99% control).
- For the primary & secondary crusher and the pre-blending system, these units are over 100 tons/year uncontrolled emissions and are subject to CAM.

5) For two SMH units that are subject to CAM, a CAM plan was prepared for each unit per the required format (see Appendix B)

B001009 - Primary & Secondary Crushing System

- Control devices: C001013

B001011 - Crushing, Stockpiling, and Pre-blending System

- Control devices: C001336, C001337, C001339, C001014, C001016, C001017, and C001335

Permit No.	Permit Description	Controlled Transfer Points	Unenclosed Transfer Points	Screens	Crushers	Material Type	Emission Factor (lb/ton)	PTE Throughput (tons/year)[1]	PTE Emissions (tons/yr)	Maximum Hourly Throughput (tons/hr)	Applicable Regulation	CAM Potentially Applicable	New unit since last Title V renewal?
B000975	Gypsum Unloading to Storage	2	0	0	0	Gypsum	2.7E-02	89,706	1	400	NESHAP LLL	--	--
B000983	Clinker Transfer and Inside Storage	2	0	0	0	Clinker	2.7E-02	557,280	8	250	NESHAP LLL	--	--
B000989	South Cement Loadout - Truck	1	0	0	0	Cement	1.4E-02	1,202,007	8	350	NESHAP LLL	--	--
B000991	South Cement Loadout - Rail	2	0	0	0	Cement	2.7E-02	1,370	0	200	NESHAP LLL	--	--
B000993	Unit No. 1 - Cement Packing	5	0	0	0	Cement	6.8E-02	536	0	40	NESHAP LLL	--	--
B001007	Railroad Car Coal Unload and Storage	2	0	0	0	Coal	2.7E-02	234,917	3	400	NSPS Y	--	--
B001009	Primary and Secondary Crushing System	3	5	1	2	Limestone	2.7E-01	3,415,775	458	1,975	--	Yes	--
B001010	Clay Delivery, Crushing, and Storage System	2	0	0	0	Red Bauxite	2.7E-02	97,298	1	732	--	--	--
B001011	Crushing, Stockpiling, and Pre-Blending System	7	0	2	1	Limestone	2.0E-01	3,415,775	338	786	--	Yes	--
B001012	Raw Additive Delivery to Storage	3	1	0	0	Raw Material Blend	5.5E-02	3,614,745	99	732	--	--	--
B001019	Raw Grinding and Blending	10	0	1	2	Raw Material Blen	3.0E-01	3,614,745	535	425	NESHAP LLL	--	--
B001032	Clinker Transfer to Storage	6	0	0	0	Clinker	8.2E-02	2,076,894	85	400	NESHAP LLL	--	--
B001033	Mill No. 4 - Finish (5-FM-4) System	5	0	1	1	Clinker	1.6E-01	1,102,601	86	130	NESHAP LLL	--	--
B001034	Mill No. 1 - Finish (5-FM-1) System	13	0	0	1	Clinker	2.5E-01	252,426	32	30	NESHAP LLL	--	--
B001035	Mill No. 3 - Finish (5-FM-3) System	8	0	0	1	Clinker	1.8E-01	262,800	24	30	NESHAP LLL	--	--
B001036	Finish Mill No. 2 System (5-FM-2)	10	0	1	1	Clinker	2.2E-01	963,600	108	110	NESHAP LLL	--	--
B001039	Coal Reclaim System	4	0	0	0	Coal	5.5E-02	234,917	6	335	NSPS Y	--	--
B001857	Blending Operation for Kiln Feed	8	0	0	0	Raw Material Blen	1.1E-01	3,614,745	198	496	NESHAP LLL	--	--
B001858	Gypsum Silo to Bin Storage	1	0	0	0	Gypsum	1.4E-02	0	0	50	NESHAP LLL	--	--
B001859	Gypsum Unloading	7	0	0	0	Gypsum	9.6E-02	15,243	1	300	--	--	--
B001864	North Cement Loadout - Truck	2	0	0	0	Cement	2.7E-02	1,152,932	16	350	NESHAP LLL	--	--
B001865	Cement Loadout Transfer	3	0	0	0	Cement	4.1E-02	2,355,450	48	500	NESHAP LLL	--	--
B001866	Unit No. 2 - Cement Packing	4	0	0	0	Cement	5.5E-02	536	0	40	NESHAP LLL	--	--
B001868	Mill No. 4 - Coal Grinding (7-CM-4)	3	0	0	1	Coal	1.1E-01	140,950	8	30	NSPS Y	--	--
B001871	Cement Truck Loadout No. 1 - Station	1	0	0	0	Cement	1.4E-02	3,687	0	100	NESHAP LLL	--	--
B001872	Cement Truck Loadout No. 2 - Station	1	0	0	0	Cement	1.4E-02	5,153	0	100	NESHAP LLL	--	--
B001979	Clay Dome Reclaim System	1	0	0	0	Red Bauxite	1.4E-02	0	0	100	--	--	--
B001983	Fly Ash Silo Transfer	1	0	0	0	Gypsum	1.4E-02	0	0	50	NESHAP LLL	--	--
B001984	Kiln Bypass System - Alkali Dust	1	0	0	0	Clinker	1.4E-02	0	0	25	NESHAP LLL	--	--
B001985	Unit No. 3 - Cement Packing	1	0	0	0	Cement	1.4E-02	0	0	40	NESHAP LLL	--	--
B001986	Auxiliary Coal Transport to Kiln	1	0	0	0	Coal	1.4E-02	23,492	0	30	NSPS Y	--	--
B002089	Cement Unload Equipment	2	0	0	0	Cement	2.7E-02	152,319	2	500	NESHAP LLL	--	--
B002109	Cement Truck Loadout No. 3 Station	1	0	0	0	Cement	1.4E-02	1,752,000	12	200	NESHAP LLL	--	--
B002137	Clinker Cooling & Transfer	3	0	0	0	Clinker	4.1E-02	2,190,000	45	250	NESHAP LLL	--	--
B002138	Clinker Cooling Exhaust Dust Reclaim System Transfer [2]	26	0	0	0	Clinker	3.6E-01	87,600	16	10	NESHAP LLL	--	--
B002405	Roller Press System	6	0	0	0	Clinker	8.2E-02	1,138,800	47	130	NESHAP LLL	--	--
B002784	Mill No. 3 - Coal Grinding (7-CM-3)	2	0	0	1	Coal	9.9E-02	140,950	7	30	NSPS Y	--	--
B004694	Biosolids handling system (does not operate)	-	-	-	-	-	-	--	--	-	--	--	--
B009582	Clinker storage dome	2	0	0	0	Clinker	2.7E-02	1,200,000	16	150	NESHAP LLL	--	--
B010041	Wood chip system [2]	20	0	1	1	Wood	3.6E-02	46,248	1	6	--	--	--
B010042	Bauxite unloading hopper [3]	1	0	0	0	Red Bauxite	1.8E-03	28,274	0	4	--	--	--
B010724	Tire chip system (not constructed yet)	8	0	0	0	Tires	-	--	--	-	--	--	--
B011738	Slurry lime injection	2	0	0	0	Lime	2.7E-02	15,000	0	100	--	--	--
B012291	Dust Shuttling System	7	0	0	0	Cement Kiln Dust	9.6E-02	157,500	8	35	NESHAP LLL	--	Yes
C012738	Activated Carbon System	0	1	0	0	Activated Carbon	1.4E-02	548	0	35	--	--	Yes
T000971	Fly Ash Truck Unload	1	0	0	0	Gypsum	1.4E-02	0	0	100	NESHAP LLL	--	--
T000985	South Cement Storage, Silos 19 & 21	1	0	0	0	Cement	1.4E-02	1,202,007	8	350	NESHAP LLL	--	--
T000987	North Cement Storage, Silo 20, 22 & H	1	0	0	0	Cement	1.4E-02	1,152,932	8	500	NESHAP LLL	--	--
T001030	Alkali Dust Truck Loadout System	1	0	0	0	Cement Kiln Dust	1.4E-02	0	0	30	NESHAP LLL	--	--
T001031	Clinker Storage to FM-4	1	0	0	0	Clinker	1.4E-02	1,102,601	8	300	NESHAP LLL	--	--
T001869	Cement Storage	1	0	0	0	Cement	1.4E-02	152,319	1	500	NESHAP LLL	--	--
T002090	Raw Mix Blending Storage	1	0	0	0	Raw Material Blen	1.4E-02	3,614,745	25	425	NESHAP LLL	--	--
T002091	Raw Additive Storage	1	0	0	0	Raw Material Blen	1.4E-02	3,614,745	25	500	--	--	--
T002092	Silo Storage-Gypsum to Finish Mills	1	0	0	0	Gypsum	1.4E-02	27,864	0	50	--	--	--
T002093	Clinker Storage from 4RK-1 Cooler System	1	0	0	0	Clinker	1.4E-02	2,076,894	14	502	NESHAP LLL	--	--
T002094	Clinker Storage	1	0	0	0	Clinker	1.4E-02	1,445,400	10	300	NESHAP LLL	--	--
T002095	Silo, Gypsum & Clay Storage	1	0	0	0	Gypsum	1.4E-02	0	0	150	--	--	--
T002096	Gypsum Storage	1	0	0	0	Gypsum	1.4E-02	89,706	1	150	NESHAP LLL	--	--
T002097	Silo Storage for Reclaim Coal	1	0	0	0	Coal	1.4E-02	234,917	2	150	NSPS Y	--	--
T002110	Cement Storage (Plastic) Truck Loadout #3	1	0	0	0	Cement	1.4E-02	1,314,000	9	150	NESHAP LLL	--	--
T002139	Gypsum Storage for Finishing Mills #1 & 3	1	0	0	0	Gypsum	1.4E-02	27,864	0	150	--	--	--
T002228	Clinker Holding Tank for Bypass	1	0	0	0	Clinker	1.4E-02	374,610	3	250	NESHAP LLL	--	--
T003212	Storage tanks for waste oil (inactive)	-	-	-	-	-	-	--	--	-	--	--	--
T003213	Storage tanks for waste oil (inactive)	-	-	-	-	-	-	--	--	-	--	--	--
T003235	Railroad Cement Loadout	1	0	0	0	Cement	1.4E-02	1,681,920	11	192	NESHAP LLL	--	--
T010019	Limestone silo for finish mill	4	0	0	0	Limestone	5.5E-02	54,462	1	7	--	--	--
								Total	**2,341**				

Calculation Factors

0.014	lb/ton; PM_{10} uncontrolled emission factor for material transfer points (AP42 13.2.4)
0.015	lb/ton; PM_{10} uncontrolled emission factor for fines crushing (AP42 11.19.2-2)
0.072	lb/ton; PM_{10} uncontrolled emission factor for fines screening (AP42 11.19.2-2)
0%	control efficiency of baghouse for transfer points, crushing, and screens with special equipment features
0%	control efficiency of baghouse for transfer points, crushing, and screens
0%	control efficiency of unenclosed transfer points
0%	control efficiency for hoods and foggers
0%	control efficiency for clinker dome storage

Notes:
1. PTE throughput is calculated using two methods. The lower of the two values is used to calculate PTE Emissions. The two methods are:
   a.) 2018 throughput multiplied by 1.5,
   b.) max hourly throughput multiplied by 8760 hours/year
2. Due to the size and moisture of wood chips, assumed a factor of 0.1 was applied to the EF for the wood system. Also applied the 75% control for hoods and foggers.
3. This unit decreases loader handling of bauxite. Assume 75% control in the first stockpile material handling step is allocated to this B010042
4. CAM is marked as potentially applicable if PTE emissions are greater than 100 tpy and the unit is not subject to a NESHAP/NSPS

F. CONCLUSIONS AND RECOMMENDATION:

The District has reviewed the application for the renewal of MCC Federal Operating Permit. The District has determined that the renewal is in compliance with all applicable District, state, and federal rules and regulations as proposed when operated in the terms of the permit conditions given herein, and the attached revised FOP. The proposed permit and corresponding statement of legal and factual basis will be released for public comment and publicly noticed pursuant to District Rule 1207. To view the public notice please refer to Appendix A of this document.

APPENDIX A

Public Notice

Noticing Methods include the following, per District Rule 1207 (A)(1)(a):

- Scheduled to be published in newspapers of general circulation - Riverside Press Enterprise (Riverside County) and the Daily Press (San Bernardino County) on May 8, 2020.
- Mailed and/or emailed to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in Appendix A).
- Posted on the MDAQMD Website at the following link: https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry

NOTICE OF TITLE V PERMIT RENEWAL –
PRELIMINARY DETERMINATION

NOTICE IS HEREBY GIVEN THAT *Mitsubishi Cement Corporation – Cushenbury Plant (MCC),* located 5808 Highway 18 in Lucerne Valley, California, has applied for the renewal of a Federal Operating Permit (FOP) pursuant to the provisions of MDAQMD Regulation XII. *MCC* is a Portland Cement manufacturing facility located in Lucerne Valley, which includes the mining and processing of limestone, excavation, conveying, calcining, crushing, screening, storage, and transporting of materials including their primary product, cement. This proposed action will not result in a net increase in regulated air pollutants.

REQUEST FOR COMMENTS: Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed renewal of *MCC's* Federal Operating Permit. If you submit written comments, you may also request a public hearing on the proposed issuance of the Federal Operating Permit. To be considered, comments, documents and requests for public hearing must be submitted no later than 5:00 P.M. on June 8, 2020, to the MDAQMD, Attention: Sheri Haggard at the address listed below.

PETITION FOR REVIEW: Federal Operating Permits are also subject to review and approval by the United States Environmental Protection Agency (USEPA). If the USEPA finds no objection to the proposed permit, the final permit is issued. In the event of public objection to the issuance of a specific permit, a Title V petition may be submitted to the USEPA Administrator electronically through the Central Data Exchange at: https://cdx.epa.gov/. In order to file a Title V petition, issues must be raised with reasonable specificity during the public comment period, and filed within 60 days of the close of the USEPA review period.

AVAILABILITY OF DOCUMENTS: The proposed Federal Operating Permit, as well as the application and other supporting documentation are available for review at the MDAQMD offices, 14306 Park Avenue, Victorville, CA 92392. In addition, these documents are available on the MDAQMD website and can be viewed at following link: https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry. Please contact Sheri Haggard, Air Quality Engineer at the address, above, or (760) 245-1661, extension 1864, or at shaggard@mdaqmd.ca.gov for additional questions pertaining to this action and/or corresponding documents.

Traducción en español esta disponible por solicitud. Por favor llame: (760) 245-1661

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APPENDIX B

CAM Plans

B001009 – Primary & Secondary Crushing System

Control devices: C001013

COMPLIANCE ASSURANCE MONITORING (CAM): FABRIC FILTER FOR PM CONTROL
Mitsubishi Cement Corporation

I. Background

A. Emissions Unit
   a. Description: Primary and Secondary Crushing System
   b. Identification: B001009
   c. Facility: Mitsubishi Cement Corporation, Cushenbury Plant

B. Applicable Regulation, Emission Limit, and Monitoring Requirements
   a. Regulation #: MDAQMD Rule 401 (Visible emissions)
   b. Emissions limit: As dark or darker in shade as that designated No. 1 on the Ringelmann Chart as published by the U.S. Bureau of Mines or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described above.
   c. Monitoring requirements: Visible emissions (Method 22)

C. Control Technology
   a. Baghouse, 2-DC-1 (C001013)

II. Monitoring Approach – The key elements of the monitoring approach are presented in Table 1.

B001011 – Crushing, Stockpiling, and Pre-blending System
Control devices: C001014, C001016, C001017, C001335, C001336, C001337, and C001339

COMPLIANCE ASSURANCE MONITORING (CAM): FABRIC FILTER FOR PM CONTROL
Mitsubishi Cement Corporation

I. Background

D. Emissions Unit
   a. Description: Crushing, stockpiling, and pre-blending system
   b. Identification: B001011
   c. Facility: Mitsubishi Cement Corporation, Cushenbury Plant

E. Applicable Regulation, Emission Limit, and Monitoring Requirements
   a. Regulation #: MDAQMD Rule 401 (Visible emissions)
   b. Emissions limit: As dark or darker in shade as that designated No. 1 on the Ringelmann Chart as published by the U.S. Bureau of Mines or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described above.
   c. Monitoring requirements: Visible emissions (Method 22)

F. Control Technology
   a. Baghouse, 2-DC-2 (C001014)

II. Monitoring Approach – The key elements of the monitoring approach are presented in Table 1.

COMPLIANCE ASSURANCE MONITORING (CAM): FABRIC FILTER FOR PM CONTROL
Mitsubishi Cement Corporation

I. Background

G. Emissions Unit
   a. Description: Crushing, stockpiling, and pre-blending system
   b. Identification: B001011
   c. Facility: Mitsubishi Cement Corporation, Cushenbury Plant

H. Applicable Regulation, Emission Limit, and Monitoring Requirements
   a. Regulation #: MDAQMD Rule 401 (Visible emissions)
   b. Emissions limit: As dark or darker in shade as that designated No. 1 on the Ringelmann Chart as published by the U.S. Bureau of Mines or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described above.
   c. Monitoring requirements: Visible emissions (Method 22)

I. Control Technology
   a. Baghouse, 2-DC-3 (C001016)

II. Monitoring Approach – The key elements of the monitoring approach are presented in Table 1.

COMPLIANCE ASSURANCE MONITORING (CAM): FABRIC FILTER FOR PM CONTROL
Mitsubishi Cement Corporation

I. Background

J. Emissions Unit
   a. Description: Crushing, stockpiling, and pre-blending system
   b. Identification: B001011
   c. Facility: Mitsubishi Cement Corporation, Cushenbury Plant

K. Applicable Regulation, Emission Limit, and Monitoring Requirements
   a. Regulation #: MDAQMD Rule 401 (Visible emissions)
   b. Emissions limit: As dark or darker in shade as that designated No. 1 on the Ringelmann Chart as published by the U.S. Bureau of Mines or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described above.
   c. Monitoring requirements: Visible emissions (Method 22)

L. Control Technology
   a. Baghouse, 3-DC-1 (C001017)

II. Monitoring Approach – The key elements of the monitoring approach are presented in Table 1.

COMPLIANCE ASSURANCE MONITORING (CAM): FABRIC FILTER FOR PM CONTROL
Mitsubishi Cement Corporation

I. Background

M. Emissions Unit
   a. Description: Crushing, stockpiling, and pre-blending system
   b. Identification: B001011
   c. Facility: Mitsubishi Cement Corporation, Cushenbury Plant

N. Applicable Regulation, Emission Limit, and Monitoring Requirements
   a. Regulation #: MDAQMD Rule 401 (Visible emissions)
   b. Emissions limit: As dark or darker in shade as that designated No. 1 on the Ringelmann Chart as published by the U.S. Bureau of Mines or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described above.
   c. Monitoring requirements: Visible emissions (Method 22)

O. Control Technology
   a. Baghouse, 2-DC-6 (C001335)

II. Monitoring Approach – The key elements of the monitoring approach are presented in Table 1.

COMPLIANCE ASSURANCE MONITORING (CAM): FABRIC FILTER FOR PM CONTROL
Mitsubishi Cement Corporation

I. Background

P. Emissions Unit
   a. Description: Crushing, stockpiling, and pre-blending system
   b. Identification: B001011
   c. Facility: Mitsubishi Cement Corporation, Cushenbury Plant

Q. Applicable Regulation, Emission Limit, and Monitoring Requirements
   a. Regulation #: MDAQMD Rule 401 (Visible emissions)
   b. Emissions limit: As dark or darker in shade as that designated No. 1 on the Ringelmann Chart as published by the U.S. Bureau of Mines or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described above.
   c. Monitoring requirements: Visible emissions (Method 22)

R. Control Technology
   a. Baghouse, 2-DC-7 (C001336)

II. Monitoring Approach – The key elements of the monitoring approach are presented in Table 1.

COMPLIANCE ASSURANCE MONITORING (CAM): FABRIC FILTER FOR PM CONTROL
Mitsubishi Cement Corporation

I. Background

S. Emissions Unit
   a. Description: Crushing, stockpiling, and pre-blending system
   b. Identification: B001011
   c. Facility: Mitsubishi Cement Corporation, Cushenbury Plant

T. Applicable Regulation, Emission Limit, and Monitoring Requirements
   a. Regulation #: MDAQMD Rule 401 (Visible emissions)
   b. Emissions limit: As dark or darker in shade as that designated No. 1 on the Ringelmann Chart as published by the U.S. Bureau of Mines or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described above.
   c. Monitoring requirements: Visible emissions (Method 22)

U. Control Technology
   a. Baghouse, 2-DC-8 (C001337)

II. Monitoring Approach – The key elements of the monitoring approach are presented in Table 1.

COMPLIANCE ASSURANCE MONITORING (CAM): FABRIC FILTER FOR PM CONTROL
Mitsubishi Cement Corporation

I. Background

V. Emissions Unit
   a. Description: Crushing, stockpiling, and pre-blending system
   b. Identification: B001011
   c. Facility: Mitsubishi Cement Corporation, Cushenbury Plant

W. Applicable Regulation, Emission Limit, and Monitoring Requirements
   a. Regulation #: MDAQMD Rule 401 (Visible emissions)
   b. Emissions limit: As dark or darker in shade as that designated No. 1 on the Ringelmann Chart as published by the U.S. Bureau of Mines or of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described above.
   c. Monitoring requirements: Visible emissions (Method 22)

X. Control Technology
   a. Baghouse, 2-DC-9 (C001339)

II. Monitoring Approach – The key elements of the monitoring approach are presented in Table 1.

COMPLIANCE ASSURANCE MONITORING (CAM): FABRIC FILTER FOR PM CONTROL
Mitsubishi Cement Corporation

CAM: FABRIC FILTER FOR PM CONTROL

Table 1: Monitoring Approach for Visible Emissions

I. Indicator - Measurement Approach	Visible Emissions (opacity) from the baghouse exhaust will be monitored each month per NESHAP* requirements using EPA Method 22 and/or 9 procedures.
II. Indicator range - QIP Threshold	An excursion is defined as the presences of visible emissions. Excursions trigger an inspection, corrective action, and a reporting requirement. The QIP threshold is 2 excursions in a 6 month reporting period.
III. Performance Criteria	
A. Data Representativeness	Measurements are being made at the emission point (baghouse exhaust).
B. Verification of Operational Status	Equipment will be operation during observation.
C. QA/QC Practices and Criteria	The observer shall be a certified as a qualified observer and familiar with EPA Method 22 and 9 procedures.
D. Monitoring Frequency,	Observations shall be recorded at 15 second intervals and recorded if non-zeros.
D-1. Data Collection Procedures	The Visible emission observation is documented by the observer.
D-2. Averaging Period	Each observation recorded shall be deemed to represent the average opacity of emissions for a 15 second period.

*40 CFR 63, Subpart LLL – NESHAP from the Portland Cement Industry: Opacity Monitoring Requirements, (f)(1)(i-iv) – See following page.

CAM: FABRIC FILTER FOR PM CONTROL

40 CFR 63, Subpart LLL – NESHAP from the Portland Cement Industry: Opacity Monitoring Requirements

Section 63.1350(f)(1)(i-iv)

(f) *Opacity monitoring requirements.* If you are subject to a limitation on opacity under § 63.1345, you must conduct required opacity monitoring in accordance with the provisions of paragraphs (f)(1)(i) through (vii) of this section and in accordance with your monitoring plan developed under § 63.1350(p). You must also develop an opacity monitoring plan in accordance with paragraphs (p)(1) through (4) and paragraph (o)(5), if applicable, of this section.

(1)(i) You must conduct a monthly 10-minute visible emissions test of each affected source in accordance with Method 22 of appendix A-7 to part 60 of this chapter. The performance test must be conducted while the affected source is in operation.

(ii) If no visible emissions are observed in six consecutive monthly tests for any affected source, the owner or operator may decrease the frequency of performance testing from monthly to semi-annually for that affected source. If visible emissions are observed during any semi-annual test, you must resume performance testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

(iii) If no visible emissions are observed during the semi-annual test for any affected source, you may decrease the frequency of performance testing from semi-annually to annually for that affected source. If visible emissions are observed during any annual performance test, the owner or operator must resume performance testing of that affected source on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

(iv) If visible emissions are observed during any Method 22 performance test, of appendix A-7 to part 60 of this chapter, you must conduct 30 minutes of opacity observations, recorded at 15-second intervals, in accordance with Method 9 of appendix A-4 to part 60 of this chapter. The Method 9 performance test, of appendix A-4 to part 60 of this chapter, must begin within 1 hour of any observation of visible emissions.

CAM Stepwise Evaluation, Updated Jul. 30, 2019:

The following is a list of steps involved in evaluating CAM requirements for MCC emission units:

1) Define units to be evaluated for CAM applicability:
   - Make a current list of all B & T solid material handling units at the plant (including kiln, clinker cooler, raw mill, finish mills, other affected sources under NESHAP, coal mill, sand plant, and all other solid material handling equipment), and associated control devices.
   - Also list all other types of units at plant (per category list discussed below).
   - Identify inactive units, assumed to be exempt from CAM.

2) Check whether the unit has an emission limitation or standard and uses a control device to achieve compliance, in which case the unit is potentially subject to CAM:
   - For all B&T units, divide solid material handling **(SMH)** units into the following NSPS and NESHAP applicability groups and CAM status of these units is evaluated below (**assume** that all solid material handling units included in CAM table have emission standards and use a control device with the two exceptions as stated below under #4):
     - NSPS Y (coal mill)
     - NSPS OOO (sand plant)
     - NESHAP kiln
     - NESHAP clinker cooler
     - NESHAP raw mill and finish mills
     - NESHAP other affected sources
     - Other solid material handling units not subject to NSPS and NESHAP
   - For emergency generators (stationary), the CAM status of these units is evaluated below.
   - For other types of units (other than solid material handling and emergency generators), assume not subject to CAM because these units have low uncontrolled emissions:
     - Waste oil storage tanks and gasoline dispensing
     - Portable generators
     - Space heating (unpermitted)
     - Other units

3) Evaluate whether the SMH unit is exempt from CAM because the unit is subject to an NSPS or NESHAP that was promulgated after November 11, 1990-the following are exempt from CAM:
   - SMH units subject to NESHAP LLL (Portland Cement) are exempt from CAM
   - Emergency generators subject to NESHAP ZZZZ (RICE) are exempt from CAM
   - SMH units subject to NSPS Y and NSPS OOO are not exempt from CAM
   - Other SMH units not subject to either NSPS and NESHAP are not exempt from CAM

4) If an SMH unit is potentially subject to CAM based on #3 (i.e., not exempt, i.e. NSPS Y/OOO, non-NESHAP), compare the unit's uncontrolled emissions to the 100 ton/year PM major source threshold.

- Uncontrolled emissions are based on fugitive emissions of the B & T units, with 0%
- control (see CAM table on the following pages). For kiln, since no fugitive emissions, use 100X emissions (i.e. 99% control).
- For the primary & secondary crusher and the pre-blending system, these units are over 100 tons/year uncontrolled emissions and are subject to CAM.

5) For two SMH units that are subject to CAM, a CAM plan was prepared for each unit per the required format (see Appendix B)

B001009 - Primary & Secondary Crushing System

- Control devices: C001013

B001011 - Crushing, Stockpiling, and Pre-blending System

- Control devices: C001336, C001337, C001339, C001014, C001016, C001017, and C001335