MOJAVE DESERT
AIR QUALITY MANAGEMENT DISTRICT

Preliminary Determination/Decision - Statement of Basis

for

Modification to

Federal Operating Permit 100005

For:

CEMEX Construction Materials Pacific, LLC

Facility:

CEMEX River Plant and Mountain Quarry Plant

Facility Address:

16888 North E Street
Victorville, CA 92394

Document Date: 11-02-20
Submittal date to EPA/CARB for review: 11-20-20
EPA/CARB 45-day Commenting Period ends: 01-4-21
Public Notice Posted: 11-25-20
Public Commenting Period ends: 12-25-20
Permit Issue date: 01-05-21

Permitting Engineer:
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A. Introduction

1. Application and Setting

CEMEX – Victorville Plant-Quarry Facility (Cemex) is a Portland cement manufacturing facility located in San Bernardino County (Victorville and Apple Valley), which consists of two kilns (Kiln Q2 and Kiln Q3), associated clinker coolers, support equipment, and alternative fuel feed systems, and a blending, milling, finishing and shipping site connected by dedicated railway.

The Mojave Desert Air Quality Management District (MDAQMD or District) received an application on January 21, 2020 proposing modifications to each existing permitted kiln to allow the combustion of additional alternative fuels through the existing alternative fuel infrastructure (permits B010327 and B011678), specifically this permitting action proposes:

- Modification of Kiln Q2 (permit unit B001083) to explicitly allow alternative fuels including engineered fuels and horse bedding, without any change to production, Btu input or allowable emissions.
- Modification of Kiln Q3 (permit unit B005362) to explicitly allow alternative fuels including engineered fuels and horse bedding, without any change to production, Btu input or allowable emissions.

A copy of this application can be viewed in Appendix A.

Pursuant to District Rule 1301 – *New Source Review Definitions*, Cemex is an existing Major Facility for the nonattainment (or precursor) pollutants NO_x, PM_{10}, SO_x and VOC. Pursuant to District Rule 1303 – *New Source Review Requirements*, any New or Modified Permit Units are therefore subject to both the BACT and Offset requirements for NO_x and VOC (ozone Precursors), PM_{10} and SO_x (PM_{10} Precursor). The proposed modification does not constitute an NSR Modification, as defined under District Rule 1301, as there are no new Permit Units or Modifications (resulting in a Net Emissions Increase) proposed; as a result BACT and offsets are not required. This document serves as the preliminary decision for NSR purposes.

In addition, Cemex is defined as a federal Major Facility pursuant to District Rule 1201 – *Federal Operating Permit Definitions.* The proposed modification classifies as a Minor Modification to the Cemex Federal Operating Permit (FOP). Pursuant to District Rule 1205 – *Modifications of Federal Operating Permits*, section (B)(2), this document serves as the preliminary determination to issue Cemex the modified FOP, inclusive of the proposed changes.

2. Description of Project

a. *Modification to Kiln Q2 (B001083):*
Kiln Q2 is currently permitted for a variety of supplemental fuels, with a daily individual category use recordkeeping requirement:

- Generated by CEMEX in California: Ultrasorb 248, Tribol's Molub-Alloy, used bags from dust collectors, shop rags any or all of which may have variable quantities of Unocal products such as but not limited to Drillube 320, Turbine Oils (100 and 450), Unax AW (46 and 68), HiTemp EP Grease 2, Multiplex EP2, Unoba Grease (2 and 0),

MP Gear Lube LS 85W-140, Extra Duty NL Gear Lube (2EP, 4EP, 5EP, 6EP, and 7 EP), up to 400 lbs/day including containers);
- Tire Derived Fuel as whole or chipped tires or a combination thereof, including tubes, plugs, seals and tire trimmings (limited to 29% of total kiln Btu feed rate per hour);
- Wood chips, painted wood products/chips, trash and dirt free up (limited to 40% of total kiln Btu feed rate per hour);
- LUST remediation sand from Cemex only;
- Used oil filters from Cemex only (up to 5.5 lb/ton of kiln feed);
- Biosolids (limited to 10.5 tons per hour);
- Pistachios and/or almond shells (limited to 10.5 tons per hour); and
- Refuse Derived Fuel (limited to 15 tons per hour).

Cemex proposes to expand this list to:
- From Cemex California operations: dust collector bags, absorbents, adsorbents, lubricants, shop rags, used oil filters and LUST remediation sand
- Tire Derived Fuel (TDF) (including whole and shredded tires with or without the steel belt material (tire fluff))
- Plastics (including polyethylene plastics used in agriculture and silviculture which may include incidental amounts of chlorinated plastics)
- Biosolids
- Cellulosic Biomass Untreated (including untreated lumber, tree stumps, tree limbs, slash, bark, sawdust, sander dust, wood chip scraps, wood scraps, wood slabs, wood millings, wood shavings and processed pellets made from wood or other forest residue)
- Refuse Derived Fuels (RDF) (generated from residential domestic waste and other non-hazardous waste, and including post-recycled paper, cardboard, plastics, and fabrics)
- Horse Bedding (including wood chips, horse urine and horse manure that is blended with saw dust as needed)
- Cellulosic Biomass Treated (including preservative treated wood (which may include treatments such as creosote, copper-chromium-arsenic (CCA), alkaline-copper-quaternary (ACQ)), painted wood, resinated woods (plywood, particle board, medium density fiberboard, oriented strand board, laminated beams, finger-jointed trim and other sheet goods)
- Roofing Material (including non-asbestos containing roofing shingles and related roofing materials with the bulk of the incombustible grit material removed)
- Agricultural Biogenic Materials (including pistachio shells, almond shells, peanut hulls, rice hulls, corn husks, citrus peels, cotton gin by-products, animal bedding and other similar types of materials)
- Carpet Derived Fuel (including shredded new, reject or used carpet materials)
- Alternative Fuel Mix (including a blended combination of otherwise allowed materials)
- Engineered Fuel (fuel engineered to have targeted, consistent fuel properties such as caloric value, moisture, particle size, ash content and volatility. Controlled through blending of non-hazardous combustible materials or through separation of non-hazardous incombustible materials from combustible materials. Engineered largely from post recycled paper, cardboard, plastics, fabrics, animal meal, automotive manufacturing

secondary material, clean-up debris from natural disasters, processed municipal solid waste, paint filter cake, non-infectious hospital materials, pharmaceuticals, cosmetics and confiscated narcotics.

- Additional Non-Hazardous Alternative Fuels Not Specifically Listed (non-hazardous alternative fuels not otherwise listed that burn with similar characteristics to the fuels already authorized, do not cause an increase in any regulated pollutant emissions, and do not contain hazardous metals or chlorine in concentrations above those found in the fuels already authorized).

b. Modification to Kiln Q3 (B005362):

Kiln Q3 is currently permitted for a variety of supplemental fuels, with a daily individual category use recordkeeping requirement:

- UNOCAL Gearite (internally generated), up to 2.5 gallons per minute.
- Tire Derived Fuel (TDF) as whole or chipped tires or a combination thereof; TDF may be either whole or chipped tires or a combination of both, including tubes, plugs, seals and tire trimmings; as up to 29% of the total Btu kiln feed rate for any hour or 26% on a 24 hour average basis (the TDF may be injected/catapulted into the front end of the kiln, or introduced at the kiln feed shelf via a chute, or suspended in the tertiary air combustor (TAC) in the tertiary air duct (TAD));
- Wood chips, Painted Wood Products/Chips, trash- and dirt-free, as up to 40% of the total Btu kiln feed rate on a 24 hour average basis (injected/catapulted into the front end of the kiln, or introduced at the kiln feed shelf via a chute, or suspended in the tertiary air combustor (TAC) in the tertiary air duct (TAD).
- LUST remediation sand from CEMEX Victorville and Apple Valley facilities, as kiln feed;
- Used oil filters from CEMEX California operations via a TDF chute, up to 5.5 lb/ton of kiln feed.
- Materials from CEMEX California operations via a TDF chute, specifically Ultrasorb 248, Tribol Molub-Alloy, used dust collector bags, and used shop rags, up to 400 lbs/day including containers.
- Biosolids with fuel feed rate not to exceed 9.5 tph; introduced into the kiln pneumatically with fully enclosed ducts or tubing.
- Pistachios and/or Almond shells with fuel feed rate not to exceed 9.5 tph; introduced into kiln K3 pneumatically with fully enclosed ducts or tubing.
- RDF fuel rate not to exceed 15 tph and shall be introduced into kiln K3 pneumatically with fully enclosed ducts or tubing into the calciner or the front end of the kiln.

Cemex proposes to expand this list to:

- From Cemex California operations: dust collector bags, absorbents, adsorbents, lubricants, shop rags, used oil filters and LUST remediation sand
- Tire Derived Fuel (TDF) (including whole and shredded tires with or without the steel belt material (tire fluff))
- Plastics (including polyethylene plastics used in agriculture and silviculture which may include incidental amounts of chlorinated plastics)
- Biosolids

- Cellulosic Biomass Untreated (including untreated lumber, tree stumps, tree limbs, slash, bark, sawdust, sander dust, wood chip scraps, wood scraps, wood slabs, wood millings, wood shavings and processed pellets made from wood or other forest residue)
- Refuse Derived Fuels (RDF) (generated from residential domestic waste and other non-hazardous waste, and including post-recycled paper, cardboard, plastics, and fabrics)
- Horse Bedding (including wood chips, horse urine and horse manure that is blended with saw dust as needed)
- Cellulosic Biomass Treated (including preservative treated wood (which may include treatments such as creosote, copper-chromium-arsenic (CCA), alkaline-copper-quaternary (ACQ)), painted wood, resinated woods (plywood, particle board, medium density fiberboard, oriented strand board, laminated beams, finger-jointed trim and other sheet goods)
- Roofing Material (including non-asbestos containing roofing shingles and related roofing materials with the bulk of the incombustible grit material removed)
- Agricultural Biogenic Materials (including pistachio shells, almond shells, peanut hulls, rice hulls, corn husks, citrus peels, cotton gin by-products, animal bedding and other similar types of materials)
- Carpet Derived Fuel (including shredded new, reject or used carpet materials)
- Alternative Fuel Mix (including a blended combination of otherwise allowed materials)
- Engineered Fuel (fuel engineered to have targeted, consistent fuel properties such as caloric value, moisture, particle size, ash content and volatility. Controlled through blending of non-hazardous combustible materials or through separation of non-hazardous incombustible materials from combustible materials. Engineered largely from post recycled paper, cardboard, plastics, fabrics, animal meal, automotive manufacturing secondary material, clean-up debris from natural disasters, processed municipal solid waste, paint filter cake, non-infectious hospital materials, pharmaceuticals, cosmetics and confiscated narcotics.
- Additional Non-Hazardous Alternative Fuels Not Specifically Listed (non-hazardous alternative fuels not otherwise listed that burn with similar characteristics to the fuels already authorized, do not cause an increase in any regulated pollutant emissions, and do not contain hazardous metals or chlorine in concentrations above those found in the fuels already authorized).

Permit conditions will be added to each kiln limiting alternative fuels to those materials which can be characterized as non-hazardous secondary materials (and therefore not solid waste) as defined and controlled by 40 CFR 241 Subpart B. In addition, a kiln exhaust source test for compliance with 40 CFR 63 Subpart LLL and for evaluation of toxics emissions and impact will be required prior to the introduction of 30,000 tons of each alternative fuel in the expanded list.

B. Analysis

1. Determination of Emissions

[District Rule 1302(C)(1)]

The proposed modifications do not constitute a NSR Modification, as defined under District Rule 1301(HH), as the proposed changes do not result in any Net Emissions Increase (no emission limitation is changing).

2. Determination of Nonattainment NSR Requirements

[District Rule 1302(C)(2)]

a. BACT Evaluation

[District Rule 1302(C)(2)(a)]

Best Available Control Technology (BACT) is required for each Modified Permit Unit at a Modified Facility that emits, or has the Potential to Emit, twenty-five (25) tons per year or more of any Nonattainment Air Pollutant or its Precursors (District Rule 1303(A)(3)). Cemex has a facility PTE in excess of twenty-five (25) tons per year for the Nonattainment Air Pollutant and Precursors of NO_x, PM_{10}, SO_x and VOC. BACT is not required on the proposed kiln modifications since these modifications do not result in a net emissions increase and do not meet the definition of a Modified Permit Unit pursuant to District Rules 1303(A) and 1301(HH).

b. *Offsets Evaluation*
[District Rule 1302(C)(3)]

Offsets are required for any new or modified Facility or Emissions Unit which has the Potential to Emit a Regulated Air Pollutant in an amount greater than or equal to the thresholds for the Nonattainment Air Pollutants and their Precursors specified in District Rule 1303 (B)(1). As the proposed permitting action results in no Net Emissions Increase as indicated in the Determination of Emissions section above, offsets are not required.

3. Determination of Requirements for Toxic Air Contaminants

[District Rule 1302(C)(5)]

a. *District Rule 1320:*
Pursuant to District Rule 1320 – *New Source Review for Toxic Air Contaminants*, Cemex is subject to both State and Federal Toxic New Source Review, as MCC is a Modified Facility (or Emissions Units) which has the potential to emit a Toxic Air Contaminant, as well contains Emissions Units which are subject to an Airborne Toxic Control Measure (State T-NSR), and MCC also has the potential to emit 10 tons per year of any single Hazardous Air Pollutant (Federal T-NSR). Pursuant to the requirements of District Rule 1320, an applicability analysis of state and federal air toxic regulations was conducted for the proposed equipment (State T-NSR and Federal T-NSR, respectively). The State T-NSR and Federal T-NSR analyses are described below:

1. State T-NSR:
Section (E)(1)(b) of District Rule 1320 requires that if any ATCM applies to the proposed equipment, the requirements of that ATCM shall be added to the District permit. There are no ATCMs that apply to the affected equipment proposed in this permitting action.

Pursuant to District Rule 1320, section (E)(2), State T-NSR also requires an Emission Unit Prioritization Score for new or modified Emission Units. As the proposed modifications are not an NSR Modification as defined under District Rule 1301(HH), no further State T-NSR action is required.

2. Federal T-NSR:
Pursuant to section (F)(1) of District Rule 1320, the proposed permit modifications were analyzed to determine if any current, enforceable Maximum Achievable Control Technology (MACT) standards apply to the equipment affected by this permitting action, and if so to ensure that those requirements are enforced by permit condition. All of the equipment proposed for modification are subject to 40 CFR 63, Subpart LLL – NESHAP for Portland Cement Manufacturing Industry and the applicable requirements of this MACT are reflected in the Cemex Federal Operating Permit.

b. District Rule 1520 – Toxic Hot Spots Analysis:
District Rule 1520 – *Control of Toxic Air Contaminants from Existing Sources* applies to Cemex, as they are an existing facility that has a facility PTE greater than ten (10) tons per year for NO_x, PM_{10}, SO_x and VOC, as well as a PTE to emit a TAC (Section (B)(1)(a) and (c)). Cemex's most recently approved (2018 emission year) full Comprehensive Emission Inventory Report (CEIR) was utilized to fulfill the requirements of section (D)(1)(b)(i) of District Rule 1520. Section (E)(1)(a)(ii) requires prioritization scores to be calculated utilizing the most recently approved CAPCOA Facility Prioritization Guidelines, the most recently approved OEHHA Unit Risk Factor for cancer potency factors, and the most recently approved OEHHA Reference Exposure Levels for non-cancer acute factors, and non-cancer chronic factors. Therefore, Cemex prepared the Facility Prioritization Scores using the July 2016 *CAPCOA Facility Prioritization Guidelines* (as these are the latest approved), and account for the recent updates to the OEHHA's Risk Assessment Guidance Document. The prioritization was calculated, using these parameters, and the Facility Prioritization Scores for Cemex are less than (1) which categorizes Cemex as 'Low Priority'. Based on the requirements of District Rule 1520, section (E)(1)(b), no further analysis is required. Cemex's toxic emissions are routinely tracked on an annual basis as part of the District's Hot Spots Program.

	Cancer Priority	Chronic Noncancer Priority	Acute Noncancer Priority
Current EY 2018 Facility Prioritization Score	0.63	5.93E-02	5.93E-02

4. Determination of Requirements for Prevention of Significant Deterioration
[District Rule 1302(C)(6)]

a. PSD Analysis
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". The proposed modification does not result in a new major stationary source and does not constitute a major modification; hence, the project is not subject to PSD.

b. NAAQS Impact Analysis

District Rule 1302, section (D)(5)(b)(iv) requires that any new or Modified Facility located in an area classified by USEPA as attainment or unclassifiable shall determine if the Facility will cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS). The proposed modification, discussed herein, do not cause an increase in emissions; therefore, the proposed project will not contribute to a violation of the NAAQS.

7. Rules and Regulations Applicable to the Proposed Project

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. Cemex is in compliance with this rule as they appropriately applied for a District permit for all new equipment and maintains District permits for all residing equipment.

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. The District has imposed permit conditions to ensure Cemex complies with all applicable regulations.

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.

Rule 207 – *Altering or Falsifying of Permit.* A person shall not willfully deface, alter, forge, or falsify any issued permit.

Rule 209 – *Transfer and Voiding of Permits*. Cemex 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.

Rule 210 – *Applications*. Cemex provided all the required information to correctly address the proposed equipment 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 221 – *Federal Operating Permit Requirement.* Cemex is in compliance with this rule, as they currently hold and maintain a Federal Operating Permit.

Rule 301 – *Permit Fees*. The proposed permit modifications will not change Cemex's annual permit fees.

Rule 401 – *Visible Emissions*. This rule limits visible emissions opacity to less than 20 percent (or Ringelmann No. 1). In normal operating mode, visible emissions are not expected to exceed 20 percent opacity.

Rule 402 – *Nuisance*. This rule prohibits facility emissions that cause a public nuisance. The proposed modifications and associated equipment is required by permit condition to employ good engineering and operational principles in order to minimize emissions and the possibility of a nuisance.

Rule 408 – *Circumvention*. This rule prohibits hidden or secondary rule violations. The proposed modifications as described are not expected to violate Rule 408.

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.

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. There are no NSPSs applicable to the proposed permitting action.

Regulation X – *National Emission Standards for Hazardous Air Pollutants*. Pursuant to Regulation X, Cemex is required to comply with all applicable ATCMs. There are no ATCM requirements triggered by this permitting action.

Rule 1161 – *Portland Cement Kilns*. Rule 1161 limits the emissions of NO_X from existing Portland cement kilns. Cemex has two existing Portland cement Preheater-Precalciner kilns, and is currently compliant with the NO_X limit of Rule 1161.

Regulation XII – *Title V Permits*. This regulation contains requirements for sources which must have a FOP. Cemex currently has a FOP and is expected to comply with all applicable rules and regulations.

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

Rule 1203 – *Federal Operating Permits*. This document represents the preliminary determination for the proposed modifications to Cemex's FOP. This proposed Significant Modification will also be properly noticed pursuant to District Rule 1207, as required.

Rule 1205 – *Modifications of Federal Operating Permits*. The proposed equipment classifies as a Significant Modification to Cemex's Federal Operating Permit (FOP), and subsequently, this permit modification is issued in accordance with the provisions of District Rule 1203.

Rule 1208 – *Certification*. Cemex included a Certification of Responsible Official as required with the submitted application for the proposed equipment.

Rule 1211 – *Greenhouse Gas Provisions of Federal Operating Permits*. Cemex is a Major GHG Facility pursuant to Rule 1211. Cemex's FOP includes all the requirements of this rule.

Regulation XIII – *New Source Review*
Rule 1302 – *Procedure*. This rule applies to all new or Modified Facilities and requires certain requirements to be fulfilled when submitting an application. All applicable requirements of this rule are discussed in this NSR document as part of the Analysis procedure. Certification of compliance with the Federal Clean Air Act, applicable implementation plans, and all applicable District rules and regulations have been addressed. The Authority to Construct (ATC) application package for the proposed equipment includes sufficient documentation to comply with Rule 1302(D)(5)(b)(ii). Permit conditions for the proposed project will require compliance with Rule 1302(D)(5)(b)(iii).

Rule 1303 – *Requirements*. This rule requires BACT and offsets for selected facility modifications. Equipment installed shall meet BACT and prior to the commencement of construction the proponent shall have obtained sufficient offsets to comply with Rule 1303(B)(1). The proposed permitting action does not trigger BACT or offsets.

Rule 1304 – *Emissions Calculations*. The Proposed Emissions from the proposed modifications were calculated pursuant to section (B)(1)(a) of this rule.

Rule 1320 – *New Source Review for Toxic Air Contaminants*. Pursuant to the requirements of District Rule 1302, an applicability analysis of state and federal air toxic regulations was conducted for the proposed modifications (State T-NSR and Federal T-NSR, respectively) and is discussed in further detail in section (B)(3)(a)(1) of this document.

Rule 1520 – *Control of Toxic Air Contaminants from Existing Sources*. The proposed project is subject to Rule 1520, as Cemex has a facility PTE greater than ten (10) tons per year for VOC, PM, and NO_x, as well as a PTE to emit a TAC (Section (B)(1)(a) and (c)). A Toxic 'Hot Spots' Program Analysis was conducted pursuant to section (E) of District Rule 1520. Facility Prioritization Scores were calculated pursuant to this rule and the results of the analysis is discussed in further detail in section (B)(6), above.

Regulation XVII – *Prevention of Significant Deterioration*. The purpose of this regulation is to set for requirements for all new Major PSD Facilities and Major PSD Modifications which emit or have the potential to emit a PSD Air Pollutant pursuant to the requirements of 40 CFR 52.21. The proposed modification does not constitute a new Major PSD Facility or a Major PSD Modification; therefore, PSD does apply to the proposed project.

State Regulations

No state regulations are applicable to the proposed permitting action.

Federal Regulations

40 CFR 60, Subpart A – *NSPS General Provisions.* Cemex complies with this regulation per Appendix A of their FOP.

40 CFR 60, Subpart Y – *NSPS for Coal Preparation Plants and Processing Plants*. Cemex complies with this regulation per Appendix A of their FOP.

40 CFR 60, Subpart OOO – *NSPS for Nonmetallic Mineral Processing Plants*. Cemex complies with this regulation per Appendix A of their FOP.

40 CFR 60, Subpart DDDD – *Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units*. Cemex is exempt from this regulation by only using non-solid waste as combustion fuel, as defined by 40 CFR section 241.3. See conditions in Part III of their FOP.

40 CFR 60, Subpart IIII – *NSPS for Stationary Compression Ignition Internal Combustion Engines*. Cemex complies with this regulation per conditions in Part III of their FOP.

40 CFR 61, Subpart M – *NES for Asbestos*. Cemex complies with 40 CFR 61, Subpart M – *NESHAP for Asbestos* per conditions in Part II, section C of their FOP.

40 CFR 63, Subpart A – *NESHAP General Provisions*. Cemex complies with this regulation per Appendix A of their FOP.

40 CFR 63, Subpart LLL – *NESHAP for the Portland Cement Industry*. Cemex complies with this regulation per Appendix A of their FOP.

40 CFR 63, Subpart ZZZZ – *NESHAP for Stationary Reciprocating Internal Combustion Engines*. Cemex complies with this regulation per conditions in Part III of their FOP.

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 Cemex facility currently has three PSEU applicable to CAM. Please refer to the corresponding CAM Plan in Appendix B of their FOP.

40 CFR 82, *Protection of Stratospheric Ozone*. Cemex complies with this regulation per conditions in Part IV of their FOP.

40 CFR 98, *Mandatory Greenhouse Gas Reporting*. Cemex complies with this regulation per conditions in Part II, section C of their FOP.

8. NSR Preliminary Decision - Conclusion

The District has reviewed the proposed modifications and application for Cemex and conducted a succinct written analysis as required by District Rule 1302, section (D)(1)(b) and District Rule 1203, section (B)(1)(a). The District has determined that the proposed permit modifications and application are in compliance with all applicable District, state, and federal rules and regulations as proposed and when operated in terms of the permit conditions of the associated revised FOP.

C. Title V Permit/FOP – Significant Permit Modification

1. Proposed Changes to FOP

The proposed changes to the FOP are indicated in the red-line version of the draft FOP dated November 2, 2020.

2. CAM Analysis

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; AND,
b. Use a control device to achieve compliance; AND,
c. Have the potential pre-control emissions that exceed or are equivalent to the major source threshold.

The Cemex facility currently has three PSEU applicable to CAM. Please refer to the full CAM Analysis under Appendix B of their FOP. The proposed permit modifications does not trigger new CAM requirements.

2. Title V/FOP Preliminary Determination – Conclusion

The District has reviewed the applications and proposed modifications to Cemex's Federal Operating Permit. The District has determined that the proposed modification 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.

This preliminary determination will be submitted to USEPA, CARB, and the public for review and comment. Please refer to the cover page of this document for the dates pertaining to USEPA/CARB review, public review, and permit issuance.

D. Comment Period and Notifications

1. Public Comment

This preliminary determination will be publicly noticed. Please refer to the cover page of this document for the dates pertaining to USEPA/CARB review, public review, and permit issuance. Please see Appendix C for noticing details.

2. Notifications

The preliminary determination will be submitted to USEPA and CARB pursuant to District Rule 1207 for a forty-five (45) day review period. Please refer to the cover page of this document for the dates pertaining to USEPA/CARB review, public review, and permit issuance.

All correspondence as required by District Rules 1302 and 1207 were forwarded to electronically to the following recipients:

Director, Office of Air Division
United States EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Submitted electronically to USEPA's Central Data Exchange – Electronic Permitting System
https://cdx.epa.gov/

Chief, Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
emailed to permits@arb.ca.gov

Alejandra V. Silva
Environmental Manager
CEMEX Construction Material Pacific, LLC
16888 North E Street
Victorville, CA 92307-9341
emailed to alejandrav.silva@cemex.com

Appendix A
Application

January 10, 2020

Mr. Sam Oktay
Mojave Desert Air Quality Management District (MDAQMD)
14306 Park Avenue
Victorville, CA 92392-2310
soktay@mdaqmd.ca.gov

via e-mail

Subject: **Minor Title V Modification, TV Permit 100005**
CEMEX Construction Material Pacific, LLC
CEMEX – Victorville Plant-Quarry Facility
Minor Title V Modification

Dear Mr. Oktay:

CEMEX Construction Material Pacific, LLC (CEMEX), is submitting the enclosed Title V - Permit Amendment/Modification (Form 1202-N) for the CEMEX – Victorville Plant-Quarry Facility located in San Bernardino County, California.

The enclosed form is being submitted to supplement the Authority to Construct Permit Application, submitted under a separate cover letter, to authorize the use of Engineered Fuel, horse bedding, and other additional alternative fuels in the kilns. The use of these fuels should not change any applicable state or federal requirements and this action should be considered a Minor Title V Modification.

If you have any questions or require additional information, please do not hesitate to contact me by email at alejandrav.silva@cemex.com or by phone at (760) 381-7649.

Sincerely,

Alejandra V Silva
Environmental Manager

Enclosures

c: Ms. Anna de la Garza (POWER Engineers, Inc.) via email
Ms. Darlene Marie Bray, Director - Environmental, CEMEX USA (via e-mail)

Mojave Desert Air Quality Management District

TITLE V – PERMIT AMENDMENT / MODIFICATION

I. **PERMIT ACTION** (Check appropriate box)

☐ ADMINISTRATIVE AMENDMENT ☒ MINOR MODIFICATION ☐ SIGNIFICANT MODIFICATION

☐ OFF-PERMIT CHANGE

1. FACILITY NAME: CEMEX - Victorville Plant-Quarry Facility

2. FACILITY ID: 00005 / 00006

3. TITLE V PERMIT NO: 100005

4. TYPE OF ORGANIZATION: ☒ Corporation ☐ Sole Ownership ☐ Government ☐ Partnership ☐ Utility

5. COMPANY NAME: CEMEX Construction Material Pacific, LLC

6. COMPANY MAILING/BILLING ADDRESS:
STREET/P.O. BOX: 16888 North E Street
CITY: Victorville STATE: California 9-DIGIT ZIP CODE: 92394-2999

7. FACILITY ADDRESS:
STREET: 25220 Black Mountain Quarry Road
CITY: Apple Valley STATE: California 9-DIGIT ZIP CODE: 92307-9341

PROPOSED DATE OF INSTALLATION: N/A no new equipment

8. DISTANCES (FEET AND DIRECTION) TO CLOSEST:
FENCELINE: >1,000 ft / SE RESIDENCE: >5,280 ft/ West BUSINESS: >5,280 ft / West SCHOOL: >5,280 ft / South

9. GENERAL NATURE OF BUSINESS: Cement Manufacturing - Manufacturing Clinker for Cement

10. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE
(include Permit #'s if known, and use additional sheets if necessary)

This application is to incorporate the authorization for the use of Engineered Fuel, horse bedding, and other alternative fuels in the kilns. This modification does not change any existing federal or state regulatory applicability or monitoring for the kilns and meets the criteria for a minor modification.

Affected Permit Numbers: B001083, B005362, B010327, and B011678

11. PERSON TO CONTACT FOR INFORMATION ON THIS APPLICATION:

NAME: Alejandra V Silva PHONE NUMBER: 760-381-7649

TITLE: Environmental Manager EMAIL: alejandrav.silva@cemex.com

II. COMPLIANCE CERTIFICATION (Read each statement carefully and check all for confirmation):

[X] Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

[X] Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

[X] Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

[X] Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Signature of Responsible Official

01/14/2020
Date

Luis G. Lopez
Name of Responsible Official (please print)

Plant Manager
Title of Responsible Official (please print)

For AQMD Use Only:

DATE STAMP	*DISTRICT PERMIT APPLICATION NO:* _____	*COMPANY /FACILITY ID:* _____

January 10, 2020

Mojave Desert Air Quality Management District (MDAQMD) *via e-mail*
14306 Park Avenue
Victorville, CA 92392-2310

Subject: **Authority to Construct Permit Modification Application**
CEMEX Construction Material Pacific, LLC
CEMEX – Victorville Plant-Quarry Facility
25220 Black Mountain Quarry Road
Apple Valley, CA 92307
San Bernardino County

MDAQMD:

CEMEX Construction Material Pacific, LLC (CEMEX), is submitting the enclosed Authority to Construct Permit Modification Application for the CEMEX - Victorville Plant-Quarry Facility located in San Bernardino County, California to authorize changes for alternative fuel in Kiln Q2 (Permit B001083) and Kiln Q3 (Permit B005362).

If you have any questions or require additional information, please do not hesitate to contact me by email at alejandrav.silva@cemex.com or by phone at (760) 381-7649.

Sincerely,
CEMEX USA

Alejandra V. Silva
Environmental Manager

Enclosures

c: Ms. Anna de la Garza, POWER Engineers, Inc. (via email)
Ms. Darlene Marie Bray, Director - Environmental, CEMEX USA (via e-mail)

January 2020

AUTHORITY TO CONSTRUCT
PERMIT MODIFICATION APPLICATION

CEMEX Construction Material Pacific, LLC
CEMEX – Victorville Plant-Quarry Facility
San Bernardino County, California

Submitted To:
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, California 92392-2310

PROJECT NUMBER:
158420.01.01

POWER ENGINEERS

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FIGURES:

APPENDICES:

1.0 INTRODUCTION

1.1 Project Overview

CEMEX Construction Material Pacific, LLC (CEMEX) owns and operates CEMEX - Victorville Plant-Quarry Facility (Victorville) located in San Bernardino County, California. The site is a cement plant that consists of two kilns (Kiln Q2 and Kiln Q3), associated clinker coolers, support equipment, and alternative fuel feed systems.

The purpose of this submittal is to request the authorization to use horse bedding and Engineered Fuels (EF) as alternative fuels and the use of several other established alternative fuels that have been authorized at other CEMEX facilities.

This Authority to Construct Permit Modification Application includes documentation as required by the Mojave Desert Air Quality Management District (MDAQMD). Victorville plans to use the existing, permitted alternative fuel systems (Permit Numbers: B010327 and B011678) to introduce the proposed alternative fuels into the kilns. CEMEX is not proposing any changes to equipment authorized under permits B010327 and B011678.

The overall British thermal unit (Btu) kiln feed rate will not increase. As these alternative fuels are used, the traditional fossil fuel usage will be accordingly decreased. CEMEX is not requesting an increase in the permitted production rate or an increase in permit allowable emissions for either kiln with this application. Continuous Emission Monitoring Systems (CEMS) on the kilns will be used to demonstrate compliance with the existing permit limits and limits under 40 CFR Part 60, Subpart LLL.

EF consists of non-hazardous combustible materials that meet consistent specifications and is formulated to ensure consistent and predictable fuel properties.

Horse bedding is a collection of wood chips, horse urine, and horse manure. The material was analyzed for heavy metals and mercury. The analysis of the material using EPA Method 6010B showed non-detect for many metals including mercury, and showed levels of barium, copper, manganese, selenium, and zinc were at or below the concentration levels in currently authorized fuels and alternative fuels. A fuel comparison table is included in Appendix C.

Established alternative fuels may include, but are not limited to; cellulosic biomass treated, roofing material, agricultural biogenic materials, carpet derived fuel, and alternative fuel mix. These fuels, as well as the previously authorized fuels, are listed and further described in Appendix B. These established alternative fuels have been authorized at other CEMEX sites and proven to burn with similar characteristics as the fuels already burned onsite.

CEMEX requests that these fuels be added to the alternative fuels currently listed and authorized in permits B1001083 and B005362. CEMEX also proposes that additional non-hazardous alternative fuels not specifically mentioned here, be allowed under the permit, as long as any new alternative fuels burn with similar characteristics to the fuels already authorized and burned onsite, do not cause an increase in any regulated pollutant emissions, and do not contain hazardous metals or chlorine in concentrations above concentrations found in the fuels already authorized and burned onsite.

Chlorine emissions are a function of the raw material quality, not fuel-bound chlorine. The combustion of the fuel-bound chlorine will release chlorine compounds but will not reach the main stack because the

cement raw materials scrub the fuel-bound chlorine compounds and the resulting compounds are integrated into the clinker product. In addition, Victorville currently uses a CEMS on each kiln to monitor sulfur dioxides (SO_2) which is a surrogate for chlorine. CEMEX finds the use of the CEMS during usage of EF, horse bedding and/or proposed other alternative fuels to be sufficient for ongoing compliance. The site can perform additional stack tests, if requested, to demonstrate continuous compliance.

The use of EF, horse bedding, and proposed other alternative fuels is intended primarily to replace traditional fossil fuels such as coal and coke consistent with CEMEX's commitment to reduce CO_2 emissions from fossil fuels, as part of the Cement Sustainability Initiative of the World Business Council for Sustainable Development (WBCSD), and as part in CEMEX's strategy for meeting California Greenhouse Gas Cap and Trade Program requirements. Since these alternative fuels offer CO_2 emission reduction benefits and have been proven to burn with similar characteristics to the traditional fuels, CEMEX requests the removal of limitations on alternative fuel usage.

San Bernardino County is currently classified as nonattainment for ozone, particulate matter with an aerodynamic diameter less than 10 microns (PM_{10}), and particulate matter with an aerodynamic diameter less than 2.5 microns ($PM_{2.5}$). Victorville is a major source under the Federal Operating Permits program (Title V) program.

2.0 EQUIPMENT AND SITE PROCESS INFORMATION

2.1 Equipment Description and Operating Schedule

The Kiln Q2 and clinker cooler system consists of coal milling, a pre-heater/pre-calciner short cement kiln, and a clinker cooler assembly.

The Kiln Q3 and clinker cooler system consists of coal milling, a pre-heater/pre-calciner kiln, and a clinker cooler assembly.

Currently permitted alternative fuels in Special Condition 13 of B1001083 and Special Condition 15 of B005362 include: tire derived fuel (TDF), refuse derived fuels (RDF), wood chips (defined as wood chips, painted wood products/chips, trash- and dirt-free), pistachios and/or almond shells, used oil filters, remediation sand, biosolids, gearite, and other materials generated on-site as noted in the permit. CEMEX is proposing to authorize additional alternative fuels (see list in Appendix B).

Kiln Q2, Kiln Q3, the alternative fuels transfer, storage, and injection process, and the alternative fuels storage hall and conveyance system are expected to operate 8,736 hours per year and 24 hours per day. This is the same as currently permitted.

2.2 Process Description

EF includes, but is not limited to, post recycled paper, cardboard, plastics, fabrics, animal meal, automotive manufacturing u-product, clean-up debris from natural disasters, paint filter cake, hospital materials (non-infectious), pharmaceuticals (expired prescriptions), cosmetics, and confiscated narcotics. EF will have a minimum heating value of 5,000 British thermal units per pound (Btu/lb).

Horse bedding is a collection of wood chips, horse urine and horse manure. The material will go through a mechanical process to ensure that the material is sized approximately 1-inch minus. The material will also be blended with saw dust, as needed, to ensure a moisture content of 25% or less and an approximate heating value of 5,000 British thermal units per pound (Btu/lb).

Established alternative fuels may include, but are not limited to; cellulosic biomass treated, roofing material, agricultural biogenic materials, carpet derived fuel, and alternative fuel mix. These fuels are further described in Appendix B. The established alternative fuels have been authorized at other CEMEX sites and proven to burn with similar characteristics as the fuels already burned onsite.

Additional non-hazardous alternative fuels not specifically mentioned, will burn with similar characteristics to the fuels already authorized and burned onsite, will not cause an increase in any regulated pollutant emissions, and will not contain hazardous metals or chlorine in concentrations above concentrations found in the fuels already authorized and burned onsite.

The EF, horse bedding, and other proposed alternative fuels, like the alternative fuels already permitted at the site, will be stored, loaded, and conveyed using the existing alternative fuel systems to feed Kiln Q2 and Kiln Q3.

Kiln Q2 and Kiln Q3 will not emit any new regulated air pollutant because of combusting EF, horse bedding, or other proposed alternative fuels. Pollutants include nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), particulate matter (PM), $PM_{2.5}$, PM_{10}, SO_2, and carbon dioxide

equivalent (CO_2e). There is no proposed increase in clinker production capacity or total fuel use capacity from the use of the EF, horse bedding, or other proposed alternative fuels and does not result in any net emission increase.

2.3 Process Weight and Fuels Burned

EF and horse bedding will have a minimum heating value of 5,000 British thermal units per pound (Btu/lb).

2.4 Best Available Control Technology (BACT)

Per Rule 1303(A) BACT is required for any Modified Permit Unit which emits, or has the Potential to Emit, 25 pounds per day or more of any Nonattainment Air Pollutant. MDAQMD Regulation XIII Rule 1301 defines a modification as:

***Modification** (Modified) - Any physical or operational change to a Facility or an Emissions Unit to replace equipment, expand capacity, revise methods of operation, or modernize processes by making any physical change, change in method of operation, addition to an existing Permit Unit and/or change in hours of operation which results in a **Net Emissions Increase** of any Regulated Air Pollutant or which results in the **emission of any Regulated Air Pollutant not previously emitted**.*

As previously discussed, there is no new regulated air pollutants emitted or proposed increase in clinker production capacity with the use of EF, horse bedding, or any proposed alternative fuels. There is also no increase in fuel use capacity in terms of Btu/hr. Reducing the usage of coal will assist with reducing the CO_2 emissions. Therefore, the proposed use of additional alternative fuel does not result in any net emission increase and is not considered a "modification" under MDAQMD Regulation XIII and is not subject to the BACT per Rule 1303(A).

3.0 EMISSIONS DATA

3.1 Net Emissions Change

According to Rule 1304(B)(a), the emissions change for a new or modified Facility or Emissions Unit(s) shall be calculated in pounds per day, by subtracting Historic Actual Emissions (HAE) from Proposed Emissions. Per Regulation 1304(D)(2)(a)(iv), HAE is defined as:

For purposes of Section (B) above, in the case of a modified Facility, HAE for an Emission Unit may be equal to the Potential to Emit for that Emission Unit, as indicated by a Federally Enforceable Emissions Limitation, if all the emissions from that Emissions Unit have been previously offset in a documented prior permitting action pursuant to Regulation XIII or prior rules 203.1, 203.2, 213, 213.1, 213.2 and 213.3.

Kiln Q2 and Kiln Q3 are fully offset units. Consistent with Rule 1304(D)(2)(a)(iv), because emissions from the kilns are fully offset, HAE is assumed to be equal to the PTE emissions. Victorville is not requesting any changes to current PTE levels that have been approved by MDAQMD. Therefore, the net emissions increases are calculated as zero.

3.2 Offsets Evaluation

As discussed in the prior section, since using EF, horse bedding, or any proposed alternative fuels is not considered a modified facility under Regulation XIII, offset requirements under Regulation 1303 do not apply to this project. As such, this project is not subject to MDAQMD Regulation XIII's NSR provisions.

4.0 SITE LOCATION

Victorville is in San Bernardino County, approximately 11 miles northeast of Bell Mountain, California.

Address: 25220 Black Mountain Quarry Road, Apple Valley, California 92307

4.1 Receptors

Sycamore Rocks Elementary School is the nearest school to the site and is approximately 29,637 feet away. The closest business is approximately 20,660 feet away and closest residence is approximately 18,500 feet away (see attached area map).

4.2 Scaled Area Map and Equipment Location Map

A scaled area map that shows the location of the Victorville site and the nearest receptors is included in this section as Figure 1. An equipment location map that shows the approximate location of Kiln Q2 and Kiln Q3 is included in this section as Figure 2.

FIGURE 1 AREA MAP

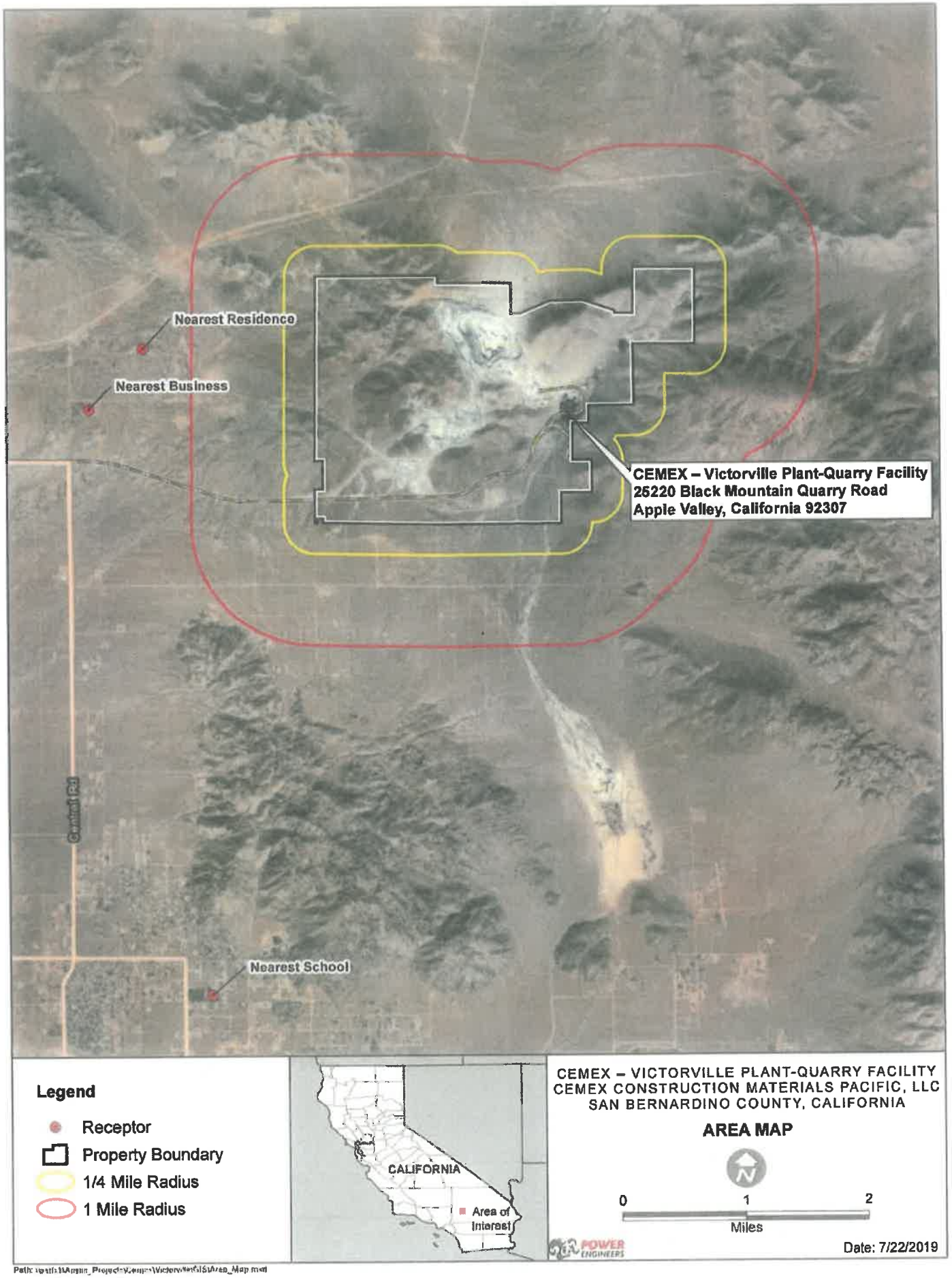
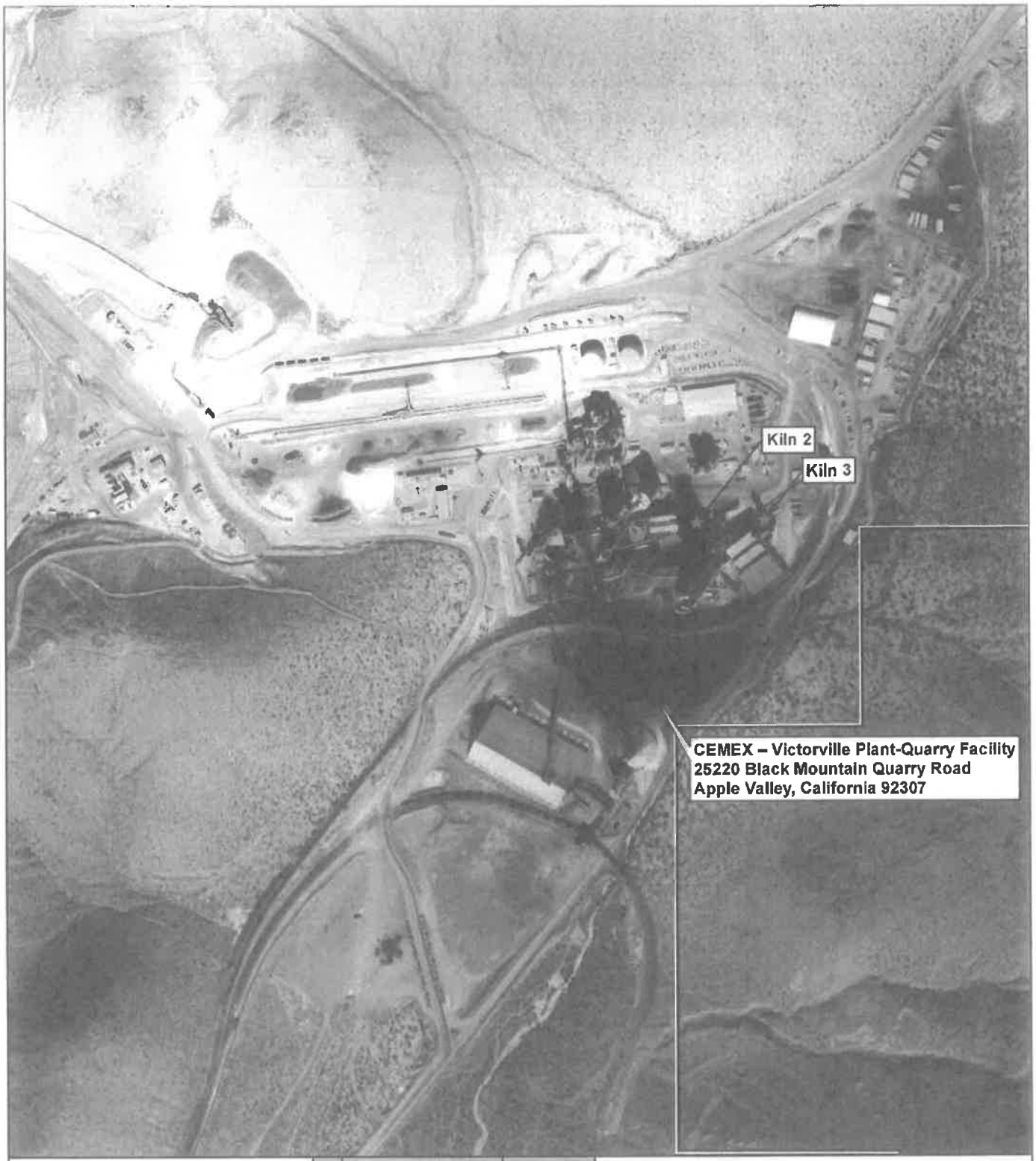

Nearest Residence
Nearest Business
CEMEX – Victorville Plant-Quarry Facility
25220 Black Mountain Quarry Road
Apple Valley, California 92307
Nearest School
Legend
Receptor
Property Boundary
1/4 Mile Radius
1 Mile Radius
CALIFORNIA
Area of Interest
CEMEX – VICTORVILLE PLANT-QUARRY FACILITY
CEMEX CONSTRUCTION MATERIALS PACIFIC, LLC
SAN BERNARDINO COUNTY, CALIFORNIA
AREA MAP
0
1
2
Miles
POWER ENGINEERS
Date: 7/22/2019

FIGURE 2 EQUIPMENT LOCATION MAP



Legend

- Equipment Location
- Property Boundary

CEMEX – VICTORVILLE PLANT-QUARRY FACILITY
CEMEX CONSTRUCTION MATERIALS PACIFIC, LLC
SAN BERNARDINO COUNTY, CALIFORNIA

EQUIPMENT LOCATION MAP

0 500 1,000
Feet

MRV POWER ENGINEERS

Date: 7/22/2019

Path: \\mrv1\Airdat_Projects\Cemex\Victorville\GIS\Equipment_Location_Kilns.mxd

APPENDIX A MDAQMD FORMS

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT
BRAD POIRIEZ, *EXECUTIVE DIRECTOR*
14306 Park Avenue, Victorville, CA 92392-2310
760.245.1661 • Fax 760.245.2022
Email: **engineering@mdaqmd.ca.gov**
www.MDAQMD.ca.gov • @MDAQMD

General Application Form

Remit **$288.00** with this document *(**$164.00** for change of owner)*

PLEASE TYPE OR PRINT

Section 1: Owner information

a. Permit to be issued to (company name): CEMEX Construction Material Pacific, LLC			b. Federal tax ID #: 72-0296500
c. Mailing/billing address (for above company name) *include city, state and zip code:* 16888 North "E" Street, Victorville, CA 92394			
d. Facility or business license name (for equipment location): CEMEX Construction Material Pacific, LLC			
e. Facility Address — Location of equipment (if same as for company, enter "Same"): 25220 Black Mountain Quarry Road, Apple Valley, CA 92307			Equip. coordinates (lat/long): 34.62417 / -117.100619
f. Contact name: Alejandra V. Silva	Title: Environmental Manager	Email address: alejandrav.silva@cemex.com	Phone: (760) 381-7649
General nature of business: Cement Manufacturing			Company NAICS: 327310

Type of Organization
☐ Individual owner ☐ Partnership ☑ Corporation ☐ Utility ☐ Local agency ☐ State agency
☐ Federal agency

Section 2: Nature of application

Application is hereby made for the following equipment:
Use of Engineered Fuel, horse bedding, and multiple alternative fuels in Kiln Q2.

Application is for what type of permit:
☐ New construction ☑ Modification ☐ Change of owner

For modification or change of owner:
B001083 Current Permit Number

Do you claim Confidentiality of Data? ☑ No ☐ Yes (attach explanation; specify which information provided is confidential)

Section 3: Equipment information

Equipment description (give a brief description of the equipment and/or process):
CEMEX proposes the use of Engineered Fuel (EF), horse bedding and multiple alternative fuels that have been authorized at other CEMEX facilities in Kiln Q2. The EF consists of non-hazardous combustible materials that meet consistent specifications. The horse bedding is a collection of wood chips, horse urine, and horse manure. Additional alternative fuels to include, but not limited to, cellulosic biomass treated, roofing material, agricultural biogenic materials, carpet derived fuel, and alternative fuel mix. CEMEX also proposes flexibility to use Additional Non-Hazardous Alternative Fuels Not Specifically Listed as further defined in the application.

Manufacturer: N/A Model: N/A Serial number: N/A

Add-on air pollution control equipment? ☐ Yes ☑ No (Note: *most APCE require a separate application*)

If yes: Manufacturer: N/A Model: N/A Serial #: N/A CARB EO#: N/A

Type (specify): N/A

Stack data Exhaust stack height from ground: _____ feet Exhaust stack diameter: _____ feet

Stack is: ☐ horizontal ☐ vertical ☐ open ☐ weather cap

Vent data: Exhaust temp _____ °F Maximum exhaust rate (CFM): _____

-For District use only-

Application number:	Invoice number:	Permit number:	Company/facility number:

Section 4: Emissions data

Emission Factor Basis (attach any source specified):

☐ Manufacturer ☐ Source test ☐ MDAQMD default ☐ USEPA AP-42
☐ Other (please specify):

Emissions data:

Pollutant	Pre-control max. emissions	Units	Post control max. emissions	Units
NO_x				
NMHC				
CO				
PM_{10}				
SO_x				

Toxic pollutants — Please include a list of all toxic air pollutants and their emission rates if known.

Section 5: Operation information

Fuel Consumption: 500 ton/day at max rated load ☐ gal/hour ☐ SCF/hour ☐ MMBtu/hr

Typical load:

Facility annual operation by quarters (percent):
☑ Uniform OR _____ % Jan-Mar _____ % Apr-Jun
_____ % Jul-Sep _____ % Oct-Dec

Expected operating hours of equipment
24 Hrs/day 7 Days/wk 52 Wk/yr
Total annual hours 8,736

Section 6: Receptor information

Distance (feet) and direction to the property line of closest: >1,000 ft residence >5,280 ft business >5,280 ft school

Name of closest school (K-12) Sycamore Rocks Elementary School

If the proposed equipment operates within 1,000 feet of a school site and operation results in the emission of hazardous air pollutants, a public notice will be required at the expense of the applicant (CH&S §42301.6)

***Please note:** *District staff may contact you for further information. Failure to provide additional information as requested in a timely manner may result in delays in the processing of this permit application.*

Section 7: Certification

I hereby certify that all information contained herein is true and correct.

Luis G. Lopez	Plant Manager		01/14/2020
Name of responsible official	Official title	Signature of responsible official	Date signed

Phone: (760) 952-4864 or (760) 951-3471 Email: luisguillermo.lopez@cemex.com

Application submission instructions:

1) Submit completed application to Engineering@mdaqmd.ca.gov
2) Pay the corresponding application fee of $288 per permit for new or modified permit (or $164 for change of owner) via check or credit card.

Payment by check:
Make check payable to the Mojave Desert AQMD
Mail the check with a copy of this completed application to:
Mojave Desert AQMD
14306 Park Avenue
Victorville, CA 92392

Payment by credit card:
Pay online at **http://www.mdaqmd.ca.gov**
Click ***"Pay Fees"***
Please note: ***a surcharge applies for all credit card payments.***

3) If payment is made online via credit card, please email the receipt to Engineering@mdaqmd.ca.gov

Should you have any additional questions, please, do not hesitate to contact the permitting division at 760-245-1661, or via email at **engineering@mdaqmd.ca.gov**

Government Payment Service
GovPayNet
7820 Innovation Boulevard Suite 250
Indianapolis,IN 46278
24hr. Customer Service #: 888-604-7888

Applications Payment Confirmation (Ref #: 27680947)

PLC: 8094 **Mojave Desert Air Quality Management District**
14306 Park Avenue
Victorville, California 92392
For: Applications

Date: 01/14/2020 17:07 EST

TRANSACTION INFORMATION

Contact's Name:	Alejandra Silva
Doing Business As:	Cemex Construction Materials Pacific, Llc
Company Name:	Cemex Construction Materials Pacific, Llc
Street Address:	16888 North E St. Victorville, Ca 92394
Telephone #:	(760)381-7649
Site Address:	16888 North E Street Victorville, Ca 92394
Equipment Description:	Cemex Vict- Engineered Fuel K2

Transaction Reference #:	27680947
Transaction Date/Time:	01/14/2020 17:07 EST

BILLING INFORMATION

Name:	Kandyl E Martinez
Address:	16888 North E St.
City, State Zip:	Victorville, Ca 92394
Phone #:	(760)381-7649
Card #:	xxxx-xxxx-xxxx-2448

PAYMENT INFORMATION

Approval #:	089201
Payment Amount:	$288.00
Service Fee:	$11.25
Total Amount:	$299.25

The service fee is not refundable.

ATTENTION CARDHOLDER
If you have questions about the processing of your payment, please call GovPayNet at 888-604-7888.

Thank you for using GovPayNet

Form #: EUR

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT
BRAD POIRIEZ, *EXECUTIVE DIRECTOR*
14306 Park Avenue, Victorville, CA 92392-2310
760.245.1661 • Fax 760.245.2022
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e. Facility Address — Location of equipment (if same as for company, enter "Same"): 25220 Black Mountain Quarry Road, Apple Valley, CA 92307			Equip. coordinates (lat/long): 34.62417 / -117.100619
f. Contact name: Alejandra V. Silva	Title: Environmental Manager	Email address: alejandrav.silva@cemex.com	Phone: (760) 381-7649
General nature of business: Cement Manufacturing			Company NAICS: 327310

Type of Organization
☐ Individual owner ☐ Partnership ☑ Corporation ☐ Utility ☐ Local agency ☐ State agency
☐ Federal agency

Section 2: Nature of application

Application is hereby made for the following equipment:
Use of Engineered Fuel, horse bedding, and multiple alternative fuels in Kiln Q3.

Application is for what type of permit:
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For modification or change of owner:
B001083 Current Permit Number

Do you claim Confidentiality of Data? ☑ No ☐ Yes (attach explanation; specify which information provided is confidential)

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CEMEX proposes the use of Engineered Fuel (EF), horse bedding and multiple alternative fuels that have been authorized at other CEMEX facilities in Kiln Q3. The EF consists of non-hazardous combustible materials that meet consistent specifications. The horse bedding is a collection of wood chips, horse urine, and horse manure. Additional alternative fuels to include, but not limited to, cellulosic biomass treated, roofing material, agricultural biogenic materials, carpet derived fuel, and alternative fuel mix. CEMEX also proposes flexibility to use Additional Non-Hazardous Alternative Fuels Not Specifically Listed as further defined in the application.

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If yes: Manufacturer: N/A Model: N/A Serial #: N/A CARB EO#: N/A

Type (specify): N/A

Stack data Exhaust stack height from ground: _____ feet Exhaust stack diameter: _____ feet

Stack is: ☐ horizontal ☐ vertical ☐ open ☐ weather cap

Vent data: Exhaust temp. _____ °F Maximum exhaust rate (CFM): _____

-For District use only-

Application number:	Invoice number:	Permit number:	Company/facility number:

Section 4: Emissions data

Emission Factor Basis (attach any source specified): Please, see attached document

☐ Manufacturer ☐ Source test ☐ MDAQMD default ☐ USEPA AP-42

☐ Other (please specify): _____

Emissions data: _____

Pollutant	Pre-control max. emissions	Units	Post control max. emissions	Units
NO_x				
NMHC				
CO				
PM_{10}				
SO_x				

Toxic pollutants — Please include a list of all toxic air pollutants and their emission rates if known.

Section 5: Operation information

Fuel Consumption: 500 ton/day at max rated load ☐ gal/hour ☐ SCF/hour ☐ MMBtu/hr

*Typical load: _____

Facility annual operation by quarters (percent):
☑ Uniform OR _____ % Jan-Mar _____ % Apr-Jun
_____ % Jul-Sep _____ % Oct-Dec

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Total annual hours 8,736

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I hereby certify that all information contained herein is true and correct.

Luis G. Lopez	Plant Manager		01/14/2020
Name of responsible official	Official title	Signature of responsible official	Date signed
Phone: (760) 952-4864 or (760) 951-3471		Email: luisguillermo.lopez@cemex.com	

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Payment by credit card:
Pay online at **http://www.mdaqmd.ca.gov**
Click ***"Pay Fees"***
Please note: ***a surcharge applies for all credit card payments.***

3) If payment is made online via credit card, please email the receipt to Engineering@mdaqmd.ca.gov

Should you have any additional questions, please, do not hesitate to contact the permitting division at 760-245-1661, or via email at **engineering@mdaqmd.ca.gov**

Government Payment Service
GovPayNet
7820 Innovation Boulevard Suite 250
Indianapolis,IN 46278
24hr. Customer Service #: 888-604-7888

Applications Payment Confirmation (Ref #: 27680974)

PLC: 8094
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, California 92392
For: Applications

Date: 01/14/2020 17:09 EST

TRANSACTION INFORMATION

Contact's Name:	Alejandra Silva
Doing Business As:	Cemex Construction Materials Pacific, Llc
Company Name:	Cemex Construction Materials Pacific, Llc
Street Address:	16888 North E St. Victorville, Ca 92394
Telephone #:	(760)381-7649
Site Address:	16888 N E Street Victorville, Ca 92394
Equipment Description:	Cemex Vict- Engineered Fuel K3

Transaction Reference #:	27680974
Transaction Date/Time:	01/14/2020 17:09 EST

BILLING INFORMATION

Name:	Kandyl E Martinez
Address:	16888 North E St.
City, State Zip:	Victorville, Ca 92394
Phone #:	(760)381-7649
Card #:	xxxx-xxxx-xxxx-2448

PAYMENT INFORMATION

Approval #:	012075
Payment Amount:	$288.00
Service Fee:	$11.25
Total Amount:	$299.25

The service fee is not refundable.

ATTENTION CARDHOLDER

If you have questions about the processing of your payment, please call GovPayNet at 888-604-7888.

Thank you for using GovPayNet

Form #: EUR

APPENDIX B ALTERNATIVE FUEL LIST

Permitted Alternative Fuel Material
CEMEX - Victorville Plant-Quarry Facility

Tire Derived Fuel (TDF) - Whole and shredded tire with or without the steel belt material (tire fluff)

Plastics – Which includes polyethylene plastics used in agriculture and silviculture, may include incidental amounts of chlorinated plastics

Cellulosic Biomass Untreated – Includes untreated lumber, tree stumps, tree limbs, slash, bark, sawdust, sander dust, wood chip scraps, wood scraps, wood slabs, wood millings, wood shavings and processed pellets made from wood or other forest residue

Refuse Derived Fuels (RDF) – Generated from residential domestic waste and other facilities that process non-hazardous waste. Includes post recycled paper, cardboard, plastics, fabrics, and possibly other materials listed here as permitted and proposed alternative fuels.

Proposed Alternative Fuel Material
CEMEX - Black Mountain Quarry Plant (Victorville)

Horse Bedding – Includes wood chips, horse urine, and horse manure that is blended with saw dust as needed.

Cellulosic Biomass Treated – Includes preservative treated wood that may contain treatments such as creosote, copper-chromium-arsenic (CCA), alkaline-copper-quatemary (ACQ), painted wood, resonated woods (plywood, particle board, medium density fiberboard, oriented strand board, laminated beams, finger-jointed trim and other sheet goods).

Roofing Material – Non-asbestos containing roofing shingles and related roofing materials with the bulk of the incombustible grit material removed

Agricultural Biogenic Materials – Includes peanut hulls, rice hulls, corn husks, citrus peels, cotton gin by-products, animal bedding and other similar types of materials

Carpet Derived Fuel – Includes shredded new, reject or used carpet materials

Alternative Fuel Mix – Includes a blended combination of two or more of any of the above materials

Engineered Fuel – Fuel engineered to have targeted, consistent fuel properties such as caloric value, moisture, particle size, ash content and volatility. The specific targeted properties are established based on available alternative fuel material supply and are carefully controlled through blending of non-hazardous combustible materials or through separation of non-hazardous incombustible materials from combustible materials (mix of any alternative fuels where the blending and processing is performed to ensure consistent and predictable fuel properties). EF is engineered largely from post recycled paper, cardboard, plastics, and fabrics and could also consist of animal meal, automotive manufacturing u-product, clean-up debris from natural disasters, processed municipal solid waste, paint filter cake, hospital materials (non-infectious), pharmaceuticals (expired prescriptions), cosmetics and confiscated narcotics.

Additional Non-Hazardous Alternative Fuels Not Specifically Listed – Non-hazardous alternative fuels not specifically listed in the permit that: burn with similar characteristics to the fuels already authorized and burned onsite, do not cause an increase in any regulated pollutant emissions, and do not contain hazardous metals or chlorine in concentrations above concentrations found in the fuels already authorized and burned onsite.

APPENDIX C HORSE BEDDING FUEL COMPARISON TABLE AND SAFETY DATA SHEET

CEMEX Construction Material Pacific, LLC
CEMEX - Victorville Plant-Quarry Facility
Fuel Comparison

Fuels Used in Kiln Q2 and Kiln Q3
Horse Bedding
Coal
Coke
Wood Chips
Tire Fluff
Tires

Chemical	Average Concentration					
	Horse Bedding[1] (ppm)	Coal[2] (ppm)	Coke[2] (ppm)	Wood Chips[2] (ppm)	Tire Fluff[2] (ppm)	Tires[2] (ppm)
Antimony	ND[3]	1.5	1.5	1.5	26.2	11.2
Arsenic	ND[3]	1.52	0.5	1.91	0.50	0.50
Barium	15	7.9	2.59	322	29.7	5.36
Beryllium	ND[3]	0.25	1.7	0.25	0.25	0.25
Cadmium	ND[3]	0.25	0.25	0.25	1.16	0.81
Chromium	ND[3]	1.76	0.5	1.18	14.8	3.4
Cobalt	ND[3]					
Copper	5.0	2.03	0.5	5.18	432	6.8
Lead	ND[3]	1.84	0.5	3.75	16.9	29.5
Manganese	60.0	8.78	4.6	41	133	6.25
Mercury	ND[3]	0.07	0.07	0.48	0.07	0.07
Nickel	ND[3]	4.68	215	0.75	8.47	5
Selenium	1.7	1.5	1.5	1.5	1.5	1.5
Silver	ND[3]	0.25	0.25	0.25	0.25	0.25
Thallium	ND[3]	1.5	1.5	1.5	1.5	1.5
Vanadium	ND[3]	10.3	523	0.56	0.63	0.84
Zinc	26	2.5	2.5	303	13500	16800

[1] Chemical concentration for each metal was determined using Method 6010B. The test was performed on May 8, 2018 by Columbia Analytical Services. The horse bedding is produced or owned by Material Recovery Solutions.

[2] Chemical contration for each metal is from the 2017 Toxic Release Inventory Reporting analysis for the site.

[3] ND = non detect

Horse Bedding

Section 1 - CHEMICAL, PRODUCT AND COMPANY IDENTIFICATION

Processor Information:

Material Recovery Solutions, Inc.

7325 Edison Ave

Ontario, Ca 91764

Office Phone #: (562) 577-9047 Office Phone #: (760) 623-6909

SDS Date: 10/11/2018

Synonyms: None Last Revision Date: 06-01-12

Internal Product Codes: 035

Product Use: Horse Bedding

Section 2 - HAZARDS IDENTIFICATION

Product Overview:

Product is made up of Natural wood fibers that are Multi - screened to minimize dust and is utilized in animal bedding applications. This product may contain a minimal amount of wood dust. Inhalation of wood dusts may cause irritation and dryness of the respiratory tract. Repeated skin and inhalation exposure to wood dusts may produce allergic contact dermatitis and respiratory sensitization.

GHS LABEL: ! SIGNAL WORD: WARNING:

Potential Health Effects:

Eyes Exposure to dusts may cause mechanical eye irritation.

Skin Handling of product may cause mechanical skin irritation. Repeated skin contact may

cause an allergic skin sensitization reaction.

Ingestion Ingestion of this product is unlikely. If ingestion does occur, it may produce gastric

irritation and discomfort.

Inhalation Inhalation of wood dusts may cause irritation and dryness of the respiratory system. Repeated inhalation exposure may cause an allergic respiratory sensitization reaction. Prolonged exposure to certain species of wood dusts has been associated with an increased risk of nasal cancers; however, no specific data concerning the type of wood used in this product could be located.

Section 3 - COMPOSITION / INFORMATION ON INGREDIENTS

Components CAS Number % Weight

California (misc horse ranchs) N/A 100

Component Information/Information on Non-Hazardous Components:

This product may be regulated, have exposure limits or other information identified as: Wood Dust, All Soft and Hard Woods.

Section 4 - FIRST AID MEASURES

Eyes: In case of contact, flush eyes with water for 15 minutes. Obtain medical attention if irritation persists.

Skin: In case of contact, wash thoroughly with soap and large amounts of water. If irritation develops, get medical attention.

Ingestion: Due to the physical nature of this material, ingestion is unlikely to occur. If ingestion does occur, seek medical attention.

Inhalation: If dusts from this product are inhaled, remove affected person to fresh air. If respiratory irritation or other symptoms develop, seek medical attention.

Notes to Physician: None.

Section 5 - FIRE FIGHTING MEASURES

Flash Point : N/A

Method Used : N/A

Upper Flammable Limit (UFL) : N/A

Lower Flammable Limit (LFL) : N/A

Auto Ignition : N/A

Flammability Classification : N/A

Rate of Burning : Moderate to rapid

General Fire Hazards:

Product will ignite upon exposure to ignition source.

Hazardous Combustion Products:

Carbon monoxide, carbon dioxide, aldehydes and various hydrocarbon fragments.

Extinguishing Media:

Water, dry chemical, or sand.

Fire Fighting Equipment/Instructions:

Fire fighters should wear full-face, self contained breathing apparatus and impervious protective clothing. Fire fighters should avoid inhaling any combustion products.

Section 6 - ACCIDENTAL RELEASE MEASURES

Containment Procedures: Contain by any means necessary.

Clean-Up Procedures: Wet area with water mist or spray to reduce dust generation and buildup. Vacuum or

sweep up material as necessary.

Evacuation Procedures: Keep unnecessary people out of area.

Special Instructions: Wear appropriate protective clothing during cleanup. Remove sources of ignition

during cleanup.

Section 7 - HANDLING AND STORAGE

Procedures for Handling: Keep dust generation and buildup to a minimum. Avoid inhaling dusts from

this product. Remove all sources of ignition when handling this product.

Recommended Storage Methods: Store in a cool, dry area away from moisture, excessive heat and sources of

ignition.

Section 8 - EXPOSURE CONTROLS / PERSONAL PROTECTION

Exposure Guidelines:

A. General Product Information

Keep formation of dusts to a minimum.

B. Component Exposure Limits

Wood Dust, All Soft and Hard Woods OSHA PEL: 5 mg/m3

; OSHA STEL: 10 mg/m3

Engineering Controls: Ventilation should be sufficient to effectively remove and prevent buildup of dusts while handling and applying this product. Use mechanical ventilation, as necessary.

Personal Protective Equipment:

Eye/Face: Wear safety glasses, goggles, or other appropriate eye/face protection as needed.

Skin: Normal work clothing and appropriate gloves are recommended.

Respiratory: When ventilation is not sufficient to maintain dust levels below the PEL, appropriate

NIOSH/MSHA approved respiratory protection must be provided.

General: None.

Section 9 - PHYSICAL & CHEMICAL PROPERTIES

Appearance: Wood fibers Odor: Mild

Physical State: Solid pH: N/A

Vapor Pressure: N/A Vapor Density: N/A

Boiling Point: N/A Freezing Point: N/A

Section 10 - CHEMICAL STABILITY & REACTIVITY INFORMATION

Chemical Stability: Stable.

Conditions to Avoid: Avoid excessive heat and ignition sources.

Incompatibility: Avoid contact with oxidizing agents and drying oils.

Hazardous Decomposition Products: Carbon monoxide, carbon dioxide, aldehydes and various

hydrocarbon fragments.

Hazardous Polymerization: Hazardous polymerization will not occur.

Section 11 - TOXICOLOGICAL INFORMATION

Acute Toxicity/Target Organ Information:

A. General Product/Component Information

Wood dusts are generally considered respiratory irritants and sensitizers. However, the ability of the dusts to cause sensitization reactions varies greatly with the species of wood.

Epidemiology: No data available for this product.

Carcinogenicity:

A. General Product/Component Information

There is some evidence that exposure to certain wood dusts may be associated with an increased risk of certain nasal cancers. However, that risk appears to vary greatly with the species of wood and the duration and extent of exposure.

B. Component Carcinogenicity Listings

Not listed by ACGIH, IARC, NIOSH, NTP or OSHA.

Reproductive Toxicity: No data available for this product.

Neurotoxicity: No data available for this product.

Mutagenicity: No data available for this product.

Other Information: No data available for this product.

Section 12 - ECOLOGICAL INFORMATION

Ecotoxicity: No data available for this product.

Environmental Fate: 100% of product is composed of natural and biodegradable components.

Section 13 - DISPOSAL CONSIDERATIONS

US EPA Waste Number & Descriptions:

A. General Product Information As shipped, not regulated as a hazardous waste.

B. Component Waste Numbers No EPA Waste Numbers are applicable for this product's

components.

Disposal Instructions: Dispose of waste material in accordance with all applicable Federal,

State or provincial and local environmental regulations.

Section 14 - TRANSPORTATION INFORMATION

DOT Information:

Shipping Name: Not regulated as a hazardous material

Hazard Class: Not regulated

UN/NA #: Not regulated

Packing Group: Not regulated

Label(s) Required: None

Additional Shipping Information: None

International Transportation Regulations: Not regulated as dangerous goods

Section 15 - REGULATORY INFORMATION

US Federal Regulations:

A. General Product Information N/A

B. Component Information None of this product's components are listed under SARA Section 302 (40 CFR 355 Appendix A), SARA Section 313 (40 CFR 372.65) or CERCLA (40 CFR 302.4).

State Regulations:

A. General Product Information N/A

B. Component Information None of this product's components are listed on the state lists from

CA, FL, MA, MN, NJ, or PA.

Other Regulations:

A. General Product Information N/A

B. Component Information None of the components are listed on the Canadian Controlled

Product Ingredient Disclosure List.

Section 16 - OTHER INFORMATION

As the conditions of methods of use are beyond our control, American Excelsior Company does not assume any

responsibility and expressly disclaims any liability for use of this material. Information contained herein is

believed to be true and accurate, but all statements or suggestions are made without warranty, expressed or

implied, regarding accuracy of the information, the hazards connected with the use of this material, or the results

to be obtained thereof. Compliance with all federal, state, provincial, and local laws and regulations remains the

responsibility of the user.

Key/Legend:

ACGIH American Conference of Governmental Industrial Hygienists

CERCLA Comprehensive Environment Response, Compensation, and Liability Act

CFR Code of Federal Regulations

DOT Department of Transportation

EPA Environmental Protection Agency

HMIS Hazard Materials Information System

IARC International Agency for Research Cancer

mg/m3 milligrams per cubic meter

N/A Not applicable or Not available

NFPA National Fire Protection Association

NIOSH National Institute of Occupational Safety and Health

OSHA Occupational Safety and Health Administration

PEL Permissible Exposure Limit

SARA Superfund Amendments and Reauthorization Act

STEL Short Term Exposure Limit

NFPA Ratings: Health: 1, Fire: 1, Reactivity: 0, Other: 0

HMIS Ratings: Health: 1, Fire: 1, Reactivity: 0, Personal Protection: N/A

SDS Contact: American Excelsior Company Phone: (817) 385-3500

End of Application

Appendix B
HARP Prioritization Score/CEIR Data

HARP Facility Prioritization Report

HARP EIM Version: 2.1.2

Receptor Distance 4100 meters
Reporting Year: 2018
Project Path: C:\HARP FILES\Anderson
Project Database: C:\HARP FILES\Anderson\AndersonDB211.mdb
CEIDARS Utility Database: C:\HARP2\Tables\CEIDARSTables072020.mdb
HARP Health Talbe: HEALTH201909
Sorting Order: DIS, AB, CO, TS, FACID
Date Created: 10/27/2020 3:23:49 PM
Operator: CA
****

POLLUTANT HEALTH VALUES FROM HARP HEALTH DATABASE:

POLLUTANT ID	POLLUTANT	CANCERURF(INH) (ug/m^3)^-1	ACUTEREL ug/m^3	CHRONICREL(INH) ug/m^3
106990	1,3-Butadiene	1.70E-04	6.60E+02	2.00E+00
57653857	1-3,6-8HxCDD	3.80E+00	N/A	4.00E-04
57117449	1-3,6-8HxCDF	3.80E+00	N/A	4.00E-04
40321764	1-3,7,8PeCDD	3.80E+01	N/A	4.00E-05
57117416	1-3,7,8PeCDF	1.10E+00	N/A	1.30E-03
19408743	1-3,7-9HxCDD	3.80E+00	N/A	4.00E-04
72918219	1-3,7-9HxCDF	3.80E+00	N/A	4.00E-04
35822469	1-4,6-8HpCDD	3.80E-01	N/A	4.00E-03
67562394	1-4,6-8HpCDF	3.80E-01	N/A	4.00E-03
39227286	1-4,7,8HxCDD	3.80E+00	N/A	4.00E-04
70648269	1-4,7,8HxCDF	3.80E+00	N/A	4.00E-04
55673897	1-4,7-9HpCDF	3.80E-01	N/A	4.00E-03
3268879	1-8OctaCDD	1.10E-02	N/A	1.30E-01
39001020	1-8OctaCDF	1.10E-02	N/A	1.30E-01
1746016	2,3,7,8-TCDD	3.80E+01	N/A	4.00E-05
51207319	2,3,7,8-TCDF	3.80E+00	N/A	4.00E-04
60851345	2-4,6-8HxCDF	3.80E+00	N/A	4.00E-04
57117314	2-4,7,8PeCDF	1.10E+01	N/A	1.30E-04
91576	2MeNaphthalene	N/A	N/A	N/A
83329	Acenaphthene	N/A	N/A	N/A
208968	Acenaphthylene	N/A	N/A	N/A
75070	Acetaldehyde	2.70E-06	4.70E+02	1.40E+02
107028	Acrolein	N/A	2.50E+00	3.50E-01
120127	Anthracene	N/A	N/A	N/A
7440360	Antimony	N/A	N/A	N/A
7440382	Arsenic	3.30E-03	2.00E-01	1.50E-02
56553	B[a]anthracene	1.10E-04	N/A	N/A
50328	B[a]P	1.10E-03	N/A	N/A
205992	B[b]fluoranthen	1.10E-04	N/A	N/A
192972	B[e]pyrene	N/A	N/A	N/A
191242	B[g,h,i]perylen	N/A	N/A	N/A
207089	B[k]fluoranthen	1.10E-04	N/A	N/A
7440393	Barium	N/A	N/A	N/A
71432	Benzene	2.90E-05	2.70E+01	3.00E+00
7440417	Beryllium	2.40E-03	N/A	7.00E-03
7440439	Cadmium	4.20E-03	N/A	2.00E-02

108907	Chlorobenzn	N/A	N/A	1.00E+03
7440473	Chromium	N/A	N/A	N/A
218019	Chrysene	1.10E-05	N/A	N/A
42101	CO	N/A	N/A	N/A
7440484	Cobalt	N/A	N/A	N/A
7440508	Copper	N/A	1.00E+02	N/A
18540299	Cr(VI)	1.50E-01	N/A	2.00E-01
53703	D[a,h]anthracen	1.20E-03	N/A	N/A
1080	DiBenFurans(Cl)	3.80E+01	N/A	4.00E-05
1085	Dioxins-w/	N/A	N/A	N/A
100414	Ethyl Benzene	2.50E-06	N/A	2.00E+03
206440	Fluoranthene	N/A	N/A	N/A
86737	Fluorene	N/A	N/A	N/A
50000	Formaldehyde	6.00E-06	5.50E+01	9.00E+00
7647010	HCl	N/A	2.10E+03	9.00E+00
110543	Hexane	N/A	N/A	7.00E+03
193395	In[1,2,3-cd]pyr	1.10E-04	N/A	N/A
7439921	Lead	1.20E-05	N/A	N/A
7439965	Manganese	N/A	N/A	9.00E-02
7439976	Mercury	N/A	6.00E-01	3.00E-02
91203	Naphthalene	3.40E-05	N/A	9.00E+00
7664417	NH3	N/A	3.20E+03	2.00E+02
7440020	Nickel	2.60E-04	2.00E-01	1.40E-02
42603	NOX	N/A	N/A	N/A
1150	PAHs-w/	N/A	N/A	N/A
198550	Perylene	N/A	N/A	N/A
85018	Phenanthrene	N/A	N/A	N/A
11101	PM	N/A	N/A	N/A
85101	PM10	N/A	N/A	N/A
88101	PM25	N/A	N/A	N/A
115071	Propylene	N/A	N/A	3.00E+03
129000	Pyrene	N/A	N/A	N/A
7782492	Selenium	N/A	N/A	2.00E+01
7440224	Silver	N/A	N/A	N/A
42401	SOX	N/A	N/A	N/A
7440280	Thallium	N/A	N/A	N/A
108883	Toluene	N/A	3.70E+04	3.00E+02
37871004	TotalHeptaCDD	N/A	N/A	N/A
38998753	TotalHeptaCDF	N/A	N/A	N/A
34465468	TotalHexaCDD	N/A	N/A	N/A
55684941	TotalHexaCDF	N/A	N/A	N/A
36088229	TotalPentaCDD	N/A	N/A	N/A
30402154	TotalPentaCDF	N/A	N/A	N/A
41903575	TotalTetraCDD	N/A	N/A	N/A
55722275	TotalTetraCDF	N/A	N/A	N/A
7440622	Vanadium	N/A	3.00E+01	N/A
43104	VOC	N/A	N/A	N/A
1330207	Xylenes	N/A	2.20E+04	7.00E+02
7440666	Zinc	N/A	N/A	N/A

****

PRIORITIZATION SCORE SUMMARY:

Facility Name
Proximity Method
Optional Factors

			Emission and Potency Procedure				Dispersion Adjustment Procedure				Highest
FACID	CO	AB DIS	Cancer	Acute	Chronic	NonCancer	Cancer	Acute	Chronic	NonCancer	Score

CEMEX - BLACK MOUNTAIN QUARRY
Proximity Method:
Annual Operating Hours 8760
Priority Multiplier 0.128

5	36	MD	MOJ	0.63	0.00E+00	5.93E-02	5.93E-02	0.60	0.00E+00	5.71E-02	5.71E-02	0.63

Appendix C
Public Notice

Noticing Methods include the following, per District Rule 1207 (A)(1)(a) and District Rule 1302(D)(2)and(3). Please refer to the cover page of this document regarding the specific public noticing dates:

- Published in newspapers of general circulation - *Riverside Press Enterprise* (Riverside County) and the *Daily Press* (San Bernardino County).
- Mailed and/or emailed to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in this Appendix).
- Posted on the MDAQMD Website at the following link: http://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry

NOTICE OF TITLE V PERMIT SIGNIFICANT MODIFICATION – PRELIMINARY DETERMINATION

NOTICE IS HEREBY GIVEN THAT *CEMEX Construction Materials Pacific, LLC – CEMEX River and Mountain Quarry Plant (CEMEX),* located 16888 North E Street in Victorville, California and at 25220 Black Mountain Quarry Road in Apple Valley, California, has applied for a Significant Modification of a Federal Operating Permit (FOP) pursuant to the provisions of MDAQMD Regulation XII. *CEMEX* is a Portland Cement manufacturing facility 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 *CEMEX'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 December 25, 2020, to the MDAQMD, Attention: Alan De Salvio 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 Alan De Salvio, Air Quality Engineer at the address, above, or (760) 245-1661, extension 6726, or at adesalvio@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

SHERI HAGGARD
Engineering Supervisor II
Mojave Desert Air Quality Management District
14306 Park Avenue
Victorville, CA 92392

Mr. Larry Trowsdale
mchsi
951 E Skylark Ave
Ridgecrest, CA 93555

Chief, Planning Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Mr. Mike Sword
Planning Div Mgr, Clark Co Dept of Air Q and
4701 Russell Road, Suite 200
Las Vegas, NV 89118

Environmental Manager
Duffield Marine, Inc.
17260 Muskrat Avenue
Adelanto, CA 92301

Mr. Jon Boyer
High Desert Power Project LLC
19000 Perimeter Rd
Victorville, CA 92394

Ms. Carol Kaufman
Metropolitan Water District
700 N Alameda Street, 8th Floor, Rm 106
Los Angeles, CA 90012

Mr. John F. Espinoza
Principal Advisor, MP Materials
HC1 Box 224, 67750 Bailey Road
Mountain Pass, CA 92366

Chief, Bureau of Air Quality
NDCNR, Env Prot Div (Air)
901 South Stewart St, Suite 4001
Carson City, NV 89701-5249

Mr. Steve Smith
SB County Transportation Authority
1170 W. Third Street, Second Floor
San Bernardino, CA 92410

Environmental Contact
Specialty Minerals Inc.
P.O. Box 558
Lucerne Valley, CA 92356-0558

Ms. Janet Laurain
Adams Broadwell Joseph & Cardozo
601 Gateway Blvd., St. 1000
South San Francisco, CA 94080-7037

Ms. Desirea Haggard
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