

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on January 19, 2012.

Permit Number: **R30-00300006-2012**
Application Received: **12/26/2012**
Plant Identification Number: **03-54-003-00006**
Permittee: **Essroc Cement Corporation**
Facility Name: **Martinsburg**
Mailing Address: **1826 South Queen Street, Martinsburg, WV 25401**

Permit Action Number: *MM02* Revised: *July 16, 2013*

Physical Location: Martinsburg, Berkeley County, West Virginia
UTM Coordinates: 243.50 km Easting • 4369.00 km Northing • Zone 18
Directions: Take south Queen Street Exit off of WV State Route 45 at Martinsburg.
 The facility is 0.5 miles south at the end of Queen Street.

Facility Description

Essroc Cement Corporation owns and operates a cement manufacturing plant, which is characterized by SIC Codes 3241 and 1422. The plant operates a preheater/precalciner (PH/PC) kiln system that uses primary coal and petcoke. The PH/PC kiln produces cement clinker, an intermediary product of cement, which is then ground into finished cement. The nominal capacity of the plant is 2,212,890 short tons (stons) per year of clinker. Essroc uses approximately 292,110 stons of coal annually and fly ash from electric power plants. Essroc also has the ability to burn petroleum hydrocarbon contaminated soils that were generated onsite in the PH/PC cement kiln. The facility has the potential to operate twenty-four (24) hours a day, seven (7) days per week, and fifty-two (52) weeks per year.

Proposed Changes

Essroc is proposing to construct five new bag houses and modify four existing bag houses at the Plant. These nine baghouses will be used to control fugitive particulate matter from existing process equipment. No new process equipment is proposed to be constructed as part of this modification.

The following five new bag houses are proposed to be constructed to supplement existing baghouses:

- A new 6500 DSCFM pulse jet cartridge unit to control the top of the low alkali (LA) clinker storage silo. (Supplement to existing CD43.04)
- A new 8000 DSCFM pulse jet cartridge unit to control the top of the normal clinker storage silo. (Supplement to existing CD43.03)
- A new 9500 DSCFM pulse jet cartridge unit to control the normal clinker bin at the head of pan conveyor 73. (Supplement to existing CD43.14)
- A new 1,500 DSCFM pulse jet cartridge bin vent to control existing equipment associated with Finish Mill 1 Reject Elevator High Zone. (Supplement to existing CD44.07)
- A new 1,500 DSCFM pulse jet cartridge bin vent to control existing equipment associated with Finish Mill 2 Reject Elevator High Zone. (Supplement to existing CD44.10)

The following four existing bag houses are proposed to be modified:

- Existing CD45.01 – Finish Mill 1 Airslides Dust Collector will be replaced with a 4,620 DSCFM duct collector.
- Existing CD45.02 – Finish Mill 2 Airslides Dust Collector will be replaced with a 4,620 DSCFM dust collector.
- Existing CD21.12 – South Middle Bank CP Pump Dust Collector will be replaced with a 350 DSCFM dust collector.
- Existing CD21.13 – North Middle Bank CP Pump Dust Collector will be replaced with a 350 DSCFM dust collector

Emissions Summary

The table below lists the increase in potential emissions associated with this permitting action.

<i>Pollutant</i>	<i>Change in Potential Emission(+ or -), TPY</i>
PM	+13.85
PM ₁₀	+11.77
PM _{2.5}	+4.16

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 4,436.95 tpy of CO; 4,009.59 tpy of NO_x; 598.59 tpy of PM₁₀; 4,507.9 tpy of SO₂; and 156.32 tpy of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Essroc Cement Corporation is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The minor modification permitting action has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations.
	45CSR13	Construction/modification permits
	45CSR30	Operating permit requirement
	45CSR34	Emission Standards for Hazardous Air Pollutants.
	40C.F.R. 63 Subpart LLL	National Emission Standard for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry.
State Only:	None	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R14-026I	3/14/2013	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

- I. **Permit R14-026I.** Affected permit conditions have been accordingly modified as part of this permitting action. The Table below sets out the affected Title V permit conditions with a discussion detailing the changes.

Title V	Discussion of Changes
1.1 Emission Units Table	Added Control Device CD43.21 to the control devices of Emission Unit EP43.05. Added Control Device CD43.21 to the emission unit table after the control device it supplements (CD43.03). Added Control Device CD43.19 to the control devices of Emission Unit EP43.03. Added Control Device CD43.19 to the emission unit table after the control device it supplements (CD43.04).

Title V	Discussion of Changes
	<p>Added Control Device CD43.20 to the control devices of Emission Units EP43.15 and EP43.14.</p> <p>Added Control Device CD43.20 to the emission unit table after the control device it supplements (CD43.14).</p> <p>Added Control Device CD44.18 to the control devices of Emission Units EP44.07.01, EP44.07.02, and EP44.07.03.</p> <p>Added Control Device CD44.18 to the emission unit table after the control device it supplements (CD44.07).</p> <p>Added Control Device CD44.19 to the control devices of Emission Units EP44.10.01, EP44.10.02, and EP44.10.03.</p> <p>Added Control Device CD44.19 to the emission unit table after the control device it supplements (CD44.10).</p> <p>Updated the design capacity of CD45.01 and CD45.02 from 4,238 DSCFM to the new 4,620 DSCFM.</p> <p>Updated the design capacity of CD21.12 and CD21.13 from 2,000 DSCFM to the new 350 DSCFM.</p>
1.2	Changed R14-026H to R14-026I
4.1.2	Updated the allowable emissions in the table to reflect changes made in R14-026I.
4.1.39	<p>Added CD43.19, CD43.20, and CD43.21 to the table of control devices for Group 4 point sources.</p> <p>Also updated the TSP and PM₁₀ limits from 5.24 and 4.45 tons per year to 14.5 and 12.10 tons per year respectively to reflect changes made in R14-026I.</p>
4.1.43	<p>Added CD44.18 and CD44.19 to the table of control devices for Group 6 point sources.</p> <p>Also updated the TSP and PM₁₀ limits from 153.70 and 126.35 tons per year to 154.82 and 127.31 tons per year respectively to reflect changes made in R14-026I.</p>
4.1.47	Updated the TSP and PM ₁₀ limits from 63.28 and 53.83 tons per year to 67.00 and 56.99 tons per year respectively to reflect changes made in R14-026I.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR14: Permits for construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention Of Significant Deterioration.

The emission increase from this project is not “significant” as defined in 45CSR14.

This modification does not trigger PSD. Therefore the GHG Tailoring rule does not apply.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not applicable for minor modifications
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Robert Mullins
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Robert Mullins
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1243 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

The permittee was changed from Capitol Cement Corporation to Essroc Cement Corporation after submitting a name change request dated May 15, 2013.