

**TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY PERMIT NO. 75241**

Phoenix Cement Company

I. INTRODUCTION

This Class II air quality permit is issued to Phoenix Cement Company, the Permittee, for the continued operation of the flyash handling facility located at Cholla generating station in Joseph City, Arizona.

A. Company Information

1. Facility Name: Phoenix Cement Company
2. Facility Location: Arizona Power Supply- Cholla Power Plant
Joseph City, AZ 86032
3. Mailing Address: Phoenix Cement Company, P.O. Box 428
Clarkdale, AZ 86324

B. Attainment Classification

Navajo County is designated attainment/unclassified for all criteria pollutants.

II. PROCESS DESCRIPTION

A. The Phoenix Cement Company (PCC) Cholla Fly Ash facility is located within the APS near Joseph City, Arizona. Raw flyash is pneumatically transferred from APS into either the raw feed silo or the product silo. The flyash in the raw feed silo is pneumatically transferred directly into the product silo or metered into a classification system where the viable product is separated. The portion of flyash not viable is transferred back to APS. The viable flyash is stored in the product silo until it can be gravity fed into trucks or railcars for distribution. This process emits particulate matter (PM) and particulate matter with an aerodynamic diameter less than 10 microns (PM₁₀).

B. Four baghouse dust collectors with maximum rated capacities in cubic feet per minute (CFM) are used for pollution control for the PM and PM₁₀ emissions from the flyash handling process. The Raw Feed Silo is equipped with the Raw Feed Dust Collector (16,000 CFM). The Product Silo is equipped with the Product Dust Collector (21,000 CFM). The PM and PM₁₀ emissions from the final flyash distribution are controlled by the Loadout Dust Collector (4,000 CFM). The load out bin is equipped with the Nuisance Dust Collector (10,000 CFM).

III. EMISSIONS

Table 1 provides the emissions from the facility. The emissions are for the maximum annual operation of 8,760 hours per year.

**Table 1: Potential Emissions**

Pollutant	Emissions (tons per year)
PM	30.41
PM₁₀	30.41
PM_{2.5}	30.41

IV. MINOR NEW SOURCE REVIEW

This renewal permit does not involve any changes to the facility's PTE. As a result, this renewal permit does not trigger minor NSR.

V. APPLICABLE REGULATIONS

Table 2 displays the applicable requirements for each permitted piece of equipment along with an explanation of why the requirement is applicable.

Table 2: Verification of Applicable Regulations

Unit	Control Device	Rule	Discussion
Classifiers, Cyclones, and Silos	Baghouse Dust Collectors	A.A.C.R18-2-702.B	This opacity standard is applicable to all point sources of emissions.
		A.A.C.R18-2-730	This standard is applicable to all unclassified sources.
Fugitive dust sources	Water Trucks Dust Suppressants	A.A.C. R18-2 Article 6 A.A.C. R18-2-702	These standards are applicable to all fugitive dust sources at the facility.
Abrasive Blasting	Wet blasting; Dust collecting equipment; Other approved methods	A.A.C. R-18-2-702 A.A.C. R-18-2-726	These standards are applicable to any abrasive blasting operation.
Spray Painting	Enclosures	A.A.C. R18-2-702 A.A.C. R-18-2-727	This standard is applicable to any spray painting operation.
Demolition/renovation operations	N/A	A.A.C. R18-2-1101.A.8	This standard is applicable to any asbestos related demolition or renovation operations.



VI. PREVIOUS PERMIT CONDITIONS

Permit No. 59717 was issued on July 19, 2014, for the continued operation of this facility. Table 3 below illustrates if a section in Permit No. 59717 was revised or deleted.

Table 3: Permit No. 59717

Section No.	Determination		Comments
	Revised	Delete	
Att. A.	X		General Provisions - Revised to represent most recent template language.
VII	X		Compliance Certification – Will be submitted annually no later than September 15th. The report will be for the compliance status of the source for the period between August 1st of the previous year and July 31st of the current year.
Att. B			
I	X		Facility-Wide Requirements. Revised to represent most recent template language
II	X		Flyash Handling Requirements – Opacity requirements are clarified.
III	X		Fugitive Dust Requirements - Revised to reflect most recent permitting language.
IV		X	Mobile Source – Removed this section
IV	X		Other Periodic Activity Requirements - Revised to reflect most recent permitting language.

VII. MONITORING REQUIREMENTS

A. Flyash Handling Monitoring Requirements

1. Baghouse Stack Opacity

- a. A certified EPA Reference Method 9 observer must conduct a monthly survey of visible emissions emanating from the stacks of the baghouses controlling the silos, load out spouts, cyclones, and classifiers as per Condition **Error! Reference source not found.** of Attachment “B”.

2. The Permittee must keep a log of all maintenance activities performed on the baghouses.

B. Fugitive Dust

1. The Permittee is required to keep record of the dates and types of dust control measures employed.

2. The Permittee is required to show compliance with the opacity standards by having a Method 9 certified observer perform a monthly survey of visible emission from fugitive dust sources. The observer is required to conduct a 6-minute Method 9 observation if the results of the initial survey appear on an instantaneous basis to exceed the applicable standard.

3. The Permittee is required to keep records of the name of the observer, the time, date, and location of the observation and the results of all surveys and observations.



- 4. The Permittee is required to keep records of any corrective action taken to lower the opacity of any emission point and any excess emission reports.

C. Periodic Activities

- 1. The Permittee is required to record the date, duration and pollution control measures of any abrasive blasting project.
- 2. The Permittee is required to record the date, duration, quantity of paint used, any applicable MSDS, and pollution control measures of any spray painting project.
- 3. The Permittee is required to maintain records of all asbestos related demolition or renovation projects. The required records include the “NESHAP Notification for Renovation and Demolition Activities” form and all supporting documents.

VIII. COMPLIANCE HISTORY

The facility has undergone three onsite inspections during the prior permit term and no violations were noted. In addition, this facility has submitted five annual compliance certifications for review by ADEQ. No deficiencies were noted in these reports.

IX. LIST OF ABBREVIATIONS

A.A.C.	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
CFM	Cubic Feet Per Minute
MMCFD	Million Cubic Feet Per Day
PM	Particulate Matter
PM ₁₀	Particulate Matter Nominally less than 10 Micrometers
PTE	Potential-to-Emit
TPY	Tons per Year