TECHNICAL REVIEW AND EVALUATION
OF APPLICATION FOR
AIR QUALITY SIGNIFICANT PERMIT REVISION NO. 81739
AIR QUALITY PERMIT NO. 65587

I. INTRODUCTION

This Class I Significant Permit Revision No. 81739 (Revision to Permit No. 65587), authorizes Drake Cement, LLC (Drake), the Permittee, to install a new finish mill and associated equipment at its Portland cement plant located in Paulden, Arizona.

Company Information

Facility Name:	Drake Cement Plant
Mailing Address:	21803 N Scottsdale Road, Suite 220, Scottsdale, AZ 85255
Facility Location:	5001 East Drake Road, Paulden, AZ 85334

A. Attainment Classification

The facility is located in an area that is attainment or unclassified for all criteria pollutants.

II. PROCESS DESCRIPTION

A. Process Description

Drake is proposing to install a vertical mill that can be used as a backup or swing mill which will be incorporated into the existing cement plant process. The addition of the vertical mill into the process will provide redundancy or backup to the existing finish mill and raw mill processes, as well as the ability to create and store different types of finished product.

This new mill and associated equipment is set to work independently from the existing mills. The mill operates with negative pressure and includes a high efficiency separator within its assembly. The mill will use the current excess hot air from the clinker cooler for its drying function when required. The hot air used for drying, after being cooled and dedusted, will return with a new duct system and vent to the existing clinker cooler stack.

The cement plant existing conveyor system that feeds raw material, clinker, coal, gypsum, etc., includes two existing twin belts, BC-4.15 and BC-11.10, will be split into two new flow systems: 312.10.BC.01 and 612.16.BC.01, respectively. Two new bucket elevators, 312.64BE and 612.40BE, will be installed at the proposed split of each existing twin belt conveyor to divide the current flow of raw material as follows;

- The first flow will continue with the current flow of material feeding the existing 8 Metallic silos in the plant.

- The new alternative flow will redirect the material to four new steel storage silos which will feed the proposed mill. The new silos will feed proportioned amounts of raw material through a transport system consisting of a belt conveyor, bucket elevator and a second belt conveyor that will feed the new mill.

The final grinded and dry fine product is taken by the air flow from the mill that is captured by the filter of the baghouse (638.10PF). The final product is discharged and finally conveyed from the baghouse hopper using a 4-screw conveyor system (632.40.SV, 632.45.SV, 632.48.SV and 632.52.SV). For ordinary Portland cement, Type IP cement and dry and grinded pozzolan, the screw conveyors will feed a pneumatic pump (632.54.PP) which will convey the material to two new final product metallic silos, 637.60.SS and 637.62.SS, or to the existing Railroad Metallic silo. As an option, in case the temperature of the cement is too high (may occasionally occur during hot summer months), the product may be cooled by the existing cement cooler after which the final product will be pneumatically pumped into one of the new metallic silos or existing Railroad Metallic Silo. For dry and grinded raw material, a second identical pneumatic pump 632.56.PP will convey the raw meal to the existing Blending silo.

B. Control Devices

The process will be controlled by a dedicated central baghouse which will vent emissions to the existing clinker cooler stack. Three additional dust collectors are proposed which will control emissions and vent air within the vertical mill process as well as material transfer and dispatch from the proposed new finished product silos. The remainder of the proposed project transfer locations are a closed circuit whereas fully enclosed material transfer points will be controlled by an innovative conveyor filtration system (Dust Hog), where dust is returned directly back onto the material conveyance system and air is not vented to the atmosphere at the control locations.

III. COMPLIANCE HISTORY

Since the issuance of Permit No. 65587, the facility has submitted five (5) compliance certifications, and had four (4) inspections, and two Notice of Violations (NOVs). Excess emissions and permit deviations are summarized below.

A. At the time of ADEQ inspection on November 14, 2017, ADEQ inspectors observed visible emissions from the conveyor transfer system at Transfer Tower 2. ADEQ inspectors collected an Alternate Method ALT-082 opacity observation (DOCSII) from the visible emissions from the conveyor transfer system. The DOCSII opacity result was 31.87%. (Attachment "B" Condition IV.C.2)

B. At the time of ADEQ inspection on November 14, 2017, ADEQ inspectors observed visible emissions and an accumulation of fine, loose, non-compacted material around and under Transfer Tower 1 and 2, and in other areas throughout the facility. (Attachment "B" Condition XI.B.5.a(1).

C. At the time of ADEQ inspection on November 15, 2017, ADEQ inspectors observed the door for the Limestone Covered Stockpile Building was missing an internal latch. (Attachment "B" Condition VII.B.1.f)

D. At the time of ADEQ inspection on November 15, 2017, ADEQ inspectors observed visible emissions from the conveyor transfer system at Transfer Tower 1. ADEQ inspectors collected an Alternate Method ALT-082 opacity observation (DOCSII) from the visible emissions from the conveyor transfer system. The DOCSII opacity result was 26.25%. (Attachment "B" Condition IV.C.2)

E. On January 16 and 17, 2018, the roads were not vacuumed due to equipment breakdown. A new sweeper was commissioned on January 18, 2018 and road sweeping resumed on January 18, 2018. (Attachment "B" Condition XI.B.3.c(1))

F. On June 2, 2018, the roads were not watered in the Quarry due to a broken water truck that needed repairs done. The water truck was fixed June 4, 2018. No quarry operations occurred on 06/03/2018. (Attachment "B" Condition XI.B.3.c(1))

G. On July 30, 2018, the flow meter and PM CPMS on the clinker cooler broke down due to lightning. The circuit board was replaced on August 1, 2018. (Attachment "B" Condition III.E.3.a(1))

H. On February 1, 2019, the HCl emissions from the kiln stack, on a 30-day rolling average basis, was 3.04 ppmvd, and exceeded the permitted limit of 3 ppmvd @ 7% O_2 due to the use of bottom ash. Drake stopped using the bottom ash on January 21, 2019. The continued increase in HCl emissions is attributed to residual bottom ash still being circulated within the blend silo and into the kiln system. (Attachment "B" Condition III.H.1)

I. On August 16, 2019, excess opacity was observed from the ground floor of the recirculating bucket elevator in the Finish Mill circuit. Drake Cement personnel completed an official EPA Method 9 observation on the ground level where the visible emission was emanating 6 minutes at 08:11 to 08:17. The six minute opacity observation averaged 31.25%. A water spray was installed on the finish circuit clinker feed conveyor (612-16) to reduce clinker temperatures thereby eliminating the need to open the excess air damper beyond it normal operating position. (Attachment "B" Condition IV.C.2)

J. At the time of ADEQ inspection on April 29, 2019, ADEQ inspectors observed opacity from near the clinker dome and the east end of the kiln. The source provided information a bucket elevator stopped resulting in the opacity. DOCS observations near the Clinker Dome were 29.79 and 38.75% opacity, opacity near the east end of the kiln was 27.5% opacity. (Attachment "B" Condition III.E.2.a & b)

K. At the time of ADEQ inspection on May 1, 2019, ADEQ inspectors multiple conveyors with cement powder escaping the covered conveyor system and a buildup of cement powder on multiple floors under the covered conveyors in the Finish Mill building. The conveyor system are connected to dust collectors. (Attachment "B" Condition IV.D)

L. On November 4, 2019 smoldering coal smoke and vapor emanating from South End of Q storage Building. This is due to the presence of moisture the coal. On November 5, smothering coal was removed from the storage building and temporally stored outside to extinguish the smoke. The remaining coal was capped with gypsum to avoid additional smothering. Additional work is being planned to use a Dozer to compact the coal to remove all oxygen pockets from the coal. (Attachment "B" Condition VI.B.1a)

M. On January 10, 2020, an upset condition occurred during operation of the finish mill system causing bucket elevator and bin vent to emit particulate matter emission in excess of 10% opacity as measured by EPA Method 9. The bucket elevator and bin vent received additional repair during the following PM period on January 13, 2020. (Attachment "B" Condition IV.C.1)

IV. EMISSIONS

The facility has a potential-to-emit (PTE) more than the minor NSR thresholds for PM_{10} and $PM_{2.5}$. Emission factors are calculated from manufacturer minimum guaranteed specifications, BACT limits, and AP-42 emission factors. The facility's PTE is provided in Table 1 below.

Table 1: Potential to Emit

Pollutant	Pre Revision Emissions (TPY)	Emissions difference from Revision No. 81739	Post Revision Emissions (TPY)	Minor NSR Thresholds	Minor NSR Triggered?
NO_x	418.3	0	418.3	20	No
PM	146	16.32	162.32	N/A	No
PM_{10}	109.1	14.48	123.58	7.5	Yes
$PM_{2.5}$	67.8	9.53	77.33	5	Yes
CO	1,336.2	0	1,336.2	50	No
SO_2	23.1	0	23.1	20	No
VOC	39.0	0	39.0	20	No

V. MINOR NSR REVIEW

As seen in Table 1 above, Minor NSR is trigger for PM_{10} and $PM_{2.5}$ for the proposed modification. The proposed project will implement fabric filter dust control technology throughout the process. Modern dust collector design and filter media will be used to control emissions prior to being released to the atmosphere. The proposed dust collection meets reasonable available control technology (RACT) for this type of process and satisfies Minor NSR requirements.

VI. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

The applicable monitoring, recordkeeping, and reporting requirements for the equipment and processes in this permit revision are outlined below.

A. Storage Bins, Bulk Loading and Unloading Systems, and Conveying System Transfer Points

The Permittee must conduct a monthly 10-minute visible emissions test of each affected source in accordance with Method 22 of Appendix A–7 to 40 CFR 60. If visible emissions are observed during any Method 22 performance test, the Permittee is required to conduct 30 minutes of opacity observations, recorded at 15-second intervals in accordance with Method 9 of Appendix A–4 to 40 CFR 60. The Method 9 performance test must begin within 1 hour of any observation of visible emissions.

B. Vertical Mill

1. The Permittee is required to monitor the opacity by conducting daily visual emissions observations high efficiency process filter baghouse 638.10.PF in accordance with the procedures of Method 22 of Appendix A–7 to 40 CFR 60. The duration of the Method 22 performance test shall be 6 minutes.

2. Within 24 hours of the end of the Method 22 performance test in which visible emissions were observed, the Permittee is required to conduct a follow up Method 22 performance test of each stack from which visible emissions were observed during the previous Method 22 performance test.

3. If visible emissions are observed during the follow-up Method 22 performance test from any stack from which visible emissions were observed during the previous Method 22 performance test, the Permittee is required to conduct an opacity test of each stack from which emissions were observed during the follow up Method 22 performance test in accordance with Method 9 of Appendix A–4 to part 60 of this chapter. The duration of the Method 9 test shall be 30 minutes.

VII. TESTING REQUIREMENTS

The applicable testing requirements for the equipment and processes in this permit revision are outlined below.

High Efficiency Process Filter Baghouse 638.10.PF

The Permittee is required to conduct annual performance tests for PM_{10} in accordance with EPA Reference Method 5 or Method 201 or Method 201A of 40 CFR 60, Appendix A, in Conjunction with Method 202.

VIII. COMPLIANCE ASSURANCE MONITORING REQUIREMENTS

The proposed High Efficiency Process Filter Baghouse 638.10.PF is subject to compliance assurance monitoring (CAM) requirements. The CAM requirements are outlined below.

1. At the time of PM_{10} performance tests for the dust collectors, the Permittee is required to confirm the appropriateness of the opacity limits and operating limits for the baghouse pressure drop monitoring system.

2. As per the CAM plan, the Permittee is required to conduct daily opacity monitoring and continuous pressure drop monitoring across the Baghouses.

3. The pressure drop monitoring system is required to meet the performance criteria, contained in the approved CAM plans. Any changes to the approved CAM plan must be submitted to the Director. The Permittee is required to follow the current CAM plan until a revised one has been approved.

4. Excursions Determinations

a. Any opacity observed in excess of the opacity limit established in the approved CAM plan during the visible emission survey will constitutes an excursion event.

b. Each time the pressure drop across the Baghouse falls outside the range established in the approved CAM plan will constitute an excursion event.

IX. LIST OF ABBREVIATIONS

A.A.C. ..... Arizona Administrative Code
ADEQ ..... Arizona Department of Environmental Quality
Btu/ft^3 ..... British Thermal Units per Cubic Foot
Btu/hr ..... British Thermal Units per Hour
CFR ..... Code of Federal Regulations
CO ..... Carbon Monoxide
FERC ..... Federal Energy Regulatory Commissions
HAP ..... Hazardous Air Pollutant
hp ..... Horsepower
lb/hr ..... Pound per Hour
NO_x ..... Nitrogen Oxides
PM ..... Particulate Matter
PM_{10} ..... Particulate Matter Nominally less than 10 Micrometers
SO_x ..... Sulfur Oxides
VOC ..... Volatile Organic Compound

X. EQUIPMENT LIST UPDATES

Table 2: Facility Equipment List Additions

Equipment ID	Equipment Description	Capacity	Make	Model Number	Serial Number	Date of Mfg	NSPS/ NESHAP
Department 3 - Raw Material, Raw Coal, Clinker and Gypsum Metallic Silos							
617.51.SS	Low Tonnage Silo 1	2370 cu. ft.	Field Fabricated Unit	Field Fabricated Unit	NA	2020	40 CFR 63 SUBPART LLL
617.52.SS	Low Tonnage Silo 2	2370 cu. ft.	Field Fabricated Unit	Field Fabricated Unit	NA	2020	40 CFR 63 SUBPART LLL
617.53.SS	High Tonnage Silo 1	2370 cu. ft.	Field Fabricated Unit	Field Fabricated Unit	NA	2020	40 CFR 63 SUBPART LLL
617.54.SS	High Tonnage Silo 2	2370 cu. ft.	Field Fabricated Unit	Field Fabricated Unit	NA	2020	40 CFR 63 SUBPART LLL
Department 4 - RR and Truck Discharge Installation for Pozzolan, Raw Coal, Iron Ore, Limestone, Sandstone and Bauxite, Covered Storage for Pozzolan, Raw Coal, Iron Ore, Sandstone and Bauxite, Transportation to Raw Material Silos and Alternative Transportation to Primary Limestone Covered Stockpile							
322.10.BC.01	Belt Conveyor to transport additive material to Metallic Silos	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
312.10.PF03	Horizontal Pulse Jet Dust Collector	3050 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL

Equipment ID	Equipment Description	Capacity	Make	Model Number	Serial Number	Date of Mfg	NSPS/ NESHAP
312.60.BC	Belt Conveyor to transport additive material to bucket elevator	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
312.60.PF02	Horizontal Pulse Jet Dust Collector	2410 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
312.64.BE	Bucket Elevator feeding the belt conveyor to steel silos	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
312.64.PF04	Horizontal Pulse Jet Dust Collector	2660 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
312.66.DG	Two-way Diverter Gate for two belt conveyors	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.30.BC	Belt Conveyor to transport additive materials to bucket elevator	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.34.BC	Reversible Belt Conveyor to transport Clinker to belt conveyor 612.38.BC	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.16.BC.01	Belt Conveyor to transport additive materials to bucket elevator	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.16.PF03	Horizontal Pulse Jet Dust Collector	3050 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL

Equipment ID	Equipment Description	Capacity	Make	Model Number	Serial Number	Date of Mfg	NSPS/ NESHAP
612.38.BC	Belt Conveyor to transport additive materials to bucket elevator	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.38.PF02	Horizontal Pulse Jet Dust Collector	2400 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.40.BE	Bucket Elevator feeding the belt conveyor to steel silos	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.40.PF04	Horizontal Pulse Jet Dust Collector	2660 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.44.DG	Two-way Diverter Gate for two belt conveyors	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.46.BC	Belt Conveyor to transport additives, pozzolans, gypsum & clinker to steel silos	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.46.PF02	Horizontal Pulse Jet Dust Collector	2400 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.46.PF04	Horizontal Pulse Jet Dust Collector	2400 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.48.BC	Shuttle Conveyor for transporting clinker, gypsum & pozzolan to steel silos	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL

Equipment ID	Equipment Description	Capacity	Make	Model Number	Serial Number	Date of Mfg	NSPS/ NESHAP
612.48.PF04	Horizontal Pulse Jet Dust Collector	2400 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
612.48.PF06	Horizontal Pulse Jet Dust Collector	2400 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
617.51.PF01	Pulse jet silo bin vent dust collector to low tonnage Silo 1	1550 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
617.52.PF01	Pulse jet silo bin vent dust collector to low tonnage Silo 1	1550 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
617.53.PF01	Pulse jet silo bin vent dust collector to low tonnage Silo 1	1550 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
617.54.PF01	Pulse jet silo bin vent dust collector to low tonnage Silo 1	1550 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
Department 6 – Blending Silo							
632.60.PP	Pneumatic Pump for transporting raw meal to existing blending silo	121 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.60.PC01	Pneumatic Conveying Pipe for raw meal	10 inch	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
Department 13 – Cement Grinding							
631.02.WF	Low Tonnage Weigh Feeder 1	3.0-18.0 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL

Equipment ID	Equipment Description	Capacity	Make	Model Number	Serial Number	Date of Mfg	NSPS/ NESHAP
631.04.WF	Low Tonnage Weigh Feeder 2	3.0-18.0 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
631.06.WF	High Tonnage Weigh Feeder 1	33-58 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
631.08.WF	High Tonnage Weigh Feeder 2	33-58 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.12.BC	Belt Conveyor to transport material to bucket elevator 632.18.BE	35-130 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.12.BS02	Single Idler Belt Scale for belt conveyor 632.12BC	35-130 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.14.PF	Pulse Jet Filter Dust Collector	3900 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.18.BE	Bucket Elevator feeding the belt conveyor to Vertical Mill	130 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.18.PF04	Horizontal Pulse Jet Dust Collector	1550 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.20.BC	Belt Conveyor for feeding Vertical Mill 635.32.VM	35-130 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.20.MD02	Metal Detector on belt conveyor 632.20.BC	35-130 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL

Equipment ID	Equipment Description	Capacity	Make	Model Number	Serial Number	Date of Mfg	NSPS/ NESHAP
632.20.MS03	Magnetic Separator on belt conveyor 632.20.BC	35-130 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.22.PF	Pulse Jet Filter Dust Collector	2980 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.24.DG	Two-way Diverter Gate for feeding Vertical Mill	130 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.40.SV	Screw Conveyor Module 1 of Vertical Mill Baghouse for final product transport	17-59 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.45.SV	Screw Conveyor Module 2 of Vertical Mill Baghouse for final product transport	17-59 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.41.RV	Rotary Valve from Module 1 screw for final product transport to pump system	17-59 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.42.RV	Rotary Valve from Module 1 screw for final product transport to contrast unloading	17-59 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.46.RV	Rotary Valve from Module 2 screw for final product transport to pump system	17-59 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL

Equipment ID	Equipment Description	Capacity	Make	Model Number	Serial Number	Date of Mfg	NSPS/ NESHAP
632.47.RV	Rotary Valve from Module 2 screw for final product transport to contrast unloading	17-59 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.48.SV	Collecting Screw Conveyor for contrast weighing system with trucks	34-117 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.50.LS	Loading Spout for contrast final product	34-117 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.52.SV	Collecting Screw Conveyor for final product transport	34-117 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.70SS	Bypass Bin	100 cu. Ft.	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.72.BC	Bypass Belt Conveyor	17 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.72.MD02	Metal Detector on belt conveyor 632.72.BC	10-20 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.74.DG	Two-way Diverter Gate for recirculating	28 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.76.BE	Recirculating Bucket Elevator	28 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL

Equipment ID	Equipment Description	Capacity	Make	Model Number	Serial Number	Date of Mfg	NSPS/ NESHAP
635.32.RV05	Rotary Valve for feeding Vertical Mill	30-120 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
635.32.VM	Vertical Mill	30-115 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
635.32.WI04	Water Injection System	900 l/hr	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
635.34.DH	Drag Chain for reject material from Vertical Mill	28 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
638.10.PF	High Efficiency Process Filter Baghouse	111,830 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
Department 14 – Cement Transport to Silo, Cement Silo and Bulk Loading to Trucks and to Rail Cars							40 CFR 63 SUBPART LLL
632.54.PP	Pneumatic Pump for transporting cement to new cement silos	31-58 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.54.PC01	Pneumatic Conveying Pipe for cement and pozzolan	10 inch	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.56.DG	Two-way Valve	10 inch	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.56.PC01	Pneumatic Conveying Pipe for cement and pozzolan	10 inch	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL

Equipment ID	Equipment Description	Capacity	Make	Model Number	Serial Number	Date of Mfg	NSPS/ NESHAP
632.57.DG	Two-way Valve	10 inch	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.58.DG	Pneumatic Conveying Pipe for cement and pozzolan	10 inch	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
632.58.PC	Pneumatic Conveying Pipe for cement and pozzolan	10 inch	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
637.60.SS	New Metallic Silo 3B	2100 tons	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
637.62.SS	New Metallic Silo 3A	2100 tons	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
637.62.PF01	Bin Vent Dust Collector	12,500 acfm	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
722.14.LS	Loading Spout to new metallic silo 3B	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL
722.24.LS	Loading Spout to new metallic silo 3B	400 tph	TBD	TBD	TBD	2020	40 CFR 63 SUBPART LLL