

Fact Sheet



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

This Fact Sheet serves to address the changes specific to these Minor Modifications and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on October 12, 2017.

Permit Number: **R30-00300006-2017**
Applications Received: **January 24, 2018**
Plant Identification Number: **03-054-00300006**
Permittee: **Argos USA LLC**
Facility Name: **Martinsburg Plant**
Mailing Address: **1826 South Queen Street, Martinsburg, WV 25401**

Permit Action Number: *MM01 and MM02* Revised: *July 3, 2018*

Physical Location: Martinsburg, Berkeley County, West Virginia
UTM Coordinates: 243.50 km Easting • 4,369.00 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 to the end of Queen Street.

Facility Description

Argos USA LLC 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 primarily 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. Argos uses approximately 292,110 stons of coal annually and fly ash from electric power plants. Argos 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.

The purpose of MM01 is to revise opacity requirements and to increase haul road emission limits, and MM02 is for the installation of an air compressor engine.

Emissions Summary

As a result of these modifications, this facility's Potential to Emit (PTE) has increased as follows:

Plantwide Emissions Increases [Tons per Year]	
Regulated Pollutants	Potential Emissions Increase
Carbon Monoxide (CO)	6.04
Nitrogen Oxides (NO _x)	9.94
Particulate Matter (PM _{2.5})	0.35
Particulate Matter (PM ₁₀)	0.35
Total Particulate Matter (TSP)	0.35
Sulfur Dioxide (SO ₂)	2.13
Volatile Organic Compounds (VOC)	1.10

Title V Program Applicability Basis

With the proposed changes associated with these modifications, this facility maintains the potential to emit 4,464.54 tpy of CO; 4,041.69 tpy of NO_x; 585.00 tpy of PM₁₀; 4,517.63 tpy of SO₂; 159.88 tpy of VOC; 24.19 tpy of Acetaldehyde; 21.17 tpy of Hydrochloric Acid; and 67.89 tpy of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Argos USA LLC 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 modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	NSR permitting
	45CSR30	Operating permit requirement.
	45CSR34	Emission Standards for HAPs
	40CFR63, Subpart LLL	NESHAPs MACT Portland Cement Mfg.
	40CFR63, Subpart ZZZZ	RICE MACT

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the 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 (if any)
R14-0026O	March 27, 2018	

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," which may be downloaded from DAQ's website.

Determinations and Justifications

MM01

The purpose of MM01 is to revise opacity requirements and to increase haul road emission limits. These changes were addressed in R14-0026N. Existing opacity language was revised to match the language in 40CFR63, Subpart LLL in conditions 4.3.2., 4.3.12., 4.3.13., 4.3.16., 4.3.17., and 4.3.18. The haul road emission limits in condition 4.1.56 were increased. While this seems like an emissions increase, it is, in fact, a correction made to an error from R14-0026L.

MM02

MM02 is for the installation of a compressor engine, which was permitted in R14-0026O. This engine is a stand-by unit for use when the main air compressors cannot supply sufficient plant air. The engine is a 2008 Ingersoll Rand Air Compressor rated at 1600 CFM and equipped with a 2004 Cummins 4CEXL015.AAA diesel engine rated at 600HP and certified to EPA Engine Tier Level II. The only emissions from the portable air compressor are from the diesel engine combustion. Use of the portable air compressor is expected to be intermittent and therefore its operation is limited to a maximum of 3,500 hours per year.

Since the engine was built in 2004, it is subject to 40CFR63, Subpart ZZZZ, the RICE MACT. This engine is subject to the RICE MACT's requirements for a compression ignition (CI) stationary RICE with a site rating of more than 500 HP located at a major source of HAPs. The engine is not equipped with an oxidation catalyst or non-selective catalytic reduction (NSCR) control equipment.

In addition to updating the facility-wide emission limits in condition 4.1.2., Section 5.0 was added to this permit to include all applicable requirements for the compressor engine. These requirements are summarized below:

Title V Condition	Summary of Condition	Regulatory Citation	R14-0026O Condition
5.1.1.	Compressor engine emission limits	N/A	A.34
5.1.2.	3,500 hours per year operation limit	N/A	A.35
5.1.3.	CO reduction, formaldehyde limits, and minimize idle time	40CFR§63.6600(b) and Table 2a of 40CFR63, Subpart ZZZZ; 45CSR34	B.20
5.1.4.	Comply with operating limitations approved by Administrator	40CFR§63.6600(b) and Table 2b of 40CFR63, Subpart ZZZZ; 45CSR34	B.20

Title V Condition	Summary of Condition	Regulatory Citation	R14-0026O Condition
5.1.5.	Initial compliance	40CFR§§63.6630(a) and (b) and Tables 2b and 5 of 40CFR63, Subpart ZZZZ; 45CSR34	N/A
5.1.6.	General requirements	40CFR§63.6605; 45CSR34	N/A
5.1.7.	Deviations during first 200 hours of operation not violations	40CFR§63.6640(d); 45CSR34	N/A
5.1.8.	General provisions of 40CFR63, Subpart ZZZZ	40CFR§63.6665 and Table 8 to 40CFR63, Subpart ZZZZ; 45CSR34	N/A
5.2.1.	CEMS, CPMS, and minimize idle time	40CFR§§63.6625(a), (b), and (h); 45CSR34	N/A
5.2.2.	Monitoring for continuous compliance requirements	40CFR§63.6635; 45CSR34	N/A
5.3.1.	Initial performance testing and initial compliance demonstration	40CFR§63.6610(a) and Table 4 of 40CFR63, Subpart ZZZZ; 45CSR34	B.20
5.3.2.	Subsequent performance testing schedule	40CFR§63.6615 and Table 3 of 40CFR63, Subpart ZZZZ	B.20
5.3.3.	Performance test procedures, calculations, and petition for establishment of operating limitations	40CFR§63.6620; 45CSR34	B.20
5.3.4.	Testing and monitoring for continuous compliance	40CFR§63.6640(a) and Table 6 of 40CFR63, Subpart ZZZZ; 45CSR34	N/A
5.4.1.	Records of notifications, reports, malfunctions, tests and performance evaluations, and CEMS/CPMS operation	40CFR§§63.6655(a), (b), and (d); 45CSR34	N/A
5.4.2.	Form and duration of records	40CFR§63.6660; 45CSR34	N/A
5.5.1.	Notification of Compliance Status	40CFR§63.6630(c); 45CSR34	N/A
5.5.2.	Deviation reporting	40CFR§§63.6640(b) and (e); 45CSR34	N/A
5.5.3.	Notifications	40CFR§§63.6645(a), (c), (g), and (h); 45CSR34	N/A
5.5.4.	Report contents and deadlines	40CFR§§63.6650(a)-(f); 45CSR34	N/A

Non-Applicability Determinations

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

40 CFR 60 Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines: The diesel-fired 4CEXL015.AAA engine for the air compressor is not subject to this subpart because the engine was manufactured before July 11, 2005.

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: N/A
Ending Date: N/A

Point of Contact

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

Rex Compston, P.E.
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Division of Air Quality
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Charleston, WV 25304
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478
Rex.E.Compston@wv.gov

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.

Response to Comments (Statement of Basis)

Not applicable.