

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 March 14, 2023.

Permit Number: **R30-00300006-2023**
Application Received: **December 19, 2022**
Plant Identification Number: **03-54-003-00006**
Permittee: **Argos USA LLC**
Facility Name: **Martinsburg Plant**
Mailing Address: **1826 South Queen Street, Martinsburg, WV 25401**

Permit Action Number: *MM01* Revised: *January 16, 2024*

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 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 Code 3241. 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 combine certain emission limits and increase the permitted throughput of Finish Mill Limestone as permitted under modification permit R14-0026Q.

Emissions Summary

This modification results in the following increase in emissions:

Plantwide Emissions Changes [Tons per Year]	
Regulated Pollutants	Potential Emissions Increase
Particulate Matter (PM _{2.5})	1.77
Particulate Matter (PM ₁₀)	6.81
Total Particulate Matter (TSP)	15.66

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 4,464.54 tpy of CO; 4,041.69 tpy of NO_x; 592.03 tpy of PM₁₀; 4,517.63 tpy of SO₂; 159.88 tpy of VOC; 28.78 tpy of Acetaldehyde; 14.93 tpy of Formaldehyde; 21.17 tpy of Hydrochloric Acid; 13.20 tpy of Naphthalene; 21.15 tpy of Xylenes and 127.47 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's Martinsburg Plant 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:

45CSR7	To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR30	Requirements For Operating Permits

State Only:

N/A

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

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R14-0026Q	September 6, 2023	

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

The revisions made in association with this minor modification incorporate the revisions made in R13-0026Q Modification Permit which revises the overburden and limestone storage and handling operations at the Martinsburg facility for needed operational flexibility. Several changes have also been made to the boilerplate of the permit which are not associated with the R14-0026Q changes. The boiler plate revisions are a result of the revised Rule 30 (45CSR30), effective on March 31, 2023. Revisions to the Title V permit includes the following:

1) Title V Boilerplate changes.

- Condition 2.1.3. – Revised to remove the word “such” and the Rule 30 citation from §2.12 to §2.39.
- Condition 2.17. – Deleted and marked as “Reserved”.
- Condition 3.5.4. – Revised since the revised Rule 30 no longer requires the submittal of certified emissions statements.
- Condition 3.5.7. – Deleted and marked as reserved.
- Condition 3.5.8.a.1. – Deleted and marked as reserved.
- Condition 3.5.8.a.2. – Revised to replace “telefax” with “email.”

2) Section 1.1. - Emission Units Table

- Revised the design capacities for the following emission units: EP0X.03.02, EP0X.03.03, EP37.07, EP37.09, EP37.10, EP37.12, EP26.07.01, EP26.07.02, EP25.03, EP25.18 and EP25.19.
- Added Emission unit EP37.16 - *Outdoor Finish Mill Limestone Storage Pile.*

3) Section 1.2. - Active R13, R14, and R19 Permits Table - Updated R14-0026P to R14-0026Q and updated the date of issue.

4) Section 4.0.

- Revised the following permit conditions in conjunction with the revisions in R14-0026Q: 4.1.2., 4.1.4., 4.1.8., 4.1.37., 4.1.49.

Non-Applicability Determinations

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

None.

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

Point of Contact

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

Frederick Tipane
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
304/414-1910
frederick.tipane@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.