

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

SITE OPERATING PERMIT (SOP) RENEWAL

Permit #:	O1119	Company:	Lone Star Industries, Inc.
Project #:	14636	Site:	Maryneal Cement Plant
Account #:	ND-0014-S	Application Area:	Maryneal Cement Plant
Regulated Entity #:	RN100220847	Customer #:	CN600363683
Region:	3	County:	Nolan
SIC Code:	3241	SIC Name:	Cement, Hydraulic
Permit Reviewer:	Natalia Escobedo		

SITE INFORMATION

Physical Location: 202 County Road 306, 3/4 miles north of Maryneal
Nearest City: Maryneal
Major Pollutants: VOC, SO₂, PM, NO_X, CO
Additional FOPs: None

PROJECT SUMMARY

Lone Star Industries, Inc., Maryneal Cement Plant is a cement facility subject to 30 TAC Chapter 122. The Federal Operating Permit (FOP) was issued on July 29, 2005 and a timely renewal application was received on December 21, 2009. Significant emission units at the site include conveyors, kilns, clinker coolers and process heaters, which are subject to State and/or Federal Regulations. Several emission units are subject to Periodic Monitoring and the requirements are identified in the FOP. Also included in the permit are general and special terms and conditions and unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP-SUMR, OP-REQ1, OP-MON, and various UA forms).

PROCESS DESCRIPTION

The raw material is mined on-site and transported to a limestone hopper. The limestone is passed through a series of crushers to achieve the desired size material for cement manufacturing. Additional raw material used in the process include a silica source (sand, ceramic scrap), an iron oxide source (mill scale, iron ore) and an alumina source (clay, fly ash) to create the desired mix before processing. The mix is passed through a series of separators to remove material that is the desired size and storing it in silos. Natural gas is used to heat the air for the raw mill separators to dry the raw material. Milled materials are pneumatically conveyed to the raw blend silos which feed bucket elevators that raise the material to feed silos for the processing kilns. The material is fed down through a pre-heater and contacted with hot exhaust gases from the kiln. The cement kiln is coal-fired. In the kiln, the material is physically transformed through calcination and clinkerization into cement clinker. The clinker is cooled and transferred to the clinker storage building. The clinker is then combined with gypsum and anhydrite to produce Portland cement and transported to cement storage silos. From the cement storage silos, the cement is loaded into railcars, trucks or packaged for sale.

TECHNICAL REVIEW

Working Draft Permit (WDP) Preparation

1. Was Periodic Monitoring (PM) required and included in the WDP?..... Yes

2. Was Compliance Assurance Monitoring (CAM) required and included in the WDP?..... No
3. Was PM or CAM included in the permit customized for site operations?.....Yes
4. Were Special Terms and Conditions pertaining to the mass emissions cap and trade Program (for Houston/Galveston area only) included in the WDP?..... NA
5. Was a permit shield requested?..... Yes
6. If permit shield was requested, was any permit shield request denied?..... Yes
7. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirements..... Yes
 - (b) Customized Special Terms and Conditions..... No
 - (c) Manual changes to the IMS-generated applicable requirements..... No
 - (d) Alternate means of compliance for any emission unit/source at the site..... No
8. Is the site subject to the requirements of 40 CFR Part 72 (Acid Rain Permit)?..... No

Permit reviewer notes:

Periodic Monitoring (PM) was included in the WDP for kilns C-1, C-2, and C-3 for 30 TAC Chapter 111, Visible Emissions. Case-by-case PM was included for GRPCOAL for PM (Opacity), subject to NSPS, Subpart Y and for GRPALTBIN (unit ID: A-19) subject to NSPS, Subpart OOO. The case-by-case PM included using test Method 22 and a 1-minute averaging period based on MACT LLL monitoring requirements used for other emission units at the site. This monitoring was reviewed and approved by the CAM/PM technical specialist.

Permit shields for 40 CFR Part 64, CAM and 40 CFR 60, Subpart Kb were reviewed and added to the WDP.

Emission units A-2, A-4, A-19, and A-9B were in the permit with MACT, Subpart LLL applicable requirements. However after a rule interpretation and rule amendment to clarify applicability the emission units are not subject to this rule. Instead emission unit A-19 is subject to NSPS, Subpart OOO and manual built applicable requirements were added because updated RRT was not available and the logic was removed from the IMS. The applicant submitted form OP-REQ3 and unit attributes in order to facilitate the addition of these applicable requirements. Units A-2, A-4, and A-9B do not have applicable requirements for NSPS, Subpart OOO.

The applicant submitted several emission units in groups in the OP-SUMR form, however due to differing applicable requirements these groups were not maintainable and were removed from the permit. The technical contact did not agree with the reasons for this but agreed to change the representations of the groups.

Working Draft Permit Review

1. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... Yes
2. Will the draft permit be sent to public notice with unresolved issues (i.e., disagreements with applicant)?..... No

Permit reviewer notes:

The following comments were received from the applicant on 5/26/2010:

- Add Special Term and Condition for outdoor burning 30 TAC 111.201
- Remove Special condition 30 TAC 117.3200 for, distributors, retailers and installers of natural gas-fired water heaters, boilers, and process heaters
- Change wording of Special term and condition regarding maintaining records
- Requests the option to maintain the most recent two years of records onsite while the remaining three years of records is able to be maintained offsite listed in the Special Terms and conditions.

- Correct main standard applicable requirements table and periodic monitoring summary for GRPCOAL subject to NSPS, Subpart Y and Periodic Monitoring text in monitoring summary.
- Correct the main standard for GRPALTBIN (A-19), the OP-REQ3 in the application identified the incorrect citation.
- Add additional applicable requirements for GRPKILN1, GRPKILN2, and GRPKILN3 for MACT LLL two different main standards. Correct control device ID's and deviation limit for these groups in Periodic Monitoring summary.
- Several clarification questions were also asked regarding classification of citations in the applicable requirements summary table, these were addressed.

All changes requested were made except for changing the Special Terms and conditions for recordkeeping and removing applicable requirements requested in various comments, see permit file for further details.

The representation of the applicable requirements for GRPKILN, index no. 63LLL-1 and 63LLL-2 were discussed throughout review. The tech contact did not agree with listing identical requirements twice for two main standards. This was discussed and no changes were made but it was made clear that they did not agree with the representation in the permit.

Periodic Monitoring was also added for GRPALTBIN (Unit ID: A-19) for NSPS, Subpart OOO.

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP.

The Statement of Basis was prepared on 7/29/2010.

The Statement of Basis GroupWise Document # (OPDP Database) is 58171.

Compliance History Review

In accordance with 30 TAC Chapter 60, the compliance history was reviewed on 3/31/2010.

The compliance history review evaluated the period from 12/21/2009 to 12/21/2004.

Site rating: 2.31 average Company rating: 2.97 average

(High < 0.10; Average > 0.10 and < 45; Poor > 45)

Site/Permit Area Compliance Status Review

1. Were there any out-of-compliance units listed on Form OP-ACPS?..... No
2. Is a compliance plan and schedule included in the permit?..... No

Public Notice Information

1. Were comments received from the applicant after the draft permit was mailed and before Public Notice was published?..... No
2. Was a revised draft permit or public notice authorization package (PN-Errata) sent for any reason?..... No
3. Publication date: 9/21/2010 Newspaper name: Sweetwater Reporter
4. Was bilingual public notice published?..... NA
 - (a) Publication date: Newspaper name:
5. Were comments received during Public Notice period?..... No
 - (a) Was a public hearing requested?..... No
 - (b) Was a public hearing held?..... No
 - (c) Was the public hearing request withdrawn?..... No
 - (d) Was permit content changed as a result of any public comments?..... No

6. Was re-publication necessary?..... No

Permit reviewer notes:

On 10/27/2010 the Chief Clerk's database was checked no comments were received.

EPA Review

- 1. Did EPA comment on the draft permit?..... No
- 2. Was a separate NOPP - Notice of Proposed Permit sent to the EPA?..... No
 - (a) If yes, did the EPA comment on the proposed permit?..... No
- 3. Were any changes made to the permit after the EPA Review Period?..... No
 - (a) If yes, were these changes made within the 60 day Public Petition Period?..... No

Permit reviewer notes:

The Chief Clerk's database was checked on 11/19/2010, no comments were received.

IMPORTANT MILESTONES

Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	12/21/2009	
Date Project Received by Engineer	2/5/2010	
Technical Review Period	2/16/2010	8/13/2010
Working Draft Permit Reviewed by Applicant	4/27/2010	5/27/2010
Date PNAP/Draft Permit Mailed	8/24/2010	
Public Notice Comment Period	9/21/2010	10/21/2010
EPA Review Period	9/28/2010	11/12/2010
Date Sign Posting Certification Received	10/27/2010	

Milestone (Optional)	Start Date	End Date
Deficiency Cycle 1		
Deficiency Cycle 2		
Request for Comments on Compliance Plan		
Date Comment on Draft Permit Received from Public		
Date comment on Draft Permit Received from EPA		
Date Public Hearing Requested		
Date Public Hearing Held		

EFFECTIVE PERMIT ISSUANCE DATE: 11/30/2010

Natalia Escobedo Date
Permit Reviewer
Operating Permits Section
Air Permits Division

Javier Maldonado, P.E. Date
Team Leader
Operating Permits Section
Air Permit Division

ATTACHMENTS

Administrative Data
Communication Log

ADMINISTRATIVE DATA

Responsible Official:

Lawrence L. Hoffis
Senior Vice President -Operations
Lone Star Industries Inc
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Indianapolis, IN 46290

Duly Authorized Representative:

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Sweetwater, TX 79556

Technical Contact:

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Permit Consultant:

<Name>
<Title>
<Company>
<Address>
Phone: <Phone>
Email: <Email>

COMMUNICATION LOG

Company Name	Application Area	Air Account Number	Regulated Entity Number	IMS Project Number
Lone Star Industries, Inc.	Maryneal Cement Plant	ND-0014-S	RN100220847	14636

Contact	Phone/E-mail	Date	Notes
Paul Lauterbach	paul.lauterbach@buzziunicemusa.com	2/22/2010	Intro email sent to applicant requesting updates to application.
Adam Swercheck	610-882-5025	3/2/2010	Spoke with a tech contact regarding the requests from the intro email.
Adam Swercheck	610-882-5025	3/3/2010	Discussed further the requests from the intro email regarding the grouping of emission units.
Adam Swercheck	adam.swerchek@buzziunicemusa.com	3/16/2010	Sent an email requesting update to forms that were incorrect.
Adam Swercheck	adam.swercheck@buzziunicemusa.com	3/29/2010	Sent an email regarding NSPS, OOO applicable requirements.
Adam Swercheck	adam.swercheck@buzziunicemusa.com	8/13/2010	Discussed the changes to the permit.