

FEDERAL OPERATING PERMIT - TECHNICAL REVIEW SUMMARY

SITE OPERATING PERMIT (SOP) RENEWAL

Permit #:	01108	Company:	Lhoist North America of Texas, LLC
Project #:	35929	Site:	Clifton Lime Plant
Regulated Entity #:	RN100219856	Application Area:	Clifton Lime Plant
Region:	9	Customer #:	CN605752088
NAICS Code:	32741	County:	Bosque
Permit Reviewer:	Tusar R. Swami, P.E.	NAICS Name:	Lime Manufacturing

SITE INFORMATION

Physical Location: 2861 FM 2602
Nearest City: Clifton
Major Pollutants: CO, NOX, PM, SO2
Additional FOPs: None

PROJECT SUMMARY

Lhoist North America of Texas, LLC's Clifton Lime Plant site is a lime manufacturing facility and subject to the requirements of 30 TAC Chapter 122. The Federal Operating Permit (FOP) was renewed on May 8, 2019 followed by a minor revision in August 2022. A timely renewal application was received by TCEQ on November 6, 2023. Significant emission sources at the site include a coal preparation plant, loading and unloading operations, various stationary/process vents, mineral processing plant, and engines, which are subject to State and/or Federal regulations. The FOP includes general and special terms and conditions and unit-specific applicable requirements which were identified using information provided by the applicant in various forms (OP1, OP-2, OP-PBRSP, OP-ACPS, OP-REQ1, and Public Involvement Plan).

This permit has an Appendix B for NSR 4335A/PSDTX31M1 issued on August 13, 2021, and NSR 8434/PSDTX441M2 issued on September 14, 2021.

PROCESS DESCRIPTION

The Clifton Lime Plant consists of two rotary kilns and one two-shaft, parallel-flow regenerative kiln, commonly called a Maerz kiln. Also associated with the Clifton Lime Plant is a limestone quarry, raw materials handling system, fuel handling system, an atmospheric hydrator, product handling and load-out system, and associated bulk storage silos, stockpiles, etc.

Raw limestone is obtained from a quarry located on the property. Raw limestone is crushed and screened before entering the raw material handling system. Coal and coke are brought to the Clifton Lime Plant via truck. The Clifton Lime Plant includes three lime kilns which are controlled by scrubbers. Lime produced by the kilns travels to coolers where blending and storage occurs. Lime may be stored for a period of time or may be bagged and shipped right away. The Clifton Lime Plant has several small tanks for oil, used oil and fuel storage.

TECHNICAL REVIEW

Permit Content Summary

1. Was Periodic Monitoring (PM) required and included in the permit?..... Yes
2. Was Compliance Assurance Monitoring (CAM) required and included in the permit?..... Yes
3. Was case-by-case PM or CAM included in the permit?..... Yes
4. Was a permit shield requested?..... Yes
5. If a permit shield was requested, was any permit shield request denied?..... No
6. Identify if the following are applicable for this project:
 - (a) Manually-built applicable requirements..... No
 - (b) Customized Special Terms and Conditions..... Yes
 - (c) Manual changes to the IMS-generated applicable requirements..... No
 - (d) Alternate means of compliance for any emission unit/source at the site..... No
7. Is the site subject to the requirements of 40 CFR Part 72 (Acid Rain Permit)?..... No
8. Did the applicant's review/comments on the working draft permit result in changes to the permit content?..... No
9. Will the draft permit be sent to public notice with unresolved issues

(i.e., disagreements with applicant)?..... No

Permit reviewer notes:

- Additional monitoring requirements CAM and PM which were approved in an earlier project are carried forward. Only one new PM is added.
 - o KILN-2, KILN-3 - 30 TAC Chapter 111, Nonagricultural Processes – CAM-FF-003
 - o KILN-1 - 30 TAC Chapter 111, Nonagricultural Processes – Case-by-case CAM – previously approved and carried forward.
 - o 1214 - 40 CFR Part 60, Subpart Y –
 - * For pollutant PM – PM-P-001
 - * For pollutant PM (Opacity) – PM-P-033 (new)
 - o GRPCOALSYS - 40 CFR Part 60, Subpart Y – PM (Opacity) - PM-P-033
 - o GRPNEWBC, GRPUGBC - 40 CFR Part 60, Subpart OOO - PM-P-033
- Permit shields from the effective permit are carried forward. No new permit shields are added.
- In the Special Terms and Conditions, the customized term with reference to 30 TAC Chapter 113 is carried forward for 40 CFR Part 63, Subpart ZZZZ.
- Special term and condition number 12 (IMS B.142) was customized to identify the current project number and submittal date on Form OP-PBRSUP.
- The applicant reviewed the working draft permit and provided comments in emails dated March 20 and April 4, 2024 (included in permit file). During this comment period the applicant accepted the new PM option (pollutant PM (Opacity)) for unit ID 1214.

Statement of Basis

A Statement of Basis sets forth the legal and factual basis for the applicable requirements that are included in the FOP. A Statement of Basis was prepared for this project and is included in the permit file.

Compliance History Review

1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on **May 22, 2024.**

Site rating: **1.59 / Satisfactory** Company rating: **0.54 / Satisfactory**

(High < 0.10; Satisfactory ≥ 0.10 and ≤ 55; Unsatisfactory > 55)

2. Has the permit changed on the basis of the compliance history or site/company rating?..... No

Permit reviewer notes:

None

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

Permit reviewer notes:

None

Delinquent Fee Check

1. The delinquent fee check was performed on **May 22, 2024.**

2. Were there any delinquent fees owed? No

Permit reviewer notes:

None

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: **July 10, 2024,** Newspaper name: **Bosque County Record-Tribune**

4. Was bilingual public notice published?..... No
Publication date: N/A Newspaper name: N/A

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:

Chief Clerk's database was checked on 09/04/2024 to verify that no public comment was 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
 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
 If yes, were these changes made within the 60 day Public Petition Period?..... No

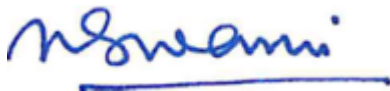
Permit reviewer notes:

Chief Clerk's database was checked on 09/04/2024 to verify that no EPA comment was received.

IMPORTANT MILESTONES

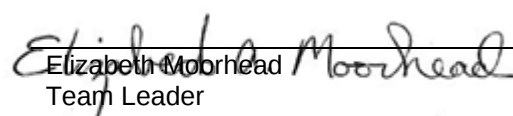
Milestone (Standard)	Start Date	End Date
Date Application Received by TCEQ	11/06/2023	
Date Project Received by Engineer	11/29/2023	
Technical Review Period	02/29/2024	05/23/2024
Working Draft Permit Reviewed by Applicant	02/29/2024	03/20/2024
Date PNAP/Draft Permit Mailed	06/13/2024	
Public Notice Comment Period	07/10/2024	08/09/2024
EPA Review Period	07/16/2024	08/30/2024
Date Sign Posting Certification Received	08/13/2024	

EFFECTIVE PERMIT ISSUANCE DATE: September 11, 2024



Tusar R. Swami, P.E.
Permit Reviewer
Operating Permits Section
Air Permits Division

09/04/2024
Date



Elizabeth Moorhead
Team Leader
Operating Permits Section
Air Permit Division

09/04/2024
Date

CONTACT INFORMATION

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