From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Friday, November 15, 2024 12:23 PM
To: Robert Hunter
Cc: Pineda, Antonio
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant
Attachments: Updated OP-REQ1 Pages 1-2 11.15.2024.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Hunter,

I apologize for being unable to get you the updated OP-REQ1 earlier in the week like I said on Friday, November 8, 2024. The document would just not work with me, so I had to get Antonio Pineda to update it. Please let me know if the document requires any further modification.

I would like to mention that I was unable to void NSR Permit 5918A since it is listed as part of an open project. I am unaware of any open project regarding NSR Permit 5918A. Due to this though, how would you like to proceed?

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Friday, November 15, 2024 9:49 AM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Good morning Hannah,

When do you plan on submitting the updated OP-REQ1? Please let me know by COB today. Please submit the updated OP-REQ1 form by or before **11/22/2024.**

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at Where to Submit FOP Applications and Permit-Related Documents.

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Best Regards,

Robert P. Hunter
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-1244

How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Wednesday, October 30, 2024 11:55 AM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Dear Mr. Hunter,

That is perfect. Can we do Friday at 2:00PM? Thank you so much.

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Wednesday, October 30, 2024 10:00 AM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hey Hannah,

I'm free Friday afternoon. How does that work?

Regards,

Robert Hunter (x1244)
Title V Permit Reviewer

From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Wednesday, October 30, 2024 9:56 AM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Dear Mr. Hunter,

Would you possibly be free on Friday, November 1, 2024?

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Wednesday, October 30, 2024 8:50 AM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>

Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hey Hannah,

Yes that sounds good. I am free tomorrow. What time works for you?

Best Regards,

Robert P. Hunter
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-1244

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Tuesday, October 29, 2024 4:53 PM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Good Evening, Mr. Hunter,

Can we please schedule a call in regards to I.A.4, I.C.2, and I.C.3? I have some questions in regards to these statements that I think would just be easier to discuss over the phone. Thank you.

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Wednesday, October 23, 2024 4:04 PM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hi Hannah,

Please provide the necessary updates listed below by **10/30/2024**:

- It does not appear that all stationary vents are listed in the Applicable Requirements Summary Table. Would you like to add all of the vents on site? If not, please update your answer to I.A.4 on the OP-REQ1 and the Chapter 111 Special Term and Condition will be included in the permit, as it is in the current, effective permit.
- For Section I.C on the OP-REQ1, I.C.2 and I.C.3 should be answered "NO" because there are no vents with additional monitoring requirements in the permit. Sorry for any confusion from my previous email.
- To answer your final question, yes the HAPS placeholder will be changed to OPACITY.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at Where to Submit FOP Applications and Permit-Related Documents.

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Robert P. Hunter
Title V Permit Reviewer
OA/Air Permits Division/OP Section
MC-163, P.O. Box 13087
Austin, TX 78711-3087
robert.hunter@tceq.texas.gov

Phone: (512) 239-1244
Fax: (512) 239-1400

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Tuesday, October 1, 2024 5:54 PM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Good Evening, Mr. Hunter,

After further review, I have the following questions/comments:

- Based on my review, I do believe that the answer for I.A.4 should be "YES". All opacities for stationary vents are addressed on a unit specific basis. Not all of them have a 20% opacity due to being constructed after January 31, 1972. For instance, the finish mills have an opacity of 10%. Can you further explain why you believe this answer is incorrect?
    - I.C.3 was answered as "YES", but I.C.4 was answered as "NO". Did you mean I.A.3-I.A.4? If so, accepting the requirements of stationary vents constructed after January 31, 1972 for vents constructed on/before January 31, 1972, just means that the sources have an opacity of 20% instead of 30% which is what the plant goes by. Accepting the requirements of stationary vents constructed after January 31, 1972, does not require them to have CAM or PM requirements.
- After a thorough review of standard permit 122312 and NSR Permit 5918A, it has been determined that both of these permits need to be voided. Since the authorized representative for the plant nor I have voided an application before on STEERS, it might take the plant a few days to figure out how to void these said permits.
- I am not exactly sure I understand this statement. Does this just mean that the HAPS placeholder will be changed to OPACITY?

Thank you so much.

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365

Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Friday, September 20, 2024 11:48 AM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hey Hannah,

After further review of the renewal application for Lone Star Industries, Inc., Maryneal Cement Plant, more information is required to complete the renewal application. Please provide the following information by **09/30/2024**:

- OP-REQ1 – Question I.A.4 was answered "YES" in the renewal application but it doesn't appear that all of the vents on site have been submitted with unit-specific requirements. Please update your answer for I.A.4.
    - Questions I.C.3-4 were answered "YES" in the renewal application, but there are no vents with CAM or PM requirements. These should be answered "NO". Please update your responses to questions I.C.3-4 and submit an updated OP-REQ1.
- Standard Permit 122312 and NSR Permit 5918A are still active. Please void these permits or include them on OP-REQ1 page 87 and submit an updated copy.
- The low-level citations from the current permit for MACT LLL will be carried over replacing the High level requirement. After the OP-REQ1 is updated, I will send an updated Working Draft Permit.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at Where to Submit FOP Applications and Permit-Related Documents.

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Robert P. Hunter
Title V Permit Reviewer

OA/Air Permits Division/OP Section
MC-163, P.O. Box 13087
Austin, TX 78711-3087
robert.hunter@tceq.texas.gov

Phone: (512) 239-1244
Fax: (512) 239-1400

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From: Robert Hunter
Sent: Thursday, September 19, 2024 4:06 PM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: OP-CRO1 - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hey Hannah,

Yes, the plant manager will need to sign a different OP-CRO1 and that is the one you will mail to me.

Best Regards,

Robert P. Hunter
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-1244

How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Thursday, September 19, 2024 4:05 PM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: OP-CRO1 - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Dear Mr. Hunter,

Upon these updates to the permit/application for the Title V renewal, will the plant manager have to sign a different OP-CR01? If so, is that the one that I will be mailing to you?

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Thursday, September 19, 2024 3:58 PM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: OP-CRO1 - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hey Hannah,

Hold off on mailing the hardcopy for now. There are a few updates that need to be made to the permit/application before it is complete. I will request those items as soon possible. Thank you for your cooperation.

Best Regards,

Robert P. Hunter
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-1244

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Thursday, September 19, 2024 3:51 PM

To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: OP-CRO1 - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Dear Mr. Hunter,

Attached to this email is the OP-CR01 for the Title V Permit Renewal Revisions that was signed by the plant manager yesterday. I shall be mailing off the hardcopy with his ink signature today. Please let me know if you need anything else.

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Thursday, September 12, 2024 10:06 AM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: OP-CRO1 - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Ms. Hannah Harris,

Please submit form OP-CRO1 by **09/19/2024** to certify the updated forms submitted during the application process. A time period of 12/05/2023 to 08/23/2024 should be used to cover the information submitted during review and the Submittal Type should be marked: *Update to Permit Application*. Please provide an electronic copy of the form followed by a hard copy. Once the form is received the project will be reviewed by my management and then the public notice package will be sent out if there are no issues.

Please let me know if you have any questions.

Sincerely,

Robert P. Hunter
Title V Permit Reviewer
OA/Air Permits Division/OP Section

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

Date:	May 2, 2023
Permit No.:	O1119
RN No.:	100220847

For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

Form OP-REQ1: Page 1			
I.	**Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter**		
	A.	**Visible Emissions**	
♦	1.	The application area includes stationary vents constructed on or before January 31, 1972.	☒YES ☐NO
♦	2.	The application area includes stationary vents constructed after January 31, 1972. *If the responses to Questions I.A.1 and I.A.2 are both "NO," go to Question I.A.6.* *If the response to Question I.A.1 is "NO" and the response to Question I.A.2 is "YES," go to Question I.A.4.*	☒YES ☐NO
♦	3.	The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972.	☒YES ☐NO
♦	4.	All stationary vents are addressed on a unit specific basis.	☐YES ☒NO
♦	5.	Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area.	☒YES ☐NO
♦	6.	The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	☒YES ☐NO
♦	7.	The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A).	☒YES ☐NO
♦	8.	Emissions from units in the application area include contributions from uncombined water.	☒YES ☐NO
♦	9.	The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30 TAC § 111.111(c).	☐YES ☒NO ☐N/A

Date:	May 2, 2023
Permit No.:	O1119
RN No.:	100220847

For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

Form OP-REQ1: Page 2				
I.	**Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)**			
	B.	**Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots**		
	1.	Items a - d determines applicability of any of these requirements based on geographical location.		
♦		a.	The application area is located within the City of El Paso.	☐YES ☒NO
♦		b.	The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	☐YES ☒NO
♦		c.	The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	☐YES ☒NO
♦		d.	The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988.	☐YES ☒NO
		If there is any "YES" response to Questions I.B.1.a - d, answers Questions I.B.2.a - d. If all responses to Questions I.B.1.a-d are "NO," go to Section I.C.		
	2.	Items a - d determine the specific applicability of these requirements.		
♦		a.	The application area is subject to 30 TAC § 111.143.	☐YES ☐NO
♦		b.	The application area is subject to 30 TAC § 111.145.	☐YES ☐NO
♦		c.	The application area is subject to 30 TAC § 111.147.	☐YES ☐NO
♦		d.	The application area is subject to 30 TAC § 111.149.	☐YES ☐NO
	C.	**Emissions Limits on Nonagricultural Processes**		
♦	1.	The application area includes a nonagricultural process subject to 30 TAC § 111.151.		☒YES ☐NO
	2.	The application area includes a vent from a nonagricultural process that is subject to additional monitoring requirements. *If the response to Question I.C.2 is "NO," go to Question I.C.4.*		☐YES ☒NO
	3.	All vents from nonagricultural process in the application area are subject to additional monitoring requirements.		☐YES ☐NO

From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Friday, August 23, 2024 5:04 PM
To: Robert Hunter
Cc: Pineda, Antonio
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Hunter,

Upon completing my review of the WDP final, I have no further comments.

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Thursday, August 22, 2024 9:19 AM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hey Hannah,

Yes, you may have until the end of the day on Friday, August 23. Thank you for letting me know. Let me know if you have any questions or concerns.

Best Regards,

Robert P. Hunter
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-1244

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Wednesday, August 21, 2024 5:30 PM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Dear Mr. Hunter,

Ever since coming back from bereavement for my grandfather, I have been trying to play catch up. Furthermore, I have had stack testing that has taken up the majority of my time over the last two weeks. Finally, I am starting to catch back up and I was hoping to go through the Title V permit tomorrow or Friday. I know that my boss has already gone through it again and has informed me that everything that needed to be removed was removed. Can you please just give me until the end of day on Friday, August 23 to just personally do a thorough check to make sure everything is correct? Thank you for your patience through this endeavor, Mr. Hunter.

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Tuesday, August 20, 2024 2:26 PM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Good afternoon Hannah,

Have you had a chance to review the Working Draft Permit(WDP)? Please let me know if you have any comments on the WDP, or when you will finish your review by COB tomorrow **08/21/2024**.

Best Regards,

Robert P. Hunter
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-1244

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Friday, July 19, 2024 3:27 PM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Dear Mr. Hunter,

I understand that TCEQ has a certain time frame for getting permits out to facilities and I also understand that this permit is way past that timeframe. However, I have had an extraordinarily hard year. My grandfather died unexpectedly on Tuesday, July 16th and my mother has completely fallen apart. With that being said, my week has been a whirlwind since Tuesday and I have not had an opportunity to look at this final WDP. Would you mind extending the comment period? Thank you.

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Friday, July 12, 2024 4:19 PM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hey Hannah,

I have attached an updated copy of the WDP. When reviewing the WDP, please only review the removal of the emission units below. Please review the attached WDP and submit any comments you have by **July 19, 2024.**

I am ok with the approach you ask about below. Let me know if you have any questions. Thank you for your cooperation.

Sincerely,

Robert P. Hunter
Title V Permit Reviewer
OA/Air Permits Division/OP Section
MC-163, P.O. Box 13087
Austin, TX 78711-3087
robert.hunter@tceq.texas.gov

Phone: (512) 239-1244
Fax: (512) 239-1400

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Friday, June 28, 2024 2:14 PM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Schell, Paul <Paul.Schell@Buzziunicemusa.com>; Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Dear Mr. Hunter,

I am deeply sorry about the long wait time. I was under the belief that I had already sent this to you. However, between training, stack testing, the TRI report, and the P2 report, the email must have gotten lost in the chaos. Please see the sources that the Buzzi Unicem USA: Maryneal Plant would like to remove due to either being a duplicate, no longer existing, or never being built:

1. A-28 Overland Conveyor Transfer to Raw Material Storage
2. B-4 Raw Silo Elevator
3. B-17 Raw Mill Conveying
4. C-59 Bin #B – Main/Offspec Clinker or Limestone
5. D-5 Westernmost Cement Silos
6. D-6 East Cement Silos
7. D-7 Westernmost Masonry Cement Silos
8. D-36 West Cement Silos
9. D-37 Westernmost Cement Silos Reclaim Belt 530222 No. 1
10. D-38 Westernmost Cement Silos Reclaim Belt 530222 No. 2
11. D-39 Westernmost Cement Silos Reclaim Belt 530222 No. 3
12. D-40 West Cement Silos Reclaim Belt 530262 No. 1
13. D-41 West Cement Silos Reclaim Belt 530262 No. 2
14. D-42 West Cement Silos Reclaim Belt 530262 No. 3
15. D-43 East Cement Silos Reclaim Belt 530306 No. 1
16. D-44 East Cement Silos Reclaim Belt 530306 No. 2
17. D-45 East Cement Silos Reclaim Belt 530306 No. 3
18. D-46 Westernmost Cement Silos Belt 530222 to Bucket Elevator
19. D-47 West Cement Silos Belt 530262 to Bucket Elevator
20. D-48 East Cement Silos Reclaim Belt 530306 to Buck Elevator
21. E-4 No. 1 Packing
22. E-5 No. 2 Packing
23. E-6 No. 3 Packing
24. E-7 No. 4 Packing
25. G-20 Coal Return Belt Transfer Drop
26. G-25 Carbon Black Silo

Through the comparison of the new As-Built permit and the Title V permit, it was determined that a multitude of sources needed to be added to the Title V permit and that the naming of a multitude of sources had changed from one permit to the next. With that being said, once the new As-Built permit has been issued, the plant will do a minor modification to add sources, change names, and attached the new As-Built permit to the Title V permit. Are you alright with this approach?

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Thursday, June 27, 2024 2:10 PM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Schell, Paul <Paul.Schell@Buzziunicemusa.com>; Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hi Hannah,

Do you still plan on submitting a list of emission units that you would like removed from the FOP? Please provide an answer by COB **tomorrow 06/28/2024**. If you want to wait and remove the units in a minor revision, please let me know that you approve the WDP sent to you on May 20th.

Best Regards,

Robert P. Hunter
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-1244

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Thursday, May 23, 2024 11:53 AM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Schell, Paul <Paul.Schell@Buzziunicemusa.com>; Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Dear Mr. Hunter,

Upon further review of the WDP, I think a meeting to discuss the Title V permit would be helpful. Would you happen to have time for a meeting on Tuesday, May 28, 2024? Thank you so much.

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Monday, May 20, 2024 9:26 AM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Schell, Paul <Paul.Schell@Buzziunicemusa.com>; Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: {Disarmed} RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hey Hannah,

I have attached the WDP for review. Please let me know if you have any comments by **05/27/2024**.

Let me know if you have any questions. Thank you for your cooperation.

Best Regards,

Robert P. Hunter
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-1244

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Thursday, May 16, 2024 2:37 PM

To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Schell, Paul <Paul.Schell@Buzziunicemusa.com>; Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Dear Mr. Hunter,

Before filling out OP-UA15 to file G-26, G-27, and G-28, under Title 30 Part 1 Chapter 111.111, I went through the complete email correspondence between you, me, and Paul Schell. While going through this email chain, I came across a response from Paul Schell to you that stated, "Emission Units G-26, G-27, and G-28 have either been removed or were never constructed. Therefore I have removed them from Form OP-UA64 (attached)." When I started investigating what these units were supposed to be controlling, I realized that Paul Schell was correct. G-26, G-27, and G-28, no longer or may have never existed. With all that being said, you were right to remove G-26, G-27, and G-28, from the Title V permit. Since these units do not belong in the Title V permit, can you please send out the WDP again for final review? Thank you so much.

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Thursday, May 9, 2024 2:22 PM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Schell, Paul <Paul.Schell@Buzziunicemusa.com>; Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: {Disarmed} RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Good afternoon Hannah,

There is more information needed to complete my review. Please address the following items by **05/16/2024**.

- Emission units G-26, G-27, and G-28 were not submitted on any Unit Attribute (OP-UA) form/table that would give them 30 TAC Chapter 111 applicability. Please include these units on the appropriate OP-UA form and Table, if they are subject to Chapter 111.
- The "112(B) HAPS" label for the pollutant is just a placeholder. In the future when our rule analysis is up to date, the pollutant will be labeled OPACITY again. The correct applicable requirements are still in the Permit and outlined in the Statement of Basis.

Please let me know if you have any questions. Thank you for your cooperation.

Sincerely,

Robert P. Hunter
Title V Permit Reviewer
OA/Air Permits Division/OP Section
MC-163, P.O. Box 13087
Austin, TX 78711-3087
robert.hunter@tceq.texas.gov

Phone: (512) 239-1244
Fax: (512) 239-1400

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Thursday, April 4, 2024 7:14 PM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Schell, Paul <Paul.Schell@Buzziunicemusa.com>; Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Dear Mr. Hunter,

Attached to this email is the OP-SUMR Table 2 for S-B-4, S-B-12, S-B-13, and S-B-14, as you requested.

Can we please put G-26, G-27, and G-28, back into the permit under Title 30 Part 1 Chapter 111.111?

Thank you for the extra day to review the WDP. Upon review of this said document, I only have one further comment. In the Applicable Requirements Summary, can we please change the

pollutant on the SOP Index No. 63LLL to OPACITY instead of 112(B) HAPS for GRPALTFUEL, GRPBAG, GRPCARBON, GRPCLINK, GRPCOALML, GRPCOOLER, GRPFINMIL, GRPKLNFEED, GRPLOAD, GRPRAWMILL, GRPRAWSILO, GRPRAWSILO2, GRPSILO, GRPSILO23, GRPTRANSFR, S-C-85, S-C-86, and S-C-87?

Thank you so much.

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Wednesday, March 27, 2024 5:50 PM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Schell, Paul <Paul.Schell@Buzziunicemusa.com>; Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: {Disarmed} RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hi Hannah,

Thank you for the supporting information and updated forms. Please submit an OP-SUMR Table 2, so we can document emission units S-B-4, S-B-12, S-B-13, and S-B-14 being added to emission group GRPRAWSILO. I have added them in for this WDP. I have removed G-26, G-27, and G-28 from the permit, since 60Y was the only applicable requirement they had.

Please review the attached WDP and submit any comments you have by **April 3, 2024.**

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at Where to Submit FOP Applications and Permit-Related Documents.

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Best Regards,

Robert P. Hunter
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-1244

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Wednesday, March 20, 2024 2:57 PM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Schell, Paul <Paul.Schell@Buzziunicemusa.com>; Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Good afternoon Mr. Hunter,

The effective date on the cover letter of 82775 and PSDTX1101 is October 18th, 2019. The letter is dated October 23rd, 2019. Please see the attached for reference.

Please find the OP-UA33 form for the RAWGRPSILO, which is the group that the emissions units S-B-4, S-B-12, S-B-13, and S-B-14 is a part of.

Please find an updated OP-REQ1 form page 15.

Emission units G-26, G-27, G-28 at the plant process pet coke and do not process coal. NSPS Y applies to coal processing and does not apply to pet coke. NSPS Y would not apply to the three sources since they do not handle or process coal.

Please do not hesitate to reach out with any questions or concerns.

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Wednesday, March 6, 2024 10:52 AM
To: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Cc: Schell, Paul <Paul.Schell@Buzziunicemusa.com>; Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: {Disarmed} RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hey Hannah,

Please address the following items by **March 20, 2024.** Once these discrepancies have been resolved, I will send an updated WDP.

- Item 1: Our records indicate that 82775 and PSDTX1101 were renewed on October 23, 2019. Please submit an updated OP-REQ1 page 87 only with an updated issuance date.
- Item 3: Please submit an OP-UA33 for emission units S-B-4, S-B-12, S-B-13, and S-B-14. These units were not included in the OP-UA33 submitted in the application.
- Item 4: Please review your answers on the OP-REQ1 submitted in the renewal application. Specifically, Question IV.H.1 should be reviewed. Please submit an updated copy of OP-REQ1 page 15.
- Item 9: Please review the OP-UA64 form instructions for Table 1a and 1b and submit an updated copy. From my review, emission units G-26, G-27, and G-28 need an answer for PM Emission rate on Table 1b(page 2). Emission unit D-58 has been added back to the permit.

Let me know if you have any questions.

Sincerely,

Robert P. Hunter
Title V Permit Reviewer
OA/Air Permits Division/OP Section
MC-163, P.O. Box 13087
Austin, TX 78711-3087
robert.hunter@tceq.texas.gov

Phone: (512) 239-1244
Fax: (512) 239-1400

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From: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>
Sent: Friday, February 9, 2024 6:15 PM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Schell, Paul <Paul.Schell@Buzziunicemusa.com>; Pineda, Antonio <Antonio.Pineda@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Dear Robert Hunter,

I am sorry about submitting the comments to the draft report late. However, there was a multitude of comments/questions that the plant has about this said draft Title V permit. Please see those comments/questions below:

1. In consideration of the Permit 82775 and PSDTX1101, the permits were renewed on October 18, 2019, and will expire on October 18, 2029. A Form OP-REQ1 with the permit renewal date has been attached to this email. However, an "as-built" application was originally submitted on April 7, 2023, for these permits, but a new permit has yet to be issued.
2. In consideration of OP-PBRSUP, an updated form has been attached with the date changed.
3. When it comes to emission units: B-4, B-12, B-13, and B-14, the intention was not to rename them. Since GRPRAWSILO includes B-4, B-12, B-13, and B-14, these emission untis were submitted on an UA33 under the group name of GRPRAWSILO.
4. For the draft permit, Special Terms and Conditions #4 needs to be removed. The plant does not manufacture, distribute, sale, or install natural gas-fired water heaters, boilers, and process heaters, making this condition unnecessary.
5. For GRPCLINK, GRPFINMILL, GRPKILNFEED, GRPRAWMILL, etc, the unit summary and applicable requirements summary only has to follow the regulations of 40 CFR Part 60, Subpart F and excludes the regulation of 40 CFR Part 63, Subpart LLL, is there a reason for this?
6. In the Applicable Requirements Summary, the GRPCOOLER PM should be 0.02 lb/ton clinker instead of 0.10 lb/ton of feed (dry bassis) to the kiln since it is a new clinker cooler.
7. In the Applicable Requirements Summary, there should be no GRPCOOLER PM (Opacity) requirement due to 60.62(b)(1)(iv). This regulation states that the Clinker Coolers do not need an opacity limit if they have a PM limit due to having a PM continuous parametric monitoring system installed.

8. In the Applicable Requirements Summary, the GRPKILN PM should be 0.02 lb/ton clinker instead of 0.01 lb/ton clinker. Furthermore, this is not calculated through a 30-day rolling average, but 3 1-hr stack testing runs.
9. Why has G-26, G-27, and G-28, been removed from the Unit Summary, Applicable Requirements Summary, and New Source Review Authorization References by Emissions Unit table? Why has D-58 been removed from the New Sources Review Authorization References by Emissions Unit table?

If you have any questions, comments, or concerns, please let me know as soon as possible.

Sincerely,

Hannah Harris
Environmental Engineer
Buzzi Unicem USA: Maryneal Plant
Office: 325-842-7365
Mobile: 325-236-4271

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Wednesday, January 24, 2024 12:33 PM
To: Schell, Paul <Paul.Schell@Buzziunicemusa.com>
Cc: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>; Ferguson, Michelle <Michelle.Ferguson@buzziunicemusa.com>
Subject: {Disarmed} RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Mr. Paul Schell,

I have conducted a technical review of renewal application for Lone Star Industries, Inc., Maryneal Cement Plant. An electronic copy of the Working Draft Permit (WDP) is attached for your review. This WDP contains the TCEQ determination of applicable requirements based on the information submitted in your application, and any updates provided.

Please review the WDP and submit to me any comments you have on the working draft permit by **February 7, 2024** . Please submit a written response by this deadline, even if you are not making any comments on the content of the WDP. Please also address the following items:

- **OP-REQ1 (Page 87 only) –** Would you like to incorporate a more recent issuance date for NSR Permits 82775 and PSDTX1101? If so, please update the issuance dates on OP-REQ1, page 87.
- **OP-PBRSUP –** In the Header please enter a specific date rather than just Month/Year. For example – May 9, 2023. Please submit the full OP-PBRSUP with the updated Header.

- Emission units B-4, B-13, B-13, and B-14 were renamed S-B-4, S-B-12, S-B-13, and S-B-14 respectively. If this was not what you intended, please submit S-B-4, S-B-12, S-B-13, and S-B-14 on a UA form or OP-REQ2.

Please review the second portion of the "SOP Technical Review Fact Sheet" located at https://link.spamstopshere.net/u/411aae8b/jpdw6rg07xGLB9sOXNGfSw?u=http%3A%2F%2Fwww.tceq.texas.gov%2Fassets%2Fpublic%2Fpermitting%2Fair%2FGuidance%2FTitle_V%2Fsop_wdp_factsheet.pdf. This guidance contains important information regarding WDP review and comment procedures.

Note that a Certification by Responsible Official (Form OP-CRO1) for any uncertified application information, including application updates supporting the WDP comments, is required. After final review of the WDP, additional changes supported by application updates may require certification. I will advise you of these changes at a later date. Prior to transmittal of the Public Notice/Announcement Authorization Package, a duly signed OP-CRO1 form may be required which includes the specific dates or time-period of all submitted application documentation that was not previously certified. I will advise you of this requirement prior to sending the Public Notice/Announcement Authorization.

Application updates may now be submitted through Title V STEERS. Any application updates that are submitted by the RO/DAR through STEERS are certified and do not require the submittal of an original signature OP-CRO1. Application updates that are provided through email or physical mail require certification using an original signature OP-CRO1.

Please notify me when these updates have been submitted.

As required on Form OP-1, question IV.D, please remember the FOP application and all application updates must be submitted to EPA Region 6 at R6AirPermitsTX@epa.gov and to the TCEQ regional office having jurisdiction. This submittal information can be found on our website at Where to Submit FOP Applications and Permit-Related Documents.

Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

Thank you for your cooperation.

Sincerely,

Robert P. Hunter
Title V Permit Reviewer
OA/Air Permits Division/OP Section
MC-163, P.O. Box 13087
Austin, TX 78711-3087
robert.hunter@tceq.texas.gov

Phone: (512) 239-1244
Fax: (512) 239-1400

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From: Schell, Paul <Paul.Schell@Buzziunicemusa.com>
Sent: Friday, December 8, 2023 9:11 AM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>; Ferguson, Michelle <Michelle.Ferguson@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Attached is the updated form OP-UA64. Let me know if you need anything else.

Paul

Paul T. Schell
Corporate Environmental Manager
Buzzi Unicem USA
1000 River Cement Road
Festus, MO 63028
(636) 931-2536 (office)
(573) 450-8612 (mobile)

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Thursday, December 7, 2023 4:49 PM
To: Schell, Paul <Paul.Schell@Buzziunicemusa.com>
Cc: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>; Ferguson, Michelle <Michelle.Ferguson@buzziunicemusa.com>
Subject: {Disarmed} RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

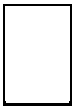
Good afternoon Paul,

For emission group GRPCOALNEW on page 1 of the OP-UA64, please provide a unit attribute for "Control Device" and "Digital Opacity" and submit an updated copy by **12/14/2023**.

Sincerely,

Robert P. Hunter
Title V Permit Reviewer
OA/Air Permits Division/OP Section
MC-163, P.O. Box 13087
Austin, TX 78711-3087
robert.hunter@tceq.texas.gov

Phone: (512) 239-1244
Fax: (512) 239-1400



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From: Schell, Paul <Paul.Schell@Buzziunicemusa.com>
Sent: Thursday, December 7, 2023 1:03 PM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Cc: Harris, Hannah <Hannah.Harris@buzziunicemusa.com>; Ferguson, Michelle <Michelle.Ferguson@buzziunicemusa.com>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Mr. Hunter,
Attached are the requested forms. I completed OP-MON for GRPCOAL1 and GRPCOALNEW since an OP-MON for GRPCOAL2 was already completed. Emission Units G-26, G-27, and G-28 have either been removed or were never constructed. Therefore I have removed them from Form OP-UA64 (attached).

I want to clarify something on the OP-MON form for GRPCOAL1, GRPCOAL2, and GRPCOALNEW for Subpart Y. The Maryneal plant has never processed coal with this equipment only petroleum coke and Subpart Y doesn't apply when the equipment is processing petroleum coke. This rule only applies to **coal** handling equipment. This is why the Periodic Monitoring Text for GRPCOAL1, CRPCOAL2, and GRPCOALNEW says "When coal is being processed…". While pet coke is being processed, the equipment is only subject to the state opacity regulation. As such, does Buzzi need to submit another form OP-MON to describe the periodic monitoring that will be done to demonstrate compliance with the state opacity limit?

I reviewed the TCEQ Guidance Document on Periodic Monitoring. It states , "An emission unit requires periodic monitoring if the emission limitation or standard that the unit is subject to does not specify periodic monitoring (which may consist of recordkeeping) that is sufficient to yield reliable data from a relevant time period that is representative of the emission unit's compliance with the applicable

requirement…". Emission Units A-26 and A-27 are subject to NSPS Subpart OOO. Subpart OOO §60.674(c) states, "the owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses a baghouse to control emissions must conduct quarterly 30-minute visible emissions inspections using EPA Method 22 (40 CFR part 60, appendix A-7). The Method 22 (40 CFR part 60, appendix A-7) test shall be conducted while the baghouse is operating. The test is successful if no visible emissions are observed. If any visible emissions are observed, the owner or operator of the affected facility must initiate corrective action within 24 hours to return the baghouse to normal operation." Buzzi believes this is adequate to document compliance with the applicable standard. As such, we don't believe Form OP-MON is required for Emission Units A-26 and A-27.

Please let me know if you have any questions or need additional information.

Thanks,
Paul

Paul T. Schell
Corporate Environmental Manager
Buzzi Unicem USA
1000 River Cement Road
Festus, MO 63028
(636) 931-2536 (office)
(573) 450-8612 (mobile)

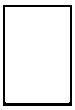
From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Tuesday, December 5, 2023 2:26 PM
To: Schell, Paul <Paul.Schell@Buzziunicemusa.com>
Subject: {Disarmed} RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hey Mr. Schell,

I found the OP-MON for GRPCOAL2 in the application so an additional one is not needed.

Best Regards,

Robert P. Hunter
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-1244



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From: Schell, Paul <Paul.Schell@Buzziunicemusa.com>
Sent: Tuesday, December 5, 2023 1:02 PM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

It looks like we submitted a from OP-MON for GRPCOAL2 with the original application. Did you mean GRPCOALNEW?

Paul T. Schell
Corporate Environmental Manager
Buzzi Unicem USA
1000 River Cement Road
Festus, MO 63028
(636) 931-2536 (office)
(573) 450-8612 (mobile)

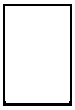
From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Tuesday, December 5, 2023 10:10 AM
To: Schell, Paul <Paul.Schell@Buzziunicemusa.com>
Subject: {Disarmed} RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Mr. Schell,

Please submit form OP-MON for emission group GRPCOAL 2(Index no. 60Y) for Periodic Monitoring for PM Opacity under Main Standard 40 CFR Part 60, Subpart Y 60.254(a) and an OP-MON for emission units A-26 and A-27(Index no. 60OOO) for Periodic Monitoring for PM under Main Standard 40 CFR Part 60, Subpart OOO 60.672(a)- Table 2. Let me know if you have any questions.

Best Regards,

Robert P. Hunter
Title V Permit Reviewer
TCEQ – APD – OP Section (Title V)
(512) 239-1244



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From: Schell, Paul <Paul.Schell@Buzziunicemusa.com>
Sent: Tuesday, December 5, 2023 9:53 AM
To: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Subject: RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Mr. Hunter,
I'm unsure what you're requesting in bullet items 2 and 3 below. They appear to be statements rather than requests for information. Is this just a comment, or do you need something related to these?

Thanks,
Paul

Paul T. Schell
Corporate Environmental Manager
Buzzi Unicem USA
1000 River Cement Road
Festus, MO 63028
(636) 931-2536 (office)
(573) 450-8612 (mobile)

From: Robert Hunter <Robert.Hunter@tceq.texas.gov>
Sent: Monday, December 4, 2023 12:55 PM
To: Schell, Paul <paul.schell@buzziunicemusa.com>
Subject: {Disarmed} RE: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Mr. Paul Schell,

What is the status of the items requested below? Please provide a response by **12/08/2023**.

Sincerely,

Robert P. Hunter
Title V Permit Reviewer
OA/Air Permits Division/OP Section
MC-163, P.O. Box 13087
Austin, TX 78711-3087
robert.hunter@tceq.texas.gov

Phone: (512) 239-1244
Fax: (512) 239-1400

Links contained in this email have been replaced. If you click on a link in the email above, the link will be analyzed for known threats. If a known threat is found, you will not be able to proceed to the destination. If suspicious content is detected, you will see a warning.

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From: Robert Hunter
Sent: Wednesday, October 11, 2023 11:50 AM
To: hannah.harris@buzziunicmusa.com; paul.schell@buzziunicemusa.com
Subject: Technical Review - FOP O1119/Project 35134 Lone Star Industries, Inc./ Maryneal Cement Plant

Hello Ms. Hannah Harris and Mr. Paul T. Schell,

I have been assigned to the Federal Operating Permit (FOP) renewal permit application of Permit No. O1119 for Lone Star Industries, Inc./ Maryneal Cement Plant. This application has been assigned Project No. 35134. Please address all correspondence pertaining to this permit application, including any updates, to me at the address below, and use both the Permit and Project reference numbers above to facilitate tracking. Please let me know if you one or both of you should be the technical contact(s) for this project.

Please review the "SOP Technical Review Fact Sheet" located at http://www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/sop_wdp_factsheet.pdf. This guidance contains important information regarding the review process and application update procedures. Contact me if you have any questions regarding the guidelines, the project schedule, or any other details regarding your application or permit.

In addition, I wanted to let you know that EPA has, on occasion, objected to Title V permits based on the following:

a. NSR permit and PBR monitoring sufficiency –please refer to our periodic monitoring guidance for reference of monitoring that EPA has, so far, considered sufficient.
b. Reference to confidential business information (CBI) in NSR permits and PBR submittals.
c. High level terms in the SOP Applicable Requirement Summary Table. The high level terms are sometimes used in SOPs when unit attribute forms have not yet been updated due to regulatory amendments.
d. Accuracy of PBR information provided on the supplemental table and in the permit – please refer to Forms OP-PBRSUP and OP-REQ1 Instructions.

If you have any questions or concerns on any of these items or think you need to do any additional updates, let me know and we can discuss further.

Thank you for your cooperation.

Sincerely,

Robert P. Hunter
Title V Permit Reviewer
Texas Commission on Environmental Quality
OA/Air Permits Division/OP Section

MC-163, P.O. Box 13087
Austin, TX 78711-3087
robert.hunter@tceq.texas.gov

Phone: (512) 239-1244
Fax: (512) 239-1400

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Texas Commission on Environmental Quality

Form OP-UA64 - Instructions
Coal Preparation Plant Attributes

General:

This form is used to provide a description and data pertaining to all coal preparation plants with potentially applicable requirements associated with a particular regulated entity number and application. Each table number, along with the possibility of a corresponding letter (i.e., Table 1a, Table 1b), corresponds to a certain state or federal rule. If the rule on the table is not potentially applicable to a coal preparation plant then it should be left blank and need not be submitted with the application. If the codes entered by the applicant show negative applicability to the rule or sections of the rule represented on the table, then the applicant need not complete the remainder of the table(s) that corresponds to the rule. Further instruction as to which questions should be answered and which questions should not be answered are located in the "Specific" section of the instruction text. The following is included in this form:

Tables 1a-1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Y: Standards of Performance for Coal Preparation Plants

The Texas Commission on Environmental Quality (TCEQ) Regulated Entity Number (RNXXXXXXXXX) and the application area name from Form OP-1 (Site Information Summary) must appear in the header of each page for the purpose of identification for the initial submittal. The date of the initial form submittal must also be included and should be consistent throughout the application (MM/DD/YYYY). Leave the permit number blank for the initial form submittal. If this form is included as part of the permit revision process, enter the permit number assigned by the TCEQ, the area name (from Form OP-1), the date of the revision submittal, and the regulated entity number.

Unit attribute questions that do not require a response from all applicants are preceded by qualification criteria in the instructions. If the unit does not meet the qualification criteria, a response to the question is not required**. Anytime a response is not required based on the qualification criteria, leave the space on the form blank.**

Notwithstanding any qualification criteria in the form instructions or information provided in other TCEQ guidance, the applicant may leave an attribute question blank (or indicate "N/A" for "Not Applicable") if the attribute is not needed for the applicable requirement determinations of a regulation for a unit.

In some situations, the applicant has the option of selecting alternate requirements, limitations, and/or practices for a unit. Note that these alternate requirements, limitations, and/or practices must have the required approval from the TCEQ Executive Director and/or the U.S. Environmental Protection Agency (EPA) Administrator before the federal operating permit application is submitted.

The Texas Commission on Environmental Quality (TCEQ) requires that a Core Data Form be submitted on all incoming registrations unless all of the following are met: the Regulated Entity and Customer Reference Numbers have been issued by the TCEQ and no core data information has changed. The Central Registry, a common record area of the TCEQ, maintains information about TCEQ customers and regulated activities, such as company names, addresses, and telephone numbers. This information is commonly referred to as "core data." The Central Registry provides the regulated community with a central access point within the agency to check core data and make changes when necessary. When core data about a facility is moved to the Central Registry, two new identification numbers are assigned: the Customer Reference (CN) number and the Regulated Entity (RN) number. The Core Data Form is required if facility records are not yet part of the

Central Registry or if core data for a facility has changed. If this is the initial registration, permit, or license for a facility site, then the Core Data Form must be completed and submitted with application or registration forms. If amending, modifying, or otherwise updating an existing record for a facility site, the Core Data Form is not required, unless any core data information has changed. To review additional information regarding the Central Registry, go to the TCEQ Web site at www.tceq.texas.gov/permitting/central_registry.

Specific:

Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Y: Standards of Performance for Coal Preparation Plants

★ **Complete this table only for the following affected facilities at a coal preparation plant with a design capacity greater than 200 tons of coal per day: thermal dryers, pneumatic coal-cleaning equipment (air tables), and coal processing and conveying equipment (including breakers and crushers), coal storage systems, coal transfer and loading systems or mechanical vents.**

Note: For more information about actual processing or design capacity, refer to the TCEQ Rule Interpretation Number 60Y.001.

★ **DO NOT complete this table if the plant chooses the option to operate under a federally enforceable limit of less than 200 tons per day.**

★ **DO NOT complete this table for open storage piles. Complete the form OP-REQ1.**

Unit ID No.:
Enter the identification number (ID No.) for the coal preparation equipment (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

Note: Affected facilities may be grouped or aggregated as processes in Table 1a. Unit identification numbers should be listed in Table 1a, even if no other responses are required.

SOP Index No.:
Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf.

▼ **Continue only if "Federally Enforceable Limit Option" is "NO."**

Affected Facility:
Select one of the following options for the affected facility describing the unit. Enter the code on the form.

Code	Description
THMDRY	Thermal dryers
PNMCLN	Pneumatic coal-cleaning equipment (air tables)
CLSYST	Coal processing and conveying equipment (including breakers and crushers), coal storage systems (excluding open storage piles), or coal transfer and loading systems
MECHVNT	Mechanical Vent

★ **Complete "Covered Under Another Subpart" only if "Affected Facility" is "THMDRY."**

Covered Under Another Subpart:

Enter "YES" if the thermal dryers are receiving all of their thermal input from an affected facility covered under another 40 CFR Part 60 subpart. Otherwise, enter "NO."

Construction/Reconstruction/Modification Date:

Select one of the following options that describe the date of commencement of the most recent construction, reconstruction, or modification for any of the affected facilities. Enter the code on the form.

Thermal Dryers

Code	Description
74-	On or before October 24, 1974
74-08	After October 24, 1974 and before April 28, 2008
C08-09	Constructed after April 28, 2008 and before May 27, 2009
R08-09	Reconstructed after April 28, 2008 and before May 27, 2009
M08-09	Modified after April 28, 2008 and before May 27, 2009
C09+	Constructed after May 27, 2009
R09+	Reconstructed after May 27, 2009
M09+	Modified after May 27, 2009

Pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems (excluding open storage piles), coal transfer and loading systems, or mechanical vent

Code	Description
74-	On or before October 24, 1974
74-08	After October 24, 1974 and before April 28, 2008
C08+	Constructed after April 28, 2008
R08+	Reconstructed after April 28, 2008
M08+	Modified after April 28, 2008

▼ **Do Not Continue if "Affected Facility" is "THMDRY, PNMCLN, or CLSYST" and " Construction/Reconstruction/Modification Date" is "74-" or "Affected Facility" is "MECHVNT" and "Construction/Reconstructed/Modification Date" is "74- or 74-08"**

★ **Do not complete "Control Device Type" if "Affected Facility" is "PNMCLN or CLSYST" and "Construction/Modification Date" is "74-08."**

Control Device Type:
Select one of the following options to describe if the unit uses a control device. Enter the code on the form.

Thermal Dryers, Pneumatic coal-cleaning equipment (air tables) or Coal processing and conveying equipment (including breakers and crushers), coal storage systems (excluding open storage piles), or coal transfer and loading systems

Code	Description
BLDS	Emissions are controlled by a bag leak detection system complying with the requirements in §60.256(c)
WTSCR	Emissions are controlled by a wet scrubber
OTH	Emissions are controlled by control equipment other than a wet scrubber
NONE	Emissions are not controlled by a control device

Mechanical Vents

Code	Description
FABFLT	Emissions are controlled by a fabric filter with a design controlled PM emission of 25 Mg (28 tons) per year or more with a bag leak detection system complying with the requirements in §60.256(c)
WTSCR	Emissions are controlled by a wet scrubber
OTH	Emissions are controlled by control equipment other than a wet scrubber

Control Device ID No.:

Enter the identification number (ID No.) for the control device to which emissions are routed (maximum 10 characters). This number should be consistent with the control device identification number listed on Form OP-SUM. If there is no control device, then leave this column blank.

★ **Do not complete "COMPLIANCE OPTION" if "Affected Facility" is "MECHVNT."**

Compliance Option:
Select one of the following options that describes which monitoring option the affected facility is using. Enter the code on the form.

Code	Description
255F	Affected facility electing to comply with the requirements of §60.255(f)(1) or §60.255(f)(2)
255G	Affected facility using a COMS to comply with the requirements of §60.255(g)(1) or §60.255(g)(2)
255B2	Affected facility is complying with §60.255(b)(2)

★ **Do not complete "Digital Opacity" if "Affected Facility" is "MECHVNT."**

Digital Opacity:

Enter "YES" if the affected facility is using a monitoring plan for a digital opacity compliance system. Otherwise, enter "NO."

Table 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Y: Standard of Performance for Coal Preparation Plants

Unit ID No.:
Enter the identification number (ID No.) for the coal preparation equipment (maximum 10 characters) as listed on Form OP-SUM (Individual Unit Summary).

SOP Index No.:
Site operating permit (SOP) applicants should indicate the SOP index number for the unit or group of units (maximum 15 characters consisting of numeric, alphanumeric characters, and/or dashes prefixed by a code for the applicable regulation [i.e., 60KB-XXXX]). For additional information relating to SOP index numbers, please refer to the TCEQ website at www.tceq.texas.gov/assets/public/permitting/air/Guidance/Title_V/additional_fop_guidance.pdf.

★ **Complete "Thermal Input of SO2" if "Affected Facility" is "THMDRY" and "Construction/Modification Date" is "C09+, R09+, or M09+."**

Thermal Input of SO2:

Enter "YES" if the thermal dryers are receiving all of their thermal input from a source other than coal or residual oil, or receive all of their thermal input from a source subject to an SO2 limit under another subpart of 40 CFR Part 60, or that use waste heat or residual from the combustion of coal or residual oil as their only input. Otherwise, enter "NO."

★ **Complete "Comply with §60.252(b)(2)(i)" if "Thermal Input of SO2" is NO.**

Comply with §60.252(b)(2)(i):
Enter "YES" if the thermal dryer is comply with the emission limitation of §60.252(b)(2)(i). Otherwise, enter "NO."

★ **Complete "Thermal Input of NOx/CO" if "Affected Facility" is "THMDRY" and "Construction/Modification Date" is "C09+, R09+, M09+."**

Thermal Input of NOx/CO:
Enter "YES" if the thermal dryers are receiving all of their thermal input from a source other than coal or residual oil, or receive all of their thermal input from a source subject to a NO_x limit and/or CO limit under another subpart of 40 CFR Part 60, or that use waste heat or residual from the combustion of coal or residual oil as their only input. Otherwise, enter "NO."

★ **Complete "PM Emission Rate" if "Affected Facility" is "PNMCLN or MECHVNT" and "Construction/Modification Date" is "C08+, R08+, or M08+."**

PM Emission Rate:
Enter "YES" if the control device used is with a PM emission rate of 1.0 Mg (1.1 tons) per year or less and meets the requirements of §60.255(d)(1)-(3). Otherwise, enter "NO."

Coal Preparation Plant Attributes
Form OP-UA64 (Page 1)
Federal Operating Permit Program

Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Y: Standards of Performance for Coals Preparation Plants

Date: December 8, 2023	**Permit No.:** O1119	**Regulated Entity No.:** 100220847
Area Name: Maryneal Cement Plant		**Customer Reference No.:** 600363683

Unit ID No.	SOP Index No.	Affected Facility	Covered Under Another Subpart	Construction/ Reconstruction/Modification Date	Control Device Type	Control Device ID No.	Compliance Option	Digital Opacity
GRPCOAL1	60Y	CLSYST		74-08				
GRPCOALNEW	60Y	CLSYST		C08+	OTH	C-G-29 & C-G-30	255B2	NO
GRPCOAL2	60Y	MECHVNT		74-08				

Coal Preparation Plant Attributes
Form OP-UA64 (Page 2)
Federal Operating Permit Program

Table 1b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Y: Standards of Performance for Coals Preparation Plants

Date:	Permit No.:	Regulated Entity No.:
Area Name:		Customer Reference No.:

Unit ID No.	SOP Index No.	Thermal Input of SO_2	Comply with §60.252(b)(2)(i)	Thermal Input of NOx/CO	PM Emission Rate

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 3)
Federal Operating Permit Program
Table 1c: CAM/PM Case-By-Case Additions

I. Identifying Information		
Account No.: ND-0014-S	RN No.: 100220847	CN: 600363683
Permit No: O1119	Project No.: Not Applicable	
Area Name: Maryneal Cement Plant		
Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 10		
Unit/EPN/Group/Process ID No.: GRPCOAL1		
Applicable Form: UA64		
III. Applicable Regulatory Requirement		
Name: NSPS Subpart Y		
SOP/GOP Index No.: 60Y1		
Pollutant: PM (Opacity)		
Main Standard: 60.254(a)		
Monitoring Type: PM		
Unit Size:		
Deviation Limit: Opacity greater than 20%		
IV. Control Device Information		
Control Device ID No.:		
Device Type:		
V. CAM Case-by-case		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator: Opacity	Minimum Frequency: Once per month	
Averaging Period: Six-minutes		

I. Identifying Information
Periodic Monitoring Text: When coal is being processed, opacity shall be monitored, by a certified observer, for at least one, six-minute period in accordance with Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9. Any opacity readings above the deviation limit shall be reported as a deviation.

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 3)
Federal Operating Permit Program
Table 1c: CAM/PM Case-By-Case Additions

I. Identifying Information		
Account No.: ND-0014-S	RN No.: 100220847	CN: 600363683
Permit No: O1119	Project No.: Not Applicable	
Area Name: Maryneal Cement Plant		
Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 10		
Unit/EPN/Group/Process ID No.: GRPCOAL2		
Applicable Form: UA64		
III. Applicable Regulatory Requirement		
Name: NSPS Subpart Y		
SOP/GOP Index No.: 60Y2		
Pollutant: PM (Opacity)		
Main Standard: 60.254(a)		
Monitoring Type: PM		
Unit Size:		
Deviation Limit: Opacity greater than 20%		
IV. Control Device Information		
Control Device ID No.: C-G-2 & C-G-3		
Device Type: FABFLT		
V. CAM Case-by-case		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator: Opacity	Minimum Frequency: Once per month	
Averaging Period: Six-minutes		

I. Identifying Information
Periodic Monitoring Text: When coal is being processed, opacity shall be monitored, by a certified observer, for at least one, six-minute period in accordance with Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9. Any opacity readings above the deviation limit shall be reported as a deviation.

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 3)
Federal Operating Permit Program
Table 1c: CAM/PM Case-By-Case Additions

I. Identifying Information		
Account No.: ND-0014-S	RN No.: 100220847	CN: 600363683
Permit No: O1119	Project No.: Not Applicable	
Area Name: Maryneal Cement Plant		
Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 10		
Unit/EPN/Group/Process ID No.: GRPCOALNEW		
Applicable Form: UA64		
III. Applicable Regulatory Requirement		
Name: NSPS Subpart Y		
SOP/GOP Index No.: 60Y1		
Pollutant: PM (Opacity)		
Main Standard: 60.254(a)		
Monitoring Type: PM		
Unit Size:		
Deviation Limit: Opacity greater than 20%		
IV. Control Device Information		
Control Device ID No.:		
Device Type:		
V. CAM Case-by-case		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator: Opacity	Minimum Frequency: Once per month	
Averaging Period: Six-minutes		

I. Identifying Information
Periodic Monitoring Text: When coal is being processed, opacity shall be monitored, by a certified observer, for at least one, six-minute period in accordance with Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9. Any opacity readings above the deviation limit shall be reported as a deviation.

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 4)
Federal Operating Permit Program

Table 1d: CAM/PM Case-By-Case Control Device Additions

Emission Unit ID No.	Control Device ID No.	Control Device Type

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 5)
Federal Operating Permit Program

Table 2a: CAM/PM Deletions

I.	**Identifying Information**
Account No.:	
RN No.:	
CN:	
Permit No.:	
Project No.:	
Area Name:	
Company Name:	
II.	**Unit/Emission Point/Group/Process Information**
Revision No.:	
Unit/EPN/Group/Process ID No.:	
Applicable Form:	
III.	**Applicable Regulatory Requirement**
Name:	
SOP/GOP Index No.:	
Pollutant:	
Main Standard:	
IV.	**Title V Monitoring Information**
Monitoring Type:	
CAM/PM Option No.:	
V.	**Control Device Information**
Control Device ID No.:	
Control Device Type:	
VI.	**Type of Deletion**
Monitoring Requirement:	
Control Device:	

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 6)

Table 2b: CAM/PM Control Device Deletions

Emission Unit ID No.	Control Device ID No.	Control Device Type

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 7)
Federal Operating Permit Program

Table 2c: CAM/PM Case-By-Case Deletions

I.	**Identifying Information**
Account No.:	
RN No.:	
CN:	
Permit No.:	
Project No.:	
Area Name:	
Company Name:	
II.	**Unit/Emission Point/Group/Process Information**
Revision No.:	
Unit/EPN/Group/Process ID No.:	
Applicable Form:	
III.	**Applicable Regulatory Requirement**
Name:	
SOP/GOP Index No.:	
Pollutant:	
Main Standard:	
IV.	**Title V Monitoring Information**
Monitoring Type:	
V.	**Control Device Information**
Control Device ID No.:	
Control Device Type:	
VI.	**Type of Deletion**
Monitoring Requirement:	
Control Device:	

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 8)
Federal Operating Permit Program

Table 2d: CAM/PM Case-By-Case Device Deletions

Emission Unit ID NO.	Control Device ID No.	Control Device Type

Permit By Rule Supplemental Table (Page 1)
Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
May 2, 2023	O1119	RN100220847

Unit ID No.	Registration No.	PBR No.	Registration Date
S-C-85, S-C-86, S-C-87	170877	106.261	12/02/2022
S23-DC3, S17-DC1, S23-DC1, S23-DC2 (GRPSILO23)	171059	106.144	12/14/2022

Permit By Rule Supplemental Table (Page 2)
Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
May 2, 2023	O1119	RN100220847

Unit ID No.	PBR No.	Version No./Date
L-53 (Quarry Vehicle Diesel Tank)	106.478	03/14/1997
L-54 (Quarry Vehicle Tank Fueling)	106.473	03/14/1997

Permit By Rule Supplemental Table (Page 3)
Table C: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
May 2, 2023	O1119	RN100220847

PBR No.	Version No./Date
106.102 (Comfort Heating)	11/15/1996
106.472 (Organic and Inorganic Liquid Loading and Unloading)	03/14/1997
106.227 (Soldering, Brazing, Welding)	03/14/1997
106.263 (Enclosed Outdoor Dry Abrasive Blasting and Maintenance Painting)	11/01/2001
106.265 (Handheld and Manually Operated Machines used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding, etc.)	03/14/1997
106.371 (Cooling-Water Units)	03/14/1997
106.454 (Degreasing Units)	03/14/1997
106.511 (Portable and Emergency Engines and Turbines)	03/14/1997
106.532 (Sludge Management)	03/14/1997
106.532 (Organic chemical usage for water treatment)	03/14/1997

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
May 2, 2023	O1119	RN100220847

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
S-C-85, S-C-86, S-C-87	106.261	170877(12/02/2022)	Recordkeeping of operations sufficient for calculating emissions on an annual basis.
S23-DC3, S17-DC1, S23-DC1, S23-DC2 (Group GRPSILO23)	106.144	171059(12/14/2022)	Recordkeeping of operations sufficient for calculating emissions on an annual basis.
L-53 (Quarry Vehicle Diesel Tank)	106.478	03/14/1997	Recordkeeping of operations sufficient for calculating emissions on an annual basis.
L-54 (Quarry Vehicle Tank Fueling)	106.473	03/14/1997	Recordkeeping of operations sufficient for calculating emissions on an annual basis.

TITLE V OPERATING PERMIT RENEWAL APPLICATION FOR THE MARYNEAL CEMENT PLANT

Prepared by:

Lone Star Industries, Inc. dba Buzzi Unicem USA
Maryneal Plant
202 CR 306
Maryneal, TX 79535
RN100220847
CN600363683

Submitted to:

Texas Commission on Environmental Quality
Air Permits Initial Review Team (APIRT), MC 161
P.O. Box 13087
Austin, TX 78711

Prepared by:

SPECTRUM
Environmental Sciences, Inc.
www.spectrumenv.com

May 2023

TABLE OF CONTENTS

1.0 INTRODUCTION

Lone Star Industries, Inc. dba Buzzi Unicem USA (Buzzi) operates a cement plant in Maryneal, Texas (Nolan County) that is subject to Title 30 of the Texas Administrative Code, Chapter 122 (30 TAC 122) Title V Federal Operating Permit Program. This Title V Operating Permit Renewal Application (Application) is being submitted to the Texas Commission on Environmental Quality (TCEQ) to request the renewal of the Federal Operating Permit (FOP) O-1119 issued to the Maryneal Cement Plant (Plant) on November 9, 2018 and due to expire on November 9, 2023.

This Application is being submitted by May 9, 2023 in order to comply with the requirements of 30 TAC 122.241 for a timely renewal application. Per 30 TAC 122.241, Title V Operating Permit renewal applications are required to be submitted at least six months prior to the expiration of a valid Title V Operating Permit in order to be considered a timely renewal application. Therefore, this Application meets the requirements to be considered a timely application and current Title V Operating Permit terms will remain in effect until the issuance of a renewed Title V Operating Permit No. O-1119.

Section 2.0 of the Application provides a description of all changes being requested as part of the renewal submittal.

Section 3.0 steps through the main cement manufacturing processes at the Plant and provides a narrative description of the Plant air emission sources as depicted in the Process Flow Diagrams included as Appendix A to this Application.

All required TCEQ Title V Operating Permit Renewal Application forms are presented in Section 4.0.

Finally, a copy of the Plant's 40 CFR 63 Subpart LLL Operations and Maintenance Plan, which is required to be included with all Title V Operating Permit renewal applications per 40 CFR 63.1347(a), is included as Appendix B.

2.0 DESCRIPTION OF CHANGES

The following is a list of all changes to the Title V Operating Permit that the Plant is requesting as part of this Application. These changes are each listed on the Form OP-2 in Section 4.0, as required.

Permitted Changes

Since the current Title V Operating Permit No. O-1119 was issued by TCEQ on November 9, 2018, the Plant has not been issued any permit amendments or alterations to currently issued permits that need to be incorporated as part of this Application into the next issuance of the Title V Operating Permit. However, the Plant did register two Permit-By-Rule (PBR) Authorizations for operation of new emission units in 2022 and is requesting that these PBRs and their associated emission units be added to the Title V Permit. The two new PBR registrations are:

- PBR Registration No. 170877, issued December 2, 2022 under PBR 106.261 for the following EPN IDs: S-C-85, S-C-86, and S-C-87.

- PBR Registration No. 171059, issued December 14, 2022 under PBR 106.144 for the following EPN IDs: S23-DC3, S17-DC1, S23-DC1, and S23-DC2.

A new Emission Unit Group, GRPSILO23, has also been established for all of the emission units associated with the Silo 23 truck loadout operations under PBR Registration No. 171059.

The addition of these new sources and group is documented as required on Form OP-2, Form OP-PBRSUP, Form OP-SUMR, Form OP-REQ3, and Form OP-UA33 within this Application.

Review of Historical Permit Authorizations

The Plant conducted a review of all permit authorizations listed in the New Source Review (NSR) Authorization References Tables on pages 34 to 41 of the current Title V Operating Permit. Based on this review, the Plant is requesting the following revisions as part of this Application:

1. Correction of NSR Authorization for emission units S-B-4, S-B-12, S-B-13, and S-B-14 from Permit 49046 to Permit 82775, PSDTX1101. All four of these emission units were modified as part of Permit 82775, PSDTX1101 issued on July 6, 2017 and the conditions and emission limits requirements for their operation are now specified under this permit. Therefore, the Plant is requesting that the NSR Authorization Tables be updated to reflect Permit 82775, PSDTX1101 for these four sources.

2. Permits 5918B, 49046, and 7681 are expired permits that are no longer valid and were issued for emission units that have since been decommissioned and physically removed from the Plant or emission units that were modified and incorporated into Permit 82775, PSDTX1101. Therefore, the Plant is requesting that these three

permits be removed from the list of permits in the NSR Authorization References section of the Title V Operating Permit.

3. Permit 122312 and 5918A are still active permits due to expire in August 2024 and May 2025, respectively. However, these permits were issued for emission units that have been decommissioned and physically removed from the Plant. The Plant is therefore requesting that these two permits be terminated and removed from the list of permits in the NSR Authorization References section of the Title V Operating Permit.

The changes associated with these three permit-related requests have been documented as required on Form OP-2 and Form OP-SUMR within this Application. In addition, the requested permits to be removed are no longer included on Form OP-REQ1.

Review of PBR Authorizations

The Plant also conducted a review of all PBR authorizations listed in the NSR Authorization References Tables on pages 34 to 41 of the current Title V Operating Permit, as well as those PBRs that have been registered or claimed by the Plant. Based on this review, it has been determined that the only PBRs currently applicable to emission units in operation at the Plant are the two new PBRs registered in 2022 (described on the previous page) and PBR 106.478, which was claimed for the operation of the Quarry Vehicle Diesel Tank, Emission Unit L-53. The required information for these three PBRs has been included on the Form OP-PBRSUP Tables A, B, and D with this Application.

The Plant also reviewed all claimed PBRs associated with insignificant activities and have listed those as required on Table C of Form OP-PBRSUP.

All PBRs listed on Form OP-PBRSUP have been included in the NSR Authorizations section of Form OP-REQ1, as required. However, the list of PBRs in the current NSR Authorization table on page 34 of the Title V Operating Permit includes some PBRs that are no longer applicable to current operations at the Plant. Therefore, the Plant is requesting that the PBRs listed below from the NSR Authorization References Table on page 34 of the Title V Operating Permit be removed from future issuance of the permit.

PBRs to be removed from the NSR Authorization Reference Table:

- PBR 106.144 Version No./Date 03/14/1997
- PBR 106.261 Version No./Date 12/24/1998
- PBR 106.261 Version No./Date 09/04/2000
- PBR 106.262 Version No./Date 09/04/2000
- SE 59 Version No./Date 10/04/1995
- SE 118 Version No./Date 10/04/1995

This request is documented in Form OP-2 and OP-SUMR, and the PBRs listed above are not included in the NSR Authorizations section of Form OP-REQ1.

Revisions to GRPCOAL1 and GRPCOAL2 Periodic Monitoring Language

The Plant is requesting that clarifying language be added to the Periodic Monitoring Summaries for groups GRPCOAL1 and GRPCOAL2, currently included on pages 28 and 29 in the Title V Operating Permit. Specifically, the Plant has requested that the following language shown in blue be added to the Periodic Monitoring Text for both groups:

> *Periodic Monitoring Text: When coal is being processed, opacity shall be monitored, by a certified observer, for at least one, six-minute period in accordance with Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9. Any opacity readings above the deviation limit shall be reported as a deviation.*

This change has been included in Form OP-2 and Form OP-MON Table 1c.

3.0 PROCESS DESCRIPTION

The following section contains a process description of material flow, material handling, and kiln process information for the Plant.

Quarry and Raw Material Handling

Limestone is quarried on the Plant property; additive materials, such as sand, clay, iron-rich materials, silica-bearing materials, and other raw material additives are received from offsite sources. Limestone is introduced to a primary crusher system that crushes the material to the necessary size, and then it is conveyed to the Limestone Storage Building. Additive materials are delivered by truck and stored in outside or covered piles prior to use. The materials are moved by front-end-loader (FEL) to a hopper and then conveyed to storage bins. From the storage bins, raw material is metered at predetermined ratios and conveyed to the in-line horizontal-roller type Raw Mill for processing into kiln feed.

Solid Fuel Handling

The solid fuels (i.e., coal and petroleum coke) are brought via railcar and delivered either directly to storage silos or transferred by FEL to storage piles. From the silos, solid fuels are conveyed to the coal/coke ball mill where it is crushed before being conveyed to the kiln and precalciner. The Plant also utilizes natural gas and alternate fuel. The alternate fuel is delivered by truck and deposited in a storage building. The fuel is then transferred by FEL to a hopper and conveyed to a dosing system to be transported to the kiln and precalciner.

Kiln and Clinker Cooler

Kiln feed is conveyed from the Raw Silos to the preheater/precalciner (PH/PC) kiln system where it is introduced at the top of the preheater tower that supports a vertically stacked series of cyclones. The kiln feed travels counter-current to the upward flow of the combustion gases from the PH/PC kiln system. Heat is transferred from the kiln gases to the kiln feed as the kiln feed moves downward through each cyclone. On exiting the bottom-most cyclone vessel, the partially calcined feed will enter the rotary kiln. Rotation and gravity convey the material along the entire length of the kiln where the calcination and sintering processes are completed. When the kiln feed reaches the hot end of the kiln, it has undergone a chemical transformation into cement clinker nodules.

The PH/PC kiln system gases exit the upper end of the preheater tower and are either forced through the Raw Mill, when operational, or bypass the raw grinding system. The PH/PC kiln system gases are then treated by the kiln baghouse and vent to the atmosphere through the existing kiln stack.

Clinker discharged from the PH/PC kiln system passes through a forced-air reciprocating-grate clinker cooler. A portion of the spent cooling air is diverted to the fuel grinding system for use as drying air when this system is in operation. The remaining cooling air is treated in one of three fabric filter dust collectors. Clinker Cooler Baghouse #1 vents to the atmosphere through its own dedicated stack. Clinker Cooler Baghouse #2 and #3 vent to the atmosphere through a combined stack.

Clinker and Finish Mill Additive Handling and Storage

The cooled clinker is conveyed via a system of pan conveyors, elevators, and belt conveyors to one of four clinker storage silos. From the clinker storage silos, the clinker is conveyed to a series of storage bins within the Craneway Storage Building. Additive materials for finish grinding (e.g., gypsum, anhydrite, slag, and limestone) will be trucked from the quarry or offsite to be stored in piles within the quarry area and then transferred by FEL to an additives material hopper that directs the material to bins within the Craneway Storage Building.

Finish Mills

The Plant operates two finish grinding systems, Finish Mill #6 is a vertical horomill and Finish Mill #7 is a rotatory ball mill. The finish mills receive finish materials, such as clinker, gypsum, anhydrite, slag, and limestone, conveyed via a system of pan conveyors, belt elevators, and belt conveyors from their storage bins in the Craneway Storage Building. From the two finish mills, cement is conveyed to the cement silos.

Cement Storage and Loading

The finished cement is delivered to the cement storage silos by belt conveyors. The belt conveyors transfer to air slides which deliver materials into each of the cement silos. Cement is then conveyed to one of two rail unloading systems or one of three truck load-out systems.

The following TCEQ Forms are included in this Application, where only applicable tables for a specific form are included, it is noted in parenthesis after the form name.

- OP-CRO1 - Certification by Responsible Official
- OP-1 - Site Information Summary
- OP-2 - Application for Permit Revision (Tables 1 and 2 only)
- OP-SUMR - Individual Unit Summary for Revisions (Tables 1 and 2 only)
- OP-ACPS - Application Compliance Plan and Schedule (Part 1 only)
- OP-PBRSUP – Permits By Rule Supplemental Table (Tables A – D)
- OP-UA33 – Mineral Processing Plant Attributes (Tables 2a-2c, 3a-3c, and 6a-6c only)
- OP-UA64 – Coal Preparation Plant Attributes (Table 1a only)
- OP-MON – Monitoring Requirements (Table 1c only)
- OP-REQ1 - Application Area-Wide Applicability Determinations
- OP-REQ3 – Applicable Requirements Summary (Tables 1a and 1b only)

Note on Form OP-UA33 and Form OP-UA64:
There are no changes being requested to the majority of emission units listed in the current Title V Operating Permit that would require a Unit Attribute form to be completed. However, since Form OP-UA33 and Form OP-UA64 have been significantly revised since the previous issuance of the Title V Operating Permit, the Plant is including copies of these forms to provide all necessary information regarding the Plant's emission sources' applicability to these federal NSPS and NESHAP regulations. The only changes incorporated into these forms are the addition of the new sources recently permitted under PBR 170877 and 171059, as listed on Form OP-2.

Form OP-CRO1
Certification by Responsible Official
Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information		
RN: 100220847	CN: 600363683	Account No.: ND-0014-S
Permit No.: O1119	Project No.: NA	
Area Name: Maryneal Cement Plant	Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA	

II. Certification Type *(Please mark the appropriate box)*

☒ Responsible Official ☐ Duly Authorized Representative

III. Submittal Type *(Please mark the appropriate box) (Only one response can be accepted per form)*

☐ SOP/TOP Initial Permit Application ☐ Update to Permit Application

☐ GOP Initial Permit Application ☒ Permit Revision, Renewal, or Reopening

☐ Other: _____

IV. Certification of Truth

This certification does not extend to information which is designated by the TCEQ as information for reference only.

I, Michael McHugh certify that I am the RO
(Certifier Name printed or typed) *(RO or DAR)*

and that, based on information and belief formed after reasonable inquiry, the statements and information dated during the time period or on the specific date(s) below, are true, accurate, and complete:

Note: Enter Either a Time Period OR Specific Date(s) for each certification. This section must be completed. The certification is not valid without documentation date(s).

Time Period: From _____ to _____
Start Date *End Date*

Specific Dates: 5-2-23 _____ _____ _____ _____ _____
Date 1 *Date 2* *Date 3* *Date 4* *Date 5* *Date 6*

Signature: _____ Signature Date: 5-2-23

Title: Plant Manager

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 1)
Texas Commission on Environmental Quality

Please print or type all information. Direct any questions regarding this application form to the Air Permits Division at (512) 239-1250or to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division (MC 163), P.O. Box 13087, Austin, Texas 78711-3087.

I.	**Company Identifying Information**					
A.	Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA					
B.	Customer Reference Number (CN): CN600363683					
C.	Submittal Date *(mm/dd/yyyy): 05/02/2023*					
II.	**Site Information**					
A.	Site Name: Maryneal Cement Plant					
B.	Regulated Entity Reference Number (RN): RN100220847					
C.	Indicate affected state(s) required to review permit application: *(Check the appropriate box[es].)*					
☐ AR	☐ CO	☐ KS	☐ LA	☐ NM	☐ OK	☒ N/A
D.	Indicate all pollutants for which the site is a major source based on the site's potential to emit: *(Check the appropriate box[es].)*					
☒ VOC	☒ NO_X	☒ SO_2	☒ PM_{10}	☒ CO	☐ Pb	☒ HAPS
Other:						
E.	Is the site a non-major source subject to the Federal Operating Permit Program?					☐ YES ☒ NO
F.	Is the site within a local program area jurisdiction?					☐ YES ☒ NO
G.	Will emissions averaging be used to comply with any Subpart of 40 CFR Part 63?					☐ YES ☒ NO
H.	Indicate the 40 CFR Part 63 Subpart(s) that will use emissions averaging:					
III.	**Permit Type**					
A.	Type of Permit Requested: *(Select only one response)*					
☒ Site Operating Permit (SOP)	☐ Temporary Operating Permit (TOP)	☐ General Operating Permit (GOP)				

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 2)
Texas Commission on Environmental Quality

IV.	**Initial Application Information** *(Complete for Initial Issuance Applications Only.)*	
A.	Is this submittal an abbreviated or a full application?	☐ Abbreviated ☒ Full
B.	If this is a full application, is the submittal a follow-up to an abbreviated application?	☐ YES ☒ NO
C.	If this is an abbreviated application, is this an early submittal for a combined SOP and Acid Rain permit?	☐ YES ☐ NO
D.	Has an electronic copy of this application been submitted (or is being submitted) to EPA? (Refer to the form instructions for additional information.)	☒ YES ☐ NO
V.	**Confidential Information**	
A.	Is confidential information submitted in conjunction with this application?	☐ YES ☒ NO
VI.	**Responsible Official (RO) Identifying Information**	
RO Name Prefix: (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)		
RO Full Name: Michael McHugh		
RO Title: Plant Manager		
Employer Name: Lone Star Industries, Inc. dba Buzzi Unicem USA		
Mailing Address: 202 CR 306		
City: Maryneal		
State: TX		
ZIP Code: 79535		
Territory:		
Country: USA		
Foreign Postal Code:		
Internal Mail Code:		
Telephone No.: 325-766-6068 (ext.1127)		
Fax No.:		
Email: Michael.mchugh@buzziunicemusa.com		

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 3)
Texas Commission on Environmental Quality

VII.	**Technical Contact Identifying Information** *(Complete if different from RO.)*
Technical Contact Name Prefix: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.)	
Technical Contact Full Name: Hannah Harris	
Technical Contact Title: Environmental Engineer	
Employer Name: Lone Star Industries, Inc. dba Buzzi Unicem USA	
Mailing Address: 202 CR 306	
City: Maryneal	
State: TX	
ZIP Code: 79535	
Territory:	
Country: USA	
Foreign Postal Code:	
Internal Mail Code:	
Telephone No.: 325-766-6068 (ext 1141)	
Fax No.:	
Email: hannah.harris@buzziunicemusa.com	
VIII.	**Reference Only Requirements** *(For reference only.)*
A.	State Senator: Charles Perry
B.	State Representative: Stan Lambert
C.	Has the applicant paid emissions fees for the most recent agency fiscal year (Sept. 1 - August 31)? ☒ YES ☐ NO ☐ N/A
D.	Is the site subject to bilingual notice requirements pursuant to 30 TAC § 122.322? ☒ YES ☐ NO
E.	Indicate the alternate language(s) in which public notice is required: Spanish

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 4)
Texas Commission on Environmental Quality

IX.	**Off-Site Permit Request** *(Optional for applicants requesting to hold the FOP and records at an off-site location.)*
A.	Office/Facility Name:
B.	Physical Address:
City:	
State:	
ZIP Code:	
Territory:	
Country:	
Foreign Postal Code:	
C.	Physical Location:
D.	Contact Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
Contact Full Name:	
E.	Telephone No.:
X.	**Application Area Information**
A.	Area Name: Maryneal Cement Plant
B.	Physical Address: 202 County Road 306
City: Maryneal	
State: Texas	
ZIP Code: 79535	
C.	Physical Location: 202 County Road 306, ¾ miles north of Maryneal
D.	Nearest City: Maryneal
E.	State: Texas
F.	ZIP Code: 79535

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 5)
Texas Commission on Environmental Quality

X.	**Application Area Information** ***(continued)***
G.	Latitude (nearest second): 32° 15' 00" N
H.	Longitude (nearest second): 100° 27' 30" W
I.	Are there any emission units that were not in compliance with the applicable requirements identified in the application at the time of application submittal? ☐ YES ☒ NO
J.	Indicate the estimated number of emission units in the application area: 175
K.	Are there any emission units in the application area subject to the Acid Rain Program? ☐ YES ☒ NO
XI.	**Public Notice** *(Complete this section for SOP Applications and Acid Rain Permit Applications only.)*
A.	Name of a public place to view application and draft permit: Maryneal Post Office
B.	Physical Address: 11126 FM 608
City: Maryneal	
ZIP Code: 79535	
C.	Contact Person (Someone who will answer questions from the public during the public notice period):
Contact Name Prefix: (☐ Mr. ☐ Mrs. ☒ Ms. ☐ Dr.):	
Contact Person Full Name: Hannah Harris	
Contact Mailing Address: 202 CR 306	
City: Maryneal	
State: TX	
ZIP Code: 79535	
Territory:	
Country: USA	
Foreign Postal Code:	
Internal Mail Code:	
Telephone No.: 325-766-6068 (ext 1141)	

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 6)
Texas Commission on Environmental Quality

XII. Delinquent Fees and Penalties
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of Attorney General on behalf of the TCEQ are paid in accordance with the "Delinquent Fee and Penalty Protocol."
Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIII. Designated Representative (DR) Identifying Information
DR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
DR Full Name:
DR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

Federal Operating Permit Program
Site Information Summary
Form OP-1 (Page 7)
Texas Commission on Environmental Quality

Complete Sections XIII and XIV for Acid Rain Permit and CSAPR applications only. Please include a copy of the Certificate of Representation submitted to EPA.
XIV. Alternate Designated Representative (ADR) Identifying Information
ADR Name Prefix: (☐ Mr. ☐ Mrs. ☐ Ms. ☐ Dr.)
ADR Full Name:
ADR Title:
Employer Name:
Mailing Address:
City:
State:
ZIP Code:
Territory:
Country:
Foreign Postal Code:
Internal Mail Code:
Telephone No.:
Fax No.:
Email:

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1
Texas Commission on Environmental Quality

Date: May 2023	
Permit No.: O1119	
Regulated Entity No.:RN100220847	
Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA	
For Submissions to EPA	
Has an electronic copy of this application been submitted (or is being submitted) to EPA?	☒ YES ☐ NO
I. Application Type	
Indicate the type of application:	
☒ Renewal	
☐ Streamlined Revision (Must include provisional terms and conditions as explained in the instructions.)	
☐ Significant Revision	
☐ Revision Requesting Prior Approval	
☐ Administrative Revision	
☐ Response to Reopening	
II. Qualification Statement	
For SOP Revisions Only	☒ YES ☐ NO
For GOP Revisions Only	☐ YES ☐ NO

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 1 *(continued)*
Texas Commission on Environmental Quality

III. Major Source Pollutants (Complete this section if the permit revision is due to a change at the site or change in regulations.)						
Indicate all pollutants for which the site is a major source based on the site's potential to emit: *(Check the appropriate box[es].)*						
☐ VOC	☐ NO_X	☐ SO_2	☐ PM_{10}	☐ CO	☐ Pb	☐ HAP
Other:						
IV. Reference Only Requirements *(For reference only)*						
Has the applicant paid emissions fees for the most recent agency fiscal year (September 1 - August 31)?					☒ YES ☐ NO ☐ N/A	
V. Delinquent Fees and Penalties						
Notice: This form will not be processed until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ are paid in accordance with the Delinquent Fee and penalty protocol.						

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality

Date: May 2023
Permit No.: O1119
Regulated Entity No.: RN100220847
Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group ID No.	Process Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions
1	MS-A	Yes	S-C-85, S-C-86, S-C-87	OP-SUMR, OP-UA33, OP-REQ3	PBR 170877	Addition of new sources authorized in PBR Registration No. 170877 under PBR 106.261.
2	MS-A	Yes	S23-DC3, S17-DC1, S23-DC1, S23-DC2	OP-SUMR, OP-UA33, OP-REQ3	PBR 171059	Addition of new sources authorized in PBR Registration No. 171059 under PBR 106.144.
3	MS-C	No	GRPSILO23	OP-SUMR	PBR 171059	Addition of new group, GRPSILO23, for all sources under PBR Registration No. 171059.
4	MS-A	No	S-B-4, S-B-12, S-B-13, S-B-14	OP-SUMR OP-UA33	82775, PSDTX1101	Correction of NSR Authorization from Permit 49046 to Permit 82775, PSDTX1101.
5	MS-C	No	NA	OP-SUMR	49046, 5918B, and 7681	Removal of Permits 49046, 5918B, and 7681 from list of NSR Authorization References.
6	MS-C	No	NA	OP-SUMR	122312 and 5918A	Request termination of Permits 122312 and 5918A, and removal of these Permits from list of NSR Authorization References.

Federal Operating Permit Program
Application for Permit Revision/Renewal
Form OP-2-Table 2
Texas Commission on Environmental Quality

Date: May 2023
Permit No.: O1119
Regulated Entity No.: RN100220847
Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA

Using the table below, provide a description of the revision.

Revision No.	Revision Code	New Unit	Unit/Group ID No.	Process Applicable Form	NSR Authorization	Description of Change and Provisional Terms and Conditions
7	MS-C	No	NA	OP-SUMR	106.144/03/14/1997 106.261/12/24/1998 106.261/09/04/2000 106.262/09/04/2000 59/10/04/1995 118/10/04/1995	Removal of PBRs from list of NSR Authorization References.
8	MS-C	No	COALGRP1	OP-MON	NA	Addition of clarification language to Periodic Monitoring Text.
9	MS-C	No	COALGRP2	OP-MON	NA	Addition of clarification language to Periodic Monitoring Text.

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1

Date	Permit No.	Regulated Entity No.
May 2023	O1119	RN100220847

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
A	1	S-C-85	OP-UA33	FM Additives Hopper and Conveyor		106.261/11/01/2003 [170877]	
A	1	S-C-86	OP-UA33	Clinker Cooler Alleviator		106.261/11/01/2003 [170877]	
A	1	S-C-87	OP-UA33	Clinker Cooler FK Pump Hopper		106.261/11/01/2003 [170877]	
A	2	S23-DC3	OP-UA33	Cement Silo #23 Dust Collector		106.144/09/04/2000 [171059]	
A	2	S17-DC1	OP-UA33	Cement Pump Dust Collector		106.144/09/04/2000 [171059]	
A	2	S23-DC1	OP-UA33	Cement Truck Loadout Spout #1		106.144/09/04/2000 [171059]	
A	2	S23-DC2	OP-UA33	Cement Truck Loadout Spout #2		106.144/09/04/2000 [171059]	

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1

Date	Permit No.	Regulated Entity No.
May 2023	O1119	RN100220847

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
	4	S-B-4	UA33	Raw Silo Elevator		82775	PSDTX1101
	4	S-B-12	UA33	BTM Raw Silo, North		82775	PSDTX1101
	4	S-B-13	UA33	BTM Raw Silo, Center		82775	PSDTX1101
	4	S-B-14	UA33	BTM Raw Silo, South		82775	PSDTX1101
D	5	NA	NA	NA		49046	
D	5	NA	NA	NA		5918B	
D	5	NA	NA	NA		7681	
D	6	NA	NA	NA		122312	
D	6	NA	NA	NA		5918A	

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 1

Date	Permit No.	Regulated Entity No.
May 2023	O1119	RN100220847

Unit/Process AI	Unit/Process Revision No.	Unit/Process ID No.	Unit/Process Applicable Form	Unit/Process Name/ Description	Unit/Process CAM	Preconstruction Authorizations 30 TAC Chapter 116/ 30 TAC Chapter 106	Preconstruction Authorizations Title I
D	7	NA	NA	NA		106.144/03/14/1997	
D	7	NA	NA	NA		106.261/12/24/1998	
D	7	NA	NA	NA		106.261/09/04/2000	
D	7	NA	NA	NA		106.262/09/04/2000	
D	7	NA	NA	NA		59/10/04/1995	
D	7	NA	NA	NA		118/10/04/1995	

Texas Commission on Environmental Quality
Federal Operating Permit Program
Individual Unit Summary for Revisions
Form OP-SUMR
Table 2

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Revision No.	ID No.	Applicable Form	Group AI	Group ID No.
3	S23-DC3, S17-DC1, S23-DC1, and S23-DC2	OP-UA33	A	GRPSILO23

Texas Commission on Environmental Quality
Form OP-ACPS
Application Compliance Plan and Schedule

Date: May 2023	Regulated Entity No.: 100220847	Permit No.: O1119
Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA		Area Name: Maryneal Cement Plant

- Part 1 of this form must be submitted with all initial FOP applications and renewal applications.
- The Responsible Official must use Form OP-CRO1 (Certification by Responsible Official) to certify information contained in this form in accordance with 30 TAC § 122.132(d)(8).

Part 1

A.	**Compliance Plan — Future Activity Committal Statement**	
The *Responsible Official* commits, utilizing reasonable effort, to the following: As the responsible official it is my intent that all emission units shall continue to be in compliance with all applicable requirements they are currently in compliance with, and all emission units shall be in compliance by the compliance dates with any applicable requirements that become effective during the permit term.		
B.	**Compliance Certification - Statement for Units in Compliance* (Indicate response by entering an "X" in the appropriate column)**	
1.	With the exception of those emission units listed in the Compliance Schedule section of this form (Part 2, below), and based, at minimum, on the compliance method specified in the associated applicable requirements, are all emission units addressed in this application in compliance with all their respective applicable requirements as identified in this application?	☒ YES ☐ NO
2.	Are there any non-compliance situations addressed in the Compliance Schedule Section of this form (Part 2)?	☐ YES ☒ NO
3.	If the response to Item B.2, above, is "Yes," indicate the total number of Part 2 attachments included in this submittal. *(For reference only)*	
*	*For Site Operating Permits (SOPs), the complete application should be consulted for applicable requirements and their corresponding emission units when assessing compliance status.* *For General Operating Permits (GOPs), the application documentation, particularly Form OP-REQ1 should be consulted as well as the requirements contained in the appropriate General Permits portion of 30 TAC Chapter 122.* *Compliance should be assessed based, at a minimum, on the required monitoring, testing, record keeping, and/or reporting requirements, as appropriate, associated with the applicable requirement in question.*	

Permit By Rule Supplemental Table (Page 1)
Table A: Registered Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
May 2023	O1119	RN100220847

Unit ID No.	Registration No.	PBR No.	Registration Date
S-C-85, S-C-86, S-C-87	170877	106.261	12/02/2022
S23-DC3, S17-DC1, S23-DC1, S23-DC2 (GRPSILO23)	171059	106.144	12/14/2022

Permit By Rule Supplemental Table (Page 2)
Table B: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
May 2023	O1119	RN100220847

Unit ID No.	PBR No.	Version No./Date
L-53 (Quarry Vehicle Diesel Tank)	106.478	03/14/1997

Permit By Rule Supplemental Table (Page 3)
Table C: Claimed (not registered) Permits by Rule (30 TAC Chapter 106) for Insignificant Sources for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
May 2023	O1119	RN100220847

PBR No.	Version No./Date
106.102 (Comfort Heating)	11/15/1996
106.472 (Organic and Inorganic Liquid Loading and Unloading)	03/14/1997
106.473 (Organic and Inorganic Liquid Loading and Unloading)	03/14/1997
106.227 (Soldering, Brazing, Welding)	03/14/1997
106.263 (Enclosed Outdoor Dry Abrasive Blasting and Maintenance Painting)	11/01/2001
106.265 (Handheld and Manually Operated Machines used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding, sawing, surface grinding, etc.)	03/14/1997
106.371 (Cooling-Water Units)	03/14/1997
106.454 (Degreasing Units)	03/14/1997
106.511 (Portable and Emergency Engines and Turbines)	03/14/1997
106.532 (Sludge Management)	03/14/1997
106.532 (Organic chemical usage for water treatment)	03/14/1997

Permit By Rule Supplemental Table (Page 4)
Table D: Monitoring Requirements for registered and claimed PBRs for the Application Area
Texas Commission on Environmental Quality

Date	Permit Number	Regulated Entity Number
May 2023	O1119	RN100220847

Unit ID No.	PBR No.	Version No./Date Or Registration No.	Monitoring Requirement
S-C-85, S-C-86, S-C-87	106.261	170877	Recordkeeping of operations sufficient for calculating emissions on an annual basis.
S23-DC3, S17-DC1, S23-DC1, S23-DC2 (Group GRPSILO23)	106.144	171059	Recordkeeping of operations sufficient for calculating emissions on an annual basis.
L-53 (Quarry Vehicle Diesel Tank)	106.478	03/14/1997	Recordkeeping of operations sufficient for calculating emissions on an annual basis.

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 2)
Federal Operating Permit Program
Table 2a: Title 40 Code of Federal Regulations (40 CFR Part 60)
Subpart OOO: Standards of Performance for Nonmetallic Mineral Processing Plants

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	Construction/Modification Date	Subpart Applicability	Facility Type	Replacement Type
A-26	60OOO	08+	NONE	CRUSHR	OTHER
A-27	60OOO	08+	NONE	SCRNOP	OTHER

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 3)
Federal Operating Permit Program
Table 2b: Title 40 Code of Federal Regulations (40 CFR Part 60)
Subpart OOO: Standards of Performance for Nonmetallic Mineral Processing Plants

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	Capture System	Wet Suppression	Exhaust Gas Velocity	Control Device Type	Control Device ID No.
A-26	60OOO	CAP			BH	C-A-26
A-27	60OOO	CAP			BH	C-A-27

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 4)
Federal Operating Permit Program
Table 2c: Title 40 Code of Federal Regulations (40 CFR Part 60)
Subpart OOO: Standards of Performance for Nonmetallic Mineral Processing Plants

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	Baghouse Monitoring	Baghouse Operation	PM Concentration Method	Emissions Interference
A-26	60OOO	M22A7		M5A3	
A-27	60OOO	M22A7		M5A3	

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 5)
Federal Operating Permit Program

Table 3a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart F: Standards of Performance for Portland Cement Plants

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	Construction/Modification Date	Facility Type	Kiln/Clinker Cooler Combined	Alternate PM Limit	Kiln Alkali Bypass
GRPALTFUEL	60F	08+	CVTP			
GRPBAG	60F	08+	BAG			
GRPCARBONB	60F	08+	CVTP			
GRPCLINK	60F	08+	CVTP			
GRPCOOLER	60F	08+	CLINK			
GRPFINMILL	60F	08+	FINISH			
GRPKILN	60F	08+	KILN	NO		NO
GRPKILNFEED	60F	08+	CVTP			
GRPLOAD	60F	08+	LOAD			
GRPRAWMILL	60F	08+	CVTP			

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 5)
Federal Operating Permit Program

Table 3a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart F: Standards of Performance for Portland Cement Plants

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	Construction/Modification Date	Facility Type	Kiln/Clinker Cooler Combined	Alternate PM Limit	Kiln Alkali Bypass
GRPRAWSILO	60F	08+M	RSTOR			
GRPRAWSILO2	60F	08+	CVTP			
GRPSILO	60F	08+	FNSTO			
GRPTRANSFR	60F	08+	CVTP			
S-C-85	60F	08+	CVTP			
S-C-86	60F	08+	CVTP			
S-C-87	60F	08+	CVTP			
GRPSILO23	60F	08+	LOAD			

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 6)
Federal Operating Permit Program
Table 3b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart F: Standards of Performance for Portland Cement Plants

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	TBLDS	EPA Alternative Requirements	EPA Alternative Requirements ID	RM/FM Emissions Monitoring System
GRPALTFUEL	60F	NO	NO		
GRPBAG	60F	NO	NO		
GRPCARBONB	60F	NO	NO		
GRPCLINK	60F	NO	NO		
GRPCOOLER	60F	NO	NO		
GRPFINMILL	60F	NO	NO		DAYVIS
GRPKILN	60F	NO	NO		
GRPKILNFEED	60F	NO	NO		
GRPLOAD	60F	NO	NO		
GRPRAWMILL	60F	NO	NO		

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 6)
Federal Operating Permit Program
Table 3b: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart F: Standards of Performance for Portland Cement Plants

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	TBLDS	EPA Alternative Requirements	EPA Alternative Requirements ID	RM/FM Emissions Monitoring System
GRPRAWSILO	60F	NO	NO		
GRPRAWSILO2	60F	NO	NO		
GRPSILO	60F	NO	NO		
GRPTRANSFR	60F	NO	NO		
S-C-85	60F	NO	NO		
S-C-86	60F	NO	NO		
S-C-87	60F	NO	NO		
GRPSILO23	60F	NO	NO		

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 7)
Federal Operating Permit Program
Table 3c: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart F: Standards of Performance for Portland Cement Plants

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	90% Reduction
GRPKILN	60F	NO

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 10)
Federal Operating Permit Program
Table 6a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart LLL: National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	Major Source	Facility Type	Burning Hazardous Waste	Source Classification	98% Weight Reduction
GRPALTFUEL	63LLL	YES	MISC			
GRPBAG	63LLL	YES	MISC			
GRPCARBONB	63LLL	YES	MISC			
GRPCLINK	63LLL	YES	MISC			
GRPCOOLER	63LLL	YES	COOL			
GRPFINMILL	63LLL	YES	RFMILL			
GRPKILN	63LLL	YES	KILN1	NO	BRNS2	NO
GRPKILNFEED	63LLL	YES	MISC			
GRPLOAD	63LLL	YES	MISC			
GRPRAWMILL	63LLL	YES	MISC			

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 10)
Federal Operating Permit Program
Table 6a: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart LLL: National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	Major Source	Facility Type	Burning Hazardous Waste	Source Classification	98% Weight Reduction
GRPRAWSILO	63LLL	YES	MISC			
GRPRAWSILO2	63LLL	YES	MISC			
GRPSILO	63LLL	YES	MISC			
GRPTRANSFR	63LLL	YES	MISC			
GRPCOALML	63LLL	YES	MISC			
S-C-85	63LLL	YES	MISC			
S-C-86	63LLL	YES	MISC			
S-C-87	63LLL	YES	MISC			
GRPSILO23	63LLL	YES	MISC			

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 11)
Federal Operating Permit Program
Table 6b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart LLL: National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	Alkali By-Pass	Alternate Opacity Monitoring	Raw/Finish Mill Opacity	Monovent	COM Feasibility	Multiple Stacks	COM
GRPALTFUEL	63LLL		NO					
GRPBAG	63LLL		NO					
GRPCARBONB	63LLL		NO					
GRPCLINK	63LLL		NO					
GRPCOOLER	63LLL		NO		NO	NO	NO	NO
GRPFINMILL	63LLL		NO	VIS				
GRPKILN	63LLL	NO	NO		NO	NO	NO	NO
GRPKILNFEED	63LLL		NO					
GRPLOAD	63LLL		NO					
GRPRAWMILL	63LLL		NO					

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 11)
Federal Operating Permit Program
Table 6b: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart LLL: National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	Alkali By-Pass	Alternate Opacity Monitoring	Raw/Finish Mill Opacity	Monovent	COM Feasibility	Multiple Stacks	COM
GRPRAWSILO	63LLL		NO					
GRPRAWSILO2	63LLL		NO					
GRPSILO	63LLL		NO					
GRPTRANSFR	63LLL		NO					
GRPCOALML	63LLL		NO					
S-C-85	63LLL		NO					
S-C-86	63LLL		NO					
S-C-87	63LLL		NO					
GRPSILO23	63LLL		NO					

Texas Commission on Environmental Quality
Mineral Processing Plant Attributes
Form OP-UA33 (Page 12)
Federal Operating Permit Program
Table 6c: Title 40 Code of Federal Regulations Part 63 (40 CFR Part 63)
Subpart LLL: National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry

Date	Permit No.	Regulated Entity No.
May 2023	O1119	100220847

Unit ID No.	SOP Index No.	Performance Test Temperature	Carbon Injection	Control Device	Alternate Hg Monitoring	Hg AMR ID No.	Alternate D/F Monitoring	D/F AMR ID No.
GRPKILN	63LLL	204-	NO	NO	NONE		NONE	

Coal Preparation Plant Attributes
Form OP-UA64 (Page 1)
Federal Operating Permit Program

Table 1a: Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60)
Subpart Y: Standards of Performance for Coals Preparation Plants

Date: May 2023	Permit No.: O1119	Regulated Entity No.: 100220847
Area Name: Maryneal Cement Plant		Customer Reference No.: 600363683

Unit ID No.	SOP Index No.	Affected Facility	Covered Under Another Subpart	Construction/ Reconstruction/Modification Date	Control Device Type	Control Device ID No.	Compliance Option	Digital Opacity
G-26	60Y	MECHVNT		C08+	FABFLT	C-G-26		
G-27	60Y	MECHVNT		C08+	FABFLT	C-G-27		
G-28	60Y	MECHVNT		C08+	FABFLT	C-G-28		
GRPCOAL1	60Y	CLSYST		74-08				
GRPCOALNEW	60Y	CLSYST		C08+			255B2	
GRPCOAL2	60Y	MECHVNT		74-08				

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 3)
Federal Operating Permit Program
Table 1c: CAM/PM Case-By-Case Additions

I. Identifying Information		
Account No.: ND-0014-S	RN No.: 100220847	CN: 600363683
Permit No: O1119	Project No.: Not Applicable	
Area Name: Maryneal Cement Plant		
Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 8		
Unit/EPN/Group/Process ID No.: GRPCOAL1		
Applicable Form: UA64		
III. Applicable Regulatory Requirement		
Name: NSPS Subpart Y		
SOP/GOP Index No.: 60Y1		
Pollutant: PM (Opacity)		
Main Standard: 60.254(a)		
Monitoring Type: PM		
Unit Size:		
Deviation Limit: Opacity greater than 20%		
IV. Control Device Information		
Control Device ID No.:		
Device Type:		
V. CAM Case-by-case		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator: Opacity	Minimum Frequency: Once per month	
Averaging Period: Six-minutes		

I.	Identifying Information

Periodic Monitoring Text: When coal is being processed, opacity shall be monitored, by a certified observer, for at least one, six-minute period in accordance with Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9. Any opacity readings above the deviation limit shall be reported as a deviation.

Texas Commission on Environmental Quality
Monitoring Requirements
Form OP-MON (Page 3)
Federal Operating Permit Program
Table 1c: CAM/PM Case-By-Case Additions

I. Identifying Information		
Account No.: ND-0014-S	RN No.: 100220847	CN: 600363683
Permit No: O1119	Project No.: Not Applicable	
Area Name: Maryneal Cement Plant		
Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA		
II. Unit/Emission Point/Group/Process Information		
Revision No.: 9		
Unit/EPN/Group/Process ID No.: GRPCOAL2		
Applicable Form: UA64		
III. Applicable Regulatory Requirement		
Name: NSPS Subpart Y		
SOP/GOP Index No.: 60Y2		
Pollutant: PM (Opacity)		
Main Standard: 60.254(a)		
Monitoring Type: PM		
Unit Size:		
Deviation Limit: Opacity greater than 20%		
IV. Control Device Information		
Control Device ID No.:		
Device Type:		
V. CAM Case-by-case		
Indicator:		
Minimum Frequency:		
Averaging Period:		
QA/QC Procedures:		
Verification Procedures:		
Representative Date:		
VI. Periodic Monitoring Case-by-case		
Indicator: Opacity	Minimum Frequency: Once per month	
Averaging Period: Six-minutes		

I. Identifying Information
Periodic Monitoring Text: When coal is being processed, opacity shall be monitored, by a certified observer, for at least one, six-minute period in accordance with Title 40 Code of Federal Regulations Part 60 (40 CFR Part 60), Appendix A, Test Method 9. Any opacity readings above the deviation limit shall be reported as a deviation.

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

Date:	May 2023
Permit No.:	O1119
RN No.:	100220847

For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

Form OP-REQ1: Page 1			
I.	**Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter**		
	A.	**Visible Emissions**	
♦	1.	The application area includes stationary vents constructed on or before January 31, 1972.	☒YES ☐NO
♦	2.	The application area includes stationary vents constructed after January 31, 1972. *If the responses to Questions I.A.1 and I.A.2 are both "NO," go to Question I.A.6.* *If the response to Question I.A.1 is "NO" and the response to Question I.A.2 is "YES," go to Question I.A.4.*	☒YES ☐NO
♦	3.	The application area is opting to comply with the requirements for stationary vents constructed after January 31, 1972 for vents in the application area constructed on or before January 31, 1972.	☒YES ☐NO
♦	4.	All stationary vents are addressed on a unit specific basis.	☒YES ☐NO
♦	5.	Test Method 9 (40 CFR Part 60, Appendix A, Method 9 - Visual Determination of the Opacity of Emissions from Stationary Sources) is used to determine opacity of emissions in the application area.	☒YES ☐NO
♦	6.	The application area includes structures subject to 30 TAC § 111.111(a)(7)(A).	☒YES ☐NO
♦	7.	The application area includes sources, other than those specified in 30 TAC § 111.111(a)(1), (4), or (7), subject to 30 TAC § 111.111(a)(8)(A).	☒YES ☐NO
♦	8.	Emissions from units in the application area include contributions from uncombined water.	☒YES ☐NO
♦	9.	The application area is located in the City of El Paso, including Fort Bliss Military Reservation, and includes solid fuel heating devices subject to 30 TAC § 111.111(c).	☐YES ☒NO ☐N/A

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

Date:	May 2023
Permit No.:	O1119
RN No.:	100220847

For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

Form OP-REQ1: Page 2				
I.	**Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)**			
	B.	**Materials Handling, Construction, Roads, Streets, Alleys, and Parking Lots**		
	1.	Items a - d determines applicability of any of these requirements based on geographical location.		
♦		a.	The application area is located within the City of El Paso.	☐YES ☒NO
♦		b.	The application area is located within the Fort Bliss Military Reservation, except areas specified in 30 TAC § 111.141.	☐YES ☒NO
♦		c.	The application area is located in the portion of Harris County inside the loop formed by Beltway 8.	☐YES ☒NO
♦		d.	The application area is located in the area of Nueces County outlined in Group II state implementation plan (SIP) for inhalable particulate matter adopted by the TCEQ on May 13, 1988.	☐YES ☒NO
		If there is any "YES" response to Questions I.B.1.a - d, answers Questions I.B.2.a - d. If all responses to Questions I.B.1.a-d are "NO," go to Section I.C.		
	2.	Items a - d determine the specific applicability of these requirements.		
♦		a.	The application area is subject to 30 TAC § 111.143.	☐YES ☐NO
♦		b.	The application area is subject to 30 TAC § 111.145.	☐YES ☐NO
♦		c.	The application area is subject to 30 TAC § 111.147.	☐YES ☐NO
♦		d.	The application area is subject to 30 TAC § 111.149.	☐YES ☐NO
	C.	**Emissions Limits on Nonagricultural Processes**		
♦	1.	The application area includes a nonagricultural process subject to 30 TAC § 111.151.		☒YES ☐NO
	2.	The application area includes a vent from a nonagricultural process that is subject to additional monitoring requirements. *If the response to Question I.C.2 is "NO," go to Question I.C.4.*		☒YES ☐NO
	3.	All vents from nonagricultural process in the application area are subject to additional monitoring requirements.		☒YES ☐NO

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

Date:	May 2023
Permit No.:	O1119
RN No.:	100220847

For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

Form OP-REQ1: Page 3			
I.	**Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)**		
	C.	**Emissions Limits on Nonagricultural Processes (continued)**	
	4.	The application area includes oil or gas fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(c).	☐YES ☒NO
	5.	The application area includes oil or gas fuel-fired steam generators that are subject to additional monitoring requirements. *If the response to Question I.C.5 is "NO," go to Question I.C.7.*	☐YES ☒NO
	6.	All oil or gas fuel-fired steam generators in the application area are subject to additional monitoring requirements.	☐YES ☐NO
	7.	The application area includes solid fossil fuel-fired steam generators subject to 30 TAC §§ 111.153(a) and 111.153(b).	☐YES ☒NO
	8.	The application area includes solid fossil fuel-fired steam generators that are subject to additional monitoring requirements. *If the response to Question I.C.8 is "NO," go to Section I.D.*	☐YES ☒NO
	9.	All solid fossil fuel-fired steam generators in the application area are subject to additional monitoring requirements.	☐YES ☐NO
	D.	**Emissions Limits on Agricultural Processes**	
	1.	The application area includes agricultural processes subject to 30 TAC § 111.171.	☐YES ☒NO
	E.	**Outdoor Burning**	
♦	1.	Outdoor burning is conducted in the application area. *If the response to Question I.E.1 is "NO," go to Section II.*	☐YES ☒NO
♦	2.	Fire training is conducted in the application area and subject to the exception provided in 30 TAC § 111.205.	☐YES ☐NO
♦	3.	Fires for recreation, ceremony, cooking, and warmth are used in the application area and subject to the exception provided in 30 TAC § 111.207.	☐YES ☐NO
♦	4.	Disposal fires are used in the application area and subject to the exception provided in 30 TAC § 111.209.	☐YES ☐NO

Texas Commission on Environmental Quality
Application Area-Wide Applicability Determinations and General Information
Form OP-REQ1
Federal Operating Permit Program

Date:	May 2023
Permit No.:	O1119
RN No.:	100220847

For SOP applications, answer ALL questions unless otherwise directed.
♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

Form OP-REQ1: Page 4			
I.	**Title 30 TAC Chapter 111 - Control of Air Pollution from Visible Emissions and Particulate Matter (continued)**		
	E.	**Outdoor Burning (continued)**	
♦	5.	Prescribed burning is used in the application area and subject to the exception provided in 30 TAC § 111.211.	☐YES ☐NO
♦	6.	Hydrocarbon burning is used in the application area and subject to the exception provided in 30 TAC § 111.213.	☐YES ☐NO
♦	7.	The application area has received the TCEQ Executive Director approval of otherwise prohibited outdoor burning according to 30 TAC § 111.215.	☐YES ☐NO
II.	**Title 30 TAC Chapter 112 - Control of Air Pollution from Sulfur Compounds**		
	A.	**Temporary Fuel Shortage Plan Requirements**	
	1.	The application area includes units that are potentially subject to the temporary fuel shortage plan requirements of 30 TAC §§ 112.15 - 112.18.	☐YES ☒NO
III.	**Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds**		
	A.	**Applicability**	
♦	1.	The application area is located in the Houston/Galveston/Brazoria area, Beaumont/Port Arthur area, Dallas/Fort Worth area, El Paso area, or a covered attainment county as defined by 30 TAC § 115.10. *See instructions for inclusive counties. If the response to Question III.A.1 is "NO," go to Section IV.*	☐YES ☒NO
	B.	**Storage of Volatile Organic Compounds**	
♦	1.	The application area includes storage tanks, reservoirs, or other containers capable of maintaining working pressure sufficient at all times to prevent any VOC vapor or gas loss to the atmosphere.	☐YES ☐NO

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III.	**Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)**		
	C.	**Industrial Wastewater**	
	1.	The application area includes affected VOC wastewater streams of an affected source category, as defined in 30 TAC § 115.140. *If the response to Question III.C.1 is "NO" or "N/A," go to Section III.D.*	☐YES ☐NO ☐N/A
	2.	The application area is located at a petroleum refinery in the Beaumont/Port Arthur or Houston/Galveston/Brazoria area. *If the response to Question III.C.2 is "YES" and the refinery is in the Beaumont/Port Arthur area, go to Section III.D.*	☐YES ☐NO
	3.	The application area is complying with the provisions of 40 CFR Part 63, Subpart G, as an alternative to complying with this division (relating to Industrial Wastewater). *If the response to Question III.C.3 is "YES," go to Section III.D.*	☐YES ☐NO
	4.	The application area is located at a plant with an annual VOC loading in wastewater, as determined in accordance with 30 TAC § 115.148, less than or equal to 10 Mg (11.03 tons). *If the response to Question III.C.4 is "YES," go to Section III.D.*	☐YES ☐NO
	5.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that are subject to the control requirements of 30 TAC § 115.142(1).	☐YES ☐NO
	6.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that handle streams chosen for exemption under 30 TAC § 115.147(2).	☐YES ☐NO
	7.	The application area includes wastewater drains, junction boxes, lift stations, or weirs that have an executive director approved exemption under 30 TAC § 115.147(4).	☐YES ☐NO
	D.	**Loading and Unloading of VOCs**	
♦	1.	The application area includes VOC loading operations.	☐YES ☐NO
♦	2.	The application area includes VOC transport vessel unloading operations. *For GOP applications, if the responses to Questions III.D.1 - D.2 are "NO," go to Section III.E.*	☐YES ☐NO

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III.	**Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)**		
	D.	**Loading and Unloading of VOCs (continued)**	
♦	3.	Transfer operations at motor vehicle fuel dispensing facilities are the only VOC transfer operations conducted in the application area.	☐YES ☐NO
	E.	**Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities**	
♦	1.	The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a tank-truck tank into a stationary storage container. *If the response to Question III.E.1 is "NO," go to Section III.F.*	☐YES ☐NO
♦	2.	Transfers to stationary storage containers used exclusively for the fueling of agricultural implements are the only transfer operations conducted at facilities in the application area.	☐YES ☐NO
♦	3.	All transfers at facilities in the application area are made into stationary storage containers with internal floating roofs, external floating roofs, or their equivalent. *If the response to Question III.E.2 and/or E.3 is "YES," go to Section III.F.*	☐YES ☐NO
♦	4.	The application area is located in a covered attainment county as defined in 30 TAC § 115.10. *If the response to Question III.E.4 is "NO," go to Question III.E.9.*	☐YES ☐NO
♦	5.	Stationary gasoline storage containers with a nominal capacity less than or equal to 1,000 gallons are located at the facility.	☐YES ☐NO
♦	6.	Stationary gasoline storage containers with a nominal capacity greater than 1,000 gallons are located at the facility.	☐YES ☐NO
♦	7.	At facilities located in covered attainment counties other than Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed less than 100,000 gallons of gasoline in a calendar month after October 31, 2014. *If the response to Question III.E.7 is "YES," go to Section III.F.*	☐YES ☐NO

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III.	**Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)**		
	E.	**Filling of Gasoline Storage Vessels (Stage I) for Motor Vehicle Fuel Dispensing Facilities (continued)**	
♦	8.	At facilities located in Bastrop, Bexar, Caldwell, Comal, Guadalupe, Hays, Travis, Williamson, or Wilson County, transfers are made to stationary storage tanks greater than 1000 gallons located at a facility which has dispensed no more than 25,000 gallons of gasoline in a calendar month after December 31, 2004. *If the response to Question III.E.8 is "YES," go to Section III.F.*	☐YES ☐NO
♦	9.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed no more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	☐YES ☐NO
♦	10.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which has dispensed more than 10,000 gallons of gasoline in any calendar month after January 1, 1991 and for which construction began prior to November 15, 1992.	☐YES ☐NO
♦	11.	Transfers are made to stationary storage tanks located at a motor vehicle fuel dispensing facility which commenced construction on or after November 15, 1992.	☐YES ☐NO
♦	12.	At facilities located in Ellis, Johnson, Kaufman, Parker, or Rockwall County, transfers are made to stationary storage tanks located at a facility which has dispensed at least 10,000 gallons of gasoline but less than 125,000 gallons of gasoline in a calendar month after April 30, 2005.	☐YES ☐NO
	F.	**Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only)**	
♦	1.	Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(a)(1)(C) or 115.224(2) within the application area.	☐YES ☐NO ☐N/A

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III.	**Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)**		
	F.	**Control of VOC Leaks from Transport Vessels (Complete this section for GOP applications for GOPs 511, 512, 513 and 514 only) (continued)**	
♦	2.	Tank-truck tanks are filled with non-gasoline VOCs having a TVP greater than or equal to 0.5 psia under actual storage conditions at a facility subject to 30 TAC § 115.214(a)(1)(C) within the application area.	☐YES ☐NO ☐N/A
♦	3.	Tank-truck tanks are filled with, or emptied of, gasoline at a facility that is subject to 30 TAC § 115.214(b)(1)(C) or 115.224(2) within the application area.	☐YES ☐NO ☐N/A
	G.	**Control of Vehicle Refueling Emissions (Stage II) at Motor Vehicle Fuel Dispensing Facilities**	
♦	1.	The application area includes one or more motor vehicle fuel dispensing facilities and gasoline is transferred from a stationary storage container into motor vehicle fuel tanks. *If the response to Question III.G.1 is "NO" or "N/A," go to Section III.H.*	☐YES ☐NO ☐N/A
♦	2.	The application area includes facilities that began construction on or after November 15, 1992 and prior to May 16, 2012.	☐YES ☐NO
♦	3.	The application area includes facilities that began construction prior to November 15, 1992. *If the responses to Questions III.G.2 and Question III.G.3 are both "NO," go to Section III.H.*	☐YES ☐NO
♦	4.	The application area includes only facilities that have a monthly throughput of less than 10,000 gallons of gasoline.	☐YES ☐NO
♦	5.	The decommissioning of all Stage II vapor recovery control equipment located in the application area has been completed and the decommissioning notice submitted.	☐YES ☐NO ☐N/A

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III.	**Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)**		
	H.	**Control Of Reid Vapor Pressure (RVP) of Gasoline**	
♦	1.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline that may ultimately be used in a motor vehicle in El Paso County. *If the response to Question III.H.1 is "NO" or "N/A," go to Section III.I.*	☐YES ☐NO ☐N/A
♦	2.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline that will be used exclusively for the fueling of agricultural implements.	☐YES ☐NO
♦	3.	The application area includes a motor vehicle fuel dispensing facility.	☐YES ☐NO
♦	4.	The application area includes stationary tanks, reservoirs, or other containers holding gasoline and having a nominal capacity of 500 gallons or less.	☐YES ☐NO
	I.	**Process Unit Turnaround and Vacuum-Producing Systems in Petroleum Refineries**	
	1.	The application area is located at a petroleum refinery.	☐YES ☐NO
	J.	**Surface Coating Processes (Complete this section for GOP applications only.)**	
♦	1.	Surface coating operations (other than those performed on equipment located on-site and in-place) that meet the exemption specified in 30 TAC § 115.427(3)(A) or 115.427(7) are performed in the application area.	☐YES ☐NO ☐N/A

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III.	**Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)**		
	K.	**Cutback Asphalt**	
	1.	Conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots, is used or specified for use in the application area by a state, municipal, or county agency. *If the response to Question III.K.1 is "N/A," go to Section III.L.*	☐YES ☐NO ☐N/A
	2.	The use, application, sale, or offering for sale of conventional cutback asphalt containing VOC solvents for the paving of roadways, driveways, or parking lots occurs in the application area.	☐YES ☐NO ☐N/A
	3.	Asphalt emulsion is used or produced within the application area.	☐YES ☐NO
	4.	The application area is using an alternate control requirement as specified in 30 TAC § 115.513. *If the response to Question III.K.4 is "NO," go to Section III.L.*	☐YES ☐NO
	5.	The application area uses, applies, sells, or offers for sale asphalt concrete, made with cutback asphalt, that meets the exemption specified in 30 TAC § 115.517(1).	☐YES ☐NO
	6.	The application area uses, applies, sells, or offers for sale cutback asphalt that is used solely as a penetrating prime coat.	☐YES ☐NO
	7.	The applicant using cutback asphalt is a state, municipal, or county agency.	☐YES ☐NO
	L.	**Degassing of Storage Tanks, Transport Vessels and Marine Vessels**	
♦	1.	The application area includes degassing operations for stationary, marine, and/or transport vessels. *If the response to Question III.L.1 is "NO" or "N/A," go to Section III.M.*	☐YES ☐NO ☐N/A
♦	2.	Degassing of only ocean-going, self-propelled VOC marine vessels is performed in the application area. *If the response to Question III.L.2 is "YES," go to Section III.M.*	☐YES ☐NO ☐N/A

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III.	**Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)**		
	L.	**Degassing of Storage Tanks, Transport Vessels and Marine Vessels (continued)**	
♦	3.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 1,000,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	☐YES ☐NO ☐N/A
♦	4.	Degassing of stationary VOC storage vessels with a nominal storage capacity of 250,000 gallons or more, or a nominal storage capacity of 75,000 gallons and storing materials with a true vapor pressure greater than 2.6 psia, and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	☐YES ☐NO ☐N/A
♦	5.	Degassing of VOC transport vessels with a nominal storage capacity of 8,000 gallons or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	☐YES ☐NO
♦	6.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) or more and a vapor space partial pressure greater than or equal to 0.5 psia of VOC is performed in the application area.	☐YES ☐NO ☐N/A
♦	7.	Degassing of VOC marine vessels with a nominal storage capacity of 10,000 barrels (420,000 gallons) and a vapor space partial pressure ≥ 0.5 psia that have sustained damage as specified in 30 TAC § 115.547(5) is performed in the application area.	☐YES ☐NO ☐N/A
	M.	**Petroleum Dry Cleaning Systems**	
	1.	The application area contains one or more petroleum dry cleaning facilities that use petroleum based solvents.	☐YES ☐NO ☐N/A

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III.	**Title 30 TAC Chapter 115 - Control of Air Pollution from Volatile Organic Compounds (continued)**		
N.	**Vent Gas Control (Highly-reactive volatile organic compounds (HRVOC)**		
1.	The application area includes one or more vent gas streams containing HRVOC.	☐YES ☐NO ☐N/A	
2.	The application area includes one or more flares that emit or have the potential to emit HRVOC. *If the responses to Questions III.N.1 and III.N.2 are both "NO" or "N/A," go to Section III.O. If the response to Question III.N.1 is "YES," continue with Question III.N.3.*	☐YES ☐NO ☐N/A	
3.	All vent streams in the application area that are routed to a flare contain less than 5.0% HRVOC by weight at all times.	☐YES ☐NO	
4.	All vent streams in the application area that are not routed to a flare contain less than 100 ppmv HRVOC at all times. *If the responses to Questions III.N.3 and III.N.4 are both "NO," go to Section III.O.*	☐YES ☐NO	
5.	The application area contains pressure relief valves that are not controlled by a flare.	☐YES ☐NO	
6.	The application area has at least one vent stream which has no potential to emit HRVOC.	☐YES ☐NO	
7.	The application area has vent streams from a source described in 30 TAC § 115.727(c)(3)(A) - (H).	☐YES ☐NO	
O.	**Cooling Tower Heat Exchange Systems (HRVOC)**		
1.	The application area includes one or more cooling tower heat exchange systems that emit or have the potential to emit HRVOC.	☐YES ☐NO ☐N/A	

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IV.	**Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds**		
	A.	**Applicability**	
♦	1.	The application area is located in the Houston/Galveston/Brazoria, Beaumont/Port Arthur, or Dallas/Fort Worth Eight-Hour area. *For SOP applications, if the response to Question IV.A.1 is "YES," complete Sections IV.B - IV.F and IV.H.* *For GOP applications for GOPs 511, 512, 513, or 514, if the response to Question IV.A.1 is "YES," go to Section IV.F.* *For GOP applications for GOP 517, if the response to Question IV.A.1 is "YES," complete Sections IV.C and IV.F.* *For GOP applications, if the response to Question IV.A.1 is "NO," go to Section VI.*	☐YES ☒NO
	2.	The application area is located in Bexar, Comal, Ellis, Hays, or McLennan County and includes a cement kiln. *If the response to Question IV.A.2 is "YES," go to Question IV.H.1.*	☐YES ☒NO
	3.	The application area includes a utility electric generator in an east or central Texas county. *See instructions for a list of counties included.* *If the response to Question IV.A.3 is "YES," go to Question IV.G.1.* *If the responses to Questions IV.A.1 - 3 are all "NO," go to Question IV.H.1.*	☐YES ☒NO
	B.	**Utility Electric Generation in Ozone Nonattainment Areas**	
	1.	The application area includes units specified in 30 TAC §§ 117.1000, 117.1200, or 117.1300. *If the response to Question IV.B.1 is "NO," go to Question IV.C.1.*	☐YES ☐NO
	2.	The application area is complying with a System Cap in 30 TAC §§ 117.1020 or 117.1220.	☐YES ☐NO

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IV.	**Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)**		
	C.	**Commercial, Institutional, and Industrial Sources in Ozone Nonattainment Areas**	
♦	1.	The application area is located at a site subject to 30 TAC Chapter 117, Subchapter B and includes units specified in 30 TAC §§ 117.100, 117.300, or 117.400. *For SOP applications, if the response to Question IV.C.1 is "NO," go to Question IV.D.1. For GOP applications for GOP 517, if the response to Question IV.C.1 is "NO," go to Section IV.F.*	☐YES ☐NO
♦	2.	The application area is located at a site that was a major source of NO_X before November 15, 1992.	☐YES ☐NO ☐N/A
♦	3.	The application area includes an electric generating facility required to comply with the System Cap in 30 TAC § 117.320.	☐YES ☐NO
	D.	**Adipic Acid Manufacturing**	
	1.	The application area is located at, or part of, an adipic acid production unit.	☐YES ☐NO ☐N/A
	E.	**Nitric Acid Manufacturing - Ozone Nonattainment Areas**	
	1.	The application area is located at, or part of, a nitric acid production unit.	☐YES ☐NO ☐N/A
	F.	**Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines**	
♦	1.	The application area is located at a site that is a minor source of NO_X in the Houston/Galveston/Brazoria or Dallas/Fort Worth Eight-Hour areas (except for Wise County). *For SOP applications, if the response to Question IV.F.1 is "NO," go to Question IV.G.1. For GOP applications, if the response to Question IV.F.1 is "NO," go to Section VI.*	☐YES ☐NO
♦	2.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(a).	☐YES ☐NO
♦	3.	The application area is located in the Houston/Galveston/Brazoria area and has units that qualify for an exemption under 30 TAC § 117.2003(b).	☐YES ☐NO

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IV.	**Title 30 TAC Chapter 117 - Control of Air Pollution from Nitrogen Compounds (continued)**		
	F.	**Combustion Control at Minor Sources in Ozone Nonattainment Areas - Boilers, Process Heaters, Stationary Engines and Gas Turbines (continued)**	
♦	4.	The application area is located in the Dallas/Fort Worth Eight-Hour area (except for Wise County) and has units that qualify for an exemption under 30 TAC § 117.2103.	☐YES ☐NO
♦	5.	The application area has units subject to the emission specifications under 30 TAC §§ 117.2010 or 30 TAC § 117.2110.	☐YES ☐NO
	6.	The application area has a unit that has been approved for alternative case specific specifications (ACSS) in 30 TAC § 117.2025 or 30 TAC § 117.2125. *If the response to Question IV.F.6 is "NO," go to Section IV.G.*	☐YES ☐NO
	7.	An ACSS for carbon monoxide (CO) has been approved?	☐YES ☐NO
	8.	An ACSS for ammonia (NH_3) has been approved?	☐YES ☐NO
	9.	Provide the Permit Number(s) and authorization/issuance date(s) of the NSR project(s) that incorporates an ACSS below.	
	G.	**Utility Electric Generation in East and Central Texas**	
	1.	The application area includes utility electric power boilers and/or stationary gas turbines (including duct burners used in turbine exhaust ducts) that were placed into service before December 31, 1995. *If the response to Question IV.G.1 is "NO," go to Question IV.H.1.*	☐YES ☐NO
	2.	The application area is complying with the System Cap in 30 TAC § 117.3020.	☐YES ☐NO
	H.	**Multi-Region Combustion Control - Water Heaters, Small Boilers, and Process Heaters**	
	1.	The application area includes a manufacturer, distributor, retailer or installer of natural gas fired water heaters, boilers or process heaters with a maximum rated capacity of 2.0 MMBtu/hr or less. *If the response to question IV.H.1 is "NO," go to Section V.*	☒YES ☐NO
	2.	All water heaters, boilers or process heaters manufactured, distributed, retailed or installed qualify for an exemption under 30 TAC § 117.3203.	☐YES ☒NO

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V.	**Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products**		
	A.	**Subpart B - National Volatile Organic Compound Emission Standards for Automobile Refinish Coatings**	
	1.	The application area manufactures automobile refinish coatings or coating components and sells or distributes these coatings or coating components in the United States.	☐YES ☒NO
	2.	The application area imports automobile refinish coatings or coating components, manufactured on or after January 11, 1999, and sells or distributes these coatings or coating components in the United States. *If the responses to Questions V.A.1 and V.A.2 are both "NO," go to Section V.B.*	☐YES ☒NO
	3.	All automobile refinish coatings or coating components manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.100(c)(1) - (6).	☐YES ☐NO
	B.	**Subpart C - National Volatile Organic Compound Emission Standards for Consumer Products**	
	1.	The application area manufactures consumer products for sale or distribution in the United States.	☐YES ☒NO
	2.	The application area imports consumer products manufactured on or after December 10, 1998 and sells or distributes these consumer products in the United States.	☐YES ☒NO
	3.	The application area is a distributor of consumer products whose name appears on the label of one or more of the products. *If the responses to Questions V.B.1 - V.B.3 are all "NO," go to Section V.C.*	☐YES ☒NO
	4.	All consumer products manufactured, imported, or distributed by the application area meet one or more of the exemptions specified in 40 CFR § 59.201(c)(1) - (7).	☐YES ☐NO

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V.	**Title 40 Code of Federal Regulations Part 59 (40 CFR Part 59) - National Volatile Organic Compound Emission Standards for Consumer and Commercial Products (continued)**		
	C.	**Subpart D - National Volatile Organic Compound Emission Standards for Architectural Coatings**	
	1.	The application area manufactures or imports architectural coatings for sale or distribution in the United States.	☐YES ☒NO
	2.	The application area manufactures or imports architectural coatings that are registered under the Federal Insecticide, Fungicide, and Rodenticide Act. *If the responses to Questions V.C.1-2 are both "NO," go to Section V.D.*	☐YES ☒NO
	3.	All architectural coatings manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR §59.400(c)(1)-(5).	☐YES ☐NO
	D.	**Subpart E - National Volatile Organic Compound Emission Standards for Aerosol Coatings**	
	1.	The application area manufactures or imports aerosol coating products for sale or distribution in the United States.	☐YES ☒NO
	2.	The application area is a distributor of aerosol coatings for resale or distribution in the United States.	☐YES ☒NO
	E.	**Subpart F - Control of Evaporative Emissions From New and In-Use Portable Fuel Containers**	
	1.	The application area manufactures or imports portable fuel containers for sale or distribution in the United States. *If the response to Question V.E.1 is "NO," go to Section VI.*	☐YES ☒NO
	2.	All portable fuel containers manufactured or imported by the application area meet one or more of the exemptions specified in 40 CFR § 59.605(a) - (c).	☐YES ☐NO
VI.	**Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards**		
	A.	**Applicability**	
♦	1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 60 subparts. *If the response to Question VI.A.1 is "NO," go to Section VII.*	☒YES ☐NO

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VI.	**Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)**		
	B.	**Subpart Y - Standards of Performance for Coal Preparation and Processing Plants**	
	1.	The application area is located at a coal preparation and processing plant. *If the response to Question VI.B.1 is "NO," go to Section VI.C.*	☒YES ☐NO
	2.	The coal preparation and processing plant has a design capacity greater than 200 tons per day (tpd). *If the response to Question VI.B.2 is "NO," go to Section VI.C.*	☒YES ☐NO
	3.	The plant has an option to enforceably limit its operating level to less than 200 tpd and is choosing this option. *If the response to Question VI.B.3 is "YES," go to Section VI.C.*	☐YES ☒NO
	4.	The plant contains an open storage pile, as defined in § 60.251, as an affected facility. *If the response to Question VI.B.4 is "NO," go to Section VI.C.*	☒YES ☐NO
	5.	The open storage pile was constructed, reconstructed or modified after May 27, 2009.	☐YES ☒NO
	C.	**Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only)**	
♦	1.	The application area includes one or more stationary gas turbines that have a heat input at peak load greater than or equal to 10 MMBtu/hr (10.7GJ/hr), based on the lower heating value of the fuel fired. *If the response to Question VI.C.1 is "NO" or "N/A," go to Section VI.D.*	☐YES ☐NO ☒N/A
♦	2.	One or more of the affected facilities were constructed, modified, or reconstructed after October 3, 1977 and prior to February 19, 2005. *If the response to Question VI.C.2 is "NO," go to Section VI.D.*	☐YES ☐NO
♦	3.	One or more stationary gas turbines in the application area are using a previously approved alternative fuel monitoring schedule as specified in 40 CFR § 60.334(h)(4).	☐YES ☐NO
♦	4.	The exemption specified in 40 CFR § 60.332(e) is being utilized for one or more stationary gas turbines in the application area.	☐YES ☐NO

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VI.	**Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)**		
	C.	**Subpart GG - Standards of Performance for Stationary Gas Turbines (GOP applicants only) (continued)**	
♦	5.	One or more stationary gas turbines subject to 40 CFR Part 60, Subpart GG in the application area is injected with water or steam for the control of nitrogen oxides.	☐YES ☐NO
	D.	**Subpart XX - Standards of Performance for Bulk Gasoline Terminals**	
	1.	The application area includes bulk gasoline terminal loading racks. *If the response to Question VI.D.1 is "NO," go to Section VI.E.*	☐YES ☒NO ☐N/A
	2.	One or more of the loading racks were constructed or modified after December 17, 1980, and are not subject to 40 CFR Part 63, Subpart CC.	☐YES ☐NO
	E.	**Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO_2) Emissions**	
♦	1.	The application area includes affected facilities identified in 40 CFR § 60.640(a) that process natural gas (onshore). *For SOP applications, if the response to Question VI.E.1 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.1 is "NO" or "N/A," go to Section VI.H.*	☐YES ☒NO
♦	2.	The affected facilities commenced construction or modification after January 20, 1984 and on or before August 23, 2011. *For SOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.2 is "NO," go to Section VI.H.*	☐YES ☐NO
♦	3.	The application area includes a gas sweetening unit with a design capacity greater than or equal to 2 long tons per day (LTPD) of hydrogen sulfide but operates at less than 2 LTPD. *For SOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.3 is "NO," go to Section VI.H.*	☐YES ☐NO

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Form OP-REQ1: Page 20			
VI.	**Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)**		
	E.	**Subpart LLL - Standards of Performance for Onshore Natural Gas Processing: Sulfur Dioxide (SO_2) Emissions (continued)**	
♦	4.	Federally enforceable operating limits have been established in the preconstruction authorization limiting the gas sweetening unit to less than 2 LTPD. *For SOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.F. For GOP applications, if the response to Question VI.E.4. is "NO," go to Section VI.H.*	☐YES ☐NO
♦	5.	Please provide the Unit ID(s) for the gas sweetening unit(s) that have established federally enforceable operating limits in the space provided below.	
	F.	**Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants**	
	1.	The application area includes affected facilities identified in 40 CFR § 60.670(a)(1) that are located at a fixed or portable nonmetallic mineral processing plant. *If the response to Question VI.F.1 is "NO," go to Section VI.G.*	☒YES ☐NO
	2.	Affected facilities identified in 40 CFR § 60.670(a)(1) and located in the application area are subject to 40 CFR Part 60, Subpart OOO.	☒YES ☐NO
	G.	**Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems**	
	1.	The application area is located at a petroleum refinery and includes one or more of the affected facilities identified in 40 CFR § 60.690(a)(2) - (4) for which construction, modification, or reconstruction was commenced after May 4, 1987. *If the response to Question VI.G.1 is "NO," go to Section VI.H.*	☐YES ☒NO
	2.	The application area includes storm water sewer systems.	☐YES ☐NO

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VI.	**Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)**		
	G.	**Subpart QQQ - Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems (continued)**	
	3.	The application area includes ancillary equipment which is physically separate from the wastewater system and does not come in contact with or store oily wastewater.	☐YES ☐NO
	4.	The application area includes non-contact cooling water systems.	☐YES ☐NO
	5.	The application area includes individual drain systems. *If the response to Question VI.G.5 is "NO," go to Section VI.H.*	☐YES ☐NO
	6.	The application area includes one or more individual drain systems that meet the exemption specified in 40 CFR § 60.692-2(d).	☐YES ☐NO
	7.	The application area includes completely closed drain systems.	☐YES ☐NO
	H.	**Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004**	
♦	1.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator. *If the response to Question VI.H.1. is "N/A," go to Section VI.I. If the response to Question VI.H.1 is "NO," go to Question VI.H.4.*	☐YES ☒NO ☐N/A
♦	2.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006.	☐YES ☐NO
♦	3.	The application area includes at least one small municipal waste incineration unit, other than an air curtain incinerator, constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	☐YES ☐NO
♦	4.	The application area includes at least one air curtain incinerator. *If the response to Question VI.H.4 is "NO," go to Section VI.I.*	☐YES ☒NO

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Form OP-REQ1: Page 22			
VI.	**Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)**		
	H.	**Subpart AAAA - Standards of Performance for Small Municipal Waste Incineration Units for Which Construction Commenced After August 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 6, 2004 (continued)**	
♦	5.	The application area includes at least one air curtain incinerator constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006. *If the response to Question VI.H.5 is "NO," go to Question VI.H.7.*	☐YES ☐NO
♦	6.	All air curtain incinerators constructed after August 30, 1999 or modified or reconstructed on or after June 6, 2006 combust only yard waste.	☐YES ☐NO
♦	7.	The application area includes at least one air curtain incinerator constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006.	☐YES ☐NO
♦	8.	All air curtain incinerators constructed before August 30, 1999 and not modified or reconstructed on or after June 6, 2006 combust only yard waste.	☐YES ☐NO
	I.	**Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001**	
♦	1.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator. *If the response to Question VI.I.1 is "N/A," go to Section VI.J. If the response to Question VI.I.1 is "NO," go to Question VI.I.4.*	☐YES ☒NO ☐N/A
♦	2.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001.	☐YES ☐NO

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VI.	**Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)**		
	I.	**Subpart CCCC - Standards of Performance for Commercial and Industrial Solid Waste Incineration Units for Which Construction Commenced After November 30, 1999 or for Which Modification or Reconstruction Commenced on or After June 1, 2001 (continued)**	
♦	3.	The application area includes at least one commercial or industrial solid waste incineration unit, other than an air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	☐YES ☐NO
♦	4.	The application area includes at least one air curtain incinerator. *If the response to Question VI.I.4 is "NO," go to Section VI.J.*	☐YES ☒NO
♦	5.	The application area includes at least one air curtain incinerator, constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001. *If the response to Question VI.I.5 is "NO," go to VI.I.7.*	☐YES ☐NO
♦	6.	All air curtain incinerators constructed after November 30, 1999 or modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	☐YES ☐NO
♦	7.	The application area includes at least one air curtain incinerator, constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001.	☐YES ☐NO
♦	8.	All air curtain incinerators constructed before November 30, 1999 and not modified or reconstructed on or after June 1, 2001 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	☐YES ☐NO

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VI.	**Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (continued)**		
	J.	**Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006**	
♦	1.	The application area includes at least one very small municipal waste incineration unit or institutional incineration unit, other than an air curtain incinerator. *If the response to Question VI.J.1 is "N/A," go to Section VI.K. If the response to Question VI.J.1 is "NO," go to Question VI.J.4.*	☐YES ☒NO ☐N/A
♦	2.	The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006.	☐YES ☐NO
♦	3.	The application area includes at least one very small municipal waste incineration unit, other than an air curtain incinerator, constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	☐YES ☐NO
♦	4.	The application area includes at least one air curtain incinerator. *If the response to Question VI.J.4 is "NO," go to Section VI.K.*	☐YES ☒NO
♦	5.	The application area includes at least one air curtain incinerator constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006. *If the response to Question VI.J.5 is "NO," go to Question VI.J.7.*	☐YES ☐NO
♦	6.	All air curtain incinerators constructed after December 9, 2004 or modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	☐YES ☐NO
♦	7.	The application area includes at least one air curtain incinerator constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006.	☐YES ☐NO

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Form OP-REQ1: Page 25			
VI.	**Title 40 Code of Federal Regulations Part 60 - New Source Performance Standards (NSPS) (continued)**		
	J.	**Subpart EEEE - Standards of Performance for Other Solid Waste Incineration Units for Which Construction Commenced After December 9, 2004 or for Which Modification or Reconstruction Commenced on or After June 16, 2006 (continued)**	
♦	8.	All air curtain incinerators constructed before December 9, 2004 and not modified or reconstructed on or after June 16, 2006 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	☐YES ☐NO
♦	9.	The air curtain incinerator is located at an institutional facility and is a distinct operating unit of the institutional facility that generated the waste.	☐YES ☐NO
♦	10.	The air curtain incinerator burns less than 35 tons per day of wood waste, clean lumber, or yard waste or a mixture of these materials.	☐YES ☐NO
	K.	**Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution**	
♦	1.	The application area includes one or more of the onshore affected facilities listed in 40 CFR § 60.5365(a)-(g) that are subject to 40 CFR Part 60, Subpart OOOO.	☐YES ☒NO
VII.	**Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants**		
	A.	**Applicability**	
♦	1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 61 subparts. *If the response to Question VII.A.1 is "NO" or "N/A," go to Section VIII.*	☐YES ☒NO ☐N/A
	B.	**Subpart F - National Emission Standard for Vinyl Chloride**	
	1.	The application area is located at a plant which produces ethylene dichloride by reaction of oxygen and hydrogen chloride with ethylene, vinyl chloride by any process, and/or one or more polymers containing any fraction of polymerized vinyl chloride.	☐YES ☐NO
	C.	**Subpart J - National Emission Standard for Benzene Emissions for Equipment Leaks (Fugitive Emission Sources) of Benzene (Complete this section for GOP applications only)**	
♦	1.	The application area includes equipment in benzene service.	☐YES ☐NO ☐N/A

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VII.	**Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)**		
	D.	**Subpart L - National Emission Standard for Benzene Emissions from Coke By-Product Recovery Plants**	
	1.	The application area is located at a coke by-product recovery plant and includes one or more of the affected sources identified in 40 CFR § 61.130(a) - (b). *If the response to Question VII.D.1 is "NO," go to Section VII.E.*	☐YES ☐NO
	2.	The application area includes equipment in benzene service as determined by 40 CFR § 61.137(b).	☐YES ☐NO
	3.	The application area has elected to comply with the provisions of 40 CFR § 61.243-1 and 40 CFR § 61.243-2.	☐YES ☐NO
	E.	**Subpart M - National Emission Standard for Asbestos**	
		Applicability	
	1.	The application area includes sources, operations, or activities specified in 40 CFR §§ 61.143, 61.144, 61.146, 61.147, 61.148, or 61.155. *If the response to Question VII.E.1 is "NO," go to Section VII.F.*	☐YES ☐NO
		Roadway Construction	
	2.	The application area includes roadways constructed or maintained with asbestos tailings or asbestos-containing waste material.	☐YES ☐NO
		Manufacturing Commercial Asbestos	
	3.	The application area includes a manufacturing operation using commercial asbestos. *If the response to Question VII.E.3 is "NO," go to Question VII.E.4.*	☐YES ☐NO
		a. Visible emissions are discharged to outside air from the manufacturing operation	☐YES ☐NO
		b. An alternative emission control and waste treatment method is being used that has received prior U.S. Environmental Protection Agency (EPA) approval.	☐YES ☐NO

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Form OP-REQ1: Page 27			
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)			
E. Subpart M - National Emission Standard for Asbestos (continued)			
***Manufacturing Commercial Asbestos* (continued)**			
	c.	Asbestos-containing waste material is processed into non-friable forms.	☐YES ☐NO
	d.	Asbestos-containing waste material is adequately wetted.	☐YES ☐NO
	e.	Alternative filtering equipment is being used that has received EPA approval.	☐YES ☐NO
	f.	A high efficiency particulate air (HEPA) filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles	☐YES ☐NO
	g.	The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	☐YES ☐NO
Asbestos Spray Application			
4.		The application area includes operations in which asbestos-containing materials are spray applied. *If the response to Question VII.E.4 is "NO," go to Question VII.E.5.*	☐YES ☐NO
	a.	Asbestos fibers are encapsulated with a bituminous or resinous binder during spraying and are not friable after drying. *If the response to Question VII.E.4.a is "YES," go to Question VII.E.5.*	☐YES ☐NO
	b.	Spray-on applications on buildings, structures, pipes, and conduits do not use material containing more than 1% asbestos.	☐YES ☐NO
	c.	An alternative emission control and waste treatment method is being used that has received prior EPA approval.	☐YES ☐NO

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VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)			
E. Subpart M - National Emission Standard for Asbestos (continued)			
***Asbestos Spray Application* (continued)**			
	d.	Asbestos-containing waste material is processed into non-friable forms.	☐YES ☐NO
	e.	Asbestos-containing waste material is adequately wetted.	☐YES ☐NO
	f.	Alternative filtering equipment is being used that has received EPA approval.	☐YES ☐NO
	g.	A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	☐YES ☐NO
	h.	The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	☐YES ☐NO
Fabricating Commercial Asbestos			
5.		The application area includes a fabricating operation using commercial asbestos. *If the response to Question VII.E.5 is "NO," go to Question VII.E.6.*	☐YES ☐NO
	a.	Visible emissions are discharged to outside air from the manufacturing operation.	☐YES ☐NO
	b.	An alternative emission control and waste treatment method is being used that has received prior EPA approval.	☐YES ☐NO
	c.	Asbestos-containing waste material is processed into non-friable forms.	☐YES ☐NO
	d.	Asbestos-containing waste material is adequately wetted.	☐YES ☐NO
	e.	Alternative filtering equipment is being used that has received EPA approval.	☐YES ☐NO

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Form OP-REQ1: Page 29		
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)		
E.	**Subpart M - National Emission Standard for Asbestos (continued)**	
	***Fabricating Commercial Asbestos* (continued)**	
	f. A HEPA filter is being used that is certified to be at least 99.97% efficient for 0.3 micron particles.	☐YES ☐NO
	g. The EPA has authorized the use of wet collectors designed to operate with a unit contacting energy of at least 9.95 kilopascals.	☐YES ☐NO
	Non-sprayed Asbestos Insulation	
	6. The application area includes insulating materials (other than spray applied insulating materials) that are either molded and friable or wet-applied and friable after drying.	☐YES ☐NO
	Asbestos Conversion	
	7. The application area includes operations that convert regulated asbestos-containing material and asbestos-containing waste material into nonasbestos (asbestos-free) material.	☐YES ☐NO
F.	**Subpart P - National Emission Standard for Inorganic Arsenic Emissions from Arsenic Trioxide and Metallic Arsenic Production Facilities**	
	1. The application area is located at a metallic arsenic production plant or at an arsenic trioxide plant that processes low-grade arsenic bearing materials by a roasting condensation process.	☐YES ☐NO
G.	**Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations**	
	1. The application area is located at a benzene production facility and/or bulk terminal. *If the response to Question VII.G.1 is "NO," go to Section VII.H.*	☐YES ☐NO
	2. The application area includes benzene transfer operations at marine vessel loading racks.	☐YES ☐NO

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VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)		
G. Subpart BB - National Emission Standard for Benzene Emissions from Benzene Transfer Operations (continued)		
3.	The application area includes benzene transfer operations at railcar loading racks.	☐YES ☐NO
4.	The application area includes benzene transfer operations at tank-truck loading racks.	☐YES ☐NO
H. Subpart FF - National Emission Standard for Benzene Waste Operations		
Applicability		
1.	The application area includes a chemical manufacturing plant, coke by-product recovery plant, or petroleum refinery facility as defined in § 61.341.	☐YES ☐NO
2.	The application area is located at a hazardous waste treatment, storage, and disposal (TSD) facility site as described in 40 CFR § 61.340(b). *If the responses to Questions VII.H.1 and VII.H.2 are both "NO," go to Section VIII.*	☐YES ☐NO
3.	The application area is located at a site that has no benzene onsite in wastes, products, byproducts, or intermediates. *If the response to Question VII.H.3 is "YES," go to Section VIII.*	☐YES ☐NO
4.	The application area is located at a site having a total annual benzene quantity from facility waste less than 1 megagram per year (Mg/yr). *If the response to Question VII.H.4 is "YES," go to Section VIII*	☐YES ☐NO
5.	The application area is located at a site having a total annual benzene quantity from facility waste greater than or equal to 1 Mg/yr but less than 10 Mg/yr. *If the response to Question VII.H.5 is "YES," go to Section VIII.*	☐YES ☐NO

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Form OP-REQ1: Page 31			
VII.	**Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)**		
	H.	**Subpart FF - National Emission Standard for Benzene Waste Operations (continued)**	
		***Applicability* (continued)**	
	6.	The flow-weighted annual average benzene concentration of each waste stream at the site is based on documentation.	☐YES ☐NO
	7.	The application area has waste streams with flow-weighted annual average water content of 10% or greater.	☐YES ☐NO
		Waste Stream Exemptions	
	8.	The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(2) (the flow-weighted annual average benzene concentration is less than 10 ppmw).	☐YES ☐NO
	9.	The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because process wastewater has a flow rate less than 0.02 liters per minute or an annual wastewater quantity less than 10 Mg/yr.	☐YES ☐NO
	10.	The application area has waste streams that meet the exemption specified in 40 CFR § 61.342(c)(3) because the total annual benzene quantity is less than or equal to 2 Mg/yr.	☐YES ☐NO
	11.	The application area transfers waste off-site for treatment by another facility.	☐YES ☐NO
	12.	The application area is complying with 40 CFR § 61.342(d).	☐YES ☐NO
	13.	The application area is complying with 40 CFR § 61.342(e). *If the response to Question VII.H.13 is "NO," go to Question VII.H.15.*	☐YES ☐NO
	14.	The application area has facility waste with a flow weighted annual average water content of less than 10%.	☐YES ☐NO

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Form OP-REQ1: Page 32		
VII. Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)		
H. Subpart FF - National Emission Standard for Benzene Waste Operations (continued)		
Container Requirements		
15.	The application area has containers, as defined in 40 CFR § 61.341, that receive non-exempt benzene waste. *If the response to Question VII.H.15 is "NO," go to Question VII.H.18.*	☐YES ☐NO
16.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. *If the response to Question VII.H.16 is "YES," go to Question VII.H.18.*	☐YES ☐NO
17.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	☐YES ☐NO
Individual Drain Systems		
18.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage non-exempt benzene waste. *If the response to Question VII.H.18 is "NO," go to Question VII.H.25.*	☐YES ☐NO
19.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. *If the response to Question VII.H.19 is "YES," go to Question VII.H.25.*	☐YES ☐NO
20.	The application area has individual drain systems complying with 40 CFR § 61.346(a). *If the response to Question VII.H.20 is "NO," go to Question VII.H.22.*	☐YES ☐NO
21.	Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	☐YES ☐NO

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Form OP-REQ1: Page 33			
VII.	**Title 40 Code of Federal Regulations Part 61 - National Emission Standards for Hazardous Air Pollutants (continued)**		
	H.	**Subpart FF - National Emission Standard for Benzene Waste Operations (continued)**	
		***Individual Drain Systems* (continued)**	
	22.	The application area has individual drain systems complying with 40 CFR § 61.346(b). *If the response to Question VII.H.22 is "NO," go to Question VII.H.25.*	☐YES ☐NO
	23.	Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	☐YES ☐NO
	24.	Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	☐YES ☐NO
		Remediation Activities	
	25.	Remediation activities take place at the application area subject to 40 CFR Part 61, Subpart FF.	☐YES ☐NO
VIII.	**Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories**		
	A.	**Applicability**	
♦	1.	The application area includes a unit(s) that is subject to one or more 40 CFR Part 63 subparts other than subparts made applicable by reference under subparts in 40 CFR Part 60, 61 or 63. *See instructions for 40 CFR Part 63 subparts made applicable only by reference.*	☒YES ☐NO
	B.	**Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry**	
	1.	The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). *If the response to Question VIII.B.1 is "NO," go to Section VIII.D.*	☒YES ☐NO

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Form OP-REQ1: Page 34		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
B. Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry (continued)		
2.	The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii). *If the response to Question VIII.B.2 is "NO," go to Section VIII.D.*	☐YES ☒NO
3.	The application area is located at a site that includes at least one chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	☐YES ☐NO
4.	The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and uses as a reactant or manufactures as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F.	☐YES ☐NO
5.	The application area includes a chemical manufacturing process unit, as defined in 40 CFR § 63.101, that manufactures as a primary product one or more of the chemicals listed in 40 CFR § 63.100(b)(1)(i) or (b)(1)(ii) and does not use as a reactant or manufacture as a product, or co-product, one or more of the organic hazardous air pollutants listed in table 2 of 40 CFR Part 63, Subpart F. *If the response to Questions VIII.B.3, B.4 and B.5 are all "NO," go to Section VIII.D.*	☐YES ☐NO

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Form OP-REQ1: Page 35			
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)			
C.	**Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater**		
	Applicability		
	1.	The application area is located at a site that is subject to 40 CFR 63, Subpart F and the application area includes process vents, storage vessels, transfer racks, or waste streams associated with a chemical manufacturing process subject to 40 CFR 63, Subpart F. *If the response to Question VIII.C.1 is "NO," go to Section VIII.D.*	☐YES ☐NO
	2.	The application area includes fixed roofs, covers, and/or enclosures that are required to comply with 40 CFR § 63.148.	☐YES ☐NO
	3.	The application area includes vapor collection systems or closed-vent systems that are required to comply with 40 CFR § 63.148. *If the response to Question VIII.C.3 is "NO," go to Question VIII.C.8.*	☐YES ☐NO
	4.	The application area includes vapor collection systems or closed-vent systems that are constructed of hard-piping.	☐YES ☐NO
	5.	The application area includes vapor collection systems or closed-vent systems that contain bypass lines that could divert a vent stream away from a control device and to the atmosphere. *If the response to Question VIII.C.5 is "NO," go to Question VIII.C.8.*	☐YES ☐NO
	Vapor Collection and Closed Vent Systems		
	6.	Flow indicators are installed, calibrated, maintained, and operated at the entrances to bypass lines in the application area.	☐YES ☐NO
	7.	Bypass lines in the application area are secured in the closed position with a car-seal or a lock-and-key type configuration.	☐YES ☐NO

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Form OP-REQ1: Page 36		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)		
	Reloading or Cleaning of Railcars, Tank Trucks, or Barges	
8.	The application area includes reloading and/or cleaning of railcars, tank trucks, or barges that deliver HAPs to a storage tank. *If the response to Question VIII.C.8 is "NO," go to Question VIII.C.11.*	☐YES ☐NO
9.	The application area includes operations that are complying with § 63.119(g)(6) through the use of a closed-vent system with a control device used to reduce inlet emissions of HAPs by at least 95 percent by weight or greater.	☐YES ☐NO
10.	The application area includes operations that are complying with § 63.119(g)(6) through the use of a vapor balancing system.	☐YES ☐NO
	Transfer Racks	
11.	The application area includes Group 1 transfer racks that load organic HAPs.	☐YES ☐NO
	Process Wastewater Streams	
12.	The application area includes process wastewater streams. *If the response to Question VIII.C.12 is "NO," go to Question VIII.C.34.*	☐YES ☐NO
13.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart FF. *If the response to Question VIII.C.13 is "NO," go to Question VIII.C.15.*	☐YES ☐NO
14.	The application area includes process wastewater streams that are complying with 40 CFR §§ 63.110(e)(1)(i) and (e)(1)(ii).	☐YES ☐NO
15.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Part 61, Subpart F. *If the response to Question VIII.C.15 is "NO," go to Question VIII.C.17.*	☐YES ☐NO

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Form OP-REQ1: Page 37		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)		
***Process Wastewater Streams* (continued)**		
16.	The application area includes process wastewater streams utilizing the compliance option specified in 40 CFR § 63.110(f)(4)(ii).	☐YES ☐NO
17.	The application area includes process wastewater streams that are also subject to the provisions of 40 CFR Parts 260 through 272. *If the response to Question VIII.C.17 is "NO," go to Question VIII.C.20.*	☐YES ☐NO
18.	The application area includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(i).	☐YES ☐NO
19.	The application are includes process wastewater streams complying with 40 CFR § 63.110(e)(2)(ii).	☐YES ☐NO
20.	The application area includes process wastewater streams, located at existing sources, that are designated as Group 1; are required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 9 compounds.	☐YES ☐NO
21.	The application area includes process wastewater streams, located at existing sources that are Group 2.	☐YES ☐NO
22.	The application area includes process wastewater streams, located at new sources, that are designated as Group 1; required to be treated as Group 1 under 40 CFR § 63.110; or are determined to be Group 1 for Table 8 or Table 9 compounds.	☐YES ☐NO
23.	The application area includes process wastewater streams, located at new sources that are Group 2 for both Table 8 and Table 9 compounds.	☐YES ☐NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)		
***Process Wastewater Streams* (continued)**		
24.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. *If the response to Question VIII.C.24 is "YES," go to Question VIII.C.34.*	☐YES ☐NO
25.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. *If the response to Question VIII.C.25 is "NO," go to Question VIII.C.27.*	☐YES ☐NO
26.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	☐YES ☐NO
27.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	☐YES ☐NO
28.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. *If the responses to Questions VIII.C.27 - VIII.C.28 are both "NO," go to Question VIII.C.30.*	☐YES ☐NO
29.	The application area includes waste management units that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	☐YES ☐NO
30.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	☐YES ☐NO

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Form OP-REQ1: Page 39		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
C. Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater (continued)		
	Drains	
31.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. *If the response to Question VIII.C.31 is "NO," go to Question VIII.C.34.*	☐YES ☐NO
32.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	☐YES ☐NO
33.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐YES ☐NO
34.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b). *If the response to Question VIII.C.34 is "NO," go to Question VIII.C.39.*	☐YES ☐NO
35.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). *If the response to Question VIII.C.35 is "NO," go to Question VIII.C.39.*	☐YES ☐NO
36.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at any flow rate.	☐YES ☐NO

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Form OP-REQ1: Page 40		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
C.	**Subpart G-National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operation, and Wastewater (continued)**	
	***Drains* (continued)**	
37.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 9, at an annual average flow rate greater than or equal to 10 liters per minute.	☐YES ☐NO
38.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.100(l)(1) or (l)(2); and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds listed in 40 CFR Part 63 Subpart G, Table 8, at an average annual flow rate greater than or equal to 0.02 liter per minute.	☐YES ☐NO
	Gas Streams	
39.	The application area includes gas streams meeting the characteristics of 40 CFR § 63.107(b) - (h) or the criteria of 40 CFR § 63.113(i) and are transferred to a control device not owned or operated by the applicant.	☐YES ☐NO
40.	The applicant is unable to comply with 40 CFR §§ 63.113 - 63.118 for one or more reasons described in 40 CFR § 63.100(q)(1), (3), or (5).	☐YES ☐NO
D.	**Subpart N - National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks**	
1.	The application area includes chromium electroplating or chromium anodizing tanks located at hard chromium electroplating, decorative chromium electroplating, and/or chromium anodizing operations.	☐YES ☒NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
E.	**Subpart O - Ethylene Oxide Emissions Standards for Sterilization Facilities**	
1.	The application area includes sterilization facilities where ethylene oxide is used in the sterilization or fumigation of materials. *If the response to Question VIII.E.1 is "NO," go to Section VIII.F.*	☐YES ☒NO
2.	Sterilization facilities located in the application area are subject to 40 CFR Part 63, Subpart O. *If the response to Question VIII.E.2 is "NO," go to Section VIII.F.*	☐YES ☐NO
3.	The sterilization source has used less than 1 ton (907 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	☐YES ☐NO
4.	The sterilization source has used less than 10 tons (9070 kg) of ethylene oxide within all consecutive 12-month periods after December 6, 1996.	☐YES ☐NO
F.	**Subpart Q - National Emission Standards for Industrial Process Cooling Towers**	
1.	The application area includes industrial process cooling towers. *If the response to Question VIII.F.1 is "NO," go to Section VIII.G.*	☐YES ☒NO
2.	Chromium-based water treatment chemicals have been used on or after September 8, 1994.	☐YES ☐NO
G.	**Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)**	
1.	The application area includes a bulk gasoline terminal.	☐YES ☒NO
2.	The application area includes a pipeline breakout station. *If the responses to Questions VIII.G.1 and VIII.G.2 are both "NO," go to Section VIII.H.*	☐YES ☒NO
3.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with another bulk gasoline terminal or a pipeline breakout station. *If the response to Question VIII.G.3 is "YES," go to Question VIII.G.10.*	☐YES ☐NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
G. Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations) (continued)		
4.	The bulk gasoline terminal or pipeline breakout station is located within a contiguous area and under common control with sources, other than bulk gasoline terminals or pipeline breakout stations that emit or have the potential to emit HAPs. *If the response to Question VIII.G.4 is "YES," go to Question VIII.G.10.*	☐YES ☐NO
5.	An emissions screening factor was calculated for the bulk gasoline terminal or pipeline breakout station. *If the response to Question VIII.G.5 is "NO," go to Question VIII.G.10.*	☐YES ☐NO
6.	The value 0.04(OE) is less than 5% of the value of the bulk gasoline terminal emissions screening factor (ET) or the pipeline breakout station emissions screening factor (Ep). *If the response to Question VIII.G.6 is "NO," go to Question VIII.G.10.*	☐YES ☐NO
7.	Emissions screening factor less than 0.5 (ET or EP < 0.5). *If the response to Question VIII.G.7 is "YES," go to Section VIII.H.*	☐YES ☐NO
8.	Emissions screening factor greater than or equal to 0.5, but less than 1.0 (0.5 ≤ ET or EP < 1.0). *If the response to Question VIII.G.8 is "YES," go to Section VIII.H.*	☐YES ☐NO
9.	Emissions screening factor greater than or equal to 1.0 (ET or EP ≥ 1.0). *If the response to Question VIII.G.9 is "YES," go to Question VIII.G.11.*	☐YES ☐NO
10.	The site at which the application area is located is a major source of HAP. *If the response to Question VIII.G.10 is "NO," go to Section VIII.H.*	☐YES ☐NO
11.	The application area is using an alternative leak monitoring program as described in 40 CFR § 63.424(f).	☐YES ☐NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)

H. Subpart S - National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry

1.	The application area includes processes that produce pulp, paper, or paperboard and are located at a plant site that is a major source of HAPs as defined in 40 CFR § 63.2. *If the response to Question VIII.H.1 is "NO," go to Section VIII.I.*	☐YES ☒NO
2.	The application area uses processes and materials specified in 40 CFR § 63.440(a)(1) - (3). *If the response to Question VIII.H.2 is "NO," go to Section VIII.I.*	☐YES ☐NO
3.	The application area includes one or more sources subject to 40 CFR Part 63, Subpart S that are existing sources. *If the response to Question VIII.H.3 is "NO," go to Section VIII.I.*	☐YES ☐NO
4.	The application area includes one or more kraft pulping systems that are existing sources.	☐YES ☐NO
5.	The application area includes one or more dissolving-grade bleaching systems that are existing sources at a kraft or sulfite pulping mill.	☐YES ☐NO
6.	The application area includes bleaching systems that are existing sources and are complying with the Voluntary Advanced Technology Incentives Program for Effluent Limitation Guidelines in 40 CFR § 430.24. *If the response to Question VIII.H.6 is "NO," go to Section VIII.I.*	☐YES ☐NO
7.	The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(i).	☐YES ☐NO
8.	The application area includes bleaching systems that are complying with 40 CFR § 63.440(d)(3)(ii).	☐YES ☐NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
I.	**Subpart T - National Emission Standards for Halogenated Solvent Cleaning**	
1.	The application area includes an individual batch vapor, in-line vapor, in-line cold, and/or batch cold solvent cleaning machine that uses a hazardous air pollutant (HAP) solvent, or any combination of halogenated HAP solvents, in a total concentration greater than 5% by weight, as a cleaning and/or drying agent.	☐YES ☒NO
2.	The application area is located at a major source and includes solvent cleaning machines, qualifying as affected facilities, that use perchloroethylene, trichloroethylene or methylene chloride.	☐YES ☒NO
3.	The application area is located at an area source and includes solvent cleaning machines, other than cold batch cleaning machines, that use perchloroethylene, trichloroethylene or methylene chloride.	☐YES ☒NO
J.	**Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins**	
1.	The application area includes elastomer product process units and/or wastewater streams and wastewater operations that are associated with elastomer product process units. *If the response to Question VIII.J.1 is "NO," go to Section VIII.K.*	☐YES ☒NO
2.	Elastomer product process units and/or wastewater streams and wastewater operations located in the application area are subject to 40 CFR Part 63, Subpart U. *If the response to Question VIII.J.2 is "NO," go to Section VIII.K.*	☐YES ☐NO
3.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.482.	☐YES ☐NO
4.	The application area includes process wastewater streams that are Group 2 for organic HAPs as defined in 40 CFR § 63.482.	☐YES ☐NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
J. Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)		
5.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. *If the response to Question VIII.J.5 is "YES," go to Question VIII.J.15.*	☐YES ☐NO
6.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. *If the response to Question VIII.J.6 is "NO," go to Question VIII.J.8.*	☐YES ☐NO
7.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	☐YES ☐NO
8.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	☐YES ☐NO
9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. *If the responses to Questions VIII.J.8 - VIII.J.9 are both "NO," go to Question VIII.J.11.*	☐YES ☐NO
10.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	☐YES ☐NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
J.	**Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)**	
	Containers	
11.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	☐YES ☐NO
	Drains	
12.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. *If the response to Question VIII.J.12 is "NO," go to Question VIII.J.15.*	☐YES ☐NO
13.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	☐YES ☐NO
14.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐YES ☐NO
15.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an elastomer product process unit. *If the response to Question VIII.J.15 is "NO," go to Section VIII.K.*	☐YES ☐NO
16.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.501(a)(12). *If the response to Question VIII.J.16 is "NO," go to Section VIII.K.*	☐YES ☐NO

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Form OP-REQ1: Page 47		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
J.	**Subpart U - National Emission Standards for Hazardous Air Pollutant Emissions: Group 1 Polymers and Resins (continued)**	
	***Drains* (continued)**	
17.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at any flow rate.	☐YES ☐NO
18.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an annual average flow rate greater than or equal to 10 liters per minute.	☐YES ☐NO
19.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an elastomer product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.482, at an average annual flow rate greater than or equal to 0.02 liter per minute.	☐YES ☐NO
K.	**Subpart W - National Emission Standards for Hazardous Air Pollutants for Epoxy Resins Production and Non-nylon Polyamides Production**	
1.	The manufacture of basic liquid epoxy resins (BLR) and/or manufacture of wet strength resins (WSR) is conducted in the application area. *If the response to Question VIII.K.1 is "NO" or "N/A," go to Section VIII.L.*	☐YES ☒NO ☐N/A
2.	The application area includes a BLR and/or WSR research and development facility.	☐YES ☐NO

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Form OP-REQ1: Page 48			
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)			
L.	**Subpart X - National Emission Standards for Hazardous Air Pollutants from Secondary Lead Smelting**		
	1.	The application area includes one or more of the affected sources in 40 CFR § 63.541(a) that are located at a secondary lead smelter. *If the response to Question VIII.L.1 is "NO" or "N/A," go to Section VIII.M.*	☐YES ☒NO ☐N/A
	2.	The application area is using and approved alternate to the requirements of § 63.545(c)(1)-(5) for control of fugitive dust emission sources.	☐YES ☐NO
M.	**Subpart Y - National Emission Standards for Marine Tank Vessel Loading Operations**		
	1.	The application area includes marine tank vessel loading operations that are specified in 40 CFR § 63.560 and located at an affected source as defined in 40 CFR § 63.561.	☐YES ☒NO
N.	**Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries**		
	Applicability		
	1.	The application area includes petroleum refining process units and/or related emission points that are specified in 40 CFR § 63.640(c)(1) - (c)(7). *If the response to Question VIII.N.1 is "NO," go to Section VIII.O.*	☐YES ☒NO
	2.	All petroleum refining process units/and or related emission points within the application area are specified in 40 CFR § 63.640(g)(1) - (g)(7). *If the response to Question VIII.N.2 is "YES," go to Section VIII.O.*	☐YES ☐NO

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Form OP-REQ1: Page 49		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
N. Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)		
Applicability **(continued)**		
3.	The application area is located at a plant site that is a major source as defined in the Federal Clean Air Act § 112(a). *If the response to Question VIII.N.3 is "NO," go to Section VIII.O.*	☐YES ☐NO
4.	The application area is located at a plant site which emits or has equipment containing/contacting one or more of the HAPs listed in table 1 of 40 CFR Part 63, Subpart CC. *If the response to Question VIII.N.4 is "NO," go to Section VIII.O.*	☐YES ☐NO
5.	The application area includes Group 1 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	☐YES ☐NO
6.	The application area includes Group 2 wastewater streams that are not conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section.	☐YES ☐NO
7.	The application area includes Group 1 or Group 2 wastewater streams that are conveyed, stored, or treated in a wastewater stream management unit that also receives streams subject to the provisions of 40 CFR §§ 63.133 - 63.147 of Subpart G wastewater provisions section. *If the response to Question VIII.N.7 is "NO," go to Section VIII.O.*	☐YES ☐NO
8.	The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(i).	☐YES ☐NO

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Form OP-REQ1: Page 50		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
N.	**Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries (continued)**	
	***Applicability* (continued)**	
9.	The application area includes Group 1 or Group 2 wastewater streams that are complying with 40 CFR § 63.640(o)(2)(ii). *If the response to Question VIII.N.9 is "NO," go to Section VIII.O.*	☐YES ☐NO
10.	The application area includes Group 2 wastewater streams or organic streams whose benzene emissions are subject to control through the use of one or more treatment processes or waste management units under the provisions of 40 CFR Part 61, Subpart FF on or after December 31, 1992.	☐YES ☐NO
	Containers, Drains, and other Appurtenances	
11.	The application area includes containers that are subject to the requirements of 40 CFR § 63.135 as a result of complying with 40 CFR § 63.640(o)(2)(ii).	☐YES ☐NO
12.	The application area includes individual drain systems that are subject to the requirements of 40 CFR § 63.136 as a result of complying with 40 CFR § 63.640(o)(2)(ii).	☐YES ☐NO
O.	**Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations**	
1.	The application area receives material that meets the criteria for off-site material as specified in 40 CFR § 63.680(b)(1). *If the response to Question VIII.O.1 is "NO" or "N/A," go to Section VIII.P*	☐YES ☒NO ☐N/A
2.	Materials specified in 40 CFR § 63.680(b)(2) are received at the application area.	☐YES ☐NO
3.	The application area has a waste management operation receiving off-site material and is regulated under 40 CFR Part 264 or Part 265.	☐YES ☐NO

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Form OP-REQ1: Page 51		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations (continued)		
4.	The application area has a waste management operation treating wastewater which is an off-site material and is exempted under 40 CFR §§ 264.1(g)(6) or 265.1(c)(10).	☐YES ☐NO
5.	The application area has an operation subject to Clean Water Act, § 402 or § 307(b) but is not owned by a "state" or "municipality."	☐YES ☐NO
6.	The predominant activity in the application area is the treatment of wastewater received from off-site.	☐YES ☐NO
7.	The application area has a recovery operation that recycles or reprocesses hazardous waste which is an off-site material and is exempted under 40 CFR §§ 264.1(g)(2) or 265.1(c)(6).	☐YES ☐NO
8.	The application area has a recovery operation that recycles or reprocesses used solvent which is an off-site material and is not part of a chemical, petroleum, or other manufacturing process that is required to use air emission controls by another subpart of 40 CFR Part 63 or Part 61.	☐YES ☐NO
9.	The application area has a recovery operation that re-refines or reprocesses used oil which is an off-site material and is regulated under 40 CFR Part 279, Subpart F (Standards for Used Oil Processors and Refiners).	☐YES ☐NO
10.	The application area is located at a site where the total annual quantity of HAPs in the off-site material is less than 1 megagram per year. *If the response to Question VIII.O.10 is "YES," go to Section VIII.P.*	☐YES ☐NO

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Form OP-REQ1: Page 52		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
O. Subpart DD - National Emission Standards for Off-site Waste and Recovery Operations (continued)		
11.	The application area receives offsite materials with average VOHAP concentration less than 500 ppmw at the point of delivery that are not combined with materials having a VOHAP concentration of 500 ppmw or greater. *If the response to Question VIII.O.11 is "NO," go to Question VIII.O.14.*	☐YES ☐NO
12.	VOHAP concentration is determined by direct measurement.	☐YES ☐NO
13.	VOHAP concentration is based on knowledge of the off-site material.	☐YES ☐NO
14.	The application area includes an equipment component that is a pump, compressor, and agitator, pressure relief device, sampling connection system, open-ended valve or line, valve, connector or instrumentation system. *If the response to Question VIII.O.14 is "NO," go to Question VIII.O.17.*	☐YES ☐NO
15.	An equipment component in the application area contains or contacts off-site material with a HAP concentration greater than or equal to 10% by weight.	☐YES ☐NO
16.	An equipment component in the application area is intended to operate 300 hours or more during a 12-month period.	☐YES ☐NO
17.	The application area includes containers that manage non-exempt off-site material.	☐YES ☐NO
18.	The application area includes individual drain systems that manage non-exempt off-site materials.	☐YES ☐NO

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Form OP-REQ1: Page 53			
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)			
	P.	**Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities**	
	1.	The application area includes facilities that manufacture or rework commercial, civil, or military aerospace vehicles or components. *If the response to Question VIII.P.1 is "NO" or "N/A," go to Section VIII.Q.*	☐YES ☒NO ☐N/A
	2.	The application area includes one or more of the affected sources specified in 40 CFR § 63.741(c)(1) - (7).	☐YES ☐NO
	Q.	**Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities.**	
♦	1.	The application area contains facilities that process, upgrade or store hydrocarbon liquids that are located at oil and natural gas production facilities prior to the point of custody transfer.	☐YES ☒NO
♦	2.	The application area contains facilities that process, upgrade or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. *For SOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "NO," go to Section VIII.R.* *For GOP applications, if the responses to Questions VIII.Q.1 and VIII.Q.2 are both "NO," go to Section VIII.Z.*	☐YES ☒NO
♦	3.	The application area contains only facilities that exclusively process, store or transfer black oil as defined in § 63.761. *For SOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.R.* *For GOP applications, if the response to Question VIII.Q.3 is "YES," go to Section VIII.Z.*	☐YES ☐NO
♦	4.	The application area is located at a site that is a major source of HAP. *If the response to Question VIII.Q.4 is "NO," go to Question VIII.Q.6.*	☐YES ☐NO

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Form OP-REQ1: Page 54			
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)			
	Q.	**Subpart - HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (continued)**	
♦	5.	The application area contains only a facility, prior to the point of custody transfer, with facility-wide actual annual average natural gas throughput less than 18.4 thousand standard cubic meters (649,789.9 ft^3) per day and a facility-wide actual annual average hydrocarbon liquid throughput less than 39,700 liters (10,487.6 gallons) per day. *For SOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.R.* *For GOP applications, if the response to Question VIII.Q.5 is "YES," go to Section VIII.Z.* *For all applications, if the response to Question VIII.Q.5 is "NO," go to Question VIII.Q.9.*	☐YES ☐NO
♦	6.	The application area includes a triethylene glycol (TEG) dehydration unit. *For SOP applications, f the answer to Question VIII.Q.6 is "NO," go to Section VIII.R. For GOP applications, if the response to Question VIII.Q.6 is "NO," go to Section VIII.Z.*	☐YES ☐NO
♦	7.	The application area is located at a site that is within the boundaries of UA plus offset or a UC, as defined in 40 CFR § 63.761.	☐YES ☐NO
♦	8.	The site has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAP.	☐YES ☐NO
♦	9.	Emissions for major source determination are being estimated based on the maximum natural gas or hydrocarbon liquid throughput as calculated in § 63.760(a)(1)(i)-(iii).	☐YES ☐NO

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Form OP-REQ1: Page 55			
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)			
R.	**Subpart II - National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)**		
	1.	The application area includes shipbuilding or ship repair operations. *If the response to Question VIII.R.1 is "NO," go to Section VIII.S.*	☐YES ☒NO
	2.	Shipbuilding or ship repair operations located in the application area are subject to 40 CFR Part 63, Subpart II.	☐YES ☐NO
S.	**Subpart JJ - National Emission Standards for Wood Furniture Manufacturing Operations**		
	1.	The application area includes wood furniture manufacturing operations and/or wood furniture component manufacturing operations. *If the response to Question VIII.S.1 is "NO" or "N/A," go to Section VIII.T.*	☐YES ☒NO ☐N/A
	2.	The application area meets the definition of an "incidental wood manufacturer" as defined in 40 CFR § 63.801.	☐YES ☐NO
T.	**Subpart KK - National Emission Standards for the Printing and Publishing Industry**		
	1.	The application area includes publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses.	☐YES ☒NO ☐N/A
U.	**Subpart PP - National Emission Standards for Containers**		
	1.	The application area includes containers for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart PP for the control of air emissions. *If the response to Question VIII.U.1 is "NO," go to Section VIII.V.*	☐YES ☒NO
	2.	The application area includes containers using Container Level 1 controls.	☐YES ☐NO
	3.	The application area includes containers using Container Level 2 controls.	☐YES ☐NO

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Form OP-REQ1: Page 56			
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)			
U.	**Subpart PP - National Emission Standards for Containers (continued)**		
4.	The application area includes containers using Container Level 3 controls.	☐YES	☐NO
V.	**Subpart RR - National Emission Standards for Individual Drain Systems**		
1.	The application area includes individual drain systems for which another 40 CFR Part 60, 61, or 63 subpart references the use of 40 CFR Part 63, Subpart RR for the control of air emissions.	☐YES	☒NO
W.	**Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards**		
1.	The application area includes an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process.	☐YES	☒NO
2.	The application area includes process wastewater streams generated from an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process. *If the responses to Questions VIII.W.1 and VIII.W.2 are both "NO," go to Question VIII.W.20.*	☐YES	☒NO
3.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 under the requirements of 40 CFR § 63.132(c).	☐YES	☐NO
4.	The application area includes process wastewater streams that are determined to be Group 2 under the requirements of 40 CFR § 63.132(c).	☐YES	☐NO
5.	All Group 1 wastewater streams at the site are determined to have a total source mass flow rate of less than 1 MG/yr.	☐YES	☐NO
6.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. *If the response to Question VIII.W.6 is "NO," go to Question VIII.W.8.*	☐YES	☐NO

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Form OP-REQ1: Page 57		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)		
7.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	☐YES ☐NO
8.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	☐YES ☐NO
9.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. *If the responses to Questions VIII.W.8 and W.9 are both "NO," go to Question VIII.W.11.*	☐YES ☐NO
10.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	☐YES ☐NO
11.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	☐YES ☐NO
12.	The application area includes individual drain systems that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. *If the response to Question VIII.W.12 is "NO," go to Question VIII.W.15.*	☐YES ☐NO
13.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of covers and, if vented, closed vent systems and control devices.	☐YES ☐NO
14.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐YES ☐NO

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Form OP-REQ1: Page 58		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)		
15.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an acetal resins production process unit; an acrylic and modacrylic fiber production process unit complying with 40 CFR § 63.1103(b)(3)(i); or an existing polycarbonate production process unit. *If the response to Question VIII.W.15 is "NO," go to Question VIII.W.20.*	☐YES ☐NO
16.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.1106(c)(1) - (3). *If the response to Question VIII.W.16 is "NO," go to Question VIII.W.20.*	☐YES ☐NO
17.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at any flow rate.	☐YES ☐NO
18.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an annual average flow rate greater than or equal to 10 liters per minute.	☐YES ☐NO

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Form OP-REQ1: Page 59		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)		
19.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an acrylic resins or acrylic and modacrylic fiber production process unit that is part of a new affected source or is a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 ppmw of compounds meeting the definition of organic HAP in Table 9 to 40 CFR Part 60, Subpart G, at an average annual flow rate greater than or equal to 0.02 liter per minute.	☐YES ☐NO
20.	The application area includes an ethylene production process unit.	☐YES ☒NO ☐N/A
21.	The application area includes waste streams generated from an ethylene production process unit. *If the responses to Questions VIII.W.20 and VIII.W.21 are both "NO" or "N/A," go to Question VIII.W.54.*	☐YES ☒NO ☐N/A
22.	The waste stream(s) contains at least one of the chemicals listed in 40 CFR § 63.1103(e), Table 7(g)(1). *If the response to Question VIII.W.22 is "NO," go to Question VIII.W.54.*	☐YES ☐NO
23.	Waste stream(s) are transferred off-site for treatment. *If the response to Question VIII.W.23 is "NO," go to Question VIII.W.25.*	☐YES ☐NO
24.	The application area has waste management units that treat or manage waste stream(s) prior to transfer off-site for treatment. *If the response to Question VIII.W.24 is "NO," go to Question VIII.W.54.*	☐YES ☐NO

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Form OP-REQ1: Page 60		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W.	**Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)**	
25.	The total annual benzene quantity from waste at the site is less than 10 Mg/yr as determined according to 40 CFR § 61.342(a).	☐YES ☐NO
26.	The application area contains at least one waste stream that is a continuous butadiene waste stream as defined in 40 CFR § 63.1082(b). *If the response to Question VIII.W.26 is "NO," go to Question VIII.W.43.*	☐YES ☐NO
27.	The waste stream(s) contains at least 10 ppmw 1, 3-butadiene at a flow rate of 0.02 liters per minute or is designated for control. *If the response to Question VIII.W.27 is "NO," go to Question VIII.W.43.*	☐YES ☐NO
28.	The control requirements of 40 CFR Part 63, Subpart G for process wastewater as specified in 40 CFR § 63.1095(a)(2) are selected for control of the waste stream(s). *If the response to Question VIII.W.28 is "NO," go to Question VIII.W.33.*	☐YES ☐NO
29.	The application area includes containers that receive, manage, or treat a continuous butadiene waste stream.	☐YES ☐NO
30.	The application area includes individual drain systems that receive, manage, or treat a continuous butadiene waste stream. *If the response to Question VIII.W.30 is "NO," go to Question VIII.W.43.*	☐YES ☐NO
31.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	☐YES ☐NO

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Form OP-REQ1: Page 61		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)		
32.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs. *If the response to Question VIII.W.32 is required, go to Question VIII.W.43.*	☐YES ☐NO
33.	The application area has containers, as defined in 40 CFR § 61.341, that receive a continuous butadiene waste stream. *If the response to Question VIII.W.33 is "NO," go to Question VIII.W.36.*	☐YES ☐NO
34.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. *If the response to Question VIII.W.34 is "YES," go to Question VIII.W.36.*	☐YES ☐NO
35.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	☐YES ☐NO
36.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a continuous butadiene waste stream. *If the response to Question VIII.W.36 is "NO," go to Question VIII.W.43.*	☐YES ☐NO
37.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. *If the response to Question VIII.W.37 is "YES," go to Question VIII.W.43.*	☐YES ☐NO

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Form OP-REQ1: Page 62		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W. Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)		
38.	The application area has individual drain systems complying with 40 CFR § 61.346(a). *If the response to Question VIII.W.38 is "NO," go to Question VIII.W.40.*	☐YES ☐NO
39.	Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	☐YES ☐NO
40.	The application area has individual drain systems complying with 40 CFR § 61.346(b). *If the response to Question VIII.W.40 is "NO," go to Question VIII.W.43.*	☐YES ☐NO
41.	Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	☐YES ☐NO
42.	Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	☐YES ☐NO
43.	The application area has at least one waste stream that contains benzene. *If the response to Question VIII.W.43 is "NO," go to Question VIII.W.54.*	☐YES ☐NO
44.	The application area has containers, as defined in 40 CFR § 61.341, that receive a waste stream containing benzene. *If the response to Question VIII.W.44 is "NO," go to Question VIII.W.47.*	☐YES ☐NO
45.	The application area is an alternate means of compliance to meet the 40 CFR § 61.345 requirements for containers. *If the response to Question VIII.W.45 is "YES," go to Question VIII.W.47.*	☐YES ☐NO

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Form OP-REQ1: Page 63		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W.	**Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)**	
46.	Covers and closed-vent systems used for containers operate such that the container is maintained at a pressure less than atmospheric pressure.	☐YES ☐NO
47.	The application area has individual drain systems, as defined in 40 CFR § 61.341, that receive or manage a waste stream containing benzene. *If the response to Question VIII.W.47 is "NO," go to Question VIII.W.54.*	☐YES ☐NO
48.	The application area is using an alternate means of compliance to meet the 40 CFR § 61.346 requirements for individual drain systems. *If the response to Question VIII.W.48 is "YES," go to Question VIII.W.54.*	☐YES ☐NO
49.	The application area has individual drain systems complying with 40 CFR § 61.346(a). *If the response to Question VIII.W.49 is "NO," go to Question VIII.W.51.*	☐YES ☐NO
50.	Covers and closed-vent systems used for individual drain systems operate such that the individual drain system is maintained at a pressure less than atmospheric pressure.	☐YES ☐NO
51.	The application area has individual drain systems complying with 40 CFR § 61.346(b). *If the response to Question VIII.W.51 is "NO," go to Question VIII.W.54.*	☐YES ☐NO
52.	Junction boxes in the individual drain systems are equipped with a system to prevent the flow of organic vapors from the junction box vent pipe to the atmosphere during normal operation.	☐YES ☐NO

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Form OP-REQ1: Page 64		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
W.	**Subpart YY - National Emission Standards for Hazardous Air Pollutants for Source Categories - Generic Maximum Achievable Control Technology Standards (continued)**	
53.	Junction box vent pipes in the individual drain systems are connected to a closed-vent system and control device.	☐YES ☐NO
54.	The application area contains a cyanide chemicals manufacturing process. *If the response to Question VIII.W.54 is "NO," go to Section VIII.X.*	☐YES ☒NO
55.	The cyanide chemicals manufacturing process generates maintenance wastewater containing hydrogen cyanide or acetonitrile.	☐YES ☐NO
X.	**Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins**	
1.	The application area includes thermoplastic product process units, and/or their associated affected sources specified in 40 CFR § 63.1310(a)(1) - (5), that are subject to 40 CFR Part 63, Subpart JJJ. *If the response to Question VIII.X.1 is "NO," go to Section VIII.Y.*	☐YES ☒NO
2.	The application area includes thermoplastic product process units and/or wastewater streams and wastewater operations that are associated with thermoplastic product process units. *If the response to Question VIII.X.2 is "NO," go to Section VIII.Y.*	☐YES ☐NO
3.	All process wastewater streams generated or managed in the application area are from sources producing polystyrene. *If the response to Question VIII.X.3 is "YES," go to Section VIII.Y.*	☐YES ☐NO
4.	All process wastewater streams generated or managed in the application area are from sources producing ASA/AMSAN. *If the response to Question VIII.X.4 is "YES," go to Section VIII.Y.*	☐YES ☐NO

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Form OP-REQ1: Page 65		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)		
5.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for organic HAPs as defined in 40 CFR § 63.1312.	☐YES ☐NO
6.	The application area includes process wastewater streams, located at existing sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	☐YES ☐NO
7.	The application area includes process wastewater streams, located at new sources, that are Group 2 for organic HAPs as defined in 40 CFR § 63.1312.	☐YES ☐NO
8.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. *If the response to Question VIII.X.8 is "YES," go to Question VIII.X.18.*	☐YES ☐NO
9.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. *If the response to Question VIII.X.9 is "NO," go to Question VIII.X.11.*	☐YES ☐NO
10.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	☐YES ☐NO
11.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	☐YES ☐NO
12.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. *If the responses to Questions VIII.X.11 - VIII.X.12 are both "NO," go to Question VIII.X.14.*	☐YES ☐NO

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Form OP-REQ1: Page 66		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)		
13.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	☐YES ☐NO
Containers		
14.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	☐YES ☐NO
Drains		
15.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream. *If the response to Question VIII.X.15 is "NO," go to Question VIII.X.18.*	☐YES ☐NO
16.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	☐YES ☐NO
17.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐YES ☐NO
18.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of an thermoplastic product process unit. *If the response to Question VIII.X.18 is "NO," go to Section VIII.Y.*	☐YES ☐NO

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Form OP-REQ1: Page 67		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
X. Subpart JJJ - National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins (continued)		
	***Drains* (continued)**	
19.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that meet the criteria listed in 40 CFR § 63.149(d) and § 63.1330(b)(12). *If the response to Question VIII.X.19 is "NO," go to Section VIII.Y.*	☐YES ☐NO
20.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration greater than or equal to 10,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at any flow rate.	☐YES ☐NO
21.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration greater than or equal to 1,000 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an annual average flow rate greater than or equal to 10 liters per minute.	☐YES ☐NO
22.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of an thermoplastic product process unit that is a new affected source or part of a new affected source and the equipment conveys water with a total annual average concentration greater than or equal to 10 parts per million by weight of compounds meeting the definition of organic HAP in 40 CFR § 63.1312, at an average annual flow rate greater than or equal to 0.02 liter per minute	☐YES ☐NO

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Form OP-REQ1: Page 68			
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)			
	Y.	**Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.**	
	1.	The application area is subject to 40 CFR Part 63, Subpart UUU - National Emission Standards for Hazardous Air Pollutants for Petroleum Refineries: Catalytic Cracking Units, Catalytic reforming Units, and Sulfur Recovery Units.	☐YES ☒NO
	Z.	**Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste (MSW) Landfills.**	
♦	1.	The application area is subject to 40 CFR Part 63, Subpart AAAA - National Emission Standards for Hazardous Air Pollutants for Municipal Solid Waste Landfills.	☐YES ☒NO
	AA.	**Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON)**	
	1.	The application area is located at a site that includes process units that manufacture as a primary product one or more of the chemicals listed in 40 CFR § 63.2435(b)(1).	☐YES ☒NO
	2.	The application area is located at a plant site that is a major source as defined in FCAA § 112(a).	☒YES ☐NO
	3.	The application area is located at a site that includes miscellaneous chemical manufacturing process units (MCPU) that process, use or generate one or more of the organic hazardous air pollutants listed in § 112(b) of the Clean Air Act or hydrogen halide and halogen HAP. *If the response to Question VIII.AA.1, AA.2 or AA.3 is "NO," go to Section VIII.BB.*	☐YES ☒NO
	4.	The application area includes process vents, storage vessels, transfer racks, or waste streams associated with a miscellaneous chemical manufacturing process subject to 40 CFR 63, Subpart FFFF. *If the response to Question VIII.AA.4 is "NO," go to Section VIII.BB.*	☐YES ☐NO

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Form OP-REQ1: Page 69		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)		
5.	The application area includes process wastewater streams. *If the response to Question VIII.AA.5 is "NO," go to Question VIII.AA.18.*	☐YES ☐NO
6.	The application area includes process wastewater streams that are designated as Group 1 or are determined to be Group 1 for compounds listed in Table 8 of 40 CFR Part 63, Subpart G or Table 8 and Table 9, as appropriate, of 40 CFR Part 63, Subpart FFFF.	☐YES ☐NO
7.	The application area includes process wastewater streams that are Group 2 for compounds listed in Table 8 or Table 8 and Table 9, as appropriate, of 40 CFR Part 63, Subpart FFFF.	☐YES ☐NO
8.	All Group 1 wastewater streams at the site are demonstrated to have a total source mass flow rate of less than 1 MG/yr. *If the response to Question VIII.AA.8 is "YES," go to Section VIII.AA.22.*	☐YES ☐NO
9.	The site has untreated and/or partially treated Group 1 wastewater streams demonstrated to have a total source mass flow rate of less than 1 MG/yr. *If the response to Question VIII.AA.9 is "NO," go to Question VIII.AA.11.*	☐YES ☐NO
10.	The application area includes waste management units that receive or manage a partially treated Group 1 wastewater stream prior to or during treatment.	☐YES ☐NO
11.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an on-site treatment operation that is not owned or operated by the owner or operator of the source generating the waste stream or residual.	☐YES ☐NO
12.	Group 1 wastewater streams or residual removed from Group 1 wastewater streams are transferred to an off-site treatment operation. *If the responses to Questions VIII.AA.11 and VIII.AA.12 are both "NO," go to Question VIII.AA.18.*	☐YES ☐NO

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Form OP-REQ1: Page 70		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)		
13.	Group 1 wastewater streams are transferred to an offsite treatment facility meeting the requirements of 40 CFR § 63.138(h). *If the response to Question VIII.AA.13 is "NO," go to Question VIII.AA.15.*	☐YES ☐NO
14.	The option to document in the notification of compliance status report that the wastewater will be treated in a facility meeting the requirements of 40 CFR § 63.138(h) is elected.	☐YES ☐NO
15.	Group 1 wastewater streams or residuals with a total annual average concentration of compounds in Table 8 of 40 CFR Part 63, Subpart FFFF less than 50 ppmw are transferred offsite. *If the response to Question VIII.AA.15 is "NO," go to Question VIII.AA.17.*	☐YES ☐NO
16.	The transferor is demonstrating that less than 5 percent of the HAP in Table 9 of 40 CFR Part 63, Subpart FFFF is emitted from waste management units up to the activated sludge unit.	☐YES ☐NO
17.	The application area includes waste management units that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream prior to shipment or transport.	☐YES ☐NO
18.	The application area includes containers that receive, manage, or treat a Group 1 wastewater stream or a residual removed from a Group 1 wastewater stream.	☐YES ☐NO
19.	The application area includes individual drain systems that receive or manage a Group 1 wastewater stream, or a residual removed from a Group 1 wastewater stream. *If the response to Question VIII.AA.19 is "NO," go to Question VIII.AA.22.*	☐YES ☐NO
20.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of cover and, if vented, closed vent systems and control devices.	☐YES ☐NO

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Form OP-REQ1: Page 71		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)		
21.	The application area includes individual drain systems that are complying with 40 CFR § 63.136 through the use of water seals or tightly fitting caps or plugs.	☐YES ☐NO
22.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that are part of a chemical manufacturing process unit that meets the criteria of 40 CFR § 63.100(b). *If the response to Question VIII.AA.22 is "NO," go to Section VIII.BB.*	☐YES ☐NO
23.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes (that are part of a miscellaneous chemical manufacturing process unit) that meet the criteria listed in 40 CFR § 63.149(d). *If the response to Question VIII.AA.23 is "NO," go to Section VIII.BB.*	☐YES ☐NO
24.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 10,000 ppmw at any flow rate, and the total annual load of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 200 lb/yr.	☐YES ☐NO
25.	The application area includes drains, drain hubs, manholes, lift stations, trenches, or pipes that convey water with a total annual average concentration of compounds in table 8 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 1,000 ppmw, and the annual average flow rate is greater than or equal to 1 liter per minute.	☐YES ☐NO
26.	The application area includes drains, drain hubs, manholes, lift stations, trenches or pipes that are part of a chemical manufacturing process unit that is subject to the new source requirements of 40 CFR § 63.2445(a); and the equipment conveys water with a combined total annual average concentration of compounds in tables 8 and 9 of 40 CFR Part 63, Subpart FFFF is greater than or equal to 30,000 ppmw, and the combined total annual load of compounds in tables 8 and 9 to this subpart is greater than or equal to 1 tpy.	☐YES ☐NO

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Form OP-REQ1: Page 72		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
AA. Subpart FFFF - National Emission Standards for Hazardous Air Pollutants for Miscellaneous Organic Chemical Production and Processes (MON) (continued)		
BB. Subpart GGGG - National Emission Standards for Hazardous Air Pollutants for: Solvent Extractions for Vegetable Oil Production.		
1.	The application area includes a vegetable oil production process that: is by itself a major source of HAP emissions or, is collocated within a plant site with other sources that are individually or collectively a major source of HAP emissions.	☐YES ☒NO
CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation		
1.	The application area includes a facility at which a site remediation is conducted. *If the answer to Question VIII.CC.1 is "NO," go to Section VIII.DD.*	☐YES ☒NO
2.	The application area is located at a site that is a major source of HAP. *If the answer to Question VIII.CC.2 is "NO," go to Section VIII.DD.*	☐YES ☐NO
3.	All site remediation's qualify for one of the exemptions contained in 40 CFR § 63.7881(b)(1) through (6). *If the answer to Question VIII.CC.3 is "YES," go to Section VIII.DD.*	☐YES ☐NO
4.	Prior to beginning site remediation activities it was determined that the total quantity of HAP listed in Table 1 of Subpart GGGGG that will be removed during all site remediations will be less than 1 Mg/yr. *If the answer to Question VIII.CC.4 is "YES," go to Section VIII.DD.*	☐YES ☐NO
5.	The site remediation will be completed within 30 consecutive calendar days.	☐YES ☐NO
6.	No site remediation will exceed 30 consecutive calendar days. *If the answer to Question VIII.CC.6 is "YES," go to Section VIII.DD.*	☐YES ☐NO
7.	Site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility.	☐YES ☐NO
8.	All site remediation materials subject to 40 CFR Part 63, Subpart GGGGG are transferred from the application area to an off-site facility. *If the answer to Question VIII.CC.8 is "YES," go to Section VIII.DD.*	☐YES ☐NO

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Form OP-REQ1: Page 73		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
CC. Subpart GGGGG - National Emission Standards for Hazardous Air Pollutants: Site Remediation (continued)		
9.	The application area includes containers that manage site remediation materials subject to 40 CFR Part 63, Subpart GGGGG. *If the response to Question VIII.CC.9 is "NO," go to Question VIII.CC.14.*	☐YES ☐NO
10.	The application area includes containers using Container Level 1 controls as specified in 40 CFR § 63.922(b).	☐YES ☐NO
11.	The application area includes containers with a capacity greater than 0.46 m^3 that meet the requirements of 40 CFR § 63.7900(b)(3)(i) and (ii).	☐YES ☐NO
12.	The application area includes containers using Container Level 2 controls as specified in 40 CFR § 63.923(b).	☐YES ☐NO
13.	The application area includes containers using Container Level 3 controls as specified in 40 CFR § 63.924(b).	☐YES ☐NO
14.	The application area includes individual drain systems complying with the requirements of 40 CFR § 63.962.	☐YES ☐NO
DD. Subpart YYYYY - National Emission Standards for Hazardous Air Pollutants for Area/Sources: Electric Arc Furnace Steelmaking Facilities		
1.	The application area includes an electric arc furnace (EAF) steelmaking facility, and the site is an area source of hazardous air pollutant (HAP) emissions. *If the response to Question VIII.DD.1 is "NO," go to Section VIII.EE.*	☐YES ☒NO
2.	The EAF steelmaking facility is a research and development facility. *If the response to Question VIII.DD.2 is "YES," go to Section VIII.EE.*	☐YES ☐NO
3.	Metallic scrap is utilized in the EAF.	☐YES ☐NO
4.	Scrap containing motor vehicle scrap is utilized in the EAF.	☐YES ☐NO
5.	Scrap not containing motor vehicle scrap is utilized in the EAF.	☐YES ☐NO

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Form OP-REQ1: Page 74		
VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)		
EE. Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities		
1.	The application area is located at a site that is an area source of HAPs. *If the answer to Question EE.1 is "NO," go to Section VIII.FF.*	☐YES ☒NO
2.	The application area includes a pipeline breakout station, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R.	☐YES ☐NO
3.	The application area includes a pipeline pumping station as defined in 40 CFR Part 63, Subpart BBBBBB.	☐YES ☐NO
4.	The application area includes a bulk gasoline plant as defined in 40 CFR Part 63, Subpart BBBBBB. *If the answer to Question VIII.EE.4 is "NO," go to Question VIII.EE.6.*	☐YES ☐NO
5.	The bulk gasoline plant was operating, prior to January 10, 2010, in compliance with an enforceable State, local or tribal rule or permit that requires submerged fill as specified in 40 CFR § 63.11086(a).	☐YES ☐NO
6.	The application area includes a bulk gasoline terminal, as defined in 40 CFR Part 63, Subpart BBBBBB, not subject to the control requirements of 40 CFR Part 63, Subpart R or Subpart CC. *If the answer to Question VIII.EE.6 is "NO," go to Section VIII.FF.*	☐YES ☐NO
7.	The bulk gasoline terminal has throughput of less than 250,000 gallons per day. *If the answer to Question VIII.EE.7 is "YES," go to Section VIII.FF.*	☐YES ☐NO
8.	The bulk gasoline terminal loads gasoline into gasoline cargo tanks other than railcar cargo tanks.	☐YES ☐NO
9.	The bulk gasoline terminal loads gasoline into railcar cargo tanks. *If the answer to Question VIII.EE.9 is "NO," go to Section VIII.FF.*	☐YES ☐NO
10.	The bulk gasoline terminal loads gasoline into railcar cargo tanks which do not collect vapors from a vapor balance system.	☐YES ☐NO

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VIII. Title 40 Code of Federal Regulations Part 63 - National Emission Standards for Hazardous Air Pollutants for Source Categories (continued)			
	EE.	**Subpart BBBBBB - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Distribution Bulk Terminals, Bulk Plants and Pipeline Facilities (continued)**	
	11.	The bulk gasoline terminal loads gasoline into railcar cargo tanks which collect vapors from a vapor balance system and that system complies with a Federal, State, local, tribal rule or permit.	☐YES ☐NO
	FF.	**Subpart CCCCCC - National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities**	
♦	1.	The application area is located at a site that is an area source of hazardous air pollutants. *If the answer to Question VIII.FF.1 is "NO," go to Section VIII.GG.*	☐YES ☒NO
♦	2.	The application area includes at least one gasoline dispensing facility as defined in 40 CFR § 63.11132. *If the answer to Question VIII.FF.2 is "NO," go to Section VIII.GG.*	☐YES ☐NO
♦	3.	The application area includes at least one gasoline dispensing facility with a monthly throughput of less than 10,000 gallons.	☐YES ☐NO
♦	4.	The application area includes at least one gasoline dispensing facility where gasoline is dispensed from a fixed gasoline storage tank into a portable gasoline tank for the on-site delivery and subsequent dispensing into other gasoline-fueled equipment.	☐YES ☐NO
	GG.	**Recently Promulgated 40 CFR Part 63 Subparts**	
♦	1.	The application area is subject to one or more promulgated 40 CFR Part 63 subparts not addressed on this form. *If the response to Question VIII.GG.1 is "NO," go to Section IX. A list of promulgated 40 CFR Part 63 subparts not otherwise addressed on OP-REQ1 is included in the instructions.*	☒YES ☐NO
♦	2.	Provide the Subpart designation (i.e. Subpart EEE) in the space provided below. **Subpart LLL**	

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IX.	**Title 40 Code of Federal Regulations Part 68 (40 CFR Part 68) - Chemical Accident Prevention Provisions**		
	A.	**Applicability**	
♦	1.	The application area contains processes subject to 40 CFR Part 68, Chemical Accident Prevention Provisions, and specified in 40 CFR § 68.10.	☐YES ☒NO
X.	**Title 40 Code of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratospheric Ozone**		
	A.	**Subpart A - Production and Consumption Controls**	
♦	1.	The application area is located at a site that produces, transforms, destroys, imports, or exports a controlled substance or product.	☐YES ☒NO ☐N/A
	B.	**Subpart B - Servicing of Motor Vehicle Air Conditioners**	
♦	1.	Servicing, maintenance, and/or repair of fleet vehicle air conditioning systems using ozone-depleting refrigerants is conducted in the application area.	☒YES ☐NO
	C.	**Subpart C - Ban on Nonessential Products Containing Class I Substances and Ban on Nonessential Products Containing or Manufactured with Class II Substances**	
♦	1.	The application area sells or distributes one or more nonessential products (which release a Class I or Class II substance) that are subject to 40 CFR Part 82, Subpart C.	☐YES ☒NO ☐N/A
	D.	**Subpart D - Federal Procurement**	
♦	1.	The application area is owned/operated by a department, agency, or instrumentality of the United States.	☐YES ☒NO ☐N/A
	E.	**Subpart E - The Labeling of Products Using Ozone Depleting Substances**	
♦	1.	The application area includes containers in which a Class I or Class II substance is stored or transported prior to the sale of the Class I or Class II substance to the ultimate consumer.	☐YES ☒NO ☐N/A
♦	2.	The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products containing a Class I or Class II substance.	☐YES ☒NO ☐N/A
♦	3.	The application area is a manufacturer, importer, wholesaler, distributor, or retailer of products manufactured with a process that uses a Class I or Class II substance.	☐YES ☒NO ☐N/A

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X.	**Title 40 Code of Federal Regulations Part 82 (40 CFR Part 82) - Protection of Stratospheric Ozone (continued)**			
	F.	**Subpart F - Recycling and Emissions Reduction**		
♦	1.	Servicing, maintenance, and/or repair on refrigeration and non-motor vehicle air condition appliances using ozone-depleting refrigerants or non-exempt substitutes is conducted in the application area.	☒YES	☐NO
♦	2.	Disposal of appliances (including motor vehicle air conditioners) or refrigerant or non-exempt substitute reclamation occurs in the application area.	☐YES	☒NO ☐N/A
♦	3.	The application area manufactures appliances or refrigerant recycling and recovery equipment.	☐YES	☒NO ☐N/A
	G.	**Subpart G - Significant New Alternatives Policy Program**		
♦	1.	The application area manufactures, formulates, or creates chemicals, product substitutes, or alternative manufacturing processes that are intended for use as a replacement for a Class I or Class II compound. *If the response to Question X.G.1 is "NO" or "N/A," go to Section X.H.*	☐YES	☒NO ☐N/A
♦	2.	All substitutes produced by the application area meet one or more of the exemptions in 40 CFR § 82.176(b)(1) - (7).	☐YES	☐NO ☐N/A
	H.	**Subpart H -Halon Emissions Reduction**		
♦	1.	Testing, servicing, maintaining, repairing, or disposing of equipment containing halons is conducted in the application area.	☐YES	☒NO ☐N/A
♦	2.	Disposal of halons or manufacturing of halon blends is conducted in the application area.	☐YES	☒NO ☐N/A
XI.	**Miscellaneous**			
	A.	**Requirements Reference Tables (RRT) and Flowcharts**		
	1.	The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed an RRT and flowchart.	☐YES	☒NO

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XI.	**Miscellaneous (continued)**		
	B.	**Forms**	
♦	1.	The application area contains units that are potentially subject to a regulation for which the TCEQ has not developed a unit attribute form. *If the response to Question XI.B.1 is "NO" or "N/A," go to Section XI.C.*	☐YES ☒NO ☐N/A
♦	2.	Provide the Part and Subpart designation for the federal rule(s) or the Chapter, Subchapter, and Division designation for the State regulation(s) in the space provided below.	
	C.	**Emission Limitation Certifications**	
♦	1.	The application area includes units for which federally enforceable emission limitations have been established by certification.	☐YES ☒NO
	D.	**Alternative Means of Control, Alternative Emission Limitation or Standard, or Equivalent Requirements**	
	1.	The application area is located at a site that is subject to a site-specific requirement of the state implementation plan (SIP).	☐YES ☒NO
	2.	The application area includes units located at the site that are subject to a site-specific requirement of the SIP.	☐YES ☒NO
	3.	The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the EPA Administrator. *If the response to Question XI.D.3 is "YES," please include a copy of the approval document with the application.*	☐YES ☒NO
	4.	The application area includes units which demonstrate compliance by using an alternative means of control, alternative emission limitation or standard or equivalent requirements approved by the TCEQ Executive Director. *If the response to Question XI.D.4 is "YES," please include a copy of the approval document with the application.*	☐YES ☒NO

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XI.	**Miscellaneous (continued)**		
	E.	**Title IV - Acid Rain Program**	
	1.	The application area includes emission units subject to the Acid Rain Program (ARP), including the Opt-In Program.	☐YES ☒NO
	2.	The application area includes emission units qualifying for the new unit exemption under 40 CFR § 72.7.	☐YES ☒NO
	3.	The application area includes emission units qualifying for the retired unit exemption under 40 CFR § 72.8.	☐YES ☒NO
	F.	**40 CFR Part 97, Subpart EEEEE - Cross-State Air Pollution Rule (CSAPR) NO_X Ozone Season Group 2 Trading Program**	
	1.	The application area includes emission units subject to the requirements of the CSAPR NO_X Ozone Season Group 2 Trading Program. *If the response to Question XI.F.1 is "NO," go to Question XI.F.7.*	☐YES ☒NO
	2.	The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO_X and heat input.	☐YES ☐NO
	3.	The application area includes gas or oil-fired units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart H for NO_X, and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	☐YES ☐NO
	4.	The application area includes gas or oil-fired peaking units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix E for NO_X, and the monitoring requirements of 40 CFR Part 75, Appendix D for heat input.	☐YES ☐NO
	5.	The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for NO_X and heat input.	☐YES ☐NO
	6.	The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for NO_X and heat input.	☐YES ☐NO
	7.	The application area includes emission units that qualify for the CSAPR NO_X Ozone Season Group 2 retired unit exemption.	☐YES ☒NO

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XI.	**Miscellaneous (continued)**		
	G.	**40 CFR Part 97, Subpart FFFFF - Texas SO_2 Trading Program**	
	1.	The application area includes emission units complying with the requirements of the Texas SO_2 Trading Program. *If the response to Question XI.G.1 is "NO," go to Question XI.G.6.*	☐YES ☒NO
	2.	The application area includes units that are complying with the CEMS requirements of 40 CFR Part 75, Subpart B for SO_2 and 40 CFR Part 75, Subpart H for heat input.	☐YES ☐NO
	3.	The application area includes gas or oil-fired units that are complying with the monitoring requirements of 40 CFR Part 75, Appendix D for SO_2 and heat input.	☐YES ☐NO
	4.	The application area includes gas or oil-fired units that are complying with the Low Mass Emissions monitoring requirements of 40 CFR § 75.19 for SO_2 and heat input.	☐YES ☐NO
	5.	The application area includes units that are complying with EPA-approved alternative monitoring system requirements of 40 CFR Part 75, Subpart E for SO_2 and heat input.	☐YES ☐NO
	6.	The application area includes emission units that qualify for the Texas SO_2 Trading Program retired unit exemption.	☐YES ☒NO
	H.	**Permit Shield (SOP Applicants Only)**	
	1.	A permit shield for negative applicability entries on Form OP-REQ2 (Negative Applicable Requirement Determinations) is being requested or already exists in the permit.	☒YES ☐NO

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XI.	**Miscellaneous (continued)**		
	I.	**GOP Type (Complete this section for GOP applications only)**	
♦	1.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 511 - Oil and Gas General Operating Permit for Brazoria, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Montgomery, Orange, Parker, Rockwall, Tarrant, Waller, and Wise Counties.	☐YES ☐NO
♦	2.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 512 - Oil and Gas General Operating Permit for Gregg, Nueces, and Victoria Counties.	☐YES ☐NO
♦	3.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 513 - Oil and Gas General Operating Permit for Aransas, Bexar, Calhoun, Matagorda, San Patricio, and Travis Counties.	☐YES ☐NO
♦	4.	The application area is applying for initial issuance, revision, or renewal of an oil and gas general operating permit under GOP No. 514 - Oil and Gas General Operating Permit for All Texas Counties Except Aransas, Bexar, Brazoria, Calhoun, Chambers, Collin, Dallas, Denton, El Paso, Ellis, Fort Bend, Galveston, Gregg, Hardin, Harris, Jefferson, Johnson, Kaufman, Liberty, Matagorda, Montgomery, Nueces, Orange, Parker, Rockwall, San Patricio, Tarrant, Travis, Victoria, Waller, and Wise County.	☐YES ☐NO
♦	5.	The application area is applying for initial issuance, revision, or renewal of a solid waste landfill general operating permit under GOP No. 517 - Municipal Solid Waste Landfill general operating permit.	☐YES ☐NO
	J.	**Title 30 TAC Chapter 101, Subchapter H**	
♦	1.	The application area is located in a nonattainment area. *If the response to Question XI.J.1 is "NO," go to question XI.J.3.*	☐YES ☒NO
♦	2.	The applicant has or will generate emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	☐YES ☐NO ☐N/A
♦	3.	The applicant has or will generate discrete emission reductions to be credited in the TCEQ Emissions Banking and Trading Program.	☐YES ☒NO ☐N/A

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♦ *For GOP applications, answer ONLY these questions unless otherwise directed.*

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XI.	**Miscellaneous (continued)**		
	J.	**Title 30 TAC Chapter 101, Subchapter H (continued)**	
♦	4.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area where the facilities have a collective uncontrolled design capacity to emit 10 tpy or more of NO_X.	☐YES ☒NO
♦	5.	The application area includes an electric generating facility permitted under 30 TAC Chapter 116, Subchapter I.	☐YES ☒NO
♦	6.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area and the site has a potential to emit more than 10 tpy of highly-reactive volatile organic compounds (HRVOC) from facilities covered under 30 TAC Chapter 115, Subchapter H, Divisions 1 and 2.	☐YES ☒NO
♦	7.	The application area is located at a site in the Houston/Galveston/Brazoria nonattainment area, the site has a potential to emit 10 tpy or less of HRVOC from covered facilities and the applicant is opting to comply with the requirements of 30 TAC Chapter 101, Subchapter H, Division 6, Highly Reactive VOC Emissions Cap and Trade Program.	☐YES ☒NO
	K.	**Periodic Monitoring**	
♦	1.	The applicant or permit holder is submitting at least one periodic monitoring proposal described on Form OP-MON in this application.	☒YES ☐NO
♦	2.	The permit currently contains at least one periodic monitoring requirement. *If the responses to Questions XI.K.1 and XI.K.2 are both "NO," go to Section XI.L.*	☒YES ☐NO
♦	3.	All periodic monitoring requirements are being removed from the permit with this application.	☐YES ☒NO

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XI.	**Miscellaneous (continued)**		
	L.	**Compliance Assurance Monitoring**	
♦	1.	The application area includes at least one unit that does not meet the CAM exemptions in 40 CFR § 64.2(b) for all applicable requirements that it is subject to, and the unit has a pre-control device potential to emit greater than or equal to the amount in tons per year required in a site classified as a major source. *If the response to Question XI.L.1 is "NO," go to Section XI.M.*	☐YES ☒NO
♦	2.	The unit or units defined by XI.L.1 are using a control device to comply with an applicable requirement. *If the response to Question XI.L.2 is "NO," go to Section XI.M.*	☐YES ☐NO
♦	3.	The permit holder has submitted a CAM proposal on Form OP-MON in a previous application.	☐YES ☐NO
♦	4.	The owner/operator or permit holder is submitting a CAM proposal on Form OP-MON according to the deadlines for submittals in 40 CFR § 64.5 in this application. *If the responses to Questions XI.L.3 and XI.L.4 are both "NO," go to Section XI.M.*	☐YES ☐NO
	5.	The owner/operator or permit holder is submitting a CAM implementation plan and schedule to be incorporated as enforceable conditions in the permit.	☐YES ☐NO
	6.	Provide the unit identification numbers for the units for which the applicant is submitting a CAM implementation plan and schedule in the space below.	
♦	7.	At least one unit defined by XI.L.1 and XI.L.2 is using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2).	☐YES ☐NO
♦	8.	All units defined by XI.L.1 and XI.L.2 are using a CEMS, COMS or PEMS meeting the requirements of 40 CFR § 64.3(d)(2). *If the response to Question XI.L.8 is "YES," go to Section XI.M.*	☐YES ☐NO

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XI.	**Miscellaneous (continued)**		
	L.	**Compliance Assurance Monitoring (continued)**	
♦	9.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses particulate matter, and the emission unit has a capture system as defined in 40 CFR §64.1.	☐YES ☐NO
♦	10.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	☐YES ☐NO
♦	11.	At least one of the CAM proposals as described by question XI.L.3 or XI.L.4 addresses a regulated pollutant other than particulate matter or VOC, and the emission unit has a capture system as defined in 40 CFR §64.1.	☐YES ☐NO
♦	12.	The control device in the CAM proposal as described by question XI.L.3 or XI.L.4 has a bypass.	☐YES ☐NO
	M.	**Title 30 TAC Chapter 113, Subchapter D, Division 5 - Emission Guidelines and Compliance Times**	
♦	1.	The application area includes at least one air curtain incinerator that commenced construction on or before December 9, 2004. *If the response to Question XI.M.1 is "NO," or "N/A," go to Section XII.*	☐YES ☒NO ☐N/A
♦	2.	All air curtain incinerators constructed on or before December 9, 2004 combust only wood waste, clean lumber, or yard waste or a mixture of these materials.	☐YES ☐NO
XII.	**New Source Review (NSR) Authorizations**		
	A.	**Waste Permits with Air Addendum**	
♦	1.	The application area includes a Municipal Solid Waste Permit or an Industrial Hazardous Waste with an Air Addendum. *If the response to XII.A.1 is "YES," include the waste permit numbers and issuance date in Section XII.J.*	☐YES ☒NO

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XII. New Source Review (NSR) Authorizations (continued)			
	B.	**Air Quality Standard Permits**	
♦	1.	The application area includes at least one Air Quality Standard Permit NSR authorization. *If the response to XII.B.1 is "NO," go to Section XII.C. If the response to XII.B.1 is "YES," be sure to include the standard permit's registration numbers in Section XII.H and answer XII.B.2 - B.16 as appropriate.*	☒YES ☐NO
♦	2.	The application area includes at least one "State Pollution Control Project" Air Quality Standard Permit NSR authorization under 30 TAC § 116.617.	☒YES ☐NO
♦	3.	The application area includes at least one non-rule Air Quality Standard Permit for Pollution Control Projects NSR authorization.	☐YES ☒NO
♦	4.	The application area includes at least one "Installation and/or Modification of Oil and Gas Facilities" Air Quality Standard Permit NSR authorization under 30 TAC § 116.620.	☐YES ☒NO
♦	5.	The application area includes at least one non-rule Air Quality Standard Permit for Oil and Gas Handling and Production Facilities NSR authorization.	☐YES ☒NO
♦	6.	The application area includes at least one "Municipal Solid Waste Landfill" Air Quality Standard Permit NSR authorization under 30 TAC § 116.621.	☐YES ☒NO
♦	7.	The application area includes at least one "Municipal Solid Waste Landfill Facilities and Transfer Stations" Standard Permit authorization under 30 TAC Chapter 330, Subchapter U.	☐YES ☒NO
	8.	The application area includes at least one "Concrete Batch Plant" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	9.	The application area includes at least one "Concrete Batch Plant with Enhanced Controls" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	10.	The application area includes at least one "Hot Mix Asphalt Plant" Air Quality Standard Permit NSR authorization.	☐YES ☒NO

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XII. New Source Review (NSR) Authorizations (continued)			
	B.	**Air Quality Standard Permits (continued)**	
♦	11.	The application area includes at least one "Rock Crusher" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	12.	The application area includes at least one "Electric Generating Unit" Air Quality Standard Permit NSR authorization. *If the response to XII.B.12 is "NO," go to Question XII.B.15.*	☐YES ☒NO
♦	13.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the East Texas Region.	☐YES ☐NO
♦	14.	For purposes of "Electric Generating Unit" Air Quality Standard Permit, the application area is located in the West Texas Region.	☐YES ☐NO
♦	15.	The application area includes at least one "Boiler" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
♦	16.	The application area includes at least one "Sawmill" Air Quality Standard Permit NSR authorization.	☐YES ☒NO
	C.	**Flexible Permits**	
	1.	The application area includes at least one Flexible Permit NSR authorization.	☐YES ☒NO
	D.	**Multiple Plant Permits**	
	1.	The application area includes at least one Multi-Plant Permit NSR authorization.	☐YES ☒NO

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XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)

E. PSD Permits and PSD Major Pollutants

PSD Permit No.: PSD-TX-1101	Issuance Date: 07/06/2017	Pollutant(s): PM, PM10, Fluorides
PSD Permit No.:	Issuance Date:	Pollutant(s):
PSD Permit No.:	Issuance Date:	Pollutant(s):
PSD Permit No.:	Issuance Date:	Pollutant(s):

If PSD Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

F. Nonattainment (NA) Permits and NA Major Pollutants

NA Permit No.:	Issuance Date:	Pollutant(s):
NA Permit No.:	Issuance Date:	Pollutant(s):
NA Permit No.:	Issuance Date:	Pollutant(s):
NA Permit No.:	Issuance Date:	Pollutant(s):

If NA Permits are held for the application area, please complete the Major NSR Summary Table located under the Technical Forms heading at: www.tceq.texas.gov/permitting/air/titlev/site/site_experts.html.

G. NSR Authorizations with FCAA § 112(g) Requirements

NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:
NSR Permit No.:	Issuance Date:	NSR Permit No.:	Issuance Date:

♦ **H. Title 30 TAC Chapter 116 Permits, Special Permits, Standard Permits, Other Authorizations (Other Than Permits By Rule, PSD Permits, NA Permits) for the Application Area**

Authorization No.: 82775	Issuance Date: 07/06/2017	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:
Authorization No.:	Issuance Date:	Authorization No.:	Issuance Date:

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XII. NSR Authorizations (Attach additional sheets if necessary for sections E-J)	
♦ **I. Permits by Rule (30 TAC Chapter 106) for the Application Area**	
A list of selected Permits by Rule (previously referred to as standard exemptions) that are required to be listed in the FOP application is available in the instructions.	
PBR No.: 106.261	Version No./Date: 11/01/2003
PBR No.: 106.144	Version No./Date: 09/04/2000
PBR No.: 106.478	Version No./Date: 03/14/1997
PBR No.: 106.102	Version No./Date: 11/15/1996
PBR No.: 106.472	Version No./Date: 03/14/1997
PBR No.: 106.473	Version No./Date: 03/14/1997
PBR No.: 106.227	Version No./Date: 03/14/1997
PBR No.: 106.263	Version No./Date: 11/01/2001
PBR No.: 106.265	Version No./Date: 03/14/1997
PBR No.: 106.371	Version No./Date: 03/14/1997
PBR No.: 106.454	Version No./Date: 03/14/1997
PBR No.: 106.511	Version No./Date: 03/14/1997
PBR No.: 106.532	Version No./Date: 03/14/1997
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
PBR No.:	Version No./Date:
♦ **J. Municipal Solid Waste and Industrial Hazardous Waste Permits With an Air Addendum**	
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:
Permit No.:	Issuance Date:

Applicable Requirements Summary
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Table 1a: Additions

Date: May 2023	**Regulated Entity No.:** RN100220847	**Permit No.:** O1119
Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA	**Area Name:** Maryneal Cement Plant	

Revision No.	Unit/Group/Process ID No.	Unit/Group/Process Applicable Form	SOP/GOP Index No	Pollutant	Applicable Regulatory Requirement Name	Applicable Regulatory Requirement Standard(s)
1	S-C-85	OP-UA33	63LLL	PM (Opacity)	MACT LLL	§63.1345
1	S-C-86	OP-UA33	63LLL	PM (Opacity)	MACT LLL	§63.1345
1	S-C-87	OP-UA33	63LLL	PM (Opacity)	MACT LLL	§63.1345
2	GRPSILO23	OP-UA33	63LLL	PM (Opacity)	MACT LLL	§63.1345

Applicable Requirements Summary
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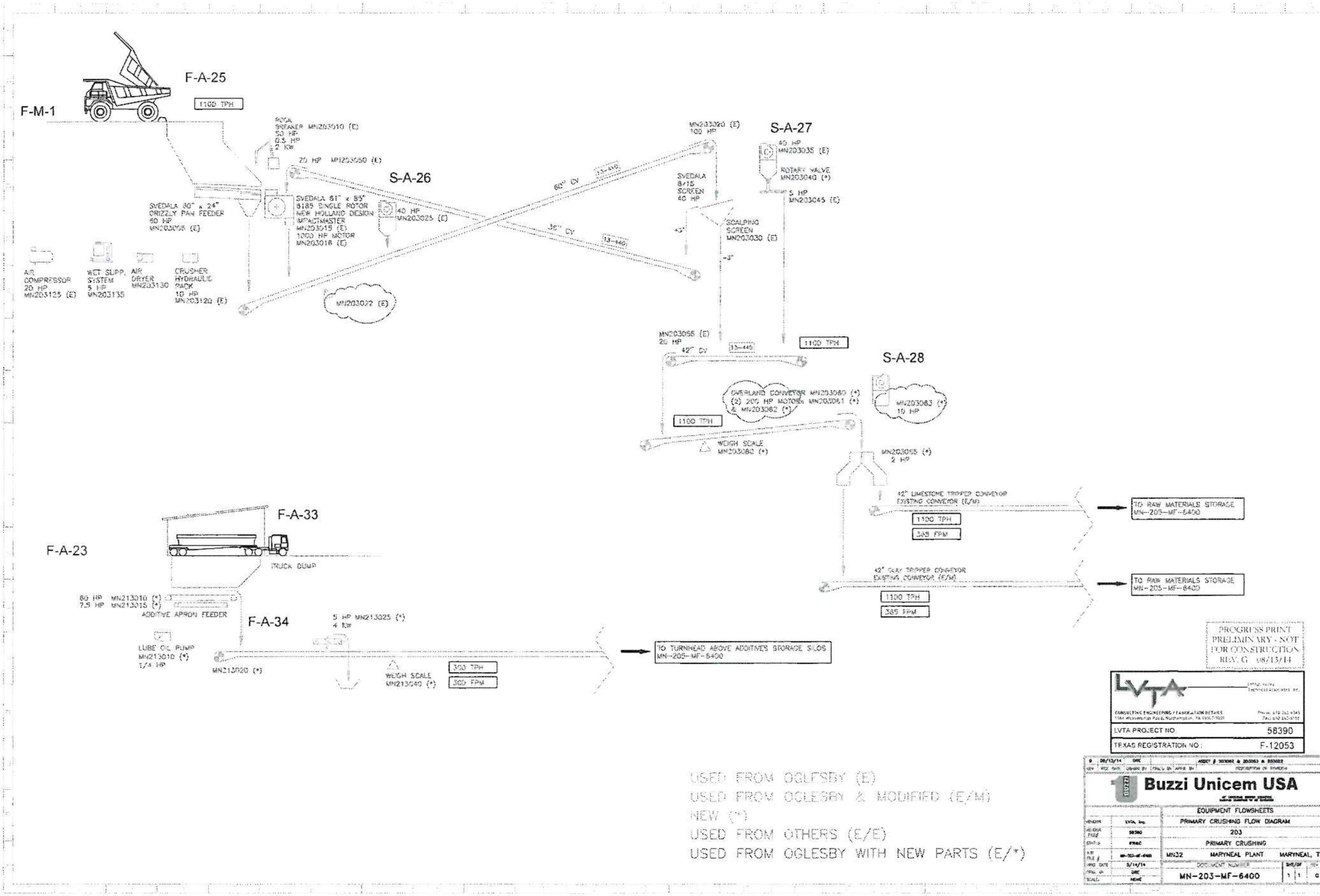
Table 1b: Additions

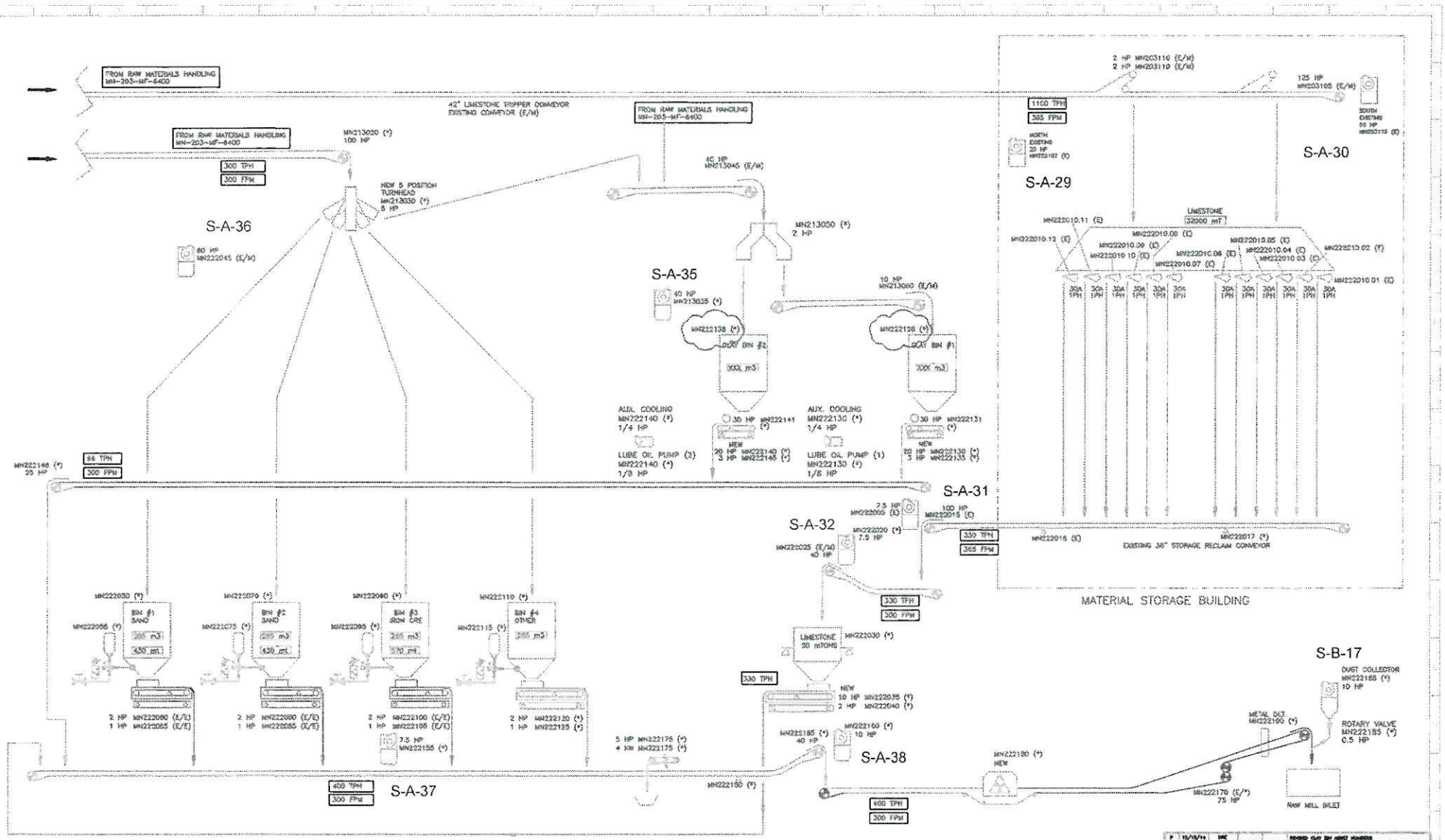
Date: May 2023	**Regulated Entity No.:** RN100220847	**Permit No.:** O1119
Company Name: Lone Star Industries, Inc. dba Buzzi Unicem USA	**Area Name:** Maryneal Cement Plant	

Revision No.	Unit/Group/Process ID No.	SOP/GOP Index No.	Pollutant	Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
1	S-C-85	63LLL	PM (Opacity)	§ 63.1349(a) § 63.1349(b)(2) § 63.1349(e) § 63.1350(a) § 63.1350(f)	§ 63.1355(a) § 63.1355(b) § 63.1355(g) § 63.1355(h)	§ 63.1354(a) § 63.1354(b) § 63.1354(c)
1	S-C-86	63LLL	PM (Opacity)	§ 63.1349(a) § 63.1349(b)(2) § 63.1349(e) § 63.1350(a) § 63.1350(f)	§ 63.1355(a) § 63.1355(b) § 63.1355(g) § 63.1355(h)	§ 63.1354(a) § 63.1354(b) § 63.1354(c)
1	S-C-87	63LLL	PM (Opacity)	§ 63.1349(a) § 63.1349(b)(2) § 63.1349(e) § 63.1350(a) § 63.1350(f)	§ 63.1355(a) § 63.1355(b) § 63.1355(g) § 63.1355(h)	§ 63.1354(a) § 63.1354(b) § 63.1354(c)
2	GRPSILO23	63LLL	PM (Opacity)	§ 63.1349(a) § 63.1349(b)(2) § 63.1349(e) § 63.1350(a) § 63.1350(f)	§ 63.1355(a) § 63.1355(b) § 63.1355(g) § 63.1355(h)	§ 63.1354(a) § 63.1354(b) § 63.1354(c)

APPENDIX A – PLANT PROCESS FLOW DIAGRAMS

Provided as Appendix A are copies of the Plant's current Process Flow Diagrams.


F-M-1
F-A-25
1100 TPH
ROCK BREAKER MN203010 (E)
50 HP
0.5 HP
2 Kw
20 HP MN203050 (E)
S-A-26
SVEDALA 60" x 24" GRIZZLY PAN FEEDER
60 HP
MN203005 (E)
SVEDALA 61" x 85" 6185 SINGLE ROTOR NEW HOLLAND DESIGN IMPACTMASTER
MN203015 (E)
1000 HP MOTOR
MN203016 (E)
40 HP
MN203025 (E)
AIR COMPRESSOR
20 HP
MN203125 (E)
WET SUPP. SYSTEM
5 HP
MN203135
AIR DRYER
MN203130
CRUSHER HYDRAULIC PACK
10 HP
MN203120 (E)
MN203022 (E)
60" CV
36" CV
13-440
MN203020 (E)
100 HP
S-A-27
40 HP
MN203035 (E)
ROTARY VALVE
MN203040 (*)
5 HP
MN203045 (E)
SVEDALA 8/16 SCREEN
40 HP
+3"
-3"
SCALPING SCREEN
MN203030 (E)
MN203055 (E)
20 HP
42" CV
13-440
1100 TPH
S-A-28
OVERLAND CONVEYOR MN203060 (*)
(2) 200 HP MOTORS MN203061 (*)
& MN203062 (*)
MN203063 (*)
10 HP
1100 TPH
WEIGH SCALE
MN203080 (*)
MN203065 (*)
2 HP
42" LIMESTONE TRIPPER CONVEYOR
EXISTING CONVEYOR (E/M)
1100 TPH
385 FPM
TO RAW MATERIALS STORAGE
MN-205-MF-6400
42" CLAY TRIPPER CONVEYOR
EXISTING CONVEYOR (E/M)
1100 TPH
385 FPM
TO RAW MATERIALS STORAGE
MN-205-MF-6400
F-A-33
F-A-23
TRUCK DUMP
60 HP MN213010 (*)
7.5 HP MN213015 (*)
ADDITIVE APRON FEEDER
F-A-34
5 HP MN213025 (*)
4 Kw
LUBE OIL PUMP
MN213010 (*)
1/4 HP
MN213020 (*)
WEIGH SCALE
MN213040 (*)
300 TPH
300 FPM
TO TURNHEAD ABOVE ADDITIVES STORAGE SILOS
MN-205-MF-6400
PROGRESS PRINT
PRELIMINARY - NOT FOR CONSTRUCTION
REV. G 08/13/14
LVTA
CONSULTING ENGINEERING / FABRICATION DETAILS
LVTA PROJECT NO. 58390
TEXAS REGISTRATION NO.: F-12053
USED FROM OGLESBY (E)
USED FROM OGLESBY & MODIFIED (E/M)
NEW (*)
USED FROM OTHERS (E/E)
USED FROM OGLESBY WITH NEW PARTS (E/*)
Buzzi Unicem USA
EQUIPMENT FLOWSHEETS
PRIMARY CRUSHING FLOW DIAGRAM
203
PRIMARY CRUSHING
MN32 MARYNEAL PLANT MARYNEAL, TX
MN-203-MF-6400
LVTA, Inc.
58390
5/14/14



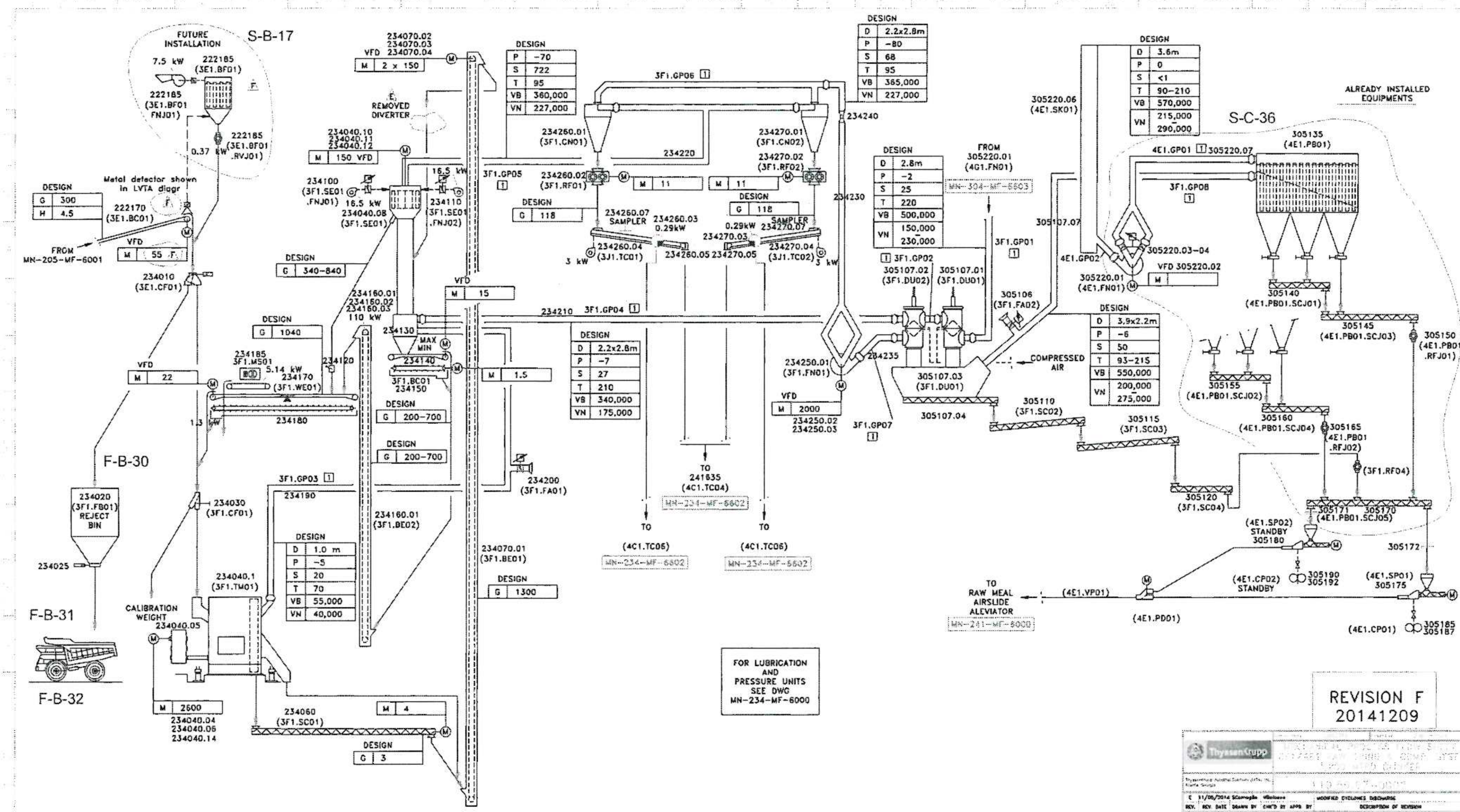
USED FROM OGLESBY (E)
USED FROM OGLESBY & MODIFIED (E/M)
NEW (*)
USED FROM OTHERS (E/E)
USED FROM OGLESBY WITH NEW PARTS (E/*)

PROGRESS PRINT
PRELIMINARY - NOT FOR CONSTRUCTION
REV. P 12/12/14

LVTA
CONSULTING ENGINEERING / FABRICATION DETAILS
LVTA PROJECT NO: 58390
TEXAS REGISTRATION NO.: F-12053

Buzzi Unicem USA

EQUIPMENT FLOWSHEET
LIMEST. & ADDIT. CRUSHING & HANDLING
205
RAW MATERIAL/ADDITIVES
MN32 MARYNEAL PLANT MARYNEAL, TX
MN-222-MF-6400



REVISION F
20141209

24 APRIL 2014

CERTIFIED
THIS DRAWING IS CORRECT FOR EQUIPMENT INSTALLATION

1. ALL EQUIPMENT ON THIS FLOW SHEET IS SUPPLIED BY OTHERS EXCEPT AS NOTED
2. FOR PROCESS DATA LEGEND SEE DRAWING MN-PF-6600

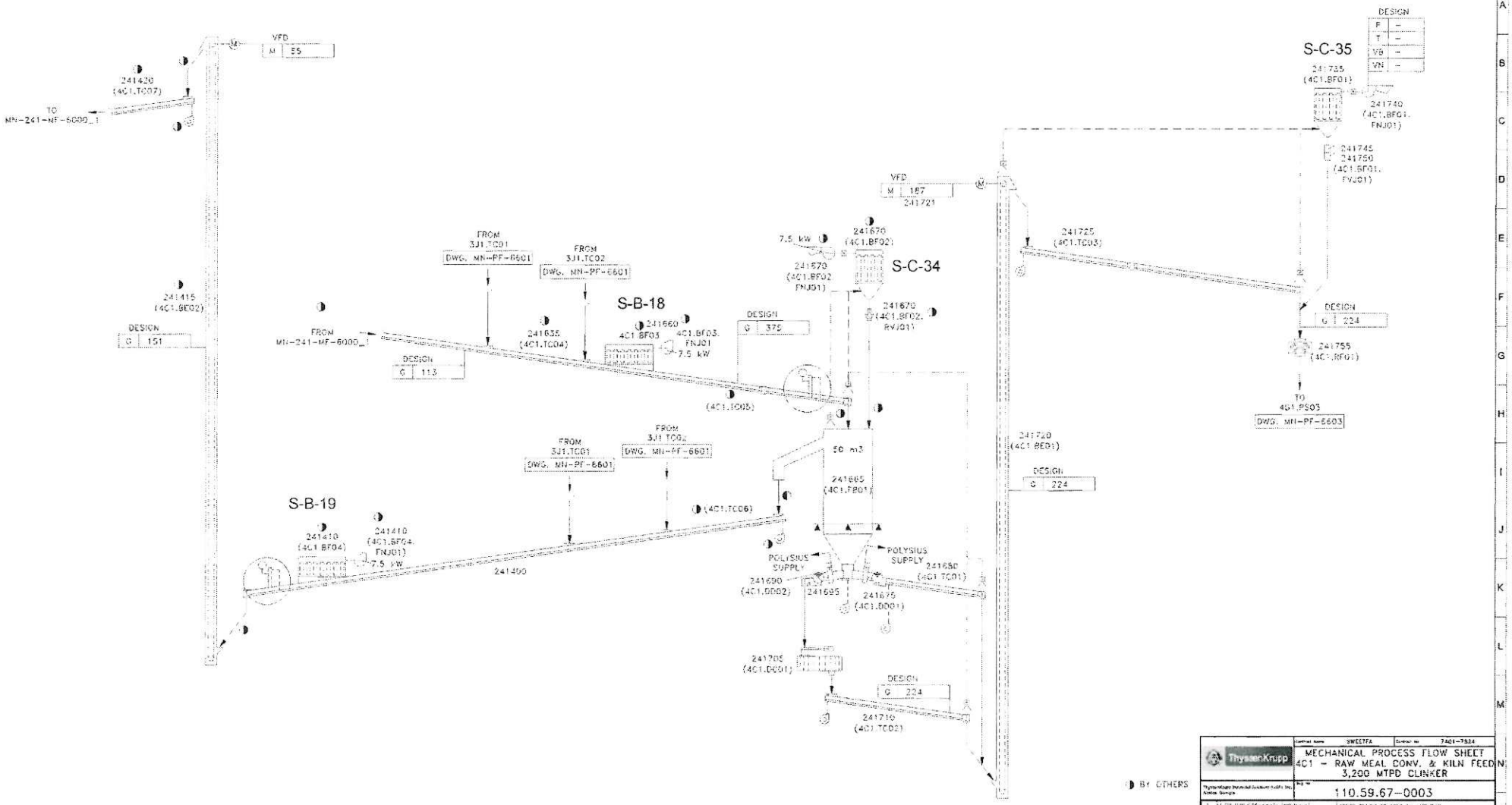
ThyssenKrupp

E 11/05/2014 SCarruglio VBelisario MODIFIED CYCLONES DISCHARGE

REV. REV. DATE DRAWN BY CHK'D BY APPR BY DESCRIPTION OF REVISION

Buzzi Unicem USA

MECHANICAL FLOWSHEETS – EQUIPMENT
Raw Mill dept
234
Raw Mill System #4
MN 3200 MARYNEAL PLANT MARYNEAL, TX.
DOCUMENT NUMBER
MN-234-MF-6601
SHT/OF 1 1 REV E



24 APRIL 2014

APPROVED
THIS DRAWING IS
CORRECT FOR
EQUIPMENT INSTALLATION

ThyssenKrupp

MECHANICAL PROCESS FLOW SHEET
4C1 – RAW MEAL CONV. & KILN FEED
3,200 MTPD CLINKER

110.59.67–0003

Buzzi Unicem USA

MECHANICAL FLOWSHEETS – EQUIPMENT

Raw meal feeding to PT

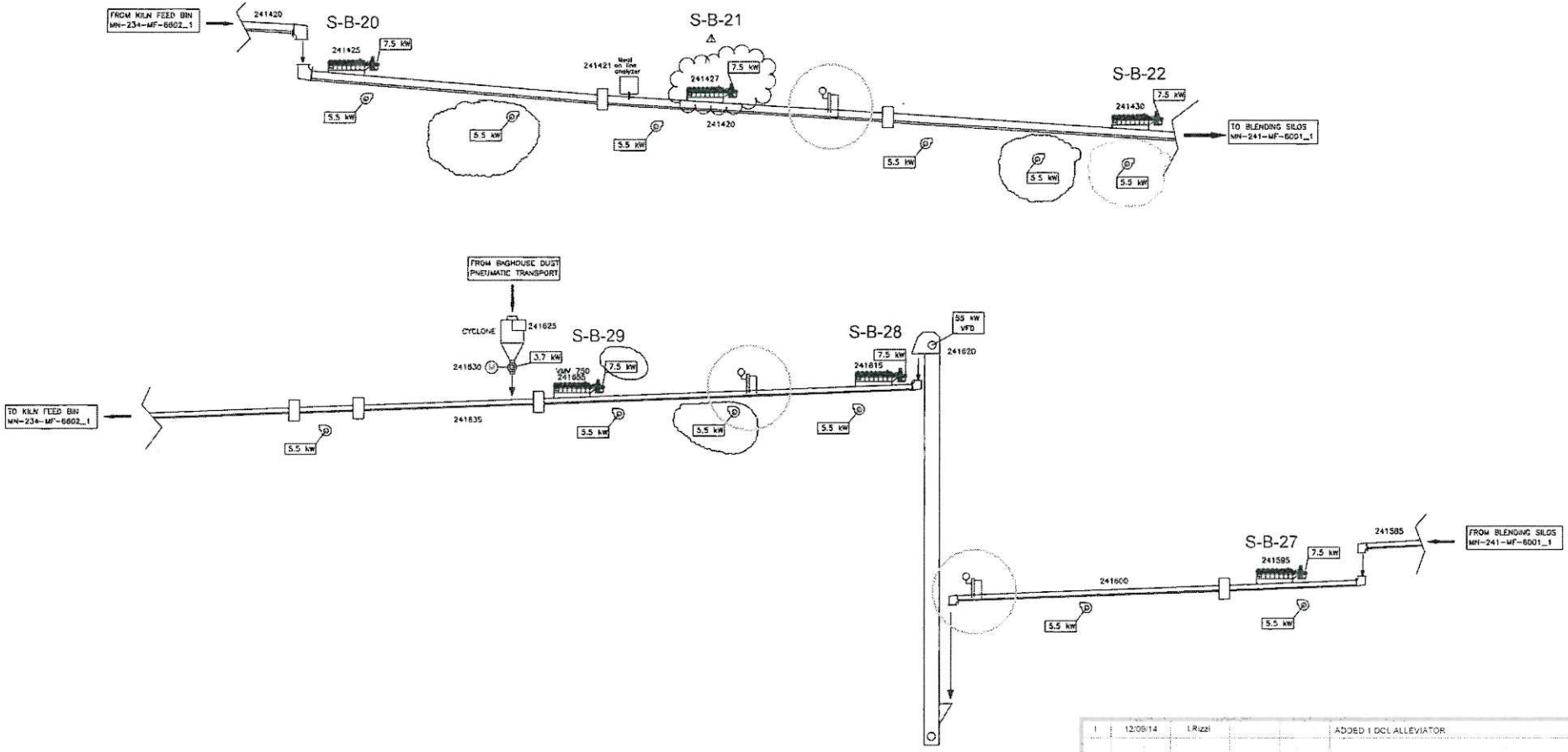
234

Raw Mill System #4

MN 3200 MARYNEAL PLANT MARYNEAL, TX.

DOCUMENT NUMBER

MN-234-MF-6602

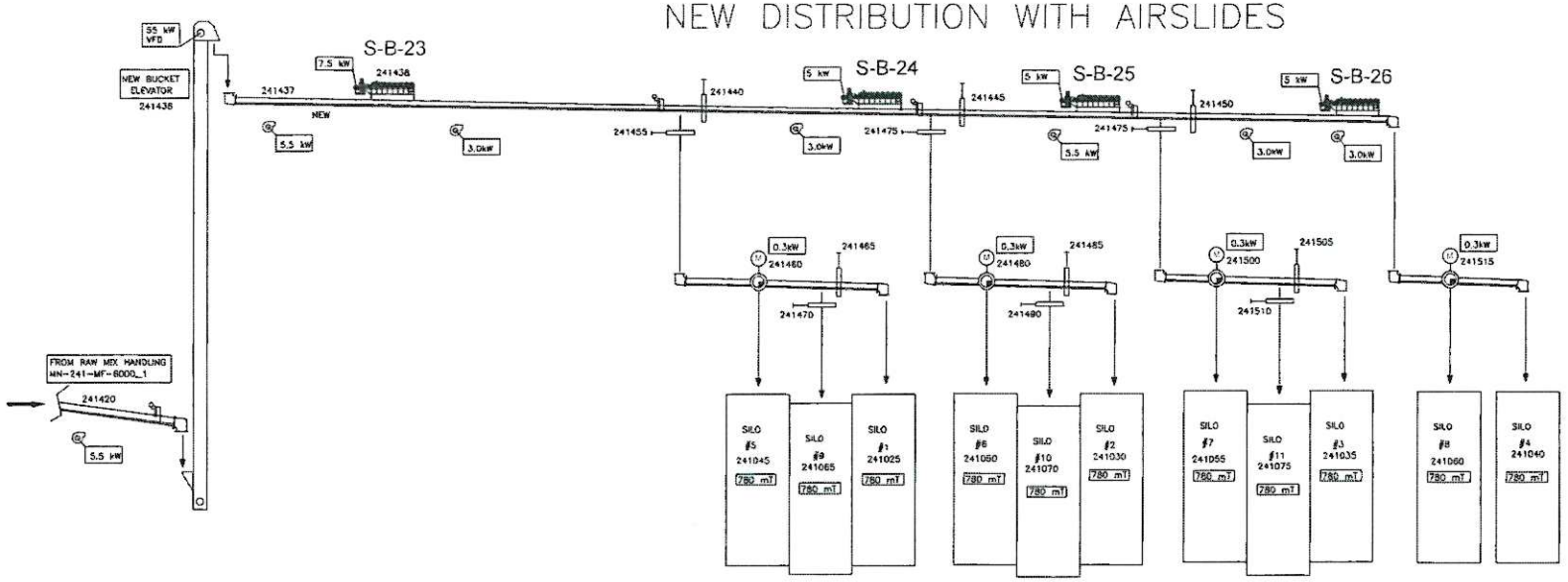


1	12/09/14	LRizzi		ADDED 1 DCL ALLEVIATOR

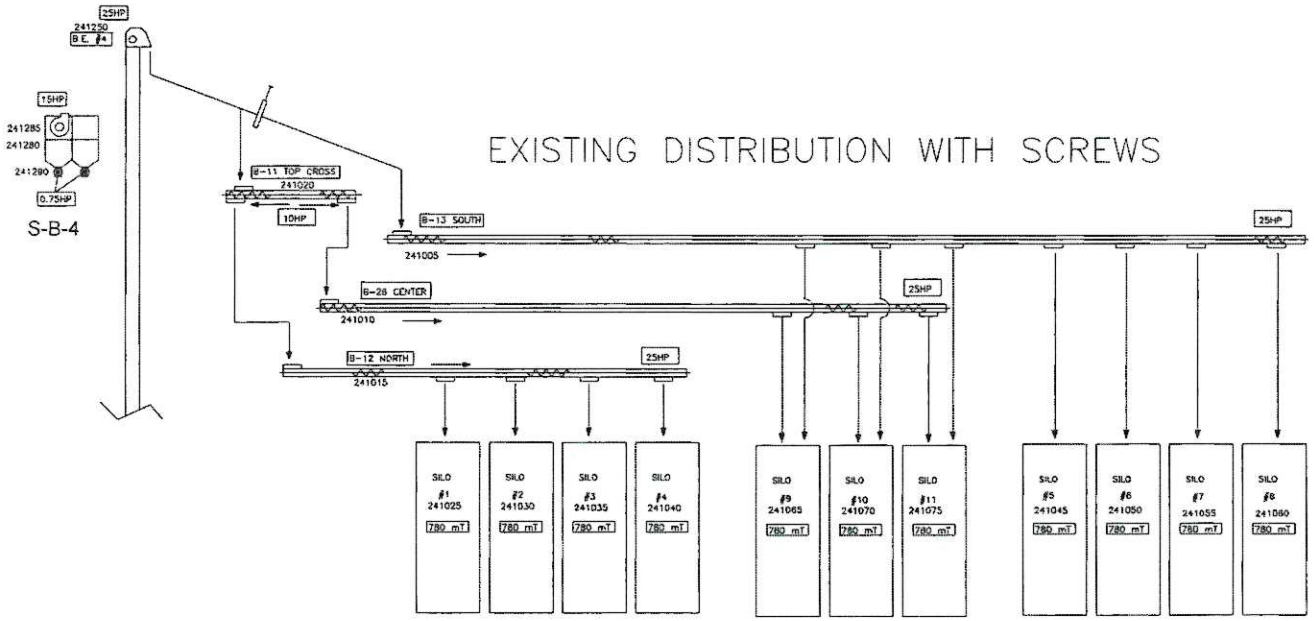
Buzzi Unicem USA

		MECHANICAL FLOWSHEETS - EQUIPMENT
	Buzzi Unicem Italy	RAW MIX HANDLING - FLOWSHEET
	MN-241-MF-6000	241
	ENG	Blending and Raw Mix Storage
	MN-241-MF-6000	MN 3200 MARYNEAL PLANT MARYNEAL, TX
	04/01/2014	SHT/OF
	SComeglio	MN-241-MF-6000 1 1 1
	1:1	

NEW DISTRIBUTION WITH AIRSLIDES



EXISTING DISTRIBUTION WITH SCREWS



Buzzi Unicem USA

MECHANICAL FLOWSHEETS - EQUIPMENT

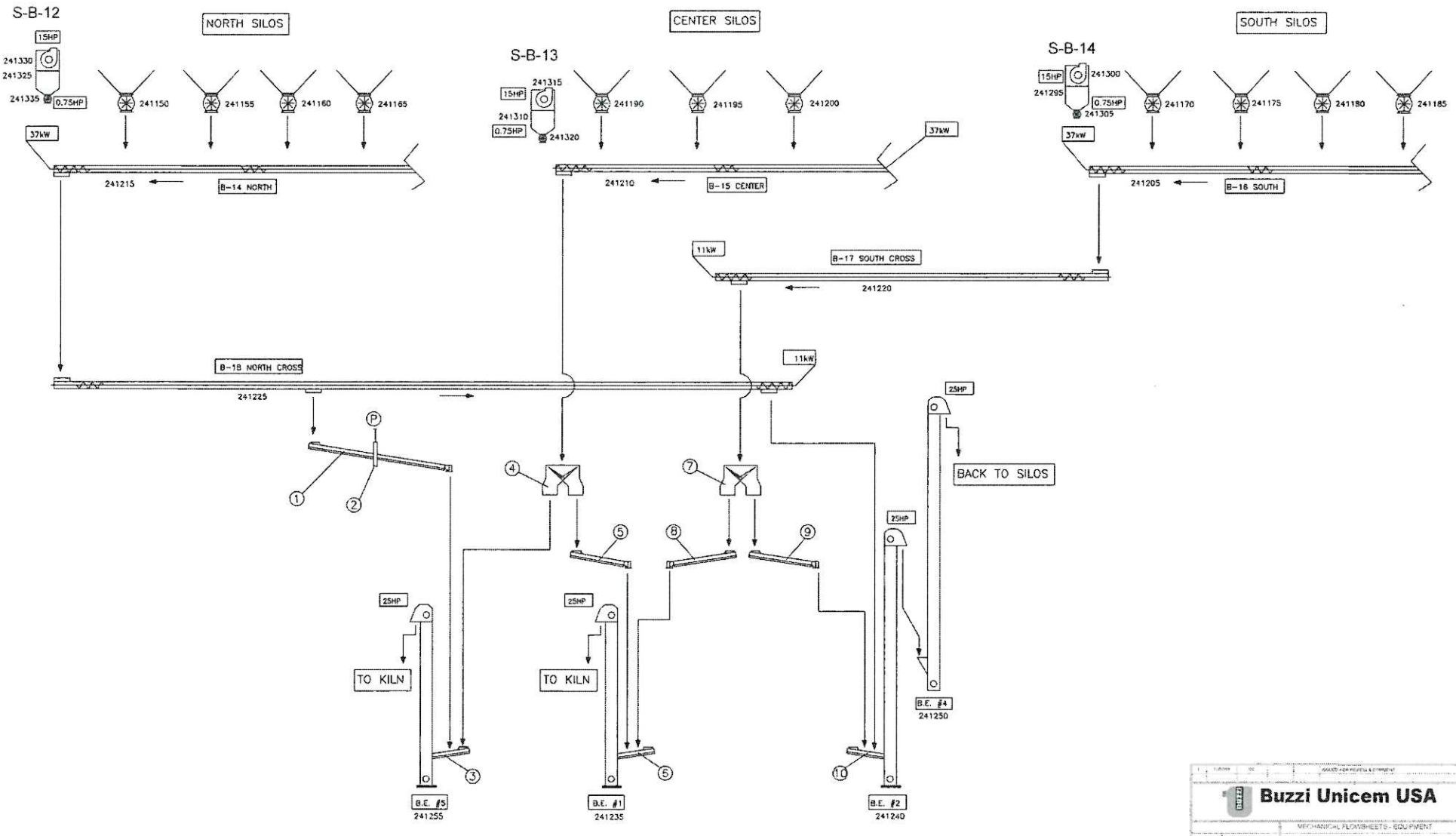
ELEVATORS SILOS FEEDING - FLOWSHEET

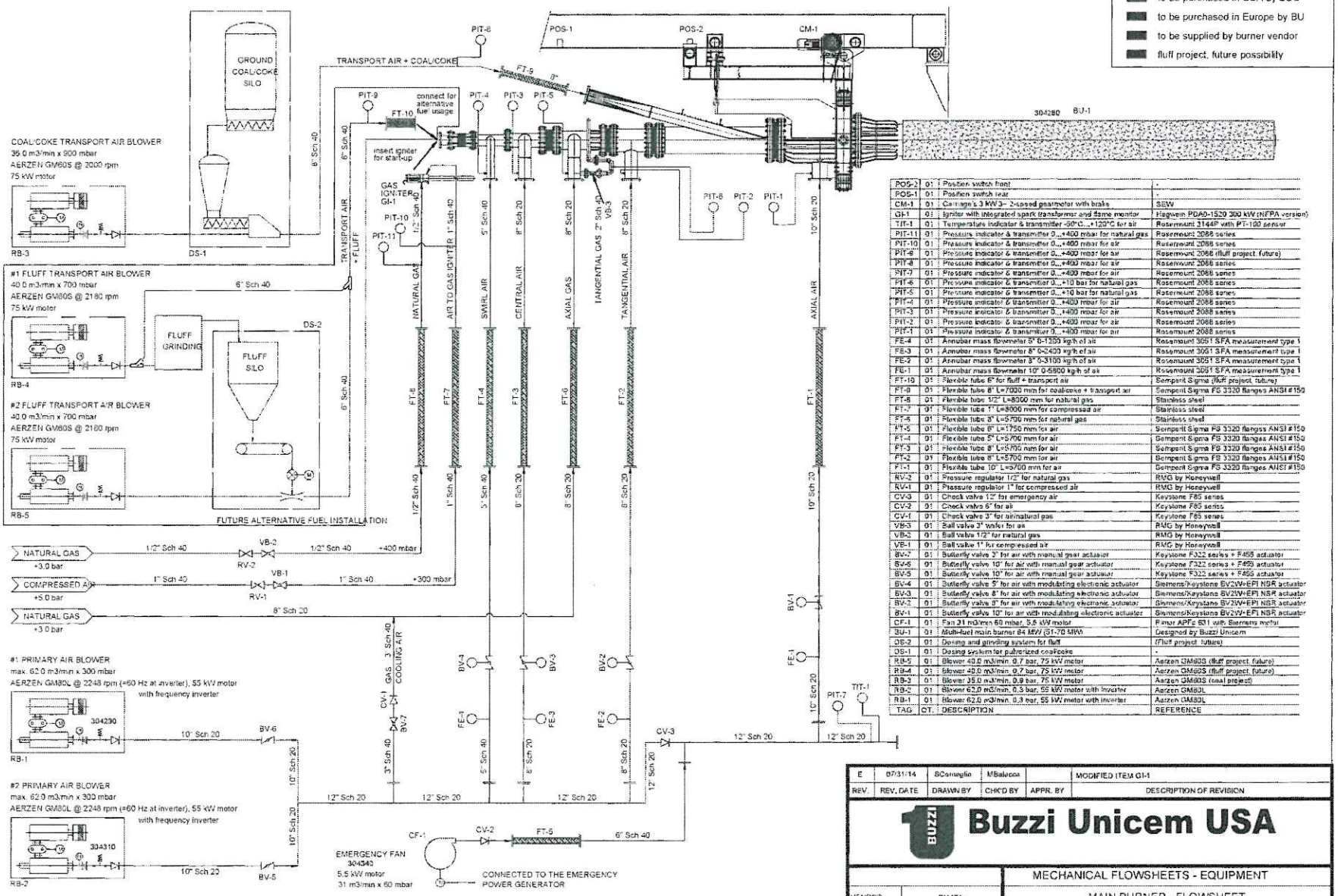
241

Blending and Raw Mix Storage

MN 3200 MARYNEAL PLANT MARYNEAL, TX

MN-241-MF-6001


S-B-12
NORTH SILOS
15HP
241330
241325
241335
0.75HP
241150
241155
241160
241165
37kW
241215
B-14 NORTH
S-B-13
CENTER SILOS
241315
15HP
241310
0.75HP
241320
241190
241195
241200
37kW
241210
B-15 CENTER
S-B-14
SOUTH SILOS
15HP
241300
241295
0.75HP
241305
241170
241175
241180
241185
37kW
241205
B-16 SOUTH
11kW
B-17 SOUTH CROSS
241220
B-18 NORTH CROSS
241225
11kW
25HP
BACK TO SILOS
TO KILN
TO KILN
B.E. #4
241250
B.E. #5
241255
B.E. #1
241235
B.E. #2
241240
Buzzi Unicem USA
MECHANICAL FLOWSHEETS - EQUIPMENT
ELEVATED CIRCUIT PRECALCINER - FLOWSHEET
241
Blending and Raw Mix Storage
MN 3200
MARYNEAL PLANT
MARYNEAL, TX
MN-241-MF-6001



TAG	QT.	DESCRIPTION	REFERENCE
POS-2	01	Position switch front	-
POS-1	01	Position switch rear	-
CM-1	01	Carriage's 3 kW 3~ 2-speed gearmotor with brake	SEW
GI-1	01	Igniter with integrated spark transformer and flame monitor	Hagwein PDA0-1520 300 kW (NFPA version)
TIT-1	01	Temperature indicator & transmitter -50°C...+120°C for air	Rosemount 3144P with PT-100 sensor
PIT-11	01	Pressure indicator & transmitter 0...+400 mbar for natural gas	Rosemount 2088 series
PIT-10	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-9	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 (fluff project, future)
PIT-8	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-7	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-6	01	Pressure indicator & transmitter 0...+10 bar for natural gas	Rosemount 2088 series
PIT-5	01	Pressure indicator & transmitter 0...+10 bar for natural gas	Rosemount 2088 series
PIT-4	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-3	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-2	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-1	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
FE-4	01	Annubar mass flowmeter 5" 0-1200 kg/h of air	Rosemount 3051 SFA measurement type 1
FE-3	01	Annubar mass flowmeter 8" 0-2400 kg/h of air	Rosemount 3051 SFA measurement type 1
FE-2	01	Annubar mass flowmeter 8" 0-3100 kg/h of air	Rosemount 3051 SFA measurement type 1
FE-1	01	Annubar mass flowmeter 10" 0-5800 kg/h of air	Rosemount 3051 SFA measurement type 1
FT-10	01	Flexible tube 6" for fluff + transport air	Sempert Sigma (fluff project, future)
FT-9	01	Flexible tube 8" L=7000 mm for coal/coke + transport air	Sempert Sigma FS 3320 flanges ANSI #150
FT-8	01	Flexible tube 1/2" L=8000 mm for natural gas	Stainless steel
FT-7	01	Flexible tube 1" L=8000 mm for compressed air	Stainless steel
FT-6	01	Flexible tube 8" L=5700 mm for natural gas	Stainless steel
FT-5	01	Flexible tube 6" L=1750 mm for air	Sempert Sigma FS 3320 flanges ANSI #150
FT-4	01	Flexible tube 5" L=5700 mm for air	Sempert Sigma FS 3320 flanges ANSI #150
FT-3	01	Flexible tube 8" L=5700 mm for air	Sempert Sigma FS 3320 flanges ANSI #150
FT-2	01	Flexible tube 8" L=5700 mm for air	Sempert Sigma FS 3320 flanges ANSI #150
FT-1	01	Flexible tube 10" L=5700 mm for air	Sempert Sigma FS 3320 flanges ANSI #150
RV-2	01	Pressure regulator 1/2" for natural gas	RMG by Honeywell
RV-1	01	Pressure regulator 1" for compressed air	RMG by Honeywell
CV-3	01	Check valve 12" for emergency air	Keystone F85 series
CV-2	01	Check valve 6" for air	Keystone F85 series
CV-1	01	Check valve 3" for natural gas	Keystone F85 series
VB-3	01	Ball valve 3" wafer for air	RMG by Honeywell
VB-2	01	Ball valve 1/2" for natural gas	RMG by Honeywell
VB-1	01	Ball valve 1" for compressed air	RMG by Honeywell
BV-7	01	Butterfly valve 3" for air with manual gear actuator	Keystone F322 series + F455 actuator
BV-6	01	Butterfly valve 10" for air with manual gear actuator	Keystone F322 series + F455 actuator
BV-5	01	Butterfly valve 10" for air with manual gear actuator	Keystone F322 series + F455 actuator
BV-4	01	Butterfly valve 5" for air with modulating electronic actuator	Siemens/Keystone BV2W-EPI NSR actuator
BV-3	01	Butterfly valve 8" for air with modulating electronic actuator	Siemens/Keystone BV2W-EPI NSR actuator
BV-2	01	Butterfly valve 8" for air with modulating electronic actuator	Siemens/Keystone BV2W-EPI NSR actuator
BV-1	01	Butterfly valve 10" for air with modulating electronic actuator	Siemens/Keystone BV2W-EPI NSR actuator
CF-1	01	Fan 31 m3/min 60 mbar, 5.5 kW motor	Fimor APFs 631 with Siemens motor
BU-1	01	Multi-fuel main burner 84 MW (51-70 MW)	Designed by Buzzi Unicem
DS-2	01	Dosing and grinding system for fluff	(Fluff project, future)
DS-1	01	Dosing system for pulverized coal/coke	-
RB-5	01	Blower 40.0 m3/min, 0.7 bar, 75 kW motor	Aerzen GM60S (fluff project, future)
RB-4	01	Blower 40.0 m3/min, 0.7 bar, 75 kW motor	Aerzen GM60S (fluff project, future)
RB-3	01	Blower 35.0 m3/min, 0.9 bar, 75 kW motor	Aerzen GM60S (coal project)
RB-2	01	Blower 62.0 m3/min, 0.3 bar, 55 kW motor with inverter	Aerzen GM80L
RB-1	01	Blower 62.0 m3/min, 0.3 bar, 55 kW motor with inverter	Aerzen GM80L

REV.	REV. DATE	DRAWN BY	CHK'D BY	APPR. BY	DESCRIPTION OF REVISION
E	07/31/14	SCornaglia	MBalucca		MODIFIED ITEM GI-1

Buzzi Unicem USA

MECHANICAL FLOWSHEETS - EQUIPMENT

MAIN BURNER - FLOWSHEET

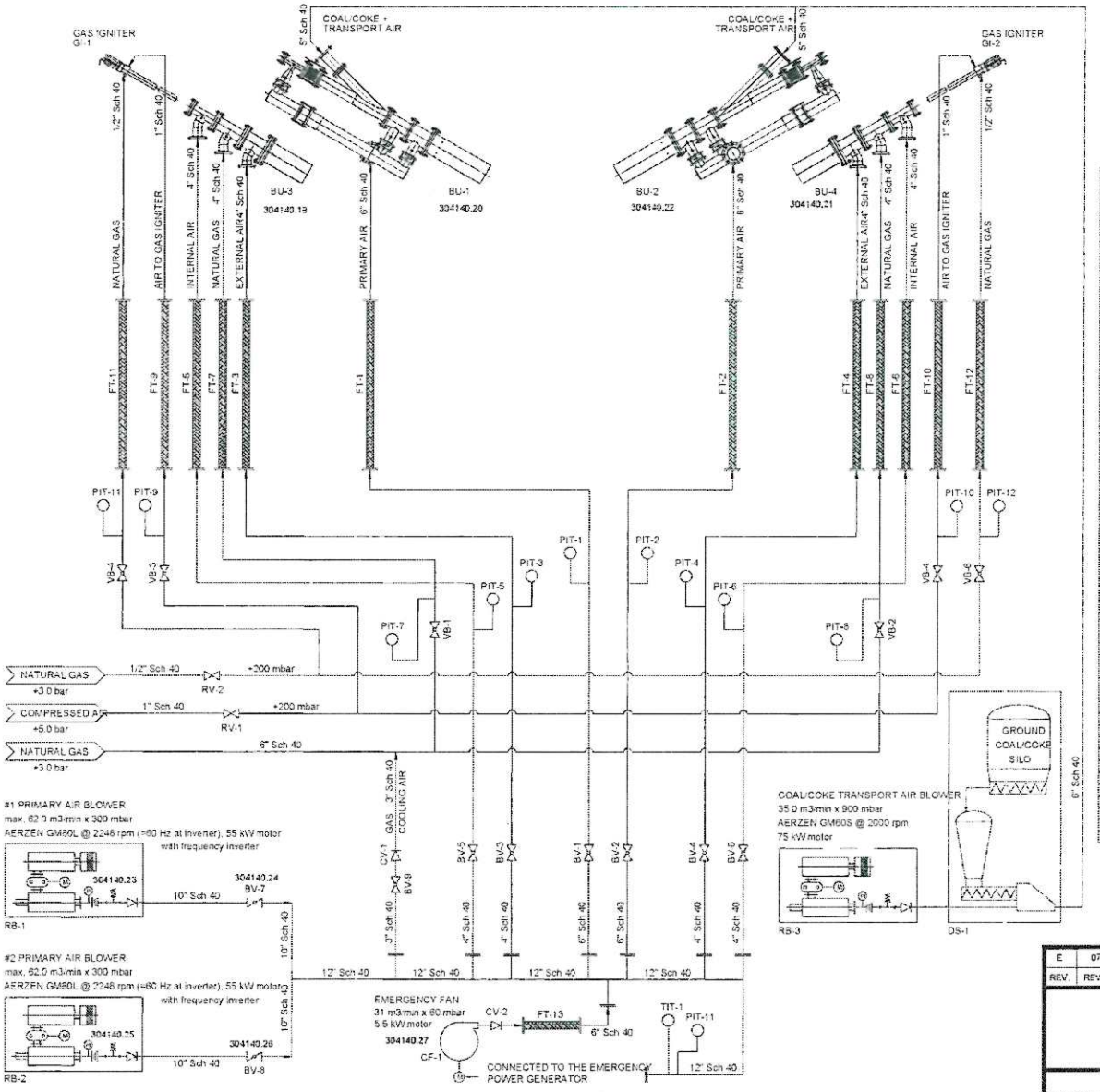
304

Kiln System #4

MN 3200 MARYNEAL PLANT MARYNEAL, TX

VENDOR	BU ITA
VENDOR FILE#	MN-304-MF-6001
STATUS	ENG
B.U. FILE #	MN-304-MF-6001
ORIG. DATE	03/31/2014
ORIG. BY	SCornaglia
SCALE	1:1

DOCUMENT NUMBER	SHT/OF	REV
MN-304-MF-6001	1 1	E



Color code for the list of materials:

- to be purchased in USA by BUU
- to be purchased in Europe by BU
- to be supplied by burner vendor

GI-2	01	Igniter with integrated spark transformer and flame monitor	Hegwein PDAG-16D 300 kW (NFPA version)
GI-1	01	Igniter with integrated spark transformer and flame monitor	Hegwein PDAG-16D 300 kW (NFPA version)
TIT-1	01	Temperature indicator & transmitter -50°C...+120°C for air	Rosemount 3144P with PT-100 sensor
PIT-12	01	Pressure indicator & transmitter 0...+400 mbar for natural gas	Rosemount 2088 series
PIT-11	01	Pressure indicator & transmitter 0...+400 mbar for natural gas	Rosemount 2088 series
PIT-10	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-9	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-8	01	Pressure indicator & transmitter 0...+10 bar for natural gas	Rosemount 2088 series
PIT-7	01	Pressure indicator & transmitter 0...+10 bar for natural gas	Rosemount 2088 series
PIT-6	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-5	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-4	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-3	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-2	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
PIT-1	01	Pressure indicator & transmitter 0...+400 mbar for air	Rosemount 2088 series
FT-13	01	Flexible tube 6" L=1750 mm for air	Sempertk Sigma FS 3320 flanges ANSI #150
FT-12	01	Flexible tube 1/2" L=5000 mm for natural gas	Stainless steel
FT-11	01	Flexible tube 1/2" L=5000 mm for natural gas	Stainless steel
FT-10	01	Flexible tube 1" L=5000 mm for compressed air	Stainless steel
FT-9	01	Flexible tube 1" L=5000 mm for compressed air	Stainless steel
FT-8	01	Flexible tube 4" L=5000 mm for air	Sempert Sigma FS 3320 flanges ANSI #150
FT-7	01	Flexible tube 4" L=5000 mm for air	Sempert Sigma FS 3320 flanges ANSI #150
FT-6	01	Flexible tube 4" L=5000 mm for natural gas	Stainless steel
FT-5	01	Flexible tube 4" L=5000 mm for natural gas	Stainless steel
FT-4	01	Flexible tube 4" L=5000 mm for air	Sempert Sigma FS 3320 flanges ANSI #150
FT-3	01	Flexible tube 4" L=5000 mm for air	Sempert Sigma FS 3320 flanges ANSI #150
FT-2	01	Flexible tube 6" L=5000 mm for air	Sempert Sigma FS 3320 flanges ANSI #150
FT-1	01	Flexible tube 6" L=5000 mm for air	Sempert Sigma FS 3320 flanges ANSI #150
RV-2	01	Pressure regulator 1/2" for natural gas	RMG by Honeywell
RV-1	01	Pressure regulator 1" for compressed air	RMG by Honeywell
CV-2	01	Check valve 6" for air	Keystone F85 series
CV-1	01	Check valve 3" for air/natural gas	Keystone F85 series
VB-6	01	Ball valve 1/2" for natural gas	RMG by Honeywell
VB-5	01	Ball valve 1/2" for natural gas	RMG by Honeywell
VB-4	01	Ball valve 1" for compressed air	RMG by Honeywell
VB-3	01	Ball valve 1" for compressed air	RMG by Honeywell
VB-2	01	Ball valve 4" for natural gas	RMG by Honeywell
VB-1	01	Ball valve 4" for natural gas	RMG by Honeywell
BV-9	01	Butterfly valve 3" for air with manual gear actuator	Keystone F322 series + F455 actuator
BV-8	01	Butterfly valve 10" for air with manual gear actuator	Keystone F322 series + F455 actuator
BV-7	01	Butterfly valve 10" for air with manual gear actuator	Keystone F322 series + F455 actuator
BV-6	01	Butterfly valve 4" for air with manual gear actuator	Keystone F322 series + F455 actuator
BV-5	01	Butterfly valve 4" for air with manual gear actuator	Keystone F322 series + F455 actuator
BV-4	01	Butterfly valve 4" for air with manual gear actuator	Keystone F322 series + F455 actuator
BV-3	01	Butterfly valve 4" for air with manual gear actuator	Keystone F322 series + F455 actuator
BV-2	01	Butterfly valve 6" for air with manual gear actuator	Keystone F322 series + F455 actuator
BV-1	01	Butterfly valve 6" for air with manual gear actuator	Keystone F322 series + F455 actuator
CF-1	01	Fan 31 m3/min 60 mbar, 5.5 kW motor	Rimor AIPFe 631
BU-4	01	Calciner burner on natural gas back side	Designed by Buzzi Unicem
BU-3	01	Calciner burner on natural gas front side	Designed by Buzzi Unicem
BU-2	01	Calciner burner on coal/coke left side	Designed by Buzzi Unicem
BU-1	01	Calciner burner on coal/coke right side	Designed by Buzzi Unicem
DS-1	01	Dosing system for pulverized coal/coke	-
RB-3	01	Blower 35.0 m3/min, 0.9 bar, 75 kW motor	Aerzen GM60S (coal project)
RB-2	01	Blower 62.0 m3/min, 0.3 bar, 55 kW motor with inverter	Aerzen GM80L
RB-1	01	Blower 62.0 m3/min, 0.3 bar, 55 kW motor with inverter	Aerzen GM80L
TAG	QT.	DESCRIPTION	REFERENCE

REV.	REV. DATE	DRAWN BY	CHK'D BY	APPR. BY	DESCRIPTION OF REVISION
E	07/31/14	SComaglio	MBalacco		REVISED ITEMS LIST

Buzzi Unicem USA

VENDOR	BU ITA
VENDOR FILE#	MN-304-MF-6002
STATUS	ENG
B.U. FILE #	MN-304-MF-6002
ORIG. DATE	03/31/2014
ORIG. BY	SComaglio
SCALE	1:1

MECHANICAL FLOWSHEETS - EQUIPMENT

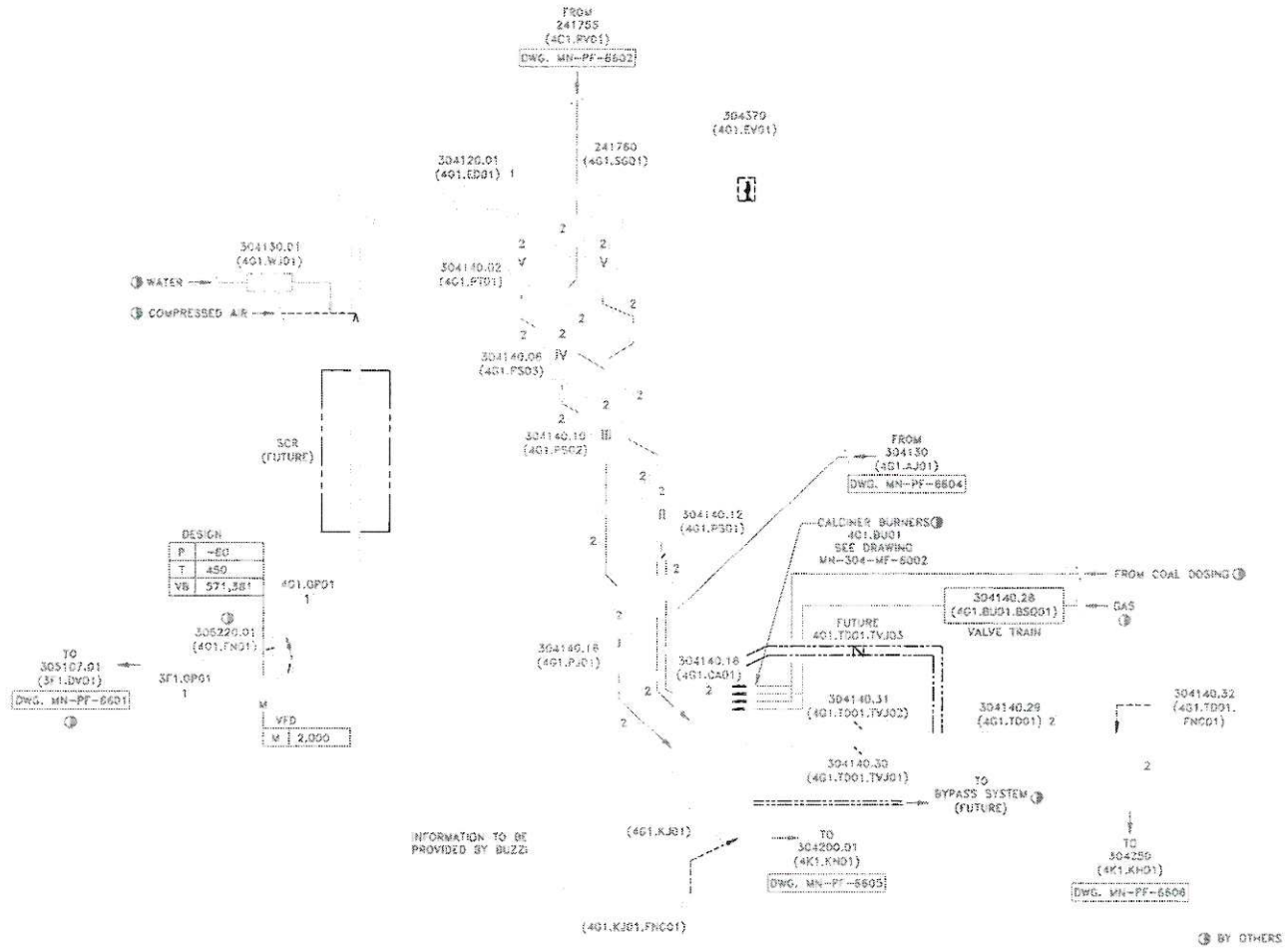
CALCINER BURNER - FLOWSHEET

304

Kiln System #4

MN 3200 MARYNEAL PLANT MARYNEAL, TX

DOCUMENT NUMBER	SHT/OF	REV
MN-304-MF-6002	1 / 1	E



1. FOR PROCESS DATA LEGEND SEE DRAWING MN-PF-6601

ThyssenKrupp

REV.	REV DATE	DRAWN BY	CHK'D BY	APPR BY	DESCRIPTION OF REVISION
0	10/31/2014	LCL	JTJ	RY	REVISED AS NOTED

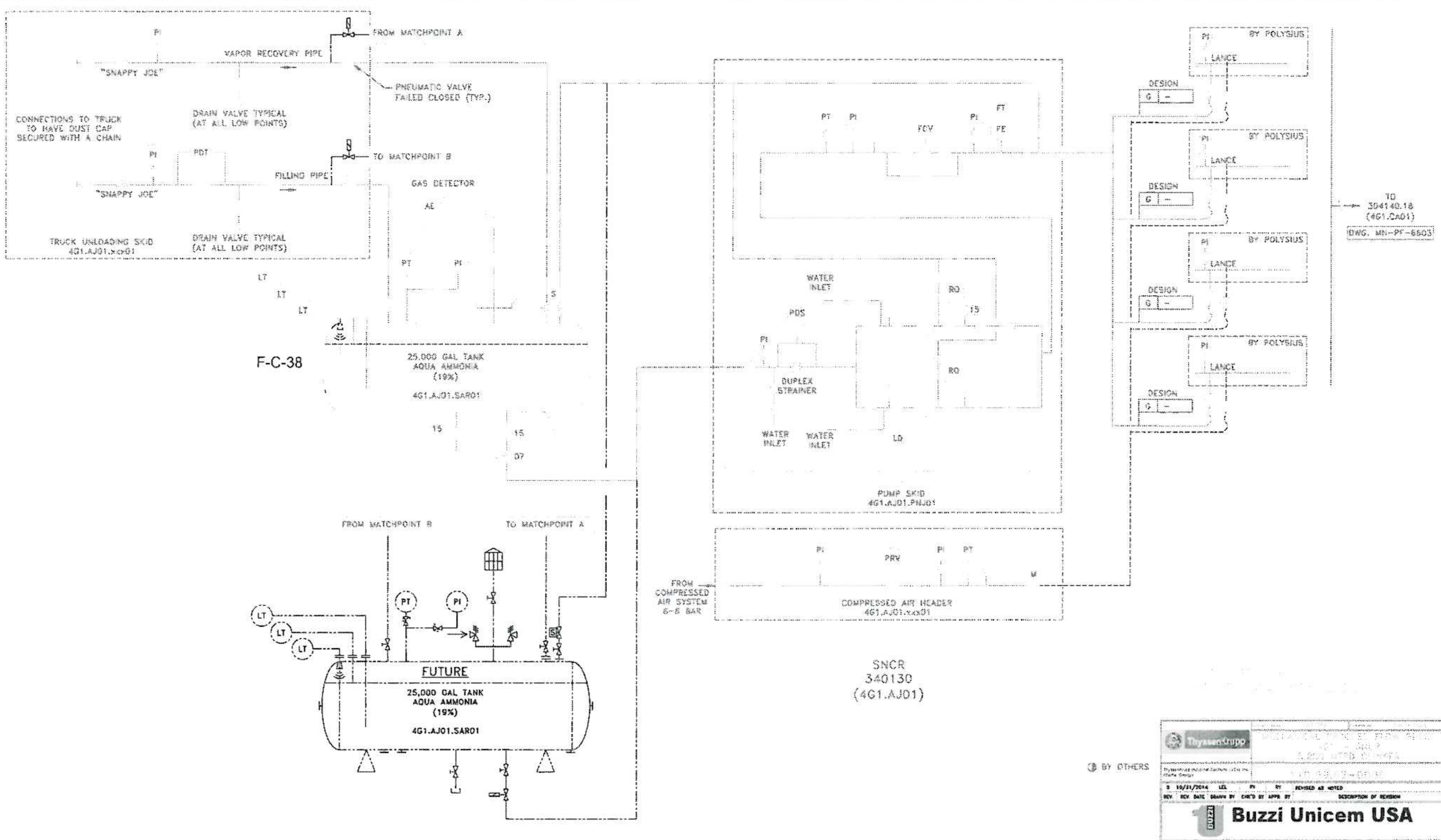
Buzzi Unicem USA

PROCESS – FLOW DIAGRAM

VENDOR	TKSE
VENDOR FILE	870004-0001
STATUS	IFC
B.U. FILE #	MN-PF-6603-01-0
ORIG. DATE	02/20/14
ORIG. BY	LCL
SCALE:	1 : 1

FLOW SHEET
4G1
PREHEATER
MN 3200 MARYNEAL PLANT MARYNEAL, TX.

DOCUMENT NUMBER	SHT/OF	REV
MN-PF-6603	1 1	0



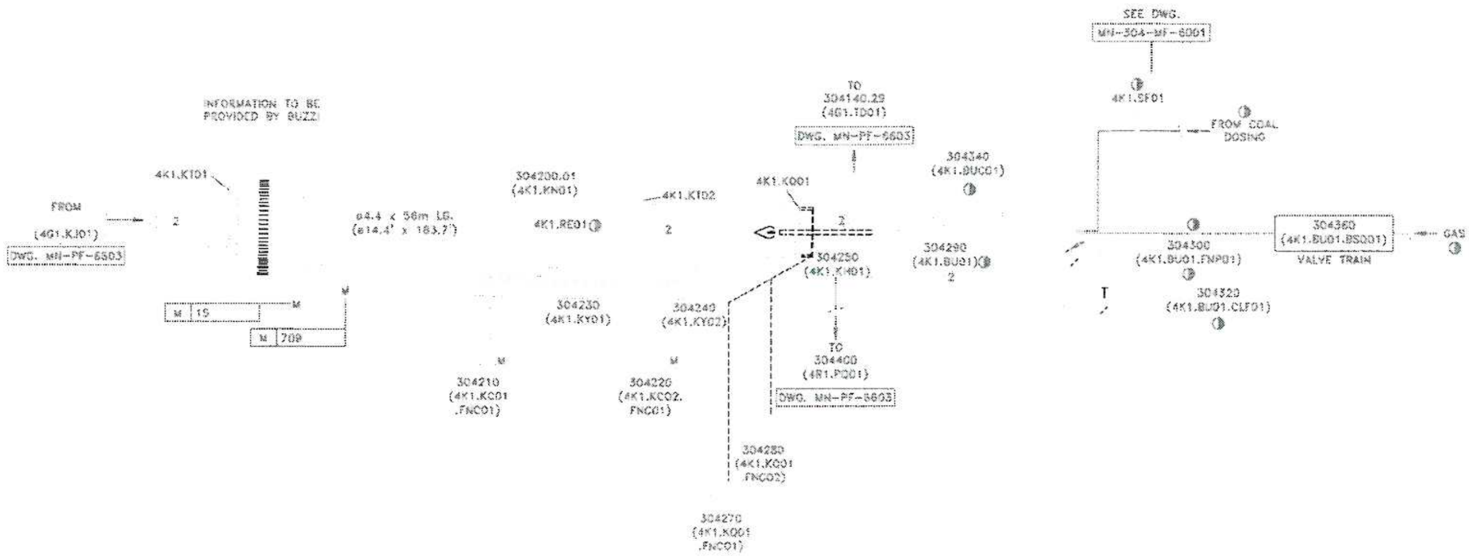
1. FOR PROCESS DATA LEGEND SEE DRAWING MN-PF-6601

ThyssenKrupp

Buzzi Unicem USA

REV.	0
REV. DATE	10/31/2014
DESCRIPTION OF REVISION	REVISED AS NOTED
VENDOR	TKIS
STATUS	IFC
ORIG. DATE	07/20/14
SCALE	1:1

PROCESS – FLOW DIAGRAM
FLOW SHEET
4G1
SNCR
MN 3200 MARYNEAL PLANT MARYNEAL, TX.
DOCUMENT NUMBER: MN-PF-6604
SHT/OF: 1 1 REV: D



BY OTHERS

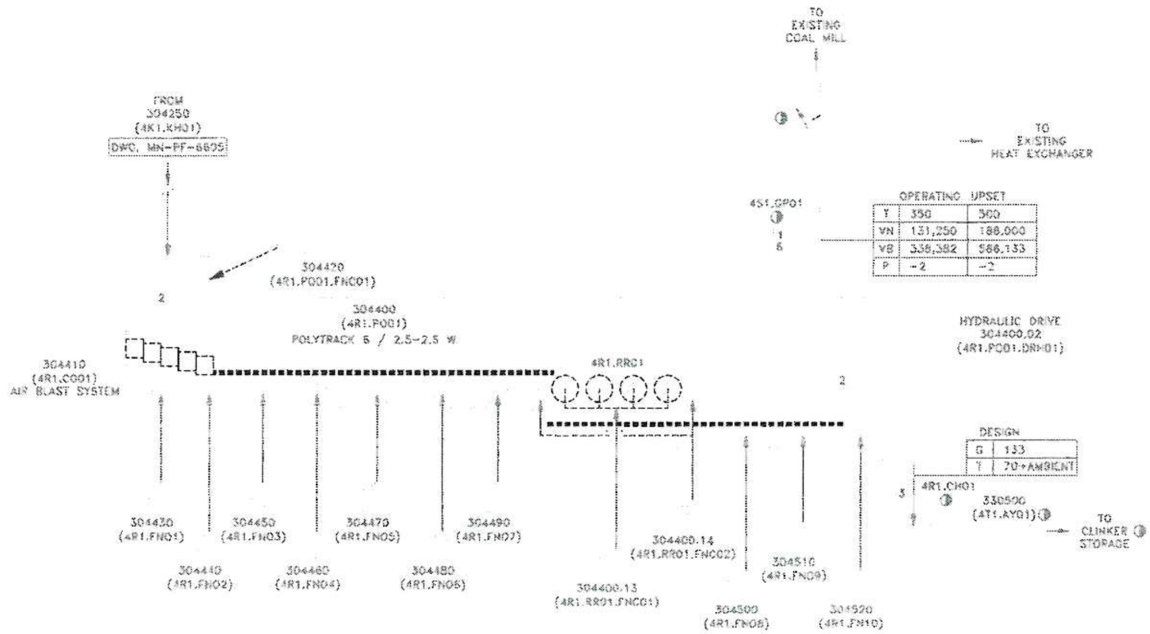
1. FOR PROCESS DATA LEGEND SEE DRAWING MN-PF-6601

ThyssenKrupp

REV.	REV. DATE	DRAWN BY	CHK'D BY	APPR BY	DESCRIPTION OF REVISION
0	10/31/2014	LD.	FI	BY	REVISED AS NOTED

Buzzi Unicem USA

VENDOR	TKIS	PROCESS – FLOW DIAGRAM
VENDOR FILE#	5700060001	FLOW SHEET
STATUS	IFC	4K1
		ROTARY KILN
B.U. FILE #	MN-PF-6605-01-0	MN 3200 MARYNEAL PLANT MARYNEAL, TX.
ORIG. DATE	02/20/14	DOCUMENT NUMBER: MN-PF-6605
ORIG. BY	LEL	SHT/OF: 1 1
SCALE:	1:1	REV: 0



	304430 (4R1.FN01)	304440 (4R1.FN02)	304450 (4R1.FN03)	304460 (4R1.FN04)	304470 (4R1.FN05)	304480 (4R1.FN06)	304490 (4R1.FN07)	304500 (4R1.FN08)	304510 (4R1.FN09)	304420 (4R1.FN10)
P	100	100	100	95	90	85	75	70	65	50
T	30	30	30	30	30	30	30	30	30	30
VB	15,000	24,000	45,000	38,000	37,000	35,000	33,000	35,000	59,000	53,000
VN	12,301	19,681	36,902	31,162	30,342	28,702	27,062	28,702	48,383	43,463
M	--	--	--	--	--	--	--	--	--	--

HOLD

FOR COOLER HYDRAULIC
INFORMATION
SEE TKIS COOLER DRAWING
PO 6100_____ HOLD

1. FOR PROCESS DATA LEGEND SEE DRAWING MN-PF-6600

BY OTHERS

ThyssenKrupp

0 | 10/31/2014 | LEL | RY | RY | REVISED AS NOTED

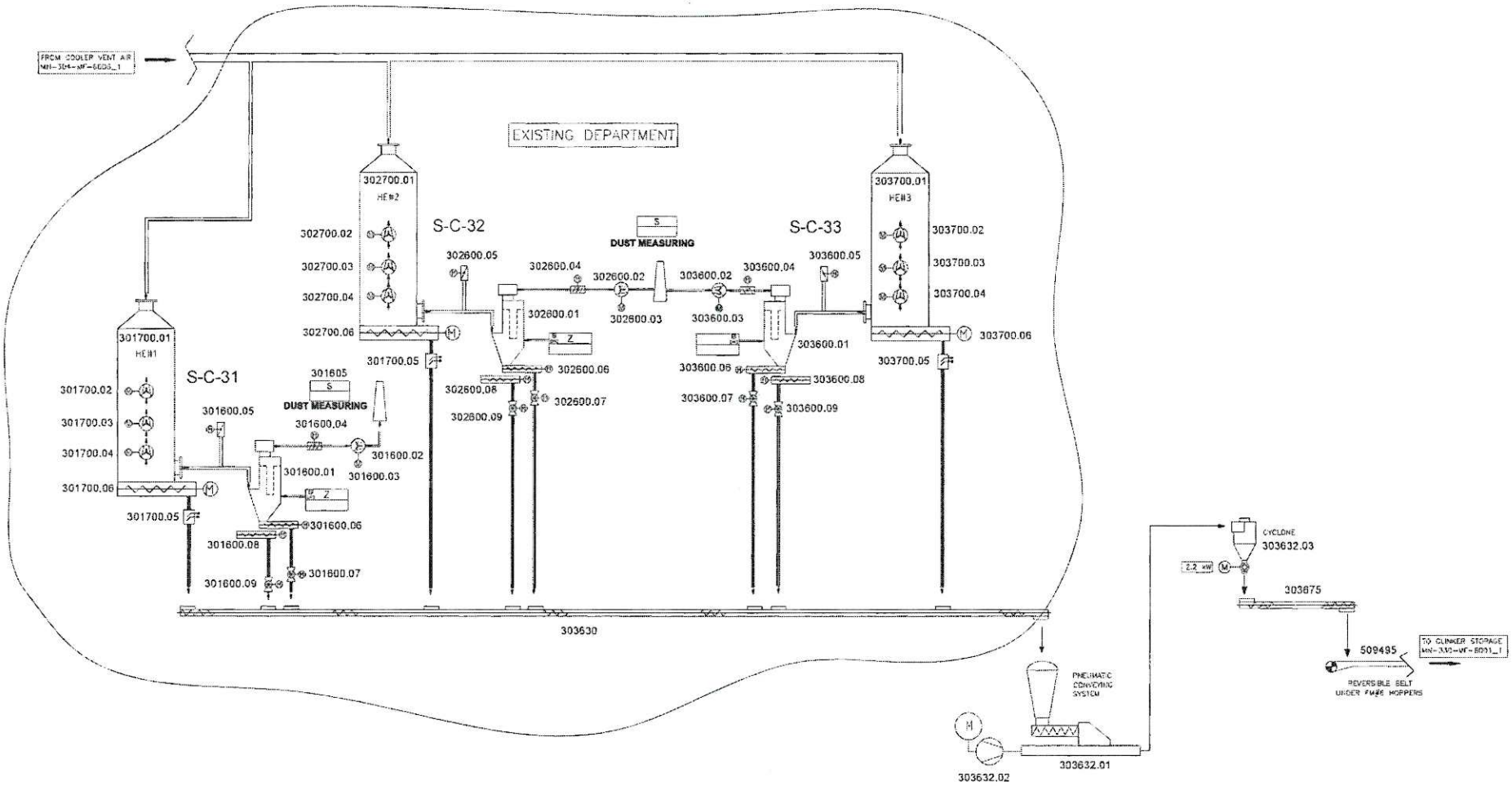
REV. | REV. DATE | DRAWN BY | CHK'D BY | APPR BY | DESCRIPTION OF REVISION

Buzzi Unicem USA

PROCESS – FLOW DIAGRAM
FLOW SHEET
4R1
CLINKER COOLER
MN 3200 MARYNEAL PLANT MARYNEAL, TX.

VENDOR: TKIS
VENDOR FILE #: 8700070001
STATUS: IFC
B.L. FILE #: MN-PF-6606-01-0
ORIG. DATE: 02/20/14
ORIG. BY: LEL
SCALE: 1 : 1

DOCUMENT NUMBER: MN-PF-6606
SHT/OF: 1 1
REV: 0



REV.	REV. DATE	DRAWN BY	CHKD BY	APPR. BY	DESCRIPTION OF REVISION
E	07/03/14	SCarnaglia			NEW ASSET NUMBERS

Buzzi Unicem USA

VENDOR	Buzzi Unicem Italy
VENDOR FILE#	MN-304-MF-6000
STATUS	ENG
B.U. FILE #	MN-304-MF-6000
ORIG. DATE	03/31/2014
ORIG. BY	SCarnaglia
SCALE:	1:1

MECHANICAL FLOWSHEETS - EQUIPMENT

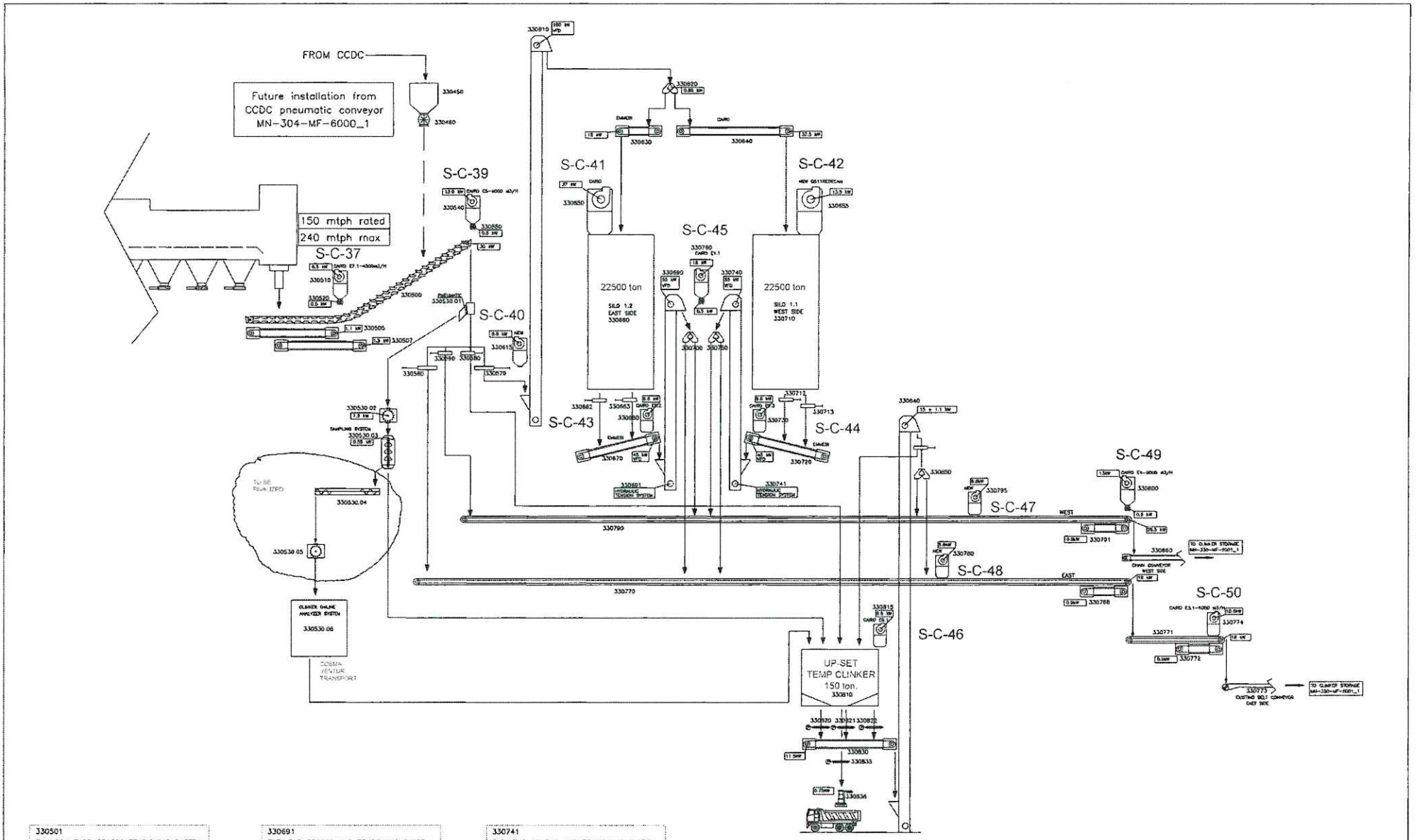
HEAT EXCHANGER & CCDC - FLOWSHEET

304

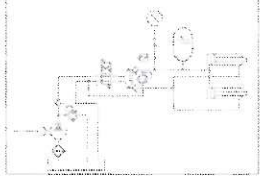
Kiln System #4

MN 3200 MARYNEAL PLANT MARYNEAL, TX

DOCUMENT NUMBER	SHT/OF	REV
MN-304-MF-6000	1 1	E



330501
PAN CONVEYOR 330500 TENSIONING SYSTEM



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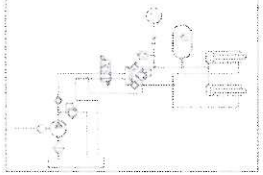
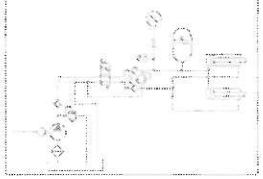
ELEVATOR 330690 HYD TENSIONING SYSTEM



330741
ELEVATOR 330740 HYD TENSIONING SYSTEM

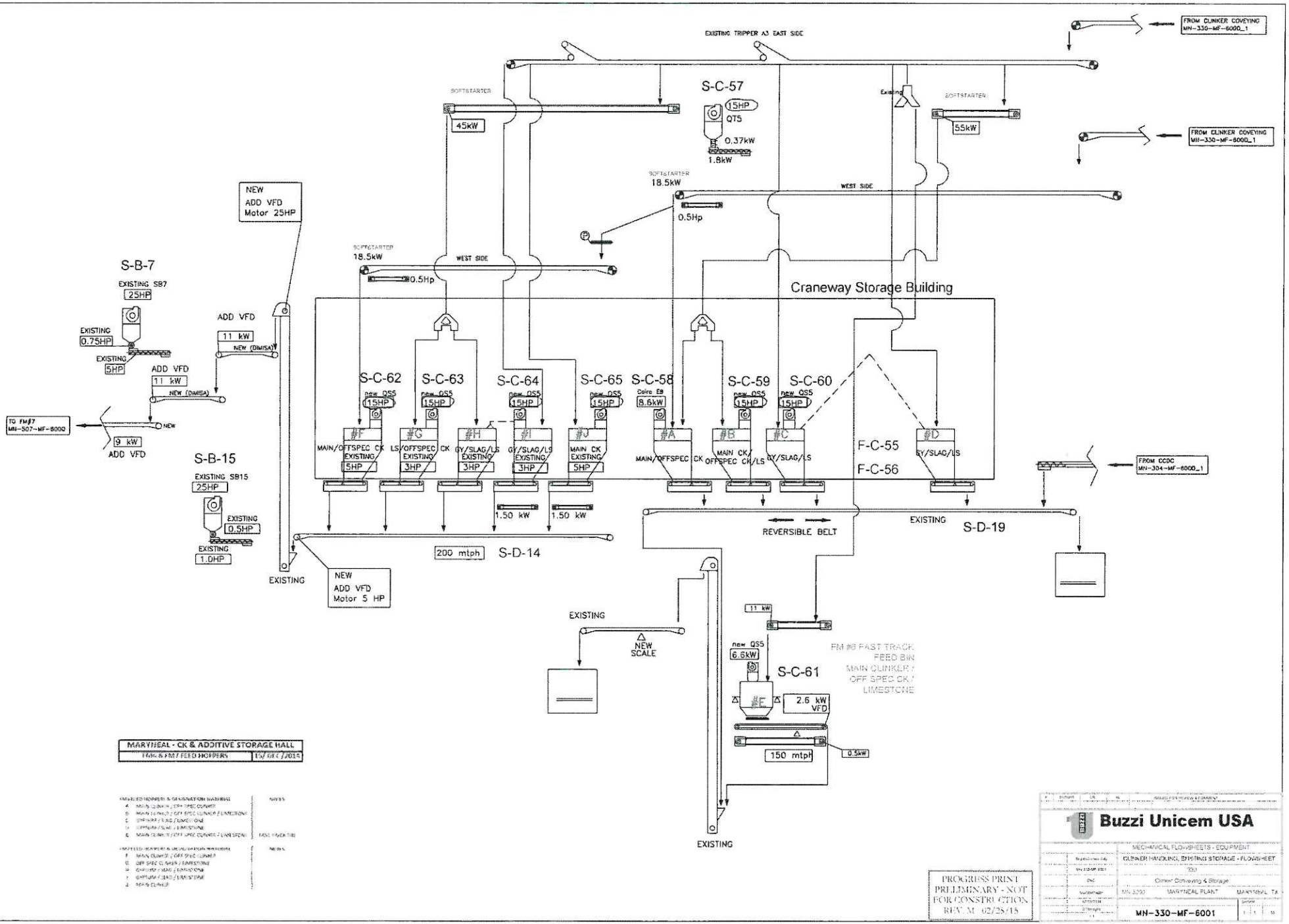


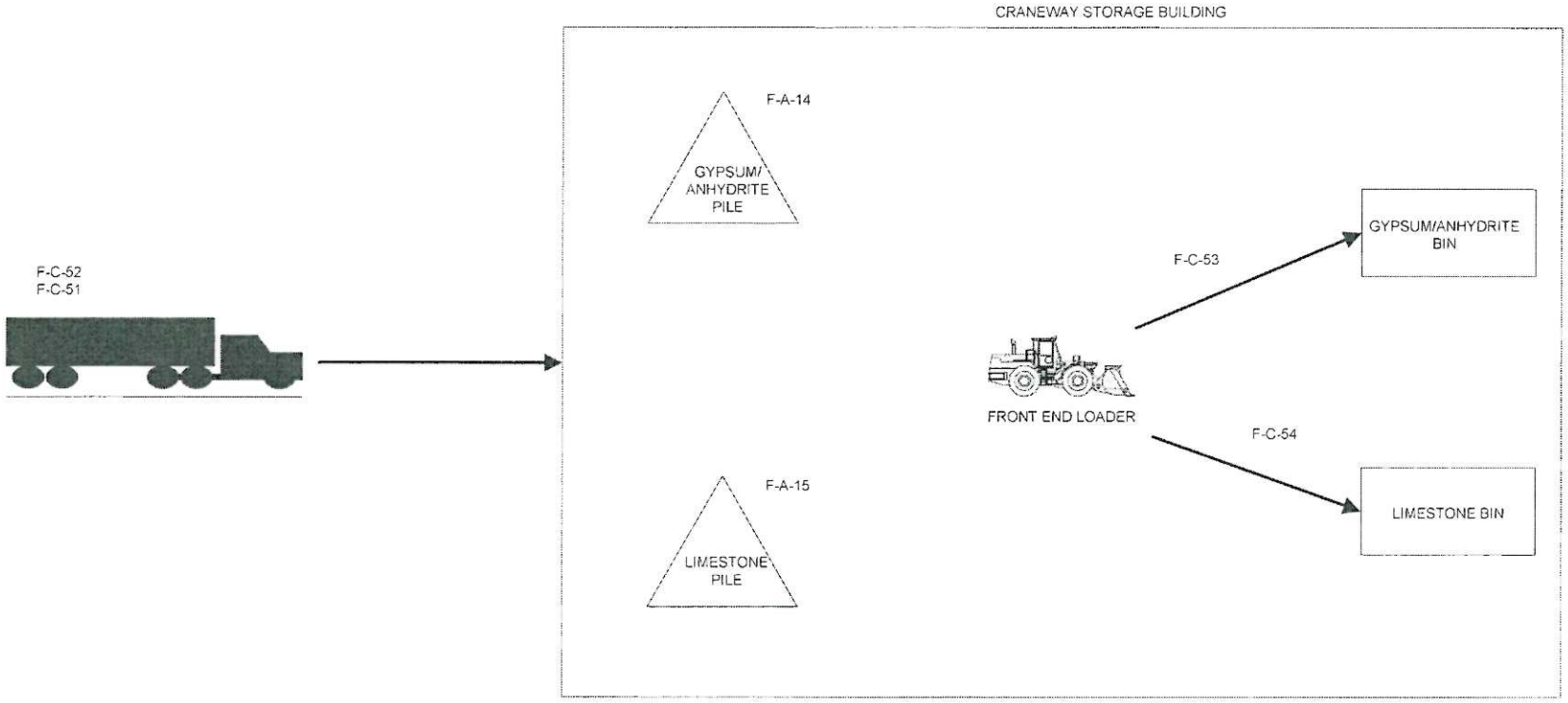
PROGRESS PRINT
PRELIMINARY - NOT FOR CONSTRUCTION
REV. 1 10/30/14

1	10/30/14	LB	AL	ISSUED FOR REVIEW AND COMMENT

Buzzi Unicem USA

MECHANICAL FLOWSHEETS - EQUIPMENT
CLINKER HANDLING TO SILOS - FLOWSHEET
330
CLINKER CONVEYING & STORAGE
MN 3200 MARYNEAL PLANT MARYNEAL, TX
MN-330-MF-6000
1 1 1 1


EXISTING TRIPPER A3 EAST SIDE
FROM CLINKER COVEYING MN-330-MF-6000_1
S-C-57
15HP
QT5
0.37kW
1.8kW
SOFTSTARTER
45kW
Existing
SOFTSTARTER
55kW
FROM CLINKER COVEYING MN-330-MF-6000_1
SOFTSTARTER
18.5kW
0.5Hp
WEST SIDE
NEW
ADD VFD
Motor 25HP
S-B-7
EXISTING SB7
25HP
EXISTING
0.75HP
EXISTING
5HP
ADD VFD
11 kW
NEW (DIMISA)
ADD VFD
11 kW
NEW (DIMISA)
TO FM#7
MN-507-MF-8000
NEW
9 kW
ADD VFD
S-B-15
EXISTING SB15
25HP
EXISTING
0.5HP
EXISTING
1.0HP
EXISTING
NEW
ADD VFD
Motor 5 HP
SOFTSTARTER
18.5kW
0.5Hp
WEST SIDE
Craneway Storage Building
S-C-62
S-C-63
S-C-64
S-C-65
S-C-58
S-C-59
S-C-60
new QS5
15HP
8.6kW
#F
#G
#H
#I
#J
#A
#B
#C
#D
MAIN/OFFSPEC CK EXISTING
5HP
LS/OFFSPEC CK EXISTING
3HP
GY/SLAG/LS EXISTING
3HP
GY/SLAG/LS EXISTING
3HP
MAIN CK EXISTING
5HP
MAIN/OFFSPEC CK
MAIN CK/ OFFSPEC CK/LS
GY/SLAG/LS
F-C-55
F-C-56
GY/SLAG/LS
1.50 kW
1.50 kW
200 mtph
S-D-14
REVERSIBLE BELT
EXISTING
S-D-19
FROM CCDC MN-304-MF-6000_1
EXISTING
NEW SCALE
11 kW
new QS5
6.6kW
S-C-61
#E
2.6 kW VFD
150 mtph
0.5kW
FM #6 FAST TRACK
FEED BIN
MAIN CLINKER /
OFF SPEC CK /
LIMESTONE
EXISTING
MARYNEAL - CK & ADDITIVE STORAGE HALL
TRUCK & RAIL FEED HOPPERS
15/ 01 / 2015
PROGRESS PRINT
PRELIMINARY - NOT
FOR CONSTRUCTION
REV. M 02/25/15
Buzzi Unicem USA
MECHANICAL FLOWSHEETS - EQUIPMENT
CLINKER HANDLING, EXISTING STORAGE - FLOWSHEET
MARYNEAL PLANT
MARYNEAL, TX
MN-330-MF-6001



SPECTRUM Environmental Sciences, Inc.

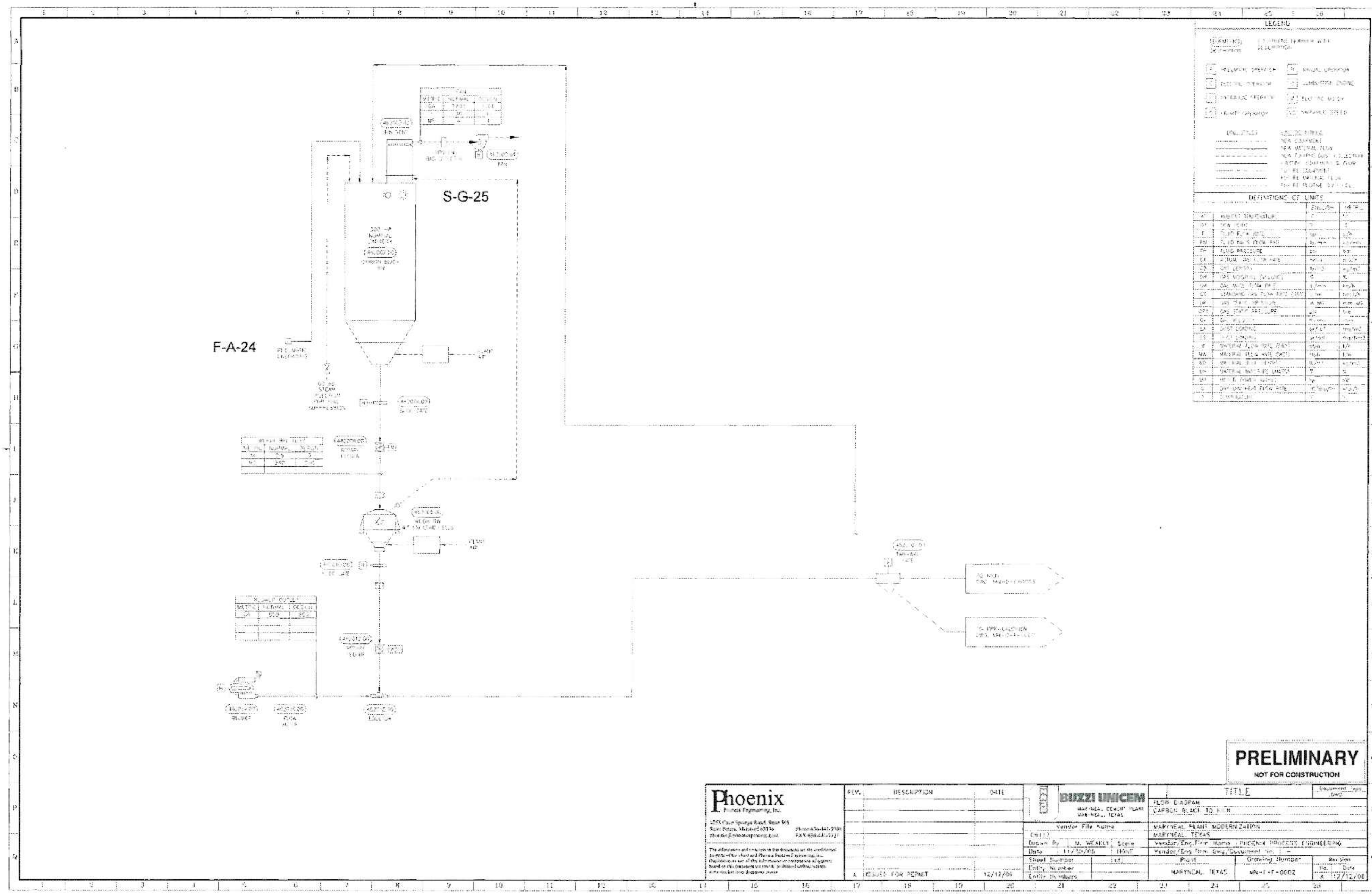
Buzzi Unicem USA

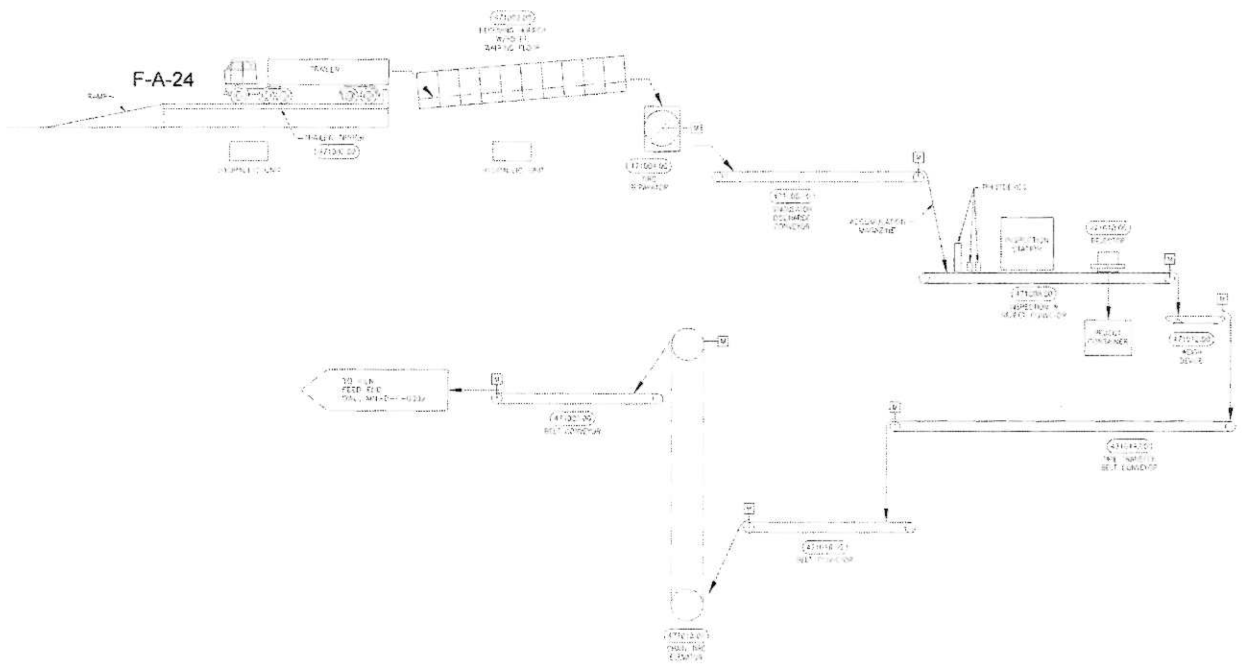
FINISH MILL ADDITIVES DELIVERY AND HANDLING

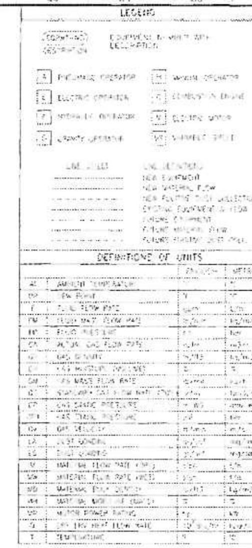
FLOW SHEET

MN32 MARYNEAL PLANT MARYNEAL, TX

MN-100-FM-0000


S-G-25
F-A-24
PRELIMINARY
NOT FOR CONSTRUCTION
Phoenix
REV.
DESCRIPTION
DATE
A
ISSUED FOR PERMIT
12/12/06
BUZZI UNICEM
TITLE
FLOW DIAGRAM
MARYNEAL PLANT MODERNIZATION
MARYNEAL, TEXAS
Vendor File Name
Drawn By
M. WEAKLY
Scale
NONE
Date
Sheet Number
Entity Number
Plant
MARYNEAL, TEXAS
Drawing Number
Revision
LEGEND
DEFINITIONS OF UNITS





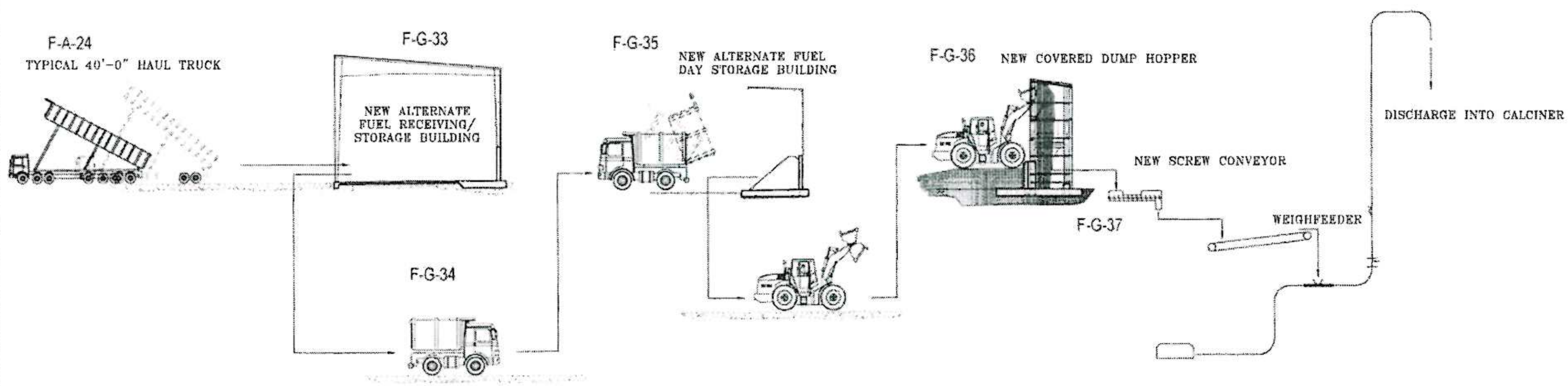
PRELIMINARY
NOT FOR CONSTRUCTION

Phoenix Process Engineering, Inc.		

REV.	DESCRIPTION	DATE
E	TEXT CHANGES	12/12/08
D	ISSUE FOR PERMIT	11/16/06
C	ISSUE FOR PERMIT	10/26/06
B	FOR REVIEW	10/10/06
A	FOR REVIEW	09/15/06

BUZZI UNICEM
MARYNEAL CEMENT PLANT
MARYNEAL, TEXAS

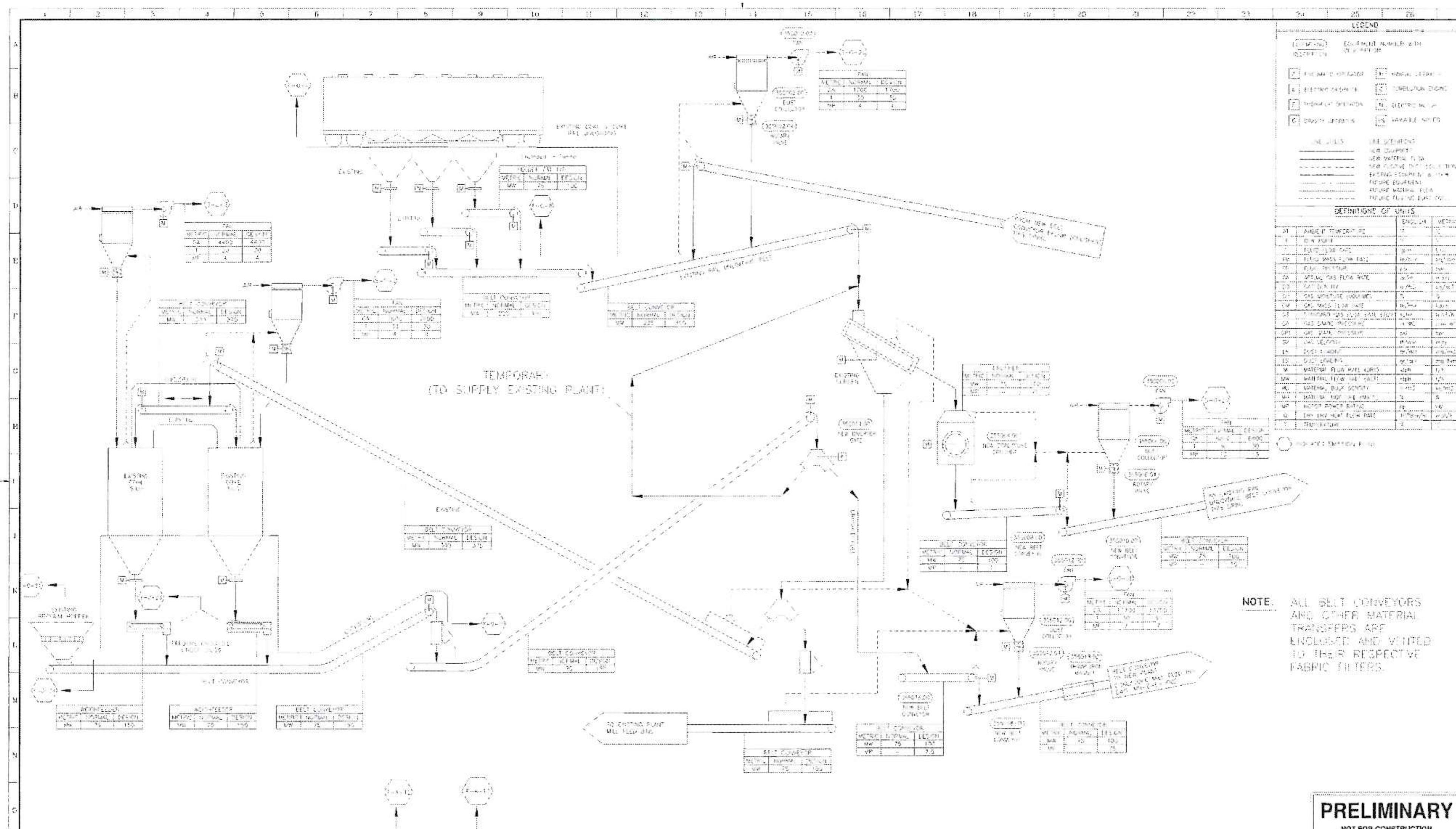
TITLE	FLOW DIAGRAM TIRE BURNING FEED SYSTEM
Vendor File Name	06117
Drawn By	D. MAHN
Date	08/30/06
Scale	NONE
	MARYNEAL PLANT MODERNIZATION MARYNEAL, TEXAS
Vendor/Eng.Firm Name	PHOENIX PROCESS ENGINEERING
Vendor/Eng.Firm Dwg/Document No.	–
Plant	MARYNEAL, TEXAS
Drawing Number	MN-F-F-0001
Revision	E 12/12/06



SPECTRUM
Environmental Sciences, Inc.

BUZZI UNICEM USA INC.

WASTE FUELS (SOLID)
FLOW SHEET
ALTERNATIVE FUELS HANDLING SYSTEM
DOCUMENT NUMBER
MN-100-AF-0000



PRELIMINARY
NOT FOR CONSTRUCTION

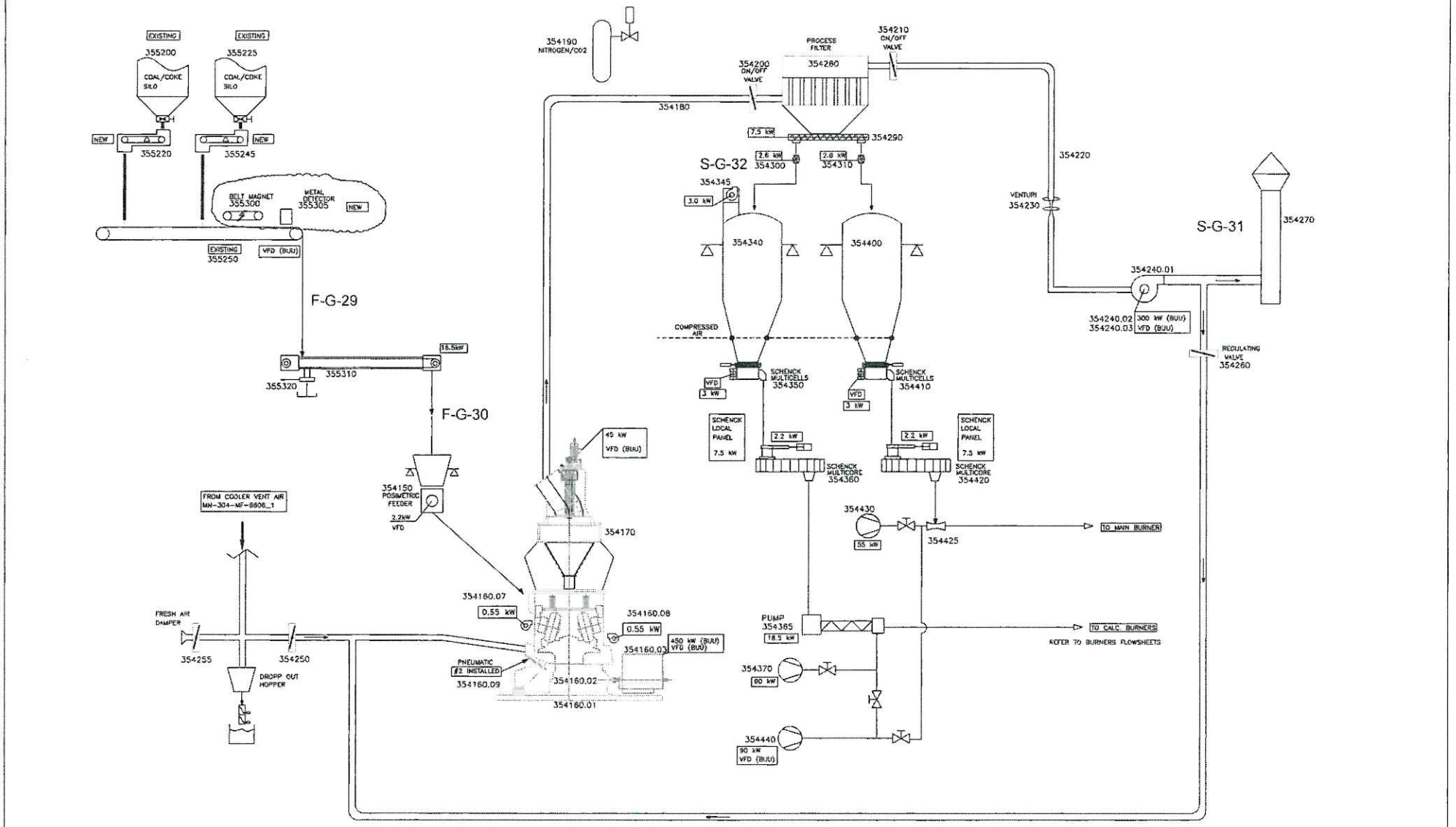
Phoenix Process Engineering, Inc

REV.	DESCRIPTION	DATE
G	Revised points 109, 110	01/22/07
F	Corrected emission point 29	12/26/06
E	ADDED EXISTING EMISSION POINTS	12/12/06
D	ISSUE FOR PERMIT	11/18/06
C	ISSUE FOR PERMIT	10/26/06
B	FOR REVIEW	10/10/06
A	FOR REVIEW	09/15/06

BUZZI UNICEM
MARYNEAL CEMENT PLANT
MARYNEAL, TEXAS

TITLE: FLOW DIAGRAM
EXISTING COAL/PET COKE SYSTEM WITH MODIFICATIONS
MARYNEAL PLANT MODERNIZATION
MARYNEAL, TEXAS

Document Type: DWG
Vendor File Name: 06117
Drawn By: D. HAHN
Date: 08/30/06
Scale: NONE
Vendor/Eng Firm Name: PHOENIX PROCESS ENGINEERING
Vendor/Eng Firm Dwg/Document No.: —
Plant: MARYNEAL, TEXAS
Drawing Number: MN-EHF-0001
Revision: G, 01/22/07



SEPARATOR GREASE PUMP

354160.06

upp. bearing

low bearing

CM#4 HYDRAULIC UNIT
354160.04
SEE MN-354-MF-6000 (2/3)

CM#4 LUBRICATION UNIT
354160.05
SEE MN-354-MF-6000 (3/3)

PROGRESS PRINT
PRELIMINARY - NOT FOR CONSTRUCTION
REV.N° 10/27/14

Buzzi Unicem USA

MECHANICAL FLOWSHEETS EQUIPMENT

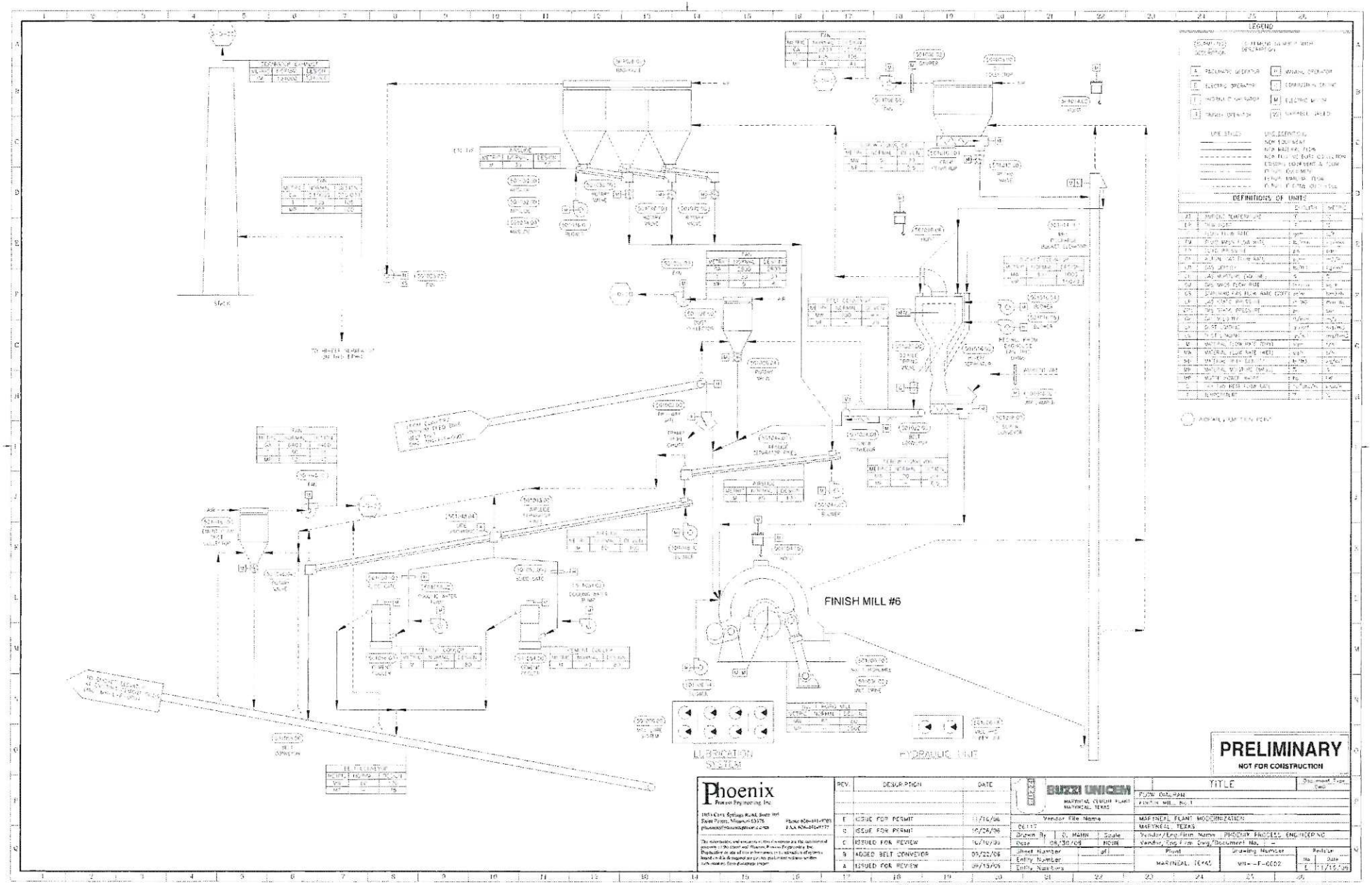
COAL/COKE GRINDING - FLOWSHEET

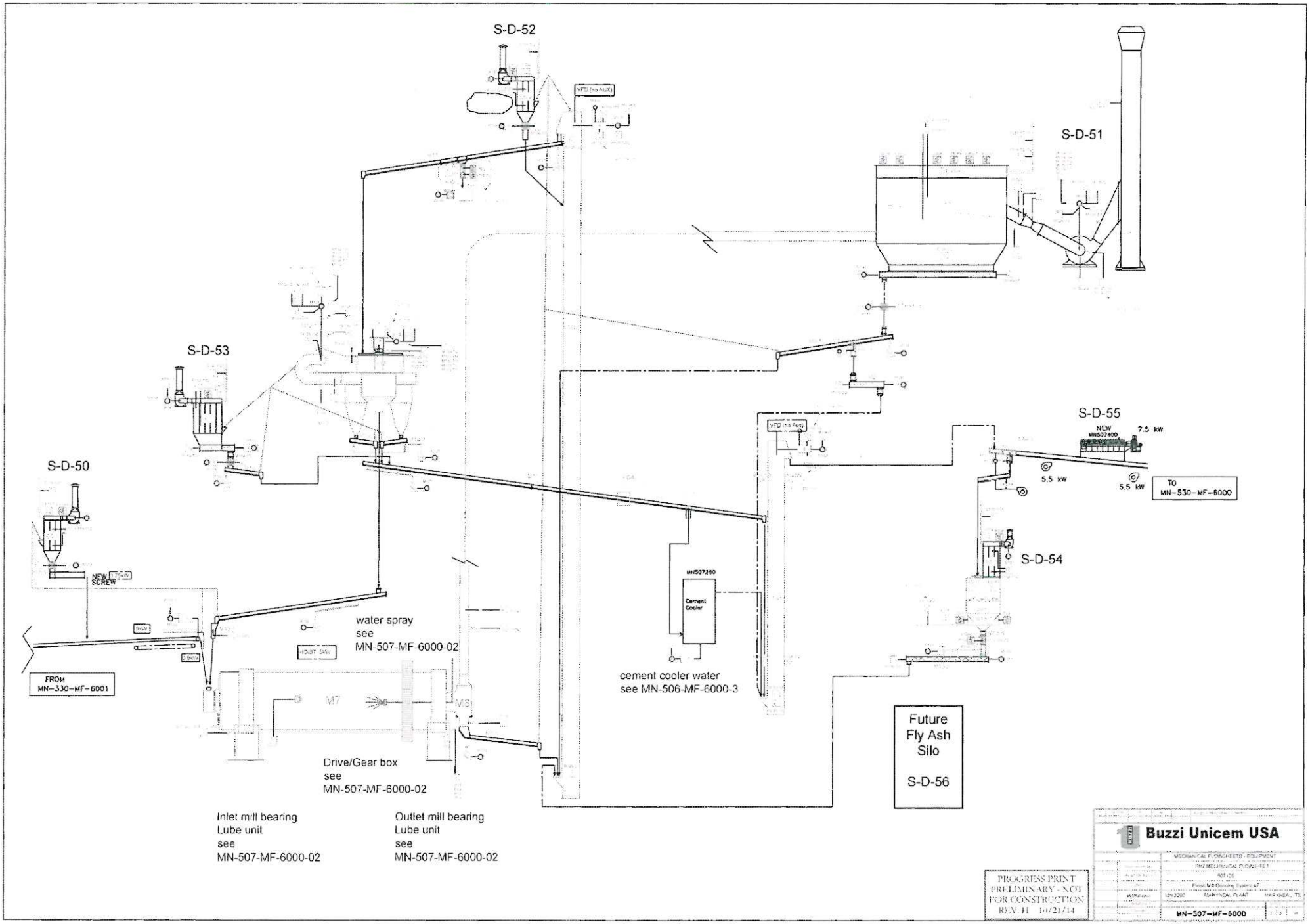
354160

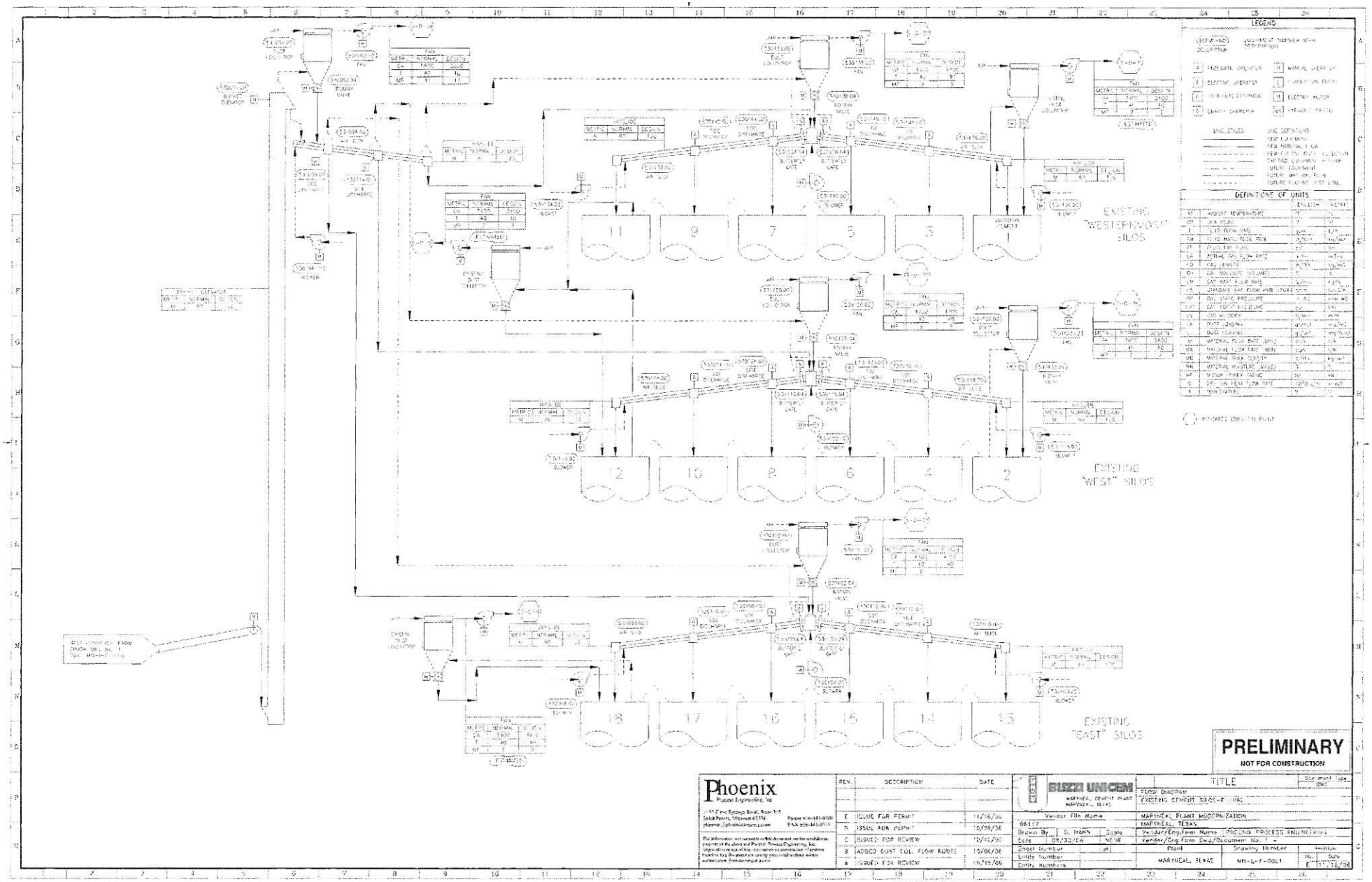
Coal / Coke Mill System #4

MN 3200 MARYNEAL PLANT MARYNEAL, TX

MN-354-MF-6000-1


FINISH MILL #6
LUBRICATION SYSTEM
HYDRAULIC UNIT
PRELIMINARY
NOT FOR CONSTRUCTION
Phoenix
Process Engineering, Inc.
BUZZI UNICEM
MARYNEAL PLANT MODERNIZATION
MARYNEAL, TEXAS
FLOW DIAGRAM
FINISH MILL NO. 1
REV. DESCRIPTION DATE
E ISSUE FOR PERMIT 11/16/06
D ISSUE FOR PERMIT 10/26/06
C ISSUED FOR REVIEW 10/10/06
B ADDED BELT CONVEYOR 09/22/06
A ISSUED FOR REVIEW 09/13/06


S-D-52
S-D-51
S-D-53
S-D-55
S-D-50
S-D-54
NEW 7.5 kW
5.5 kW
5.5 kW
TO MN-530-MF-6000
NEW SCREW
water spray see MN-507-MF-6000-02
cement cooler water see MN-506-MF-6000-3
Cement Cooler
FROM MN-330-MF-6001
M7
M8
Drive/Gear box see MN-507-MF-6000-02
Future Fly Ash Silo
S-D-56
Inlet mill bearing Lube unit see MN-507-MF-6000-02
Outlet mill bearing Lube unit see MN-507-MF-6000-02
Buzzi Unicem USA
PROGRESS PRINT
PRELIMINARY - NOT FOR CONSTRUCTION
REV. H 10/21/14
MN-507-MF-6000



PRELIMINARY

NOT FOR CONSTRUCTION

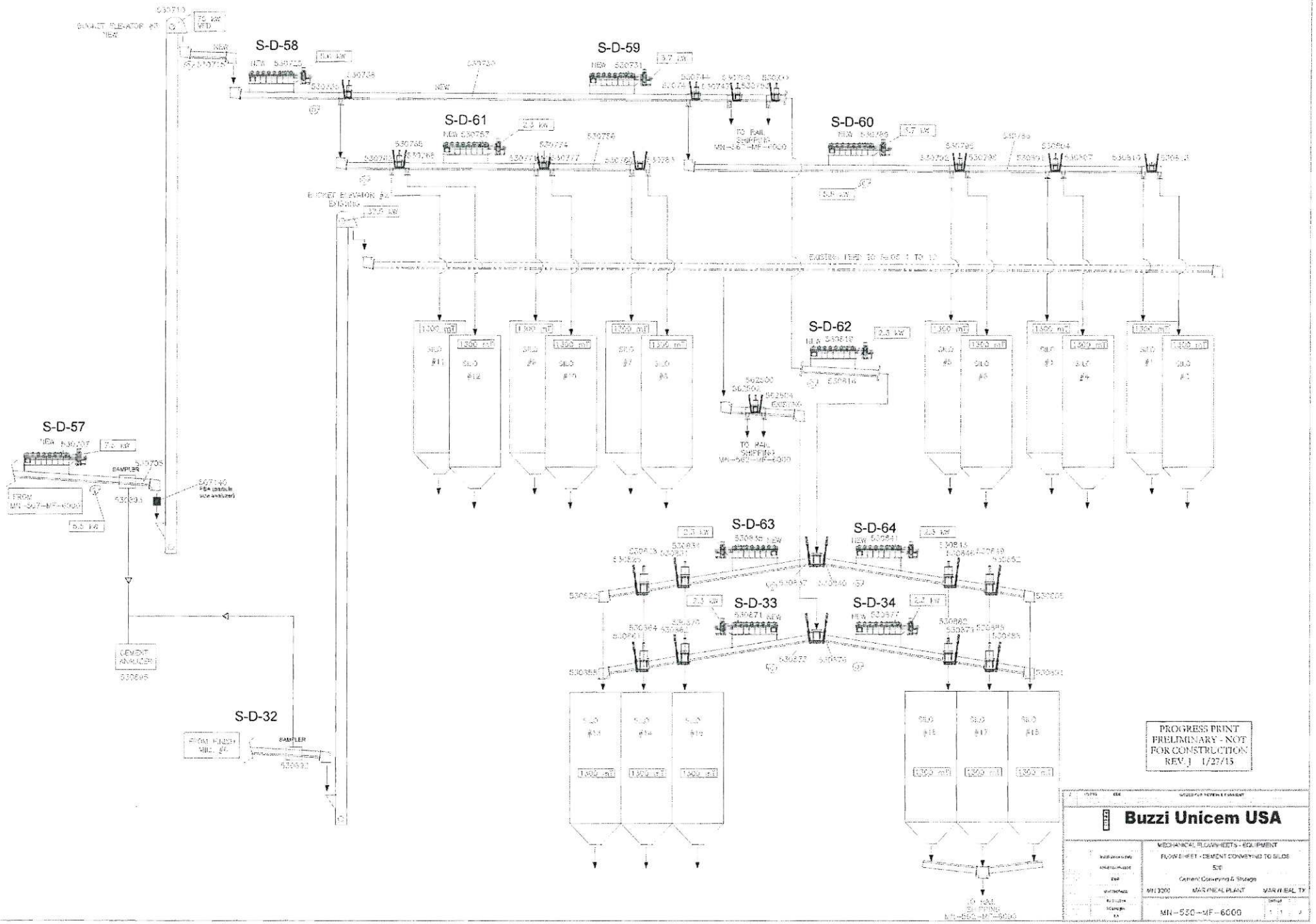
Phoenix
Process Engineering, Inc.

REV.	DESCRIPTION	DATE
E	ISSUE FOR PERMIT	11/16/06
D	ISSUE FOR PERMIT	10/25/06
C	ISSUED FOR REVIEW	10/12/06
B	ADDED DUST COL. FLOW ROUTE	10/06/06
A	ISSUED FOR REVIEW	09/15/06

BUZZI UNICEM
MARTINSAL CEMENT PLANT
MARTINSAL, TEXAS

Vendor File Name	MARTINSAL PLANT MODERNIZATION
06127	MARTINSAL, TEXAS
Drawn By: D. HAHN	Vendor/Eng.Firm Name: PHOENIX PROCESS ENGINEERING
Date: 09/22/06	Vendor/Eng.Firm Dwg/Document No.: N/A
Sheet Number: 1 of 1	Plant: MARTINSAL, TEXAS
Entity Number:	Drawing Number: MH-L-F-0001
Entity Number:	Revision: E 11/16/06

TITLE: FLOW DIAGRAM
EXISTING CEMENT SILOS - F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S-D-59
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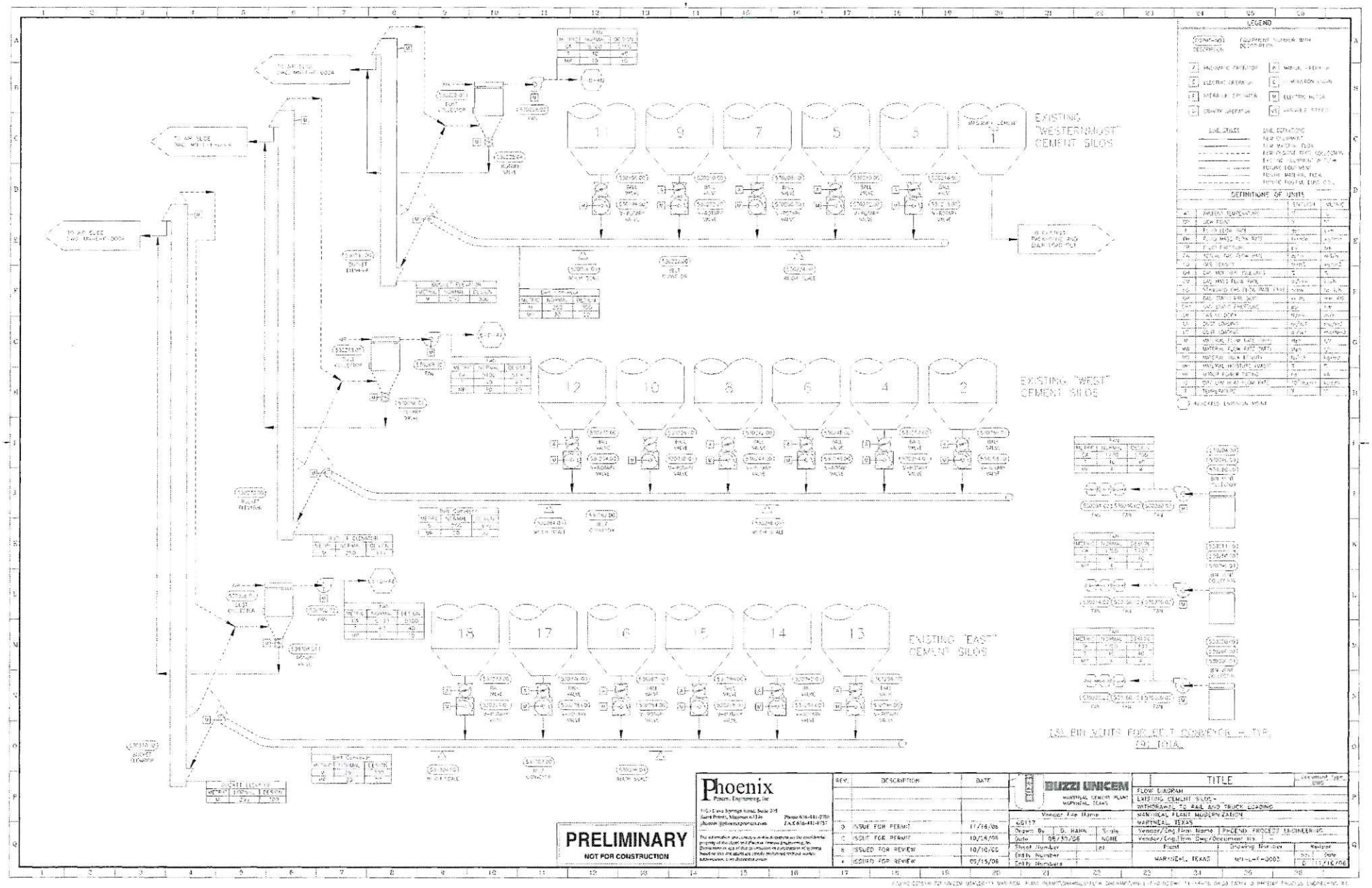
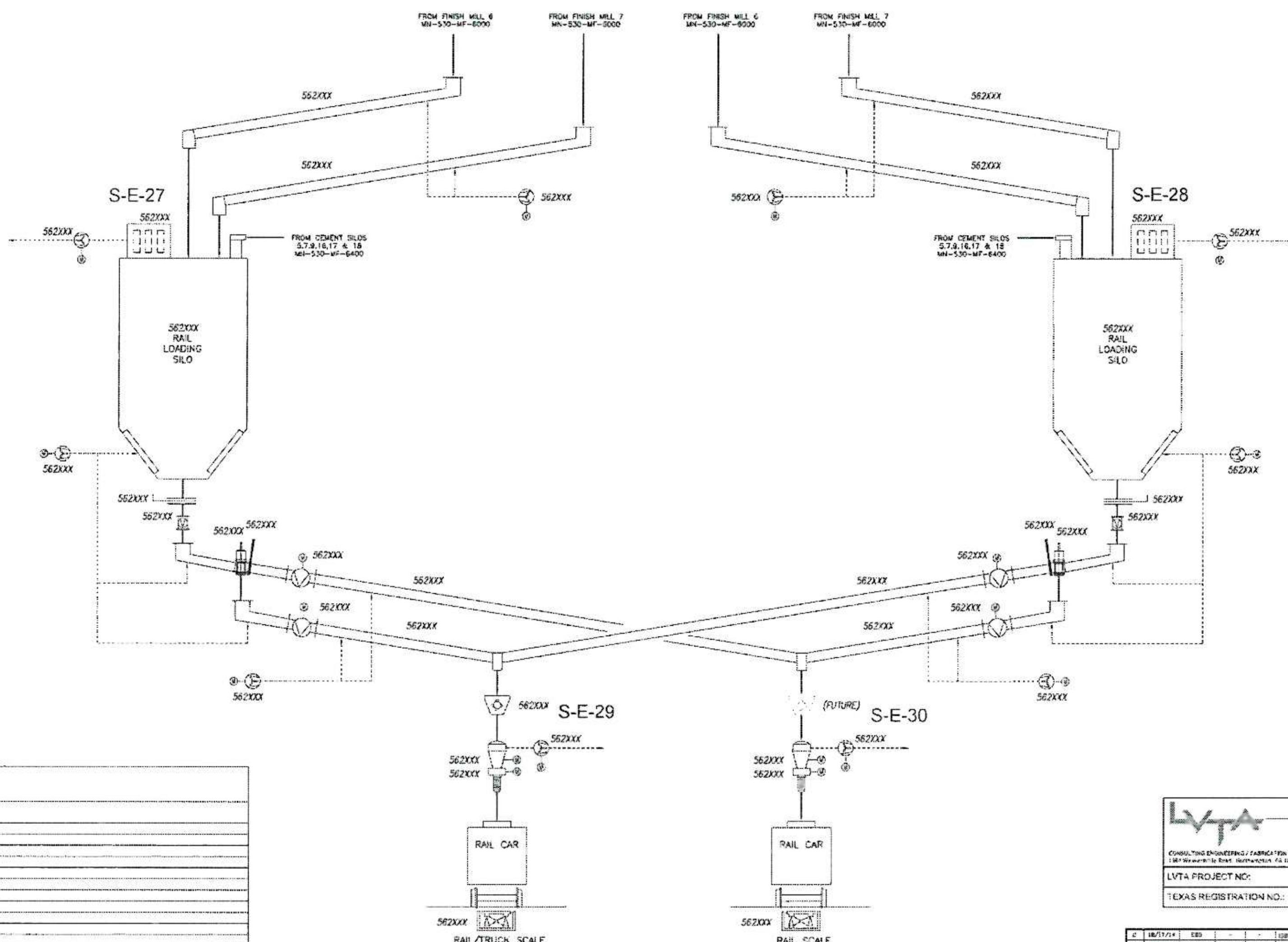
S-D-60
S-D-62
S-D-57
S-D-63
S-D-64
S-D-33
S-D-34
S-D-32
PROGRESS PRINT
PRELIMINARY - NOT
FOR CONSTRUCTION
REV. 1 1/27/15
Buzzi Unicem USA
MECHANICAL FLOWSHEETS - EQUIPMENT
FLOWSHEET - CEMENT CONVEYING TO SILOS
SIZE
Cement Conveying & Storage
MN-SEC-MF-6000


EXISTING "WESTERNMOST" CEMENT SILOS
EXISTING "WEST" CEMENT SILOS
EXISTING "EAST" CEMENT SILOS
LEGEND
DEFINITIONS OF UNITS
PRELIMINARY
NOT FOR CONSTRUCTION
Phoenix
BUZZI UNICEM
MARYNEAL CEMENT PLANT
MARYNEAL, TEXAS
TITLE
FLOW DIAGRAM
EXISTING CEMENT SILOS -
INTERFACING TO RAIL AND TRUCK LOADING
MARYNEAL PLANT MODERNIZATION
MARYNEAL, TEXAS
PHOENIX PROCESS ENGINEERING
MARYNEAL, TEXAS
M11-FLW-0002



LEGEND

EQ.N	DESCRIPTION

PROGRESS PRINT
PRELIMINARY - NOT
FOR CONSTRUCTION
REV. C 12/17/15

LVTA
Lehigh Valley Technical Associates, Inc.
CONSULTING ENGINEERING / FABRICATION DETAILS

LVTA PROJECT NO:	58390
TEXAS REGISTRATION NO.:	F-12053

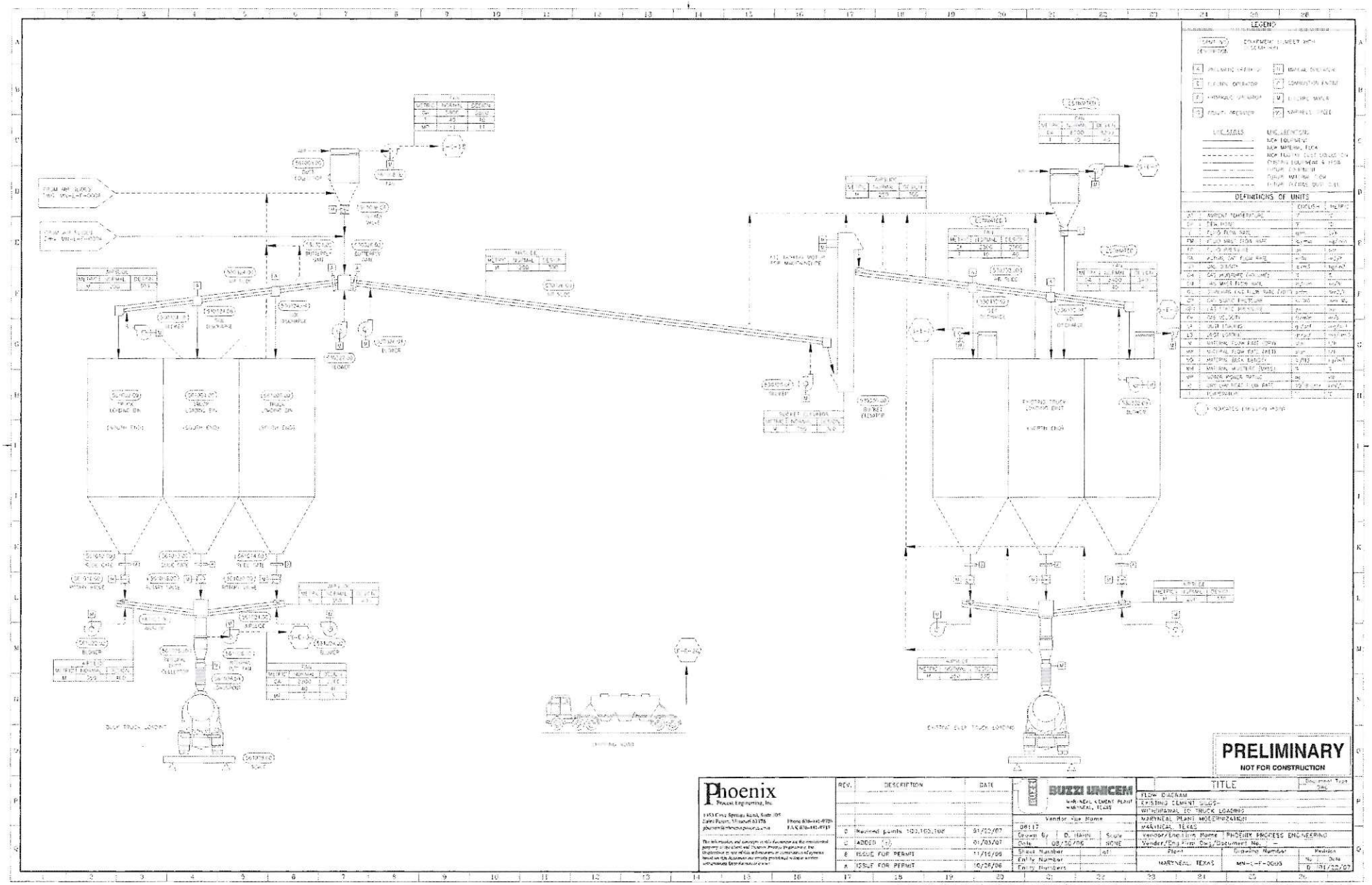
REV.	REV. DATE	DRAWN BY	CHK'D BY	APVR. BY	DESCRIPTION OF REVISION
C	12/17/14	EDD	-	-	ISSUED FOR REVIEW AND COMMENT

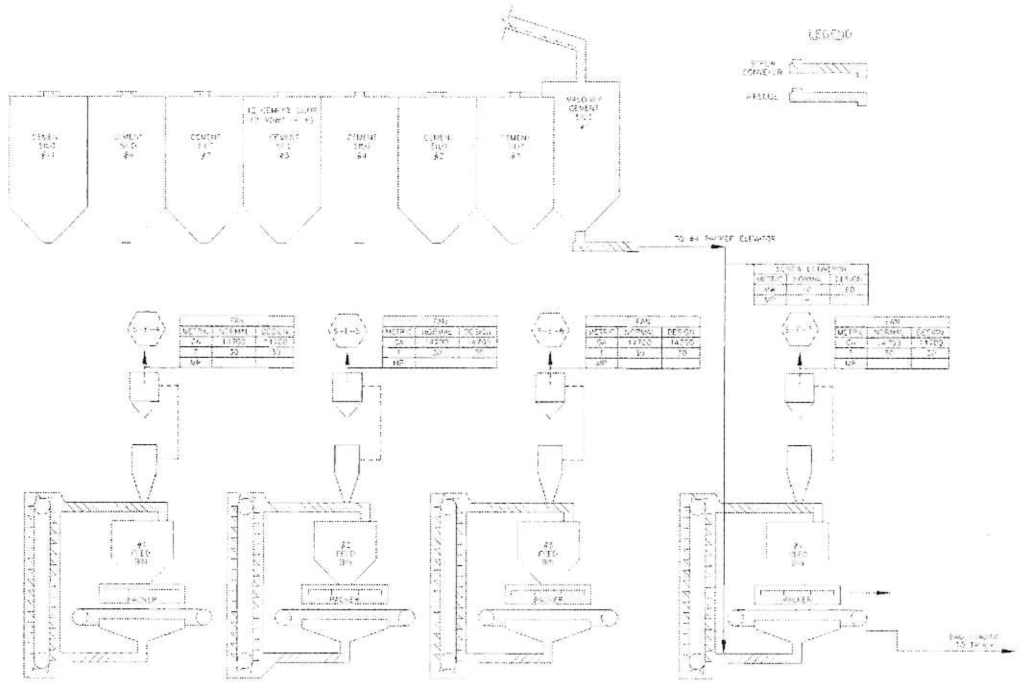
Buzzi Unicem USA

MECHANICAL - EQUIPMENT FLOWSHEET
RAIL CAR LOADING SYSTEM
RAIL CAR LOADING
562
MN32 MARYNEAL PLANT MARYNEAL, TX

VENDOR	LVTA, Inc.
SCALE	-

DOCUMENT NUMBER	SHT/OF	REV
MN-562-MF-6400	1 1	C


LEGEND
DEFINITIONS OF UNITS
PRELIMINARY
NOT FOR CONSTRUCTION
Phoenix
Process Engineering, Inc.
REV. DESCRIPTION DATE
A ISSUE FOR PERMIT 10/26/06
B ISSUE FOR PERMIT 11/15/06
C ADDED (-1) 01/03/07
D Revised Levels 103,105,108 01/22/07
BUZZI UNICEM
MARYNEAL CEMENT PLANT
MARYNEAL, TEXAS
TITLE
FLOW DIAGRAM
EXISTING CEMENT SILOS
WITH/RAIL TO TRUCK LOADING
MARYNEAL PLANT MODERNIZATION
MARYNEAL, TEXAS
PHOENIX PROCESS ENGINEERING
MN-L-FL-0005
D
01/22/07



NOTES:

1. SILO NO. 1 AND PACKER No. 4 TO BE UTILIZED FOR MASONRY CEMENT
2. FOR SILO FILLING SEE FLOW DIAGRAM MN-L-F-0002
3. FOR SILO WITHDRAWAL SEE FLOW DIAGRAM MN-L-F-0003

PRELIMINARY
NOT FOR CONSTRUCTION

Phoenix
Process Engineering, Inc.
1603 Cave Springs Road, Suite 309
Saint Peters, Missouri 63376
phoenix@phoenixprocess.com
Phone 636-441-7700
FAX 636-441-9747

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REV.	DESCRIPTION	DATE
B	REVISED POINTS 133,134,135,138	01/22/07
A	ISSUED FOR PERMIT	01/22/07

BUZZI UNICEM
MARYNEAL CEMENT PLANT
MARYNEAL, TEXAS

Vendor File Name	06117
Drawn By	D. HAHN
Date	08/30/06
Scale	NONE
Sheet Number	of
Entity Number	
Entity Numbers	

TITLE
FLOW DIAGRAM
EXISTING PACKHOUSE
MARYNEAL PLANT MODERNIZATION
MARYNEAL, TEXAS
Vendor/Eng Firm Name: PHOENIX PROCESS ENGINEERING
Vendor/Eng Firm Dwg/Document No: –
Document Type: DWG

Plant	Drawing Number	Revision No.	Date
MARYNEAL, TEXAS	MN-L-F-0006	B	01/22/07

APPENDIX B – OPERATIONS & MAINTENANCE PLAN

A copy of the Plant's 40 CFR 63 Subpart LLL Operations and Maintenance Plan, which is required to be included with all Title V Operating Permit renewal applications per 40 CFR 63.1347(a), is included as Appendix B.

OPERATIONS AND MAINTENANCE PLAN

LONE STAR INDUSTRIES, INC.
dba BUZZI UNICEM USA
MARYNEAL, TEXAS

Date Last Updated:

December 2015

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1.0 INTRODUCTION

1.1 Scope

The *National Emission Standards for Hazardous Air Pollutants* from the Portland Cement Manufacturing Industry require that an Operation and Maintenance Plan (O&M Plan) be in place for the process equipment and air pollution control devices regulated by 40 CFR 63 Subpart LLL and reflect the current PC MACT Final Rule of 2/12/13 (hereinafter "PC MACT Final Rule" or "PC MACT standards"). The purpose of the O&M Plan is to identify the manner in which equipment must be operated and maintained in order to exercise good air pollution control practices, and to facilitate compliance with specific emission standards and operating requirements mandated for PC MACT affected emission sources under the applicable standards.

This O&M Plan is intended to address *only* the processes and systems at the Lone Star Industries, Inc. dba Buzzi Unicem USA Maryneal, Texas facility (Plant) that are regulated under the PC MACT Final Rule, and is not intended to function as a compliance tool for all environmental standards or all Plant processes.

Per the PC MACT Final Rule, the Plant is required to have a written O&M Plan that addresses all PC MACT Final Rule affected sources and includes the following required information per 40 CFR 63.1347(a):

(1) Procedures for proper operation and maintenance of the PC MACT Final Rule affected sources and air pollution control devices in order to meet the PC MACT Final Rule emissions limits and operating limits, including fugitive dust control measures for open clinker piles, as stipulated in 40 CFR 63.1343 through 40 CFR 63.1348. The O&M Plan must also address periods of startup and shutdown.

(2) Corrective actions to be taken when required by 40 CFR 63.1350(f)(3).

(3) Procedures to be used during an inspection of the components of the combustion system of the kiln to be conducted at least once per year.

1.2 Objective

The objective of this O&M Plan is to comply with the requirements of 40 CFR 63.1347 and 40 CFR 63.6(e) by providing Plant personnel with operational and maintenance procedures designed to maintain Plant compliance.

Section 2.0 provides summary tables of the applicable emission limits and monitoring requirements for all PC MACT affected sources. Section 3.0 contains a description of PC MACT affected emission sources and systems. Section 4.0 provides a discussion of emission compliance for Plant systems, Section 5.0 presents a detailed discussion of monitoring of PC MACT affected sources, and Section 6.0 summarizes the corrective action measures. Section 7.0 presents the inspection program used at the Plant. Sections 8.0 presents the recordkeeping requirements for all PC MACT affected sources. Section 9.0 presents Plant startup and shutdown procedures.

1.3 Responsible Parties

The following are the parties responsible for the implementation of this O&M Plan. These parties may designate other personnel as necessary to ensure the tasks are completed.

Responsible Party	Task
Plant Manager	1. Ensure that the provisions of the O&M Plan are followed.
Environmental Manager	1. Periodically review the O&M Plan with appropriate personnel to ensure it is consistent with current plant processes. 2. Identify regulatory changes that require modification of the O&M Plan. 3. Monitor departments' compliance with their provisions of the O&M Plan. 4. Review new process and system changes for items requiring O&M Plan modification.

Responsible Party	Task
Production Manager	1. Train production employees on the procedures specific to their job duties as outlined in the O&M Plan. 2 Periodically review operational procedures to ensure they reflect current plant practices. 3. Monitor production personnel's compliance with the O&M Plan. 4. Present new process and system changes to the Environmental Manager for requisite modifications to the O&M Plan.
Maintenance Manager	1. Train the maintenance employees on the specific procedures outlined in the O&M Plan. 2. Periodically review the maintenance inspection program to ensure that the O&M Plan's provisions reflect current plant processes and procedures. 3. Monitor maintenance personnel's compliance with the O&M Plan inspection procedures. 4. Maintain the maintenance work order and record keeping system. 5. Present new process and system changes to the Environmental Manager for requisite modifications to the O&M Plan.
Engineering	1. Present new process and system changes to the Environmental Manager for requisite modifications to the O&M Plan.
Production Operator	1. Comply with the operational procedures in the O&M Plan. 2. Report deviations from the O&M Plan to the Production Manager or appropriate supervisory personnel as soon as practical.
Maintenance Employee	1. Comply with inspection and maintenance procedures in the O&M Plan. 2. Report deviations from the O&M Plan to the Maintenance Manager or appropriate supervisory personnel.

2.0 PC MACT EMISSION LIMITS AND MONITORING REQUIREMENTS

As outlined by the PC MACT Final Rule, operations at the Plant that are covered by the PC MACT Final Rule include the following PC MACT affected sources as specified in 40 CFR 63.1340:

- Preheater/Precalciner (PH/PC) Kiln with inline Raw Mill,
- Clinker Cooler,
- Two Finish Mills,
- Raw material, clinker, and finished product storage bins,
- Conveying system transfer points including those associated with solid fuel (coal, coke, and carbon black) preparation used to convey solid fuel from the Coal/Coke Ball Mill to the kiln,
- Bagging and bulk loading and unloading systems, and
- Open clinker storage piles.

In the following sections material handling processes is used to describe all raw material, clinker, and finished product storage bins; all conveying system transfer points; and all bagging and bulk loading and unloading systems.

2.1 PC MACT Emission Limits

A summary of applicable emissions limits for each PC MACT affected source group at the Plant is summarized in Table 1.

TABLE 1 – SUMMARY OF PC MACT EMISSION LIMITS

Affected Source	Pollutant	Emission Limit	Source of Limit
PH/PC Kiln with inline Raw Mill	PM	0.02 Lb/Ton Clinker	40 CFR 63.1343(b)(1)
	D/F	0.20 ng TEQ/dscm; or	40 CFR 63.1343(b)(1)
		0.40 ng TEQ/dscm (PM control device operating at ≤ 400 °F)	40 CFR 63.1343(b)(1)
	Hg	21 lbs/million tons clinker, 30-day rolling average	40 CFR 63.1343(b)(1)
	THC	24 parts per million by volume, dry (ppmvd), 30-day rolling average, corrected to 7% oxygen	40 CFR 63.1343(b)(1)
	HCl	3 parts per million by volume, dry (ppmvd), 30-day rolling average, corrected to 7% oxygen	40 CFR 63.1343(b)(1)
Clinker Cooler	PM	0.02 Lb/Ton Clinker, 30-day rolling average,	40 CFR 63.1343(b)(1)
Finish Mills	Opacity	10%	40 CFR 63.1343(b)(1)
Materials Handling Processes	Opacity	10%	40 CFR 63.1345
Open Clinker Storage Piles	Operated in accordance with the fugitive dust emission control measures as identified in Section 4.6 of this O&M Plan.		40 CFR 63.1343(c)

2.2 PC MACT Monitoring Requirements

A summary of the compliance monitoring requirements for each PC MACT affected source group at the Plant is summarized in Table 2. The monitoring must be conducted while the sources are in normal operation.

TABLE 2 – SUMMARY OF PC MACT MONITORING REQUIREMENTS

Affected Source	Pollutant	Monitoring Requirement
PH/PC Kiln with inline Raw Mill	PM	Continuous Parametric Monitoring System (CPMS)
	Temperature	Inlet to Main Baghouse
	THC	Continuous THC Monitor
	Hg	Continuous Hg Monitor
	HCl	Continuous HCl Monitor
Clinker Cooler	PM	Continuous Parametric Monitoring System (CPMS)
Finish Mills	Opacity	Daily 6-Minute Method 22
		If visible emission is observed, initiate corrective action within 1-hour, and then conduct a follow-up 6-minute Method 22 within 24 hours. If visible emission is still observed, conduct a 30-minute Method 9 within 1-hour.
Materials Handling Processes	Opacity	Monthly 10-minute Method 22
		If visible emission is observed, initiate corrective actions within 1-hour, and conduct a 30-minute Method 9 within 1-hour.
Open Clinker Storage Piles	Operated in accordance with the fugitive dust emission control measures as identified in Section 4.6 of this O&M Plan.	

3.0 PC MACT AFFECTED EQUIPMENT AND SYSTEMS

The following is a description of the Plant equipment and systems that are regulated by the PC MACT Final Rule. PC MACT affected sources, as defined in 40 CFR 63.1340(b)(1) through (9), include equipment and associated dust collectors discussed in this O&M Plan and are listed in Attachment A.

3.1 Raw Mill System

All raw material additives to be used in producing raw feed will be unloaded by truck to the additives hopper, which will be partially enclosed to reduce fugitive dust emissions. From the additives hopper, raw material will be conveyed via new belt conveyors to their respective feed bins. Limestone will be conveyed from the quarry to its respective feed gins. All equipment associated with raw material (i.e. limestone and additives) conveying and storage will be vented to dust collectors.

An in-line raw grinding system is used to process raw materials into kiln feed. Raw materials (i.e., limestone and additives) are conveyed from their respective storage feed bins via a system of belt conveyors and elevators to the in-line horizontal-roller type mill. The mill is of the in-line design where hot combustion gases from the Preheater/Precalciner (PH/PC) kiln system are forced into the raw grinding system with the dual function of drying the materials during grinding and to sweep the finely ground particles from the grinding system, carrying them through a dynamic separator system. The off-gases from the in-line mill system will be combined with the vent air from the PH/PC kiln system and directed to the Main Kiln Baghouse. All material collected by the Main Kiln Baghouse will be returned to the process via the raw silo conveyors, while the clean gases leaving the Main Kiln Baghouse will be vented to the atmosphere through the Main Kiln Stack. From the raw mill, all kiln feed will be conveyed via a new conveyor system to the existing raw silos.

3.2 Raw Mix Handling System

From the raw mix blend silos, raw mix is moved between all three banks of silos by combination of screw conveyors and bucket elevators. PM emissions from the silos, elevators, and conveyors are abated by dust collectors. From the raw silos, raw feed is withdrawn in desired proportions and conveyed/blended into the kiln feed bin.

3.3 Fuel Conveyance System

From the Coal/Coke Ball Mill, ground coal, coke, and carbon black are conveyed first to pulverized coal/coke storage bins and then to the PH/PC Kiln System through coal pipes. The conveying of fuel to the PH/PC Kiln System is controlled by the Coal/Coke Ball Mill baghouse. Per 40 CFR 63.1340(b)(7), the PC MACT Final Rule applies to each conveying system transfer point including those associated with coal preparation used to convey solid fuel from the Coal/Coke Ball Mill to the kiln. Therefore, the PC MACT Final Rule applies to the Coal/Coke Ball Mill and pulverized coal/coke bins, which are each controlled by dust collectors.

3.4 Cement Kiln System

From the kiln feed bin, kiln feed is conveyed via a system of air gravity conveyors and elevators to the PH/PC Kiln System. The kiln feed is introduced at the top of the preheater tower that supports a vertically stacked series of cyclones. The kiln feed travels counter-current to the upward flow of the combustion gases from the PH/PC Kiln System. Heat is transferred from the kiln gases to the kiln feed as the kiln feed moves downward through each cyclone. On exiting the bottom-most cyclone vessel, the partially calcined feed enters the rotary kiln. Rotation and gravity conveys the material along the entire length of the kiln where the calcination and sintering processes are completed. When the kiln feed reaches the hot end of the kiln, it has undergone a chemical transformation into Portland cement clinker nodules.

The PH/PC Kiln System gases exit the upper end of the preheater tower and are either forced through the Raw Grinding system when this system is operating or they by-pass the Raw Grinding system. The PH/PC Kiln System gases are then treated by the Main Kiln Baghouse and vent to the atmosphere through the Main Kiln Stack.

Coal and petroleum coke will be fired in the precalciner vessel, i.e. the lowest stage of the cyclone tower, and simultaneously at the hot end of the kiln (in approximately a 60% to 40% ratio) to provide the required energy to the burning process. The PH/PC kiln system can also be fired with natural gas. This fuel will typically be used only during PH/PC kiln system startup and shutdown or during upsets as supplemental fuel.

The PH/PC Kiln System is also permitted to burn carbon black, tires, and fluff as alternative non-waste fuels.

A calcium hydroxide injection system is utilized, as needed, for control of SO_2 emissions from the PH/PC Kiln System. A selective non-catalytic reduction (SNCR) system is utilized, as needed, for control of NO_x emissions from the PH/PC Kiln System.

3.4.1 Raw Materials Used in the Manufacturing Process

Four chemical constituents are needed to form cement clinker. These ingredients include calcium, silica, alumina, and iron. The raw materials for the PH/PC Kiln System process include materials obtained from both onsite and offsite sources. Calcium is the major ingredient of clinker and is obtained primarily from

onsite limestone quarries. The majority of additional components are provided from offsite suppliers. Additional raw materials may include clay, sand, ceramic scrap, mill scale, iron ore, fly ash, spent catalysts, aluminum filter cake, bauxite ore, or other similar materials.

3.5 Clinker Cooler System

The clinker is discharged from the PH/PC Kiln System into a Clinker Cooler. The Clinker Cooler utilizes ambient air, which is forced through the bed of clinker by fans to cool the hot clinker. The clinker travels on moveable grates through the Clinker Cooler. The hot gases from the Clinker Cooler are either utilized by the PH/PC Kiln System as secondary combustion air or are discharged through one of three dust collectors that abates PM from the gases. The #2 and #3 Clinker Cooler Baghouse exhaust gases exit through one common stack. The #1 Clinker Cooler Baghouse exhaust gases exits from one dedicated stack.

3.6 Clinker Handling and Storage System

The cooled clinker is conveyed via a system of pan conveyors, elevators, and belt conveyors to two clinker storage silos. From the clinker storage silos, the clinker is conveyed to a series of storage bins constructed within the Craneway Storage Building. The clinker conveying and storage is abated with the use of dust collectors.

Additive materials for finish grinding (e.g., gypsum, anhydrite, and limestone) are trucked from the quarry or offsite to be stored in piles within the Craneway Storage Building. From their storage piles, the additive material is transferred to new storage bins constructed within the Craneway Storage Building. The storage bins are abated with the use of dust collectors.

Off-spec clinker may, as needed, be stored in an open clinker storage pile within the Craneway Storage Building and is regulated by 40 CFR 63.1343(c), to minimize fugitive dust emissions from piles of clinker, including accidental spillage.

3.7 Finish Mill System

Two finish mills are utilized at the Plant. Finish Mill #6 is a vertical horomill and Finish Mill #7 is a rotatory ball mill. The finish mills receive finish materials, such as clinker, gypsum, anhydrite, and

limestone, conveyed via a system of pan conveyors, belt elevators, and belt conveyors from their storage bins in the Craneway Storage Building. From the two finish mills, cement is conveyed to the cement storage silos. All finish mill activities are controlled by dust collectors. In addition, Finish Mill #6 is equipped with a natural-gas fired heater, to be utilized during cold weather months to warm the finish grinding materials. The heater itself is not subject to the PC MACT Final Rule.

3.8 Cement Handling System

The cement is transferred from the cement storage silos to either one of two truck loadout systems, one of two rail load-out systems, or to one of four packaging machines. All cement handling systems are controlled by dust collectors.

4.0 EMISSION COMPLIANCE

This section outlines the applicable PC MACT emission limitations for each PC MACT affected source identified in Section 3.0. Section 2.1 previously presented a summary of applicable PC MACT affected source emission limits, these emission limits are also provided below for reference. The operating and maintenance techniques are also addressed in this section.

4.1 Raw Mill System

Raw materials are transported to the raw mill system by a series of belt conveyors and bucket elevators. The PC MACT standards applicable to the raw mill system are opacity.

4.1.1 Opacity

The following describes the corresponding procedures necessary to maintain compliance of the raw mill system within the opacity limits.

4.1.1.1 Emission Standard

The emission standard for the raw mill system is 10% opacity.

4.1.1.2 Equipment Description

The raw mill system is described in Section 3.1. PC MACT affected sources include:

- raw mill feed bins
- weigh feeders
- conveyor belts
- screw conveyors
- pneumatic conveying system
- bucket elevators
- associated dust collectors
- associated transfer points

4.1.1.3 Operating Techniques

The methods used to achieve PM control include the use of:

- flexible skirting along the sides of conveyor belting
- sealed chutes at the entrance to and exit from transfer point housings
- covers and/or enclosures around conveying equipment
- associated dust collectors

The dust collectors will be operated such that particulate emissions remain at or below permit limits.

4.1.1.4 Maintenance Techniques

The skirting, drop chutes, conveyor covers, and dust collectors used in the raw mill system are periodically maintained to assure they remain in adequate operational condition. This involves routine inspection and, as necessary, repairs. See Attachment B for inspection and maintenance techniques on the above equipment.

4.2 Raw Mix Handling System

Raw mix is blended in the raw mix handling system and transferred to the kiln feed bin. The PC MACT standard applicable to the raw mix handling system is opacity.

4.2.1 Opacity

The following describes the standards and corresponding procedures necessary to maintain compliance of the raw mix handling system within the opacity limit.

4.2.1.1 Emission Standard

The emission standard for the raw mix handling system is 10% opacity.

4.2.1.2 Equipment Description

The raw mix handling system is described in Section 3.2. PC MACT affected sources include:

- raw mix blend silos
- air slides
- screw conveyors
- bucket elevators
- associated dust collectors
- associated transfer points

4.2.1.3 Operating Techniques

The methods used to achieve PM control include the use of:

- sealed drop chutes at the entrance to and exit from transfer point housings
- covers and/or enclosures around conveying equipment
- associated dust collectors

The dust collectors will be operated such that emissions remain at or below permit limits.

4.2.1.4 Maintenance Techniques

The drop chutes, conveyor covers, and dust collectors used in the raw mix handing system are periodically maintained to assure they remain in adequate operational condition. This involves routine inspection and, as necessary, repairs. See Attachment B for inspection and maintenance techniques on the above equipment.

4.3 Solid Fuel Conveyance System

Coal, coke, and carbon black are transferred to the kiln by dedicated solid fuel conveyance systems. The solid fuel conveyance system PC MACT affected sources are the alternate fuel hopper, alternate fuel weigh feeders, alternate fuel conveyors, carbon black silo, Coal/Coke Ball Mill, and Pulverized Coal/Coke Bins. These PC MACT affected sources are subject to an opacity standard.

4.3.1 Opacity

The following describes the standards and corresponding procedures necessary to operate and maintain the fuel blend conveyance system for compliance with the opacity limit.

4.3.1.1 Emission Standard

The emission standard for the fuel blend conveyance system and associated transfer points is 10% opacity.

4.3.1.2 Equipment Description

The fuel blend conveyance system is described in Section 3.3. PC MACT affected sources include:

- hoppers
- weigh feeders
- conveyors
- coal pipes
- carbon black silo
- carbon black rotary airlock feeder
- carbon black heated screw conveyor
- carbon black air blower

4.3.1.3 Operating Techniques

The methods used to achieve PM control include the use of:

- sealed drop chutes at the entrance to and exit from transfer point housings
- coal pipes
- covers and/or enclosures around conveying equipment
- associated dust collectors

4.3.1.4 Maintenance Techniques

The coal pipes, drop chutes, conveyor covers, and dust collectors used in the blended fuel conveyance system are periodically inspected to assure they remain in adequate

operational condition. This involves routine inspection and, as necessary, repairs.

4.4 Cement Kiln System

The Plant operates a preheater/Precalciner (PH/PC) kiln with an inline raw mill. The PC MACT emission standards for the PH/PC Kiln System includes particulate matter (PM), dioxins and furans (D/F), Mercury (Hg), Total Hydrocarbons (THC), and Hydrogen Chloride (HCl).

4.4.1 Particulate Matter

The following describes the standards and corresponding procedures necessary to operate and maintain the PH/PC Kiln System for compliance with the PM standards.

4.4.1.1 Emission Standards

The emission limit specified for PM emissions is:

- 0.02 Lb/Ton Clinker or an applicable PM continuous parameter monitoring system (CPMS) limit.

4.4.1.2 Equipment Description

The PH/PC Kiln System is described in Section 3.4. PC MACT affected sources include:

- pneumatic conveying system
- kiln feed bins
- weigh feeders
- screw conveyors
- bucket elevators
- associated dust collectors
- associated transfer points

4.4.1.3 Operating Techniques

The methods used to achieve PM control include the use of:

- sealed chutes at the entrance to and exit from transfer point housings
- covers and/or enclosures around conveying equipment
- associated dust collectors

The dust collectors will be operated such that particulate emissions remain at or below permit limits.

4.4.1.4 Maintenance Techniques

The drop chutes, enclosures, conveyor covers, and dust collectors used in the PH/PC Kiln System are periodically maintained to assure they remain in adequate operational condition. This involves conducting routine inspection and, as necessary, repairs. See Attachment B for inspection and maintenance techniques on the above equipment.

4.4.2 Dioxins and Furans

The following describes the standards and corresponding procedures necessary to maintain compliance of the PH/PC Kiln System with the D/F standards.

4.4.2.1 Emission Standards

Compliance with the D/F emission limit is accomplished by monitoring and maintaining operations to ensure control of the Main Kiln Baghouse inlet temperature.

The two possible limits specified for D/F emissions are:

- 0.20 ng per dscm (8.7×10^{-11} gr per dscf) (TEQ) corrected to seven percent oxygen; or

- 0.40 ng per dscm (1.7×10^{-10} gr per dscf) (TEQ) corrected to seven percent oxygen, when the average of the performance test run average

temperatures at the inlet to the particulate matter dust collector is 204 °C (400 °F) or less.

As a parametric monitoring system parameter for compliance with the D/F limit, the temperature of the kiln system exhaust gases at the inlet to the Main Kiln Baghouse is limited according to the average of the run average temperatures measured during the most recent performance test conducted in accordance with 40 CFR 63.1349(b)(3). This performance testing must be repeated every 30 months using Method 23.

During performance testing, temperature limits are established. Compliance with the temperature limits are based on a three-hour rolling average temperature using 180 successive 1-minute averages.

4.4.2.2 Equipment Description

The PH/PC Kiln System is described in Section 3.4. Water spray systems have been installed to assist in maintaining the dust collector inlet temperatures below the required limit. The systems are also equipped with tempering air dampers to add outside air in the event that additional cooling is necessary.

PC MACT affected sources include:

- water spray system
- emergency air tempering dampers
- tempering air dampers
- dust collector inlet thermocouples

4.4.2.3 Operating Techniques

Compliance with the D/F emission limit is accomplished by monitoring the inlet temperature to the Main Kiln Baghouse. The operation of the water spray systems and/or tempering air dampers will be adjusted to maintain the Main Kiln Baghouse inlet temperature at or below the limit set during performance testing.

4.4.2.4 Maintenance Techniques

The water spray system, thermocouples, and tempering air dampers used in the PH/PC Kiln System is periodically maintained to assure they remain in adequate operational condition. This involves routine inspection and, as necessary, repairs. See Attachment B for maintenance techniques on the above equipment.

4.4.3 Mercury (Hg)

4.4.3.1 Emission Standards

Per 40 CFR 63.1343(b)(1), Mercury is limited to 21 lbs per million tons of clinker produced.

4.4.3.2 Equipment Description

Mercury is continuously monitored as the PH/PC Kiln System operates. The emissions associated with mercury are controlled by operation parameters and raw material usage. Operational parameters and raw materials are constantly adjusted to maintain operations below the PC MACT Final Rule emission limit.

4.4.3.3 Operating Techniques

The operation of the PH/PC Kiln System is conducted in accordance with the equipment vendor and in-house guidelines. The detailed procedures for the PH/PC Kiln System operation are contained in the Plant's SOP.

4.4.3.4 Maintenance Techniques

The Main Kiln Baghouse is periodically inspected for damage to the dust collector skeleton, equipment associated with cleaning, collection hopper(s), and dust collection bags. Inspection program details are provided in Section 7.0.

Inspections will be conducted according to the Plant SOP. A sample inspection form is provided in Attachment B.

The Hg monitor is maintained per the manufacturer's specifications and procedures for its operation are contained in the Plant's SOP and the Altech PC MACT CEM QA/QC Plan.

4.4.4 Total Hydrocarbons (THC)

4.4.4.1 Emission Standards

Per 40 CFR 63.1343(b)(1), total hydrocarbon emissions (measured as propane) shall be limited to 24 parts per million by volume, dry (ppmvd), calculated as a 30-day rolling average (representing normal operation), and corrected to 7 percent oxygen. Instead of meeting the THC limits of 24 ppmvd, the Plant may elect to meet an alternative limit of 12 ppmvd for total organic HAP.

4.4.4.2 Equipment Description

Total hydrocarbons are continuously monitored as the PH/PC Kiln System operates. The emissions associated with THC are controlled by operation parameters and raw material usage. Operational parameters and raw materials are constantly adjusted to maintain operations below the PC MACT Final Rule emission limit.

4.4.4.3 Operating Techniques

The operation of the PH/PC Kiln System is conducted in accordance with the equipment vendor and in-house guidelines. The detailed procedures for the PH/PC Kiln System operation are contained in the Plant's SOP.

4.4.4.4 Maintenance Techniques

The Main Kiln Baghouse is periodically inspected for damage to the dust collector skeleton, equipment associated with cleaning, collection hopper(s), and dust collection bags. Inspection program details are provided in Section 7.0.

Inspections will be conducted according to the Plant SOP. A sample inspection form is provided in Attachment B.

The THC monitor is maintained per the manufacturer's specifications and procedures for its operation are contained in the Plant's SOP and the Altech PC MACT CEM QA/QC Plan.

4.4.5 Hydrogen Chloride (HCl)

4.4.5.1 Emission Standards

Per 40 CFR 63.1343(b)(1), Hydrogen chloride emissions shall be limited to 3 parts per million by volume, dry (ppmvd), corrected to 7% oxygen (normal operation) calculated as a 30-day rolling average.

4.4.5.2 Equipment Description

Hydrogen chloride is continuously monitored as the PH/PC Kiln System operate. The emissions associated with hydrogen chloride are controlled by operation parameters and raw material usage. Operational parameters and raw materials are constantly adjusted to maintain operations below the PC MACT Final Rule emission limit.

4.4.5.3 Operating Techniques

The operation of the PH/PC Kiln System is conducted in accordance with the equipment vendor and in-house guidelines. The detailed procedures for the PH/PC Kiln System operation are contained in the Plant's SOP.

4.4.5.4 Maintenance Techniques

The Main Kiln Baghouse is periodically inspected for damage to the dust collector skeleton, equipment associated with cleaning, collection hopper(s), and dust collection bags. Inspection program details are provided in Section 7.0.

Inspections will be conducted according to the Plant SOP. A sample inspection form is provided in Attachment B.

The HCl monitor is maintained per the manufacturer's specifications and procedures for its operation are

contained in the Plant's SOP and the Altech PC MACT CEM QA/QC Plan.

4.5 Clinker Cooler System

The Plant operates a clinker cooler associated with the PH/PC Kiln System. The PC MACT standard applicable to the clinker cooler system is PM. The clinker cooler exhausts to one of three baghouses. The #2 and #3 Clinker Cooler baghouses exhaust gases exit through one common stack. The #1 Clinker Cooler baghouse exhaust gas exits from one dedicated stack.

4.5.1 Particulate Matter

The following describes the standards and corresponding procedures necessary to operate and maintain the clinker cooler system for compliance with the PM standard.

4.5.1.1 Emission Standards

The emission limit specified for PM emissions is:

- 0.02 Lb/Ton Clinker or an applicable PM continuous parameter monitoring system (CPMS) site-specific operating limit.

4.5.1.2 Equipment Description

The clinker cooler system is described in Section 3.5. PC MACT affected equipment in the clinker cooler system includes:

- clinker cooler
- screw conveyors
- heat exchanger
- associated dust collectors
- associated transfer points

4.5.1.3 Operating Techniques

The methods used to achieve PM control include the use of:

- sealed chutes at the entrance to and exit from transfer point housings
- covers and/or enclosures around conveying equipment
- associated dust collectors

The dust collectors will be operated such that particulate emissions remain at or below permit limits.

4.5.1.4 Maintenance Techniques

The drop chutes, enclosures, conveyor covers, and dust collectors used in the clinker cooler system are periodically maintained to assure they remain in adequate operational condition. This involves routine inspection and, as necessary, repairs. See Attachment B for maintenance techniques on the above equipment.

4.6 Clinker Handling and Storage System

Clinker is transferred from the clinker cooler to one of two clinker storage silos and is then conveyed to clinker storage bins within the Craneway Storage Building. Additive materials for finish grinding (e.g., gypsum, anhydrite, and limestone) are also stored within the Craneway Storage Building first in storage piles and then transferred to specific storage bins. The PC MACT standard applicable to the clinker handling and storage system is opacity.

As previously discussed in Section 3.6, off-spec clinker may, as needed, be stored in an open clinker storage pile within the Craneway Storage Building and is regulated by 40 CFR 63.1343(c), Open Clinker Storage Piles, to minimize fugitive dust emissions from piles of clinker, including accidental spillage.

The fugitive emissions from this open clinker storage pile will be controlled by the pile being located within a partial enclosure which has been determined to be the most appropriate and representative of the site conditions that exist at the Plant.

In addition to the clinker storage piles, temporary piles of clinker that result from accidental spillage or clinker storage cleaning operations

must be cleaned up within 3 days, per 40 CFR 63.1343(c)(3). If the Plant is unable to clean up the spilled clinker within 3 days, these areas will be controlled by partial enclosure, installing or operating a water spray or fogging system, applying appropriate chemical dust suppression agents, use of a wind barrier, compaction, use of tarpaulin or other equally effective cover, or use of a vegetative cover.

4.6.1 Opacity

The following describes the standards and corresponding procedures necessary to operate and maintain the clinker handling and storage system, except for open clinker storage piles, for compliance with the opacity standard. Open clinker storage piles do not have an opacity limit.

4.6.1.1 Emission Standard

Per 40 CFR 63.1345, the PC MACT standard for the clinker handling and storage system transfer points is 10% opacity.

4.6.1.2 Equipment Description

The clinker handling and storage system is described in Section 3.6. PC MACT affected sources include:

- drag chain conveyors
- belt conveyor
- bucket elevators
- screw conveyors
- storage bins
- associated dust collectors
- associated transfer points

4.6.1.3 Operating Techniques

The methods used to control PM include:

- maintaining the flexible skirting along the side of conveyor belting
- the use of sealed drop chutes at the entrance to and exit from transfer point housings
- the use of covers and/or enclosures around conveyors

- the use of associated dust collectors

The dust collectors will be operated such that emissions remain at or below permit limits

4.6.1.4 Maintenance Techniques

The skirting, drop chutes, conveyor covers, and dust collectors used in the clinker handling and storage system are periodically maintained to assure they remain in adequate operational condition. This involves routine inspection and, as necessary, repairs. See Attachment B for inspection and maintenance techniques on the above equipment.

4.7 Finish Mill Systems

Cement is produced by grinding clinker, gypsum, and other additives as needed in one of the two finish mill systems. The PC MACT standard applicable to the finish mill systems is opacity.

4.7.1 Opacity

The following describes the PC MACT standards and corresponding procedures necessary to operate and maintain the finish mill systems for compliance with the opacity standard.

4.7.1.1 Emission Standard

The emission standard for the finish mill systems is 10% opacity per 40 CFR 63.1345.

4.7.1.2 Equipment Description

The finish mill systems are described in Section 3.7. PC MACT affected sources include:

- finish mills
- air separators
- air slides
- weigh feeders
- cement coolers
- bucket elevators
- screw conveyors

- associated dust collectors
- associated transfer points

4.7.1.3 Operating Techniques

The methods used to control PM include:

- sealed drop chutes at the entrance to and exit from transfer point housings;
- covers and/or enclosures around conveying equipment;
- associated dust collectors; and

The dust collectors will be operated such that emissions remain at or below the PC MACT opacity limit.

4.7.1.4 Maintenance Techniques

The drop chutes, enclosures, conveyor covers, and dust collectors used in the finish mill systems are periodically maintained to assure they remain in adequate operational condition. This involves routine inspection and, as necessary, repairs. See Attachment B for maintenance techniques on the above equipment.

4.8 Cement Handling System

Finished cement is transferred to the appropriate loading station or storage facility by the cement handling system. The PC MACT standard applicable to the cement handling system is opacity per 40 CFR 63.1345.

4.8.1 Opacity

The following describes the PC MACT standard and corresponding procedures necessary to operate and maintain the cement handling system for compliance with the opacity standard.

4.8.1.1 Emission Standard

The emission standard for the cement handling system is 10% opacity.

4.8.1.2 Equipment Description

The cement handling mill system is described in Section 3.8. PC MACT affected sources include:

- cement storage silos
- air slides
- screw conveyors
- pneumatic equipment
- dust collectors
- associated transfer points
- loading facilities

4.8.1.3 Operating Techniques

The methods used to achieve PM control include the use of:

- sealed drop chutes at the entrance to and exit from transfer point housings;
- covers and/or enclosures around conveying equipment;
- associated dust collectors

4.8.1.4 Maintenance Techniques

The drop chutes, enclosures, conveyor covers, and dust collectors used in the cement handling system are periodically maintained to assure they remain in adequate operational condition. This involves conducting routine inspections and, as necessary, repairs. See Attachment B for inspection and maintenance techniques on the above equipment.

5.0 MONITORING OF PC MACT AFFECTED SOURCES

Table 2 previously summarized PC MACT monitoring requirements. This section of the Plan also describes in detail the procedures used to periodically conduct visual emissions monitoring of PC MACT affected sources, such as raw material, clinker, and finished product storage bins; conveying system transfer points; bagging systems; and bulk loading and unloading systems (i.e., "material handling points"); finish mills, PH/PC Kiln System, and Clinker Cooler.

5.1 Material Handling Points

Periodic visual emissions observations, in accordance with 40 CFR 63.1350(f)(1), are required for each material handling point PC MACT affected source and are subject to the provisions of 40 CFR 63.1345. The test must be conducted under normal operating conditions. The periodic monitoring procedures outlined below are consistent with PC MACT Final Rule requirements.

Opacity (i.e., visual emissions) is measured at the previously noted PC MACT affected sources in accordance with EPA Method 22 of Appendix A to 40 CFR Part 60 and Method 9 of Appendix A to 40 CFR Part 60 visible emission evaluation methods. Method 22 and Method 9 evaluations are conducted as described below.

- Monthly 10-minute visible emissions tests of each PC MACT affected source are conducted in accordance with Method 22 while the PC MACT affected sources are in operation.

- If visible emissions are observed during any Method 22 test, the facility will conduct a 30-minute test of opacity in accordance with Method 9 within 1-hour of the observation of visible emissions during the Method 22 test. If visible emissions are observed during any Method 22 test the Plant will also initiate, within one-hour, the corrective actions specified in Section 6.2 of this O&M Plan, as required by 40 CFR 63.1347.

- If no visible emissions are observed in six consecutive monthly tests for any PC MACT affected source, the frequency of Method 22 testing may be decreased from monthly to semi-annually for that PC MACT affected source.

- If no visible emissions are observed during the semi-annual test for any PC MACT affected source, the frequency of Method 22 testing may be decreased from semi-annually to annually for that PC MACT affected source.

- If visible emissions are observed during any semi-annual or annual test, visible emissions observations of that PC MACT affected source must resume on a monthly basis and maintain that schedule until no visible emissions are observed in six consecutive monthly tests.

Visible emissions monitoring will not be conducted for totally enclosed conveying system transfer points (i.e., transfer points that are enclosed on all sides, top, and bottom). Buildings containing partially enclosed or unenclosed conveying system transfer points will be subjected to visible emissions monitoring conducted as previously described. However, emissions from each side, roof, and vent of the building will be evaluated in lieu of the individual transfer points. In addition, if several PC MACT affected sources are controlled by a single pollution control device, monitoring at the outlet of the device will demonstrate compliance for all covered sources.

5.2 Finish Mills

5.2.1 Opacity

The visual emissions observation monitoring procedures provided in this section are applicable to the finish mills and were developed to satisfy the requirements of 40 CFR 63.1350(f)(2). Opacity (i.e., visual emissions) is measured at the finish mill sweep and air separator dust collector stacks using EPA Method 22 of Appendix A to 40 CFR Part 60 and Method 9 of Appendix A to 40 CFR Part 60, visible emission evaluation methods. Method 22 and Method 9 evaluations are conducted as described below.

- Conduct a daily 6-minute Method 22 visual emissions observation of the mill sweep and air separator baghouses each day the affected source is in operation.

- If visible emissions are observed, initiate corrective actions within 1-hour. Subsequently, within 24-hours of the end of the Method 22 test in which visible emissions were observed, conduct a follow-up 6-minute Method 22 test of each stack

from which visible emissions were observed during the previous 6-minute Method 22 test.

- If visible emissions are observed during the follow-up Method 22 test, conduct a 30-minute Method 9 test within 1-hour.

5.3 PH/PC Kiln System

The monitoring procedures outlined below are consistent with 40 CFR 63 Subpart A and the PC MACT Final Rule.

5.3.1 Continuous Parameter Monitoring System – PM

As required by 40 CFR 63.1350(b)(1), a continuous parameter monitoring system (CPMS) for PM is used as an indicator of compliance with the PM standard for the PH/PC Kiln System. The CPMS is calibrated, operated, and maintained in accordance with the provisions of 40 CFR Part 63 Subpart A and the PC MACT Final Rule.

5.3.2 Temperature Monitor - Dioxin/Furan

As required by 40 CFR 63.1350(g)(1), a continuous monitor must be installed, calibrated, maintained, and continuously operated to record the temperature of kiln exhaust gases at the inlet to the Main Kiln Baghouse. The following guidelines should be adhered to when determining compliance with the temperature limit (3-hour rolling average) on the kiln exhaust gases at the inlet to the Main Kiln Baghouse:

(1) The recorder response range must include zero and 1.5 times either of the average temperatures established according to the requirements in 40 CFR 63.1349(b)(3)(iv).

(2) The calibration reference method must be a National Institute of Standards and Technology (NIST) calibrated reference thermocouple-potentiometer system.

(3) The three-hour rolling average is calculated as the average of 180 successive one-minute average temperatures.

(4) Periods of time when 1-minute averages are not available are ignored when calculating 3-hour rolling averages. When 1-minute averages become available, the first 1-minute average is added to the previous 179 values to calculate the 3-hour rolling average.

(5) Calibration of the thermocouple used to monitor compliance with the PC MACT Final Rule operating limits must be verified at least once every three months.

As a parametric monitoring system parameter for compliance with the D/F limit, the temperature of the kiln system exhaust gases at the inlet to the Main Kiln Baghouse is limited according to the average of the run average temperatures measured during the most recent performance test conducted in accordance with 40 CFR 63.1349(b)(3). This performance testing must be repeated every 30 months using Method 23.

During performance testing, temperature limits are established. Compliance with the temperature limits are based on a three-hour rolling average temperature using 180 successive one-minute averages.

5.3.3 HCl CEMS

The Main Kiln Stack will be equipped with an HCl CEMS for the continuous monitoring of HCl emissions per the PC MACT procedures and requirements stipulated in per 40 CFR 63.1350(l).

5.3.4 Hg CEMS

The Main Kiln Stack will be equipped with an Hg CEMS for the continuous monitoring of Hg emissions per the PC MACT procedures and requirements stipulated in per 40 CFR 63.1350(k).

5.3.5 THC CEMS

The Main Kiln Stack will be equipped with an THC CEMS for the continuous monitoring of THC emissions per the PC MACT procedures and requirements stipulated in per 40 CFR 63.1350(i).

5.3.6 Other Parameters

The Main Kiln Stack will monitor stack volumetric flow rate performed in accordance with 40 CFR 63.1350(n) and will also monitor oxygen since the PC MACT emission limits for THC and HCl need to be corrected to 7 percent oxygen.

The moisture content contained in the kiln exhaust stack will be determined using site specific stack moisture content data taken from past Plant stack tests which utilized U. S. EPA Test Method 4, "Determination of Moisture Content in Stack Gases" (40 CFR 60 Appendix A-3). Appropriate moisture corrections need to be made per 40 CFR 63.1343(a) when measuring dry volumetric flow rate that is used when calculating the Hg emission rate.

Hourly clinker production will also be monitored per 40 CFR 63.1348(b)(1)(iv) and calculated in accordance with the methodology of 40 CFR 63.1350(d)(1)(ii).

5.4 Clinker Cooler

5.4.1 Continuous Parameter Monitoring System – PM

As required by 40 CFR 63.1350(b)(1), a continuous parameter monitoring system (CPMS) for PM is used as an indicator of compliance with the PM standard for the Clinker Cooler Stacks. The CPMS is calibrated, operated, and maintained in accordance with the provisions of 40 CFR Part 63 Subpart A and the PC MACT Final Rule.

6.0 CORRECTIVE ACTION MEASURES

As required by 40 CFR 63.1347(a)(2), this section provides procedures for corrective actions to be taken pursuant to 40 CFR 63.1350(f)(3) in the event that visible emissions are observed during any Method 22 visible emissions test.

6.1 Finish Mills

If visible emissions are observed during Method 22 testing of Plant finish mill sources (i.e., mill sweep and/or air separator particulate control devices), the following steps will be taken, as appropriate.

- Within one hour, the appropriate corrective action will be taken in accordance with the operation, maintenance, and inspection procedures described in this O&M Plan for raw and finish mill sources.

- Within 24 hours of the end of the Method 22 test in which visible emissions were observed, conduct a follow-up Method 22 test of each stack from which visible emissions were observed during the previous Method 22 test.

- If visible emissions are observed during the follow up Method 22 test from any stack from which visible emissions were observed during the previous Method 22 test, conduct a visual opacity test of each stack from which emissions were observed during the follow up Method 22 test, in accordance with Method 9 of Appendix A of 40 CFR Part 60. The duration of the Method 9 test will be 30 minutes.

- If emissions exceed 10% opacity, a work order will be written to perform maintenance and/or equipment modifications as necessary to ensure that emissions return to and remain at levels below 10% opacity.

6.2 Material Handling Points

If visible emissions are observed during Method 22 testing of any material handling points, the following steps will be taken, as appropriate.

- Within one hour, the appropriate corrective action will be taken in accordance with the operation, maintenance, and inspection procedures described in this O&M Plan for the applicable material handling point.

- The Plant will conduct 30 minutes of opacity observations, recorded at 15-second intervals, in accordance with Method 9 as specified in 40 CFR 60 Appendix A-4. The Method 9 performance test will begin within 1 hour of any observation of visible emissions.

- If the results of the Method 9 visible emissions observations indicate that the 10% opacity threshold is exceeded, this will be noted in the plant environmental records. Plans will be developed and a work order will be written to perform maintenance and/or equipment modifications as necessary to ensure that emissions return to and remain at levels below 10% opacity.

7.0 INSPECTION PROGRAM

The inspection program addresses the inspection and maintenance of equipment critical to facility compliance with applicable PC MACT standards. This section sets forth the inspection procedures and schedules for PC MACT affected equipment. Sample inspection documentation forms are included as Attachment B.

7.1 Weigh Feeders

Equipment Locations: Kiln feed building, mill building

Equipment: Weigh feeder housing and dust abatement connection.

Inspection Procedure/Frequency: Inspect the weigh belt housing and dust abatement connection, for holes and openings, which would prevent the dust abatement device from controlling the dust below permit limits. (Annually)

7.2 Belt Conveyor Transfer Points

Equipment Locations: Mill building, Kiln feed building

Equipment: Drop chutes, enclosures and skirting.

Inspection Procedure/Frequency: Inspect drop chutes, enclosures and skirting for holes and openings, which would prevent the dust abatement device from controlling the dust below permit limits. (Quarterly)

7.3 Screw Conveyor Transfer Points

Equipment Locations: Mill building, finish silos, raw silos, Main Kiln Baghouse, and clinker cooler dust collectors

Equipment: Screw conveyor housing, cover and drop chutes.

Inspection Procedure/Frequency: Inspect screw conveyor housing, cover and drop chutes for holes and openings, which would prevent the dust abatement device from controlling the dust below permit limits. (Quarterly)

7.4 Pneumatic Equipment

Equipment Locations: Mill building, raw silos, cement cooler building, kiln feed building and finish silos.

Equipment: Pump feed hopper housing, transfer pump, and transfer pipe lines.

Inspection Procedure/Frequency: Inspect pump feed hopper housing, transfer pump and transfer pipe lines for holes and openings, which would prevent the dust abatement device from controlling the dust below permit limits. (Quarterly)

7.5 Dust Collectors

Equipment Locations: Main Kiln Baghouse, clinker cooler dust collectors, mill building, raw silos, finish silos, packhouse and truck loading station.

Equipment: Dust collector structure, hoppers, dust collector bags; PLC cleaning cycle, duct work, duct work connections, and the fan wheel.

Inspection Procedure/Frequency: Inspect the dust collector structure, hoppers, dust collector bags, duct work, duct work connections, and bag attachment structure for holes and openings, which would prevent the dust abatement device from controlling the dust below permit limits. Inspect the cleaning cycle settings to ensure they are consistent with good operating practices for these devices. Inspect the fan wheel for undue wear, which would prevent the fan from moving enough air to collect PM with the associated dust collector. (Annually)

7.6 Air Slides

Equipment Locations: Raw silos, truck loading station, and cement cooler building.

Equipment: Air slide housing, cover and dust collector connections.

Inspection Procedure/Frequency: Inspect air slide housing, cover and dust collector connections for holes and openings, which would prevent the dust abatement device from controlling the dust below permit limits. (Annually)

7.7 Fuel Blend Conveyance System

Equipment Locations: Fuel Prep Building.

Equipment: Coal pipe and drop chute.

Inspection Procedure/Frequency: Inspect coal pipe and drop chute for holes and openings, which would allow the coal pipe and/or drop chute to emit dust in excess of permit limits. (Annually)

7.8 Water Spray System

Equipment Locations: Preheater tower.

Equipment: Spray nozzles, pumps, supply piping, and flow controller.

Inspection Procedure/Frequency: Inspect the components of the water spray system including pumps, supply piping and spray nozzles for damage and leaks, which would prevent the water sprays to adequately cooling the air to the dust collector. (Quarterly) Inspect the flow controller for adequate operation to assist in controlling the air temperature to the dust collector. (Annually)

7.9 Bucket Elevator Transfer Points

Equipment Locations: Mill building, raw silos, kiln feed building and clinker cooler dust collectors.

Equipment: Bucket elevator housing and drop chutes.

Equipment Procedure/Frequency: Inspect bucket elevator housing and drop chutes for holes and openings, which would prevent the dust abatement device from controlling the dust below permit limits. (Semi-annually)

7.10 Drag Conveyor Transfer Points

Equipment Locations: Mill building

Equipment: Drag conveyor housings, covers and drop chutes.

Equipment Procedure/Frequency: Inspect drag conveyor housing, cover and drop chutes for holes and openings, which would prevent

the dust abatement device from controlling the dust below permit limits. (Semi-annually)

7.11 Tempering Air Dampers

Equipment Locations: Preheater Tower

Equipment: Tempering air dampers.

Equipment Procedure/Frequency: Inspect tempering air dampers for adequate operation to assist in controlling the air temperature to the dust collector. (Annually)

7.12 Emergency Air Dampers

Equipment Locations: Preheater Tower

Equipment: Emergency air dampers.

Equipment Procedure/Frequency: Inspect emergency air dampers for adequate operation to assist in controlling the air temperature to the dust collector. (Annually)

8.0 RECORDKEEPING REQUIREMENTS

Appropriate records of the operating, maintenance, monitoring and inspection activities conducted pursuant to this O&M Plan will be maintained on file at the Plant in accordance with 40 CFR 63.1355. The relevant files will be recorded in a suitable form and readily available for inspection and review as required by 40 CFR 63.10(b)(1). The files shall be retained for at least five years following the date of each occurrence, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained onsite. The remaining three years of data may be retained offsite.

9.0 PH/PC KILN SYSTEM STARTUP AND SHUTDOWN PROCEDURES

9.1 Regulatory Applicability

The definitions of startup and shutdown per 40 CFR 63.1341 are as follows:

Startup means the time from when a shutdown kiln first begins firing fuel until it begins producing clinker. Startup begins when a shutdown kiln turns on the induced draft fan and begins firing fuel in the main burner. Startup ends when feed is being continuously introduced into the kiln for at least 120 minutes or when the feed rate exceeds 60 percent of the kiln design limitation rate, whichever occurs first.

Shutdown means the cessation of kiln operation. Shutdown begins when feed to the kiln is halted and ends when continuous kiln rotation ceases.

The Plant will meet the requirements of 40 CFR 63.1346(g) where:

(1) During startup, the Plant can potentially use any one or a combination of the following clean fuels: natural gas, synthetic natural gas, propane, distillate oil, synthesis gas (syngas), and ultra-low sulfur diesel (ULSD) until the kiln reaches a temperature of 1,200 degrees Fahrenheit.

(2) Combustion of the primary kiln fuel may commence once the kiln temperature reaches 1,200 degrees Fahrenheit.

(3) All air pollution control devices must be turned on and operating prior to combusting any fuel.

(4) The Plant will keep records as specified in 40 CFR 63.1355 during periods of startup and shutdown.

The Plant will perform continuous compliance by operating all air pollution control devices during periods of startup and shutdown per 40 CFR 63.1348(b)(9).

9.2 Cement Kiln System Startup Procedures

Startup of the PH/PC Kiln System is performed in stages. These stages include 1) Air Pollution Control Device (APCD) startup; 2) preheat; and 3) kiln feed and fuel feed ramp up.

Per 40 CFR 63.1346(g), the Main Kiln Baghouse (APCD) associated with the PH/PC Kiln System must be operating prior to combusting any fuel. Preheating begins by initiating the burning of a clean fuel (i.e., natural gas) in the PH/PC kiln burner hood. The PH/PC Kiln System temperature is monitored via the PH/PC kiln inlet thermocouple. Once the appropriate temperature is achieved, the primary PH/PC kiln fuel can be introduced into the PH/PC Kiln System. After a predetermined warm-up period the kiln feed is introduced to the top of the preheater tower. Once the PH/PC kiln burning zone has been established, additional fuels can be introduced into the PH/PC kiln to begin elevating the system to operational temperatures. Adjustments to the induced draft fan are started in conjunction with the additional fuel input to provide adequate oxygen for its proper combustion. Fuel can then be introduced into the precalciner to drive the preheating process for the tower. The PH/PC kiln feed is ramped up slowly and fuel is added as appropriate to maintain proper combustion and temperature profiles. Once the PH/PC kiln feed rate is at 60 percent of the maximum design rate, the startup procedure is considered complete. Kiln feed and fuel continue to be ramped up until desired process feed rates are reached.

9.3 Cement Kiln System Shutdown Procedures

In general, the PH/PC Kiln System shutdown procedures are the startup procedures in reverse order. Once the decision is made to shut the PH/PC Kiln System down, the fuel and kiln feed input rates are gradually decreased until the production rate has reduced below 60 percent of the maximum design value. At this point, the kiln feed and fuel inputs are stopped. Operation of the preheater tower is continued until all raw materials drop from the vessels into the PH/PC kiln portion of the system. Rotation of the PH/PC kiln is continued until the temperature of any materials in the PH/PC kiln has decreased to the point that the PH/PC kiln shell will not sustain heat damage if the PH/PC kiln is stopped and materials are allowed to remain in the PH/PC kiln. At this point, shutdown is considered complete, and the Main Kiln Baghouse can be shut down. In the event the PH/PC kiln is to be emptied of all raw materials (where the PH/PC kiln is rotated

until empty), the Main Kiln Baghouse cannot be shut down until this operation has completed and the PH/PC kiln has been stopped.

ATTACHMENT A

PC MACT AFFECTED SOURCE DETERMINATION TABLE

PC MACT AFFECTED SOURCE DETERMINATION TABLE

FIN	EPN	CIN	Source Description	Type	PC MACT Affected Source?
A-1	F-A-1		Blasting Hole Drill Fugitives	Blasting Fugitive	NO
A-3	F-A-3	C-A-3	Quarry Loader Road Emissions	Unpaved Road	NO
A-8	F-A-8		Quarry Loader Drop to Truck	Fugitive	NO
A-10	F-A-10		Blasting	Blasting Fugitive	NO
A-12	F-A-12	C-A-12	Coal Storage Piles	Storage Pile	NO
A-13	F-A-13	C-A-13	Coke Storage Piles	Storage Pile	NO
A-14	F-A-14	C-A-14	Gypsum/Anhydrite Pile	Storage Pile	NO
A-15	F-A-15	C-A-15	Limestone Pile	Storage Pile	NO
A-23	F-A-23	C-A-23	Raw Material Deliveries Road Emissions	Paved Road	NO
A-24	F-A-24	C-A-24	Fuel Deliveries Road Emissions	Paved Road	NO
A-25	F-A-25	C-A-25	Limestone Truck Dump to Hopper	Fugitive	NO
A-26	S-A-26	C-A-26	Limestone Hopper, Primary Crushing, and Conveying	Baghouse	NO
A-27	S-A-27	C-A-27	Limestone Conveying and Screening to Overland Conveyor	Baghouse	NO
A-28	S-A-28	C-A-28	Overland Conveyor Transfer to Raw Material Storage	Baghouse	YES
A-29	S-A-29	C-A-29	Transfer to Limestone Pile in Raw Material Storage Building North	Baghouse	YES
A-30	S-A-30	C-A-30	Transfer to Limestone Pile in Raw Material Storage Building South	Baghouse	YES
A-31	S-A-31	C-A-31	Limestone Pile Reclaim to Belt 222017	Baghouse	YES
A-32	S-A-32	C-A-32	Transfer to Limestone Bin	Baghouse	YES
A-33	F-A-33	C-A-33	Raw Material Truck Dump to Additive Hopper	Fugitive	YES
A-34	F-A-34	C-A-34	Clay and Additives Transfer from Hopper to Belt Conveyor 213020	Fugitive	YES
A-35	S-A-35	C-A-35	Raw Material Conveying to Clay Bins ; Clay Bin Weigh Feeders to Belt 222146	Baghouse	YES
A-36	S-A-36	C-A-36	Belt Conveyor 213020 to Sand/Iron Ore/Alumina Bins	Baghouse	YES
A-37	S-A-37	C-A-37	Sand/Iron Ore/Alumina/Clay Weigh Feeders to Belt 222150	Baghouse	YES

PC MACT AFFECTED SOURCE DETERMINATION TABLE

FIN	EPN	CIN	Source Description	Type	PC MACT Affected Source?
A-38	S-A-38	C-A-38	Limestone and Raw Material Transfer from Belt 222150 to Belt 222170	Baghouse	YES
B-12	S-B-12	C-B-12	BTM Raw Silo, North	Baghouse	YES
B-13	S-B-13	C-B-13	BTM Raw Silo, Center	Baghouse	YES
B-14	S-B-14	C-B-14	BTM Raw Silo, South	Baghouse	YES
B-15	S-B-15	S-B-15	FM #7 Discharge from Finish Tunnel to Elevator 509545 To Belt 509560	Baghouse	YES
B-17	S-B-17	C-B-17	Raw Mill Conveying	Baghouse	YES
B-18	S-B-18	C-B-18	Raw Mill to Belt 241635	Baghouse	YES
B-19	S-B-19	C-B-19	Raw Mill to Belt 241400 to Elevator 241415 to Belt 241420	Baghouse	YES
B-20	S-B-20	C-B-20	Belt 241420 Transfer to Belt 241421	Baghouse	YES
B-21	S-B-21	C-B-21	Belt 241421 Conveying to Raw Silos	Baghouse	YES
B-22	S-B-22	C-B-22	Belt 241421 to Raw Silos Elevator 241436	Baghouse	YES
B-23	S-B-23	C-B-23	Raw Silos Elevator 241436 to Belt 241437 and Airslides to Silos	Baghouse	YES
B-24	S-B-24	C-B-24	Raw Silos Airslides West	Baghouse	YES
B-25	S-B-25	C-B-25	Raw Silos Airslides Middle	Baghouse	YES
B-26	S-B-26	C-B-26	Raw Silos Airslides East	Baghouse	YES
B-27	S-B-27	C-B-27	Kiln Feed from Raw Silos Belt 241585 to Belt 241600	Baghouse	YES
B-28	S-B-28	C-B-28	Belt 241600 to Bucket Elevator 241820 to Belt 241635	Baghouse	YES
B-29	S-B-29	C-B-29	Kiln Feed Conveying from Raw Silos on Belt 241635	Baghouse	YES
B-30	F-B-30	-	Transfer to Reject Bin	Fugitive	YES
B-31	F-B-31	-	Reject Bin Loadout to Truck	Fugitive	YES
B-32	F-B-32	C-B-32	Reject Material Road Emissions	Unpaved Road	NO
B-33	F-B-33	-	Reject Materials Landfill Pile	Pile	NO
B-4	S-B-4	C-B-4	Raw Silo Elevator	Baghouse	YES
B-7	S-B-7	S-B-7	FM#7 Conveying - Belt 509560 to 509565 to 509575	Baghouse	YES
C-31	S-C-31	C-C-31	Clinker Cooler Baghouse #1	Baghouse	YES
C-32	S-C-32	C-C-32	Clinker Cooler Baghouse #2	Baghouse	YES
C-33A	S-C-33	C-C-33	Clinker Cooler Baghouse #3	Baghouse	YES

PC MACT AFFECTED SOURCE DETERMINATION TABLE

FIN	EPN	CIN	Source Description	Type	PC MACT Affected Source?
C-34	S-C-34	C-C-34	Kiln Feed Bin and Conveying to Elevator 241720	Baghouse	YES
C-35	S-C-35	C-C-35	Kiln Feed Bucket Elevator 241720 to Belt 241725 to Kiln	Baghouse	YES
C-36	S-C-36	C-C-36	Preheater/Precalciner Kiln and Inline Raw Mill	Baghouse	YES
C-37	S-C-37	C-C-37	Clinker Cooler Transfer to Clinker Cooler Pan Conveyor 330500	Baghouse	YES
C-38	F-C-38	C-C-38	Ammonia Delivery Road Emissions	Paved Road	NO
C-39	S-C-39	C-C-39	Clinker Conveyor 330500 to Belt 330790, Belt 330770, or Upset Clinker Bin	Baghouse	YES
C-40	S-C-40	C-C-40	Clinker Conveyor 330500 to Elevator 330610 to Belts 330630/330640	Baghouse	YES
C-41	S-C-41	C-C-41	Belt 330630 to East Clinker Silo	Baghouse	YES
C-42	S-C-42	C-C-42	Belt 330640 to West Clinker Silo	Baghouse	YES
C-43	S-C-43	C-C-43	East Clinker Storage Silo Reclaim Belt 330670 to Elevator 330690	Baghouse	YES
C-44	S-C-44	C-C-44	West Clinker Storage Silo Reclaim Belt 330720 to Elevator 330740	Baghouse	YES
C-45	S-C-45	C-C-45	Clinker Elevators 330690/330740 to Belts 330790/330770	Baghouse	YES
C-46	S-C-46	C-C-46	Upset Clinker Bin	Baghouse	YES
C-47	S-C-47	C-C-47	Clinker Belt Conveyor 330790 (West)	Baghouse	YES
C-48	S-C-48	C-C-48	Clinker Belt Conveyor 330770 (East)	Baghouse	YES
C-49	S-C-49	C-C-49	Clinker Belt 330790 to Belt 330860 (West)	Baghouse	YES
C-50	S-C-50	C-C-50	Clinker Belt 330770 to Belt 330771 to Belt 330773 (East)	Baghouse	YES
C-51	F-C-51	C-C-51	Limestone Additive Road Emissions	Unpaved Road	NO
C-52	F-C-52	C-C-52	FM Additives Deliveries Road Emissions	Paved Road	NO
C-53	F-C-53	C-C-53	Gypsum/Anhydrite Transfer to Bins	Fugitive	YES
C-54	F-C-54	C-C-54	Limestone Transfer to Bins	Fugitive	YES
C-55	F-C-55	C-C-55	Off-Spec Clinker Pile	Pile	YES

PC MACT AFFECTED SOURCE DETERMINATION TABLE

FIN	EPN	CIN	Source Description	Type	PC MACT Affected Source?
C-56	F-C-56	C-C-56	Off-Spec Clinker Transfer to Bins	Fugitive	YES
C-57	S-C-57	C-C-57	Belt 330776 (East)/Belt 330860 (West) to Clinker/Additive Storage Building	Baghouse	YES
C-58	S-C-58	C-C-58	Bin #A - Main/Offspec Clinker	Baghouse	YES
C-59	S-C-59	C-C-59	Bin #B - Main/Offspec Clinker or Limestone	Baghouse	YES
C-60	S-C-60	C-C-60	Bins #C/D - Gypsum, Slag, or Limestone	Baghouse	YES
C-61	S-C-61	C-C-61	Bin #E - FM#6 Fast Track Feed Bin - Clinker/Limestone	Baghouse	YES
C-62	S-C-62	C-C-62	Bin #F - Main/Offspec Clinker	Baghouse	YES
C-63	S-C-63	C-C-63	Bin #G - Limestone/Offspec Clinker	Baghouse	YES
C-64	S-C-64	C-C-64	Bins #H/I - Gypsum, Slag, or Limestone	Baghouse	YES
C-65	S-C-65	C-C-65	Bin #J - Main Clinker	Baghouse	YES
C-66	S-C-66	C-C-66	Calcium Hydroxide Storage Tank	Baghouse	YES
C-67	F-C-67	C-C-67	Calcium Hydroxide Road Emissions	Paved Road	NO
D-14	S-D-14	C-D-14	South Drag Conveyor - Finish Tunnel	Baghouse	YES
D-19	S-D-19	C-D-19	North Drag Conveyor - Finish Tunnel	Baghouse	YES
D-20	S-D-20	C-D-20	FM #6 Discharge from Finish Tunnel to Bucket Elevator	Baghouse	YES
D-21	S-D-21	C-D-21	Finish Mill #6 Feed Belt	Baghouse	YES
D-22	S-D-22	C-D-22	Finish Mill #6 Separator	Baghouse	YES
D-23	S-D-23	C-D-23	FM #6 Air Slide Discharge to Cement Silos Bucket Elevator	Baghouse	YES
D-28	S-D-28	C-D-28	Belt 501058 Discharge to Bucket Elevator and FM #6 Air Slides	Baghouse	YES
D-29	S-D-29	C-D-29	FM #6 Air Slides to Westernmost Cement Silos	Baghouse	YES
D-30	S-D-30	C-D-30	FM #6 Air Slides to West Cement Silos	Baghouse	YES
D-31	S-D-31	C-D-31	FM #6 Air Slides to East Cement Silos	Baghouse	YES
D-32	S-D-32	C-D-32	Conveying from FM7 belt 530705 to FM6 Bucket Elevator	Baghouse	YES

PC MACT AFFECTED SOURCE DETERMINATION TABLE

FIN	EPN	CIN	Source Description	Type	PC MACT Affected Source?
D-33	S-D-33	C-D-33	FM #6 Airslides to East Cement Silos 13 to 15	Baghouse	YES
D-34	S-D-34	C-D-34	FM #6 Airslides to East Cement Silos 16 to 18	Baghouse	YES
D-36	S-D-36	C-D-36	West Cement Silos	Baghouse	YES
D-37	S-D-37	C-D-37	Westernmost Cement Silos Reclaim Belt 530222 #1	Baghouse	YES
D-38	S-D-38	C-D-38	Westernmost Cement Silos Reclaim Belt 530222 #2	Baghouse	YES
D-39	S-D-39	C-D-39	Westernmost Cement Silos Reclaim Belt 530222 #3	Baghouse	YES
D-40	S-D-40	C-D-40	West Cement Silos Reclaim Belt 530262 #1	Baghouse	YES
D-41	S-D-41	C-D-41	West Cement Silos Reclaim Belt 530262 #2	Baghouse	YES
D-42	S-D-42	C-D-42	West Cement Silos Reclaim Belt 530262 #3	Baghouse	YES
D-43	S-D-43	C-D-43	East Cement Silos Reclaim Belt 530306 #1	Baghouse	YES
D-44	S-D-44	C-D-44	East Cement Silos Reclaim Belt 530306 #2	Baghouse	YES
D-45	S-D-45	C-D-45	East Cement Silos Reclaim Belt 530306 #3	Baghouse	YES
D-46	S-D-46	C-D-46	Westernmost Cement Silos Belt 530222 To Bucket Elevator	Baghouse	YES
D-47	S-D-47	C-D-47	West Cement Silos Belt 530262 to Bucket Elevator	Baghouse	YES
D-48	S-D-48	C-D-48	East Cement Silos Reclaim Belt 530306 to Bucket Elevator	Baghouse	YES
D-49	S-D-22	C-D-22	Finish Mill #6 Air Heater	Baghouse	YES
D-5	S-D-5	C-D-5	Westernmost Cement Silos	Baghouse	YES
D-50	S-D-50	C-D-50	Belt 509575 to FM#7 and Belt 507200	Baghouse	YES
D-51	S-D-51	C-D-51	FM #7 Main Baghouse	Baghouse	YES
D-52	S-D-52	C-D-52	FM #7 Bucket Elevator 507150 to Air Separator	Baghouse	YES
D-53	S-D-53	C-D-53	FM #7 Air Separator	Baghouse	YES
D-54	S-D-54	C-D-54	FM #7 Off-Spec Bin	Baghouse	YES
D-55	S-D-55	C-D-55	FM #7 Air Slide to Cement Silos	Baghouse	YES
D-56	S-D-56	C-D-56	FM #7 Fly Ash Silo	Baghouse	YES
D-57	S-D-57	C-D-57	FM #7 Belt 530705 to Bucket Elevator 530710	Baghouse	YES
D-58	S-D-58	C-D-58	Bucket Elevator 530710 to Belt 530715 to Belt 530730	Baghouse	YES
D-59	S-D-59	C-D-59	Belt 530730 to Belts 530786/530756/530816	Baghouse	YES
D-6	S-D-6	C-D-6	East Cement Silos	Baghouse	YES

PC MACT AFFECTED SOURCE DETERMINATION TABLE

FIN	EPN	CIN	Source Description	Type	PC MACT Affected Source?
D-60	S-D-60	C-D-60	Belt 530786 to West Cement Silos 1 to 6	Baghouse	YES
D-61	S-D-61	C-D-61	Belt 530756 to West Cement Silos 7 to 12	Baghouse	YES
D-62	S-D-62	C-D-62	Belt 530816 to East Cement Silos	Baghouse	YES
D-63	S-D-63	C-D-63	FM #7 Airslides to East Cement Silos 13 to 15	Baghouse	YES
D-64	S-D-64	C-D-64	FM #7 Airslides to East Cement Silos 16 to 18	Baghouse	YES
D-7	S-D-7	C-D-7	Westernmost Masonry Cement Silo	Baghouse	YES
E-1	S-E-1	C-E-1	North End Truck Loadout Spout and Transport System	Baghouse	YES
E-26	F-E-26	C-E-26	Product Trucks Road Emissions	Paved Road	NO
E-27	S-E-27	C-E-27	Rail Loading Silo #1	Baghouse	YES
E-28	S-E-28	C-E-28	Rail Loading Silo #2	Baghouse	YES
E-29	S-E-29	C-E-29	Rail Loading Silo #1 Loadout	Baghouse	YES
E-30	S-E-30	C-E-30	Rail Loading Silo #2 Loadout	Baghouse	YES
E-33	S-E-33	C-E-33	Discharge to South End Truck Loading Bins	Baghouse	YES
E-34	S-E-34	C-E-34	South End Truck Loading Bins Loadout	Baghouse	YES
E-4	S-E-4	C-E-4	#1 Packing Machine	Baghouse	YES
E-5	S-E-5	C-E-5	#2 Packing Machine	Baghouse	YES
E-6	S-E-6	C-E-6	#3 Packing Machine	Baghouse	YES
E-7	S-E-7	C-E-7	#4 Packing Machine	Baghouse	YES
E-8	S-E-8	C-E-8	Discharge to North End Truck Loadout Bins	Baghouse	YES
E-9	S-E-9	C-E-9	Discharge to North End Truck Loadout Bins	Baghouse	YES
G-2	S-G-2	C-G-2	Existing Solid Fuel Silo - Coal (East Silo)	Baghouse	NO
G-20	F-G-20	C-G-20	Coal Return Belt Transfer Drop	Fugitive	NO
G-21	F-G-21	C-G-21	Coal Loader Drop to Hopper (NOTE 1)	Fugitive	NO
G-23	F-G-23	C-G-23	Coal Silos Feeders Drop to Belt	Fugitive	NO
G-24	F-G-24	C-G-24	Coal Hopper Drop to Belt (NOTE 1)	Fugitive	NO
G-25	S-G-25	C-G-25	Carbon Black Silo	Baghouse	YES
G-26	S-G-26	C-G-26	Coal/Coke Conveying to Screen	Baghouse	NO
G-27	S-G-27	C-G-27	Coal/Coke Crusher	Baghouse	NO

PC MACT AFFECTED SOURCE DETERMINATION TABLE

FIN	EPN	CIN	Source Description	Type	PC MACT Affected Source?
G-28	S-G-28	C-G-28	Coal/Coke Screening and Conveying	Baghouse	NO
G-29	F-G-29	C-G-29	Coal/Coke Conveyor 355250 to 355310	Fugitive	NO
G-3	S-G-3	C-G-3	Existing Solid Fuel Silo - Coke (West Silo)	Baghouse	NO
G-30	F-G-30	C-G-30	Coal/Coke Conveyor 355310 to Ball Mill	Fugitive	NO
G-31	S-G-31	C-G-31	Coal/Coke Ball Mill	Baghouse	YES
G-32	S-G-32	C-G-32	Pulverized Coal/Coke Bins	Baghouse	YES
G-33	F-G-33	C-G-33	Alternate Fuel Storage Building	Pile	NO
G-34	F-G-34	C-G-34	Alternate Fuel to Day Storage Road Emissions	Paved Road	NO
G-35	F-G-35	C-G-35	Day Storage Alternate Fuel Pile	Pile	NO
G-36	F-G-36	C-G-36	Dump to Alternate Fuel Hopper	Fugitive	YES
G-37	F-G-37	C-G-37	Hopper to Conveyor/Weighfeeder	Fugitive	YES
G-7	F-G-7	C-G-7	Rail Car Drop to Coal System Hopper	Fugitive	NO
G-8	F-G-8	C-G-8	Rail Feeder Drop to Coal Belt	Fugitive	NO
M-1	F-M-1	C-M-1	Quarry Trucks Road Emissions	Unpaved Road	NO
L-47	L-47		Gasoline Tank	Tank	NO
L-49	L-49		Diesel Shipping Tank	Tank	NO
L-48	L-48		Quarry Diesel Tank	Tank	NO
L-53	L-53		Quarry Vehicle Diesel Tank	Tank	NO

ATTACHMENT B

INSPECTION FORMS

PC MACT INSPECTION - DUST COLLECTORS

INSPECT FOR HOLES AND OPENINGS WHICH WOULD PREVENT THE DUST ABATEMENT DEVICE FROM CONTROLLING THE DUST BELOW PERMIT LIMITS, ALSO INSPECT THE CLEANING CYCLE SETTINGS TO ENSURE THEY PROVIDE ADEQUATE OPERATION FOR THE DUST ABATEMENT DEVICE.

1. INSPECT DUST COLLECTOR STRUCTURE.____

2. INSPECT HOPPERS.____

3. INSPECT DUST COLLECTOR BAGS.____

4. INSPECT DUCT-WORK.____

5. INSPECT DUST COLLECTOR CONNECTIONS.____

6. INSPECT DUST COLLECTOR BAG ATTACHMENT STRUCTURE.____

7. INSPECT CLEANING CYCLE SETTINGS.____

8. REPAIR ALL HOLES AND OPENINGS FOUND DURING INSPECTION.____

ATTACHMENT B

INSPECTION FORMS

PC MACT INSPECTION - BELT CONVEYOR TRANSFER POINTS

INSPECT FOR HOLES AND OPENINGS WHICH WOULD PREVENT THE DUST ABATEMENT DEVICE FROM CONTROLLING THE DUST BELOW PERMIT LIMITS.

1. INSPECT DROP CHUTES.____

2. INSPECT ENCLOSURES.____

3. INSPECT SKIRTING.____

4. REPAIR ALL HOLES AND OPENINGS FOUND DURING INSPECTION.____

ATTACHMENT B

INSPECTION FORMS

PC MACT INSPECTION - TEMPERING AIR DAMPERS

INSPECT TEMPERING AIR DAMPERS FOR ADEQUATE OPERATION TO ASSIST IN CONTROLLING THE KILN EXHAUST GAS TEMPERATURE TO THE DUST COLLECTOR.

1. INSPECT TEMPERING AIR DAMPER._____

2. REPAIR ALL PROBLEM ITEMS FOUND DURING INSPECTION._____

PC MACT INSPECTION - AIR SLIDES

INSPECT FOR HOLES AND OPENINGS WHICH WOULD PREVENT THE DUST ABATEMENT DEVICE FROM CONTROLLING THE DUST BELOW PERMIT LIMITS.

1. INSPECT AIR SLIDE HOUSING._____

2. INSPECT COVER._____

3. INSPECT DUST COLLECTOR CONNECTIONS._____

4. REPAIR ALL HOLES AND OPENINGS FOUND DURING INSPECTION._____

ATTACHMENT B

INSPECTION FORMS

PC MACT INSPECTION - COAL CONVEYANCE SYSTEM

INSPECT FOR HOLES AND OPENINGS WHICH WOULD ALLOW THE COAL PIPE AND/OR DROP CHUTE TO EMIT DUST IN EXCESS OF PERMIT LIMIT.

1. INSPECT COAL PIPE._____

2. INSPECT DROP CHUTES._____

3. REPAIR ALL HOLES AND OPENINGS FOUND DURING INSPECTION._____

ATTACHMENT B

INSPECTION FORMS

PC MACT INSPECTION - DRAG CONVEYOR TRANSFER POINTS

INSPECT FOR HOLES AND OPENINGS WHICH WOULD PREVENT THE DUST ABATEMENT DEVICE FROM CONTROLLING THE DUST BELOW PERMIT LIMITS.

1. INSPECT DRAG CONVEYOR HOUSING._____

2. INSPECT COVER._____

3. INSPECT DROP CHUTES._____

4. INSPECT DUST COLLECTOR CONNECTIONS._____

5. REPAIR ALL HOLES AND OPENINGS FOUND DURING INSPECTION._____

ATTACHMENT B

INSPECTION FORMS

PC MACT INSPECTION - BUCKET ELEVATOR TRANSFER POINTS

INSPECT FOR HOLES AND OPENINGS WHICH WOULD PREVENT THE DUST ABATEMENT DEVICE FROM CONTROLLING THE DUST BELOW PERMIT LIMITS.

1. INSPECT BUCKET ELEVATOR HOUSING.____

2. INSPECT DROP CHUTES.____

3. INSPECT DUST COLLECTOR CONNECTIONS.____

4. REPAIR ALL HOLES AND OPENINGS FOUND DURING INSPECTION.____

ATTACHMENT B

INSPECTION FORMS

PC MACT INSPECTION - PNEUMATIC EQUIPMENT

INSPECT FOR HOLES AND OPENINGS WHICH WOULD PREVENT THE DUST ABATEMENT DEVICE FROM CONTROLLING THE DUST BELOW PERMIT LIMITS.

1. INSPECT PUMP FEED HOPPER._____

2. INSPECT PUMP._____

3. INSPECT PNEUMATIC PIPE LINES._____

4. REPAIR ALL HOLES AND OPENINGS FOUND DURING INSPECTION._____

ATTACHMENT B

INSPECTION FORMS

PC MACT INSPECTION - SCREW CONVEYOR TRANSFER POINTS

INSPECT FOR HOLES AND OPENINGS WHICH WOULD PREVENT THE DUST ABATEMENT DEVICE FROM CONTROLLING THE DUST BELOW PERMIT LIMITS.

1. INSPECT SCREW CONVEYOR HOUSING.____

2. INSPECT COVERS.____

3. INSPECT DROP CHUTES.____

4. REPAIR ALL HOLES AND OPENINGS FOUND DURING INSPECTION.____

ATTACHMENT B

INSPECTION FORMS

PC MACT INSPECTION – WATER SPRAY SYSTEM

INSPECT THE COMPONENTS OF THE WATER SPRAY SYSTEM FOR DAMAGE OR LEAKS THAT WOULD PREVENT IT FROM COOLING THE KILN EXHAUST GASES BEFORE THEY ENTER THE DUST COLLECTOR.

1. INSPECT PUMPS FOR DAMAGE OR LEAKS.
2. INSPECT WATER AND AIR PIPING FOR DAMAGE OR LEAKS.
3. INSPECT EACH SPRAY LANCE FOR DAMAGE OR LEAKS.
4. INSPECT EACH NOZZLE FOR WEAR, OBSTRUCTIONS OR DAMAGE.

ATTACHMENT B

INSPECTION FORMS

PC MACT INSPECTION – WATER SPRAY FLOW CONTROLLER

INSPECT THE COMPONENTS OF THE WATER SPRAY FLOW CONTROLLER FOR ADEQUATE OPERATION TO COOL THE KILN EXHAUST GASES BEFORE THEY ENTER THE DUST COLLECTOR.

1. VERIFY THAT PRESSURE TRANSDUCERS ARE ZEROED.
2. VERIFY PROPER STROKING OF THE WATER FLOW CONTROL VALVE.
3. VERIFY PROPER STROKING OF THE AIR CONTROL VALVE
4. INSPECT THE OPERATION OF THE BACKPRESSURE-REGULATING VALVE.
5. INSPECT THE FLOWMETER ZERO AND SPAN.

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