

EASTERN KERN AIR POLLUTION CONTROL DISTRICT



**PREVENTION OF
SIGNIFICANT
DETERIORATION
PERMIT**

2700 "M" Street, Suite 302
Bakersfield, CA 93301-2370
(661) 862-5250

Permittee: CALIFORNIA PORTLAND CEMENT COMPANY

Location: 9350 Oak Creek Road
Mojave, California 93501-7738

Permit No: PSD #220121

Issuance Date: XXXX XX, 2022

Nature of Business: Producer of Portland Cement

This permit is issued pursuant to and is conditioned upon compliance with provisions of the Eastern Kern Air Pollution Control District Rules and Regulations as authorized by the California Health and Safety Code, Section 39002. This permit is subject to accuracy of all information submitted relating to the permit application and to conditions appended hereto. This permit is valid so long as construction commences within 18 months from date of issuance and is not discontinued for a period of 18 months or more. This permit shall be made readily available for inspection at any reasonable time to any and all persons who may request to see it.

Pursuant to the Clean Air Act Amendments of 1990 (CAAA), all conditions of this permit are federally enforceable by U.S. EPA and Eastern Kern Air Pollution Control District (District).

By:

Glen Stephens, P.E.
Air Pollution Control Officer

I. Notification of Commencement of Construction and Startup

The District shall be notified in writing of the anticipated date of initial startup of the source not more than sixty (60) days nor less than thirty (30) days prior to such date and shall be notified in writing of the actual date of commencement of construction and startup within fifteen (15) days after such date.

II. Facilities Operation

All equipment, facilities, and systems installed or used to achieve compliance with the terms and conditions of approval to Construct/Modify shall at all times be maintained in good/working order and be operated as efficiently as possible so as to minimize air pollutant emissions

III. Malfunction

The District shall be notified by telephone within 48 hours following and failure of air pollution control equipment, process equipment, or of a process to operate in a normal manner which results in an increase in emissions above any allowable emissions limit stated in Section VIII of these conditions. In addition, the District shall be notified in writing within fifteen (15) days of any such failure. This notification shall include a description of the malfunctioning equipment or abnormal operation, the date of the initial failure, the period of time over which emissions were increased due to the failure the cause of the failure, the estimated resultant emissions in excess of those allowed under Section VIII of these conditions, and the methods utilized to restore normal operations. Compliance with this malfunction notification shall not excuse or otherwise constitute a defense to any violations of this permit or of any law or regulations which such malfunction may cause.

IV. Right to Entry

The Air Pollution Control Officer of the District, EPA Regional Administrator, or the Executive Officer of the California Air Resources Board, and/or their authorized representative, upon presentation of credentials, shall be permitted:

- A. to enter the premises where the source is located or in which any records are required to be kept under the terms and conditions of this Approval to Construct/Modify; and
- B. at reasonable times to have access to and copy any records required to be kept under the terms and conditions of the Approval to Construct/Modify; and
- C. to inspect any equipment, operation, or method required in this Approval to Construct/Modify; and
- D. to sample emissions from the source

V. Transfer of Ownership

In the event of any changes in control or ownership of facilities to be constructed or modified, this approval to Construct/Modify shall be binding on all subsequent owners and operators. The applicant shall notify the succeeding owner and operator of the existence of this Approval to Construct/Modify

and its conditions by letter, a copy of which shall be forwarded to the EPA Regional Administrator, the California Air Resources Board, and the District.

VI. Severability

The provisions of this Approval to Construct/Modify are able, and if any provision of this Approval to Construct/Modify is held invalid, the remainder of this Approval to Construct/Modify shall not be affected thereby.

VII. Other Applicable Requirements

The owner and operator of the proposed project shall construct and operate the proposed stationary source in compliance with all other applicable provisions of 40 CFR Parts 52, 60, 61, and 63 and all other applicable federal, state, and local air quality regulations.

VIII. Special Conditions -

A. Performance Tests:

1. California Portland Cement Company shall conduct performance tests for CO in conjunction with the annual testing performed for the Eastern Kern Air Pollution Control District Permit and at such other times as specified by the District or the EPA. California Portland Cement Company shall furnish the District and EPA a written report of the results of such tests. The tests for CO shall be conducted on an annual basis and at the maximum operating capacity of the facilities being tested. Upon written request from California Portland Cement Company, the District may approve the conducting of performance test at a lower specified production rate. After initial performance tests and upon written request and adequate justification from California Portland Cement Company, the EPA may waive a specified annual test for the facility.
2. Performance tests for the emissions of CO shall be conducted and the results reported in accordance with the test methods set forth in 40 CFR 60, Part 60.8 and Appendix A. Performance tests for the emissions of CO shall be conducted using EPA Methods 1-4 and 10.

The District and the EPA (Attn: AIR-3) shall be notified in writing at least 30 days prior to such test to allow time for the development of an approvable performance test plan and to arrange for an observer to be present at the test. Such prior approval shall minimize the possibility of EPA rejection of test results for procedural deficiencies.

3. For performance test purposes, sampling ports, platforms and access shall be provided by California Portland Cement Company on the kiln exhaust stack in accordance with 40 CFR 60.8(e)

B. Emission Limits For Carbon Monoxide (CO)

On and after the date this permit is issued, California Portland Cement Company shall not discharge or cause the discharge of CO into the atmosphere from the kiln stack in excess of the following amounts:

Preheater Kiln	3.0	lb/ton clinker (90-day rolling avg.)
	2,553.00	lb/hr (Max. 8 hr avg.)
	2,277.00	ton/yr

C. Emission Monitoring Requirements

1. Prior to operating at the revised limits provided in Special Condition B and thereafter, California Portland Cement Company shall install, maintain, and operate the following continuous monitoring systems:
 - a. A continuous monitoring system to measure stack gas CO concentrations to be located in the main stack. The system shall meet EPA monitoring performance specification (40 CFR 60.13 and 40 CFR 60, Appendix B, Performance Specification 4).
 - b. A continuous monitoring system to measure stack gas volumetric flow rates to be located at the exhaust stack. The system shall meet EPA performance specifications (40 CFR Part 60, Appendix B, Performance Specification 6). However, if, because of its location, the flow meter cannot meet the requirements of Appendix B, California Portland Cement Company shall have one year from the date of permit issuance to install a new flow meter at a new location that will meet the requirements of Appendix B.
2. California Portland Cement Company shall maintain a file of all measurements, including continuous monitoring systems evaluations; all continuous monitoring systems or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; performance and all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, report and records.
3. California Portland Cement Company shall, upon the request of the District or US EPA, submit a written report on the results of the annual performance test (i.e. RATA) on the main stack CO continuous emission monitor.
4. California Portland Cement Company shall submit a written report of all excess CO emissions to the District for every calendar quarter. The report shall include the following:
 - a. The magnitude of the excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factors used, and the date and time of commencement and compilation of each time period of excess emissions.
 - b. Specific identification of each period of excess emissions that occurs during startups, shutdowns, or malfunctions of the kiln. The nature and cause of any malfunction (if known) and the corrective action taken or preventative measures adopted shall also be reported.
 - c. The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks, and the nature of the system repairs or adjustments
 - d. When no excess emissions have occurred or the continuous monitoring system has not been

inoperative, repaired, or adjusted, such information shall be stated in the report

- e. Excess emissions shall be defined as any period during which the average emissions of CO, as measured by the CEM, exceeds the maximum emission limits set forth in Special Condition B. CO emissions during periods when the continuous emission monitor is inoperative shall be determined using the following procedure:
 - (1) Where N is the number of hours of missing emissions data, California Portland Cement Company shall determine the substitute hourly CO emissions in pounds per hour by averaging the measured values for the 1N hours immediately before the missing data period and the 1N hours immediately after the missing data period.
 - (2) Where 1N hours before or after the missing data period includes a missing data hour, the substituted value previously recorded for such hour(s) pursuant to this missing data procedure shall be used to determine the average in accordance with (1) above.
5. Excess emission indicated by the CEM system shall be considered violations of the applicable emission limit for the purpose of this permit.

D. NSPS Requirements

The preheater kiln is subject to the federal regulations entitled Standards of Performance for New Stationary Sources (40 CFR 60); California Portland Cement Company will meet all requirements of Subparts A and F of this regulation.

E. Certification

California Portland Cement Company shall notify the EPA in writing of compliance with Special Condition C above, and shall make such notification within fifteen (15) days of such compliance. This letter must be signed by a responsible representative of the California Portland Cement Company.

IX. Agency Notification

All correspondence as required by this Approval to Construct/Modify shall be forwarded to:

- A. Director, Air Division (Attn: AIR-3)
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105
- B. Manager, Permit Evaluation & Support Section, Enforcement Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

- C. Air Pollution Control Officer
Eastern Kern Air Pollution Control District
2700 M Street, Suite 302
Bakersfield, CA 93301