



Oregon

Kate Brown, Governor

Department of Environmental Quality
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May 18, 2020

Terry Kerby
Plant Manager
Ash Grove Cement Company – Durkee
33060 Shirttail Rd
PO BOX 287
Durkee, OR 97905

Dear Terry Kerby:

Thank you for your letter from February 6, 2020 regarding additional controls installed at the Durkee plant (01-0029) that were not reflected in your 2017 permit and the plant site emissions limit. DEQ used the 2017 PSEL to screen Oregon Title V facilities for applicability to conduct four factor analyses for the 2018-2028 round of the Regional Haze Program under Clean Air Act 40 CFR 51.308(f). DEQ requested the four factor analysis under OAR 340-214-0110.

As we discussed during our phone call on March 20, DEQ has reviewed your letter, the construction ACDP permit from 2017 (Permit No. 01-0029-CS-01), and the 2017 administrative amendment to the permit (Permit No. 01-0029-TV-01). In addition, DEQ took into account the historical actions that EPA took on Portland Cement companies as we reviewed your request.

The facility's particulate matter emissions are controlled by a recently installed baghouse system in accordance with the 2018 Portland Cement NESHAP revisions for particulate matter for the kilns and the clinker cooler. The particulate limit is 0.07 lbs/ton clinker for the kiln and the clinker cooler, both continuously monitored by Continuous Parametric Monitoring Systems. Limits are based on a 30-day rolling average. Annual stack tests have showed compliance with the PM limit and the facility has passed all audits to ensure the PM CPMS is functioning.

The permit also limits SO₂ emissions to 0.4 lb/ton clinker on a 3-hour average. Compliance is determined by stack testing for SO₂ at least once every 2 years.

NO_x emissions and emission factors have undergone recent substantive control reviews with EPA and are controlled by selective non-catalytic reaction with ammonia injection. The NO_x limit is 2.0 lb/ton clinker from the kiln monitored by CEMS. All limits are on a 30-day rolling average. The 2.0 lb/ton clinker permit limit is being used as the emission factor to establish the PSEL in the draft permit. The permit requires the NO_x CEMS be operated and maintained in accordance with 40 CFR 60, Appendices B and F and DEQ's Continuous Monitoring Manual.

These documents require quarterly audits which are performed by the permittee. The results of the audits are submitted to DEQ for review. No exceedances have been reported for NO_x limit since the SNCR was installed. Per Permit No. 01-0029-CS-01, emissions reductions in PM, NO_x, and SO₂ resulting from compliance with the standards in that permit modification shall not be considered as a creditable contemporaneous emission decrease for the purposes of obtaining a netting credit under DEQ's PSD program.

Given the reasons outlined above, the unique circumstances of the facility of having recently gone through a control technology review through the NESHAPs and the global enforcement process, and per the Regional Haze guidelines issued by EPA, DEQ concurs with your letter. DEQ may reopen any issued permit to include applicable requirements consistent with Oregon Regional Haze regulations. DEQ will document this action in Ash Grove's upcoming permit renewal. In alignment with 40 CFR 51.308, Oregon sources may be subject to reexamination of visibility impacts if new information warrants reassessment. This letter concludes the process for the Ash Grove Cement Company Durkee facility for the Second Planning Period of the Regional Haze Program. Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to be 'D Pei Wu', with a stylized, somewhat abstract shape.

D Pei Wu, PhD
Air Quality Planner, Oregon Department of Environmental Quality

CC:

Ali Mirzakhilili, Air Quality Division Administrator, DEQ
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