

Public Notice

DEQ Requests Comments on Ash Grove Cement Company's Proposed Air Quality Permit

The Oregon Department of Environmental Quality invites the public to submit written comments on the conditions of Ash Grove Cement Company's proposed air quality permit renewal, known officially as Simple Air Contaminant Discharge Permit.

Summary

DEQ proposes to renew the air quality permit for this facility. The permit renewal incorporates changes in Oregon rules and the installations of three baghouses since the prior permit renewal.

How do I participate?

To submit your comments for the public record, send them by mail, fax or email:

NWR AQ Permit Coordinator
700 NE Multnomah Street Ste 600
Portland, OR 97232

Fax: 503-229-6945

Email: nwraqpermits@deq.state.or.us

Written comments are due by 5 p.m.
Oct. 21, 2020.

About the facility

Ash Grove Cement is located at 3737 N. Port Center Way in Portland. The existing permit was issued on Aug. 2, 2011 and was originally scheduled to expire on June 6, 2016. The facility is a transfer station for bulk cement and has 15 baghouses that control particulate matter from the transfer, storage and load-out processes. Load-outs are to trucks and railroad cars.

What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the table at the end of this document.

How does DEQ determine permit requirements?

DEQ evaluates types and amounts of pollutants and the facility's location, and determines permit

requirements according to state and federal regulations.

How does DEQ monitor compliance with the permit requirements?

This permit would require the facility to monitor pollutants using federally-approved monitoring practices and standards.

The permittee is required to conduct regular baghouse inspections and maintenance and to submit annual reports to DEQ for review. Periodic inspections of the facility will be conducted by DEQ to ensure proper operations and compliance with all of the requirements.

What happens after the public comment period ends?

DEQ will review and respond to any comments received and may make changes to the permit in response. The permit will be renewed for a period of five years.

Where can I get more information?

Find out more and view the application at <https://go.usa.gov/xEJf2> or contact Northwest Region Air Quality Permit Coordinator at:

Phone: 503-229-5582 or 800-452-4011

Fax: 503-229-6945

Email: nwraqpermits@deq.state.or.us

View the application and related documents in person at the DEQ office in Portland. For a review appointment, call Northwest Region Air Quality Permit Coordinator at 503-229-5582.

Alternative Formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.



State of Oregon
Department of
Environmental
Quality

Northwest Region
Air Quality Program
700 NE Multnomah St, Ste
600
Portland, OR 97232

Phone: 503-229-5332

800-452-4011

Fax: 503-229-6945

Contact: Weston Li

www.oregon.gov/DEQ

DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.

Emissions limits

Criteria Pollutants: Table 1 below presents maximum allowable emissions of criteria pollutants for the facility. The current emission limit reflects maximum emissions the facility can emit under the existing permit. The proposed emission limit reflects maximum emissions the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

Table 1

Criteria Pollutant	Current Limit (tons/yr)	Proposed Limit (tons/yr)
Small particulate matter	14	14
Fine particulate matter	-	9

For more information about criteria pollutants, go to: www.epa.gov/criteria-air-pollutants

Hazardous air pollutants:

Ash Grove Cement does not have the potential to be a major source of hazardous air pollutants. EPA has determined that these types of businesses do not warrant such regulation.

For more information about hazardous air pollutants, go to: <https://www.epa.gov/haps>



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
SIMPLE
AIR CONTAMINANT DISCHARGE PERMIT

Northwest Region
700 NE Multnomah St., Suite 600
Portland, OR 97232

This permit is being issued in accordance with the provisions of ORS 468A.040 and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Ash Grove Cement Company
3737 N. Port Center Way
Portland, OR 97217

INFORMATION RELIED UPON:

Application No.: 028506
Date Received: 01/25/16

PLANT SITE LOCATION:

3737 N. Port Center Way
Portland, OR 97217

LAND USE COMPATIBILITY FINDING:

Approving Authority: City of Portland
Approval Date: 01/19/06

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Matt Hoffman, Northwest Region Air Quality Manager

Date

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-8010):

Table 1 Code	Source Description	SIC/NAICS
Part B, 85	Source not otherwise listed that would emit 10 tons or more per year of a pollutant if uncontrolled (cement distribution)	5032 / 423320

TABLE OF CONTENTS

1.0	DEVICE, PROCESS AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION	3
2.0	GENERAL EMISSION STANDARDS AND LIMITS	3
3.0	OPERATION AND MAINTENANCE REQUIREMENTS	5
4.0	PLANT SITE EMISSION LIMITS	6
5.0	COMPLIANCE DEMONSTRATION.....	6
6.0	RECORDKEEPING REQUIREMENTS.....	7
7.0	REPORTING REQUIREMENTS.....	9
8.0	ADMINISTRATIVE REQUIREMENTS	10
9.0	DEQ CONTACTS / ADDRESSES.....	11
10.0	GENERAL CONDITIONS AND DISCLAIMERS.....	12
11.0	EMISSION FACTORS (EF).....	14
12.0	PROCESS/PRODUCTION RECORDS	15
13.0	ABBREVIATIONS, ACRONYMS, AND DEFINITIONS.....	16

1.0 DEVICE, PROCESS AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION

The devices, processes, and pollution control devices regulated by this permit are the following:

Devices and Processes Description	Pollution Control Device Description	PCD ID
Ship Unloading	Baghouse	614.BF1
Conveyance to North Tanks	Baghouse	614.BF2
North Terminal Storage Tank 1	Baghouse	614.BF3
North Terminal Storage Tank 2	Baghouse	614.BF4
North Terminal Storage Tank 3	Baghouse	614.BF5
Unload Airlift Airslide Dust Collector	Baghouse	614.BF6
Railcar Loading	Baghouse	611.BF1
Reclaim Airlift Dust Collector	Baghouse	611.BF2
Pipe Conveyor Receiving	Baghouse	611.BF3
Tank Reclaim to Airlift Dust Collector	Baghouse	611.BF5
East Rail Loading Spout Dust Collector	Baghouse	611.BF6
Railcar Unloading	Baghouse	621.BF1
South Terminal Storage Silos	Baghouse	621.BF2
Truck Load-Out	Baghouse	621.BF3
Pipe Conveyor Discharge	Baghouse	621.BF4

2.0 GENERAL EMISSION STANDARDS AND LIMITS

2.1. Visible Emissions

The permittee must comply with the following visible emission limits from air contaminant sources other than fugitive emission sources, as applicable. Opacity must be measured as a six-minute block average using EPA Method 9.

- a. Emissions from any emission unit must not equal or exceed 20% opacity. [OAR 340-208-0110(3)(b) and (4)]
- b. Any devices or processes installed, constructed, or modified on or after April 16, 2015 must not equal or exceed 20% opacity. [OAR 340-208-0110(4) and (7)]

2.2. Fugitive Emissions

- a. The permittee must take reasonable precautions to prevent fugitive dust emissions from leaving the property of a source. Reasonable precautions include, but are not limited to: [OAR 340-208-0210]
 - i. Applying water or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
 - ii. Enclosing (full or partial) materials stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter, including dust, from becoming airborne;
 - iii. Installing and using hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
 - iv. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; and
 - v. Promptly removing earth or other material that does or may become airborne from paved streets.
- b. If requested by DEQ, the permittee must:
 - i. Prepare and submit a fugitive emission control plan within 60 days of the request;
 - ii. Implement the DEQ approved plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period; and
 - iii. Keep the plan on site and make the plan available upon request. [OAR 340-208-0210]
- c. In no case may fugitive dust emissions leave the property of a source for a period or periods totaling more than 18 seconds in a six-minute period. Fugitive emissions must be measured by EPA method 22 with the minimum observation time of six minutes.

2.3. Particulate Matter Emissions

The permittee must comply with the following particulate matter emission limits.

- a. Particulate matter emissions from baghouses 611.BF5, 611.BF6, and 614.BF6 must not exceed 0.10 grains per standard cubic foot. [OAR 340-226-0210(2) (c)]
- b. Particulate matter emissions from all baghouses except 611.BF5, 611.BF6, and 614.BF6 must not exceed 0.14 grains per dry standard cubic foot. [OAR 340-226-0210(2)(b)(B)]
- c. Non-fugitive particulate matter emissions from processes listed in OAR 340-226-0300 must not exceed the process weight emission standards shown in Table 1 of OAR 340-226-0310.
- d. Particulate matter emissions from any device or process (other than fugitive emissions sources, fuel burning equipment, refuse burning equipment, or solid fuel burning devices certified under OAR 340-262-0500) that is installed, constructed or modified after April 16, 2015 must not exceed 0.10 grains per dry standard cubic foot. [OAR 340-226-0210(2)(c)]

2.4. Particulate Matter Fallout

The permittee must not cause or permit the deposition of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [OAR 340-208-0450]

2.5. Nuisance and Odors

The permittee must not cause or allow the emission of odorous or other fugitive emissions so as to create nuisance conditions off the permittee's property. Nuisance conditions will be verified by DEQ personnel. [OAR 340-208-0300]

2.6. Complaint Log

The permittee must maintain a log of all complaints received by the permittee in person, in writing, by telephone or through other means that specifically refer to air pollution, odor, or nuisance concerns associated with the permitted facility. Documentation must include: [OAR 340-214-0114]

- a. The date the complaint was received;
- b. The date and time the complaint states the condition was present;
- c. A description of the pollution or odor condition;
- d. The location of the complainant/receptor relative to the plant site;
- e. The status of plant operation or activities during the complaint's stated time of pollution or odor condition; and
- f. A record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

3.0 OPERATION AND MAINTENANCE REQUIREMENTS

3.1. Operation of Pollution Control Devices and Processes

The permittee must operate and ensure proper functioning of all air pollution control devices and components at all times when the associated emission source is operating. [OAR 340-226-0120]

3.2. Baghouse Inspection and Maintenance

The permittee must visually inspect each baghouse at least annually. The date, name of inspector, and corrective actions taken, if any, must be recorded and filed. If the inspection is conducted by a service provider, a legible statement of services will be acceptable. All occurrences of major maintenance (i.e., replacing more than 1/3 of the bags) must be recorded and filed.

3.3. Highest and Best Practicable Treatment and Control

The permittee must provide the highest and best practicable treatment and control of air contaminant emissions in every case so as to maintain overall air quality at the highest possible levels, and to maintain contaminant concentrations, visibility reduction, odors, soiling, and other deleterious factors at the lowest possible levels as provided below. [OAR 340-226-0100]

- a. The permittee must take corrective action within one hour of observing the pressure drop across any of the baghouses outside of normal range of 2 - 10 inches of water column. The permittee must observe and log readings at minimum of weekly while process is operating. The permittee must shut down the process being controlled if the range cannot be re-attained within 3 hours. The action level is not applicable during bag shaking or reverse air cleaning.
- b. The exceedance of an action level shall not be considered a violation of an emission limit in this permit. [OAR 340-226-0120(2)(d)]

4.0 PLANT SITE EMISSION LIMITS

4.1. Plant Site Emission Limits (PSEL)

The permittee must not cause or allow plant site emissions to exceed the following: [OAR 340-222-0040 and/or OAR 340-222-0041, OAR 340-222-0060]

Pollutant	Limit	Units
PM ₁₀	14	tons per year
PM _{2.5}	9	

4.2. Annual Period

The annual plant site emissions limits apply to any 12-consecutive calendar month period. [OAR 340-222-0035]

5.0 COMPLIANCE DEMONSTRATION

5.1. Monitoring Requirements

The permittee must monitor the operation and maintenance of the facility and associated air contaminant control devices as follows: [OAR 340-226-0120]

- a. Record on a monthly basis the material throughputs, in tons, for the processes listed in the table in Condition 1.0.
- b. Monitor pressure drops across all of the baghouses per Condition 3.3.

5.2. PSEL Compliance Monitoring using Emission Factors

The permittee must calculate the emissions for each 12-consecutive calendar month period based on the following calculation for each pollutant except GHGs: [OAR 340-222-0080]

$$E = \Sigma(EF \times P) \times 1 \text{ ton}/2000 \text{ pounds}$$

where:

- E = pollutant emissions (tons/year);
- Σ = symbol representing “summation of”;
- EF = pollutant emission factor (see Condition 11.0);
- P = process production (see Condition 12.0)

5.3. Emission Factors

The permittee must use the default emission factors provided in Condition 11.0 for calculating pollutant emissions, unless alternative emission factors are approved in writing by DEQ. The permittee may request or DEQ may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by DEQ. [OAR 340-222-0080]

5.4. PSEL Compliance Monitoring

The permittee must demonstrate compliance with the PSEL by totaling the emissions from all point sources calculated under Condition 5.2. [OAR 340-222-0080]

6.0 RECORDKEEPING REQUIREMENTS

6.1. Operation and Maintenance

The permittee must maintain the following records related to the operation and maintenance of the facility and associated air contaminant control devices: [OAR 340-214-0114]

- a. Monthly material throughputs per Condition 5.1.a.
- b. Annual inspections and major maintenance on the baghouses, upon occurrence, per Condition 3.2.
- c. Baghouse normal pressure drop range exceedances, including date, time, duration, cause and corrective actions, upon occurrence, per Conditions 3.3 and 5.1.b.
- d. Monthly calculation of 12-month emission rate per Conditions 5.2 and 5.4.

6.2. Excess Emissions

- a. The permittee must maintain the records of excess emissions listed below and as defined in OAR 340-214-0300 through 340-214-0340, recorded on occurrence.

Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity as a six-minute block average.

- i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
 - ii. The date and time the permittee notified DEQ of the event;
 - iii. The equipment involved;
 - iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
 - v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
 - vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations); and
 - vii. The final resolution of the cause of the excess emissions;
- b. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must immediately take action to minimize emissions by reducing or ceasing operation of the equipment or facility, unless doing so could result in physical damage to the equipment or facility, or cause injury to employees. In no case may the permittee operate more than 48 hours after the beginning of the excess emissions, unless continued operation is approved by DEQ in accordance with OAR 340-214-0330(4).
 - c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify DEQ by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
 - d. The permittee must maintain a log of all excess emissions in accordance with OAR 340-214-0340(3).

6.3. Complaints

The permittee must maintain a log of all complaints received by the permittee in person, in writing, by telephone or through other means according to Condition 2.6. Documentation must include all information identified in Condition 2.6. [OAR 340-214-0114]

6.4. Retention of Records

Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application and make them available to DEQ upon request. The permittee must maintain the two (2) most recent years of records onsite. [OAR 340-214-0114]

7.0 REPORTING REQUIREMENTS

7.1. Excess Emissions

- a. The permittee must notify DEQ of excess emissions events if the excess emission is of a nature that could endanger public health.
- b. The permittee must also submit follow-up reports summarizing records of excess emissions as required in Condition 6.2 when required by DEQ. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 9.0 by email, telephone, facsimile, or in person.

7.2. Annual Report

For each year this permit is in effect, the permittee must submit to DEQ by **February 15** two (2) paper copies and one (1) electronic copy of the following information for the previous calendar year. If February 15 falls on a weekend or Monday holiday, the permittee must submit their annual report on the next business day.

- a. Material throughputs, in tons, per Condition 6.1.a.
- b. Date of the last annual baghouse inspection(s) and details of any major maintenance performed per Condition 6.1.b.
- c. A brief summary listing the date, time, duration, cause and corrective actions, and the affected baghouse for normal pressure drop range exceedances per Condition 6.1.c.
- d. Calculations of annual pollutant emissions determined each month in accordance with Condition 6.1.d.
- e. Summary of complaints relating to air quality received by permittee during the year in accordance with Condition 6.3.
- f. List permanent changes made in facility process, production levels, and pollution control equipment which affected air contaminant emissions.

7.3. Notice of Change of Ownership or Company Name

The permittee must notify DEQ in writing using a DEQ “Transfer Application Form” within 60 days after the following:

- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
- b. Sale or exchange of the activity or facility.

7.4. Construction or Modification Notices

The permittee must notify DEQ in writing using a DEQ “Notice of Intent to Construct Form,” or other permit application form and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:

- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
- b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. Constructing or modifying any air pollution control equipment.

8.0 ADMINISTRATIVE REQUIREMENTS

8.1. Permit Renewal Application

The permittee must submit the completed application package for renewal of this permit **120 days prior to the expiration date**. Two (2) paper copies and one (1) electronic copy of the application must be submitted to the DEQ Permit Coordinator listed in Condition 9.2. [OAR 340-216-0040]

8.2. Permit Modifications

Application for a modification of this permit must be submitted at least 60 days prior to the source modification. When preparing an application, the applicant should also consider submitting the application 180 days prior to allow DEQ adequate time to process the application and issue a permit before it is needed. A special activity fee must be submitted with an application for the permit modification. The fees and two (2) copies of the application must be submitted to the DEQ Business Office.

8.3. Annual Compliance Fee

The permittee must pay the annual fees specified in OAR 340-216-8020, Table 2, Parts 2 and 3 for a Simple ACDP by **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by DEQ regulations will be mailed prior to the above date. **Late fees in accordance with Part 5 of the table will be assessed as appropriate.**

8.4. Change of Ownership or Company Name Fee

The permittee must pay the non-technical permit modification fee specified in OAR 340-216-8020, Table 2, Part 4 with an application for changing the ownership or the name of the company.

8.5. Special Activity Fees

The permittee must pay the special activity fees specified in OAR 340-216-8020, Table 2, Part 4 with an application to modify the permit.

9.0 DEQ CONTACTS / ADDRESSES

9.1. Business Office

The permittee must submit payments for invoices, applications to modify the permit, and any other payments to DEQ's Business Office:

Oregon Dept. of Environmental Quality
Financial Services – Revenue Section
700 NE Multnomah St., Suite 600
Portland, Oregon 97232-4100

9.2. Permit Coordinator

The permittee must submit all notices and applications that do not include payment to the Permit Coordinator.

Oregon Dept. of Environmental Quality
Northwest Region Air Quality
Permit Coordinator
700 NE Multnomah St., Suite 600
Portland, OR 97232-4100
nwraqpermits@deq.state.or.us

9.3. Report Submittals

Unless otherwise notified, the permittee must submit all reports (annual reports, source test plans and reports, etc.) to DEQ's Region. If you know the name of the Air Quality staff member responsible for your permit, please include it:

Oregon Dept. of Environmental Quality
Northwest Region Air Quality
700 NE Multnomah St., Suite 600
Portland, OR 97232-4100

9.4. Web Site

Information about air quality permits and DEQ's regulations may be obtained from the DEQ web page at www.oregon.gov/deq/.

10.0 GENERAL CONDITIONS AND DISCLAIMERS

10.1. Permitted Activities

- a. Until this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from the following:
 - i. Processes and activities directly related to or associated with the devices/processes listed in Condition 1.0 of this permit;
 - i. Any categorically insignificant activities, as defined in OAR 340-200-0020, at the source; and
 - ii. Construction or modification changes that are Type 1 or Type 2 changes under OAR 340-210-0225 that are approved by DEQ in accordance with OAR 340-210-0215 through 0250, if the permittee complies with all of the conditions of DEQ's approval to construct and all of the conditions of this permit.
- b. Discharge of air contaminants from any other equipment or activity not identified herein is not authorized by this permit.

10.2. Other Regulations

In addition to the specific requirements listed in this permit, the permittee must comply with all other applicable legal requirements enforceable by DEQ.

10.3. Conflicting Conditions

In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply. [OAR 340-200-0010]

10.4. Masking of Emissions

The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [OAR 340-208-0400]

10.5. DEQ Access

The permittee must allow DEQ's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468.095.

10.6. Permit Availability

The permittee must have a copy of the permit available at the facility at all times. [OAR 340-216-0020(3)]

10.7. Open Burning

The permittee may not conduct any open burning except as allowed by OAR 340, division 264.

10.8. Asbestos

The permittee must comply with the asbestos abatement requirements in OAR 340, division 248 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance.

10.9. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

10.10. Permit Expiration

- a. A source may not be operated after the expiration date of the permit, unless any of the following occur prior to the expiration date of the permit: [OAR 340-216-0082]
 - i. A timely and complete application for renewal of this permit or for a different ACDP has been submitted; or
 - ii. A timely and complete application for renewal or for an Oregon Title V Operating Permit has been submitted, or
 - iii. Another type of permit (ACDP or Oregon Title V Operating Permit) has been issued authorizing operation of the source.
- b. For a source operating under an ACDP or Oregon Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially.

10.11. Permit Termination, Revocation, or Modification

DEQ may terminate, revoke, or modify this permit pursuant to OAR chapter 340 division 216. [OAR 340-216-0082].

11.0 EMISSION FACTORS (EF)

Emissions device or activity	Control Unit	PM₁₀ EF	PM_{2.5} EF	EF units	EF Reference
Ship Unloading	614.BF1	0.00497	0.00141	Lb/ton	Eng. Est.
Conveyance To Storage Tanks	614.BF2	0.00243	0.00069	Lb/ton	Eng. Est.
North Terminal Storage Tanks	614.BF3-5	0.00032	0.00009	Lb/ton	Eng. Est.
Unload Airlift Airslide Dust Collector	614.BF6	0.00008	0.00002	Lb/ton	Eng. Est.
Railcar Loading	611.BF1	0.00163	0.00046	Lb/ton	Eng. Est.
Reclaim Airlift Dust Collector	611.BF2	0.00262	0.00074	Lb/ton	Eng. Est.
Pipe Conveyor Receiving	611.BF3	0.00135	0.00038	Lb/ton	Eng. Est.
Tank Reclaim To Airlift Dust Collector	611.BF5	0.00058	0.00016	Lb/ton	Eng. Est.
East Rail Loading Spout Dust Collector	611.BF6	0.00054	0.00015	Lb/ton	Eng. Est.
Railcar Unloading	621.BF1	0.00043	0.00012	Lb/ton	Eng. Est.
South Terminal Storage Silos	621.BF2	0.00081	0.00023	Lb/ton	Eng. Est.
Truck Load-Out	621.BF3	0.00129	0.00036	Lb/ton	Eng. Est.
Pipe Conveyor Discharge	621.BF4	0.00086	0.00024	Lb/ton	Eng. Est.

12.0 PROCESS/PRODUCTION RECORDS

Emissions device or activity	Process or production parameter	Frequency
Ship Unloading	Tons of material unloaded	Monthly
North Terminal Storage Tanks (1-3)	Tons of material transferred	Monthly
South Terminal Storage Silos	Tons of material transferred	Monthly
Rail Load-Out	Tons of material shipped	Monthly
Truck Load-Out	Tons of material shipped	Monthly

13.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	O ₂	oxygen
ASTM	American Society for Testing and Materials	OAR	Oregon Administrative Rules
AQMA	Air Quality Maintenance Area	ORS	Oregon Revised Statutes
calendar year	The 12-month period beginning January 1st and ending December 31 st	O&M	operation and maintenance
CAO	Cleaner Air Oregon	Pb	lead
CFR	Code of Federal Regulations	PCD	pollution control device
CO	carbon monoxide	PEMS	Predictive emission monitoring system
CO _{2e}	carbon dioxide equivalent	PM	particulate matter
DEQ	Oregon Department of Environmental Quality	PM ₁₀	particulate matter less than 10 microns in size
dscf	dry standard cubic foot	PM _{2.5}	particulate matter less than 2.5 microns in size
EPA	US Environmental Protection Agency	ppm	part per million
FCAA	Federal Clean Air Act	PSD	Prevention of Significant Deterioration
Gal	gallon(s)	PSEL	Plant Site Emission Limit
GHG	greenhouse gas	PTE	Potential to Emit
gr/dscf	grains per dry standard cubic foot	RACT	Reasonably Available Control Technology
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	scf	standard cubic foot
I&M	inspection and maintenance	SER	Significant Emission Rate
lb	pound(s)	SIC	Standard Industrial Code
MMBtu	million British thermal units	SIP	State Implementation Plan
NA	not applicable	SO ₂	sulfur dioxide
NESHAP	National Emissions Standards for Hazardous Air Pollutants	Special Control Area	as defined in OAR 340-204-0070
NO _x	nitrogen oxides	TACT	Typically Achievable Control Technology
NSPS	New Source Performance Standard	VE	visible emissions
NSR	New Source Review	VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months



DEQ

State of Oregon
Department of
Environmental
Quality

SIMPLE AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

Ash Grove Cement Company
3737 N. Port Center Way
Portland, OR 97217

Source Information:

SIC	5032
NAICS	423320
EPA ICIS-Air ID	

Source Categories (Table 1 Part, code)	B, 85
Public Notice Category	II

Compliance and Emissions Monitoring Requirements:

FCE	
Compliance schedule	
Unassigned emissions	
Emission credits	
Special Conditions	

Source test	
COMS	
CEMS	
PEMS	
Ambient monitoring	

Reporting Requirements

Annual report (due date)	15 Feb
Quarterly report (due dates)	

Monthly report (due dates)	
Excess emissions report	
Other (specify)	

Air Programs

Synthetic Minor (SM)	
SM -80	
NSPS (list subparts)	
NESHAP (list subparts)	
CAO	
NSR	

PSD	
GHG	
RACT	
TACT	
Other (specify)	

TABLE OF CONTENTS

PERMITTING3
SOURCE DESCRIPTION4
COMPLIANCE HISTORY5
EMISSIONS5
TITLE V MAJOR SOURCE APPLICABILITY6
CLEANER AIR OREGON.....7
ADDITIONAL REQUIREMENTS8
SOURCE TESTING8
PUBLIC NOTICE.....9
ATTACHMENT A – DETAIL SHEETS10

PERMITTING

PERMITTEE IDENTIFICATION

1. Ash Grove Cement Company is located at 3737 N. Port Center Way, Portland, OR 97217.

PERMITTING ACTION

2. The proposed permit is a renewal of an existing Simple Air Contaminant Discharge Permit (ACDP) that was issued on 08/02/2011 and was originally scheduled to expire on 06/01/2016. The permittee is on a Simple permit because the facility would emit 10 tons or more per year of PM₁₀ if uncontrolled for its cement distribution operation. The existing ACDP remains in effect until final action is taken on the renewal application because the permittee submitted a timely and complete application for renewal.
3. Ash Grove Cement Company has been determined to be an existing source for the purposes of Cleaner Air Oregon in accordance with OAR 340-245-0020 because the air quality permit application was submitted and deemed complete, or construction had commenced on this facility prior to November 16, 2018. As an existing source the permittee is required to perform a risk assessment in accordance with OAR 340-245-0050, and demonstrate compliance with the Risk Action Levels for an "Existing Source" in OAR 340-245-8010 Table 1 when called in by DEQ. Ash Grove Cement Company has not been called in and therefore, has not performed a risk assessment.

OTHER PERMITS

4. Other permits issued or required by the DEQ for this source include: a general Water Pollution Control Facility permit (#18235) for discharge of vehicle and equipment wash water.

ATTAINMENT STATUS

5. The source is located in a maintenance area for CO and Ozone. NO_x and VOC are precursors to Ozone. The facility is an insignificant source of CO, NO_x and VOC. The area is in attainment for all other criteria pollutants, including PM/PM₁₀/PM_{2.5}. The subject facility is a source of PM/PM₁₀/PM_{2.5} only.
6. The source is not located within 10 kilometers of a Class I Air Quality Protection Area and the emissions are less than the significant emissions rate.

SOURCE DESCRIPTION

OVERVIEW

7. The permittee operates a cement transfer facility. Material is unloaded from ships and railcars, transferred to storage silos, then loaded out to trucks and railcars. The former Goldendale side was built in 1982 and includes ship unloading, conveyance to silos; and a railcar load-out point. The Ash Grove side was built in 1995 and includes a railcar unload facility, storage elevator, and truck load-out point. The two sides are connected by a fully enclosed pipe conveyor.
8. The following changes have been made to the facility since the last permit renewal. Those changes did not increase facility's capacity but reduced the total emissions from the facility because of reduced fugitive emissions.
 - a. Tank Reclaim to Airlift Dust Collector (611.BF5) was installed in 2016;
 - b. East Rail Loading Spout Dust Collector (611.BF6) was installed in 2017; and
 - c. Unload Airlift Airslide Dust Collector (614.BF6) was installed in 2019.

PROCESS AND CONTROL DEVICES

9. Existing air contaminant sources at the facility consist of the following:

Device/Process Description	Pollution Control Device Description	Construction / Installation Date	Control Efficiency
Ship Unloading	Baghouse	1982	99.9%
Conveyance to North Tanks	Baghouse	1982	99.9%
North Terminal Storage Tank 1	Baghouse	1982	99.9%
North Terminal Storage Tank 2	Baghouse	1982	99.9%
North Terminal Storage Tank 3	Baghouse	1982	99.9%
Unload Airlift Airslide Dust Collector	Baghouse	2019	99.9%
Railcar Loading	Baghouse	1982	99.9%
Reclaim Airlift Dust Collector	Baghouse	1982	99.9%
Pipe Conveyor Receiving	Baghouse	1982	99.9%
Tank Reclaim to Airlift Dust Collector	Baghouse	2016	99.9%
East Rail Loading Spout Dust Collector	Baghouse	2017	99.9%
Railcar Unloading	Baghouse	1995	99.9%
South Terminal Storage Silos	Baghouse	1995	99.9%
Truck Load-Out	Baghouse	1995	99.9%
Pipe Conveyor Discharge	Baghouse	1995	99.9%

COMPLIANCE HISTORY

10. The facility was inspected on 5/29/15 and 3/1/19 and found to be in compliance with all permit conditions.
11. During the prior permit period there was one complaint recorded for this facility on 9/14/16 regarding dust at the facility. The dust was generated from a sweeper truck being used to clean the facility yard and roadways and was of short duration. Water is not used to control dust at the cement plant and most cleaning is done with vacuums or dry sweepers.
12. No enforcement actions have been taken against this source since the last permit renewal.

EMISSIONS

13. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
PM ₁₀	NA	NA	NA	14	14	0
PM _{2.5}	NA	NA	NA	-	9	9

- a. The netting basis is zero for Simple ACDPs in accordance with OAR 340-222-0046(2).
- b. The previous PM₁₀ PSEL is the PM₁₀ PSEL in the last permit.
- c. PM_{2.5} became a regulated pollutant on May 1, 2011 and a PM_{2.5} PSEL is added in this permit renewal.
- d. For Simple ACDPs, the proposed PSELs for all pollutants are equal to the Generic PSEL in accordance with OAR 340-216-0064(3)(b).
- e. All activities are controlled by baghouses. Therefore, all PM emissions are considered to be PM₁₀.
- f. The PM₁₀ emission factors in the previous permit reflected the conceptual design. Emission factors in the proposed permit are based on actual equipment design capacities and flows, using efficiencies of the baghouses equivalent to 0.01 gr/dscf.
- g. The potential to emit for PM_{2.5} is estimated to be 1.27 tons/year. Because this is at or above the de minimis level of 1 ton/year but below the generic PSEL level,

PSEL for PM_{2.5} is set at the generic PSEL level of 9 tons/year. The limit does not represent a PM_{2.5} emission increase.

- h. The PM_{2.5} emission factors reflected a fraction of 28.3% of PM₁₀ emissions using the emission factors of 0.000046 lb/ton for PM₁₀ and 0.000013 lb/ton for PM_{2.5} (AP-42, Ch 11-19, Table 11.19.2-2 for SCC 3-05-020-06.)
- i. The PSEL is a federally enforceable limit on the potential to emit.

SIGNIFICANT EMISSION RATE ANALYSIS

- 14. For each pollutant, the proposed Plant Site Emission Limit is less than the sum of the Netting Basis and the significant emission rate, thus no further air quality analysis is required at this time.

TITLE V MAJOR SOURCE APPLICABILITY

- 15. A major source is a facility that has the potential to emit 100 tons/year or more of any criteria pollutant or 10 tons/year or more of any single HAP or 25 tons/year or more of combined HAPs.
- 16. A source that has potential to emit at the major source levels but accepts a PSEL below major source levels is called a synthetic minor (SM).
- 17. A source that has the potential to emit above the Title V major source thresholds but is willing to take a limit that is 80% or greater of the major source thresholds (e.g., 80 tons per year or greater for criteria pollutants) is called a synthetic minor 80 (SM-80).
- 18. A source that has the potential to emit less than major source thresholds is called a true minor.
- 19. A source that has the potential to emit less than major source thresholds but is required by rule to obtain a Title V permit is called a Title V minor source.

CRITERIA POLLUTANTS

- 20. This facility is a true minor source of criteria pollutant emissions. The basis for this determination can be found in ATTACHMENT A – DETAIL SHEETS of this Review Report.

HAZARDOUS AIR POLLUTANTS

21. This source is not a major source of hazardous air pollutants. The basis for this determination can be found in ATTACHMENT A – DETAIL SHEETS of this Review Report.

Hazardous Air Pollutants	Potential to Emit (pounds/year)	2016 Actual Emissions (pounds/year)
Chromium VI	0.03	0.01
Cobalt Compounds	0.20	0.07
Manganese Compounds	11.04	3.96
Total HAP emissions	11.27	4.04

CLEANER AIR OREGON

22. The Cleaner Air Oregon Toxic Air Contaminant emissions inventory for this source can be found on this website:
<https://www.deq.state.or.us/aq/aqpermitsonline/SearchFilter.asp>.
23. Ash Grove Cement Company has not been called in and therefore, has not performed a risk assessment.

TOXICS RELEASE INVENTORY

24. The Toxics Release Inventory (TRI) is federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, over which DEQ has no regulatory authority. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, [chemicals covered by the TRI Program](#) are those that cause:
- Cancer or other chronic human health effects;
 - Significant adverse acute human health effects; or
 - Significant adverse environmental effects.
25. There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical. Ash Grove Cement Company is not covered by the TRI program because it is not one of the specific industry sectors required to report under the TRI program.

ADDITIONAL REQUIREMENTS

NEW SOURCE PERFORMANCE STANDARDS APPLICABILITY

26. There are no devices/processes at this facility for which a New Source Performance Standard has been promulgated.

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS APPLICABILITY

27. There are no sources at this facility for which a National Emission Standard for Hazardous Air Pollutant standard has been promulgated.

GREENHOUSE GAS REPORTING APPLICABILITY

28. The source does not have fuel combustion equipment and emergency generators and is not subject to greenhouse gas reporting under division 215 because actual greenhouse gas emissions are less than 2,500 metric tons (2,756 short tons) of CO₂ equivalents per year. If the source ever emits more than this amount, they will be required to report greenhouse gas emissions.

REASONABLY AVAILABLE CONTROL TECHNOLOGY APPLICABILITY

29. The facility is located in the Portland AQMA but it is not one of the listed source categories in OAR 340-232-0010, thus the RACT rules do not apply.

TYPICALLY ACHIEVABLE CONTROL TECHNOLOGY APPLICABILITY

30. The source is likely meeting OAR 340-226-0130 Highest and Best Practicable Treatment and Control and Typically Achievable Control Technology (TACT) by operating baghouses to control PM emissions. The permittee must take corrective action within one hour of observing the pressure drop across any of the baghouses outside of normal range of 2 - 10 inches of water column. The permittee must observe and log readings at minimum of weekly while process is operating. The permittee must shut down the process being controlled if the range cannot be re-attained within 3 hours.

SOURCE TESTING

PRIOR TESTING RESULTS

31. There are no source testing requirements in the current and previous permits for this facility and there are no previous testing results.

PUBLIC NOTICE

32. Pursuant to OAR 340-216-0064(4)(a), issuance of Simple Air Contaminant Discharge Permits requires public notice in accordance with OAR 340-209-0030(3)(b), which requires DEQ to provide notice of the proposed permit action and a minimum of 30 days for interested persons to submit written comments. **The public notice was emailed/mailed on September 21, 2020 and the comment period will end on October 21, 2020 at 5 p.m.**

WL:ltb

ATTACHMENT A – DETAIL SHEETS

Ash Grove Cement Company Portland Terminal		Tons/Yr
Estimate of Potential to Emit PM/PM10/PM2.5 (Note: PM = PM10)		
1	Imported Cement to Outbound Rail (North)	50,000
2	Imported Cement to Outbound Truck (South)	450,000
3	Inbound Rail (North) to Outbound Rail (North)	-
4	Inbound Rail (North) to Outbound Truck (South)	-
5	Inbound Rail (South) to Outbound Truck (South)	550,000
Total		1,050,000

Point Source Emissions										
Equip. No	Device/Process Description	Flow (scfm)	Annual Throughput (tons)	Equip. Rated Capacity (stph)	Operating Hours	Grain loading EF (gr/scf)	PM10 EF (lb/ton)	PM10 (tpy)	PM2.5 EF (lb/ton)	PM2.5 (tpy)
614.BF1	Ship Unloading	38,881	500,000	670	746	0.01	0.00497	1.24	0.00141	0.35
614.BF2	Conveyance to North Tanks	19,000	500,000	670	746	0.01	0.00243	0.61	0.00069	0.17
614.BF3	North Terminal Storage Tank 1	2,500	166,667	670	249	0.01	0.00032	0.03	0.00009	0.01
614.BF4	North Terminal Storage Tank 2	2,500	166,667	670	249	0.01	0.00032	0.03	0.00009	0.01
614.BF5	North Terminal Storage Tank 3	2,500	166,667	670	249	0.01	0.00032	0.03	0.00009	0.01
614.BF6	Unload Airlift Airslide Dust Collector	600	500,000	670	746	0.01	0.00008	0.02	0.00002	0.01
611.BF1	Railcar Loading	7,600	50,000	400	125	0.01	0.00163	0.04	0.00046	0.01
611.BF2	Reclaim Airlift Dust Collector	12,215	50,000	400	125	0.01	0.00262	0.07	0.00074	0.02
611.BF3	Pipe Conveyor Receiving	6,300	450,000	400	1125	0.01	0.00135	0.30	0.00038	0.09
611.BF5	Tank Reclaim to Airlift Dust Collector	2,700	50,000	400	125	0.01	0.00058	0.01	0.00016	0.00
611.BF6	East Rail Loading Spout Dust Collector	2,500	50,000	400	125	0.01	0.00054	0.01	0.00015	0.00
621.BF1	Railcar Unloading	2,000	550,000	400	1375	0.01	0.00043	0.12	0.00012	0.03
621.BF2	South Terminal Storage Silos	3,800	1,000,000	400	2500	0.01	0.00081	0.41	0.00023	0.12
621.BF3	Truck Load-Out	6,000	1,000,000	400	2500	0.01	0.00129	0.64	0.00036	0.18
621.BF4	Pipe Conveyor Discharge	4,000	450,000	400	1125	0.01	0.00086	0.19	0.00024	0.05
Total								3.75	1.06	

Fugitive Emissions					
Emission Point	Description	Annual Throughput (tons)	EF (lb/ton)	EF Reference	PM (tpy)
FU-1	Fugitive emissions from the hold of the ship	500,000	0.0030	AP-42, Ch 11-19, SCC 3-05-020-06	0.75
Total PM10 (point source (PM10) + fugitive (PM))					4.50
Total PM2.5 (point source (PM2.5) + fugitive (PM)*28.3%)					1.27

Estimate of Potential to Emit HAPs			
1.	2016 Actual Throughput	376,477	tons/yr
2.	Potential Throughput	1,050,000	tons/yr
HAPs	2016 CAO Actual Emissions (pounds/year)	Potential to Emit (pounds/year)	
Chromium VI	0.01	0.03	
Cobalt Compounds	0.07	0.20	
Manganese Compounds	3.96	11.04	
Total HAP emissions	4.04	11.27	