Portland Cement Manufacturing Industry NESHAP Summary of Requirements[1]

Requirements for New or Existing Open Clinker Storage Pile at Major or Area Source of HAP

Applicability/Affected Sources: 63.1340(b)(9)

§63.1340 What parts of my plant does this subpart cover?

(b) The affected sources subject to this subpart are:

(9) Each open clinker storage pile at any portland cement plant.

Emission and Work Practice Standards – General: 63.1343(a)

§63.1343 What standards apply to my kilns, clinker coolers, raw material dryers, and open clinker storage piles?

(a) General. The provisions in this section apply to each kiln and any alkali bypass associated with that kiln, clinker cooler, raw material dryer, and open clinker storage pile. All D/F, HCl, and total hydrocarbon (THC) emissions limit are on a dry basis. The D/F, HCl, and THC limits for kilns are corrected to 7 percent oxygen. All THC emissions limits are measured as propane. Standards for mercury and THC are based on a rolling 30-day average. If using a CEMS to determine compliance with the HCl standard, this standard is based on a rolling 30-day average. You must ensure appropriate corrections for moisture are made when measuring flow rates used to calculate mercury emissions. The 30-day period means all operating hours within 30 consecutive kiln operating days excluding periods of startup and shutdown. All emissions limits for kilns, clinker coolers, and raw material dryers currently in effect that are superseded by the limits below continue to apply until the compliance date of the limits below, or until the source certifies compliance with the limits below, whichever is earlier.

Emission and Work Practice Standards – Open Clinker Storage Piles: 63.1343(c)

§63.1343 What standards apply to my kilns, clinker coolers, raw material dryers, and open clinker storage piles?

(c) *Open clinker storage pile*. The owner or operator of an open clinker storage pile must prepare, and operate in accordance with, the fugitive dust emissions control measures, described in their operation and maintenance plan (see §63.1347 of this subpart), that is appropriate for the site conditions as specified in paragraphs (c)(1) through (3) of this section. The operation and maintenance plan must also describe the measures that will be used to minimize fugitive dust emissions from piles of clinker, such as accidental spillage, that are not part of open clinker storage piles.

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[1] Disclaimer: The content provided in this software tool is intended solely as an aid in assessing requirements for compliance under the National Emissions Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry, 40 CFR part 63 subpart LLL. Any variation between the rule and the information provided in this tool is unintentional, and, in the case of such variations, the requirements of the rule govern. Use of this tool does not constitute an assessment by the EPA of the applicability of the rule to any particular facility. In any particular case, the EPA will make its assessment by applying the law and regulations to the specific facts of the case.

(1) The operation and maintenance plan must identify and describe the location of each current or future open clinker storage pile and the fugitive dust emissions control measures the owner or operator will use to minimize fugitive dust emissions from each open clinker storage pile.

(2) For open clinker storage piles, the operations and maintenance plan must specify that one or more of the following control measures will be used to minimize to the greatest extent practicable fugitive dust from open clinker storage piles: Locating the source inside a partial enclosure, installing and 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. You must select, for inclusion in the operations and maintenance plan, the fugitive dust control measure or measures listed in this paragraph that are most appropriate for site conditions. The plan must also explain how the measure or measures selected are applicable and appropriate for site conditions. In addition, the plan must be revised as needed to reflect any changing conditions at the source.

(3) Temporary piles of clinker that result from accidental spillage or clinker storage cleaning operations must be cleaned up within 3 days.

Operation and Maintenance Plan: 63.1347

§63.1347 Operation and maintenance plan requirements.

(a) You must prepare, for each affected source subject to the provisions of this subpart, a written operations and maintenance plan. The plan must be submitted to the Administrator for review and approval as part of the application for a part 70 permit and must include the following information:

(1) Procedures for proper operation and maintenance of the affected source and air pollution control devices in order to meet the emissions limits and operating limits, including fugitive dust control measures for open clinker piles of §§63.1343, 63.1345, and 63.1346. Your operations and maintenance plan must address periods of startup and shutdown.

(2) Corrective actions to be taken when required by paragraph §63.1350(f)(3);

(3) Procedures to be used during an inspection of the components of the combustion system of each kiln and each in-line kiln raw mill located at the facility at least once per year.

(b) Failure to comply with any provision of the operations and maintenance plan developed in accordance with this section is a violation of the standard.

Compliance Requirements – General Duty to Minimize Emissions: 63.1348(d)

§63.1348 Compliance requirements.

(d) *General duty to minimize emissions.* At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

<u>Compliance Date for Existing Sources with Open Clinker Storage Pile Requirements:</u> 63.1351(e)

§63.1351 Compliance dates.

(e) The compliance date for existing sources with the requirements for open clinker storage piles in §63.1343(c) is February 12, 2014.