

TECHNICAL REVIEW AND EVALUATION
OF
AIR QUALITY PERMIT # 47687

*Phoenix Cement Company
Cholla Generating Station-Flyash Handling Facility*

I. INTRODUCTION

This air quality control renewal permit is for the operation of Phoenix Cement Company's fly ash collection, storage and loading facility. This is a stationary facility located at the APS Cholla Power Plant in Joseph City, Navajo County, Arizona. This is a renewal of Air Quality Control Permit Number 28935.

Company Information

1. Mailing Address: Phoenix Cement Company
P. O. Box 428
Clarkdale, AZ 86324
2. Facility Address: APS Cholla Power Plant
Joseph City, AZ 86032

II. FACILITY DESCRIPTION

The Phoenix Cement Company (PCC) flyash facility is located in Navajo County at the Arizona Public Service-Cholla Power Plant.

III. COMPLIANCE HISTORY

There have been twenty file reviews associated with this facility. The most recent report review was completed on November 15, 2007. There are no air quality cases and/or violations associated with this facility.

IV. LEARNING SITE

In accordance with ADEQ's Environmental Permits and Approvals Near Learning Sites Policy, the Department conducted an evaluation to determine if any nearby learning sites would be adversely impacted by the facility. Learning sites consist of all existing public schools, charter schools and private schools the K-12 level, and all planned sites for schools approved by the Arizona School Facilities Board. The learning sites policy was established to ensure that the protection of children at learning sites is considered before a permit approval is issued by ADEQ.

The Department identified one learning site within a two mile radius of Phoenix Cement Company, located at APS Cholla Power Plant, Joseph City, AZ 86032. The learning is Joseph City Jr/Sr High School.

The Department has reviewed the emission sources at the facility and has determined that the operation of the facility will not adversely affect the learning sites.

V. EMISSIONS

Pollutant	Emissions (tpy)
Controlled PM	21.77

VI. APPLICABLE REGULATIONS

The Permittee has identified the applicable regulations that apply to each unit in its permit application. The following table summarizes the findings of the Department with respect to the regulations that are applicable to each emissions unit.

Applicable Regulations

Unit ID	Year of Manufacture	Control Equipment	Applicable Regulations	Verification
Silos, Dust Collectors, Cyclones & Classifiers	1973 1983 1985	Baghouses	<u>A.A.C.</u> R18-2-702.B R18-2-730.B	Standard A.A.C. R18-2-702.B is applicable to all “point source” emission points of fugitive dust. Standard R18-2-730.B is applicable to unclassified sources.
Fugitive Dust Sources	N/A	Water and other reasonable precautions	<u>A.A.C.</u> R18-2-2-702	These standards are applicable to all fugitive dust sources.
Mobile Sources	N/A	Water Sprays/Water Truck for dust control	<u>A.A.C.</u> Article 8	This Article is applicable to off-road mobile sources, which either move while emitting air pollutants or are frequently moved during the course of their utilization.

Unit ID	Year of Manufacture	Control Equipment	Applicable Regulations	Verification
Spray Painting Operations	N/A	N/A	<u>A.A.C.</u> R18-2-727	This standard is applicable to any spray-painting operation.
Demolition/ Renovation Operations	N/A	N/A	<u>A.A.C.</u> R18-2-1101.A.8	This standard is applicable to any asbestos related demolition or renovation operations.
Abrasive Blasting	N/A	N/A	<u>A.A.C.</u> R18-2-726 R18-2-702.B	This standard is applicable to any activity related to abrasion blasting operations.

VII. PREVIOUS PERMIT CONDITIONS

A. Previous Permits

The following table lists the previous permits that have been issued to Phoenix Cement Company.

Previous Permits

Date Permit Issued	Permit #	Application Basis
11/20/03	28935	Operating Permit
5/7/04	32547	Administrative Amendment

B. Previous Permit Conditions

The following are discussions on the previous permits that have been issued to the source.

CLASS II, NON-TITLE V OPERATING PERMIT NO. 28935

This operating permit was issued to Phoenix Cement Company on November 20, 2003, to operate a flyash facility.

OP #28935, References	Determination				Comments
	Revise	Keep	Delete	Stream-line	
Att. A.	X				General provisions - revised to represent most recent language.
Att.B.I.A		X			Facility Wide Requirements-Operating Limitations-Requirement maintained, but language updated to most recent language.
Att B.I.B		X			Facility Wide Requirements-Record Keeping Requirements-Requirements maintained, but language updated to most recent language.
Att B.I.C		X			Facility Wide Requirements-Record Keeping Requirements-Requirements maintained, but language updated to most recent language.
Att B.II		X			Flyash Facility-Particulate Matter-Requirements maintained, but language updated to most recent language.
Att C		X			Equipment List-the equipment has not changed since the last permit list provided.

VIII. MONITORING REQUIREMENTS

A. Flyash Handling Monitoring Requirements

1. A certified EPA Reference Method 9 observer must conduct a monthly survey of visible emissions emanating from the stacks of the baghouses controlling the silos, cyclones, and classifiers. If the opacity of the emissions observed appears to exceed the standard, the observer must conduct a certified EPA Reference Method 9 observation. The Permittee is requested to keep records of the initial survey and any EPA Reference Method 9 observations performed. These records must include the emission point observed, name of the observer, date and time of the observation, and the results of the observation. If the observation results in a Method 9 opacity reading in excess of 20%, the Permittee must report this to ADEQ as excess emissions and initiate appropriate corrective action to

reduce the opacity below 20%. The Permittee must keep a record of the corrective action performed.

2. The Permittee must log all maintenance activities performed on the baghouses.

B. Fugitive Dust Monitoring Requirements

1. The Permittee must maintain records of the dates when any of the activities listed in Conditions III.B.1.a.iii(a) through III.B.1.a.iii(h) of Attachment “B” of the permit are performed and the control measures that are utilized.
2. A certified Method 9 observer must conduct a monthly visual survey of visible emissions from the fugitive dust sources. The Permittee is required to keep a record of the name of the observer, the date and location on when the observation was made, and the results of the observation.
3. If the observer observes a visible emission from a fugitive dust source which on an instantaneous basis appears to exceed applicable opacity standard, the observer must, if feasible, take a six-minute Method 9 observation of the visible emission. If the six-minute opacity of the visible emission is less than or equal to the opacity standard, the observer must make a record of the location, date, time of observation and the results of the Method 9 observation. If the six-minute opacity of the visible emission is more than the opacity standard, the Permittee must adjust or repair the controls or equipment to reduce opacity to below the applicable standard and report the excess emission as described in Section XII.A of Attachment “A” of the permit.

IX. LIST OF ABBREVIATIONS

A.A.C.	Arizona Administrative Code
ADEQ	Arizona Department of Environmental Quality
ft	Feet
hp	Horsepower
hr	Hour
lb	Pound
PM	Particulate Matter
PM ₁₀	Particulate Matter Nominally less than 10 Micrometers
PTE	Potential-to-Emit
TPY	Tons per Year
yr	Year