

**Technical Review and Evaluation of Phoenix Cement Company Application
For
Air Quality Minor Permit Revision Number 42472**

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I. INTRODUCTION

This Class I Minor Revision is being issued to Phoenix Cement Company (PCC), the Permittee, for following changes in the Operating Permit No. 35426.

1. Addition of the following equipment to Table C-1 of Attachment "C" of Permit No. 35426 to upgrade the existing raw meal blending process:

- Air Slide AC-365
- Elevator E-606
- Air Slide AC-610
- Feed Discharge System FDS-606
- Air Slide AC-611
- Silo S-606
- Feed Discharge Air Slide AC-612
- Feed Discharge Bin B-606
- Air Slide AC-613
- Elevator E-607
- Air Slide AC-614

2. Addition of the following equipment to Table C-1 of Attachment "C" of Permit No. 35426 to upgrade the existing raw feed sweetening process:

- Belt Conveyor BC-221
- Belt Conveyor BC-222
- Belt Conveyor BC-223
- Bin B-224
- Bin B-225
- Apron Feeder AF-224
- Apron Feeder AF-225
- Weigh Feeder WF-224
- Weigh Feeder WF-225
- Bin B-226
- Bin B-227
- Apron Feeder AF-226
- Apron Feeder AF-227
- Belt Conveyor BC-226A
- Belt Conveyor BC-226B
- Belt Conveyor BC-227A
- Belt Conveyor BC-227B
- Belt Conveyor BC-211A
- Belt Conveyor BC-211B
- Belt Conveyor BC-205A
- Belt Conveyor DBC-228
- Bin B-228
- Apron Feeder AF-228
- Weigh Feeder WF-228
- Belt Conveyor BC-228

3. Addition of the following dust collectors to Table C-2 of Attachment "C" of Permit No. 35426 to minimize particulate matter emissions from the additional process equipment installed:

Dust collectors for raw feed sweetening process include DC-222, DC-224, DC-225, DC-228A, and DC-228B. Dust collectors for raw meal blending process include DC-608, DC-609, and DC-610, which are part of pneumatic slide system design and considered process equipment.

4. Removal from service of the following equipment from Table C-1 of Attachment "C" of Permit No. 35426:

Belt Conveyor BC-209
Belt Conveyor BC-211
Detachable Trailer TT-204
Belt Conveyor BC-205

II. EMISSIONS

The proposed project will change the PM and PM₁₀ emissions only. The total potential emissions are estimated to be 14.46 tons per year (tpy) PM and 7.77 tpy PM₁₀. These potential to emit (PTE) values are attributed to the new equipment associated with the project, and do not include the emissions reductions to be realized by removal of existing equipment. Please review Tables 2 and 3 of permit application for the PTE calculation details.

III. APPLICABLE REQUIREMENTS

There is no change in the applicable requirement.

IV. MONITORING REQUIREMENTS

There is no change to any of the monitoring requirements as a part of this revision.

V. TESTING REQUIREMENTS

PCC is required to demonstrate initial compliance of the upgraded raw feed sweetening and raw meal blending system with the affected source opacity limit, using EPA Reference Method 9.

VI. MINOR REVISION GATEKEEPERS

The Department has determined that this revision meets the requirements of a minor revision. Class I minor revision may be used only if all of the following listed requirements are satisfied.

1. Changes do not violate any applicable requirement:

The changes in permit conditions do not violate any applicable requirement.

2. The changes do not involve substantive changes to existing monitoring, reporting, or recordkeeping requirements in the permit.

There is no change to any of the monitoring requirements as a part of this revision.

3. The changes do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;

Not applicable.

4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed in order to avoid an applicable requirement to which the source would otherwise be subject. The terms and conditions include:
 - a. A federally enforceable emissions cap that the source would assume to avoid classification as a modification under any provision of Title I of the Act; and
 - b. An alternative emissions limit approved under regulations promulgated under the Section 112(i)(5) of the Act.

Not applicable.

5. The changes are not modifications under any provision of Title I of the Act;

The proposed project is not a major modification because:

- (1) As discussed above, the emissions increase of particulate matter (PM) is estimated to be 14.46 tpy, and that of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀) to be 7.77 tpy. They are less than their significant thresholds of 25 tpy and 15 tpy, respectively; and
 - (2) Modeling was performed and documented in the permit application to verify that the emission rate increases of PM and PM₁₀ will not cause the ambient levels of these pollutants at receptors in the Class I Sycamore Canyon Wilderness Area to increase by 1 microgram per cubic meter (µg/m³) or greater over any 24-hour period. The modeling results presented in the application show the Class I impact to be 0.4 µg/m³ for PM and 0.21 µg/m³ for PM₁₀.
6. There are no changes in fuels not represented in the permit application or provided for in the permit;

Not applicable.

7. The increase in the source's potential to emit any regulated air pollutant is not significant as defined in R18-2-101;

Not applicable.

8. The changes are not required to be processed as a significant revision under R18-2-320.

Not applicable.

