

Lane Regional Air Protection Agency
Minimal Source Air Contaminant Discharge Permit

REVIEW REPORT

Lehigh Northwest Cement Co.

Permit No: 204745

PERMITTING

Permitting Action

1. The permit is an existing facility applying for a renewal of its Air Contaminant Discharge Permit (ACDP).

Other Permits

2. No other permits have been issued or are required by LRAPA for this facility.

Attainment Status

3. The facility is located in an attainment area for all pollutants except PM₁₀ (particulate matter less than 10 microns in size). The Eugene/ Springfield Air Quality Management Area is a non-attainment area for PM₁₀.

SOURCE DESCRIPTION

Overview

4. The facility operates a cement distribution plant at 3300 Marcola Road in Springfield. The facility controls PM (particulate matter)/PM₁₀ (particulate matter less than 10 microns in diameter) emissions by the use of a baghouse. Total annual material handled by the facility is approximately 25,000 tons of Portland cement powder. Baseline Emissions were not set in the permit because the facility is well below the Significant Emission Rates as listed in Title 38 of LRAPA's Rules and Regulations and because the facility did not exist in the baseline year of 1978.

Process and Control Devices

6. Existing air contaminant sources at the facility consist of the following:
 - a. Cement Silo with Baghouse

EMISSIONS

7. The pollutants of concern associated with this source type are PM/PM10. Emissions of PM are estimated to be 1.6 tons per year. Emission calculation details are as follows:

Device/Process	Pollutant	Exhaust Flowrate (cubic feet/min)	*Emission Factor (grains/actual cubic foot)	**Emissions
Baghouse	PM	2166	0.02	43.32 grains/min = 1.6 tons/yr

* PM emission factor is a vendor spec from manufacturer.

** 1 lb = 7,000 grain, 8,760 hours/year, 2000 lbs/ton

MINIMAL PERMIT DETERMINATION

8. LRAPA has determined that the facility qualifies as a minimal source for the following reasons:
- Emissions from this facility are estimated to be less than 5 tons per year of particulate matter and less than 10 tons per year for the criteria gaseous pollutants.

SPECIAL CONDITIONS

9. The facility is required to record the tons of cement distributed per calendar year.

NESHAPS/MACT APPLICABILITY

10. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated.

NSPS APPLICABILITY

11. There are no sources at this facility for which NSPS standards have been promulgated.

PUBLIC NOTICE

Renewal

12. The draft permit was on public notice from July 26, 2007 to August 24, 2007. No comments were submitted during the 30-day comment period.

Max/cmw
9/10/07