



United States Environmental Protection Agency
Region 7
Enforcement and Compliance Assurance Division

Air Branch

Air Branch Inspection Report
Unannounced Full Compliance Evaluation
Audubon Materials LLC - Sugar Creek Cement Plant
2200 Courtney Road
Sugar Creek, MO 64050
FRS# 110012704136

Mailing address:
C T Corporation System, Registered Agent for Audubon Materials LLC
5661 Telegraph Road Ste 4B
St. Louis, MO 63129

Inspection Date(s):
November 13-14, 2024

LUKE
RODRIGUEZ

Digitally signed by LUKE
RODRIGUEZ
Date: 2025.01.06
11:17:03 -06'00'

Luke Rodriguez, Inspector, ECAD, Air Branch

Authorized for Release by:

LANCE AVEY

Digitally signed by LANCE
AVEY
Date: 2025.01.07
10:33:43 -06'00'

Lance Avey, Acting Air Branch Manager, ECAD

11201 Renner Boulevard
Lenexa, Kansas 66219

CONTENTS

INSPECTION OVERVIEW	3
INSPECTION OBJECTIVE	3
FACILITY CONTACT INFORMATION	3
FACILITY OVERVIEW	3
FACILITY OPERATIONS SUMMARY	4
FIELD ACTIVITIES SUMMARY.....	5
INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS	6

TABLES

Table 1. APPLICABLE PERMIT CONDITIONS, REGULATIONS AND STANDARDS.....	3
Table 2. PROJECT TEAM MEMBERS	3
Table 3. FACILITY CONTACT INFORMATION	3
Table 4. FUELS IN USE in CISWI.....	6
Table 5. SUBPART DDDD EMISSION LIMITS AND COMPLIANCE DEMONSTRATION	8

APPENDICES

A - Receipt for Documents (3 pages)
B - Field Photographs (40 pages)
C – Waste Management Plan (12 pages)
D – Operator Training Materials (54 pages)
E – Baghouse Work Orders (1 page)
F – Site-Specific Monitoring Plan (30 pages)
G – CEMS Maintenance Log (19 pages)
H – O&M Plan (19 pages)
I – Daily Opacity Monitoring Record (44 pages)
J – Subpart LLL Site-Specific Monitoring Plan (33 pages)

**This Contents page shows all the sections contained in this report
and provides a clear indication of the end of this report.**

INSPECTION OVERVIEW

INSPECTION OBJECTIVE

The objective of the full compliance evaluation (FCE) inspection was to determine compliance of the facility with the Clean Air Act (CAA), specifically those requirements listed in **Table 1**.

Table 1. APPLICABLE PERMIT CONDITIONS, REGULATIONS AND STANDARDS	
Code of Federal Regulation	Standard Name
40 CFR Part 60	Subpart A, General Provisions Subpart Y, Standards of Performance for Coal Preparation and Processing Plants Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023 Subpart OOO, Standards of Performance for Nonmetallic Mineral Processing Plants Subpart DDDD, Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units
40 CFR Part 63	Subpart A, General Provisions Subpart LLL, National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines
40 CFR Part 52	Title V Operating Permit OP2014-005A, issued by the Missouri Department of Natural Resources (MoDNR) on February 21, 2019.

Table 2 lists the inspection team members.

Table 2. PROJECT TEAM MEMBERS		
Team Member	Organization	Project Role
Luke Rodriguez	EPA Region 7, ECAD, Air Branch	Lead inspector
Christina Kerr	MoDNR, Air Pollution Control	Field team member

FACILITY CONTACT INFORMATION

Table 3 lists the primary facility contact.

Table 3. FACILITY CONTACT INFORMATION		
Name, Title	Phone No.	Email Address
Paul Engel, Environmental Manager	816-257-3657	pengel@centralplainscement.com

FACILITY OVERVIEW

Audubon Materials, Inc. – Sugar Creek Plant is a wholly owned subsidiary of Eagle Materials which is doing business as Central Plains Cement Company. The facility has been in operation

since 2000. The Sugar Creek Plant is a Portland cement manufacturing plant employing about 120 people and operates 24-hours a day, 365 days a year.

The last onsite compliance monitoring activity at the facility was on June 27, 2023, and consisted of a FCE inspection conducted by MoDNR. MoDNR completed a Title V certification review on September 11, 2024.

According to EPA's [Enforcement and Compliance History Online](#) (ECHO) website, there has been no formal enforcement at this facility for at least the past five years. MoDNR issued the following informal enforcement notification to the facility:

MoDNR issued a Notice of Unsatisfactory Findings to the Sugar Creek Plant, on October 9, 2024, for several failures to conduct daily Method 22 observations which were reported in the facility's semi-annual compliance certification. The facility was not required to respond to the Notice.

According to Audubon Materials – Sugar Creek Plant's Title V operating permit issued by MoDNR on February 21, 2019, the facility is subject to the regulations and standards subject to review during this inspection as noted in **Table 1**. Their Title V operating permit states that as of 2019, this facility was a major source of Particulate Matter less than 10 microns (PM10), PM2.5, Sulfur Oxides (SOx), Nitrogen Oxides (NOx), Volatile Organic Compounds (VOC), Carbon Monoxide (CO), and Hazardous Air Pollutants (HAP).

FACILITY OPERATIONS SUMMARY

The Sugar Creek Plant operations include underground mining; raw material crushing, conveying, storage, loading and unloading; solid fuel storage, milling, and transfer; raw mill and preheater/precalciner rotary kiln; clinker cooler; finish mill; finish material conveying, storage, loading and unloading. The kiln, raw mill and coal mill, which exhaust collectively out of the main stack, constitute an existing commercial or industrial solid waste incineration unit subject to the requirements found in 40 CFR 60 Subpart DDDD. The clinker cooler and finish mills are existing units at a portland cement plant and subject to the requirements found in 40 CFR 63 Subpart LLL. All the equipment involved in raw material handling and conveyance, which occurs prior to the transfer to the raw mill, is subject to 40 CFR 60 Subpart OOO. The coal pile and conveyance prior to the coal mill is subject to the requirements of 40 CFR 60 Subpart Y. There are two emergency generator reciprocal internal combustion engines subject to the requirements found in 40 CFR 63 Subpart ZZZZ.

FIELD ACTIVITIES SUMMARY

I arrived at the facility on November 13, 2024, at 9:00 a.m. and completed a drive by surveillance inspection. I did not observe visible emissions. I made entry at the front office at 9:30 a.m. and introduced myself and Ms. Christina Kerr, presented my credentials, and provided my business card to Mr. Paul Engel. We watched a facility safety briefing video. I conducted an opening conference during which I explained that the purpose of the visit was to conduct an inspection to determine compliance with the CAA, specifically, to determine compliance with the regulations and standards listed in **Table 1**. I explained that after asking for some general business information, I would observe emission units and control equipment, and also review associated records demonstrating compliance with the regulations and standards in **Table 1** as well as selected permit conditions. I explained to Mr. Engel that the facility would have an opportunity to make a claim of business confidentiality at the end of the inspection and provided him with a Confidential Business Information (CBI) form. Mr. Engel declined to make a claim of confidentiality until the facility's legal counsel could review the records request. He did not make a claim of confidentiality when uploading the records to the shared file.

The inspection team was given a facility tour by Mr. Engel on November 14, 2024. I wore steel toe boots, safety glasses, and a hard hat as required by the facility safety briefing.

I provided Mr. Engel with an email detailing the records which I wished to review as part of the inspection on November 13, 2024. I told him that I would send him a link to a shared folder to which he should upload the records by the end of the day on November 22, 2024. He signed a Receipt for Documents (**Appendix A**) which detailed this request. Most of the records were uploaded as requested but for the Subpart LLL Operation and Maintenance Plan and Site Specific Monitoring Plan, the facility requested until December 6, 2024. The documents were all uploaded by December 6, 2024.

We left the facility for the day at 1:30 p.m. on November 13, 2024. I returned at 1:30 p.m. on November 14, 2024, to conduct the facility walk-through. We left the facility following the closing conference at 4:00 p.m. I conducted a closing conference with only Mr. Engel and myself. I provided the facility with copies of receipt for documents and the CBI form.

Observations and potential findings from the facility tour, records review, and sampling/measurement activities are noted in the **Investigation Observation and Potential Findings** section below.

INVESTIGATION OBSERVATIONS AND POTENTIAL FINDINGS

Ambient weather, site conditions, and field activities were documented in the field records. All photographs are attached as **Appendix B**. I made the following observations during the inspection. I discussed all observations with facility representatives during the closeout meeting unless otherwise noted in the observation description.

These observations are not final compliance determinations. The EPA Region 7 Air Branch case review team will make the final compliance determinations based on its review of this report and other technical, regulatory, and facility information.

40 CFR 60 Subpart DDDD —Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units

This subpart applies to commercial and industrial solid waste incineration units (CISWIs). The CISWI at the Sugar Creek Plant consists of the preheater/precalciner rotary kiln and the raw mill and coal mill which exhaust through the main stack. **Table 4** below lists the fuels including waste fuels in use at the facility. The table is reproduced from the facility's waste management plan.

Table 4. FUELS IN USE in CISWI		
Type	Solid Waste	Description
Coal	No	Solid fuel
Coke	No	Solid fuel
No. 2 Fuel Oil	No	Or other distillate oils
No. 6 Fuel Oil	No	Or other distillate oils
Rubber Derived Fuels	Yes	Whole, shredded tires, and/or rubber products, including extruded rubber.
Plastic Derived Fuels	Yes	Non-chlorinated based plastic fuels (less than 0.1% chlorine monthly average on an as fed basis), including media services, wrapping, labels, coolers, and automotive carpet.
Used and/or Waste Oils	Yes	This list includes, but is not limited to, crankcase oils from automobiles and trucks, used industrial lubricating oils, and other industrial oils such as oils used for heat transfer, etc.
Textile Products	Yes	This list includes, but is not limited to, face fiber of carpet products typically consisting of nylon or other polymers, a primary backing, an adhesive and a secondary backing, shop rags, and uniforms.
Animal Meal	Yes	This list includes, but is not limited to, dried meat and bone meal, but does not include materials containing any

		horns, hide trimmings, manure, stomach contents, and added blood meal or poultry by-products.
Materials Containing Cellulose	Yes	This list includes, but is not limited to, sawdust, wood chips, paper, cardboard, and seed.
Gases from a Landfill Operation	Yes	From nearby Courtney Ridge Landfill.
Petroleum Coke Slag	Yes	Refinery byproduct

40 CFR 60.2620 – Waste Management Plan

40 CFR 60 Subpart DDDD requires a subject facility to prepare and operate in accordance with a waste management plan. The waste management plan must include the elements listed in 40 CFR 60.2630. The facility's waste management plan is included as **Appendix C**. The plan appears to contain all the required elements.

40 CFR 60.2635 – Operator Training Requirements

40 CFR 60 Subpart DDDD limits the operation of CISWIs to qualified operators. Mr. Engel told me that the facility maintains about 10 qualified operators, and generally, two are on-site at all times. Qualification requires the completion of either a state-approved program or other training course which includes the elements in 40 CFR 60.2635(c). The Sugar Creek Plant has elected to prepare and conduct their own training, meeting those requirements. The training materials are provided as **Appendix D**. The training materials appear to contain all the required elements.

40 CFR 60.2640, 60.2645, 60.2650 – Maintaining Operator Qualifications

Operators must complete an annual refresher of the training materials to maintain their qualification. The Sugar Creek Plant elects to conduct an annual training and provide the test for all qualified operators. I reviewed the test records of the most recent refresher which was conducted in March of 2024.

40 CFR 60.2670 – Emission Limitations

Emission standards are listed in **Table 2** of Subpart DDDD which is modified below and included as **Table 5** to this report.

Table 5. SUBPART DDDD EMISSION LIMITS AND COMPLIANCE DEMONSTRATION			
Pollutant	Emission Limitation	Compliance Method	Notes on Sugar Creek Compliance
Cadmium	0.004 milligrams per dry standard cubic meter	Performance test (Method 29 of Appendix A).	Testing completed on September 13 and 14, 2023. Result was 0.0002 milligrams per dry standard cubic meter.
Carbon monoxide (CO)	157 parts per million by dry volume	Performance test (Method 10, 10A, or 10B of Appendix A).	Demonstrating compliance with CO Continuous Emissions Monitoring System (CEMS).
Dioxins/furans (toxic equivalency basis)	0.41 nanograms per dry standard cubic meter	Performance test (Method 23 of Appendix A).	Testing completed on September 13 and 14, 2023. Result was 0.0033 nanograms per dry standard cubic meter.
Hydrogen chloride (HCl)	62 parts per million by dry volume	Performance test (Method 26 or 26A of Appendix A).	Demonstrating compliance with a tunable diode laser (TDL) as a CPMS for HCl.
Lead	0.04 milligrams per dry standard cubic meter	Performance test (Method 29 of Appendix A).	Testing completed on September 13 and 14, 2023. Result was 0.000 milligrams per dry standard cubic meter.
Mercury	0.47 milligrams per dry standard cubic meter	Performance test (Method 29 or 30B at of Appendix A) or ASTM D6784-02 (Reapproved 2008).	Demonstrating compliance with Mercury Sorbent Traps.
Opacity	10 percent	Performance test (Method 9 of Appendix A).	Not demonstrating compliance with Opacity standard. See discussion below.
Nitrogen oxides (NOx)	388 parts per million by dry volume	Performance test (Methods 7 or 7E of Appendix A).	Demonstrating compliance with NOx CEMS.
Particulate matter	70 milligrams per dry standard cubic meter	Performance test (Method 5 or 29 of Appendix A).	Testing completed on September 13 and 14, 2023. Result was 2.3 milligrams per dry standard cubic meter. Also, the facility uses a CPMS for monitoring compliance.
Sulfur dioxide (SO2)	20 parts per million by dry volume	Performance test (Method 6 or 6c of Appendix A).	Demonstrating compliance with SO2 CEMS.

Mr. Engel told me that the facility is not conducting an annual opacity test nor are they operating a continuous opacity monitor. According to 40 CFR 60.2670(b), “Units that do not use wet scrubbers must maintain opacity to less than or equal to the percent opacity (three 1-hour blocks consisting of ten 6-minute average opacity values) specified in table 2 of this subpart, as applicable.” The Sugar Creek Plant is not using a wet scrubber. 40 CFR 60.2690(i) states that “If you have an applicable opacity operating limit, you must determine compliance with the opacity limit using Method 9 at 40 CFR part 60, appendix A-4, based on three 1-hour blocks consisting of ten 6-minute average opacity values, unless you are required to install a continuous opacity monitoring system, consistent with § 60.2710 and § 60.2730.” 40 CFR 60.2710(b) states:

“You must conduct an annual performance test for the pollutants listed in table 2 of this subpart or tables 6 through 9 of this subpart and opacity for each CISWI as required under § 60.2690. The annual performance test must be conducted using the test methods listed in table 2 of this subpart or tables 6 through 9 of this subpart and the procedures in § 60.2690. Opacity must be measured using EPA Reference Method 9 at 40 CFR part 60. Annual performance tests are not required if you use CEMS or continuous opacity monitoring systems to determine compliance.”

Elsewhere, in 40 CFR 60.2675(h), there is a reference to “either a particulate matter CEMS or a particulate matter CPMS.” This indicates that the CPMS in use by the facility for monitoring PM compliance is not equivalent to the CEMS referenced in 40 CFR 60.2710(b) for the purposes of this regulation, and therefore, the facility should be conducting annual Method 9 tests on their CISWI.

40 CFR 60.2710 – Demonstrating Compliance with Emission Limitations and Operating Limits

40 CFR 60.2710(k) requires the facility to conduct an annual inspection of the air quality control device(s) which includes the requirements in (k)(1) and (2). I requested the most recent annual inspection record. In response, the facility provided screenshots of the maintenance work orders for the baghouse for the calendar year of 2024. The photo of the work order log is provided as **Appendix E**. The maintenance work orders specify whether each entry is preventative or corrective. There is a single entry which reads “preventative,” and the description is “QUARTERLY T/C INSPECTION 44 BAGHOUSE.” This inspection does not have any date in the scheduled date column, and the date of its occurrence was November 15, 2024. There are no other entries which read QUARTERLY T/C INSPECTION 44 BAGHOUSE despite the range of the records covering the period from April 5, 2024, to November 17, 2024. The facility did not provide any record of the inspection, and I was unable to determine in what capacity the inspection evaluated the proper operation of the air pollution control device. The facility also did not provide any records of repairs which occurred as a result of the inspection which should have been completed within 10 days of the inspection. The facility should produce a record of the annual inspection. Without a specific inspection record, there is no way to determine whether the facility adequately resolved the issues discovered during the inspection.

40 CFR 60.2710(l) requires that the facility develop a site specific monitoring plan for each CMS. I received a copy of the site specific monitoring plan as part of this inspection, and it is included as **Appendix F**. The plan must meet the requirements in 40 CFR 60.2710(l)(1), as well as conduct a performance evaluation as specified in 40 CFR 60.2710(l)(2), and the facility must continuously operate according to the plan as specified in 40 CFR 60.2710(l)(3). The plan that was provided to me was completed in November of 2017. Section 7 on the operating and

maintenance procedures is unspecific. The plan says only that “Routine inspections, cleaning and other maintenance activities as prescribed by the manufacturer are conducted daily, weekly, monthly or at a different frequency as scheduled in the facility’s preventative maintenance system.” 40 CFR 60.2710(l)(1)(iv) requires that the plan include the “Ongoing operation and maintenance procedures.” The statement from that plan indicates only that they will follow the manufacturer prescribed activities which is not the same thing as detailing operation and maintenance procedures. Further, the facility provided a list of the maintenance activities conducted on the CEMs equipment. This list of maintenance activities is included as **Appendix G**. These maintenance records are inclusive of all CMS equipment. There were 74 records over the timeframe from December 2, 2022, to November 19, 2024. This would indicate that the manufacturer’s prescribed activities do not include any daily, weekly, or even monthly activities as there are no entries in the CEMs maintenance logbook report records corresponding to any regular recurring activities, and there are not enough entries for these to include weekly or monthly activities. The facility provided records of cylinder gas audits and RATAs which appear to correspond to the monitoring plan. A record of daily calibrations was also provided.

40 CFR 60.2740 specifies the recordkeeping requirements for the CISWI unit. I requested the records required under 40 CFR 60.2740(b)(1 – 7). The facility provided two records; one was titled ASF records and indicates an hourly value of something which is not labeled, and the other which is titled CISWI Records which shows only the hourly clinker production. The record provided by the facility appears to be an excel document which was not properly translated to a PDF document, and it is not clear which records were available and which were not as the only column visible is Clinker Production. The facility explained in their submittal cover letter that “it should be noted that the Company experienced a corporatewide network failure in early May 2024 lasting almost the entire month, during which some limited historical records were lost.” Presumably the records for 40 CFR 60.2740(b)(1), the CISWI charge dates, times, weights, and hourly charge rates should have been available from June to November of 2024.

40 CFR 63 Subpart LLL—National Emission Standards for Hazardous Air Pollutants From the Portland Cement Manufacturing Industry

40 CFR 63 Subpart LLL applies to only the clinker cooler, five finish mills and associated control equipment. According to Mr. Engel, the facility does not have any raw material dryers or open clinker storage piles. Raw Mills 1, 2, and 3 are located at the Old Plant Site, and Raw Mill 4 and 5 are located proximate to the kiln.

40 CFR 63.1347 – Operation and Maintenance Plan (O&M Plan)

I requested the O&M Plan indicated in 40 CFR 63.1347 in my initial records request made by email on November 13, 2024. In the Cover Letter to response submitted on November 22, 2024, the facility stated only that “CPC proposes to provide this information in a supplemental submittal no later than December 6, 2024.” The O&M Plan was submitted on December 6, 2024. The plan, however, is dated November 2024, and under Section 1.1 Document Control, the plan states that the November 2024 Revision is Revision number 1, and the plan is a “New Plan.” This plan is included as **Appendix H**. The plan is required to have procedures for the proper operation and maintenance of the affected source and control equipment. This plan only indicates that “A preventative maintenance schedule for the processing and pollution control equipment is maintained in the Plant’s electronic database. The schedules and task lists for equipment are based on past experience with similar equipment, employee knowledge, and manufacturing documentation and/or recommendations.” I also requested records of maintenance activities specified in the O&M Plan which were required to be completed in 2023 and 2024. The facility provided a screen shot of the maintenance activities which occurred from June 24, 2024, to October 29, 2024. Only one of these items is listed as “preventative,” the rest are recorded as corrective.

40 CFR 63.1350(f) – Opacity Monitoring Requirements

40 CFR 63.1350(f)(2) specifies requirements for daily visible emission observations of finish mills in accordance with the procedures of Method 22 of Appendix A-7 to 40 CFR 60. Observations were conducted except where the facility has reported a failure to conduct an observation as indicated in their Semi-Annual Monitoring Reports. However, the record of the observations are not consistent with the procedures of Method 22. An example of the record form they are using is included as **Appendix I**. Method 22 of Appendix A-7 to 40 CFR 60 indicates what information is required on the field data sheet in Sections 11.2 Field Records, 11.4 Observations, and 11.5 Recording Observations. This information includes:

- “the estimated wind speed, wind direction, and sky condition”
- a “Sketch the process unit being observed, and note the observer location relative to the source.”
- “Record the accumulated time of the observation period on the data sheet”
- “record the clock time the observation period began and ended, as well as the clock time any observer breaks began and ended”

The record provided indicates time in a very general sense such as 9 pm or 12 pm. The frequency of these recordings occurring at exactly on the hour are implausible and most likely not the exact time that the observation began.

40 CFR 63.1350(p) specifies a requirement for the facility to develop and operate in accordance with a Site-Specific Monitoring Plan (SSM Plan). I requested this plan in my initial records request made by email on November 13, 2024. In the Cover Letter to response submitted on November 22, 2024, the facility stated only that “CPC proposes to provide this information in a supplemental submittal no later than December 6, 2024.” The SSM Plan was submitted on December 6, 2024. The plan, however, is dated November 2024. This plan is included as **Appendix J**. I also requested maintenance records for all activities which were required by the plan. The cover letter to the records submittal indicates that these records are included in with the other CEMS maintenance records, and the discussion of those records is discussed above in the section pertaining to 40 CFR 60.2710(l). As above, this plan is also lacking specificity, and a determination of compliance with unspecific provisions or procedures is not possible.

40 CFR 60 Subpart OOO —Standards of Performance for Nonmetallic Mineral Processing Plants

40 CFR 60 Subpart OOO applies to all raw material handling which occurs prior to the raw mill. Mr. Engel told me that this equipment was installed in when the plant was initially constructed, and none of the equipment has been modified or replaced since that time. There are no wet suppression systems or baghouses used to comply with the requirements of 40 CFR 63 Subpart OOO. The equipment was subject to an initial performance test which the facility was unable to locate.

40 CFR 60 Subpart Kb —Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984, and On or Before October 4, 2023

The facility has one 8,000 gallon gasoline tank and a smaller aqueous ammonia tank. Neither of these tanks meets the applicability for 40 CFR 60 Subpart Kb.

40 CFR 60 Subpart Y —Standards of Performance for Coal Preparation and Processing Plants

Equipment subject to 40 CFR 60 Subpart Y includes the coal storage pile and coal conveyors. The coal mill is subject to 40 CFR 60 Subpart DDDD. The equipment was subject to an initial performance test which the facility was unable to locate.

40 CFR 63 Subpart ZZZZ —National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The facility uses two emergency generators. One is called the Operations – Mine engine and is located near the mine; the other is the Operations – Kiln engine and is located near the kiln. I reviewed the recorded hours of operation for these engines going back to 2020, and neither has exceeded the usage limitations found in 40 CFR 63.6640(f)(1)-(4). The facility also provided records of maintenance conducted in 2023 and 2024.

Permit Condition 10 from February 21, 2019 Title V Permit OP2014-005A

Emission Limitation #2 requires the facility to limit the cumulative 12-month throughput for the limestone stockpile to less than 1,336,900 tons. I requested a record demonstrating compliance with this requirement. The record provided indicates that the facility has not exceeded this level in any of the 12-month periods from December 2021 to October 2024.

Permit Condition 20 from February 21, 2019 Title V Permit OP2014-005A

Permit Condition 20 specifies maximum allowable usage levels for alternate fuels in Table 1 to Permit Condition 20 in the February 21, 2019, Title V Permit OP2014-005A. The facility provided a document which shows the 12 – month rolling usage for rubber derived fuel, plastic derived fuel, and cellulose materials. The document does not show any exceedance of these limits in any 12 - month period from December 2021 to October 2024.

Permit Condition 21 from February 21, 2019, Title V Permit OP2014-005A

Permit condition 21 specifies usage limitations for Wastewater Treatment Biproducts (WWTBs). Mr. Engel told me that the facility applied for a permit for this waste type but eventually changed their mind after getting the permit and have not used any WWTBs in the past five years.

Potential Finding 1: The facility is not conducting annual Method 9 tests on their CISWI unit.
Observation Summary: Method 9 tests are required when the operator is not using a PM CEMs to monitor emissions from the unit.
Citation: 40 CFR 60.2690(i)
Evidence: Mr. Engel told me that the facility does not conduct an annual Method 9 tests on the CISWI. There is no Method 9 observation included in the 2023 annual performance test record.
Description of Observation: See discussion of this issue on pages 8 and 9 under 40 CFR 60.2670 – Emission Limitations.

Potential Finding 2: The record of the required annual inspection is inadequate.
Observation Summary: The facility is required to conduct an annual inspection of the air quality control device(s).
Citation: 40 CFR 60.2710(k)
Evidence: Appendix E - Baghouse Work Orders
Description of Observation: Discussion of this potential finding is located above on page 9 under 40 CFR 60.2710 – Demonstrating Compliance with Emission Limitations and Operating Limits.

Potential Finding 3: The records of the CEMs maintenance provided by the facility do not correspond to the requirements in the SSM Plan.
Observation Summary: The facility is required to operate and maintain the monitoring equipment in accordance with the SSM Plan.
Citation: 40 CFR 60.270(l)
Evidence: Appendix F – SSM Plan and Appendix G – CEMS maintenance log
Description of Observation: Discussion of this potential finding is located above on page 9 under 40 CFR 60.2710 – Demonstrating Compliance with Emission Limitations and Operating Limits.

Potential Finding 4: Operation and Maintenance Plan under 40 CFR 63.1347 did not exist at the time of the inspection.
Observation Summary: The facility is required to develop and operate in accordance with an O&M Plan. This plan was created in November of 2024 following my inspection.
Citation: 40 CFR 63.1347
Evidence: Appendix H – O&M Plan
Description of Observation: Discussion of this potential finding is located above on page 11 under 40 CFR 63.1347 – Operation and Maintenance Plan (O&M Plan).

Potential Finding 5: Method 22 observations lack information required by Method 22.
Observation Summary: The facility is required to conduct observations in accordance with Method 22 of Appendix A-7 to 40 CFR 60.
Citation: 40 CFR 63.1350(f)(2)

Potential Finding 5: Method 22 observations lack information required by Method 22.
Evidence: Appendix I – Daily Opacity Monitoring Records
Description of Observation: Discussion of this potential finding is located above on page 11 under 40 CFR 63.1350(f) – Opacity Monitoring Requirements.

Potential Finding 6: Site Specific Monitoring Plan under 40 CFR 63.1350(p) did not exist at the time of the inspection.
Observation Summary: The facility is required to develop and operate in accordance with an SSM Plan. This plan was created in November of 2024 following my inspection.
Citation: 40 CFR 63.1350(p)
Evidence: Appendix J – Subpart LLL Site Specific Monitoring Plan
Description of Observation: Discussion of this potential finding is located above on page 12 under 40 CFR 63.1350(f) – Opacity Monitoring Requirements.

End of report.