

**CITY of OMAHA
AIR QUALITY CONTROL**

Notice is given to the public according to Chapter 41 of the Omaha Municipal Code of the application of Audubon Materials dba Central Plains Cement to obtain a minor air emission construction permit for their cement terminal at 1106 Ida St, Omaha. There will be no change in potential emissions as a result of this project.

No significant impact on air quality is expected from the operation of this facility. Douglas County is in attainment with air quality standards for the listed pollutants. Approval is recommended with the condition that any pollution control equipment that may be necessary for compliance with the City of Omaha or Nebraska Air Pollution Control Rules and Regulations will be installed within 180 days after notification by the City of noncompliance.

All information submitted by the applicant and the proposed approval by Air Quality Control are available for inspection by the public at the office of Omaha Air Quality Control from January 20, 2021 to February 20, 2021. Comments received during that period will be considered. During that period the applicant, or any interested person or group of persons, may request or petition the Control Officer for a public hearing, and state the nature of the issues to be raised and all arguments and factual grounds supporting their position. The Control Officer may hold a public hearing if the comments, requests, or petitions raise legal, policy or discretionary questions and significant public interest exists with respect to the application. Comments should be mailed to:

John Finlan Mayne
Public Works
Air Quality Control
5600 S. 10th Street
Omaha, NE 68107
402-444-3915



City of Omaha

Public Works Department

Air Quality Division
5600 South 10th Street
Omaha NE 68107-3501
Phone: (402) 444-6015
Telefax: (402) 444-3904

MINOR CONSTRUCTION

AIR EMISSION PERMIT

FOR

**AUDUBON MATERIALS LLC dba
CENTRAL PLAINS CEMENT COMPANY LLC
1106 Ida Street
Omaha, NE 68112**

Effective Date: Placeholder Date, 2021

Omaha Air Quality Control
5600 S. 10th Street
Omaha, NE 68107-3501
(402) 444-3915

SOURCE IDENTIFICATION

OMAHA AIR QUALITY CONTROL CONSTRUCTION PERMIT

Class I, Permit No. C-21-1-00150

Issue Date: Placeholder Date, 2021

Effective Date: Placeholder Date, 2021

In accordance with the provisions of the Omaha Municipal Code, Chapter 41 - Air Quality Control,

Audubon Materials LLC
15100 E. Courtney Atherton Road
Sugar Creek, MO 64058

is authorized to construct the emission units shown in Table A-1 at:

1106 Ida Street
Omaha, NE 68112

The equipment indicated is subject to the terms and conditions shown in Table A-2 and to the other terms and conditions specified in this permit.

The permit is issued pursuant to and consistent with the requirements of Title 129, Chapter 17 of the Nebraska Department of Environmental Quality and the Omaha Municipal Code, Section 41-2, which incorporates Nebraska DEQ Title 129, Chapter 17: Construction Permits.

Each condition is followed by the source of the authority for said condition.

Superseded Construction Permit

This construction permit supersedes construction permit C17100150 (issued April 26, 2017) in its entirety.

PERMIT APPROVAL

The granting of a permit to construct a source shall not affect the responsibility of the owner or operator to comply with applicable provisions of the State Implementation Plan (SIP) and any other local, state, or federal requirements. The application is approved and construction permit is granted.

Signed: _____

John Finlan Mayne (OAQC Officer)

Table A-1

Table A-1: Emission Unit Identification and Description				
Emission Unit Number	Emission Unit Description	Make/Model	Size	Control
EU-01	Truck Unloading to Silos	N/A	100 tons/hr	Baghouse CE01
EU-08	Barge Unloading to Silos	N/A	198.4 tons/hr	
EU-09	Railcar Unloading to Silos	N/A	100 tons/hr	

Table A-2

Table A-2: Emission Unit Emission Limits and Work Practice Standards				
Emission Unit Number	Pollutant/Parameter	Emission Limit/ Work Practice Standard	Permit Condition	Monitoring Requirements
EU-01 EU-08 EU-09	Baghouse	<ul style="list-style-type: none"> Shall be in operation during unloading operations to capture and control particulate emissions. 	Specific Condition 1.b.	Recordkeeping

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SPECIFIC CONDITIONS

1. Emission Limits / Work Practice Standards

- 1.a.** [No alternative scenarios are identified in this permit.]
- 1.b.** Emission units EU-01, EU-08 and EU-09 shall not operate unless the filterable particulate emissions are being captured and controlled by the baghouse [CE01] as follow:
 - 1.b.i.** the baghouse shall be installed, operated and maintained and shall be operating according to manufacturer's instructions whenever the corresponding emission units are in operation; [Voluntary limit]
 - 1.b.ii.** all baghouse-associated capture and air-handling equipment shall be in good repair and operating according to manufacturer's instructions to allow emissions to be controlled by the baghouses; [Voluntary limit]
 - 1.b.iii.** each baghouse compartment shall have a functioning gauge that measures the pressure drop. Each gauge shall be properly installed, operated, calibrated and maintained. The static pressure drop across the baghouse shall be maintained within the following range: 2.0 to 6.0 inches H₂O; [Omaha Municipal Code, Section 41-2, incorporating NDEE regulation, Title 129, Chapter 34.008.03]
 - 1.b.iv.** the baghouses shall be observed at least once a day to determine whether there are any visible emissions related to baghouse operation; [Omaha Municipal Code, Section 41-2, incorporating NDEE regulation, Title 129, Chapter 34.008.03] and
 - 1.b.v.** corrective action shall be initiated as soon as practicable whenever there are any deviations from the above operation of the baghouse. The permittee shall have spare filters and other related equipment located on-site to facilitate rapid repair. [Omaha Municipal Code, Section 41-2, incorporating NDEE regulation, Title 129, Chapter 34.008.03]

2. Testing Requirements

- 2.a.** Testing requirements are not applicable to any emission units at this source.

3. Monitoring Requirements

- 3.a.** The Permittee shall monitor the baghouse operations on a daily basis as required by Specific Condition 4.a. [Omaha Municipal Code, Section 41-2, incorporating NDEE regulation, Title 129, Chapter 34.008.03]

4. Record Keeping Requirements

- 4.a.** A log of baghouse operations shall be maintained and shall be updated daily for the baghouse [CE01] in accordance with Specific Condition 1.b. The logs shall include the following information:
 - 4.a.i.** baghouse compartment identification;
 - 4.a.ii.** operational condition and effectiveness of the baghouse-associated capture and air-handling equipment;
 - 4.a.iii.** the daily pressure drop reading;
 - 4.a.iv.** the results of the daily visual emissions check;

- 4.a.v.** the date and time of all maintenance, including preventive maintenance, and each fabric filter replacement and the initials of the person conducting the inspections, maintenance, and filter replacement;
 - 4.a.vi.** any occurrence of the pressure gauge readings falling outside of the general operating range indicated in Specific Condition 1.b.iii. shall be noted in the log as a deviation;
 - 4.a.vii.** any occurrence of visible emissions related to the baghouse and the baghouse-associated capture and air-handling equipment shall be noted in the log as a deviation; and
 - 4.a.viii.** for any deviation recorded in 4.a.i. through 4.a.vii; a recording of the date and time corrective action was initiated, the probable cause of the deviation, any corrective actions taken and any preventative measures taken (if any) to prevent the deviation from occurring in the future per Specific Condition 1.b.v. [Omaha Municipal Code, Section 41-2, incorporating NDEE regulation, Title 129, Chapter 34.008.03].
- 4.b.** All records required herein and support information shall be maintained on site for inspection and shall be retained for a period of five years. [Omaha Municipal Code, Section 41-2, incorporating NDEE regulation, Title 129, Chapter 34.008.03]

5. Reporting Requirements

- 5.a.** The permittee shall complete and submit to OAQC an annual deviation report. The report shall list all instances of deviations from permit requirements. The report shall list the probable cause for the deviation and corrective actions or preventive measures taken. If there were no deviations to report, the permittee shall submit a statement to that effect as their report. The due date for the annual report shall be January 30th of each year. The report shall cover the preceding calendar year. [Omaha Municipal Code, Section 41-2, incorporating NDEE regulation, Title 129, Chapter 34.008.03]
- 5.b.** The permittee shall report all deviations from permit requirements, the probable cause of such deviations, and any corrective action or preventative measures taken. The deviations shall be reported within the following time frames: [Omaha Municipal Code, Section 41-2, incorporating NDEE regulation, Title 129, Chapter 34.008.03]
- 5.b.i.** Any deviation resulting from emergency or upset conditions shall be reported within 2 working days of the date on which the permittee first becomes aware of the deviation if the permittee wishes to assert the affirmative defense authorized under Chapter 11 of Nebraska Title 129; [Omaha Municipal Code, Section 41-2, incorporating NDEE regulation, Title 129, Chapter 34.008.03]
 - 5.b.ii.** Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported as soon as it is practicable; [Omaha Municipal Code, Section 41-2, incorporating NDEE regulation, Title 129, Chapter 34.008.03] and
 - 5.b.iii.** All deviations shall be reported in the permittee's annual deviation report. [Omaha Municipal Code, Section 41-2, incorporating NDEE regulation, Title 129, Chapter 34.008.03]
- 5.c.** All reports submitted to OAQC shall be submitted with a certification by the responsible official that meets the requirements of Omaha Municipal Code, Section 41-2, Chapter 7.008. Reports submitted under Specific Conditions 5.b.i and 5.b.ii may be submitted initially without a certification by a responsible official if an appropriate certification is provided within ten days thereafter, together with any corrected or supplemental information required concerning

the deviation. [Omaha Municipal Code, Section 41-2, incorporating NDEE regulation, Title 129, Chapter 34.008.03]

Omaha Air Quality Control
5600 S. 10th Street
Omaha, NE 68107
(402) 444-6015

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BASIS OF PERMIT

Audubon Materials LLC dba Central Plains Cement Company LLC
1106 Ida Street
Omaha, NE 68112

DESCRIPTION OF THE FACILITY AND AFFECTED UNITS:

Central Plains Cement Company is a cement terminal. The 4 digit Standard Industrial Classification (SIC) Code for the facility is 5032.

The facility was constructed in 1961 and receives portland cement for local distribution. The design capacity of the plant is 100 tons/hour.

The proposed construction will result the following equipment:

<u>Unit Number</u>	<u>Unit Description</u>	<u>Max Rate</u>
EU-01	Existing Truck Unloading to (5) Cement Silos with New Baghouse CE-01	100 tons/hr cement
EU-08	Existing Barge Unloading to (5) Cement Silos with New Baghouse CE-01	198.4 tons/hr cement
EU-09	New Railcar Unloading to (5) Cement Silos with New Baghouse CE-01	100 tons/hr cement

DESCRIPTION OF THE PERMIT ACTIVITY:

Central Plains Cement submitted a minor construction permit for the above units on December 23, 2020. The facility has a synthetic minor operating permit (#O1600150SM) which was issued October 27, 2016. This operating permit will have to be modified to include the new equipment after it has commenced operation.

SUMMARY OF EMISSION UNITS:

The plant is a cement terminal. The cement is currently unloaded by truck into silos 1-5. The particulate emissions for this process are controlled with a baghouse. The facility is planning to add the capability to unload cement by railcar into silos 1-5. The current baghouse will be used to control particulate emissions from truck, barge and railcar unloading into the silos. Potential emissions were calculated for the receiving operations using emission factors available from EPA’s WebFIRE. Baghouses are used to control particulate emissions from unloading operations.

SUMMARY OF PERMIT LIMITS:

The proposed construction permit includes the following limits:

1. Particulate emissions from the truck, barge and railcar receiving are to be controlled by the existing baghouse.

TYPE AND QUANTITY OF AIR CONTAMINANT EMISSIONS ANTICIPATED:

Uncontrolled particulate emissions from the new process would be:

<u>Regulated Pollutant</u>	<u>PTE (tpy)</u>
PM	319.74
PM-10	205.86

Controlled particulate emissions from the new process will be:

<u>Regulated Pollutant</u>	<u>PTE (tpy)</u>
PM	0.91
PM-10	0.91

There will be no actual increase in overall potential emissions from this project. The unloading equipment will produce the same emissions from all three possible modes.

APPLICABLE REQUIREMENTS :

This permit is a minor construction permit.

The permit conditions specific to the proposed permit are as follows:

1. Emission Limits / Work Practice Standards

- 1.a. This condition states that there are no alternative scenarios for this source.
- 1.b. The permittee has chosen to control the filterable particulate emissions from the unloading operations with a baghouse. This condition states that operational limit. This is a local, state and federal requirement.

2. Testing Requirements

- 2.a. There are no testing requirements.

3. Monitoring Requirements

- 3.a. This condition requires that baghouse operations be monitored in order to make the voluntary limit enforceable. This is a local, state and federal requirement.

4. Recordkeeping Requirements

- 4.a. This condition requires that a record of baghouse operations be kept in order to make the voluntary limit enforceable. This is a local, state and federal requirement.
- 4.b. This condition requires that all records required herein and support information be kept on site and be available for inspection. This is a local, state and federal requirement.

5. Reporting Requirements

- 5.a. This condition requires an annual deviation report be submitted. This is a Local, State and Federal requirement.
- 5.b. This condition requires reporting of any permit deviation. This is a Local, State and Federal requirement.
- 5.c. This condition requires all reports submitted to OAQC shall include a certification by the responsible official. This is a Local, State and Federal requirement.

STATUTORY OR REGULATORY PROVISIONS:

Ambient Air Quality Standards [Omaha Municipal Code, Section 41-2, Chapter 4]-

No modeling is required because the estimated increase in criteria pollutants for this project is less than the thresholds established in NDEQ dispersion modeling guidance.

Construction Permits [Omaha Municipal Code, Section 41-2, Chapter 17]-

The units require a minor construction permit because permitted potential emissions exceed those thresholds.

NSPS [Omaha Municipal Code, Section 41-2, Chapter 18]-

The units are not subject to any NSPS regulation.

PSD [Omaha Municipal Code, Section 41-2, Chapter 19]-

The facility is not considered major for future PSD permitting purposes because permitted potential emissions do not exceed those thresholds.

Particulate Emissions [Omaha Municipal Code, Section 41-2, Chapter 20, Section 002]-

The facility is expected to comply with this regulation because the main sources of particulate matter (receiving operations) are being controlled with a baghouse.

Opacity [Omaha Municipal Code, Section 41-2, Chapter 20, Section 004]-

The facility is expected to comply with this regulation because the main sources of particulate matter (receiving operations) are being controlled with a baghouse.

Sulfur Compound Emissions [Omaha Municipal Code, Section 41-2, Chapter 24]-

The facility is expected to comply with this regulation because no fuels are being combusted.

Acid Rain [Omaha Municipal Code, Section 41-2, Chapter 26]-

The facility is not subject to Acid Rain requirements because it does not produce electricity for sale.

State T-BACT [Omaha Municipal Code, Section 41-2, Chapter 27]-

The units are not subject to Nebraska T-BACT requirements because permitted potential emissions do not exceed those thresholds.

NESHAP [Omaha Municipal Code, Section 41-2, Chapter 28]-

The units are not subject to any MACT regulation.

CAM [Omaha Municipal Code, Section 41-2, Chapter 31]-

The units are not subject to CAM standards because the source is not a Title V source.

Emission Sources- Testing & Monitoring [Omaha Municipal Code, Section 41-2, Chapter 34]-

The facility is not subject to testing and COMS requirements because there are no boilers with a rated capacity that exceeds 250 MMbtu/hr.

PROCEDURES FOR FINAL DETERMINATION:

The public notice, as required under NAQR Chapter 14, shall be published on January 20, 2021. Persons or groups shall have 30 days from that issuance of public notice (February 21, 2021) to provide the OAQC with any written comments concerning the proposed permit action and/or to request a public hearing, in accordance with NAQR Chapter 14. Persons having comments or requesting a public hearing may contact:

John Finlan Mayne
Air Quality Engineer
Air Quality Control Division
Omaha Public Works Department
5600 S 10th Street
Omaha NE 68107

If no public hearing is requested, the permit may be granted at the close of the 30-day comment period. If a public hearing is requested, the Director may choose to extend the date on which the permit is to be granted until after that public hearing has been held.

Telephone inquiries may be made at: (402) 444-3915