



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

June 21, 2023

Ms. Jackie Padgett
Senior Area Environmental Manager
Carmeuse Americas – Longview Operation
599 Highway 31 South
Saginaw, Alabama 35137

Dear Ms. Padgett:

This is in response to your letter dated October 19, 2022, requesting approval of an alternative monitoring procedure (AMP) for Title 40, Code of Federal Regulation (C.F.R.), Part 63, Subpart AAAAA—National Emission Standards for Hazardous Air Pollutants (NESHAP) for Lime Manufacturing Plants, as it applies to Kiln #3 operated by Carmeuse Americas at its Longview Operation (Longview) in Saginaw, Alabama. Based on our review of available information, your AMP is acceptable, subject to specific conditions. Details regarding the AMP and the basis for our determination are provided in the remainder of this letter.

On July 24, 2020, the U.S. Environmental Protection Agency (EPA) finalized a residual risk and technology review (RTR) conducted for the Lime Manufacturing source category regulated under NESHAP (85 FR 44960), which included promulgation of new standards related to periods of startup, shutdown, and malfunction (SSM). For periods of startup, the EPA has established opacity emission limits for kilns equipped with fabric filters (FFs) or electrostatic precipitators (ESPs).

Kiln #3 was manufactured in 1969 and installed at Longview in 1976. As a result, Kiln #3 is an existing “lime kiln” under Subpart AAAAA. Kiln #3 is a 500 tons-per-day Fuller model production unit with a rated feed-input processing capacity of 91,667 lbs/hr of limestone, capable of producing 200,750 tons-per-year of quick-lime products. Emissions from the kiln are controlled by a dust cyclone followed by a Fuller Model 6000-12 Module, positive-pressure fabric-filer baghouse (290 bags per module) discharging through 12 individual monovents.

Under 40 C.F.R. § 63.7082(e), an *existing lime kiln* is any lime kiln, and (if applicable) its associated lime cooler, for which construction or reconstruction began on or before December 20, 2002. Under 40 C.F.R. § 63.7090(c), on or after January 20, 2021, you must meet each startup and shutdown period emission limit in Table 2 to Subpart AAAAA that applies to you. Under Table 2 to Subpart AAAAA, Startup and Shutdown Emission Limits for Kilns and Coolers, for all new and existing lime kilns and their associated coolers equipped with an FF or an ESP: 1) during each startup, emissions must not exceed 15 percent opacity (based on startup period block average), and 2) during each shutdown, emissions must not exceed 15 percent opacity (based on 6-minute average opacity for any 6-minute block period not exceeding 15 percent). Under Table 2, you have demonstrated compliance, if after following the requirements in 40 C.F.R. § 63.7112, you have installed, maintained, calibrated and operated a continuous opacity monitoring system (COMS) as required by 40 CFR Part 63, Subpart A, General Provisions and according to PS–1 of Appendix B to Part 60 of this chapter, except as specified in 40 C.F.R. § 63.7113(g)(2), and you have collected the COMS data at a frequency of at least once

every 15 seconds, determining block averages for each startup period and demonstrating for each startup block period the average opacity does not exceed 15 percent. Similarly, under Table 2, you have demonstrated compliance, if after following the requirements in 40 C.F.R. § 63.7112, you have installed, maintained, calibrated and operated a COMS as required by 40 CFR Part 63, Subpart A, General Provisions and according to PS-1 of Appendix B to Part 60 of this chapter, except as specified in 40 C.F.R. § 63.7113(g)(2), and you have collected the COMS data at a frequency of at least once every 15 seconds, determining block averages for each 6-minute period and demonstrating for each 6-minute block period the average opacity does not exceed 15 percent.

Under 40 C.F.R. § 63.7143, startup means "... the beginning of kiln operation. Startup begins when a shutdown kiln begins firing fuel in the main burner. Startup ends when the lime kiln first generates on-specification lime product or 12 hours following first discharge from the kiln, whichever is earlier." Shutdown means "... the cessation of kiln operation. Shutdown begins when feed to the kiln is reduced below planned production quantities and ends when stone feed is halted and fuel combustion from the main burner ceases."

Under 40 C.F.R. § 63.7114 and 40 C.F.R. § 63.7121(f), for existing lime kilns and their associated coolers, you may perform visible emissions measurements in accordance with the EPA Method 9 of Appendix A to Part 60 in lieu of installing a COMS if: (1) you use a FF for PM control, and the FF is under positive pressure and has multiple stacks; or (2) the control device exhausts through a monovent; or (3) the installation of a COMS in accordance with PS-1 of Appendix B to Part 60 is infeasible.

Your request for approval of an AMP for opacity during startup and shutdown periods was submitted under provisions in 40 C.F.R. § 63.8(f) and your application contains a description of the proposed AMP which addresses the four elements contained in the definition of monitoring in 40 C.F.R. § 63.2: 1) indicator(s) of performance, 2) measurement techniques, 3) monitoring frequency, and 4) averaging time. Additionally, you have presented information related to the impracticality/infeasibility of using a COMS for the given circumstances (startups and shutdowns).

Based upon our review, we concur that a COMS is an impractical/infeasible monitoring option for kiln #3's baghouse operating under positive pressure and discharging to multiple stacks (12 each monovents). Therefore, conducting visible emission observations would be an acceptable site-specific alternative to a COMS for Kiln #3's baghouse discharge monovents under the following conditions:

1. Longview must conduct visible emission observations in accordance with EPA Method 9:
 - i. Startup:
 - a. Begin 6-minute average Reference Method (RM) 9 readings after Kiln #3 begins firing fuel in the main burner.
 - b. Thereafter, conduct 6-minute average RM 9 readings every four hours until Kiln #3 produces on-specification lime product or 12 hours following the first discharge from the kiln, whichever is earlier.
 - ii. Shutdown:
 - a. Begin 6-minute average RM 9 readings when feed to Kiln #3 is reduced below planned production quantities.
 - b. Thereafter, conduct 6-minute average RM 9 readings every four hours until stone feed is halted and fuel combustion from the main burner ceases.
2. If any individual 15-second Method 9 reading exceeds 15 percent opacity, Longview must continue making readings until the opacity either drops below 15 percent for eight

consecutive 15-second readings or a violation of the Subpart AAAAA opacity limit is confirmed.

3. When violations of the applicable opacity standard are identified, Longview must take immediate steps to identify the cause of the violation and bring Kiln #3's emissions control baghouse into compliance.

4. Longview must maintain records of visible emission readings, the cause of any violations, and the actions taken to correct exceedances. This information must be included with the deviation reports required under 40 C.F.R. § 63.7131.

Please note that our approval does not alter Longview's obligations to meet all other applicable NESHAPs, including, but not limited to, the following NESHAP general provisions:

- The requirement to maintain and operate affected facilities and associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions, per 40 C.F.R. § 63.6, and

- The prohibition against concealing emissions which would otherwise constitute a violation of an applicable standard, including the use of gaseous diluents to achieve compliance with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere, per 40 C.F.R. § 63.4.

This AMP approval was coordinated with the EPA's Office of Enforcement and Compliance Assurance and Office of Air Quality Planning and Standards. If there are any questions concerning this response, please contact Tracy Watson of my staff at (404) 562-8998 or watson.marton@epa.gov.

Sincerely,

CAROLINE
FREEMAN

Digitally signed by CAROLINE FREEMAN
Date: 2023.06.21 16:24:36 -0400

Caroline Y. Freeman
Director
Air and Radiation Division

cc: Sara Ayres, EPA OECA
Morgan Everitt, EPA OECA
Ronald Gore, ADEM
Robert Scinta, EPA OECA
Brian Story, EPA OAQPS