

Facility Name: **Argos Cement LLC**
City: Atlanta
County: Fulton
AIRS #: 04-13-121-00401

Application #: TV-831460
Date Application Received: July 23, 2024
Permit No: **3241-121-0401-V-09-0**

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Facility Identification**

1. Facility Name:

Argos Cement LLC.

2. Parent/Holding Company Name

Argos Cement LLC.

3. Previous and/or Other Name(s)

This facility was originally built and operated by Martin Marietta in the 1960s. Blue Circle Cement operated the facility from 1983 to September 2001 when it was acquired by Lafarge North America. Ownership of the facility was transferred to Argos Cement LLC in October 2011.

4. Facility Location

2520 Paul Avenue, NW
Atlanta, Georgia 30318 (Fulton County)

5. Attainment, Non-attainment Area Location, or Contributing Area

The facility is located in the Atlanta area which was redesignated to attainment for the 2015 ozone standard.

B. Site Determination

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
3241-121-0401-V-08-0	January 24, 2020	Title V renewal.
Off-Permit Change Application No. 28880	May 15, 2023	Repurpose the existing clinker storage silos, improve existing dust collection system and upgrade belt conveyor and railcar unloading systems.
Off-Permit Change Application No. 29144	December 21, 2023	Use of synthetic gypsum in the cement manufacturing process and the installation of a new hopper and belt conveyor to transport synthetic gypsum into the process.

D. Process Description

1. SIC Codes(s)

3241.

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

The facility manufactures Portland cement.

3. Overall Facility Process Description

Clinker, finished cement, and other raw materials are received at the plant. Clinker, gypsum and other additives are ground in two finish mills to produce cement. Specialty cement products are blended and packaged in two packing lines. Cement is shipped out in bags or in bulk trucks. Limestone and/or slag cement is ground and dried in a separate finish mill system and shipped out in bulk trucks.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Argos Cement LLC is presently classified as a major stationary source as defined by the federal, *Prevention of Significant Air Quality Deterioration* (PSD) regulation, 40 CFR 52.21. Specifically, it has the potential to emit more than 250 tons per year of particulate matter and PM10 (particulate matter less than or equal to 10 micrometers aerodynamic diameter).

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓	✓		
PM ₁₀	✓	✓		
PM _{2.5}	✓	✓		
SO ₂	✓			✓
VOC	✓			✓
NO _x	✓			✓
CO	✓			✓
TRS	✓			✓
H ₂ S	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

The plant ceased to produce cement clinker and did shut down its last cement kiln in December 2004. This rendered the facility being a minor source for hazardous air pollutants (HAPs) because, per 40 CFR 63.6585(b & c), it does not have the potential to “*emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams).*” Therefore, this plant is no longer subject to 40 CFR 63 Subpart LLL, *National Emission Standards for Hazardous Air Pollutants from the Portland Cement Manufacturing Industry*, which applies to major sources of hazardous air pollutants.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	No
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	No
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

Facility-wide air quality applicable rules include the general requirements of 40 CFR 60, *New Source Performance Standards* (NSPS), and the general provisions of Georgia Rule 391-3-1-.02(2)(a) which are cited, primarily, in Section 8 of the enclosed permit.

C. Compliance Status

Title V renewal Application No. TV-831460 does not indicate that the facility is operating out of compliance with the rules and regulations.

D. Permit Conditions

Conditions 2.2.1 refer to the applicable general provisions of NSPS. No other facility-wide conditions are included in the permit other than the general provisions in Part 8 of the enclosed permit and Rule 391-3-1-.02(2)(a), which apply to all air contaminant sources.

III. Regulated Equipment Requirements

A. Equipment List for the Process

The Table in Section 3.1 of the enclosed permit has been updated to reflect existing equipment and changes made through off-permit changes.

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
Finish Mills				
EU208	Finish Mill No. 3 System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 64	D29, D38	Baghouses
EU209	Finish Mill No. 3 Separator/Conveyor System		D39	Baghouse
EU505	Finish Mill No. 1 System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 64	D70	Baghouse
EU506	Finish Mill No. 1 Separator System		D49	Baghouse
EU513	Finish Mill No. 2 System	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 64	D33	Baghouse
EU514	Finish Mill No. 2 Separator / Conveyor System		D32	Baghouse
Conveyors				
EU107	Clinker Reclaim System Raw Silo Belt #5	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D44	Baghouse
EU110	Clinker Reclaim Raw Silo 21		D43	Baghouse

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
EU504	Finish Mill No. 1 Conveyor	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D51, D52, D53	Baghouses
EU511	Finish Mill No. 2 Conveyor		D26, D28, D31	Baghouses
Silos & Associated Units				
EU300	Slag Silos 1 & 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D77, D81	Baghouses
EU317	Raw Silo 7 (8, 10, 11, 12)		D22	Baghouse
EU509	Raw Silos 18 & 19	40 CFR 60 Subpart F 391-3-1-.02(2)(e)	D17	Baghouse
EU601	Finish Silos 1,7 and Interstices 13, 14	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D02	Baghouse
EU603	Raw Silos 20 and 21		D24	Baghouse
EU604	Finish Silo & Interstices 38		D11, D35	Baghouses
EU605	Finish Silos 29, 30, 31		D13	Baghouse
EU607	Finish Silo 9B		D07	Baghouse
EU608	Finish Silos 2, 3		D04	Baghouse
EU609	Finish Silos 10,11, 12		D09	Baghouse
EU610	Finish Silo 6		D05	Baghouse
EU611	Raw Silo 22		D12	Baghouse
EU612	Raw Silos 23, & Finish Silo 24		D14	Baghouse
EU613	Finish Silo 26, 27, 28		D23	Baghouse
Loading & Unloading Operations				
EU100	Clinker Reclaim at Crusher	40 CFR 60 Subpart F 391-3-1-.02(2)(e)	D46	Baghouse
EU621	South Truck Loading Spout	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D01	Baghouse
EU622	South Bulk Tank	391-3-1-.02(2)(b) 391-3-1-.02(2)(e) 40 CFR 64	D90, D93	Baghouses
EU623	North Bulk Tank	391-3-1-.02(2)(b) 391-3-1-.02(2)(e)	D94	Baghouse
EU624	North Truck Loading Spout		D75	Baghouse
Other Equipment				
EU616	Cement/Pigment Mixing System	40 CFR 60 Subpart F 391-3-1-.02(2)(e)	D37, D58, D60, D65, D67, D68, D69, D71, D91, D92 D48, D99	Baghouses
EU617	Fugitive Line No. 1	40 CFR 60 Subpart F 391-3-1-.02(2)(e)	D59, D95	Baghouses
EU618	White Cement M Pump		D61	Baghouse
EU619	Packing Pumps/Conveyors West		D63	Baghouse
EU620	Packing Pumps/Conveyors East		D64	Baghouse
EU318	S1-S2 Loadout		D97	Baghouse
EU625	Rail CUL Elevator		D82, D86	Baghouses
EU626	N/S/Front Center & Back Basement M Pump Hopper		D83, D87, D88, D96	Baghouses
EU631	Fugitive Line No. 2		D98	Baghouse

B. Equipment & Rule Applicability

Emission and Operating Caps:

Section 3.2 of the enclosed permit establishes limits meant to avoid 40 CFR 52.21, *Prevention of Significant Deterioration (PSD) of Air Quality*.

Rules and Regulations Assessment:

Raw Silos 18 & 19 (EU509) are subject to 40 CFR 60 Subpart F, *Standards of Performance for Portland Cement Plants*, which applies to equipment that commences construction or modification after August 17, 1971. 40 CFR 60 Subpart F prohibits the discharge, or causing the discharge, into the atmosphere, from any raw mill system, finish mill system, raw mill dryer, raw material storage, clinker storage, finished product storage, conveyor transfer points, bagging and bulk loading and unloading systems, any gases which exhibit ten percent opacity, or greater. 40 CFR 60 Subpart F provisions regulating emissions from kilns and clinker coolers are no longer applicable to this facility.

C. Permit Conditions

The enclosed renewal permit carries over the conditions of Title V permit No. 3241-121-0401-V-08-0. However, equipment listing in Condition 3.2.2 and Table 3.1 have been updated to reflect existing equipment and changes made through, the below mentioned, off-permit changes. A typographical in the opening paragraph of Condition 5.2.5 has been corrected. Also, minor changes have been made to Attachment B, *Insignificant Activities Checklist*. Argos Cement LLC requested making changes to Conditions 5.2.2 and 5.2.5 to, chiefly, decrease the frequency of measuring and recording the pressure drop across each baghouse from daily to weekly. This requirement is mandated on similar sources and this request has not been granted. Also, the company stated in Application No. 831460:

i. *The Plant submitted an off-permit change notification to GEPD on May 15, 2023. The change notification included the following:*

- The repurposing of existing Raw Silos 18 & 19 (EU509), Finish Silos 20 and 21 (EU603) and Finish Silo 22 (EU611) for the raw storage of clinker.
- The conversion of Finish Silo 23 (EU612) to raw storage for stone handling.
- The modification of the railcar unloading systems and upgrade of the associated belt conveyor systems to handle the transfer of clinker at the plant.

The repurposing of the Silos allows the raw storage of clinker to provide additional incremental throughput to Finish Mill No. 2 (EU513 and EU514) and to improve the Dust Collection Systems at various clinker transfer points. A GEPD approval was issued on June 13, 2023. The Plant is requesting these changes be incorporated into the TVOP. The TVOP application renewal forms located in Appendix A include the modified emissions units, along with the appropriate emissions point information in Section F of the GEOS forms.

ii. Moreover, TV-831460 stated: *“The Plant submitted an off-permit change notification to GEPD on December 21, 2023. The change notification included the use of synthetic gypsum in the cement finishing process and the installation of a new hopper and belt conveyor to transport synthetic gypsum into the process. A GEPD approval was issued on February 8, 2024. The Plant is requesting these changes be incorporated into the TVOP. The TVOP application renewal forms*

located in Appendix A include the new emissions unit, along with the appropriate emissions point information in Section F of the GEOS forms.”

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

None applicable (required initial performance tests have been completed). Notwithstanding, the enclosed permit allows certain changes to be made to the facility without permit revision. These changes may include installing new equipment and replacing existing equipment and Condition 4.2.1 is meant to require initial performance test be performed in accordance with 40 CFR 60.8 and the applicable NSPS Subpart.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

To reasonably assure compliance with applicable PM limitations related to the 40 CFR 52.21 avoidance limits in Section 3.2, 40 CFR 60 Subpart F and Georgia Air Quality Rules, a visible emissions (VE) check is required each day of operation of the emissions units controlled by the baghouses. Corrective actions are required for visible emissions that exceed a specified opacity action level. In addition, a Preventive Maintenance Program is required on these baghouses. The program requires weekly monitoring of baghouse pressure drop and the performance of operation and maintenance checks on the baghouses. The company is required to keep the VE and Preventative Maintenance Program information in order to submit to the Division upon request. Excursions, to be reported semiannually, are specified.

C. Compliance Assurance Monitoring (CAM)

Under 40 CFR 64, the Compliance Assurance Monitoring Regulations (CAM), facilities are required to prepare and submit monitoring plans for certain emission units with the Title V application. Each

emission unit controlled by a control device that *"has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source,"* as defined by 40 CFR §64.2(a)(3) is subject to CAM. CAM applicability calculations indicate that the following pollutant specific emission units (PSEU) were found to be subject to the CAM.

There are no changes in applicable emission sources, monitoring criteria, or procedures from the previous version of the plan. Therefore, sources subject to CAM are being carried over from current permit No. 3241-121-0401-V-08-0.

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

VII. Specific Requirements**A. Operational Flexibility**

Condition 7.1.1 contains general operational flexibility provisions.

B. Alternative Requirements

None applicable.

C. Insignificant Activities

See Permit Application on GEOS website.

See Attachment B of the permit

D. Temporary Sources

None applicable.

E. Short-Term Activities

None applicable.

F. Compliance Schedule/Progress Reports

None applicable.

G. Emissions Trading

None applicable.

H. Acid Rain Requirements

None applicable.

I. Stratospheric Ozone Protection Requirements

None applicable.

J. Pollution Prevention

None applicable.

K. Specific Conditions

None applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.

Addendum to Narrative

The 30-day public review started on January 15, 2025, and ended on February 14, 2025. Comments were not received by the Division. Accordingly, I recommend issuing the permit without changes to its draft format.