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Title V Air Operating Permit Renewal Application

The information requested in this document must be provided for a complete application. Please submit to the Northwest Clean Air Agency (NWCAA) one paper copy and one electronic copy of the completed application. The certification at the end of this document applies to the entire submittal. If additional room to reply is required, please attach pages to this request.

In some cases, a prior submittal to the NWCAA (e.g., the annual emissions inventory) may include information requested below. If you would like to refer the NWCAA to that information rather than provide the information here, please note this in your response. Any submittal to which the NWCAA is referred will become part of your renewal application. It is also acceptable to attach relevant portions of your current Air Operating Permit if the information therein provides an adequate response to a question below.

Part 1: General Information

- 1) Company name and address [or plant name and address if different from the company name]
[Lehigh Northwest Cement Company](#)
[741 Marine Drive](#)
[Bellingham, WA 98225](#)
- 2) Current Air Operating Permit number and expiration date
[Permit #: 022R1](#)
[Issued: July 7, 2017](#)
[Expiration: July 7, 2022](#)
- 3) Owner's name and agent
[Lehigh Northwest Cement Company](#)
- 4) Responsible Official name and address
[Kent Stuehmer - Vice President, Cement](#)
[7777 Ross Road](#)
[Delta, BC V4G 1B8](#)
- 5) Telephone number and name of plant site manager/contact
[David Parsons - Plant Manager, \(360\) 733-6720](#)
[741 Marine Dr](#)
[Bellingham WA, 98225](#)
- 6) Were there any changes to the facility impacting air emissions since receiving the current Air Operating Permit? [if yes, please describe changes]
[No changes.](#)

Part 2: Process and Emissions Information

- 7) Will there be any changes to the operating scenario(s) identified in the current AOP?

No changes.

- 8) Provide a description of process and products by Standard Industrial Classification (SIC) Code. Please list the applicable SIC Code. Please repeat the list of processes and products for each alternative operating scenario.

This site is cover under SIC 3241: Cement, Hydraulic. The industrial activity at this site is limited to grinding cement clinker into cement powder.

- 9) Please list any and all pollutants that would cause the facility to be classified as a "major source" as defined in WAC 173-401.

This site is classified as an area source.

- 10) Please identify and describe all points of emissions at the facility except those that qualify as insignificant emission units or activities as defined in WAC 173-401-530. Are these emissions units correctly identified and defined in the current AOP? If not, please note the requested changes below.

The emissions units are correctly identified in the current AOP. There have been no changes.

- 11) Please list and quantify all emissions of regulated air pollutants from the emission points identified in item 10 above. Please include calculations. If the most recent annual emissions inventory accurately describes these emissions, it is not necessary to repeat the same information here. Please refer the NWAPA to the most recent annual emissions inventory.

Please reference the most recent annual emissions inventory.

- 12) List the fuels used and their respective usage rates at design capacity for the emission points identified in item 10 above.

N/A.

- 13) List the raw materials used and their respective usage rates at design capacity for the emission points identified in item 10 above.

Clinker, Limestone, Gypsum. No change from current AOP.

- 14) List the production rate at design capacity for the emission points identified in item 10 above.

N/A

- 15) Identify the facility operating schedule (anticipated operating hours per day, days per week, weeks per year)

24 hours/day, 3 days/week, 52 weeks/year

- 16) Please identify all air pollution control equipment at the facility. Is this air pollution control equipment correctly identified and defined in the current AOP? If not, please provide information necessary to correct.

All equipment is correctly identified in the current AOP.

- 17) Please identify and describe all compliance monitoring devices or activities at the facility.

Monitoring is completed by reading magnehelic pressure differential gauges and conducting visual inspections.

- 18) Identify any limitations on source operation that affect emissions of a regulated pollutant. Similarly, list any work practice standards that affect emissions of a regulated pollutant at this facility.

There are no limitations on source operation that affect emissions of regulated pollutants.

Part 3: Applicable Requirements

- 19) Cite and describe all applicable requirements. An updated copy of the applicable requirements in the current AOP for the facility may be sufficient.

There are no changes to the applicable requirements in the AOP.

- 20) Please list any applicable test method(s) for determining compliance with each applicable requirement listed in item 19 above. An updated copy of the current AOP for the facility may be sufficient.

No changes.

- 21) Does the applicant propose any exemptions from an otherwise applicable requirement? If so, please explain.

There are no proposed exemptions.

- 22) Does the CAM rule (40 CFR part 64) apply to any of the emissions units?

N/A. Site is not a major source.

- 23) Does the accidental release prevention regulation (40 CFR part 68) apply to the facility?

No.

- 24) Do the federal Acid Rain rules (40 CFR parts 72-78) apply to any of the emissions units?

No.

- 25) Are there any requested changes to any condition in the current Air Operating Permit? [if yes, identify the condition, the requested change, and the reason]

No.

- 26) If the applicant would like to request that the permit shield be extended to cover certain requirements that the applicant believes are inapplicable, please list those requirements, below. Please include a brief narrative description of each requirement and the basis for the belief that each is inapplicable.

N/A.

Part 4: Compliance Status and Certification

- 27) Describe the compliance status of the facility with regard to all applicable requirements. Compliance status for each applicable requirement shall be described as "continuous" or "intermittent". Please include the method used for determining compliance. If an annual compliance certification has been recently submitted to the NWCAA, the applicant may reference this report. However, if the applicable requirements or compliance status have changed since that submittal, an updated submittal is required.

Compliance at this facility is continuous. Please reference the annual compliance certification.

- 28) Provide the following:

- a) For applicable requirements with which the source is in compliance, provide a statement that the source will continue to comply with such requirements;

The site will continue to maintain compliance with applicable requirements at each source.

- b) For applicable requirements that become effective during the permit term, provide a statement that the source will meet such requirements on a timely basis;

The site will meet any requirements that may become applicable during the permit term.

- c) For applicable requirements with which the source is not in compliance at the time of permit issuance, provide a narrative description and provide a schedule of compliance. Such a schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the source will be in noncompliance at the time of permit issuance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based;

N/A.

- d) For sources required to have a schedule of compliance to remedy a violation, provide a schedule for submission of certified progress reports every six months or at a more frequent period if specified in an applicable requirement; and

N/A.

Statement of Certification: *Based on information and belief formed after reasonable inquiry, the statements and information in this document and any attachments are true, accurate and complete.*

Kent Stuehmer

Vice President - Cement

Name of designated responsible official

Title of responsible official



27/07/2021

Signature of responsible official

Date