

## STATEMENT OF BASIS

To: Reviewers  
Through: Lori Bocchino, Operating Permit Program Manager  
From: Brian Fehr, Air Quality Engineer  
Subject: Draft Chapter 6, Section 3 Operating Permit 3-2-098-1, Mountain Cement Company  
Date: July 29, 2014

Attached for your review is the draft modified Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-2-098-1 for the Mountain Cement Plant located south of Laramie, WY. The operating permit is being modified to update applicable requirements that have changed since the issuance of permit 3-2-098 on May 4, 2012.

On March 28, 2012, the Air Quality Division updated WAQSR Chapter 14, Section 3 for the Sulfur Dioxide Milestone Inventory, to revise measurement techniques and baseline date language. The Mountain Cement Plant is subject to these requirements.

Chapter 6, Section 3(d)(vii) of Wyoming Air Quality Standards and Regulations (WAQSR) requires the Division of Air Quality to reopen the operating permit if additional applicable requirements under the Act become applicable to a source with a remaining permit term of 3 or more years. On October 30, 2013, the Mountain Cement Company was notified that the Division intended to reopen operating permit 3-2-098 to revise applicable requirements from WAQSR Chapter 14, Section 3.

Several waivers have been issued for this facility since the issuance of permit 3-2-098. The waivers in the following paragraph have no remaining applicable requirements, but are included to document the permit history for the facility:

AP-13429 (5/24/12) allowed for a 60 day test use of calcium filter cake as a raw material and to test for fluoride emissions. AP-14150 (12/13/12) authorized the temporary outside storage of ferrous granules. This waiver expired on May 1, 2013. Division Letter (1/9/13) allowed for the replacement of the Kiln 1 stack due to structural decay. The stack was replaced in April of 2013. AP-14841 (5/17/13) authorized a 60 day test use of fly ash/bottom ash as a raw material. Waiver wv-15002 (7/10/13) authorized a temporary iron dross (slag) storage pile. This waiver expired on October 31, 2013. AP-15604 (11/29/13) extended the timeframe for testing the addition of fly ash/bottom ash that was originally authorized in waiver AP-14841. This waiver expired on May 29, 2014. AP-15701 (12/6/13) allowed the temporary outside storage of ferrous granules at the facility. This waiver expired May 1, 2014. AP-16219 (4/21/14) extended the authorization to store ferrous granules outside for an additional 120 days beyond what was originally allowed for in AP-15701.

Applicable requirements are incorporated from the following waivers:

Waiver AP-13877 (9/25/12): authorized the permanent use of calcium filter cake as a raw material. The permittee shall maintain records that the calcium filter cake is an approved water treatment residual under the Solid and Hazardous Waste Division's (SHWD) "Beneficial Use Determination" for the facility.

Waiver wv-15658 (12/16/13), corrected (3/24/14): allows the addition of 40,000 tons of clinker to the outside clinker storage pile. The clinker shall be 3/8 inch or greater in size. This temporary pile is also subject to conditions from permit MD-9022. The waiver was corrected to clarify when condition 5 of MD-9022 will apply.

The operating permit revisions include the following:

- Table of Contents: Sections were repaginated as necessary. Appendix F is reserved, as the Division no longer attaches regulations to the operating permit.
- General Information: the Responsible Official reference is reserved to be consistent with operating permits currently issued by the Division.
- Source Emission Points Table: waiver wv-15658 Corrected is added for the clinker storage pile.
- Condition F2: paragraph (c) is revised to include applicable requirements from wv-15658 Corrected, temporarily allowing outside storage of additional clinker.
- Condition F7: calcium filter cake is added to the raw materials allowed, as specified in waiver AP-13877.
- Condition F19: a reference to waiver wv-15658 Corrected is added, as the waiver also required the recordkeeping requirements addressed in paragraph (c).
- Condition F22: included recordkeeping requirement documenting the calcium filter cake is an approved water treatment residual under the SHWD's "Beneficial Use Determination" in paragraph (c) and renumbered the subsequent paragraph.
- Condition F26: a notification requirement is added as paragraph (d) for the outdoor clinker storage pile and renumbered the subsequent paragraph.
- Condition F32: is revised to reflect current WAQSR Chapter 14, Section 3 baseline data requirements.
- Compliance Assurance Monitoring (CAM) Requirements: the cross reference to Appendix F is removed, as the Division no longer attaches regulations to the operating permit.
- Compliance Certification and Schedule: recordkeeping requirements are added to paragraph (xix) for the calcium filter cakes.
- Condition S1: updated to indicate current state ambient standards.
- Summary Tables: reflects changes in the operating permit conditions for Kiln #1 and #2 raw material requirements.
- Abbreviations: updated to be consistent with abbreviations currently used by the Division.
- Appendix F: is reserved.