

**SECTION L**  
**AIR EMISSIONS STANDARDS**

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## **SECTION L – AIR EMISSIONS STANDARDS**

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## SECTION L – AIR EMISSIONS STANDARDS

### 1.0 AIR EMISSION STANDARDS FOR PROCESS VENTS

The 40 CFR Part 264 Subpart AA regulations require air emission controls for process vents associated with distillation, fractionation, thin-film evaporation, solvent extraction, or air or stream stripping operations that manage hazardous wastes with organic concentrations of at least 10 ppmw. Central Plains Cement Company (CPCC) does not operate any of these units; therefore, the requirements of this subpart are not applicable to this facility.

### 2.0 AIR EMISSIONS FROM EQUIPMENT LEAKS

A fugitive emissions detection program has been implemented at the CPCC plant in accordance with 40 CFR Part 264, Subpart BB and O.A.C. 252:205-3-2(f). Subpart BB is applicable to equipment that contains or contacts hazardous wastes with organic concentrations of at least ten (10) percent-by-weight and that are managed in a hazardous waste management unit. Generally, the equipment subject to the requirements of this subpart are valves, pumps, compressors, pressure relief devices, sampling connection systems, open-ended valves or lines, flanges, and other connectors associated with the transfer of Fuel Quality Waste (FQW) from Systech Environmental Corp. (Systech). FQW is stored at the co-located Systech facility and is transferred via pipeline to the CPCC kilns. The FQW within the CPCC plant is assumed to contain more than ten (10) percent organics and is a light liquid; therefore, equipment associated with FQW is subject to the Subpart BB requirements. In addition, all FQW-associated equipment subject to the Subpart BB standards is assumed to be in contact with the hazardous waste for more than 300 hours per year.

Attachment L-1 is an example list of the CPCC equipment subject to the Leak Detection and Repair Program (LDAR) of Subpart BB. Each piece of equipment at CPCC subject to Subpart BB is marked with an identification number that corresponds with this list. Any revisions to this list will be maintained by CPCC in the facility record, including the LDAR program.

All of this equipment may be found associated with the piping coming from and returning to the Systech storage facility. The property line between the CPCC and Systech properties forms the basis for determining whether a particular item is considered to belong to CPCC or Systech and is included in this list. The example table includes the following information:

Tag Number:	The identification number tag for the component.
Drawing Number:	Location of the equipment on a map of the facility.
Class	Component type (pump, valve, etc.)
Location/Equipment Type:	Description of equipment subject to LDAR
Area:	Where the component is located
Physical State:	Hazardous waste state at the equipment (LL = light liquid or GV = gaseous/vapor).

Changes to this table are maintained in the CPCC facility operating record and permit application modifications will not be made to update this table in the application.

The method of compliance for each type of equipment is discussed as follows:

- Open-ended valves or lines – Each open-ended valve or line is equipped with a cap, blind flange, plug, or second valve, which is in place to seal the opening except during operations requiring waste to flow through the line.
- Valves in light liquid service – Each valve in light liquid service is periodically monitored to detect leaks. An instrument reading of 10,000 ppm or greater above the background identifies a leak. Valves are monitored monthly until no leaks are detected for two successive months; at which time the valves are monitored the first month of each quarter. First attempts to repair valves identified to be leaking are made as soon as practicable, but no later than within 5 calendar days, and repairs are completed within 15 calendar days.
- Flanges and other connectors – These items are monitored within 5 calendar days if evidence of a potential leak is found by visual, audible, olfactory, or other detection methods. The monitoring is conducted using Method 21 of 40 CFR Part 60 Appendix A, and a leak is detected if an instrument reading of 10,000 ppm or greater above the background is measured. First attempts to repair components identified to be leaking are made as soon as practicable, but no later than within 5 calendar days, and repairs are completed within 15 calendar days.

Documentation of the required periodic monitoring may be conducted by CPCC or Systech personnel. If the monitoring is conducted by Systech personnel, the results are kept in the Systech Operating Record.

Pursuant to 40 CFR 264.1064(m), CPCC has elected to determine compliance with the applicable portions of Subpart BB by performing the required monitoring and inspections in compliance with the relevant provisions of 40 CFR Part 61, Subpart V, which is applicable to equipment in volatile hazardous air pollutant service, including the FQW equipment. Systech is subject to the monitoring and inspection requirements of 40 CFR Part 63, Subpart DD and is responsible for monitoring all FQW equipment for both Systech and CPCC. As such, the documentation of compliance with 40 CFR 61, Subpart V and/or 40 CFR 63.691 (Subpart DD), governing air emissions from equipment leaks is maintained in the facility Operating Record as allowed by 40 CFR 264.1064(m).

Attachment L-2 contains the certification that the equipment subject to 40 CFR 264, Subpart BB is monitored and records are maintained in accordance with the requirements of 40 CFR 61, Subpart V and/or 40 CFR 63, Subpart DD.

### **3.0 AIR EMISSION STANDARDS FOR TANKS, SURFACE IMPOUNDMENTS AND CONTAINERS**

With certain exceptions, 40 CFR Part 264 Subpart CC is applicable to facilities that treat, store, or dispose of hazardous waste in containers, tanks, or surface impoundments subject to the provisions of 40 CFR Part 264, Subparts I, J, or K, respectively. CPCC does not operate any of these units; therefore, the requirements of this subpart are not applicable to this facility.

Attachment L-2 includes a certification that the requirements of 40 CFR 264, Subpart CC are not applicable to the equipment managed by CPCC.

## **4.0 CERTIFICATION OF COMPLIANCE WITH HWC-MACT REGULATIONS**

CPCC operates two dry process rotary kilns to produce Portland cement from raw limestone, sand, shale and various raw material substitutes. One of the fuels fed to both kilns is FQW (hazardous waste). In addition, the cement kilns serve as control devices for air emissions from the Systech tanks and equipment subject to 40 CFR 264, Subparts BB and CC. Air emissions from the kilns are regulated under a Title V air permit which includes the emission limits of 40 CFR 63, Subpart EEE, Hazardous Waste Combustor-Maximum Achievable Control Technology (HWC-MACT). Pursuant to 40 CFR 270.22, CPCC chooses to demonstrate compliance with the air emission standards and the requirements of 40 CFR 63, Subpart EEE by performing a comprehensive performance test (CPT) and submitting a Notification of Compliance under 40 CFR 63.1207(j) and 63.1210(d) for the kilns. This testing is performed every five years. The results of the testing are submitted to the O.D.E.Q as a "Notification of Compliance" with the air permit requirements. A copy of the Notification of Compliance and all data developed to support this document are maintained in the CPCC records. A copy of the most recent Notification of Compliance is included in Section D Attachment D-2.

# **ATTACHMENT L-1 SUBPART BB TAGS**

**EXAMPLE CPCC SUBPART BB TAGS**

TAG NUMBER	DRAWING NUMBER	CLASS	LOCATION / EQUIPMENT TYPE	AREA	PHYSICAL STATE
P001KP1	KP2	PUMP	Discflo Pump	Kiln Pump 1	LL
P001KP2	KP2	Pump	Discflo Pump	Kiln Pump 2	LL
P001KBP	KP1	PUMP	Middle Discflo Pump	Kiln Pump	LL
P001EU	Truck 2	PUMP	Grinder	Unload East	LL
P002EU	Truck 2	PUMP	Discflo Pump	Unload East	LL
P001WU	Truck 1	PUMP	Grinder	Unload West	LL
P002WU	Truck 1	PUMP	Discflo Pump	Unload West	LL
A001VT1	TT1	AG	TK1 Agitator	Tank 1	GV
A001VT2	TT2	AG	TK2 Agitator	Tank 2	GV
F003VT1	TT1	RELIEF	Emergency Vent	Tank 1	GV
F012VT2	TT2	RELIEF	Emergency Vent	Tank 2	GV
F005VOC	VOC1	CLVS-H	Flame Arrester TK1	Tank 1 VOC	GV
F013VOC	VOC1	CLVS-H	Flame Arrester TK2	Tank 2 VOC	GV
V007BK1	Burner1	VALVE	1" Valve Leading to Pressure Transmitter	Burner Cabinet	LL
V005BK1	Burner1	VALVE	Fire Valve on K1 Fuel Line	Burner Cabinet	LL
V005BK2	Burner1	VALVE	Fire valve on K2 Fuel Line	Burner Cabinet	LL
V006K1	Burner2	VALVE	1" Valve North of Burner Cabinet	Kiln 1	LL
K1BVL#1	Kiln Line	VALVE	2-1/2" Ball Valve in Containment	Kiln 1	LL
K1BV1#2	Kiln Line	VALVE	2-1/2" Ball Valve - in New Line Over Road	Kiln 1	LL
V006K2	Burner2	VALVE	1" Valve North of Burner Cabinet	Kiln 2	LL
K2BV1#1	Kiln Line	VALVE	2-1/2" Ball Valve in Containment	Kiln 2	LL
K2BV1#2	Kiln Line	VALVE	2-1/2" New Line Over Road	Kiln 2	LL
V001LK1	Burner3	VALVE	1" Valve South of Burn Cabinet	Lance K1	LL
V001LK2	Burner3	VALVE	1" Valve South of Burn Cabinet	Lance K2	LL
V016K1	KP2	VALVE	1" Valve in Pump Manifold Between Pumps 1 & 2	Kiln 1	LL
V004K1	KP2	VALVE	1" Valve to Bleeder	Kiln 1	LL
V008K1	KP2	VALVE	1" Valve to Bleeder and Nitrogen Above KP1	Kiln 1	LL
V003K1	KP2	VALVE	1" Valve to Nitrogen and Bleeder Line	Kiln 1	LL
V002K1	KP2	VALVE	1" Valve to Plug	Kiln 1	LL
V015K1	KP2	VALVE	1 <sup>st</sup> 1" Valve from Tank Farm on Burn Line	Kiln 1	LL
V001K1	KP2	VALVE	1 <sup>st</sup> Valve from Pump Outlet	Kiln 1	LL
V009K1	KP2	VALVE	2-1/2" Valve from Cabinet on Burn Line	Kiln 1	LL
V010K1	KP2	VALVE	2 <sup>nd</sup> 1" Valve from Cabinet on Burn Line	Kiln 1	LL
V014K1	KP2	VALVE	2 <sup>nd</sup> 1" Valve from Tank Farm on Burn Line	Kiln 1	LL
V005K1	KP2	VALVE	Manual Valve Above Pump	Kiln 1	LL
V007K1	KP2	VALVE	Nitrogen Valve	Kiln 1	LL

TAG NUMBER	DRAWING NUMBER	CLASS	LOCATION / EQUIPMENT TYPE	AREA	PHYSICAL STATE
V009K2	KP2	VALVE	1" Pressure Washer Inlet Valve on Pump 3	Kiln 2	LL
V018K2	KP2	VALVE	1" Valve in Pump Manifold Between Pumps 2 & 3	Kiln 2	LL
V004K2	KP2	VALVE	1" Valve to Bleeder	Kiln 2	LL
V008K2	KP2	VALVE	1" Valve to Gauge and Tap	Kiln 2	LL
V003K2	KP2	VALVE	1" Valve to Nitrogen and Gauge Line	Kiln 2	LL
V002K2	KP2	VALVE	1" Valve to Pressure Washer Hook Up System	Kiln 2	LL
V017K2	KP2	VALVE	1 <sup>st</sup> 1" Valve from Tank Farm on Burn Line	Kiln 2	LL
V001K2	KP2	VALVE	1 <sup>st</sup> Valve from Pump Outlet	Kiln 2	LL
V011K2	KP2	VALVE	2-1/2" Valve from Cabinet on Burn Line	Kiln 2	LL
V012K2	KP2	VALVE	2 <sup>nd</sup> 1" Valve from Cabinet on Burn Line	Kiln 2	LL
V006TK1	TF1	VALVE	East Unload Fire Valve	Tank 1	LL
V007TK1	TF1	VALVE	East Unload Manual Valve	Tank 1	LL
V014TK1	TF1	VALVE	Kiln Return Fire Valve	Tank 1	LL
V015TK1	TF1	VALVE	Kiln Return Manual valve	Tank 1	LL
V004TK2	TF2	VALVE	East Unload Fire Valve	Tank 2	LL
V005TK2	TF2	VALVE	East Unload Manual Valve	Tank 2	LL
V014TK2	TF2	VALVE	Kiln Return Automated Valve	Tank 2	LL
V016TK2	TF2	VALVE	Kiln Return Fire Valve	Tank 2	LL
F002VT1	TT1	FLANGE	Flange to Emergency Vent	Tank 1	GV
F018VT1	TT1	FLANGE	Flange to Level Indicator	Tank 1	GV
F001VT1	TT1	FLANGE	Flange to TK1 Agitator	Tank 1	GV
F017VT1	TT1	FLANGE	Inlet Flange to Gauge	Tank 1	GV
F011VT1	TT1	FLANGE	Inlet to High Level Probe	Tank 1	GV
F004VT1	TT1	FLANGE	Inlet to Vacuum Relief	Tank 1	GV
F016VT1	TT1	FLANGE	Inlet / Threaded Nipple	Tank 1	GV
F012VT1	TT1	FLANGE	Main Manway	Tank 1	GV
F019VT1	TT1	FLANGE	Outlet Flange to Gauge	Tank 1	GV
F013VT1	TT1	FLANGE	Outlet Flange to VOC Line	Tank 1	GV
F015VT1	TT1	FLANGE	Top Flange to Vacuum Relief	Tank 1	GV
F014VT1	TT1	FLANGE	Vacuum Relief	Tank 1	GV
F009VT2	TT2	FLANGE	Flange to Level Indicator	Tank 2	GV
F011VT2	TT2	FLANGE	Flange to Emergency Vent	Tank 2	GV
F001VT2	TT2	FLANGE	Flange to TK2 Agitator	Tank 2	GV
F018VT2	TT2	FLANGE	Inlet Flange to Gauge	Tank 2	GV
F008VT2	TT2	FLANGE	Inlet to High Level Probe	Tank 2	GV
F014VT2	TT2	FLANGE	Inlet to Vacuum Relief	Tank 2	GV
F017VT2	TT2	FLANGE	Inlet / Threaded Nipple	Tank 2	GV
F010VT2	TT2	FLANGE	Main Manway	Tank 2	GV



TAG NUMBER	DRAWING NUMBER	CLASS	LOCATION / EQUIPMENT TYPE	AREA	PHYSICAL STATE
F019VT2	TT2	FLANGE	Outlet Flange to Gauge	Tank 2	GV
F013VT2	TT2	FLANGE	Outlet Flange to VOC Line	Tank 2	GV
F016VT2	TT2	FLANGE	Top Flange Vacuum Relief	Tank 2	GV
F015VT2	TT2	FLANGE	Vacuum Relief	Tank 2	GV
F044EU	Truck 2	FLANGE	Outlet of 1 <sup>st</sup> 4" Valve from Pump	Unload East	LL
F045EU	Truck 2	FLANGE	Inlet of 1 <sup>st</sup> 4" Valve from Pump	Unload East	LL
F014EU	Truck 2	FLANGE	Top Outlet of Tee to Pressure Gauge	Unload East	LL
F015EU	Truck 2	FLANGE	Inlet to Valve to Pressure Gauge	Unload East	LL
F016EU	Truck 2	FLANGE	Outlet of Valve to Pressure Gauge	Unload East	LL
F017EU	Truck 2	FLANGE	Inlet to Pressure Gauge	Unload East	LL
F018EU	Truck 2	FLANGE	West Outlet of Tee to Bleeder Line	Unload East	LL
F019EU	Truck 2	FLANGE	Inlet to 1 <sup>st</sup> Valve to Bleeder Line	Unload East	LL
F020EU	Truck 2	FLANGE	Outlet to 1 <sup>st</sup> Valve to Bleeder Line	Unload East	LL
F013WU	Truck 1	FLANGE	Outlet of 1 <sup>st</sup> 4" Valve from Pump	Unload West	LL
F014WU	Truck 1	FLANGE	Inlet of 1 <sup>st</sup> 4" Valve from Pump	Unload West	LL
F015WU	Truck 1	FLANGE	Bottom Inlet of Tee to Pressure Gauge	Unload West	LL
F050WU	Truck 1	FLANGE	Top Outlet of Tee From 4" Pump Outlet Pressure Gauge	Unload West	LL
F016WU	Truck 1	FLANGE	Top Outlet of Tee to Pressure Gauge	Unload West	LL
F017WU	Truck 1	FLANGE	Inlet to Valve to Pressure Gauge	Unload West	LL
F018WU	Truck 1	FLANGE	Outlet of Valve to Pressure Gauge	Unload West	LL
F019WU	Truck 1	FLANGE	Inlet to Pressure Gauge	Unload West	LL
F020WU	Truck 1	FLANGE	West Outlet of Tee to Bleeder Line	Unload West	LL

NOTE: LL = Light  
Liquid Service  
GV = Gas / Vapor

All Subpart BB subject equipment is assumed to contain  $\geq 10\%$  total organic concentration.

Changes to this table are maintained in the facility's operating record and permit application modifications will not be made to update this table in the application.

## **ATTACHMENT L-2 AIR EMISSIONS CONTROL CERTIFICATION**

### AIR EMISSIONS CONTROL CERTIFICATION

This is to certify that Central Plains Cement Company in Tulsa, Oklahoma is subject to the Clean Air Act regulations codified under 40 CFR 61, Subpart V, National Emission Standard for Equipment Leaks (Fugitive Emission Sources).

CPCC operates two rotary kilns used in the production of Portland cement that burns Fuel Quality Waste (FQW) for energy recovery. FQW is transferred from two storage tanks located on the co-located Systech property via pipeline to the CPCC rotary kilns. Pursuant to 40 CFR 264.1064(m), CPCC certifies that monitoring of equipment subject to the requirements 40 CFR 264 Subpart BB located on CPCC property, is performed in accordance with 40 CFR 60, 61 and/or 63 regulations by Systech on behalf of CPCC.

CPCC also certifies that the monitoring, recordkeeping and reporting is performed in accordance with 40 CFR 60, 61 and/or 63 and meets the following requirements of 40 CFR 61 Subpart V:

- Monitoring requirements of 40 CFR 61.242-1 through 61.242-11, as applicable;
- Recordkeeping requirements of 40 CFR 61.246; and
- Reporting requirements of 40 CFR 61.247.

In addition, this is to certify the requirements of 40 CFR 264, Subpart AA and 40 CFR 264 Subpart CC do not apply to this facility.



Signature

2/3/2021

Date

Christopher Thrower

Print Name

VP of Operations

Title