B3518
MANILA

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: On-site Inspection

B351869223

FACILITY: UNITED STATES GYPSUM CO		**SRN / ID:** B3518
LOCATION: 10090 W JEFFERSON AVE, RIVER ROUGE		**DISTRICT:** Detroit
CITY: RIVER ROUGE		**COUNTY:** WAYNE
CONTACT: Brent Wyatt , Environmental Coordinator		**ACTIVITY DATE:** 09/27/2023
STAFF: Jonathan Lamb	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Scheduled inspection, FY 2023		
RESOLVED COMPLAINTS:		

INSPECTED BY: Jonathan Lamb, EGLE-AQD
PERSONNEL PRESENT: Brent Wyatt, Financial Administrator/Environmental Coordinator; Johnny Robinson, Quality Supervisor/Environmental Coordinator; Sarah Messa, Plant Manager.
FACILITY PHONE NUMBER: 313-842-4455
FACILITY WEBSITE: www.usg.com

FACILITY BACKGROUND:

United States Gypsum (USG) is a Chicago-based company with facilities nationwide specializing in the production and distribution of gypsum-based products and ceiling suspension systems which are used in the construction and remodeling industries. The River Rouge facility produces cement board, land plaster, stucco, and granular materials. This facility is located in a mostly industrial area and comprises approximately 21 acres along West Jefferson Ave. and the Rouge River, just south of the Great Lakes Water Authority – Detroit Wastewater Treatment Plant and U.S. Steel's operations on Zug Island.
The facility is considered a major source of particulate and is subject to the permitting requirements of the Title V program. The facility operates 24 hours per day, seven days per week. There are approximately 94 employees at this facility.

COMPLAINT/COMPLIANCE HISTORY:

There have been no complaint or compliance issues in the past several years.

OUTSTANDING CONSENT ORDERS:

The facility operates under a Consent Order through State Implementation Plan (SIP) No. 33-1993, revised and reissued on October 12, 1994, which includes conditions for the control of fugitive dust. The conditions of SIP No. 33-1993 are included in the Source-Wide Conditions in ROP No. MI-ROP-B3518-2021.

PROCESS DESCRIPTION AND EQUIPMENT:

There are two operations at the facility - the Mill Plant (Section 1) and the Cement Board ("Durock") Plant (Section 2).

Mill Plant

The Mill Plant currently operates five days per week, eight hours per day, to produce stucco, land plaster, and granular. Aggregate (gypsum rock) from USG's gypsum mine in Alabaster, MI, is currently delivered via truck; the facility receives 10-20 truckloads per week. The aggregate is unloaded from the trucks and stored outside in piles until it is moved inside using front-end loader, where it is stored in covered "silos" (which are basically segregated bins within a three-sided enclosure) prior to crushing. Within the silos, the aggregate is moved by crane loaders to the rock crusher, where it is crushed down to 2 inches or smaller, then sent to the rock storage bin. The rock crusher can crush up to 100 tons per hour. The crushed aggregate in the storage bin is conveyed to a natural gas-fired rotary rock dryer to dry off free moisture from the aggregate.

After drying, the crushed aggregate is elevated via a screw conveyor to a cyclonic air separator and screening system; courser materials (greater than 15 mesh) go to the granular system while finer materials (smaller than 15 mesh) go to the land plaster system. The granular system consists of a crusher and granular feed bin,

which feeds the material to a bagger after further screening – granular material is approximately the size of sand. The bagged material is then put on pallets, weighed, and labeled and sent to the warehouse for shipping for use in agricultural feedstock, soil conditioner, glass making, and pharmaceutical production. For the land plaster system, material must be 100 mesh or smaller to be land plaster grade (approximately the consistency of talcum powder). Screened material from the dryer which is already smaller than 100 mesh is sent directly to the land plaster bins, but material sized 15 to 100 mesh is sent to one of two 50-ton Raymond Mill feed bins and then fed into the Raymond Mill, which uses rollers to further crush the material to 100 mesh or less before sending to the land plaster bins. There are three land plaster bins, each with a capacity of 30 tons. Land plaster is considered both a final product, which can be loaded into pneumatic trucks or into 12,000-pound bags and sold for use in other industries (primarily agriculture and cement industries), or a material used on site in other production. Land plaster used at this facility is sent from the land plaster bins to either the calcining kettles to produce stucco in the Mill Plant or sent to the HRA bin prior to use in the Cement Board Plant.

There are two natural gas-fired calcining kettles (Nos. 1 and 3 Calcining Kettles); only one kettle is used at a time. The kettles use indirect heat to heat the land plaster to 250°F for approximately 90 minutes to remove 75% of the water molecules to produce stucco; this process is known as calcining. As the land plaster turns to stucco, it becomes lighter and overflows in the kettles and goes to the warehouse bins. There are two warehouse bins - No. 1 Warehouse Bin has a capacity of 180 tons and No. 2 Warehouse Bin has a capacity of 300 tons. Stucco in the warehouse bins can be loaded directly into bulk tankers and is sold as a material for use in other industries, including the production of fire suppressants and drywall.

Cement Board Plant

The Cement Board Plant operates seven days per week, 24 hours per day to produce a moisture-resistant and mold-resistant cement board sold under the "Durock" brand.

Raw dry materials used in the cement board process include Portland cement, fly ash, perlite, and hadite (a lightweight expanded shale), in addition to land plaster from the Mill Plant and reclaimed cement board. Portland cement and fly ash are delivered via tanker or truck. Upon delivery, the Portland cement, and fly ash are off- loaded into silos for storage and then conveyed to bulk storage bins inside the cement board plant. The facility installed a perlite expansion system which started operation in June 2023; perlite ore is delivered via rail from New Mexico to be used in the perlite expansion system. There are designated silos and bulk bins for the Portland cement, fly ash, and perlite. Hadite is delivered either via 40-yard truck or off-loaded from freighter. Hadite received from trucks is dumped directly from the truck into an enclosed building. Hadite received from freighter is off-loaded on the property of Detroit Bulk Dock, located adjacent to USG's property. The material is brought onto USG property using front-end loaders, which takes the hadite from the storage pile to the building where the trucks dump the hadite. The hadite aggregate pile on Detroit Bulk Dock's property is tarped when material is not being added or removed from the pile. From the enclosed hadite bulk storage area, the hadite is loaded into a hopper using a front-end loader and then elevated to an aggregate storage bin inside the cement board plant.

To produce cement board, the dry materials are weight-fed from the indoor bulk storage bins into the back end of the mixer; Portland cement, fly ash, perlite, and land plaster are conveyed from the indoor bulk storage binds to a process bin and then metered into the mixer, while material from the aggregate bin (hadite and reclaim material) are metered directly to the mixer. Wet additives (including water, MCM, trisodium phosphate, polyvinyl alcohol, and citric acid) are also added to the front end of the mixer along with the dry materials, creating a cement slurry. The wet additives help control curing rates during the process.

To produce the cement board, the cement slurry is applied to a backing paper on a conveyor and another layer of paper then laid over the top of the slurry mix – this area is called the forming station. The uncured board on the conveyor then goes through a spreader/roller to flatten to the desired thickness (1/4" to 5/8") and width (32" to 48") before passing through a natural gas-fired oven set around 150°F to start the curing process. After passing through the oven, the cement is set enough to be cut to length (usually 4'-8') and then loaded off the

conveyor and stacked using an automated system. The conveyor line moves at a speed of 100 to 110 feet per minute and the entire process (from adding the slurry to the backing paper to being off-loaded from the conveyor) takes only three to four minutes, though it takes an additional 24 hours or so for the cement to finish curing. Any boards which do not meet specifications are sent to the Cement Board Waste Recycler, where it is ground up, added to the aggregate bin, and reused in the cement board process.

The following is a list of emission units at the facility, including air pollution control equipment, and Subpart OOO and Subpart UUU applicability:

Mill Plant
EU-5: Land Plaster System (Land Plaster Bin, Raymond Mill Feed Bin, Air Cyclone Separator, Screen). This unit is controlled by a baghouse which is exhausted through a stack to ambient air. This unit is subject to Subpart OOO.
EU-6: Rock Dryer (including Rock Crusher and Rock Storage Bin). This unit is controlled by a baghouse which is exhausted through a stack to ambient air. This unit is subject to Subpart UUU.
EU-9: Granular System. This unit is controlled by a baghouse which operates as a closed system. There is no exhaust stack or vent; all particulate collected is screw-conveyed back into the Granular System and reused. This unit is subject to Subpart OOO.
EU-10: No. 1 and No. 2 Warehouse Bins. This unit is controlled by a baghouse which is exhausted through a stack to ambient air. This unit is subject to Subpart OOO.
EU-23: Raymond Mill. This unit is controlled by a baghouse which operates as a closed system. There is no exhaust stack or vent; all particulate collected is screw-conveyed back into the Raymond Mill and reused. This unit is subject to Subpart OOO.
EU-35: HRA Land Plaster Bin. This unit is controlled by a baghouse which operates as a closed system. There is no exhaust stack or vent; all particulate collected is screw-conveyed back into the bin and reused. This unit is subject to Subpart OOO but is exempt from the particulate emission rate testing requirements of Subpart OOO per 40 CFR 60.672(f).
EU-36: No. 1 Calcining Kettle. This unit is controlled by a baghouse which is exhausted through a stack to ambient air. This unit is subject to Subpart UUU.
EU-38: No. 3 Calcining Kettle. This unit is controlled by a baghouse which is exhausted through a stack to ambient air. This unit is subject to Subpart UUU.

Cement Board Plant
EU-33: Bulk Portland Cement. This unit is controlled by a baghouse which operates as a closed system. There is no exhaust stack or vent; all particulate collected is screw-conveyed back into the bin and reused. Portland cement is not considered to be a non-metallic mineral and therefore not subject to Subpart OOO.
EU-42: Bulk Perlite. This unit is controlled by a baghouse which operates as a closed system. There is no exhaust stack or vent; all particulate collected is screw-conveyed back into the bin and reused. Perlite is considered a non-metallic mineral; however, since there is no additional grinding of perlite, it is not subject to Subpart OOO per 40 CFR 60.670(a)(2).
EU-43: Bulk Fly Ash. This unit is controlled by a baghouse which operates as a closed system. There is no exhaust stack or vent; all particulate collected is screw-conveyed back into the bin and reused. Fly ash is not considered to be a non-metallic mineral and therefore not subject to Subpart OOO.
EU-44: Cement Board Ink Jet Printer that sprays water-based black ink on the Durock cement panels to convey logo, specs, and panel production information.
EU-55: Cement Board Process (Process Bin, Hadite/Aggregate storage, elevator/conveyor taking hadite to mixer, conveyor taking Portland cement, fly ash, perlite, and land plaster from HRA bin to mixer). This unit is controlled by a baghouse which is exhausted through a stack to ambient air. This unit was previously determined to not be subject to Subpart OOO; however, due to the use of land plaster in a small portion of the process, this unit was tested for particulate emission rates and opacity in case it is later determined to be subject to the requirements of Subpart OOO.

EU-70: Portland Cement Silo. This unit is controlled by a baghouse which is exhausted through a stack to ambient air. Portland cement is not considered to be a non-metallic mineral and therefore not subject to Subpart OOO.
EU-71: Perlite Silo. This unit is controlled by a baghouse which is exhausted through a stack to ambient air. Perlite is considered a non-metallic mineral; however, since there is no additional grinding of perlite, it is not subject to Subpart OOO per 40 CFR 60.670(a)(2).
EU-72: Fly Ash Silo. This unit is controlled by a baghouse which is exhausted through a stack to ambient air. Fly ash is not considered to be a non-metallic mineral and therefore not subject to Subpart OOO.
EU-73 - Cement Board Waste Recycling. This emission unit is controlled by a baghouse which operates as a closed system. There is no exhaust stack or vent. All particulate collected is screw-conveyed back into the bin and reused. This emission unit is exempt per Rule 285(2)(l)(vi)(B).
EU-74: Perlite Ore Bin. This unit is controlled by a bin vent/separator. Perlite is considered a non-metallic mineral; however, since there is no additional grinding of perlite, it is not subject to Subpart OOO per 40 CFR 60.670(a)(2).
EU-75: Perlite Expansion Natural Gas-Fired Furnace. This unit is controlled by a cyclone and baghouse. Perlite is considered a non-metallic mineral; however, since there is no additional grinding of perlite, it is not subject to Subpart OOO per 40 CFR 60.670(a)(2).
EU-76: Perlite Coater. This unit conveys to EU-71 and is controlled by a vacuum receiver. Perlite is considered a non-metallic mineral; however, since there is no additional grinding of perlite, it is not subject to Subpart OOO per 40 CFR 60.670(a)(2).

APPLICABLE RULES/ PERMIT CONDITIONS:
US Gypsum is a major source of particulate and subject to Title V permitting requirements. US Gypsum was issued Renewable Operating Permit (ROP) No. MI-ROP-B3518-2021 on July 12, 2021. The ROP is separated into two sections: Mill Plant (Section 1) and Cement Board Plant (Section 2). Note: This ROP renewal removed the idled Board Plant (formerly permitted as Section 3) as well as some individual idled emission units in the Mill Plant and Cement Board Plant.

US Gypsum was issued Permit to Install (PTI) No. 75-21 on October 5, 2021, for a perlite expansion system.

Notes: Records from January 2022 through August 2023 were reviewed during this inspection. These records can be found in the orange facility file.

ROP No. MI-ROP-B3518-2021, Special Conditions:

SECTION 1 – MILL PLANT

Source-Wide Conditions
I. Emission Limits
1. IN COMPLIANCE. Facility has demonstrated compliance with the emission limit of 0.03 grains per dry standard cubic foot for each dust collector either by testing or through monitoring and recordkeeping requirements.
2. IN COMPLIANCE. Facility has demonstrated compliance with the 20% opacity limit for fugitive dust sources (not including roads, lots, or storage piles) either by testing or weekly visible emission observations.
3. IN COMPLIANCE. Facility has demonstrated compliance with the 5% opacity limit for roads, lots, and storage piles through weekly visible emission observations.

III. Process/Operational Restrictions
1. IN COMPLIANCE. Facility implements and maintains a fugitive dust plan. A copy of the Fugitive Dust Plan, dated September 24, 2020, was submitted to AQD.

V. Testing/Sampling
1. IN COMPLIANCE. All required testing of emission units has been performed. Information of this testing can be found in the evaluations of the emission units and flexible groups contained in this report.

VI. Monitoring/Recordkeeping
1 and 2. IN COMPLIANCE. Facility performs visible emissions readings on storage piles, lots, roadways, and dust collectors on a weekly basis, as required. Records of these readings are maintained.

VII. Reporting
1. IN COMPLIANCE. Deviations are reported pursuant to GC 21 and 22 of Part A.
2. IN COMPLIANCE. Semiannual reports of monitoring and deviations are submitted by March 15 (for reporting period July 1 through December 31) and September 15 (for reporting period January 1 through June 30) each year, as required per GC 23 of Part A.
3. IN COMPLIANCE. Annual compliance certification is submitted by March 15 for the previous calendar year, as required per GC 19 and 20 of Part A.
4. IN COMPLIANCE. Facility submits quarterly reports to AQD, as specified in the Fugitive Dust Control Plan in Appendix 3-1, to demonstrate compliance with Consent Order SIP Number 33-1993, Paragraph 11.

IX. Other Requirements
1 and 2. IN COMPLIANCE. In following its Fugitive Dust Plan, AQD has determined that the facility sufficiently complies with the provisions and requirements of the fugitive dust control operating program and Recordkeeping for Fugitive Dust Sources Addendum, which are attached as Appendices 3-1 and 4-1 (Consent Order SIP Number 33-1993, Exhibit A).
3. NOT DETERMINED. Unsure at this time if EPA has been notified of the revised fugitive dust provisions.

EU-35 – HRA Land Plaster Bin

I. Emission Limits:
1. IN COMPLIANCE. Compliance with the particulate emission rate of 0.019 lbs. per 1,000 lbs. exhaust gas on an ongoing basis is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-MILL, VI.1 through 8. The HRA Land Plaster Bin operates as a closed system with no external exhaust for the baghouse, and as an enclosed storage bin is exempt from the applicable stack particulate matter concentration limit and associated initial performance testing of Subpart OOO, per 40 CFR 60.672(f).
2. IN COMPLIANCE. Compliance with the particulate emission rate of 0.04 pounds per hour on an ongoing basis is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-MILL, VI.1 through 8. The HRA Land Plaster Bin operates as a closed system with no external exhaust for the baghouse, and as an enclosed storage bin is exempt from the applicable stack particulate matter concentration limit and associated initial performance testing of Subpart OOO, per 40 CFR 60.672(f).
3. IN COMPLIANCE. Facility reported particulate emissions of 20.0 pounds in 2022 and 13.6 pounds in 2023 (through August), well below the permit limit of 0.19 tons annually. The facility uses an EPA emission factor to calculate emissions to demonstrate compliance with this condition; however, the HRA Land Plaster Bin operates as a closed system with no external exhaust for the baghouse.
4. IN COMPLIANCE. Compliance with the 7% 6-minute average opacity limit for fugitive emissions from the building enclosing the emission unit, specified in 40 CFR 60.672(e)(1), has not been verified through initial performance testing, as required per 40 CFR 60.675(d)(2). Compliance with the opacity limit of 7%, 6-minute average on an ongoing basis is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-MILL, VI.1 through 8, and 40 CFR Part 60, Subpart OOO - Table 2.

V. Testing/Sampling
1. IN COMPLIANCE. Testing for visible emissions, in accordance with Subpart OOO, was performed on January 4, 2018. This unit is exempt from the initial performance testing requirements for particulate emission rates in Subpart OOO per 60.672(f). Initial performance testing for visible emissions per Subpart OOO has not been performed. The HRA Land Plaster Bin operates as a closed system with no external exhaust for the baghouse so initial performance testing for the particulate emission rate is not required, but initial performance testing for fugitive emissions from the building enclosing the emission unit using Method 9 is required to demonstrate compliance with Subpart OOO per 40 CFR 60.675(d)(2). Testing for particulate matter has not been requested by AQD.

VI. Monitoring/Recordkeeping
1. IN COMPLIANCE. Records are maintained in an acceptable format and made available to AQD, as required.
2. IN COMPLIANCE. Hours of operation of EU-35 are recorded on a monthly and annual basis. EU-35 operated 1636 hours in 2022 and 1420 hours in 2023 (through August).
3. IN COMPLIANCE. Particulate emissions from EU-35 are calculated and recorded on a monthly and annual basis using EPA emission factors to demonstrate compliance with EU-35, I.3; however, the HRA Land Plaster Bin operates as a closed system with no external exhaust for the baghouse.

VII. Reporting
1. IN COMPLIANCE. Deviations are reported pursuant to GC 21 and 22 of Part A.
2. IN COMPLIANCE. Semiannual reports of monitoring and deviations are submitted by March 15 (for reporting period July 1 through December 31) and September 15 (for reporting period January 1 through June 30) each year, as required per GC 23 of Part A.
3. IN COMPLIANCE. Annual compliance certification is submitted by March 15 for the previous calendar year, as required per GC 19 and 20 of Part A.
4. IN COMPLIANCE. Performance test reports are submitted to AQD Technical Programs Unit and District Office.

VIII. Stack/Vent Restrictions
1. IN COMPLIANCE. The HRA Land Plaster Bin operates as a closed system with no external exhaust for the baghouse.

IX. Other Requirements
1. IN COMPLIANCE. Facility complies with the provisions of the National Standards of Performance for Nonmetallic Mineral Processing Plants, as specified in 40 CFR Part 60, Subparts A and OOO – National Standards of Performance for Nonmetallic Mineral Processing Plants, as they apply to EU-35.

FG-KETTLES – Nos. 1 and 3 Calcining Kettles: Associated Emission Unit IDs: EU-36 and EU-38.

I. Emission Limits:
1. IN COMPLIANCE. Testing performed on December 21, 2021, for No. 1 Calcining Kettle (EU-36) showed a particulate emission rate of 0.0026 grams per dry standard cubic meter, demonstrating compliance with the permit limit of 0.05 grams per dry standard cubic meter for each calcining kettle. Note: As agreed in the ROP, AQD allowed the company to test one calcining kettle as representative of the emission rates for both No. 1 Calcining Kettle and No. 3 Calcining Kettle.
2. IN COMPLIANCE. Testing performed on December 21, 2021, for No. 1 Calcining Kettle (EU-36) showed a particulate emission rate of 0.077 lbs. per hour, demonstrating compliance with the permit limit of 6.8 lbs. per hour for each calcining kettle. Note: As agreed in the ROP, AQD allowed the company to test one calcining kettle as representative of the emission rates for both No. 1 Calcining Kettle and No. 3 Calcining Kettle.
3. IN COMPLIANCE. Facility reported particulate emissions of 205 pounds in 2022 and 153 pounds in 2023 (through August) for FG-KETTLES, well below the permit limit of 29.8 tons annually for FG-KETTLES. Emission calculations are based on the results of testing performed December 21, 2021, and throughput.
4. IN COMPLIANCE. Testing performed on December 21, 2021, for No. 1 Calcining Kettle showed 0% opacity over a 6-minute average, demonstrating compliance with the permit limit of 7% opacity based on a 6-minute average. Note: As agreed in the ROP, AQD allowed the company to test one calcining kettle as representative of the emission rates for both No. 1 Calcining Kettle and No. 3 Calcining Kettle.

V. Testing/Sampling
1 and 2. IN COMPLIANCE. Testing for particulate emission rates and visible emissions, in accordance with Subpart UUU, was performed on December 21, 2021, for No. 1 Calcining Kettle (EU-36). Note: As agreed in the ROP, AQD allowed the company to test one calcining kettle as representative of the emission rates for

both No. 1 Calcining Kettle and No. 3 Calcining Kettle. Results were reported to AQD on February 7, 2022. Testing was performed within 180 days of issuance of ROP No. MI-ROP-B3518-2021.
3. IN COMPLIANCE. Performance test reports were submitted to AQD Technical Programs Unit and District Office.

VI. Monitoring/Recordkeeping
1. IN COMPLIANCE. Records are maintained in an acceptable format and made available to AQD, as required.
2. IN COMPLIANCE. Hours of operation of FG-KETTLES are recorded on a monthly and annual basis. FG-Kettles operated 1355 hours in 2022 and 993 hours in 2023 (through August).
3. IN COMPLIANCE. Particulate emissions from FG-KETTLES are calculated and recorded on a monthly and annual basis using monthly throughput and emission rates determined through testing performed on December 21, 2021.

VII. Reporting
1. IN COMPLIANCE. Deviations are reported pursuant to GC 21 and 22 of Part A.
2. IN COMPLIANCE. Semiannual reports of monitoring and deviations are submitted by March 15 (for reporting period July 1 through December 31) and September 15 (for reporting period January 1 through June 30) each year, as required per GC 23 of Part A.
3. IN COMPLIANCE. Annual compliance certification is submitted by March 15 for the previous calendar year, as required per GC 19 and 20 of Part A.
4. IN COMPLIANCE. Performance test reports are submitted to AQD Technical Programs Unit and District Office.

VIII. Stack/Vent Restrictions
1. IN COMPLIANCE. According to facility documentation, stacks SV-36 and SV-38 meet permit specifications.

IX. Other Requirements
1. IN COMPLIANCE. Facility complies with the provisions of the National Standards of Performance for Nonmetallic Mineral Processing Plants, as specified in 40 CFR Part 60, Subparts A and UUU – National Standards of Performance for Nonmetallic Mineral Processing Plants, as they apply to FG-KETTLES.

FG-MILL1: Associated Emission Unit IDs: EU-6, EU-35, EU-36, and EU-38.

I. Emission Limits
1. IN COMPLIANCE. Applies to EU-6 only. Testing performed on December 18-19, 2012, showed a particulate emission rate of 0.0008 lbs. per 1,000 lbs. exhaust gas, demonstrating compliance with the permit limit of 0.042 lbs. per 1,000 lbs. of exhaust gas.
2. IN COMPLIANCE. Applies to EU-6 only. Testing performed on December 18-19, 2012, showed a particulate emission rate of 0.06 lbs. per hour, demonstrating compliance with the permit limit of 4.5 lbs. per hour.
3. IN COMPLIANCE. Applies to EU-6 only. Facility reported particulate emissions of 50 pounds in 2022 and 35.7 pounds 2023 (through August), well below the permit limit of 19.8 tons per 12-month rolling time period.
4. IN COMPLIANCE. Applies to EU-6 only. Testing performed on December 18-19, 2012, showed 0% opacity over a 6-minute average, demonstrating compliance with the permit limit of 10% opacity based on a 6 -minute average.

III. Process/Operational Restrictions
1. IN COMPLIANCE. Facility only uses natural gas to fuel EU-6.
2. IN COMPLIANCE. Facility does not process any asbestos tailings or asbestos-containing waste materials in EU-6.

III. Process/Operational Restrictions
1. IN COMPLIANCE. Facility only uses natural gas to fuel EU-6.
2. IN COMPLIANCE. Facility does not process any asbestos tailings or asbestos-containing waste materials in EU-6.
3. IN COMPLIANCE. Facility implements and maintains a Preventative Maintenance/Malfunction Abatement Plan (PM/MAP) for FG-MILL1, as required. A copy of the PM/MAP, dated 9/24/2020, was provided to AQD and can be found in the facility file.

IV. Design/Equipment Parameters
1a. through d.: IN COMPLIANCE. Baghouse dust collectors are installed and operated as required.

V. Testing/Sampling
1. IN COMPLIANCE. Applies to EU-6 only. Testing for particulate emission rates and visible emissions, in accordance with Subpart UUU, was performed on December 18-19, 2012. Results were reported to AQD on February 15, 2013.

VI. Monitoring/Recordkeeping
1. IN COMPLIANCE. Records are maintained in an acceptable format and made available to AQD, as required.
2. IN COMPLIANCE. Applies to EU-6 only. Hours of operation of EU-6 are recorded on a monthly and annual basis. EU-6 operated 2435 hours in 2022 and 1610 hours in 2023 (through August).
3a. through e. IN COMPLIANCE. The facility performs the monitoring and recordkeeping, as required by this condition. Differential pressure for each baghouse and visible emission observations are performed weekly. Hours of operation for the rock drying is recorded monthly. Natural gas usage is recorded on a monthly and 12-month rolling basis.
4a. through e. IN COMPLIANCE. Inspections of baghouse collectors is performed on a daily and weekly basis. All preventative maintenance, repairs, and corrective actions are recorded, as required.

VII. Reporting
1. IN COMPLIANCE. Deviations are reported pursuant to GC 21 and 22 of Part A.
2. IN COMPLIANCE. Semiannual reports of monitoring and deviations are submitted by March 15 (for reporting period July 1 through December 31) and September 15 (for reporting period January 1 through June 30) each year, as required per GC 23 of Part A.
3. IN COMPLIANCE. Annual compliance certification is submitted by March 15 for the previous calendar year, as required per GC 19 and 20 of Part A.
4. IN COMPLIANCE. Performance test reports are submitted to AQD Technical Programs Unit and District Office.

VIII. Stack/Vent Restrictions
1. IN COMPLIANCE. According to facility documentation, stack SV-6 meets permit specifications.

IX. Other Requirements
1. IN COMPLIANCE. Facility complies with the provisions of the National Standards of Performance for Nonmetallic Mineral Processing Plants, as specified in 40 CFR Part 60, Subparts A and UUU – National Standards of Performance for Nonmetallic Mineral Processing Plants, as they apply to EU-6.

FG-MILL2: Associated Emission Unit IDs: EU-5, EU-9, EU-10, and EU-23.

I. Emission Limits
1. IN COMPLIANCE. Applies to EU-5, EU-10, and EU-23 only. The following emission units demonstrated compliance with this limit:
- EU-5: Testing performed on December 18-19, 2012, showed a particulate emission rate of 0.0005 lbs. per 1,000 lbs. exhaust gas, demonstrating compliance with the permit limit of 0.029 lbs. per 1,000 lbs. of exhaust gas.

- EU-10: Testing performed on October 1, 2013, showed a particulate emission rate of 0.001 lbs. per 1,000 lbs. of exhaust gas, demonstrating compliance with the permit limit of 0.029 lbs. per 1,000 lbs. of exhaust gas.
- EU-23: Compliance with the particulate emission rate of 0.029 lbs. per 1,000 lbs. exhaust gas on an ongoing basis is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-MILL, VI.1 through 4, and 40 CFR Part 60, Subpart OOO - Table 2. The Raymond Mill operates as a closed system with no external exhaust for the baghouse and there are no mechanically-induced air flow vents for the building, so initial performance testing for particulate emission rates from the exhaust stacks to demonstrate compliance with Subpart OOO does not appear to be required, per 40 CFR 60.672(e).

2. IN COMPLIANCE. Applies to EU-9 only. Compliance with the particulate emission rate of 0.05 grams per dry standard cubic meter on an ongoing basis is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-MILL, VI.1 through 4, and 40 CFR Part 60, Subpart OOO - Table 2. The granular process operates as a closed system with no external exhaust for the baghouse and there are no mechanically-induced air flow vents for the building, so initial performance testing for particulate emission rates from the exhaust stacks to demonstrate compliance with Subpart OOO does not appear to be required, per 40 CFR 60.672(e).

3. IN COMPLIANCE. Applies to EU-5 only. 2. IN COMPLIANCE. Testing performed on December 18-19, 2012, showed a particulate emission rate of 0.03 lbs. per hour, demonstrating compliance with the permit limit of 1.60 lbs. per hour.

4. IN COMPLIANCE. Applies to EU-10 only. Testing performed on October 1, 2013, showed a particulate emission rate of 0.02 lbs. per hour, demonstrating compliance with the permit limit of 0.9 lbs. per hour.

5. IN COMPLIANCE. Applies to EU-23 only. Compliance with the particulate emission rate of 0.9 pounds per hour on an ongoing basis is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-MIL2L, VI.1 through 4, and 40 CFR Part 60, Subpart OOO - Table 2. The Raymond Mill operates as a closed system with no external exhaust for the baghouse and there are no mechanically-induced air flow vents for the building, so initial performance testing for particulate emission rates from the exhaust stacks to demonstrate compliance with Subpart OOO does not appear to be required, per 40 CFR 60.672(e).

6. IN COMPLIANCE. Applies to EU-5 only. Facility reported particulate emissions of 16.1 pounds in 2022 and 12.0 pounds in 2023 (through August), well below the permit limit of 6.95 tons annually.

7. IN COMPLIANCE. Applies to EU-10 only. Facility reported particulate emissions of 27 pounds in 2022 and 20 pounds in 2023 (through August), well below the permit limit of 4.0 tons annually.

8. IN COMPLIANCE. Facility reported particulate emissions of 42 pounds in 2022 and 31 pounds in 2023 (through August), well below the permit limit of 4.0 tons annually. The facility uses an EPA emission factor to calculate emissions to demonstrate compliance with this condition; however, the Raymond Mill System operates as a closed system with no external exhaust for the baghouse.

9. IN COMPLIANCE. Applies to EU-5, EU-10, and EU-23 only. The following emission units demonstrated compliance with this limit:
- EU-5: Testing performed on December 18-19, 2012, showed 0% opacity over a 6-minute average, demonstrating compliance with the permit limit of 7% opacity based on a 6-minute average.
- EU-10: Testing performed on October 1, 2013, showed 0% opacity over a 6-minute average, demonstrating compliance with the permit limit of 7% opacity based on a 6-minute average.
- EU-23: Compliance with the 7% 6-minute average opacity limit for fugitive emissions from the building enclosing the emission unit, specified in 40 CFR 60.672(e)(1), has not been verified through initial performance testing, as required per 40 CFR 60.675(d)(2). Compliance with the opacity limit of 7%, 6-minute average on an ongoing basis is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-MILL, VI.1 through 4, and 40 CFR Part 60, Subpart OOO - Table 2.

10. IN COMPLIANCE. Applies to EU-9 only. Testing for visible emissions, in accordance with 40 CFR 60.675(d)(2), was performed on January 4, 2018, and demonstrated compliance with the 7%, 6-minute average opacity limit for fugitive emissions from the building enclosing the emission unit, as specified in 40 CFR 60.672(e)(1). Compliance with the opacity limit of 7%, 6-minute average on an ongoing basis is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-MILL, VI.1 through 4, and 40 CFR Part 60, Subpart OOO - Table 2.

III. Process/Operational Restrictions

1. IN COMPLIANCE. Disposal of any material collected by the dust collectors is reused in the process or disposed of in a manner which minimized the introduction of air contaminants to the ambient air.
2. IN COMPLIANCE. Facility implements and maintains a Preventative Maintenance/Malfunction Abatement Plan (PM/MAP) for FG-MILL2, as required. A copy of the PM/MAP, dated 9/24/2020, was provided to AQD and can be found in the facility file.

IV. Design/Equipment Parameters
1a. through m. IN COMPLIANCE. Baghouse dust collectors are installed and operated as required.

V. Testing/Sampling
1. IN COMPLIANCE. The following emission units demonstrated compliance with this testing requirement:
- EU-5: Testing for particulate emission rates and visible emissions, in accordance with Subpart OOO, was performed on December 18-19, 2012. Results were reported to AQD on February 15, 2013.
- EU-9: Testing for visible emissions, in accordance with Subpart OOO, was performed on January 4, 2018. The granular process operates as a closed system with no external exhaust for the baghouse so initial performance testing for the particulate emission rate is not required, but initial performance testing for fugitive emissions from the building enclosing the emission unit using Method 9 was required to demonstrate compliance with Subpart OOO per 40 CFR 60.675(d)(2).
- EU-10: Testing for particulate emission rates and visible emissions, in accordance with Subpart OOO, was performed on October 1, 2013. Results were reported to AQD on December 2, 2013.
- EU-23: Testing for visible emissions, in accordance with Subpart OOO, was performed on January 4, 2018. The Raymond Mill operates as a closed system with no external exhaust for the baghouse so initial performance testing for the particulate emission rate is not required, but initial performance testing for fugitive emissions from the building enclosing the emission unit using Method 9 is required to demonstrate compliance with Subpart OOO per 40 CFR 60.675(d)(2).

VI. Monitoring/Recordkeeping
1. IN COMPLIANCE. Records are maintained in an acceptable format and made available to AQD, as required.
2. IN COMPLIANCE. The facility calculates and records the PM emissions from each emission unit in FG-MILL2 on a monthly and annual basis in a manner acceptable to AQD.
3a. through c. IN COMPLIANCE. The facility performs the monitoring and recordkeeping, as required by this condition. Differential pressure for each baghouse and visible emission observations are performed weekly.
4a. through e. IN COMPLIANCE. Inspections of baghouse collectors is performed on a daily and weekly basis. All preventative maintenance, repairs, and corrective actions are recorded, as required.

VII. Reporting
1. IN COMPLIANCE. Deviations are reported pursuant to GC 21 and 22 of Part A.
2. IN COMPLIANCE. Semiannual reports of monitoring and deviations are submitted by March 15 (for reporting period July 1 through December 31) and September 15 (for reporting period January 1 through June 30) each year, as required per GC 23 of Part A.
3. IN COMPLIANCE. Annual compliance certification is submitted by March 15 for the previous calendar year, as required per GC 19 and 20 of Part A.
4. IN COMPLIANCE. Performance test reports are submitted to AQD Technical Programs Unit and District Office.

VIII. Stack/Vent Restrictions
1 through 4. IN COMPLIANCE. According to facility documentation, stacks SV-5, SV-9, SV-10, and SV-23 meet permit specifications.

IX. Other Requirements
1. IN COMPLIANCE. Facility complies with the provisions of the National Standards of Performance for Nonmetallic Mineral Processing Plants, as specified in 40 CFR Part 60, Subparts A and OOO – National Standards of Performance for Nonmetallic Mineral Processing Plants, as they apply to FG-MILL2.

SECTION 2 – CEMENT BOARD PLANT

Source-Wide Conditions

I. Emission Limits

1. IN COMPLIANCE. Facility has demonstrated compliance with the emission limit of 0.03 grains per dry standard cubic foot for each dust collector either by testing or through monitoring and recordkeeping requirements.
2. IN COMPLIANCE. Facility has demonstrated compliance with the 20% opacity limit for fugitive dust sources (not including roads, lots, or storage piles) either by testing or weekly visible emission observations.
3. IN COMPLIANCE. Facility has demonstrated compliance with the 5% opacity limit for roads, lots, and storage piles through weekly visible emission observations.

III. Process/Operational Restrictions

1. IN COMPLIANCE. Facility implements and maintains a fugitive dust plan. A copy of the Fugitive Dust Plan, dated September 24, 2020, was submitted to AQD.

V. Testing/Sampling

1. IN COMPLIANCE. All required testing of emission units has been performed. Information of this testing can be found in the evaluations of the emission units and flexible groups contained in this report.

VI. Monitoring/Recordkeeping

1 and 2. IN COMPLIANCE. Facility performs visible emissions readings on storage piles, lots, roadways, and dust collectors on a weekly basis, as required. Records of these readings are maintained.

VII. Reporting

1. IN COMPLIANCE. Deviations are reported pursuant to GC 21 and 22 of Part A.
2. IN COMPLIANCE. Semiannual reports of monitoring and deviations are submitted by March 15 (for reporting period July 1 through December 31) and September 15 (for reporting period January 1 through June 30) each year, as required per GC 23 of Part A.
3. IN COMPLIANCE. Annual compliance certification is submitted by March 15 for the previous calendar year, as required per GC 19 and 20 of Part A.
4. IN COMPLIANCE. Facility submits quarterly reports to AQD, as specified in the Fugitive Dust Control Plan in Appendix 3-2, to demonstrate compliance with Consent Order SIP Number 33-1993, Paragraph 11.

IX. Other Requirements

1 and 2. IN COMPLIANCE. In following its Fugitive Dust Plan, AQD has determined that the facility sufficiently complies with the provisions and requirements of the fugitive dust control operating program and Recordkeeping for Fugitive Dust Sources Addendum, which are attached as Appendices 3-2 and 4-2 (Consent Order SIP Number 33-1993, Exhibit A).
3. NOT DETERMINED. Unsure at this time if EPA has been notified of the revised fugitive dust provisions.

EU-33 – Bulk Portland Cement

I. Emission Limits

1. IN COMPLINACE. Compliance with the emission rate of 0.019 lbs. per 1,000 lbs. of exhaust gas is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-CEMENTBOARD, VI.1 through 4.
2. IN COMPLIANCE. Compliance with the emission rate of 0.08 lbs. per hour is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-CEMENTBOARD, VI.1 through 4.
3. IN COMPLIANCE. Facility reported particulate emissions of 74 pounds in 2022 and 45 pounds in 2023 (through August), below the permit limit of 0.35 tons annually.
4. IN COMPLIANCE. Compliance with the opacity limit of 7%, 6-minute average is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-CEMENTBOARD, VI.1 through 4.

V. Testing/Sampling
1. NOT EVALUATED. AQD has not requested testing for PM emission rates or visible emissions.
VI. Monitoring/Recordkeeping
1. IN COMPLIANCE. Records are maintained in an acceptable format and made available to AQD, as required.
2. IN COMPLIANCE. Hours of operation of EU-33 are recorded on a monthly and annual basis. EU-33 operated 6723 hours in 2022 and 4510 hours in 2023 (through August).
3. IN COMPLIANCE. Particulate emissions from EU-33 are calculated and recorded on a monthly and annual basis using EPA emission factors.

VII. Reporting
1. IN COMPLIANCE. Deviations are reported pursuant to GC 21 and 22 of Part A.
2. IN COMPLIANCE. Semiannual reports of monitoring and deviations are submitted by March 15 (for reporting period July 1 through December 31) and September 15 (for reporting period January 1 through June 30) each year, as required per GC 23 of Part A.
3. IN COMPLIANCE. Annual compliance certification is submitted by March 15 for the previous calendar year, as required per GC 19 and 20 of Part A.

VIII. Stack/Vent Restrictions
1. IN COMPLIANCE. Exhaust gases from EU-33 are discharged within the Cement Board Plant, not the ambient air.

FG-CEMENTBOARD. Associated Emission Unit IDs: EU-33, EU-42, EU-43, EU-55, EU-70, EU-71, and EU-72.

I. Emission Limits
1. IN COMPLIANCE. Applies to EU-42 and EU-43 only. Compliance with the emission rate of 0.019 lbs. per 1,000 lbs. of exhaust gas is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-CEMENTBOARD, VI.1 through 4.
2. IN COMPLIANCE. Applies to EU-55 only. Testing performed on October 1, 2013, showed a particulate emission rate of 0.0003 grains per dry standard cubic foot, demonstrating compliance with the permit limit of 0.015 grains per dry standard cubic foot.
3. IN COMPLIANCE. Applies to EU-70, EU-71, and EU-72 only. Compliance with the emission rate of 0.038 lbs. per 1,000 lbs. of exhaust gas is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-CEMENTBOARD, VI.1 through 4.
4. IN COMPLIANCE. Applies to EU-42 and EU-43 only. Compliance with the emission rate of 0.07 lbs. per hour is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-CEMENTBOARD, VI.1 through 4.
5. IN COMPLIANCE. Applies to EU-55 only. Testing performed on October 1, 2013, showed a particulate emission rate of 0.016 lbs. per hour, demonstrating compliance with the permit limit of 1.54 lbs. per hour.
6. IN COMPLIANCE. Applies to EU-70 and EU-71 only. Compliance with the emission rate of 0.22 lbs. per hour is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-CEMENTBOARD, VI.1 through 4.
7. IN COMPLIANCE. Applies to EU-72 only. Compliance with the emission rate of 0.14 lbs. per hour is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-CEMENTBOARD, VI.1 through 4.
8. IN COMPLIANCE. Applies to EU-42 and EU-43 only. The following emission units are in compliance with the following limits:
- EU-42: Facility reported particulate emissions of 6 pounds in 2022 and 4 pounds in 2023 (through August), below the permit limit of 0.30 tons annually.
- EU-43: Facility reported particulate emissions of 14 pounds in 2022 and 12 pounds in 2023 (through August), below the permit limit of 0.30 tons annually.

9. IN COMPLIANCE. Applies to EU-55 only. Facility reported particulate emissions of 110 pounds in 2022 and 74 pounds in 2023 (through August), below the permit limit of 6.76 tons annually.
10: IN COMPLIANCE. Applies to EU-70 and EU-71 only. The following emission units are in compliance with the following limits:
- EU-70: Facility reported particulate emissions of 74 pounds in 2022 and 45 pounds in 2023 (through August), below the permit limit of 0.97 tons annually.
- EU-71: Facility reported particulate emissions of 6 pounds in 2022 and 4 pounds in 2023 (through August), below the permit limit of 0.97 tons annually.
11. IN COMPLIANCE. Applies to EU-72 only. Facility reported particulate emissions of 14 pounds in 2022 and 12 pounds in 2023 (through August), below the permit limit of 0.60 tons annually.
12. IN COMPLIANCE. Applies to EU-42, EU-43, EU-70, EU-71, and EU-72. Compliance with the opacity limit of 7%, 6-minute average is demonstrated through compliance with the monitoring and recordkeeping requirements of FG-CEMENTBOARD, VI.1 through 4.
13. IN COMPLIANCE. Applies to EU-55 only. Testing performed on October 1, 2013, showed 0% opacity over a 6-minute average, demonstrating compliance with the permit limit of 7% opacity based on a 6-minute average.

III. Process/Operational Restrictions
1. IN COMPLIANCE. Disposal of any material collected by the dust collectors is reused in the process or disposed of in a manner which minimized the introduction of air contaminants to the ambient air.
2. IN COMPLIANCE. Facility implements and maintains a Preventative Maintenance/Malfunction Abatement Plan (PM/MAP) for FG-CEMENTBOARD, as required. A copy of the PM/MAP, dated 9/24/2020, was provided to AQD and can be found in the facility file.

IV. Design/Equipment Parameters
1a. through k. IN COMPLIANCE. Baghouse dust collectors are installed and operated as required.

V. Testing/Sampling
1. IN COMPLIANCE. Testing for PM emissions rates and visible emissions was performed on EU-55 on October 1, 2013. AQD has not requested testing for PM emission rates or visible emissions for the other emission units in FG-CEMENTBOARD.

VI. Monitoring/Recordkeeping
1. IN COMPLIANCE. Records are maintained in an acceptable format and made available to AQD, as required.
2. IN COMPLIANCE. The facility calculates and records the PM emissions from each emission unit in FG-MILL2 on a monthly and annual basis in a manner acceptable to AQD.
3a. through c. IN COMPLIANCE. The facility performs the monitoring and recordkeeping, as required by this condition. Differential pressure for each baghouse and visible emission observations are performed weekly.
4a. through e. IN COMPLIANCE. Inspections of baghouse collectors is performed on a daily and weekly basis. All preventative maintenance, repairs, and corrective actions are recorded, as required.

VII. Reporting
1. IN COMPLIANCE. Deviations are reported pursuant to GC 21 and 22 of Part A.
2. IN COMPLIANCE. Semiannual reports of monitoring and deviations are submitted by March 15 (for reporting period July 1 through December 31) and September 15 (for reporting period January 1 through June 30) each year, as required per GC 23 of Part A.
3. IN COMPLIANCE. Annual compliance certification is submitted by March 15 for the previous calendar year, as required per GC 19 and 20 of Part A.
4. IN COMPLIANCE. Performance test reports are submitted to AQD Technical Programs Unit and District Office.

VIII. Stack/Vent Restrictions

1 through 6. IN COMPLIANCE. According to facility documentation, stacks SV-42, SV-43, SV-55, SV-70, SV-71, and SV-72 meet permit specifications.

IX. Other Requirements
1. IN COMPLIANCE. Facility complies with the provisions of the National Standards of Performance for Nonmetallic Mineral Processing Plants, as specified in 40 CFR Part 60, Subparts A and OOO, as they apply to FG-55.

FGRULE287(2)(c). Associated Emission Unit ID: EU-44

II. Material Limits
1. IN COMPLIANCE. Based on usage records, EU-44 did not exceed 200 gallons of coating, minus water as applied, in any month during the compliance period. The highest coating usage during the compliance period was 44.25 gallons in March 2022.

IV. Design/Equipment Parameters
1. NOT APPLICABLE. EU-44 does not have an external exhaust.

VI. Monitoring/Recordkeeping
1a. IN COMPLIANCE. Facility maintains records of the volume of coating used, in gallons minus water, in EU-44 on a monthly basis.
1b. NOT APPLICABLE. EU-44 does not use a water wash or filters.

VII. Reporting
1. IN COMPLIANCE. Deviations are reported pursuant to GC 21 and 22 of Part A.
2. IN COMPLIANCE. Semiannual reports of monitoring and deviations are submitted by March 15 (for reporting period July 1 through December 31) and September 15 (for reporting period January 1 through June 30) each year, as required per GC 23 of Part A.
3. IN COMPLIANCE. Annual compliance certification is submitted by March 15 for the previous calendar year, as required per GC 19 and 20 of Part A.

PTI No. 75-21, Special Conditions

FG-PRLTEXP. Associated Emission Unit IDs: EU-74, EU-75, and EU-76.

I. Emission Limits
1 through 5: NOT EVALUATED. FG-PRLTEXP has only been in operation since June 2023 so no evaluation of 12-month rolling limits was performed. Emission testing is scheduled for October 2023.

II. Material Limits
1. NOT EVALUATED. FG-PRLTEXP has only been in operation since June 2023 so no evaluation of 12-month rolling limits was performed.

III. Process/Operational Restrictions
1. IN COMPLIANCE. The control devices for the emission units in FG-PRLTEXP are installed and maintained.
2. IN COMPLIANCE. Facility implements and maintains a Preventative Maintenance/Malfunction Abatement Plan (PM/MAP) for FG-PRLTEXP, as required. A copy of the PM/MAP, dated August 2022, was submitted to AQD on August 23, 2022, and can be found in the facility file.

IV. Design/Equipment Parameters
1. IN COMPLIANCE. The facility burns only natural gas in EU-75.
2. IN COMPLIANCE. The heat capacity of the furnace in EU-75 does not exceed 8 MMBtu per hour.
3. IN COMPLIANCE. A pressure gage for the baghouse of EU-75 is installed and maintained.

V. Testing/Sampling
1 and 2. NOT EVALUATED. EU-75 started operation in June 2023 and, at the time of inspection, had yet to reach maximum production rate. Testing of EU-75 is scheduled for October 2023.

VI. Monitoring/Recordkeeping
1. IN COMPLIANCE. Records are maintained on a monthly basis, as required.
2 and 3. IN COMPLIANCE. Visible emission readings are performed weekly on EU-74 and EU-75. Records of the readings are maintained.
4. IN COMPLIANCE. Baghouse pressure drop for EU-75 is recorded at least once per day.
5a. through d. IN COMPLIANCE. Facility performs calculations and maintains the required records on a monthly basis.

VII. Reporting
1 and 2. IN COMPLIANCE. Facility sent notification to AQD on March 11, 2022, that the installation of FG-PRLTEXP has been completed.

VIII. Stack/Vent Restrictions
1a. through c. IN COMPLIANCE. According to facility documentation, stacks SV-74, SV75, and SV-76 meet permit specifications.

IX. Other Requirements
1. IN COMPLIANCE. Facility complies with the provisions of Standards of Performance for New Stationary Sources, as specified in 40 CFR Part 60, Subparts A and UUU, as they apply to FG-PRLTEXP.

FINAL COMPLIANCE DETERMINATION
At the time of inspection, USG was determined to be in substantial compliance with the conditions of ROP No. MI-ROP-B3518-2021, PTI No. 75-21, and applicable State and federal air regulations.

NAME _____ DATE 8-9-24 SUPERVISOR JK