December 7, 1990

Wayne Bratz, Bellingham Terminal Manager
Tilbury Cement Co.
P.O. Box 37
Bellingham, WA 98225

Dear Mr. Bratz:

We have evaluated your "Notice of Intent to Operate and Application for Approval" received at our office on November 28, 1990 to build and operate a clinker transfer facility. Your application was reviewed to determine if your proposal complies with Northwest Air Pollution Authority Regulation 300 and 173-403 WAC.

Authorization to proceed with construction for temporary use is granted subject to the following conditions:

1. The facility is constructed and operated in accordance with the information contained in the application.

2. Water mist dust control shall be installed and operated at clinker transfer points.

3. A street sweeper shall be used on entry roads as necessary to prevent visible dust emissions from roadways.

4. A water wash or equivalent system shall be used to prevent trucks from tracking material onto public roads in sufficient quantities to cause visible dust emissions.

5. Visible dust emissions shall not be allowed from any point at the clinker loading facility.

6. Notice must be given to NWAPA at least 48 hours in advance each time the transfer facility is used.

7. Tilbury Cement shall comply with all requirements from other agencies having jurisdiction over the proposed project.

8. This authorization will expire on June 1, 1991.

Representing Island, Skagit and Whatcom Counties

Chairman: CR Caldwell, Commissioner, Island County
Vice-Chairman: Ruth Wykle, Commissioner, Skagit County
Bob Rhenish, Councilman, Whatcom County
Tim Douglas, Mayor, Bellingham - Cities & Towns
Kelsey Motzstad, Cities & Towns, Skagit County
Devin Anderson, Cities & Towns, Island County
Richard Rickinger, Member at Large
Terry L. Nyman, Air Pollution Control Officer
Please call me if you have any questions about the above requirements. I have enclosed a billing for $250 filing and review fee as per Section 324.

Sincerely,

Terry L. Nyman
Air Pollution Control Officer
April 25, 1996

Wayne Bratz  
Tilbury Cement  
741 Marine Drive  
Bellingham, WA 98225

ORDER OF APPROVAL TO CONSTRUCT NO. 587

Dear Mr. Bratz:

On April 1, 1996 you submitted a "Notice of Construction and Application for Approval" to construct and operate a new 200,000 ton per year air separator at your facility at 741 Marine Drive in Bellingham Washington. The separator will be located at the exit of the existing finish mill.

The information was reviewed to determine that all known, available, and reasonable air pollution control measures would be employed. The project was reviewed subject to Northwest Air Pollution Authority (NWAPA) regulation Section 302 and Washington Administrative Code (WAC) 173-400-110. A State Environmental Policy Act (SEPA) Determination of Non-Significance was issued by the Northwest Air Pollution Authority on April 25, 1996.

You are hereby authorized to construct and operate the air separator subject to the following conditions:

1. The project shall be constructed and operated in accordance with the information submitted in the Notice of Construction and Application for Approval.

2. The air separator and fabric filter shall be subject to the applicable parts of Title 40 Code of Federal Regulations (CFR) 60 Subpart OO—Standards of Performance for Nonmetallic Mineral Processing Plants of as of November 27, 1995.

3. Maximum opacity from the new equipment shall not exceed ten percent as measured by State of Washington Department of Ecology Source Test Method 9B for more than six minutes.

4. Total particulate emissions from the fabric filter shall not exceed 0.02 gr/acf.
5. All air pollution control devices shall be maintained and operated in accordance with operation and maintenance manuals that are kept on site and made available to NWAPA personnel upon request.

6. The finish mill shall not be operated unless it is vented to the air separator and fabric filter equipment which is in full use.

7. A mechanical gauge shall be installed and maintained to indicate the static pressure differential across the fabric filters at all times.

8. Dust collected by the fabric filter shall be discharged only into closed containers.

9. Notify the NWAPA in writing when the installation is complete and provide the expected date that the equipment will begin operation.

An on-site inspection may be required prior to issuance of a Certificate of Approval to Operate. Final approval to operate shall be conditioned upon the facility meeting the requirements described above and conditions set forth in the application and the applicable air pollution control regulations.

Please contact Valerie Lagen at (360) 428-1617 extension 207 if you have any questions about the approval of this project. A statement is enclosed for the Plan Examination Fee in the amount of $1000.00.

Sincerely,

Terry L. Nyman
Air Pollution Control Officer

Reviewed by: V.H. Lagen, P.E.

Enclosure
Northwest Clean Air Agency (NWCAA) hereby issues
Order of Approval to Construct (OAC) #931

Project Summary: Two dust collectors that are in a state of disrepair are being replaced with new BHA, 2,900 cfm, single cell, pulse-jet, fabric filtration dust collectors. Dust Collector ID#0001 will be used to control particulate emissions when unloading flyash from railcars. Dust collector ID#0002 will control particulate emissions when loading trucks with flyash or cement from a new buff tank.

Applicant
Wayne Bratz, Plant Manager
Lehigh Northwest Cement Company
P.O. Box 37
Bellingham, WA 98227

Owner
Lehigh Northwest Cement Company
P.O. Box 37
Bellingham, WA 98227

Facility Location:
741 Marine Drive, Bellingham, Washington
NWCAA Registration Number: 007-EM02-W

Best Available Control Technology (BACT) for the particulate matter associated with cement and flyash handling are dust collectors using fabric filtration achieving 99.99% control efficiency as demonstrated by the manufacturer’s guarantee.

As authorized by Northwest Clean Air Agency Regulation Section 300, this order is issued for operation of dust collectors #0001 and #0002 subject to the following restrictions and conditions:

1. Particulate emissions generated during the unloading of flyash from railcars and when loading trucks from the buff tank shall be controlled by dust collectors #0001 and #0002, respectively.

2. Visible emissions;
   a. From the dust collector stacks shall not exceed five-percent (5%) opacity for more than three minutes in any consecutive sixty-minute period as determined by Washington State Department of Ecology Method 9A.
b. There shall be no visible fugitive emissions from the dust collectors or the processes controlled by the dust collectors, except during maintenance activities. During maintenance activities, all reasonable precautions shall be taken to prevent the release of fugitive particulate matter.

c. Weekly qualitative observations of the dust collectors shall be conducted to assure that there are no visible emissions from the dust collector stacks or any fugitive emissions from the processes served by the dust collectors.

d. All visual observations taken to comply with this condition shall be recorded in a written log that includes the results of the observation, the emission unit observed, the time and date of the observation, and the name of the person taking the observation.

e. There is no requirement to take visual emission observations on a dust collector that does not operate during a particular calendar week.

3. Differential pressure drop across the dust collector;

a. A differential pressure gauge shall be installed on each dust collector that continuously measures the differential pressure drop across the collector's fabric filtration system.

b. An acceptable differential pressure drop range shall be established for each dust collector that is based on the manufacturer's recommendations and/or good engineering judgment, and posted next to the gauge.

c. Weekly readings of the differential pressure drop readings shall be taken on each dust collector to assure it is operating within the acceptable range.

d. All readings taken to comply with this condition shall be recorded in a written log that includes the differential pressure drop reading, the dust collector it was taken on, the time and date of the reading, and the name of the person taking the reading.

e. There is no requirement to take differential pressure drop readings on a dust collector that does not operate during a particular calendar week.

4. Excess Emissions;

a. If, at any time, the differential pressure drop of a dust collector is found to be outside the acceptable range established under condition 3, or there are visual emissions observed, the affected emission unit shall be immediately shut down until the problem has been identified and corrected.

b. A written log shall be made for of any excess emissions event identified by this condition. This log shall describe the event, the date and time it occurred, and the name of the person taking the corrective action.

5. A written operation and maintenance (O/M) manual for the dust collectors shall be developed and kept up-to-date. The O/M manual shall be consistent with the manufacturer's recommendations and shall include a record of the acceptable pressure drop across the fabric filtration system established pursuant to condition 3.
6. The facility shall keep a written log of all maintenance and repair work performed on the dust collectors. The log shall include, at minimum, all external and internal inspections, any fan or fabric filtration failures, repairs or replacements, the time and date that each activity was performed, and the name of the person performing the work.

7. Records required by this OAC shall be maintained on site for a period of no less than three years and shall be readily available for inspection by the NWCAA.

Dan Mahar, PE  Lynn Billington, PE  James Randles
Permitting Engineer  Reviewing Engineer  Director