WV Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Telephone Number: (304) 926-0475
Fax Number: (304) 926-0478

TITLE V OPERATING PERMIT ANNUAL COMPLIANCE CERTIFICATION[1]

Name of Permittee: Argos USA LLC	Name of Facility: Martinsburg Plant
Permit Number: R30-00300006-2017	AFS Plant ID Number: 03-54-00300006
Mailing Address: 1826 South Queen Street Martinsburg, WV 25401	Contact Person: Andrew Frye Title: Environmental Manager Telephone: (304) 260-1827

For the reporting period beginning 01 / 01 / 2017 and ending 12 / 31 /2017

Based upon the specific test methods, monitoring, recordkeeping and/or reporting required under the permittee's Title V Operating Permit and any other information reasonably available, I, the undersigned, hereby certify for the reporting period stated above:

a. The permittee has been in compliance with all General Conditions 2.3.2, 2.3.3, 2.5.1.a and b, 2.10, 2.11.2, 2.12, 2.13.1, 2.14, 2.15, 2.19, 2.20, and 2.25 of the permittee's Title V Operating Permit, except to the extent that the permittee's Title V Operating Permit and underlying rules explicitly provide for exception periods or where deviations have been identified in either the 1st Half Semi-annual Monitoring Report previously submitted or the 2nd Half Semi-annual Monitoring Report attached to this certification;

b. I have reviewed all facility-wide and source specific requirements of the permittee's Title V Operating Permit, and certify compliance of all air pollutant emitting equipment and processes subject to facility-wide and source specific requirements of the permittee's Title V Operating Permit with all such requirements including all emission limitations and standards set forth in the referenced permit, except to the extent that the permit and underlying rules explicitly provide for exception periods or where deviations have been identified in either the 1st Half Semi-Annual Monitoring Report previously submitted or the 2nd Half Semi-Annual Monitoring Report attached to this certification.

c. Based on information and belief formed after reasonable inquiry, the statements and information in this document and attachments are true, accurate, and complete.[1]

Responsible Official[2]

Name: Heinz Knopfel	Title: Plant Manager
Signature:	Date: MARCH 9/2018

Note: Please check all required attachments included with this Annual Compliance Certification.

DAQ	☒ Form A – Annual Compliance Certification ☒ Semi-Annual Monitoring Report for the 2nd Half (July 1st through December 31st) *Submit signed electronic copy by e-mail to:* DEPAirQualityReports@wv.gov
EPA	☒ Form A – Annual Compliance Certification ☒ Semi-Annual Monitoring Report for the 1st Half (January 1st through June 30th) ☒ Semi-Annual Monitoring Report for the 2nd Half (July 1st through December 31st) *Submit signed electronic copy by e-mail to:* R3_APD_Permits@epa.gov

[1] Please note that the West Virginia Code states that any person who knowingly misrepresents any material fact in an application, record, report, plan or other document filed or required to be maintained is guilty of a misdemeanor and may be subject to fines and/or imprisonment in accordance with W.VA. Code §22-5-6(b).

[2] A Responsible Official as defined by 45CSR§30-2.38. must sign this certification.

Form A - Annual Compliance Certification

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Emission Unit ID	Condition Number of Permit Requirement	Term or Condition that is the Basis for Certification	Method or Means of Determining Compliance Status[1]	Was the source in compliance for the reporting period?	If no, how many deviations occurred during the reporting period?	If deviations occurred, indicate when deviations were reported?
Facility-Wide	2.1	Definitions	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.2	Acronyms	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.3	Permit Expiration and Renewal	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.4	Permit Actions	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.5	Reopening for Cause	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.6	Administrative Permit Amendments	No Class I or II Administrative Permit Amendments were submitted during 2017. However the Plant did submit two permit determination requests on 10/12/17 for the kiln baghouse replacement project and the activated carbon injection system. WV DEP determined on 11//8/17 and 11/9/17, respectively, that neither project required a permit.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	2.7	Minor Permit Modifications	The Martinsburg Plant did not request any minor permit modifications during the reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.8	Significant Permit Modifications	The Martinsburg Plant did not request any significant permit modifications during the reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.9	Emissions Trading	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.10	Off-Permit Changes	The Martinsburg Plant did not request any off-permit changes during the reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.11	Operational Flexibility	The Martinsburg Plant did not request any operational flexibility changes during the reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.12	Reasonably Anticipated Operating Scenarios	The Martinsburg Plant did not operate under any alternative scenarios during the reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	2.13	Duty to Comply	The Martinsburg Plant has not complied with all conditions of Title V Permit. All deviations are identified in the Annual Compliance Certification.	☐ Yes ☒ No ☐ N/A	29	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification
Facility-Wide	2.14	Inspection and Entry	WV DEP representatives were allowed entry to the premises at all times during the reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.15	Schedule of Compliance	The Martinsburg Plant is not subject to a compliance schedule.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.16	Need to Halt or Reduce Activity not a Defense	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.17	Emergency	The Martinsburg Plant did not experience an Emergency as defined in Section 2.17 during the reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.18	Federally-Enforceable Requirements	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	2.19	Duty to Provide Information	WV DEP did not request any information from the Plant during the reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.20	Duty to Supplement and Correct Information	The Martinsburg Plant is not aware of any instances where incorrect information was submitted during the reporting period requiring a supplemental information submittal.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.21	Permit Shield	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.22	Credible Evidence	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.23	Severability	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	2.24	Property Rights	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	2.25	Acid Deposition Control	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.1	Open Burning	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.2	Open Burning Exemptions	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.3	Asbestos Removal Notifications	No asbestos removal was conducted at the Martinsburg Plant during the 2017 calendar year.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.4	Odor	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
N/A	3.1.5	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.1.6	Standby Plan for Reducing Emissions	The Martinsburg Plant was not requested by the WV DEP to prepare a standby plan for reducing emissions during the reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.7	Emission Inventory	The Annual Emissions Inventory for calendar year 2016 was submitted to the WV DEP on 3/29/17 in compliance with the WV DEP due date of 3/31/17.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.8	Ozone-Depleting Substances	The Martinsburg Plant does not perform maintenance, service, repair or disposal of appliances as part of its normal operations.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.9	Risk Management Plan	The Martinsburg Plant is not subject to 40 CFR 68.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.10	20% Opacity Limit	The Martinsburg Plant operated the facility such that observed opacity at the plant property line was less than 20% during the reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.11	40% Opacity Limit	Condition 3.1.10 does not apply to process sources which emit less than 40% opacity for aggregate periods of less than 5 minutes per hour.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.1.12	Visible Emissions from Storage Structures	The Martinsburg Plant makes every effort to operate the facility such that no visible emissions are observed from any storage structure that is required to have full enclosure and be equipped with a PMCD. However, WV DEP notified the facility of observed opacity from storage structures on the following dates: 2/2/2017 – Main Clinker Storage Silo 2/28/2017 – Main Clinker Storage Silo In all instances, the Plant responded to WV DEP as soon as feasible with documentation of the cause of the opacity and corrective actions being taken.	☐ Yes ☒ No ☐ N/A	2	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification
N/A	3.1.13	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.14	Stack Requirements	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.15	Minimize Fugitive PM	The Martinsburg Plant employs partial enclosures, full enclosures, tarp coverings, foam suppression, or wet suppression controls on all process sources which generate fugitive emissions to minimize the emissions of fugitive particulate matter.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.1.16	Roads and Piles Dust Control	The Martinsburg Plant main access roads are paved to assist with dust control. Watering and sweeping of all paved roads and watering of unpaved roads is done daily or as needed to maintain dust control on the Plant premises.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.17	Allowable Emission Exceedances due to Equipment Malfunctions	The Martinsburg Plant did not submit any requests to the WV DEP during the reporting period to request additional time to correct major equipment malfunctions.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.18	Maintenance Operations	The Martinsburg Plant conducted all maintenance operations during the reporting period in a manner consistent with good air pollution control practices for minimizing emissions.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.19	Raw Mill/Finish Mill 10% Opacity Limit	Finish Mill 1 and 2 are equipped with COMS to monitor opacity. The Finish Mill 1 COMS recorded one six-minute period on 11/28/17 where Finish Mill 1 exceeded its 10% opacity limit. The Finish Mill 2 COMS did not record any instances where opacity exceeded 10% for Finish Mill 2 during the 2017 reporting period. Finish Mill 3 is not equipped with COMS, so daily 6-minute Method 22s are required. Based on a review of records, there were no instances during 2017 where visible emissions were observed for two consecutive days requiring the conduct of a Method 9.	☐ Yes ☒ No ☐ N/A	1	☐ 1st Half (January 1st through June 30th) ☒ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.1.20	40 CFR 63 Subpart LLL Process Equipment 10% Opacity Limit	Monthly 10-minute Method 22s observation documentation shows that when visible emissions were observed corrective actions were initiated to resolve the issue. However, during 9 months in 2017, the 30-minute Method 9s required to be conducted within one hour of observing a visible emissions were not conducted.	☐ Yes ☒ No ☐ N/A	9	☒ 1st Half (January 1st through June 30th) ☒ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.21	40 CFR 63 Subpart LLL Compliance Date	Not Applicable – Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
EP42.04	3.1.22	Subpart LLL Emission Limits for Existing Kilns	Per the extension request granted by WV DEP on 7/1/15, the Martinsburg Plant was required to demonstrate initial compliance with its HCl emission limit for the Preheater/Precalciner Kiln System by conducting initial performance tests within 180 days of 9/9/16. The Martinsburg Plant demonstrated initial compliance with its HCl emission limit during performance testing conducted February 7 through 16, 2017, within the allowed 180 day period. The Preheater/Precalciner Kiln System was in compliance with its HCl limit from February 7, 2017 through December 31, 2017. The Preheater/Precalciner Kiln System was in compliance with its PM and THC limit for the 2017 calendar year. However, the Preheater/Precalciner Kiln System exceeded its Hg limit and D/F temperature limits during the 2017 calendar year as documented in the semiannual PC MACT Summary Reports submitted on 7/27/17 and 1/25/18	☐ Yes ☒ No ☐ N/A	2	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification

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Facility-Wide	3.1.23	General Duty to Minimize Emissions	Based upon review of operation and maintenance records, the Martinsburg Plant operated and maintained all sources, including air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.24	40 CFR 63.1345 Initial PC MACT Performance Tests for Non-Kiln Sources	No new emission sources subject to PC MACT began operation during the 2017 reporting year, so no initial performances tests were required to be completed.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.25	Compliance Requirements for D/F	The Preheater/Precalciner Kiln System demonstrated compliance with its D/F limits during its most recent performance test conducted June 13, 2017 through June 22, 2017. New temperature limits were also established for the inlet to the Main Kiln Baghouse and Kiln Bypass Baghouse, which were documented in the report submitted via CEDRI on 11/13/17.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.1.26	Startup and Shutdown Requirements	The Preheater/Precalciner Kiln System was in compliance with all PC MACT startup and shutdown requirements during the 2017 calendar year. The Plant maintains records to demonstrate that only clean fuels were used in the Preheater/Precalciner Kiln System until it reached 1200°F during startup. The dry sorbent and ACI systems were turned on and available for use during all startups in 2017 at the time the gas stream at the inlet to the main baghouse reached 300° F.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.1.27	Startup and Shutdown Compliance	The dry sorbent and ACI systems were turned on and available for use during all startups in 2017 at the time the gas stream at the inlet to the main baghouse reached 300° F.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.2.1	O&M Plan	The Martinsburg Plant O&M Plan was last updated in July 2016 and was submitted to WV DEP as part of the Title V Operating Permit Renewal Application.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	3.2.2	COMS Operation in lieu of Visible Emission Monitoring	Review of the Finish Mill 1 and 2 COMS downtime reports determined that the Finish Mill COMS were operational for all days when the Finish Mills operated. Therefore, no 6-minute visible emission monitoring was required to be conducted on Finish Mill 1 or 2 during the 2017 calendar year. However, Finish Mill 1 COM documented one 6-minute exceedance of the 10% opacity limit during the 2017 calendar year.	☐ Yes ☒ No ☐ N/A	1	☐ 1st Half (January 1st through June 30th) ☒ 2nd Half (July 1st through December 31st)
N/A	3.2.3	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU2, EU6	3.2.4	Raw Mill/Finish Mill Daily Visible Emissions Observations	The Martinsburg Plant operates an inline raw mill system that is controlled by the main kiln baghouse, which vents to the main stack and is monitored by the kiln PM CPMS. Finish Mills 1 & 2 are each monitored by their own dedicated COMS. Daily 6-Minute Method 22 observations for all Finish Mill 3 sources were conducted as required during the 2017 reporting period, except during 7 days.	☐ Yes ☒ No ☐ N/A	7	☒ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Group EU2, EU6	3.2.4(1)	Raw Mill/Finish Mill Daily Visible Emissions Observations	Per review of records, when visible emissions were observed from Finish Mill 3; corrective actions were initiated and the finish mill returned to normal operation the following day.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU2, EU6	3.2.4(2)	Raw Mill/Finish Mill Daily Visible Emissions Observations	Per a review of records, there were no instances during 2017 when visible emissions were observed on two consecutive days from any Finish Mill 3 emission source. Therefore, no follow-up Method 9 observations were required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	3.2.5(1-5)	D/F Temperature Monitoring	Thermocouples continuously monitor the temperature of the exhaust gases from the kiln main baghouse and bypass baghouse at the inlet to each PM control device. 3-hour rolling averages were calculated as required. All exceedances are documented in the applicable PC MACT Summary Reports. Thermocouples are also required to be re-calibrated every three months. No thermocouple calibrations were conducted during the 4th quarter of 2017.	☐ Yes ☒ No ☐ N/A	See Semiannual Monitoring Report	☒ 1st Half (January 1st through June 30th) ☒ 2nd Half (July 1st through December 31st)
N/A	3.2.6	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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EU2,EU3, EU4, EU6, EU7	3.2.7(1)	PC MACT Monthly 10-Minute Opacity Monitoring	Monthly 10-minute Method 22 observations as specified in the O&M Plan are required to be performed for all PC MACT affected sources. Monthly 10-minute visible emission testing was conducted and recorded as required for all PC MACT affected sources during the 2017 calendar year. However, there were 30 instances during 2017 when the required 30-minute Method 9, which are required to be conducted within one hour of observing a visible emissions, were not completed.	☐ Yes ☒ No ☐ N/A	30	☒ 1st Half (January 1st through June 30th) ☒ 2nd Half (July 1st through December 31st)
Group EU2, EU6	3.2.7(2)	Raw Mill/Finish Mill Daily Visible Emissions Observations	Compliance with raw mill and finish mill opacity requirements is addressed in response to Condition 3.2.4.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	3.2.8	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.2.9	Alternative Monitoring	The Martinsburg Plant did not need to submit any alternative monitoring requests during the reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.2.10	Raw Mill/Finish Mill Opacity Monitoring Alternatives	The Martinsburg Plant operates a PM CPMS for the inline raw mill as part of the kiln system (located on the main stack) and a COMS for Finish Mill 1 and Finish Mill 2 (located on their respective stacks). The PM CPMS passed an annual RATA on 5/3/17. Finish Mill 1 and 2 COMS passed an annual certification on 5/19/17.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.2.11	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.2.12(a)	Fugitive Weekly Visible Emission Monitoring	Weekly Visible Emission Monitoring for all fugitive particulate emission activities was conducted as required for all weeks during the 2017 reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.2.12(b)	Fugitive Weekly Visible Emission Recordkeeping	Weekly Visible Emission Monitoring for all fugitive particulate emission activities was documented as required for all weeks during the 2017 reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.2.13	Dust Collectors Weekly Visible Emission Monitoring and Recordkeeping	Weekly dust collector inspections were conducted during the reporting period and records of the inspections are retained in the Environmental Manager's office, with the exception of those noted below. The inspections included visible emission monitoring and pressure drop observations for all dust collectors. All maintenance performed on the dust collectors is documented within the Plant SAP work order system. Weekly visible emission observations were not conducted on dust collectors during the weeks of 2/19/17, 4/9/17, and 4/16/17.	☐ Yes ☒ No ☐ N/A	3	☒ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.2.14	Dust Control Records and Inspections	Daily roadway watering records are available for the 2017 reporting year. Records are also available to document dust collector inspections conducted during the reporting period. All maintenance performed on the dust collectors is documented within the Plant SAP work order system.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.2.15	Development and Submittal of Monitoring Plans	The Martinsburg Plant developed a Site Specific Monitoring Plan in July 2015 that meets all of the requirements of 40 CFR 63.1350(p), which is available to be provided to the WV DEP upon request.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.2.16	Continuous Emissions Rate Monitoring Systems for PM, THC, HCl (or SO2), and Mercury	Continuous emission rate monitoring systems for PM, Hg, and THC were operated, calibrated, and maintained per the requirements of Section 3.2.16 during the 2017 calendar year. Initial compliance with the HCl emission limit was demonstrated on 2/9/17 and a SO_2 site-specific operating limit was established. The SO_2 continuous emission rate monitoring system was operated, calibrated, and maintained per the requirements of Section 3.2.16 during the 2017 calendar year. Review of the 2017 emissions records determined that the Preheater/Precalciner kiln system was in compliance with its emission limits for PM, THC/OHAP, and HCl/SO_2. However, the Preheater/Precalciner kiln system exceeded its 55.0 lb/MM ton clinker 30-day rolling Hg limit on 4/4/17. In addition, the continuous emission rate monitoring systems for PM, THC, SO_2, and Hg experienced downtime during the reporting period and were not continuously operated, as documented in the Semiannual Monitoring Reports.	☐ Yes ☒ No ☐ N/A	See Semiannual Monitoring Reports	☒ 1st Half (January 1st through June 30th) ☒ 2nd Half (July 1st through December 31st)
Facility-Wide	3.2.17	Parameter Monitoring Requirements	The Martinsburg Plant calibrated, maintained, and operated a PM CPMS, THC CEMS for demonstration of compliance with the alternate total organic HAP limit, SO_2 CEMS for demonstration of compliance with the HCl limit, and Hg CEMS during 2017 per the parameter monitoring requirements specified in 40 CFR 63.1350(m).	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.3.1	Stack Testing Protocols, Notifications, and Reports	Per 45 CSR 13 all stack testing protocols are required to be submitted at least 30 days prior to testing, stack testing notifications are required to be submitted at least 15 days prior to testing, and stack test reports are required to be submitted within 60 days of completion of the test. The annual NO_X, SO_2, CO, CO_2, THC CEMS RATA was conducted on 4/24/17. A protocol and notification of the testing was submitted to WV DEP on 3/23/17, as required. The RATA report was submitted via CEDRI on 6/21/17, as required. The annual Mercury CEMS RATA was conducted on 8/22/17. A protocol and notification of the testing was submitted to WV DEP on 7/19/17, as required. The RATA report was submitted via CEDRI on 11/2/17, which was not within the required 60 days from testing. The annual PM stack testing was conducted from April 25 to May 3, 2017. A protocol and notification of the testing was submitted to WV DEP on 3/23/17, as required. The stack testing report was submitted via CEDRI on 6/21/17, as required. D/F stack testing was conducted from June 13 to 22, 2017. A protocol and notification of the testing was submitted to WV DEP on 3/23/17, as required. The stack testing report was submitted via CEDRI on 11/13/17, which was not within the required 60 days from testing. HCl stack testing was conducted from February 7 to 16, 2017 and on 6/28/17. A protocol and notification for the first stack test was submitted to WV DEP on 11/22/16, as required. The second stack test utilized the same protocol and notification was provided to WV DEP as required on 6/6/17. The stack testing reports were submitted via CEDRI on 4/6/17 and 11/2/17. The second test report was not submitted within the required 60 days from testing.	☐ Yes ☒ No ☐ N/A	3	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification

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Facility-Wide	3.3.2	40 CFR 63 Subpart LLL Performance Test Reporting	All PC MACT performance testing reports submitted during the 2017 calendar year contained the information required by Section 3.3.2.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.3.3(1)	PM Kiln and Clinker Cooler Stack Testing & PM CPMS	PM performance testing was last conducted on the Preheater/Precalciner Kiln System from April 25 to May 3, 2017. A PM CPMS SSOL was established on 6/1/17 when the final stack testing results were provided to the Martinsburg Plant. The stack testing report was submitted via CEDRI on 6/21/17.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.3.3(2)	Initial Method 9 Subpart LLL Performance Testing	No PC MACT affected sources began operation during the 2017 reporting year, so no initial Method 9 Performance Testing was conducted.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.3.3(3)	D/F Testing	Initial D/F Performance Testing was conducted on the Preheater/Precalciner kiln system from 3/27/10 to 3/28/10 with the report submitted to WV DEP on 5/28/10. D/F Performance Testing is required to be repeated every 30 months. The most recent D/F Performance Testing was conducted from June 13 to 22, 2017. The stack testing report was submitted via CEDRI on 11/13/17.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.3.3(4)	THC CEMS	A THC CEMS was operated during the 2017 reporting year per the requirements of 40 CFR 63.1350(i). The annual THC CEMS RATA was conducted on 4/24/17.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.3.3(5)	Mercury CEMS or Sorbent Trap Monitoring System	A Mercury CEMS was operated during the 2017 reporting year per the requirements of 40 CFR 63.1350(k). The Martinsburg Plant demonstrated initial compliance with its Mercury 30-day rolling limit at the end of the first 30 operating days starting on 9/9/16, which was 10/12/16. The annual Mercury CEMS RATA was last conducted on 8/22/17.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.3.3(6)	HCl Performance Testing	Initial HCl stack testing was conducted from February 7 to 16, 2017 demonstrating compliance with the HCl emission limit and establishing a SO_2 SSOL. Additional HCl stack testing was conducted on 6/28/17 to establish a lime injection rate alternate monitoring parameter for low-alkali clinker production.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.3.3(7)	O-HAP Performance Testing	Initial O-HAP performance testing was conducted on the Preheater/Precalciner Kiln System from April 6 to 7, 2016.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.3.4	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.3.5	Performance Test Frequency	Performance tests for D/F, OHAP, and HCl are required to be conducted on the Preheater/Precalciner Kiln System every 30 months, and must be completed no more than 31 months after the previous test. PM performance tests are required to be conducted on the Preheater/Precalciner Kiln System every 12 months, and must be completed no more than 13 months after the previous test. D/F Performance Testing was previously conducted from September 22 to October 8, 2014. D/F Performance Testing was repeated from June 13 to 22, 2017, which was more than 31 months from the previous testing. PM Performance Testing was previously conducted from April 6 to 7, 2017. PM Performance Testing was repeated from April 25 to May 3, 2017, as required. OHAP was initially conducted from April 6 to 7, 2017 and is not required to be repeated until 2018. HCl Performance Testing was initially conducted from February 7 through 16, 2017 and is not required to be repeated until 2019.	☐ Yes ☒ No ☐ N/A	1	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification
Facility-Wide	3.3.6	Operation Change Testing Requirement	The Martinsburg Plant did not undertake a change in operations that adversely affected compliance with the D/F limit during the reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.3.7	Performance Testing Requirements	Per PC MACT requirements all performance tests are required to be submitted via CEDRI within 60 days from the test date and must be signed by a responsible official. The annual PM stack testing was conducted from April 25 to May 3, 2017. The stack testing report was submitted via CEDRI on 6/21/17, as required. D/F stack testing was conducted from June 13 to 22, 2017. The stack testing report was submitted via CEDRI on 11/13/17, which was not within the required 60 days from testing. HCl stack testing was conducted from February 7 to 16, 2017 and on 6/28/17. The stack testing reports were submitted via CEDRI on 4/6/17 and 11/2/17. The second test report was not submitted within the required 60 days from testing. In addition, all performance test reports were signed by the Environmental Manager, not the Plant Manager, who is the Martinsburg Plant's designated responsible official.	☐ Yes ☒ No ☐ N/A	3	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification
Facility-Wide	3.3.8	Conditions of Performance Tests	All performance tests conducted during the 2017 calendar year were conducted under representative operating conditions.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.4.1	Monitoring Information Records	Copies of all stack tests and monitoring performed at the Martinsburg Plant are kept in the Environmental Manager's office and contain all required information. However, records are lacking demonstration that all required Method 9 monitoring for Permit Condition 3.1.20 has been completed.	☐ Yes ☒ No ☐ N/A	Method 9 documentation lacking	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification

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Facility-Wide	3.4.2	Retention of Monitoring Records	CEMS and Thermocouple monitoring data is available for the Preheater/Precalciner kiln since it began normal operation in April 2010. All calibration and audit records are also available since April 2010. However, records of all required Method 9 monitoring for Permit Condition 3.1.20 have not been retained as required.	☐ Yes ☒ No ☐ N/A	Method 9 documentation lacking	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification
Facility-Wide	3.4.3	Odors	No odor complaints were received by the Martinsburg Plant during the reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.4.4	Retention of Records	All records required by the Title V Permit (including reports and notifications) are maintained by the Martinsburg Plant for the last 5 years.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.4.5	Recordkeeping Requirements	All maintenance records are kept in the SAP work order database and all COMS/CEMS records are kept in the COMS/CEMS system in the control room. All available records of CMS calibrations and audits are kept in the Environmental Manager's office.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.4.5(1)	Recordkeeping Requirements	All records of notices of compliance status are located in the Environmental Manager's office.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.4.5(2)	Recordkeeping Requirements	All records regarding applicability determinations are located in the Environmental Manager's office.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.4.5(3)	Recordkeeping Requirements	The Martinsburg Plant has not been granted a waiver under 40 CFR 63.1355(b).	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.4.6	COMS Recordkeeping Requirements	The Martinsburg Plant COMS database records all opacity records required by 40 CFR 63.10(c) for the Finish Mill 1 and 2 COMS. All maintenance records are kept in the SAP work order database. COMS manuals are kept in the Electrical Inspector's office.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.4.7	Recordkeeping Requirements	All records pertaining to daily clinker production rates and kiln feed rates are retained as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.4.8	Recordkeeping Requirements	All records regarding startup and shutdown periods, including quantity of feed and fuel during startup and shutdown periods, are retained as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.4.9(1)	Recordkeeping Requirements	All records of any malfunctions that resulted in a source failing to meet an applicable standard are retained as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.4.9(2)	Recordkeeping Requirements	All repair records to restore malfunctioning equipment are retained as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.4.10	Recordkeeping Requirements	All exceedance records and records of corrective actions taken, in addition to repeat performance test records that were triggered in response to an exceedance are retained as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.1	Responsible Official	All application forms, reports, and compliance certifications submitted to the WV DEP during the reporting period were signed by the Plant Manager who is the designated responsible official for the Martinsburg Plant.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.2	Confidential Requests	The Martinsburg Plant did not request confidential treatment for any reporting submission made during the reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.3	Submittal Addresses	Not Applicable - Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.4	Certified Emission Statement	A Certified Emission Statement Invoice and fee for the 2016 calendar year was sent to the WV DEP on 7/18/17, prior to the 7/31/17 due date.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.5.5	Compliance Certification	The Martinsburg Plant submitted the annual Title V Compliance Certification for the 2016 calendar year on 3/15/17, which was in compliance with the 3/15/17 due date.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.6	Semiannual Monitoring Reports	The Martinsburg Plant submitted the Semiannual Monitoring Report for the first half of the 2017 calendar year on 9/7/17, which was in compliance with the 9/15/17 due date. The Semiannual Monitoring Report for the 2nd half of the 2017 calendar year is submitted with this annual compliance certification.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.7	Emergencies	No emergency situations occurred at the Martinsburg Plant during the reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.8	Deviations	The Martinsburg Plant did not experience an Emergency as defined in 45 CSR §30-5.7 during the reporting period; therefore, no deviation reporting was required to be submitted.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.9	New Applicable Requirements	Regulations applicable to the Martinsburg Plant under 40 CFR 63 Subpart LLL were revised during the reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.5.10(1)	Initial Notification Requirements	The Martinsburg Plant submitted an initial notification of the startup of the Plant to WV DEP on 9/15/09. No new emissions sources began operation during the 2017 calendar year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.10(2)	Performance Test Notification (Subpart LLL)	Notification of performance tests is required to be submitted to WV DEP at least 15 days prior to testing. The annual PM stack testing was conducted from April 25 to May 3, 2017. A protocol and notification of the testing was submitted to WV DEP on 3/23/17, as required. D/F stack testing was conducted from June 13 to 22, 2017. A protocol and notification of the testing was submitted to WV DEP on 3/23/17, as required. HCl stack testing was conducted from February 7 to 16, 2017 and on 6/28/17. A protocol and notification for the first stack test was submitted to WV DEP on 11/22/16, as required. The second stack test utilized the same protocol and submitted its notification to WV DEP on 6/6/17, as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.10(3)	Opacity and VE Observation Notification	No new emissions sources began operation during the 2017 reporting period, therefore, no initial Method 9 Performance Tests were conducted by the Plant.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.5.10(4)	CEMS Performance Evaluation Notification	Notification of performance evaluations is required to be submitted to WV DEP at least 15 days prior to testing. The annual NO_X, SO_2, CO, CO_2, THC CEMS RATA was conducted on 4/24/17. A protocol and notification of the testing was submitted to WV DEP on 3/23/17, as required. The annual Mercury CEMS RATA was conducted on 8/22/17. A protocol and notification of the testing was submitted to WV DEP on 7/19/17, as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.10(5)	Notice of Compliance Status	The Martinsburg Plant submitted an initial notice of compliance (NOC) for PC MACT HCl limits to the WV DEP on 4/17/17, which was 60 days from the initial performance test completed on 2/16/17, as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.10(6)	Notification of Performance Re-Testing	Performance test notifications are required to be submitted for any exceedances that triggered retesting to establish new PC MACT site specific operating limits (SSOL). There were no exceedances of the PM, HCl/SO2, or THC/OHAP SSOLs during the 2017 calendar year, therefore no notifications were required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.11(1)	Initial Performance Test Results with NOC	The Martinsburg Plant submitted an initial notice of compliance (NOC) for PC MACT HCl limits to the WV DEP on 4/17/17. The NOC included the results of the initial performance test, as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.5.11(2)	Opacity Reporting	No Initial Method 9 Performance Tests were conducted during the 2017 calendar year. Therefore no test reports were required to be submitted.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.11(3)	Progress Reports	The Martinsburg Plant was not required to submit progress reports during the reporting period as a condition of receiving an extension of compliance.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.11(4)	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.11(5)	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.11(6)	CMS Performance Evaluation Reporting	The annual NO_X, SO_2, CO, CO_2, THC CEMS RATA was conducted on 4/24/17. The RATA report was submitted via CEDRI on 6/21/17, as required. The annual Mercury CEMS RATA was conducted on 8/22/17. The RATA report was submitted via CEDRI on 11/2/17, which was not within the required 60 days from testing.	☐ Yes ☒ No ☐ N/A	1	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification

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Facility-Wide	3.5.11(7)	COMS Performance Evaluation Reporting	The Preheater/Precalciner Kiln System is no longer subject to an opacity standard as of 9/9/15, so a COMS is not required to be operated for this source during performance testing.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.11(8)	Excess Emission and Continuous Monitoring System Performance Report	Per Condition 3.5.11(10), excess emission and continuous monitoring system performance reports are only required when a continuous monitoring system downtime for a semiannual reporting period is ten percent or greater. Per the PC MACT semiannual reports submitted by the Martinsburg Plant on 7/27/17 and 1/25/18, all continuous monitoring systems used to demonstrate compliance with PC MACT limits operated with downtime less than 10% of the total operating time for both of the 2017 semiannual reporting periods.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.11(9)	Semiannual Summary Report	The Martinsburg Plant submitted via CEDRI the Semiannual PC MACT Summary Reports required by 40 CFR 63.1354(b) for the 2017 calendar year on 7/27/17 and 1/25/18.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.11(10)	Excess Emissions and CMS Performance Report	The total continuous monitoring system downtime for each system at the Martinsburg Plant was less than 10% of the total operating time as documented in the PC MACT Semiannual Reports submitted via CEDRI on 7/27/17 and 1/25/18.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.5.12	Malfunction Reporting	There were no malfunctions during the 2017 reporting year that resulted in a failure to meet a PC MACT emissions standard. Therefore no malfunction reporting was required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	3.6.1	Compliance Plan	Not Applicable - Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.7.1	Permit Shield	Not Applicable - Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	3.7.2	Permit Shield Requirements	Not Applicable - Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.1.1	Clinker Production	Based on Plant production records the Martinsburg Plant is in compliance with its 12-month rolling clinker production limit of 2,212,890 short tons per year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.1.2	Facility Wide Emissions	Based on a review of the Martinsburg Plant's production data and emissions calculations, the Plant is in compliance with all Facility-Wide 12-month rolling emissions limits for the 2017 calendar year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.1.3	Startup, Shutdown, and Malfunction	During periods of startup, shutdown, or malfunction during 2017 the Martinsburg Plant followed the applicable procedures in the Operation and Maintenance Plan.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Facility-Wide	4.1.4	Road Watering	Watering and sweeping, as applicable, of all plant and quarry roads is performed daily or additionally as needed to maintain dust control on the Plant premises.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.1.5	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.1.6	Kiln D/F Temperature Limit	The temperature of the exhaust gas at the inlet of the main kiln baghouse and bypass baghouse are continuously monitored. All exceedances are documented in the applicable PC MACT Summary Report.	☐ Yes ☒ No ☐ N/A	See Semiannual Monitoring Report	☒ 1st Half (January 1st through June 30th) ☒ 2nd Half (July 1st through December 31st)
CD42.04	4.1.7	Kiln D/F Temperature Limit Determination	The temperature limits of the exhaust gas at the inlet of the main kiln baghouse and bypass baghouse were determined during the most recent stack test conducted from June 13 to 22, 2017.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.1.8	Construction Permit Compliance	The Martinsburg Plant was constructed and operated in accordance with Permit R14-026M.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Group EU1	4.1.9	Emission Limits	Review of the Plant 2017 emissions calculations determined that all sources within Group EU1 were not in compliance with their listed emission limits for the reporting year. Emission Units EP0X.03.02 and EP0X.03.03 exceeded their individual emission limits. However, the Plant maintained compliance with the Group EU1 emission limit during the 2017 calendar year.	☐ Yes ☒ No ☐ N/A	2	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification
Group EU1	4.1.10	Subpart OOO Stack Particulate and Opacity Standards	No new 40 CFR 60 Subpart OOO permitted emission sources equipped with a baghouse and attending stack began operation during the reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU1, EU2, EU8, EP37.15	4.1.11	Subpart OOO Fugitive Opacity Standards	No new 40 CFR 60 Subpart OOO permitted fugitive emission sources began operation during the reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU1, EU2, EU8, EP37.15	4.1.12	Subpart OOO Crusher Opacity Standards	No new 40 CFR 60 Subpart OOO permitted crusher emission sources began operation during the reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU2	4.1.13	Emission Limits	Review of the Plant 2017 emissions calculations determined that all sources within Group EU2 were not in compliance with their listed emission limits for the reporting year. Emission Units EP39.14, EP39.15, and EP39.16 exceeded their individual emission limits. However, the Plant maintained compliance with the Group EU2 emission limit during the 2017 calendar year.	☐ Yes ☒ No ☐ N/A	3	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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N/A	4.1.14	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.1.15	Kiln Fuel Usage	Review of Plant fuel records determined that the Preheater/Precalciner kiln only combusted allowed fuels as specified in Section 4.1.15.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.1.16	Alternate Fuels	The Martinsburg Plant did not submit any requests to burn alternate fuels to the WV DEP during the 2017 reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.1.17	Fuel Oil Usage	The Preheater/Precalciner kiln can use fuel oil during periods of startup and fuel system maintenance or malfunction.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Kiln #7 EP10.01	4.1.18	Petroleum Hydrocarbon Contaminated Soils Requirements	The Martinsburg Plant utilized petroleum hydrocarbon contaminated soils in the Preheater/Precalciner kiln during the 2017 reporting period. The Plant was in compliance with all requirements stipulated in Condition 4.1.18.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.1.19	Clinker Production	Review of 2017 production records determined that the Preheater/Precalciner kiln did not exceed the 2,212,890 short tons per year clinker production limit.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Kiln 7 EU10.01	4.1.20	SO_2 Emissions	The Martinsburg Plant operated and maintained an SO_2 scrubber on the Preheater/Precalciner kiln system during the reporting year as necessary to meet the SO_2 emission limits specified in Section 4.1.22.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Kiln 8 & 9	4.1.21	Kiln 7, 8 & 9 Ceasing Operations	Not applicable as Kilns 7, 8, and 9 permanently ceased operation in 2009.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.1.22	Kiln Emission Limits	Review of the 2017 emissions calculations determined that the Preheater/Precalciner kiln system was not in compliance with all emission limits stipulated in Section 4.1.22. The Preheater/Precalciner kiln system exceeded its 55.0 lb/MM ton clinker 30-day rolling Mercury limit on 4/4/17. The exceedance was reported as part of the PC MACT Summary report submitted on 7/27/17.	☐ Yes ☒ No ☐ N/A	1	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification
N/A	4.1.23	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU3	4.1.24	Emission Limits	Review of the Plant 2017 emissions calculations determined that all sources within Group EU3 were in compliance with their listed emission limits for the 2017 calendar year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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CD42.04	4.1.25	Low NO_x Burners and SNCR	The Martinsburg Plant operated and maintained low NO_x burners and a SNCR NOx control system on the Preheater/Precalciner kiln system during the 2017 reporting year as necessary to meet the NO_x emission limits specified in Section 4.1.22.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU5	4.1.26	Coal Handling Opacity Standard	Initial Performance Tests were conducted on all 40 CFR 60 Subpart Y sources from 3/26/10 to 4/6/10 and 9/20/10 for compliance with the 20% opacity standard.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU5	4.1.27	Coal Handling Dust Control Systems	All applicable coal preparation and handling equipment is equipped with fugitive dust control systems.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU5	4.1.28	Coal Handling Dust Control	All coal delivery roads at the Martinsburg Plant have been paved. Best management practices are employed for all handling and transfer of coal to minimize dust emissions.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.1.29	Emission Standard Circumvention	Review of records for the Martinsburg Plant shows that the Plant has not used any article, machine, equipment, or process to purposefully conceal an emission violation.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.1.30	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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CD42.04	4.1.31	Emission Variance	The Martinsburg Plant did not request an emission variance due to an unavoidable malfunction during the 2017 reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.1.32	Low NO_x Burners	The Martinsburg Plant previously installed low NO_x burners which were in use when the kiln operated from May 1 through September 30 of the reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.1.33	HCl Emission Limits	An HCl Stack Test was conducted on the Preheater/Precalciner kiln on 3/27/10 and 3/28/10. The stack test results documented that the Preheater/Precalciner kiln had an HCl emission rate of 1.48 mg/dscm (Raw Mill off) and 0.55 mg/dscm (Raw Mill on) which demonstrates compliance with the HCl limit of 210 mg/dscm.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.1.34	Sulfur Dioxide Limit	The Martinsburg Plant SO_2 CEMS documented no instances where the in-stack sulfur dioxide concentration 3-hour block average exceeded 2,000 ppmv during the 2017 reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.1.35	Sulfur Dioxide Averaging Time	Not Applicable - Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.1.36	Allowable Stack Emissions	Not Applicable - Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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N/A	4.1.37	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
N/A	4.1.38	Reserved	N/A	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU4	4.1.39	Emission Limits	Review of the Plant 2017 emissions calculations determined that all sources within Group EU4 were in compliance with their listed emission limits for the 2017 calendar year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU5	4.1.40	Emission Limits	Review of the Plant 2017 emissions calculations determined that all sources within Group EU5 were in compliance with their listed emission limits for the 2017 calendar year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.1.41	Good Air Pollution Control Practices	Review of operation records determined that the Martinsburg Plant, to the extent practicable, maintained and operated the Plant in a manner consistent with good air pollution control practices for minimizing emissions.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU5	4.1.42	Coal Handling Opacity Standard	Initial Performance Tests were conducted on all 40 CFR 60 Subpart Y sources from 3/26/10 to 4/6/10 and 9/20/10 which demonstrated compliance with the 20% opacity standard for all sources.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Group EU6	4.1.43	Emission Limits	Review of the Plant 2017 emissions calculations determined that all sources within Group EU6 were in compliance with their listed emission limits for the 2017 calendar year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Finish Mill 1 & 2 Air Heater	4.1.44	Finish Mill 1 & 2 Air Heater Emission Limits	Review of the Plant 2017 emissions calculations determined that the Finish Mill 1 & 2 Air Heater was in compliance with all listed emission limits for the 2017 calendar year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
N/A	4.1.45	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Finish Mill 1 & 2 Air Heater	4.1.46	Finish Mill Air Heater Fuel Usage	Review of operational records determined that the Finish Mill 1 & 2 Air Heater was in compliance with all listed fuel usage limits during the reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU7	4.1.47	Emission Limits	Review of the Plant 2017 emissions calculations determined that all sources within Group EU7 were in compliance with their listed emission limits for the 2017 calendar year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Rail Transloader	4.1.48	Diesel Fuel Usage	The Rail Transloader did not operate during the 2017 reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Rail Transloader	4.1.49	Emission Limits	The Rail Transloader did not operate during the 2017 reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Rail Transloader and EP37.15	4.1.50	40 CFR 60 Subpart IIII	The Plant maintains documentation demonstrating that the Rail Transloader internal combustion engine (ICE) complies with the emission standards for new ICEs under 40 CFR 60.4201(a). As of 12/31/17, the permitted mobile crushers have not begun operation.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Rail Transloader and EP37.15	4.1.51	40 CFR 60 Subpart IIII	The Plant maintains documentation demonstrating that the Rail Transloader internal combustion engine (ICE) complies with the emission standards for new ICEs under 40 CFR 60.4201(a). As of 12/31/17, the permitted mobile crushers have not begun operation.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Rail Transloader and EP37.15	4.1.52	40 CFR 60 Subpart IIII	The Rail Transloader did not operate during the 2017 reporting period. As of 12/31/17, the permitted mobile crushers have not begun operation.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Rail Transloader and EP37.15	4.1.53	40 CFR 60 Subpart IIII	The Rail Transloader did not operate during the 2017 reporting period. As of 12/31/17, the permitted mobile crushers have not begun operation.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Rail Transloader and EP37.15	4.1.54	40 CFR 60 Subpart IIII	The Rail Transloader internal combustion engine (ICE) was assembled and configured in accordance with the manufacturer's emission-related specifications. As of 12/31/17, the permitted mobile crushers have not begun operation.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Rail Transloader and EP37.15	4.1.55	40 CFR 60 Subpart IIII	The Rail Transloader did not operate during the 2017 reporting period. As of 12/31/17, the permitted mobile crushers have not begun operation.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU8	4.1.56	Emission Limits	Review of the Plant 2017 emissions calculations determined that all sources within Group EU8 were not in compliance with their listed emission limits for the reporting year. Emission Unit EP25.03 exceeded its individual emission limits. However, the Plant maintained compliance with the Group EU8 emission limit during the 2017 calendar year.	☐ Yes ☒ No ☐ N/A	1	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification
EP0B.01, EP0B.02	4.1.57	Compliance Date	The Initial Notice of Compliance for boilers EP0B.01 and EP0B.02 was submitted to WV DEP on 7/20/17.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
EP0B.01, EP0B.02	4.1.58	Initial and Periodic Tune-ups	Per the Initial Notice of Compliance for boilers EP0B.01 and EP0B.02 that was submitted to WV DEP on 7/20/17, the initial tune-up was completed on 4/4/17.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
EP0B.01, EP0B.02	4.1.59	One-Time Energy Assessment	Per the Initial Notice of Compliance for boilers EP0B.01 and EP0B.02 that was submitted to WV DEP on 7/20/17, a one-time energy assessment was completed by the Martinsburg Plant, as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
EP0B.01, EP0B.02	4.1.60	General Duty to Minimize Emissions	The Martinsburg Plant operated and maintained the boilers in a manner consistent with safety and good air pollution control practices for minimizing emissions.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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EP0B.01, EP0B.02	4.1.61	Opacity	No visible emissions were observed from the boilers during the 2017 calendar year	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU8	4.1.62	Opacity Compliance	No visible emissions were observed from the boilers during the 2017 calendar year. If visible emissions are observed, a Method 9 will be conducted to determine compliance with the 10% opacity limit.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
EP0G.01	4.1.63	Operation Requirements for Emergency Stationary RICE	Emergency engine use, other than for emergencies, maintenance, and testing, did not exceed 50 hours during the 2017 calendar year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
EP0G.01	4.1.64	Manufacturer's Certification	Copies of the manufacturer's certification for the emergency stationary CI ICE were provided in the Class II Administrative Update Application to WV DEP and are maintained by the Martinsburg Plant.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.2.1	Facility-Wide Requirements	Reference to Section 3.2 Facility-Wide Monitoring Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.2.2	Stack Gas Monitoring	Not Applicable - Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Group EU1, EU2	4.2.3	Quarry Crushing and Raw Material Preparation Monitoring	No additional monitoring requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU3	4.2.4	SO_2, NO_x, THC, CO CEMS Requirement	The Martinsburg Plant operates and maintains a SO_2, NO_x, THC, and CO CEMS on the Preheater/ Precalciner kiln. There were several brief periods during the reporting period when the CEMS malfunctioned and no data was recorded.	☐ Yes ☒ No ☐ N/A	See Semiannual Reports	☒ 1st Half (January 1st through June 30th) ☒ 2nd Half (July 1st through December 31st)
Group EU3	4.2.5	Clinker Transfer Records	No clinker was stored in outdoor clinker storage piles during the 2017 reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.2.6	NO_x Annual Performance Testing	The Martinsburg Plant Preheater/Precalciner kiln system operates a NO_x CEMS and is therefore not required to conduct annual NO_x performance testing.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.2.7	Sulfur Dioxide Testing Requirements	The Martinsburg Plant Preheater/Precalciner kiln system operates a SO_2 CEMS in order to demonstrate compliance with SO_2 limits. The Martinsburg Plant SO_2 CEMS documented no instances where the in-stack sulfur dioxide concentration 3-hour block average exceeded 2,000 ppmv during the reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Group EU4	4.2.8	Clinker Handling and Storage Monitoring	Weekly Method 22 visible emission observations are required to be conducted on all clinker handling and storage emission sources and retained on-site at the Plant. All weekly Method 22 visible emission observations for the 2017 were conducted except for the weeks of 2/19/17, 4/9/17, and 4/16/17.	☐ Yes ☒ No ☐ N/A	3	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification
Group EU5	4.2.9	Fuel Handling Monitoring	Reference to Section 3.2 Fuel Handling Monitoring Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU5	4.2.10	Coal Handling Performance Testing	No new coal handling emission sources began operation during the 2017 reporting period.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU6	4.2.11	Cement Production Monitoring	Reference to Section 3.2 Cement Production Monitoring Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU6	4.2.12	Finish Mill Opacity Monitoring	Finish Mills 1 and 2 are each equipped with a COMS in lieu of conducting the daily visible emission observations required by Condition 3.2.4. Per a review of COMS downtime records, the Finish Mill 1 and 2 COMS operated each day that Finish Mill 1 and 2 were operational during the 2017 calendar year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Group EU7	4.2.13	Shipping Monitoring	Reference to Section 3.2 Shipping Monitoring Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU7	4.2.14	Fuel Usage Recordkeeping	The Rail Transloader did not operate during the 2017 reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU8	4.2.15	Other Miscellaneous Source Monitoring	Reference to Section 3.2 Other Miscellaneous Source Monitoring Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.3.1	Facility-Wide Testing Requirements	Reference to Section 3.3 Facility-Wide Testing Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU1, EU2	4.3.2	Monthly Method 22 Visible Emissions	Monthly 10-minute Method 22 observations are required to be performed for all PC MACT affected sources. Monthly 10-minute visible emission testing was conducted and recorded as required for all PC MACT affected sources during the 2017 calendar year. However, there was one instance for one emission source in Group EU2 where the required 30-minute Method 9, which is required to be conducted within one hour of observing a visible emissions, was not conducted.	☐ Yes ☒ No ☐ N/A	1	☐ 1st Half (January 1st through June 30th) ☒ 2nd Half (July 1st through December 31st)

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Group EU1, EU2	4.3.3	Subpart OOO Opacity Testing	No new 40 CFR 60 Subpart OOO permitted fugitive emission sources began operation during the 2017 reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU1, EU2	4.3.4	Subpart OOO Stack Particulate and Opacity Testing	No new 40 CFR 60 Subpart OOO permitted emission sources equipped with a stack began operation during the 2017 reporting period.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
EU37.15	4.3.5	Stationary CI ICE Performance Testing	As of 12/31/17, the permitted mobile crushers have not yet begun operation.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.3.6	Sulfur Dioxide Rate Calculations	Not Applicable - The SO_2 CEMS was installed and calibrated prior to the Preheater/Precalciner kiln beginning normal operations.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.3.7	Sulfur Dioxide Testing Requirements	Not Applicable - Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.3.8	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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CD42.04	4.3.9	VOC, PM, and PM10 Stack Testing	The 5-year re-test for VOC, PM, and PM_{10}, was conducted on the Preheater/Precalciner kiln system from April 6-7, 2016. The results demonstrated that the Preheater/Precalciner kiln system emitted less than 50% of the TSP and PM_{10} lb/hr emission limits specified in Condition 4.1.22, and less than 90% of the VOC lb/hr limit. As a result, a re-test is only required to be performed every 3 years.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
N/A	4.3.10	Reserved	N/A	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.3.11	Condensable Particulate Testing	Initial Performance Testing including Condensable Particulate was conducted on the Preheater/Precalciner kiln system from 3/27/10 to 3/29/10.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU4	4.3.12	Monthly Method 22 VEs	Monthly 10-minute Method 22 observations are required to be performed for all PC MACT affected sources. Monthly 10-minute visible emission testing was conducted and recorded as required for all PC MACT affected sources during the 2017 calendar year. However, there was one instance for one emission source in Group EU4 where the required 30-minute Method 9, which is required to be conducted within one hour of observing a visible emissions, was not conducted.	☐ Yes ☒ No ☐ N/A	1	☒ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU5	4.3.13	Monthly Method 22 VEs	Monthly 10-minute Method 22 observations are required to be performed for all PC MACT affected sources. Monthly 10-minute visible emission testing was conducted and recorded as required for all PC MACT affected sources in Group EU5 during the 2017 calendar year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Group EU5	4.3.14	Coal Handling Opacity Testing	Initial Performance Tests were conducted on all 40 CFR 60 Subpart Y sources from 3/26/10 to 4/6/10 with the report submitted to WV DEP on 5/28/10.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU5	4.3.15	Coal Handling Method 9 Testing	Initial Performance Tests were conducted on all 40 CFR 60 Subpart Y sources from 3/26/10 to 4/6/10 with the report submitted to WV DEP on 5/28/10.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU6	4.3.16	Monthly Method 22 VEs	Monthly 10-minute Method 22 observations are required to be performed for all PC MACT affected sources. Monthly 10-minute visible emission testing was conducted and recorded as required for all PC MACT affected sources during the 2017 calendar year. However, there were four instances for emission sources in Group EU6 where the required 30-minute Method 9s, which are required to be conducted within one hour of observing a visible emissions, were not conducted.	☐ Yes ☒ No ☐ N/A	4	☒ 1st Half (January 1st through June 30th) ☒ 2nd Half (July 1st through December 31st)
Group EU7	4.3.17	Monthly Method 22 VEs	Monthly 10-minute Method 22 observations are required to be performed for all PC MACT affected sources. Monthly 10-minute visible emission testing was conducted and recorded as required for all PC MACT affected sources during the 2017 calendar year. However, there were eight instances for emission sources in Group EU7 where the required 30-minute Method 9s, which are required to be conducted within one hour of observing a visible emissions, were not conducted.	☐ Yes ☒ No ☐ N/A	8	☒ 1st Half (January 1st through June 30th) ☒ 2nd Half (July 1st through December 31st)

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Group EU8	4.3.18	Monthly Method 22 VEs	Monthly 10-minute Method 22 observations are required to be performed for all PC MACT affected sources. Monthly 10-minute visible emission testing was conducted and recorded as required for all PC MACT affected sources in Group EU8 during the 2017 calendar year.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.4.1	Facility-Wide Recordkeeping Requirements	Reference to Section 3.4 Facility-Wide Recordkeeping Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.4.2	Clinker Production Recordkeeping	The Martinsburg Plant keeps daily and monthly clinker production records as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.4.3	Monthly Operation Records	The Martinsburg Plant maintains monthly records of the hours of operation for all major processing operations.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU1, EU2	4.4.4	Quarry, Crushing, and Raw Material Preparation Recordkeeping	Reference to Section 3.4 Quarry, Crushing, and Raw Material Preparation Recordkeeping Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU1, EU2	4.4.5	Notification of Construction and Startup	A notice was submitted to the WV DEP on 9/15/09 reporting the date of startup for each applicable source. A letter dated 4/10/07 from the WV DEP established that the date of construction start-up was prior to December 2, 2005.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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For the reporting period beginning 01/ 01/ 2017 and ending 12/ 31/2017

Emission Unit ID	Condition Number of Permit Requirement	Term or Condition that is the Basis for Certification	Method or Means of Determining Compliance Status[1]	Was the source in compliance for the reporting period?	If no, how many deviations occurred during the reporting period?	If deviations occurred, indicate when deviations were reported?
Group EU3	4.4.6	Pyroprocessing Recordkeeping Requirements	Reference to Section 3.4 Pyroprocessing Recordkeeping Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.4.7	Kiln Recordkeeping	Copies of all Performance Test Reports are kept in the Environmental Manager's office. Daily production records are available in the Martinsburg Plant Shared Server Drive. All Kiln start-up, shutdown, and malfunctions are recorded in the Martinsburg Plant Reliability Folders located on the Shared Server Drive.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.4.8	SO_2 Monitoring Recordkeeping	The Martinsburg Plant maintains onsite a record of all SO_2 CEMS monitoring data as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.4.9	Fuel Recordkeeping	The SAP Database and Quality Control Manager's office contain all records of fuel quantity consumed and quality of fuel.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU4	4.4.10	Clinker Handling and Storage Recordkeeping Requirements	Reference to Section 3.4 Clinker Handling and Storage Recordkeeping Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU5	4.4.11	Fuel Handling Recordkeeping Requirements	Reference to Section 3.4 Fuel Handling Recordkeeping Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Group EU6	4.4.12	Cement Production Recordkeeping Requirements	Reference to Section 3.4 Cement Production Recordkeeping Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU7	4.4.13	Shipping Recordkeeping Requirements	Reference to Section 3.4 Shipping Recordkeeping Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU8	4.4.14	Miscellaneous Sources Recordkeeping Requirements	Reference to Section 3.4 Miscellaneous Sources Recordkeeping Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
EP0B.01, EP0B.02	4.4.15	Boiler Recordkeeping Requirements	All notifications and reports required for boilers are retained onsite in the Environmental Manager's Office.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
EP0B.01, EP0B.02	4.4.16	Boiler Recordkeeping Requirements	All records required by 40 CFR 63 Subpart DDDDD for the boilers are retained by the Martinsburg Plant, as required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Facility-Wide	4.5.1	Facility-Wide Reporting	Reference to Section 3.5 Facility-Wide Reporting Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Group EU1, EU2	4.5.2	Quarry, Crushing, and Raw Material Preparation Reporting	Reference to Section 3.5 Quarry, Crushing, and Raw Material Preparation Reporting Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU1, EU2	4.5.3	Subpart OOO Performance Test Reporting	Results of Initial Performance Tests conducted on 9/8-10/10 demonstrating that all sources equipped with a stack and subject to 40 CFR 60 Subpart OOO were in compliance with applicable particulate and opacity standards were submitted to WV DEP on 11/5/10. Results of Initial Method 9 Performance Tests that were conducted from 3/26/10 to 4/6/10 demonstrating that all fugitive sources subject to 40 CFR 60 Subpart OOO were in compliance with applicable opacity standards were submitted to WV DEP on 5/28/10.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU3	4.5.4	Pyroprocessing Reporting	Reference to Section 3.5 Pyroprocessing Reporting Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
CD42.04	4.5.5	NO_x Reporting	The annual NO_x Report documenting emissions from the Preheater/Precalciner kiln system from May 1 through September 30 of the reporting year was submitted to the WV DEP on 11/8/17, which was after the required WV DEP due date of 10/31/17.	☐ Yes ☒ No ☐ N/A	1	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st) ☒ 2017 Annual Compliance Certification
CD42.04	4.5.6	45 CSR 10 Monitoring Plan Exception Reports	No excursions outside the range of the emission limits established in the approved 45 CSR 10 Monitoring Plan were recorded during the reporting period, so no excursion reporting was required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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Group EU4	4.5.7	Clinker Handling and Storage Reporting Requirements	Reference to Section 3.5 Clinker Handling and Storage Reporting Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU5	4.5.8	Fuel Handling Reporting Requirements	Reference to Section 3.5 Fuel Handling Reporting Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU5	4.5.9	Initial Performance Testing	Initial Performance Tests were conducted on all 40 CFR 60 Subpart Y sources from 3/26/10 to 4/6/10 with the report submitted to WV DEP on 5/28/10.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU6	4.5.10	Cement Production Reporting Requirements	Reference to Section 3.5 Cement Production Reporting Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU7	4.5.11	Shipping Reporting Requirements	Reference to Section 3.5 Shipping Reporting Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU8	4.5.12	Miscellaneous Sources Reporting Requirements	Reference to Section 3.4 Miscellaneous Sources Reporting Requirements.	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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EP0B.01, EP0B.02	4.5.13	Boiler Reporting Requirements	No deviations from the work practice standards applicable to the boilers occurred during the 2017 reporting year; therefore, no deviation reporting was required.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
EP0B.01, EP0B.02	4.5.14	Boiler Compliance Reporting Requirements	A Compliance Report for the boilers is required to be submitted to WV DEP every five years. A compliance report was last submitted on 7/20/17.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
EU0G.01	4.5.15	Emergency Generator Reporting Requirements	Initial notification that the emergency stationary RICE was subject to 40 CFR 63 Subpart ZZZZ, was submitted to WV DEP on 6/26/17. This notification included an explanation that the emergency generator operates exclusively as an emergency stationary RICE with a rating of more than 500 HP at a major source of HAP emissions, and is therefore not subject to any emission limitations under this subpart.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU1	4.5.16	Limestone Delivery Recordkeeping	Daily and monthly records of the quantity of limestone diverted to the finish mills through pile EP37.06 were not maintained by the Plant as required for the 2017 reporting year.	☐ Yes ☒ No ☐ N/A	1	☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)
Group EU 1	4.5.17	Initial Notification and Recordkeeping for ICE (mobile crushers)	As of 12/31/17, the permitted mobile crushers have not yet begun operation.	☒ Yes ☐ No ☐ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

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N/A	4.6.1	Compliance Plan	Not Applicable - Informational Term or Condition	☐ Yes ☐ No ☒ N/A		☐ 1st Half (January 1st through June 30th) ☐ 2nd Half (July 1st through December 31st)

[1]Include any other information reasonably available or otherwise known relating to the status of compliance.