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AGCW–SEATTLE

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington, 98101-2038
Fax 206-343-7522

Registration No. 11339 Case No. _____

COMPLIANCE STATUS REPORT

Date of Report 7-21, 19 95 at 9:35a.m.

Source Name	Responsible Person, Title
Ash Grove Cement Company	Gerald Brown, Safety/Env. Mgr 623-5596

Location
3801 E. Marginal Wy S
Seattle, WA 98134

☐ No violations of PSAPCA's regulations were observed at the time of my inspection, with respect to the areas of the facility I inspected.

☑ During my inspection I noted the following deficiencies:

• Need an operations and maintenance (O+M) plan and need to upgrade O+M logs to show compliance with Reg I Section 5.05(e) for registered equipment

Please submit a written report within ten (10) working days describing the necessary corrective action you have taken or propose to take, including a schedule, to address the above deficiencies.

Issued by M McAfee

Received by _____
Signing this is not an admission of guilt

Form No. 70-182 (7/1/93)

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June

ASH GROVE CEMENT COMPANY
SEATTLE PLANT
OPERATION AND MAINTENANCE PLAN

(1) PERIODIC INSPECTION OF ALL EQUIPMENT AND CONTROL EQUIPMENT

Dust Collectors

The Dust Collector Specialist is dedicated to dust collector inspection, PM and repair. This individual is a member of the Preventive Maintenance Team of the Maintenance Department. Routine inspections including observations for visual emissions are scheduled monthly by the Maintenance Coordinator.

a. All dust collectors will be inspected by the D/C specialist at least once per month. This includes the kiln baghouse finish mill sweep and separator dust collectors and the coal mill dust collectors.

b. Inspections will include as a minimum the following items:

   1. External Inspection will be done with the dust collector operating to include a check for visible emissions, pressure readings, compartment and hopper panels and seams, door components, coatings, dampers, cleaning system components, tipping/feeder valve components, fan components, duct work and instrumentation.

   2. Internal Inspection Internal inspections will be done with the dust collector locked out of service to include bags, cages, bag clamps, thimbles, venturis, tubesheets, tensioning components, baffling, ground straps, blowpipes, traveller components, shaker components, hose components, compartment and hopper panels, coatings, and seams.

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c. Emissions related deficiencies noted during inspections will be reported immediately using the plant work order system and assigned a top priority.

d. Repairs necessary to reduce excessive emissions will be scheduled in accordance with section 3.

CEMS

The CEMS is inspected and maintained as necessary by the Instrumentation/Electrical Team of the Maintenance Department.

(2) MONITORING AND RECORDING OF EQUIPMENT AND CONTROL EQUIPMENT

Automatic calibrated checks are made daily on the main stack monitors(CEMS) for CO, SO2, NOx, opacity, flow rates and oxygen levels. A Relative Accuracy Test Audit (RATA) is conducted during one quarter of each year and a Compressed Gas Audit (CGA) is done during each of the remaining three calendar quarters. Copies of the yearly RATA is provided to PSAPCA. The CGA results are included on the CEM Monthly Summary report.

(3) PROMPT REPAIR OF ANY DEFECTIVE EQUIPMENT OR CONTROL EQUIPMENT

a. Investigation into the cause of an emission will begin immediately.

b. Repairs will begin when the cause is found.

c. Work orders generated for plant dust collectors are entered into the Equipment Maintenance Management Administration (EMMA) computerized system. All

deficiencies affecting the ability of the dust collector to maintain permitted dust emission levels will be assigned top repair priority.

d. Repairs will be completed prior to reuse of the malfuncting dust collector.

e. A follow up inspection of the repaired dust collector will be completed immediately after restart of the system to verify repairs are affected.

(4) PROCEDURES FOR START UP, SHUT DOWN AND NORMAL OPERATION

Appendix A
Kiln Start Up/Shutdown
and Maintenance Procedures

Appendix A - page 1

KILN STARTUP - PREHEATING

1. Start main baghouse.
2. Follow the 24 hour preheating schedule as shown on the attached graph for increasing kiln temperature, decreasing oxygen and for kiln rotation.
3. Adjust the ID fan damper and speed to increase stage 5 temperature approximately 60 degrees F per hour (following the preheating schedule) as fuel is increased.
4. Adjust ID fan damper and speed to slowly decrease kiln feed end oxygen per preheat graph.

KILN STARTUP - FEED ADDITION

1. When kiln is prepared for feed as per the preheating schedule, start kiln main drive on .9 revolutions per minute (RPM)
2. After kiln is on main drive, start kiln feed at 75 tons per hour.
3. When the feed enters the preheater at stage 1, increase ID fan and fuel to maintain 2% oxygen at kiln feed end and 1500 degrees F stage 5 exit temperature.
4. Add sorbent, when necessary to control sulfur dioxide emissions to below permit level.
5. As permitted by the quality of the material produced, increase feed rate and adjust the draft and the fuel accordingly to achieve 160 tons per hour production.
6. Estimated startup time: 0 - 48 hours depending on kiln preheating.

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KILN SHUT DOWN

1. Stop feed, shut off fuel and reduce draft.

   a. For emergency shut downs, retain as much heat as possible in the kiln to ease restart after the cause is corrected.

2. The kiln is rotated per the schedule:

0 - 1 Hours	Continuous turns
1 - 3 Hours	5 minute turns
3 - 8 Hours	10 minute turns
8 - 16 Hours	12 minute turns
16 - 24 Hours	30 minute turns

   All turns are to be made on auxiliary drive and should be approximately 100 degrees.

3. Open the preheater damper 5% every hour beginning 2 hours after the fire is taken off the kiln. If the temperature at the 5th stage exit is decreasing faster than 60 degrees F per hour, reduce opening percentage accordingly.

4. If a critical position is made or heavy rains begin, kiln should be rotated continuously until either clears.

5. The main bag house will remain in operation.

6. 24 hours is required for cool down before entry is made into the kiln.

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MAIN BAGHOUSE MAINTENANCE PROCEDURES

Monitoring Performance

1. Main Baghouse temperatures and pressures are continuously monitored by the control room while performance is checked by an opacity monitor on the kiln stack.
2. Conditions of the baghouse components are inspected routinely to prevent failures occurring during operation.

Trouble shooting

1. Efforts to repair deficiencies will begin immediately upon detection.
2. Once a problem is identified and located, individual cell(s) containing the defective equipment can be isolated for repairs without shutting down the entire baghouse.
3. Bag House inlet and blow back dampers are closed and secured to isolate the cell(s) containing the problem.
4. Cell(s) doors are opened and the cell is allowed to cool for safe entry.
5. Once the repairs are completed, the cell(s) is returned to operation.

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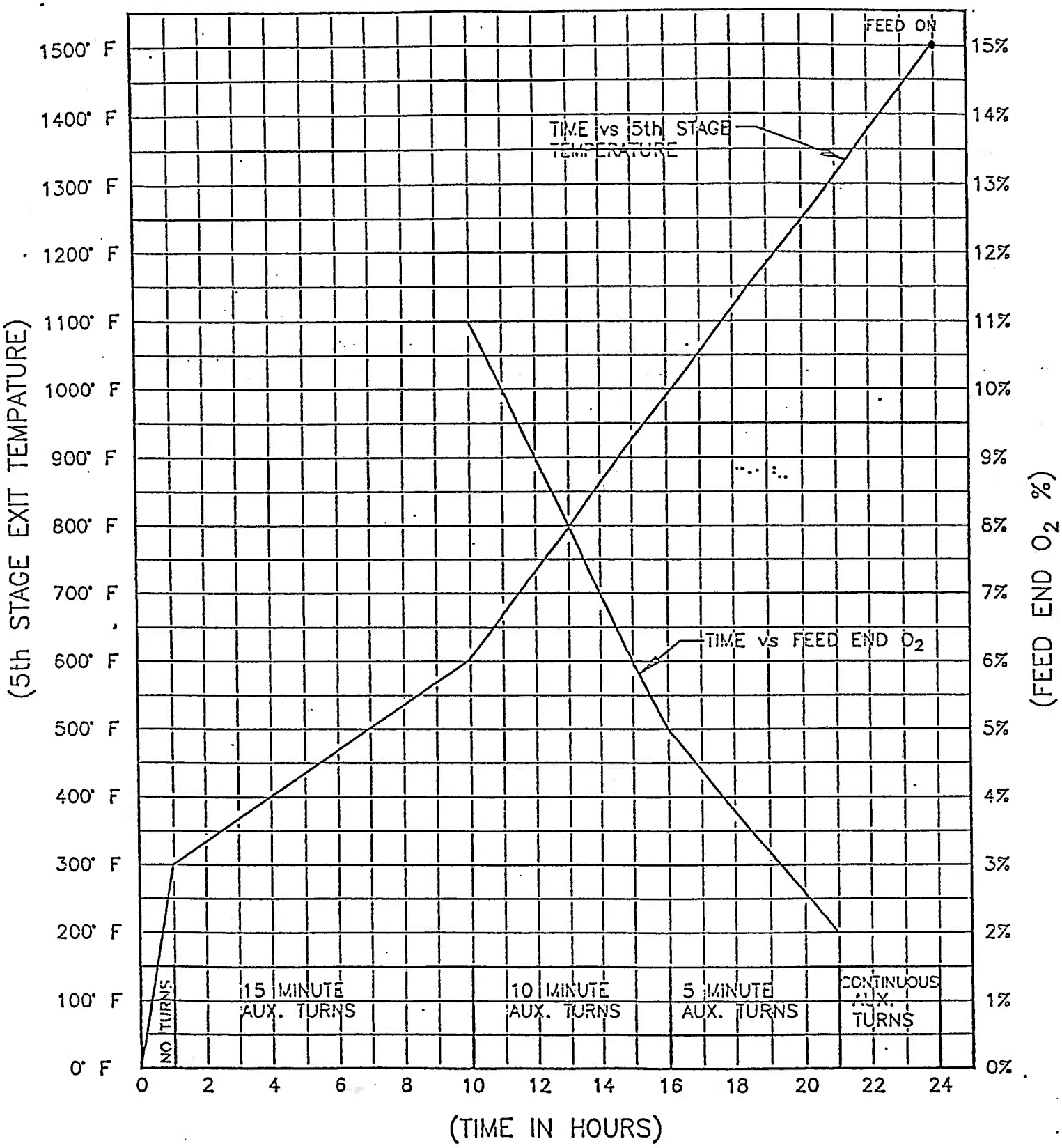
Appendix A



KILN PREHEATING SCHEDULE

(5) CONTROL MEASURES TO BE EMPLOYED TO ASSURE COMPLIANCE WITH SECTION 9.15 OF REGULATION I

Stock Piles

Water sprays are used as necessary to control fugitive emissions. The spray system is checked for operation prior to receiving raw material by the Marine Supervisor of the Production Department.

Road Maintenance

A water truck for washing roads along with road sweepers are operated as needed to control fugitive emissions from plant vehicle traffic. The Building and Grounds Team of the Production Department normally operates this equipment and schedules needed maintenance as indicated by the pre-operation check list performed by the operator.

Conyeror Systems

Where used to prevent carry back to control fugitive emissions, the "Air Knife" will operate automatically when the belt is running. To insure proper operation , the motor current for the air knife is checked at least monthly. Bi-monthly examinations will be conducted by maintenance to check nozzle air pressure and inspect the air knife for defects.

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(6) A RECORD OF ALL ACTIONS REQUIRED BY THE PLAN

Stack Monitors CEMS

a. Record of the CEMS calibration checks are stored along with flow rates on the Data Acquisition System (DAS).

b. Records of maintenance or repairs to the Certified Emission Monitors are kept in the CEMS log.

Dust collectors

Dust collector records will be kept by the maintenance Coordinator or his designee.

a. Inspection results maintenance recorded in the Dust Collector Log along with a Fact Sheet to include equipment number, location, manuf, type, ser #, size, cleaning method, application, material handled, pressure range (before and after cleaning), bag count, bag type (construction, material, finish, etc), bag size, cage style, tensioning method, spares location, spares minimum stock levels

b. Repairs to include date reported, date repaired, and repairs accomplished. All records will be maintained for three years from date of last entry.

c. Records of whether or not visual emission were detected will be made during routine inspections.

Road maintenance

These inspection and maintenance records are kept by the Production Department B&G Supervisor.

a. The dates of water truck operation are recorded by the operator in the equipment log book.

b. Maintenance inspections of the water truck and the sweeper are recorded on the operators pre-operation check record.

Stock pile water sprays

a. Records of the water sprays checks are kept by the Marine Supervisor of the Production Department.

b. Maintenance records are kept on the Equipment Maintenance Management Administration (EMMA) computerized system.

Converor Systems

a. "Air Knife" maintenance records are kept on the Equipment Maintenance Management Administration (EMMA) computerized system.