Puget Sound Clean Air Agency

Working Together For Clean Air

www.pscleanair.org

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May 28, 2004

Ash Grove Cement Co.
c/o Craig Puljan Plant Manager
3801 E Marginal Wy S
Seattle WA 98134

Re: Ash Grove Cement Co. (R11339)
Disposition of Notice of Violation No. 3-001697

Dear Mr. Puljan:

Based on the information provided in your Corrective Action letter dated April 1, 2004, and provided that Ash Grove incorporates the revised start-up procedures into the cement kiln Operations and Maintenance plan, this Agency considers the above-referenced matter closed. This agency will take no further enforcement action in this case.

Thank you for your action to ensure compliance with Agency regulations and for joining with the Agency in efforts to achieve cleaner air.

Sincerely,

Elizabeth Gilpin
Inspector

EMG/mll
cc: Mario Miller, Supervising Inspector

50% recycled fiber | 30% post-consumer waste
Pub. No. 30-7 | Revised 02-14-2002

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AGCS2M000847

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General Notice of Violation

No. 3-001697

Case No. | Registration No. 11339 | Violation Date: **9/30/03** Time:

Certified Mail No.: 7001 2510 0000 2003 3457	Name **Ash Grove Cement Co.**		Responsible Person, Title **Craig Puljan, Plant Manager**
Location of Violation (Address) **3801 E. Marginal Way So**	City **Seattle**, WA	Zip **98134**	County **King**
Mailing Address **As Above**	City, State **Seattle, WA**	Zip **98134**	Phone **(206) 623-5596**

Violation of Regulation I, Section 9.03(a) (2)

- ☐ 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ 6.03 Failure to obtain Notice of Construction approval prior to construction, installation, establishment, or modification of a source.
- ☐ 9.11(a) Emission of air contaminant in quantities, characteristics, and duration, so as to be injurious or interfere with enjoyment of life/property.
- ☐ 9.15 Emission of fugitive dust without using reasonable precautions.
- ☐ 9.20 Failure to operate and maintain equipment in good working order.
- ☒ 9.03(a) (2) Unlawful to cause or allow the emission of any air contaminant for a period or periods greater than 3 minutes in any one hour, which is greater than 20% opacity.

Facts Alleged to Constitute a Violation

This Agency issued a Compliance Status Report for more information to Ash Grove on September 3rd 2003. The Agency requested that Ash Grove conduct Method 9A readings for at least 20 minutes from the kiln cowling end and the feed end of the cement kiln during the next phase I kiln start up. Phase I startup is the period of time before feed is introduced into the kiln. Ash Grove submitted a letter to the Agency dated 2/18/04 in response the September 3rd 2003 CSR. Method 9 readings taken on 9/30/03 of the kiln cowling end of the kiln showed opacity readings greater than 20% opacity for 3 minutes within a one hour period.

Corrective Action Order *You must take the corrective action described below*

☒ **Within 10 days of the date you receive this Notice of Violation, submit a written report describing the action you have taken to correct this violation and achieve compliance with Agency regulations.**

☐ By: , you must

Issued by: Elizabeth Gilpin — *Elizabeth Gilpin, Inspector, 689-4026* Date/Time: 3/15/04

Received by _____ *signature* _____ *print name*

Signing this document is not an admission of guilt

Form No. 70-129 (11/02) LSS

"WESTERN REGION"

April 1, 2004

Ms. Elizabeth Gilpin
Puget Sound Clean Air Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Re: Notice of Violation No. 3-001697

Dear Ms. Gilpin:

NOV No. 3-001697 alleges that Regulation I, Section 9.03 (a)(2) was violated during a Phase I Startup of the kiln (Period before feed is introduced into the kiln). You have requested a report describing actions Ash Grove has taken to correct the violation.

Kiln preheating is the thermal conditioning of the kiln system and occurs prior to feed being added to the kiln system. Heat-up of the kiln is controlled at a rate consistent with good operating practices and proper conditioning of the whole kiln system. Thermal conditioning, or preheating, of the kiln system is performed using only natural gas as fuel. Normal preheating of the cold kiln system will follow a standard 18 to 24 hour preheat guideline. The actual duration of the preheat is determined by the residual temperature in the system. The warmer the kiln, the shorter will be the length of preheat and so on. On occasion, an extended preheat is necessary for curing new refractory.

Thermal conditioning of the kiln is accomplished using minimal airflow through the system. The low airflow is to assure that the heat remains in the kiln and is not drawn up into the preheat tower. Temperatures are raised at a prescribed rate to allow surfaces to heat up evenly in order to avoid damage to metal surfaces and the internal refractory. Visible emissions occur during preheat when dust laden gas escapes back through the cooler tubes and out its discharge shroud. These visible emissions typically occur only during the planned kiln rotation cycle that is part of the preheat schedule. Once the kiln start-up temperature is reached the airflow is increased to accommodate the incoming raw feed and the emissions cease.

Ash Grove is carefully evaluating its kiln startup procedures. The most direct means of eliminating these emissions is to increase the draft through the kiln during startup. The reason this was not done before is because of the potential for thermal damage to the kiln as heat is transferred from the kiln to the preheat tower, extending the duration of the preheat phase because the kiln is not hot enough to receive kiln feed, decreased productivity, and increased fuel cost because hot gas is being vented out the stack rather then heating up the system. Ash Grove has been experimenting with various operating scenarios during this startup phase to minimize visible emissions from the cooler tube discharge. One such scenario is to open the I.D. fan

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