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 SEMI-ANNUAL MONITORING REPORT

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 07 / 01 / 2017 and ending 12 / 31 /2017	
Based upon the specific test methods, monitoring, record keeping 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 that 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 Semi-Annual Monitoring Report.	
☒ Form B - Semi-Annual Monitoring Report[3]	☒ Form C - Deviation Report[3]

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.

3 Submit signed electronic copy by e-mail to: DEPAirQualityReports@wv.gov

Form B - Semi-Annual Monitoring Report

Permittee: **Error! Reference source not found.**	Facility: **Error! Reference source not found.** Martinsburg Plant	Permit Number: R30-00300006-2017
For the reporting period beginning 07/ 01/ 2017 and ending 12/ 31/2017		

Emission Unit ID	Monitoring, Data, or Analysis Required by the Permit	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
EU2, EU3, EU4, EU5, EU6, EU7, EU8	Permit Term 3.2.1 - O&M Plan must be developed, include the information listed in Permit Terms 3.2.1(1) through 3.2.1(4), and submitted to the WV DEP as part of the Part 70 permit application.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
EU2 (EP42.04), EU6	Permit Term 3.2.2 – Finish Mill 1 and 2 COMs shall be calibrated, maintained, and continuously operated as required during the reporting period.	☒ Yes ☐ No	1/25/18 – PC MACT Semiannual Summary Report Attachment ID:
EU2 (EP42.04), EU6	Permit Term 3.2.4 - Daily 6-minute Method 22 visible emission monitoring shall be conducted on all raw mill and finish mill sources to demonstrate compliance with their 10% opacity limit. [NOTE: Raw mill is part of the kiln system and monitored by the kiln system PM CPMS.]	☒ Yes ☐ No	1/25/18 – PC MACT Semiannual Summary Report Attachment ID:
EU2 (EP42.04), EU6	Permit Term 3.2.4(1-2) - A second Method 22 must be conducted within 24 hours if visible emissions are observed during daily monitoring. If visible emissions are observed during the second Method 22, a 30-minute Method 9 observation must be conducted.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
EU2 (EP42.04), EU6	Permit Term 3.2.4(Corrective Actions) - Corrective actions must be initiated within one hour if visible emissions are observed during daily monitoring.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
EP42.04	Permit Term 3.2.5(1- 5) - Thermocouples shall be calibrated, maintained and operated as required during the reporting period. The thermocouple temperatures must be monitored and continuously recorded and 3-hour rolling averages must be calculated to demonstrate compliance with temperature limits. Thermocouples must be calibrated at least once every three months.	☒ Yes ☐ No	1/25/18 – PC MACT Semiannual Summary Report Attachment ID:

All sources must complete this section. Use the table above to summarize all required monitoring, data, or analyses for the 6-month period. In the first column, list the emission units upon which the monitoring was performed. Use any Emission Unit ID's assigned in the permit, if no ID's in permit, generally describe. In the second column, describe the monitoring, data, or analysis and cross-reference the relevant permit term. In the third column indicate whether a separate monitoring report is required. Lastly, complete the fourth column only if you are required to submit a separate monitoring report. If submitted previously, indicate the date you submitted it; if submitted for the first time as an attachment to this form, assign an attachment identification (ID), mark the attachment with that ID, and attach the separate monitoring report to this form.

Form B - Semi-Annual Monitoring Report

Permittee: **Error! Reference source not found.**	Facility: **Error! Reference source not found.** Martinsburg Plant	Permit Number: R30-00300006-2017
For the reporting period beginning 07/ 01/ 2017 and ending 12/ 31/2017		

Emission Unit ID	Monitoring, Data, or Analysis Required by the Permit	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
EU2, EU3, EU4, EU6, EU7	Permit Term 3.2.7 - All sources subject to an opacity limit under Permit Term 3.1.20 shall monitor opacity as specified in the O&M Plan.	☒ Yes ☐ No	1/25/18 – PC MACT Semiannual Summary Report Attachment ID:
EU2, EU3, EU4, EU6, EU7	Permit Term 3.2.7(1) – Monthly 10 minute visible emission testing shall be conducted on all affected sources.	☒ Yes ☐ No	1/25/18 – PC MACT Semiannual Summary Report Attachment ID:
EU2 (EP42.04), EU6	Permit Term 3.2.7(2) - Daily 6-minute Method 22 visible emission monitoring shall be conducted on all raw mill and finish mill sources. [NOTE: Raw mill is part of the kiln system and monitored by the kiln system PM CPMS.]	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
EU3, EU4, EU6, EU7	Permit Term 3.2.9 (1-6) – Approval of alternate monitoring requirements.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
EU2 (EP42.04), EU6	Permit Term 3.2.10 Raw Mill and Finish Mill Opacity Monitoring Alternatives. The Martinsburg Plant operates a PM CPMS for the inline raw mill (as part of the kiln system) and COMS for Finish Mill 1 and Finish Mill 2 to demonstrate compliance with their 10% opacity limit.	☒ Yes ☐ No	1/25/18 – PC MACT Semiannual Summary Report Attachment ID:
Facility-Wide	Permit Term 3.2.12 - Visible emission observations must be conducted weekly on all fugitive particulate emission activities to determine compliance with opacity limit.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
Facility-Wide	Permit Term 3.2.13 - Visible emission observations must be conducted weekly on all dust collectors and documentation must be maintained on all dust collector pressure drop observations.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:

All sources must complete this section. Use the table above to summarize all required monitoring, data, or analyses for the 6-month period. In the first column, list the emission units upon which the monitoring was performed. Use any Emission Unit ID's assigned in the permit, if no ID's in permit, generally describe. In the second column, describe the monitoring, data, or analysis and cross-reference the relevant permit term. In the third column indicate whether a separate monitoring report is required. Lastly, complete the fourth column only if you are required to submit a separate monitoring report. If submitted previously, indicate the date you submitted it; if submitted for the first time as an attachment to this form, assign an attachment identification (ID), mark the attachment with that ID, and attach the separate monitoring report to this form.

Form B - Semi-Annual Monitoring Report

Permittee: **Error! Reference source not found.**	Facility: **Error! Reference source not found.** Martinsburg Plant	Permit Number: R30-00300006-2017
For the reporting period beginning 07/ 01/ 2017 and ending 12/ 31/2017		

Emission Unit ID	Monitoring, Data, or Analysis Required by the Permit	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
Facility-Wide	Permit Term 3.2.14 - Daily records must be kept of all dust suppression used. Weekly dust control system inspections must be done from May 1 through Sept. 30 and monthly from Oct. 1 through April 30. Records must be kept of all maintenance, and must state whether any maintenance/corrective action was taken as a result of the weekly/monthly inspections and the times that the dust control systems were inoperable and any corrective actions taken.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
Facility-Wide	Permit Term 3.2.15 – Development of a Site Specific Monitoring Plan for all emission limits which the Plant demonstrates compliance with through performance stack testing or emission monitoring per 40 CFR 63.1350(p).	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
Facility-Wide	Permit Term 3.2.16 – A Continuous Emission Rate Monitoring System must be installed, operated, calibrated, and maintained for PM, THC (or OHAPS), HCl (or SO2), and Mercury to demonstrate compliance with applicable emission limits.	☒ Yes ☐ No	1/25/18 – PC MACT Semiannual Summary Report Attachment ID:
Facility-Wide	Permit Term 3.2.17 – Parameter monitoring requirements for the operation and maintenance of each continuous parameter monitoring system.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
EP42.04	Permit Term 4.2.2 - WVDEP can require monitoring devices to be installed to demonstrate SO_2 compliance with 45CSR10-8.2.a. The Plant currently operates a CEMS to demonstrate compliance with the 2000 ppmv limit.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
EP42.04	Permit Term 4.2.4 – A CEMS shall be installed, operated, and maintained to measure emissions of SO_2, NO_x, THC and CO from the kiln system stack.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:

All sources must complete this section. Use the table above to summarize all required monitoring, data, or analyses for the 6-month period. In the first column, list the emission units upon which the monitoring was performed. Use any Emission Unit ID's assigned in the permit, if no ID's in permit, generally describe. In the second column, describe the monitoring, data, or analysis and cross-reference the relevant permit term. In the third column indicate whether a separate monitoring report is required. Lastly, complete the fourth column only if you are required to submit a separate monitoring report. If submitted previously, indicate the date you submitted it; if submitted for the first time as an attachment to this form, assign an attachment identification (ID), mark the attachment with that ID, and attach the separate monitoring report to this form.

Form B - Semi-Annual Monitoring Report

Permittee: **Error! Reference source not found.**	Facility: **Error! Reference source not found.** Martinsburg Plant	Permit Number: R30-00300006-2017
For the reporting period beginning 07/ 01/ 2017 and ending 12/ 31/2017		

Emission Unit ID	Monitoring, Data, or Analysis Required by the Permit	Separate Monitoring Report?	Date of Separate Report Submittal or Attachment ID
Facility-Wide	Permit Term 4.2.5 – Daily and monthly records are required to be maintained of the quantity of clinker transferred to the outdoor clinker storage pile.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
EP42.04	Permit Term 4.2.6 – The owner/ operator of any kiln subject to 45 CSR 40-100 must complete annual NOx testing if a NOx CEMS is not used.	☒ Yes ☐ No	11/8/17 – Annual NOx Report Attachment ID:
EP42.04	Permit Term 4.2.7 – The owner/operator of a combustion source shall demonstrate compliance with 45CSR10-3, 4, and 5 by monitoring according to one of the methods specified in Term 4.2.7. The Plant uses a CEMS to monitor compliance with the 2000 ppmv SO_2 limit.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
EU4	Permit Term 4.2.8 – Weekly visible emission observations shall be conducted on the clinker handling and storage emission sources.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
EU5	Permit Term 4.2.10 – An initial performance test in accordance with Reference Method 9 of Appendix A of 40CFR60 shall be conducted to demonstrate compliance with opacity standards for all new sources subject to 40 CFR 60 Subpart Y.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:
EU6	Permit Term 4.2.12 - Alternate Monitoring Provisions – The requirements to conduct daily Method 22 testing shall not apply to any raw mill or finish mill equipped with a COMS or BLDS. Finish Mill 1 and Finish Mill 2 both have COMS installed, maintained, calibrated, and operated to demonstrate their compliance with their 10 % opacity limit.	☒ Yes ☐ No	1/25/18 – PC MACT Semiannual Summary Report Attachment ID:
Transloader	Permit Term 4.2.14 – The Permittee shall maintain monthly records of the amount of fuel used by the rail transloader engine.	☐ Yes ☒ No	MM / DD / YYYY Attachment ID:

All sources must complete this section. Use the table above to summarize all required monitoring, data, or analyses for the 6-month period. In the first column, list the emission units upon which the monitoring was performed. Use any Emission Unit ID's assigned in the permit, if no ID's in permit, generally describe. In the second column, describe the monitoring, data, or analysis and cross-reference the relevant permit term. In the third column indicate whether a separate monitoring report is required. Lastly, complete the fourth column only if you are required to submit a separate monitoring report. If submitted previously, indicate the date you submitted it; if submitted for the first time as an attachment to this form, assign an attachment identification (ID), mark the attachment with that ID, and attach the separate monitoring report to this form.

Form C – Deviation Report[1]

Permittee: **Error! Reference source not found.**	Facility: **Error! Reference source not found.** Martinsburg Plant	Permit Number: R30-00300006-2017

For the reporting period beginning 07/ 01/ 2017 and ending 12/ 31/2017

Emission Unit ID	Condition Number of Permit Requirement	Term or Condition that is the Basis for Certification	What was the deviation[2] from the Term or Condition?	What was the cause for the deviation[2] And what type of corrective measures were taken?	Deviation Time Period Date (mo/day/yr) Time (hr:min)
EU2 (EP42.04), EU6	Permit Term 3.2.2	Finish Mills are required to demonstrate compliance with their 10% opacity limit. Finish Mill 1 and 2 utilize COMS to demonstrate compliance with this limit on a 6-minute block average basis.	The Finish Mill 1 COMS recorded one six-minute period on 11/28/17 where Finish Mill 1 exceeded its 10% opacity limit.	As documented in the PC MACT Summary Report submitted on 1/25/18.	As documented in the PC MACT Summary Report submitted on 1/25/18.
EP42.04	Permit Term 3.2.5(1-5)	The thermocouple temperatures must be monitored and continuously recorded and 3-hour rolling averages must be calculated to demonstrate compliance with temperature limits. Thermocouples must be re-calibrated once every three months.	The Kiln Bypass Baghouse thermocouple recorded 3-hour rolling averages which were greater than the temperature limits set during the most recent Dioxin/Furan Stack Test. In addition, the thermocouples were not re-calibrated during the last quarter of 2017.	As documented in the PC MACT Summary Report submitted on 1/25/18.	As documented in the PC MACT Summary Report submitted on 1/25/18.
Facility-Wide	Permit Term 3.2.7(1)	Monthly 10 minute visible emission testing shall be conducted on all affected sources. If visible emissions are observed than a 30-minute method 9 is required to be conducted within one hour.	The required follow-up 30-minute method 9 tests were not completed when visible emissions were overserved during Monthly Method 22 visible emission observations on three occasions.	Training has been conducted on required monitoring and record retention policies.	Date (# of emission units for which a visible emission was observed): July 2017 (2 emission units) August 2017 (5 emission units) October 2017 (2 emission units)

[1]If there are no deviations to report for this period, place "None" in the first row on the form.
[2]A deviation is defined as any period when the permittee failed to meet the terms or conditions of their permit. A deviation is not necessarily a violation. Violations will be determined by DAQ and/or EPA.

Form C – Deviation Report[1]

Permittee: **Error! Reference source not found.**	Facility: **Error! Reference source not found.** Martinsburg Plant	Permit Number: R30-00300006-2017

For the reporting period beginning 07/ 01/ 2017 and ending 12/ 31/2017

Emission Unit ID	Condition Number of Permit Requirement	Term or Condition that is the Basis for Certification	What was the deviation[2] from the Term or Condition?	What was the cause for the deviation[2] And what type of corrective measures were taken?	Deviation Time Period Date (mo/day/yr) Time (hr:min)
EP42.04	Permit Term 3.2.16	A Continuous Emission Rate Monitoring System must be installed, operated, calibrated, and maintained for PM, THC (or OHAPS), HCl (or SO_2), and Mercury to demonstrate compliance with applicable emission limits.	The continuous emission monitoring systems for PM and Mercy experienced downtime during the reporting period and were not continuously operated. (Note: The THC and SO_2 CEMS also experienced downtime and are documented under Permit Term 4.2.4).	Deviations were due to CEMS/CPMS malfunctions. In each incidence, every effort was taken by the maintenance and electrical departments to bring the CEMS/CPMS back up to normal operation as quickly as possible.	PM CPMS: 07/22/17 16:00 to 07/22/17 17:59 07/24/17 18:00 to 07/25/17 06:59 12/28/17 11:00 to 12/28/17 11:59 Mercury CEMS: 07/16/17 23:00 to 07/16/17 23:59 07/22/17 16:00 to 07/22/17 17:59 07/24/17 18:00 to 07/25/17 06:59 08/08/17 16:00 to 08/08/17 17:59 08/16/17 09:00 to 08/16/17 11:59 10/13/17 16:00 to 10/13/17 16:59 11/01/17 04:00 to 11/01/17 04:59 12/06/17 08:00 to 12/06/17 08:59 12/07/17 08:00 to 12/07/17 08:59 12/07/17 14:00 to 12/07/17 14:59 12/08/17 08:00 to 12/08/17 08:59 12/09/17 08:00 to 12/09/17 08:59 12/11/17 08:00 to 12/11/17 08:59 12/12/17 08:00 to 12/12/17 08:59 12/14/17 08:00 to 12/14/17 08:59 12/14/17 14:00 to 12/14/17 14:59 12/15/17 08:00 to 12/15/17 08:59 12/16/17 08:00 to 12/16/17 08:59 12/17/17 08:00 to 12/17/17 08:59 12/18/17 08:00 to 12/18/17 08:59 12/19/17 08:00 to 12/19/17 08:59 12/20/17 08:00 to 12/20/17 08:59 12/21/17 08:00 to 12/21/17 08:59 12/21/17 14:00 to 12/21/17 14:59 12/22/17 08:00 to 12/22/17 08:59 12/23/17 08:00 to 12/23/17 08:59 12/24/17 08:00 to 12/24/17 08:59 12/28/17 11:00 to 12/28/17 11:59 12/30/17 09:00 to 12/30/17 09:59
EP42.04	Permit Term 4.2.4	The SO_2, NO_x, THC, and CO CEMS must be continuously operated.	CEMS records indicate several periods during the reporting period when the SO_2, NO_x, and CO CEMS malfunctioned and no data was recorded or the data was recorded as invalid.	Deviations were due to CEMS malfunctions. In each incidence, every effort was taken by the maintenance and electrical departments to bring the CEMS back up to normal operation as quickly as possible.	07/22/17 16:00 to 07/22/17 17:59 07/24/17 18:00 to 07/25/17 06:59 08/03/17 06:00 to 08/03/17 06:59 08/15/17 10:00 to 08/15/17 12:59 08/25/17 06:00 to 08/25/17 08:59 08/25/17 12:00 to 08/25/17 13:59 08/26/17 06:00 to 08/26/17 11:59 10/27/17 06:00 to 10/27/17 06:59 10/29/17 06:00 to 10/27/17 06:59 11/29/17 09:00 to 11/29/17 11:59 11/29/17 13:00 to 11/29/17 13:59 12/28/17 11:00 to 12/28/17 11:59

[1]If there are no deviations to report for this period, place "None" in the first row on the form.
[2]A deviation is defined as any period when the permittee failed to meet the terms or conditions of their permit. A deviation is not necessarily a violation. Violations will be determined by DAQ and/or EPA.