



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Kimberly S.L. Bauman, PhD
Director of Environmental Affairs
Mississippi Lime
16147 U.S. Highway 61
Ste. Genevieve, Missouri 63670

RE: Part 63, National Emission Standards for Hazardous Air Pollutants for Lime
Manufacturing Plants, Subpart AAAAA

Alternative Monitoring Request

Dear Ms. Bauman:

This letter is in response to Mississippi Lime's October 2, 2020, Alternative Monitoring Request, pursuant to the Code of Federal Regulations at 40 CFR § 63.8 (b)(1)(i), submitted to the United States Environmental Protection Agency's Region 7 office. In the request, Mississippi Lime seeks the EPA's approval of the use of a single Continuous Opacity Monitor System to be used to demonstrate compliance for the following emissions units located at 16147 US Highway 61, Ste. Genevieve, Missouri (FRS ID 110030914367):

EU-2550 SS Vertical Kiln No. 1 (EP-380)
EU-2720 SS Vertical Kiln No. 2 (EP-424)
EU-2730 SS Vertical Kiln No. 3 (EP-425)

Regulatory Requirements

40 CFR §63.7083(e)(1) states for an affected source that "commenced construction or reconstruction on or before September, 16, 2019, then the compliance date for the revised requirements promulgated at §§63.7090, 63.7100, 63.7112, 63.7113, 63.7121, 63.7130, 63.7131, 63.7132, 63.7140, 63.7141, 63.7142, and 63.7143 and Tables 2, 3, 4, 5, 7, 8 and 9 (except changes to the cross references to 63.6(f)(1) and (h)(1)) of 40 CFR 63, subpart AAAAA, published on July 24, 2020 is January 20, 2021." Furthermore, 40 CFR §63.7090(c) states: "On or after the relevant compliance date for your source as specified in §§63.7083(e), you must meet each startup and shutdown period emission limit in Table 2 to this subpart that applies to you."

40 CFR §63.7100(a) states: "Prior to the relevant compliance date for your source as specified in §63.7083(e), you must be in compliance with the emission limitations (including operating limits) in this subpart at all times, except during periods of startup, shutdown, and malfunction. On and after the relevant compliance date for your source as specified in §63.7083(e), you must be in compliance with the applicable emission limitations (including operating limits) at all times."



40 CFR §63.7113(a) states: “You must install, operate, and maintain each continuous parameter monitoring system according to your OM&M plan required by §63.7100(d) and paragraphs (a)(1) through (5) of this section, and you must install, operate, and maintain each continuous opacity monitoring system as required by paragraph (g) of this section.”

(g) For each COMS used to monitor an add-on air pollution control device, you must meet the requirements in paragraphs (g)(1) and (2) of this section.

(1) Install the COMS at the outlet of the control device.

(2) Install, maintain, calibrate, and operate the COMS as required by 40 CFR part 63, subpart A, General Provisions and according to Performance Specification -1 of appendix B to part 60 of this chapter. Facilities that operate COMS installed on or before February 6, 2001, may continue to meet the requirements in effect at the time of COMS installation unless specifically required to re-certify the COMS by their permitting authority.”

TABLE 2 TO SUBPART AAAAA OF PART 63—STARTUP AND SHUTDOWN EMISSION LIMITS FOR KILNS AND COOLERS

For. . .	You must meet the following emission limit	You have demonstrated compliance, if after following the requirements in §63.7112 . . .
1. All new and existing lime kilns and their associated coolers equipped with an FF or an ESP during each startup	Emissions must not exceed 15 percent opacity (based on startup period block average)	i. Installed, maintained, calibrated and operated a COMS as required by 40 CFR part 63, subpart A, General Provisions and according to PS-1 of appendix B to part 60 of this chapter, except as specified in §63.7113(g)(2);
		ii. Collected the COMS data at a frequency of at least once every 15 seconds, determining block averages for each startup period and demonstrating for each startup block period the average opacity does not exceed 15 percent.

Thus, based on the requirements above from 40 CFR Part 63, subpart AAAAA, Mississippi Lime would need to install COMS on the outlet of each control device for the three kilns mentioned above for start-up, shutdown and malfunction on or before January 20, 2021.

Mississippi Lime Proposal

As stated in its October 2, 2020, Alternative Monitoring Request, Mississippi Lime has three vertical kilns currently equipped with baghouses and bag leak detection systems that are ducted to a common stack. They claim that due to the short runs of ductwork associated with these kilns, the congested superstructure surrounding the kilns, and the requirements of PS-1 they are unable to install COMS for each kiln between the exit of the baghouse and the entrance of the common stack. Mississippi Lime proposes to install a single COMS (Teledyne Lighthawk 560 opacity monitor) in the common stack to monitor opacity from EU-2550, EU- 2720, and EU-2730 in order to meet the requirements of PS-1. Mississippi Lime acknowledges that with the installation of a COMS in the common stack the facility will be required to meet the compliance requirements for opacity as noted in Table 2 to Subpart AAAAA- Startup and Shutdown Emissions Limits for Kilns and Coolers.


EPA Response

The EPA recognizes the unique situation at Mississippi Lime which does not facilitate the installation of a COMS as required in 40 CFR Part 63, subpart AAAAA. Based on the information provided, the EPA has determined that the alternative monitoring location Mississippi Lime has proposed does not compromise the integrity of the requirements in 40 CFR Part 63, subpart AAAAA. The use of a single COMS unit on the common stack will require the opacity limit of 15% to be met at all times as required in Table 2 of 40 CFR Part 63, subpart AAAAA, regardless of the number of units operating.

For the reasons stated above, the EPA approves Mississippi Lime’s Alternative Monitoring Request to use the single COMS unit in the common stack as proposed.

For further information regarding this matter, please contact Joe Terriquez, in the Air Branch, Enforcement and Compliance Assurance Division, at (913) 551-7105.

Sincerely,

TRACEY CASBURN  Digitally signed by
TRACEY CASBURN
Date: 2021.01.11
14:43:58 -06'00'

Tracey Casburn
Acting Branch Chief
Enforcement and Compliance Assurance Division

cc: Richard Swartz, MDNR