



PUGET SOUND
Clean Air Agency

Puget Sound Clean Air Agency

Notice of
Construction No.

12003

HEREBY ISSUES AN ORDER OF APPROVAL
TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 11339

Date

DEC 05 2025

Operation of One AGC-Seattle Whole Tire Feed System for injecting whole tires as replacement fuel at the Calciner level of the Preheater Tower above the Kiln, which is controlled by an existing Baghouse. This Order does not authorize any physical changes to the existing Whole Tire Feed System.

OWNER

INSTALLATION ADDRESS

Ash Grove Cement Company
3801 E Marginal Way S
Seattle, WA 98134

Ash Grove Cement Company
3801 E Marginal Way S
Seattle, WA 98134-1113

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
3. Ash Grove shall measure and record, each calendar day, the total weight of whole tires injected as non-hazardous secondary material fuel as defined by 40 CFR 241.4(a)(1).
4. Ash Grove shall submit a Fuel Monitoring Plan for injection of whole tires within 60 days after this approval. The plan shall contain the method for complying with condition 3, the replacement fuel composition (i.e., Btu content, percent ash, etc.), and the maximum rate of whole tires that will be used. The rate established in this submitted plan will become the new allowable maximum TDF firing percentage and will be the tire injection rate required during the testing for conditions 5, 7 and 9.
5. Within 60 days after the submittal of the updated fuel monitoring plan, Ash Grove shall complete a study to determine if this operational change results in an increase in the emission rate of metallic TAPs listed in WAC 173-460-150. The metals to be tested include arsenic, beryllium, cadmium, chromium, lead, manganese, nickel, and selenium. Ash Grove shall submit a test plan that includes fuel rates for each condition. Tests will be in accordance with EPA Method 29, and the methodology for determining if there is an increase in emissions of a pollutant will be in accordance with Appendix C to 40 CFR Part 60. Based on the results of this test, one of the following two conditions shall take effect:
 - a. If the study shows that modification does not lead to an increase in emissions of any tested TAP, the maximum rate of whole tires that will be used as defined in the Fuel Monitoring Plan required in condition 4 shall replace the previously established permitted tire consumption rate.
 - b. If the study shows that this modification results in an increase in the emission rate to the atmosphere of any TAP, then the previous established rate 30% TDF by weight, daily average limit shall remain in place.

A limit of 30% TDF by weight, daily average limit shall remain in effect until the results of this study are

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reported, except for the days needed to conduct this study. During the days of this study, the TDF limit shall be defined in the fuel monitoring plan required by condition 4.

6. Ash Grove shall submit an Emission Monitoring Plan within 60 days after this approval. The plan shall contain the following elements:
 - a. Measurement methods, analytical procedure and testing dates for demonstrating compliance with the requirements of 40 CFR 63.1343(b)(1).
 - b. The measurement methods shall include a combination of Continuous Emission Rate Monitoring Systems, Continuous Emission Monitoring Systems and source tests to show compliance with 40 CFR 60 subpart F and 40 CFR 63 Subpart LLL.
7. Within 60 days after the submittal of the updated fuel monitoring plan, Ash Grove shall conduct source tests to demonstrate compliance with the following previously established emission limits:
 - a. Kiln exhaust shall not exceed 0.30 lb of particulate per ton of feed (dry basis) except during SSM periods.
 - b. Kiln exhaust shall not exceed 0.07 lb of particulate per ton of clinker except during SSM periods, per 40 CFR 63.1343(b)(1)
 - c. Ash Grove shall not cause to be discharged into the atmosphere from the kiln exhaust Dioxin/Furan (D/F) exceeding 0.20 ng/dscm (TEQ) @ 7% O₂. If the average temperature at the inlet to the baghouse during the D/F performance test is 400°F or less, this limit is changed to 0.40 ng/dscm (TEQ).

Ash Grove shall conduct the tests at the maximum rate of whole tire injection specified in condition 4. These source tests shall use EPA Method 5 or EPA method 201 A (particulate) and EPA method 23 (dioxins/ furans). Ash Grove shall submit a report of the test results within 60 days of testing.

8. Ash Grove shall report any deviation from the fuel monitoring plan that represent a potential threat to human health or safety as soon as possible but no later than 12 hours after such a deviation is discovered. Ash Grove shall report other deviations in writing to Puget Sound Clean Air Agency Operating Permit Certification no later than 30 days after the end of the month during which the deviation is discovered.
9. Within 60 days after the submittal of the updated fuel monitoring plan, Ash Grove shall conduct stack testing for hydrogen chloride per EPA Method 26 or 26A in accordance with PSCAA Regulation I 3.07. Ash Grove shall conduct the tests at the maximum rate of whole tire injection specified in condition 4 and shall use the tests to calculate a facility-specific emissions factor for HCl, in units of pounds of HCl per ton of clinker. The tests shall include three runs under raw-mill-up conditions, and three runs under raw-mill-down conditions.
10. This order of approval supersedes and cancels Order of Approval No. 5755, dated March 30, 1995.

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APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.



Carl Slimp
Reviewing Engineer



John Dawson
Engineering Manager