



MEMORANDUM

DATE: October 18, 2018

TO: Missouri Air Conservation Commission

FROM: Carol S. Comer, Director *Initials on File*
Missouri Department of Natural Resources

SUBJECT: Variance Request – Buzzi Unicem - Festus COMS
10 CSR 10-6.220 “*Restriction of Emission of Visible Air Contaminants*”

On July 26, 2018, the Missouri Department of Natural Resources’ Air Pollution Control Program received a request from Buzzi for a variance from the monitoring requirements specified in Missouri Air Conservation Commission regulation 10 CSR 10-6.220, “*Restriction of Emissions of Visible Air Contaminants*,” hereinafter referred to as “the rule.” The current version of this rule requires Portland cement calcining kiln operations to install a continuous opacity monitoring system (COMS) to monitor the opacity of visible emissions. A proposed amendment to the rule is currently in process that would remove the COMS requirement for this facility. The variance would allow Buzzi flexibility for the monitoring of visible emissions in the event their COMS fails before the proposed rule amendment comes into effect.

Emissions from the preheater/precalciner kiln – clinker cooler system, identified as emission unit EU4-K-09 in the operating permit, are currently subject to the monitoring requirements specified in subsection (3)(F) of the rule, which requires one of the following:

- The installation, calibration, and maintenance of a COMS. The COMS is to be certified per the requirements of Federal Regulation 40 CFR Part 60, Appendix B.
- or
- The installation, calibration, and maintenance of an alternative continuous monitoring system that is approved by the staff director, EPA, and incorporated into the SIP.

Buzzi currently employs a COMS to demonstrate compliance with these monitoring requirements. Specifically, Buzzi uses a Thermo Fisher Scientific opacity monitor (model No. 440-ALB). In their variance request Buzzi indicates that Thermo Scientific no longer supports the 440 for maintenance or spare parts, and no other company sells spare parts. Buzzi further indicates that the last of the spare parts for the unit were used in June 2018.

The Department is in the process of amending the rule. The amended rule removes the COMS requirement for this facility, as the COMS requirement has become redundant. This and similar cement kilns are subject to strict particulate matter limits in MACT-LLL, which prevent them from reaching an in-stack opacity close to the opacity limits of the rule. They also monitor operations using a continuous parametric monitoring system per the requirements of MACT-LLL. If the commission approves the amended rule, it is scheduled to come into effect during the early months of 2019.

Buzzi plans to continue operation of the COMS; however, if it fails they may not be able to repair it and continue operations. If the COMS fails prior to the amended rule coming into effect, Buzzi requests the option of monitoring the opacity of visible emissions from the preheater/precalciner kiln – clinker cooler system using EPA Method 22 and, if necessary, EPA Method 9 during the interim period until the amended rule comes into effect. Buzzi personnel would conduct 6-minute Method 22 observations daily, and if visible emissions are observed then conduct 30-minute Method 9 observations. Records of the monitoring would be recorded and retained for five years.

Upon certain conditions, the Commission may grant a variance, pursuant to state law Sections 643.055 and 643.110, RSMo. The Department has reviewed each of these conditions and the facts of this situation. Section 643.055.2, RSMo, authorizes the Commission to grant a variance if the person applying for the variance can show that compliance with the rule, among other things, is impractical or of insignificant value under the existing conditions, Section 643.055.2(4), RSMo. The Department believes this variance request meets the conditions of Section 643.055.2(4) because, in the event the COMS fails, compliance with the monitoring requirements as specified in the rule is impractical or of insignificant value.

The Department recommends granting the variance.

CSC:cwc