

# Fact Sheet



## *For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act*

This Fact Sheet serves to address the changes specific to this Minor Modification and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on March 14, 2023.

Permit Number: **R30-00300006-2023**

Application Received: **August 16, 2024**

Plant Identification Number: **03-54-003-00006**

Permittee: **Argos USA LLC**

Facility Name: **Martinsburg Plant**

Mailing Address: **1826 South Queen Street, Martinsburg, WV 25401**

Permit Action Number: *MM02*      Revised: *April 25, 2025*

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Physical Location:	Martinsburg, Berkeley County, West Virginia
UTM Coordinates:	243.50 km Easting • 4369.00 km Northing • Zone 18
Directions:	Take south Queen Street Exit off WV State Route 45 at Martinsburg. The facility is 0.5 miles south to the end of Queen Street.

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### **Facility Description**

Argos USA LLC owns and operates a cement manufacturing plant, which is characterized by SIC Code 3241. The plant operates a preheater/precalciner (PH/PC) kiln system that uses primarily coal and petcoke. The PH/PC kiln produces cement clinker, an intermediary product of cement, which is then ground into finished cement. The nominal capacity of the plant is 2,212,890 short tons (stons) per year of clinker. Argos uses approximately 292,110 stons of coal annually and fly ash from electric power plants. Argos also has the ability to burn petroleum hydrocarbon contaminated soils that were generated onsite in the PH/PC cement kiln. The facility has the potential to operate twenty-four (24) hours a day, seven (7) days per week, and fifty-two (52) weeks per year.

## Emissions Summary

This modification results in a decrease in the following emissions:

Plantwide Emissions Changes [Tons per Year]		
Regulated Pollutants	Potential Emissions	New PTE
Particulate Matter (PM <sub>2.5</sub> )	-1.75	222.74
Particulate Matter (PM <sub>10</sub> )	-4.94	587.09
Total Particulate Matter (TSP)	-5.84	938.67

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 4,464.54 tpy of CO; 4,041.69 tpy of NO<sub>x</sub>; 587.09 tpy of PM<sub>10</sub>; 4,517.63 tpy of SO<sub>2</sub>; 159.88 tpy of VOC; 28.78 tpy of Acetaldehyde; 14.93 tpy of Formaldehyde; 21.17 tpy of Hydrochloric Acid; 13.20 tpy of Naphthalene; 21.15 tpy of Xylenes and 127.47 tpy of aggregate HAPs. Due to this facility's potential to emit 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs, Argos USA LLC 's Martinsburg Plant is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

### Federal and State:

45CSR7	To Prevent and Control Particulate Matter Air Pollution from Manufacturing Processes and Associated Operations
45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
45CSR30	Requirements For Operating Permits

### State Only:

N/A

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

The active permits/consent orders affected by this modification are as follows:

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R14-0026R	February 20, 2025	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table," which may be downloaded from DAQ's website.

## Determinations and Justifications

The revisions made in association with this minor modification incorporate the revisions made in R14-0026R Class I Administrative Update Permit to replace the existing pneumatic cement transport system at the Martinsburg facility which includes the replacement of six baghouses, the decommissioning of one baghouse and the addition of 11 baghouses. Several changes have also been made to the boilerplate of the permit which are not associated with the R14-0026R changes. Revisions to the Title V permit include the following:

*Note: COA means citation of authority in the following discussion.*

### 1) Title V Boilerplate changes.

- Condition 3.1.6. – Revised the COA to the current version of the WV Code.
- Condition 3.3.1. – Revised the COA to the current version of the WV Code.
- Condition 3.3.1.b. – Added “If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit shall be revised in accordance with 45CSR§30-6.4 or 45CSR§30-6.5 as applicable.”

### 2) Section 1.1. - Emission Units Table

- Added the modified year of 2024 for the emission points EP21.05, EP21.06, EP21.07, EP21.08, EP22.05, and EP22.06. Also revised the descriptions for emission points EP22.05 and EP22.06.
- Revised the design capacities and added the modified year of 2024 for the six baghouses CD21.05, CD21.06, CD21.07, CD21.08, CD22.05, and CD22.06. Also revised the descriptions for baghouses CD22.05 and CD22.06.
- Removed EP21.09 and its associated baghouse CD21.09.
- Added 11 emission points EP22.10 and EP45.17 through EP45.26 and their associated baghouses CD22.10 and CD45.17 through CD45.26.

### 3) Section 1.2. - Active R13, R14, and R19 Permits Table - Updated R14-0026Q to R14-0026R and updated the date of issue.

### 4) Section 4.0.

- Condition 4.1.2. – Revised the PM, PM<sub>10</sub> and PM<sub>2.5</sub> allowable emissions.
- Condition 4.1.40.

- Removed CD21.09
- Added CD22.10 and CD45.17 through CD45.26.
- Removed the ‘Existing or New’ column since these designations have been removed from R14-0026R and are unnecessary.
- Revised the Group 7 TSP and PM<sub>10</sub> limits.

### **Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

None.

### **Request for Variances or Alternatives**

None.

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date:	Not Applicable for minor modifications.
Ending Date:	N/A

### **Point of Contact**

All written comments should be addressed to the following individual and office:

Frederick Tipane  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
304/414-1910  
frederick.tipane@wv.gov

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Response to Comments (Statement of Basis)**

Not applicable.