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ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM:

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DATE: October 17, 1977

SUBJECT: Application of PSD Review to a Portland Cement  
Manufacturing Operation, Texas Industries, Inc.

FROM: Director, Division of Stationary Source Enforcement

TO: Eloy R. Lozano, Director  
Air and Hazardous Materials Division

This is in response to your memo dated September 14, 1977, concerning Texas Industries' proposed plans to construct portland cement manufacturing facilities.

We concur with your evaluation that both operations qualify as portland cement plants and, that they will be subject to the review for the prevention of significant deterioration (PSD). The PSD applicability will require both facilities to apply best available control technology for all facilities emitting particulate matter and/or sulfur dioxide. It will also require that separate ambient air quality analyses be performed at each site for particulate matter and sulfur dioxide, if applicable.

If you have any questions or comments, please contact Rich Biondi (755-2564) of my staff.

Edward E. Reich

cc: Dick Rhoads - CPDD  
Mike Trutna - CPDD

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: September 14, 1977

SUBJECT: Application of PSD Review to a Portland Cement  
Manufacturing Operation, Texas Industries, Inc.

FROM: Eloy R. Lozano, Director  
Air and Hazardous Materials Division

TO: Ed Reich, Director  
Division of Stationary Source Enforcement

As indicated in the attached submittal of August 30, 1977, Texas Industries, Inc. plans to construct portland cement manufacturing facilities. The proposed operations are unique in that a cement clinker producing facility will be constructed near Hunter, Texas, and a finish grinding facility will be constructed near Clodine, Texas. The clinker will be shipped by rail from Hunter to Clodine where finish cement will be prepared.

We have determined that Prevention of Significant Deterioration (PSD) review applies. The issue is how to apply PSD review in this instance. It would seem reasonable to apply best available control technology requirements to both facilities. It would then follow that two air quality analyses should be performed.

We would appreciate receiving your comments on this issue by September 30, 1977. If you have difficulty responding by that time, please call me at FTS 749-3837.

Attachment

cc: 6AEPP