



# Technical Support Document

## COMAR 26.11.09.08 & 26.11.30.01-08 Portland Cement - Opacity

### Purpose

The purpose of this action is to:

1. Combine all of the existing requirements in COMAR 26.11.01, .06, and .29 regarding NO<sub>x</sub>, SO<sub>x</sub>, visible emissions and particulate matter that apply to Portland cement manufacturing plants into one chapter; and
2. Repeal NO<sub>x</sub> RACT requirements in COMAR 26.11.09.08 which apply to Portland cement manufacturing plants, as the NO<sub>x</sub> requirements in COMAR 26.11.29, established under the EPA NO<sub>x</sub> SIP Call, constitute RACT for Portland cement kilns.

This action will be submitted to the U.S. Environmental Protection Agency (EPA) for approval as part of Maryland's State Implementation Plan.

### Background

Although Portland cement plants burn fuel in the cement kiln, the kilns are not considered fuel burning equipment as defined in COMAR 26.11.01 and are therefore subject to different NO<sub>x</sub> and SO<sub>x</sub> emission standards. The existing COMAR 26.11.06.05 establishes a concentration standard for SO<sub>x</sub> depending on the location of the plant and the date the plant was constructed. The existing COMAR 26.11.29 contains NO<sub>x</sub> emission standards and monitoring requirements for Portland cement plants. These requirements for SO<sub>x</sub> and NO<sub>x</sub> are being moved into this new chapter. The visibility emission standards established in COMAR 26.11.06.02 are being mirrored in this new chapter, and the continuous opacity monitoring requirements in COMAR 26.11.01.10 are incorporated by reference. The new chapter will also include specific particulate matter requirements that are already in place for confined sources in COMAR 26.11.06.03.

One of the Portland cement plants in Maryland has replaced its existing plant with a new more efficient plant with added capacity. This facility is subject to different and more restrictive requirements established in the permit to construct issued by the Department.

This action will be submitted to the U.S. Environmental Protection Agency (EPA) for approval as part of Maryland's State Implementation Plan.

### Sources Affected and Location

There are two existing Portland cement manufacturing plants in Maryland. The larger plant has a pre-calciner kiln and is located in Carroll County. The smaller plant has a long-dry kiln and is located in Washington County.



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## **Requirements**

The main purpose of this action is to combine existing requirements for cement plants into a single chapter.

## **Expected Emissions Reductions**

There are no expected emission reductions from this action.

## **Economic Impact on Affected Sources and the Department**

The proposed action has no economic impact.