Table 1 – New Emission and Monitoring Requirements under Proposed Revision to NESHAP for Portland Cement Plants

Pollutant and Source	New Facilities	Existing Facilities	Monitoring and Comments
Mercury Kilns and In-line kilns & raw mills	14 lbs/MMt Clinker 30 day rolling average	43 lbs/MMt Clinker 30 day rolling average	CEMS or Sorbent Trap Monitors and 40 CFR part 60 Appendix F Procedure 5 – Quality Assurance Requirements for Vapor Phase Mercury Continuous Monitoring Systems Used at Stationary Sources for Compliance Determination. No limits on fly ash with increased mercury. No requirement to remove dust from system.
Total Hydrocarbons (THC) or Organic Hazardous Air Pollutants (HAPs) Kilns and in-line kilns & raw mills and raw material dryers	6 ppmvd as propane @7% O2 Or as alternative: 1 ppmvd total organic HAPs @7% O2 determined by stack test using FTIR (Reference Method 320) every 5 years along with THC CEMS to set a site specific THC limit All 30 day rolling average	7 ppmvd as propane @7% O2 Or as alternative: 2 ppmvd organic HAPs @7% O2 determined by stack test every 5 years along with THC CEMS to set a site specific THC limit	THC CEMS in accordance with Specification 12A—Specifications and Test Procedures For Total Vapor Phase Mercury Continuous Emission Monitoring Systems in Stationary Sources And if using organic HAPS – stack test every 5 years. Total organic HAP means, for the purposes of this subpart, the sum of the concentrations of compounds of formaldehyde, benzene, toluene, styrene, m-xylene, p-xylene, o-xylene, acetaldehyde, and naphthalene as measured by EPA Test Method 320 of appendix A
Particulate Matter (PM) Kiln and Cooler	0.080 lb/ton clinker kiln and cooler Can adjust for combined gas flow for combined stacks	0.085 lb/ton clinker kiln and cooler Can adjust for combined gas flow for combined stacks	Bag Leak Detectors for bag houses and Method 5 stack test every 5 years. ESP Predictive Model to monitor ESP performance and a stack test every 5 years. As an alternative – PM CEMS For new and reconstructed Raw Material Dryers, Raw Mills and Finish Mills: Longer Method and potentially Method 9 visible emissions monitoring.
Hydrochloric Acid	0.1 ppmvd @7% O2 30 day rolling average	2.0 ppmvd @7% O2 30 day rolling average	CEMS And if there is an in-line raw mill must conduct a Method 321 stack test for mill-on and mill-off operating condition every 5 years. No CEMS if one has a caustic scrubber, but need to monitor scrubber parameters and conduct Method 321 stack test every 5 years. Stack gas concentration is below the analytical detection limit of the method. Hence no detection is only method of compliance.