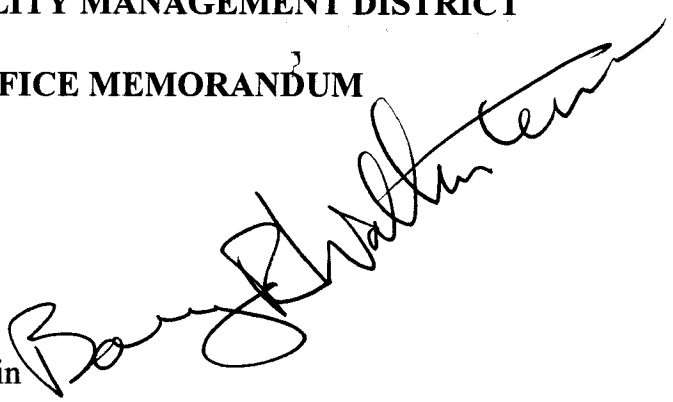


SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

EXECUTIVE OFFICE MEMORANDUM

DATE: May 9, 2008

TO: Interested Parties

FROM: Barry R. Wallerstein 

SUBJECT: Additional Notices of Violation Issued to TXI Riverside Cement
Related to RECLAIM, Title V and Permits Violations


Earlier this week, AQMD staff issued additional Notices of Violations to TXI Riverside Cement, related to RECLAIM, Title V and permits violations. Please see the attached memorandum of Mohsen Nazemi, Deputy Executive Officer of Engineering & Compliance, for details related to these violations of AQMD regulations. Also, please note that these violations are not related to hexavalent chromium or dust.

BRW/drw

Attachments

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING & COMPLIANCE**

MEMORANDUM

DATE: May 8, 2008
TO: Barry Wallerstein, D. Env., Executive Officer
FROM: Mohsen Nazemi, P.E. Deputy Executive Officer 
SUBJECT: Issuance of Notice of Violation to TXI/Riverside Cement Company

Based on our review of reports provided by TXI/Riverside Cement Company, located at 1500 Rubidoux Blvd., Riverside, we have determined that TXI/Riverside Cement Company has operated in violations of AQMD RECLAIM (Regulation XX), Title V (Regulation XXX) and Permits (Regulation II). Therefore, yesterday our staff issued the following Notice of Violation to TXI/Riverside Cement Company:

Notice of Violation # P47996 for violating the following rules on multiple days beginning in 2005:

- ◆ 2004(b)(1)
Late submittal of quarterly certified emission reports beyond the end of the reconciliation period (30 days) of each quarter.
- ◆ 2004(b)(4)
Late submittal of Annual Permit Emission Program (APEP) Report beyond 60 days after the end of a compliance year
- ◆ 2011(c)(4)(C)(ii)
Failure to calculate and report SO_x emissions based on permitted super-compliant concentration limit.
- ◆ 2004(b)(2) and 2004(d)(4)
Filing inaccurate emissions by not calculating SO_x emissions as required by Regulation XX and the Facility Permit
- ◆ 2012(c)(2)(A)
Failure to have an operating direct monitoring device to continuously monitor NO_x emissions.
- ◆ 2009.1(f)(3)
Exceeding NO_x emission limit imposed under an approved compliance plan.
- ◆ 2004(f)(1), 203(b) and 3002 (c)(1)
Exceeding NO_x emission limit imposed under Facility Permit and Title V Permit.

These violations were detected by Engineering and Compliance staff during RECLAIM and Title V audit of reports submitted by TXI/Riverside Cement Company.

My staff is continuing to evaluate and review additional information and records to determine whether TXI/Riverside Cement is operating in compliance with all applicable air quality rules and regulations. Please let me know if you have any questions or need additional information. Thanks.