

April 17, 2012



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

Ms. Deborah Jordan
Director, Air Division
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is issuing the renewal Major Facility Review Permit for the following facility.

ALAMEDA COUNTY
Tom Bates
Scott Haggerty
Jennifer Hosterman
Nate Miley
(Secretary)

Application Number	Facility Number	Facility Name	Address, City	Type of Operation
17947	A0017	Lehigh Southwest Cement Co.	24001 Stevens Creek Blvd Cupertino, CA 95014	Cement Manufacturing

CONTRA COSTA COUNTY
John Gioia
(Chairperson)
David Hudson
Mary Piepho
Mark Ross

On February 16, 2012, the District submitted the proposed Title V renewal permit and the District responses to comments submitted during the first and second public comment periods to EPA for their 45-day review period. The EPA review period ended on March 31, 2012 and EPA submitted three comments. In response to comment #1, the District has incorporated the NESHAP requirements listed below into the Title V permit. Lehigh will amend their Operating and Maintenance (O&M) Plan to address comment #2. The PSD applicability review discussed in comment #3 is no longer necessary because Lehigh has shut down the synthetic gypsum feeder operation.

MARIN COUNTY
Katie Rice

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
John Avalos
Edwin M. Lee
Eric Mar

1. We have added the following compliance and monitoring provisions required by the Portland Cement National Emission Standard for Hazardous Air Pollutants (NESHAP) into the appropriate source-specific applicable requirement tables.

SAN MATEO COUNTY
Carole Groom
Carol Klatt

Units	Requirements	BAAQMD Response
Cement Kiln (S-154)	63.1349(b)(2)	Added the requirement to Table IV & VII-N
Clinker Cooler (S-161)	63.1348(b)(1)(i)-(iii) 63.1349(b)(2)	Added the requirements to Table IV & VII-O
Finish Mills (S-210, S-211, S-218, S-220, S-412)	63.1350(o) 63.1350(p)	Added the requirements to Table IV & VII-V, W, Y, Z & LL
Storage Bins (S-19, S-21, S-162, S-163, S-164, S-231, S-240 and S-414)	63.1344 63.1348(b)(1)(i) 63.1350(o)	Added the requirements to Table IV & VII-C, D, P, X, AA & MM
Conveying Transfer Points (S-17, S-74, S-132, S-151, S-153, S-165, S-216, S-217, S-221, S-222, S-223, S-230, S-242, S-243, S-244, S-245, S-246, S-415 and S-444)	63.1344 63.1348(b)(1)(i)	Added the requirements to Table IV & VII-B, G, J, M, P, X AA, BB, NN & OO

SANTA CLARA COUNTY
Susan Garner
Ash Kalra
(Vice-Chair)
Liz Kniss
Ken Yeager

SOLANO COUNTY
James Spering

SONOMA COUNTY
Susan Gorin
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Spare the Air

2. Lehigh will work with the District to develop annual inspection procedures for the kiln combustion system components and develop operating and maintenance procedures for the baghouses and dust collectors associated with the lime injection system and the activated carbon injection system. These procedures will be added to Lehigh's O&M Plan. The updated O&M Plan will be submitted to EPA in the near future at a date to be agreed upon by Lehigh and EPA.
3. Lehigh has agreed to accept the original total gypsum capacity of 73,050 tons per year and to shut down two synthetic gypsum feeders (S-223 and S-246) since synthetic gypsum is no longer available on the market. As the result, there will be no increase in the gypsum throughput capacity or associated emissions. Therefore, the permit does not trigger PSD and further applicability review is not necessary. The District will remove S-223 and S-246 from the Title V permit as an administrative amendment to the permit after the gypsum feeders have been dismantled.

The District has decided to issue the renewal permit. The final permit can be viewed and/or downloaded on the BAAQMD website at <http://www.baaqmd.gov/Divisions/Engineering/Title-V-Permit-Programs/Title-V-Permits.aspx> . We will also send the final permit to you via the Electronic Permit Submittal System. If you have any questions regarding this permit, please call Barry Young, Air Quality Engineering Manager, at (415) 749-4721.

Very truly yours,

Signed by Jeff McKay for Jack P. Broadbent
Jack P. Broadbent
Executive Officer/Air Pollution Control Officer

JB:BGY:myl
Enclosure

H:\Engineering\TITLE V Permit Appls\1 ALL T5 Application Files here\A0017\Renewal-17947\3.0 Final doc\A0017_Renewal-EPA-Ltr.docx