



BAY AREA  
AIR QUALITY  
MANAGEMENT  
DISTRICT

May 10, 2011

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

Subject: Minor Revision to Major Facility Review Permit for Facility # A0017 pursuant to Application 22954

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

Dear Ms. Jordan:

This is to advise you that the Bay Area Air Quality Management District is proposing a minor revision to the Major Facility Review Permit for Lehigh Southwest Cement Company and is submitting the permit to EPA for review.

**CONTRA COSTA COUNTY**  
John Gioia  
(Vice-Chair)  
David Hudson  
Mark Ross  
Gayle B. Uilkema

The purpose of this minor revision is to include the installation of the activated carbon injection system and the mercury continuous emission monitoring system at the cement kiln (S-154) under New Source Review (NSR) Application # 22953. The activated carbon injection system will further control emissions of mercury and other air pollutants from Lehigh's cement kiln.

**MARIN COUNTY**  
Harold C. Brown, Jr.

Lehigh has requested to install a powder activated carbon injection (ACI) system to control mercury (Hg) emissions at the S-154 Kiln. This is a voluntary interim action that is intended to reduce mercury emissions below levels which the District has established for public notification under the Air Toxics Hot Spots Program. Powder activated carbon injection has been utilized in coal fired power plants, but it is new in the cement industry for Hg emission reduction and has shown to be effective in trial runs. The ACI system is a part of Lehigh's overall efforts to control mercury emissions from their facility. Lehigh will subsequently be making additional modifications, including adding a single stack, to further reduce public exposures to mercury and other toxic air contaminants.

**NAPA COUNTY**  
Brad Wagenknecht

**SAN FRANCISCO COUNTY**  
Eric Mar  
Edwin M. Lee

**SAN MATEO COUNTY**  
Carol Klatt  
Carole Groom

This revision is minor pursuant to BAAQMD Regulation 2-6-215 and will be effective immediately. The permit will be formally issued after the completion of the EPA 45-day review period. This revision is not subject to public comment and therefore, requires no public notice.

**SANTA CLARA COUNTY**  
Susan Garner  
Ash Kalra  
(Secretary)  
Liz Kniss  
Ken Yeager

The proposed changes to the Major Facility Review Permit are specified in the statement of basis report, which can be viewed on the BAAQMD website at: <http://www.baaqmd.gov/Divisions/Engineering/Title-V-Permit-Programs/Title-V-Permits.aspx>. We will also send the documents to you via the Electronic Permit Submittal System. If you have any questions on this matter, please call Dennis Jang, Senior Air Quality Engineer, at (415) 749-4707.

**SOLANO COUNTY**  
James Sperring

**SONOMA COUNTY**  
Shirlee Zane

Sincerely,

Jack P. Broadbent  
EXECUTIVE OFFICER/APCO

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Jack P. Broadbent  
Executive Officer/Air Pollution Control Officer

JPB:BFB:myl

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