



**BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT**

July 8, 2011

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 Bay Area Air Quality Management District is issuing a minor revision to the Major Facility Review Permit for the following facility:

Facility	Facility Name	Applications	Permit Engineer	City	County
A0017	Lehigh Southwest Cement Company	22954	Thu Bui	Cupertino	Santa Clara

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

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

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Eric Mar
Edwin M. Lee

SAN MATEO COUNTY
Carol Klatt
Carole Groom

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

SOLANO COUNTY
James Spering

SONOMA COUNTY
Shirlee Zane

Jack P. Broadbent
EXECUTIVE OFFICER/APCO

The 45-day EPA review period ended on June 23, 2011. EPA submitted a comment letter acknowledging the minor revision and recommended that the activated carbon injection (ACI) and mercury continuous emission monitor (CEM) be used to demonstrate compliance with requirements in the National Emission Standards for Hazardous Air Pollutants (NESHAP) in 2013. In the future, the permit will be revised to indicate that the ACI system and mercury CEM will be used to comply with the requirements of the NESHAP.

The purpose of this minor revision is to add to the Title V permit the activated carbon injection system and the mercury continuous emission monitoring system at the cement kiln (S-154) that were permitted 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.

Lehigh submitted an application 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 that 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 before September 9, 2013, the NESHAP compliance date.

The District has decided to issue the revised permit incorporating the proposed minor revision. 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

JC:THB:myl

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