



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

June 20, 2011

Mr. Dennis Jang  
Senior Air Quality Engineer  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, California 94109

Dear Mr. Jang:

Thank you for the opportunity to review the minor revision to the Clean Air Act title V permit for the Lehigh Southwest Cement Company ("Lehigh"). This permit action was submitted to the Environmental Protection Agency ("EPA") on May 10, 2011. According to the District's Statement of Basis, the purpose of this minor revision is to incorporate requirements for the installation and operation of an activated carbon injection ("ACI") system for mercury control and a mercury continuous emission monitoring system ("CEMS") at Lehigh's cement kiln into the title V permit.

The District's permit evaluation for this minor revision states that these requirements are voluntary and are intended to reduce mercury emissions under the California Air Toxics Hot Spots Program, which is a State-only requirement. It also states that the ACI system is part of Lehigh's overall efforts to control mercury emissions from the facility, and that the facility will be making additional modifications, including adding a single stack, to further reduce mercury and other hazardous air pollutants.

It is also our understanding that these controls will be used to demonstrate compliance with some or all of the requirements in the National Emission Standards for Hazardous Air Pollutants ("NESHAP") for Portland Cement Plants that apply to Lehigh, which has a future compliance date in 2013. We suggest that the future revision to the title V permit clarify that the ACI system and mercury CEMS will be used to comply with the NESHAP.

If you have any questions, feel free to contact Shaheerah Kelly of my staff at (415) 947-4156 or [kelly.shaheerah@epa.gov](mailto:kelly.shaheerah@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Gerardo C. Rios for".

Gerardo C. Rios  
Chief, Permits Office  
Air Division