



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

March 23, 2012

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

**Subject: Proposed Title V Permit for Lehigh Southwest Cement Company  
Facility #A0017**

Dear Mr. Jang:

Thank you for the opportunity to review the proposed title V permit for the Lehigh Southwest Cement Company (Facility #A0017) located in Cupertino, CA. The permit was submitted and received by the United States Environmental Protection Agency (EPA) for the 45-day EPA review period on February 16, 2012.

EPA has reviewed the permit and has discussed potential issues with the District. Enclosed are our remaining comments about incorporating missing Portland Cement National Emission Standard for Hazardous Pollutants (NESHAP) provisions, which the District has agreed to incorporate into the permit before the final permit is issued. We also have a general comment regarding the synthetic gypsum units.

Additionally, we understand that Lehigh has submitted applications, and is expected to submit additional applications, for modifying its facility to comply with the Portland Cement NESHAP. We will work with the District to allow these changes to undergo public comment and review for future revisions to the Title V permit whenever feasible.

We appreciate the District's willingness to work with us throughout this process. If you have any questions or would like to discuss this matter further, please call me at (415) 972-3974, or have your staff contact Shaheerah Kelly at (415) 947-4156 or [kelly.shaheerah@epa.gov](mailto:kelly.shaheerah@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Gerardo C. Rios", is written over a light blue horizontal line.

Gerardo C. Rios  
Chief, Air Permits Office

Enclosure

Cc: Michael Tollstrup, California Air Resource Board  
Scott Renfrew, Lehigh Southwest Cement Company

**ENCLOSURE**  
**EPA Comments on the Proposed Title V Permit Renewal for the**  
**Lehigh Southwest Cement Company (Facility #A0017)**

**Portland Cement NESHAP (40 CFR Part 63, Subpart LLL)**

1. The proposed permit does not include the following compliance and monitoring provisions required by the Portland Cement National Emission Standard for Hazardous Air Pollutants (NESHAP). The District has agreed to revise the permit to include these provisions before issuing the final permit.

<b>Units</b>	<b>Requirements</b>
Cement Kiln (S-154)	63.1349(b)(2)
Clinker Cooler (S-161)	63.1348(b)(1)(i)-(iii) 63.1349(b)(2)
Finish Mill (S-210, S-211, S-218, S-220, S-412)	63.1350 (o) 63.1350 (p)
Storage Bins (S-19, S-21, S-162, S-163, S-164, S-231, S-240, S-414)	63.1344 63.1348(b)(1)(i) 63.1350(o)
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)

2. 40 CFR 63.1347(a) requires Lehigh to prepare a written operations and maintenance plan (O&M plan). The plan must include procedures for proper operation and maintenance of equipment subject to the Portland Cement NESHAP and associated air pollution control devices. The plan must also include procedures to be used during the inspection of the combustion system components for the kiln at least once per year. Lehigh's O&M plan submitted with the proposed permit includes baghouses and dust collector control devices, but the plan does not include the lime injection system for controlling hydrochloric acid (HCl) or the activated carbon injection system for controlling mercury (Hg) emissions and total hydrocarbons (THC). Lehigh must update its O&M plan include these missing control equipment. While the compliance deadline for the requirements that apply to the lime injection system and activated carbon injection system is September 9, 2013, we recommend that Lehigh include these controls into the O&M plan as soon as possible. The District has agreed to communicate this comment to Lehigh.

## **Synthetic Gypsum Feeders**

1. The District incorporated requirements for the synthetic gypsum feeders (S-223 and S-224) into the extended title V permit on January 9, 2012, and subsequently included these requirements into the proposed permit. We note that the engineering evaluation for the Authority to Construct (ATC)/Permit to Operate (PTO) states that the use of these units allowed Lehigh to increase its gypsum (both natural and synthetic) capacity from 73,050 tons/yr to 84,210 tons/yr. The evaluation also states that there will be no emission increase because the synthetic gypsum feeders will have the same outlet grain loading requirement (0.0013 gr/dscf) and same air flow rate as in previous applications which will not result in any increase in cement production at the plant. The increase in gypsum capacity may be a modification (i.e., a physical change or change in the method of operation). As a reminder, modifications to existing major facilities must be reviewed using the calculation procedures in 40 CFR 52.21(a)(2) to determine whether a modification is subject to PSD review and should keep records of this determination. The District should conduct such an analysis for this change in capacity to determine if the modification should be processed as a significant PSD modification. Lehigh may seek advice from EPA.