

Comments 093-40198-00002
093-40210-00002

**HEIDELBERG
TECHNOLOGY CENTER**
HEIDELBERGCEMENT Group

Heidelberg Technology Center
Division of Lehigh Cement Company LLC
HeidelbergCement Group

7660 Imperial Way
Allentown, PA 18195-1040
Phone (610) 366-4600
Fax (610) 366-4606
www.lehighhanson.com

June 7, 2019

Mr. Mehul Sura
Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53, IGCN 1003
Indianapolis, IN 46204-2251

Received
State of Indiana

JUN 10 2019

Dept of Environmental Management
Office of Air Quality

**Re: Comments on PSD Significant Source and Significant Permit Modification
Lehigh Cement Company LLC - Mitchell, Indiana
Source ID 093-00002**

Dear Mr. Sura:

Please find below comments on the public comment draft Prevention of Significant Deterioration (PSD) Significant Source Modification (No. 40198) and Significant Permit Modification (No. 40210) to the Part 70 Operating Permit (Title V) for the Lehigh Cement Company LLC (Lehigh) stationary portland cement manufacturing plant located at 180 North Meridian Road in Mitchell, Indiana (Mitchell Facility). Lehigh has reviewed the draft permit and supporting documents and offers the following comments on the draft permit and accompanying Technical Support Document (TSD). Our comments have been divided into two categories below. The first category contains requests for clarification and/or confirmation of our understanding of information in the permit or TSD. The second category consists of items in the TSD that are inconsistent with the draft permit for which we request clarification in an Addendum to the TSD.

Requests for Clarifications

- 1) In certain situations, emission unit-specific conditions or citations to federal regulations found in Sections D and E of the draft permit may require monitoring, recordkeeping, or reporting on different frequencies or may otherwise be inconsistent with the general or source-wide requirements in Sections B and C of the draft permit. It is our understanding that where any such inconsistencies occur, the emission unit-specific requirements or citations to federal regulations found in Sections D and E supersede the general or source-wide requirements found elsewhere in the permit.
- 2) The emission unit description for Kiln #4 found in Sections A, D, and E of the draft permit indicates that the kiln will be controlled by an activated carbon system, among other control systems. Lehigh does intend to equip the kiln with an activated carbon system; however, we would like to clarify that this system may not need to operate at all times to achieve compliance with emission limits in the draft permit and with emission limits found in National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart LLL.

- 3) The stack testing requirements for PM₁₀ and PM_{2.5} in Conditions D.2.4, D.3.4, D.4.5, D.5.3, D.8.11, and D.12.5 of the draft permit all correctly state that PM₁₀ and PM_{2.5} include filterable and condensable PM. However, we would like to clarify that emissions of condensable PM will not be generated by all of the emissions units for which PM₁₀ and PM_{2.5} testing is required in this permit, most notably material handling emission units that are not equipped with heaters combusting fuels and operate at ambient air temperatures. Therefore, stack testing to demonstrate compliance for PM₁₀ and PM_{2.5} will not require a separate quantification of condensable PM for all emission units. Lehigh will work with IDEM's stack testing group to confirm this understanding in the test protocols for the individual stack tests on the applicable emission units.
- 4) On Page 16 of the TSD, a table is shown quantifying the emissions increases and net emissions increases associated with the proposed project for Prevention of Significant Deterioration (PSD) applicability purposes. The table in the TSD shows 0 tons per year (tpy) as the contemporaneous decrease in greenhouse gas (GHG) emissions for units that will be shut down as part of the project. Lehigh would like to clarify that there will be a large decrease in GHG emissions associated with ceasing operation of the existing kilns and other existing equipment in which fuels are combusted. However, because PSD review was triggered for GHG emissions for this project, the extra step of providing a precise quantification of the decrease in GHG emissions due to the shutdown of existing units was not provided in the application. This decision was made in an attempt to simplify the application and not provide unnecessary information for IDEM to review, while doing so in a highly conservative manner. Therefore, the net emissions increase of GHG emissions presented in the tables on Page 16 of the TSD is an overstatement.

Inconsistencies in TSD

- 5) The group of material handling conveyors listed as subject to New Source Performance Standards (NSPS) Subpart F on Pages 25 and 27 of the TSD is not consistent with the list contained in Section E.1 of the draft permit. The list in the permit is correct. Please clarify in the TSD that the following material handling conveyors are not subject to NSPS Subpart F: B5401, B5402, B5403, F2403, and B14ST01.
- 6) The list of applicable sections of NSPS Subpart F found on Page 25 of the TSD is not consistent with the list in Section E.1 in the draft permit. The list in the permit is correct. Please clarify in the TSD that the citation to 40 CFR 60.62(a)(3)(x) should be revised to 40 CFR 60.62(a)(3) to match the draft permit because there is no subsection (x) within 40 CFR 60.62(a)(3).
- 7) The list of applicable sections of NESHAP Subpart LLL found on Pages 30 and 31 of the TSD is not consistent with the list in Section E.5 of the draft permit. The list in the permit is correct. Please clarify in the TSD that 40 CFR 63.1358 is an applicable section of NESHAP Subpart LLL on Page 31 for consistency with the draft permit.
- 8) The timing for initial stack testing for the finish mill air heaters listed on Page 42 of the TSD is not consistent with the requirements in the draft permit. Condition D.9.5 of the draft permit states that initial testing for these emission units is required no later than 180 days after initial startup of Kiln #4, which is the correct interpretation. Please clarify in the TSD that the timing associated with these testing requirements is based on initial startup of Kiln #4 to ensure consistency with the draft permit.

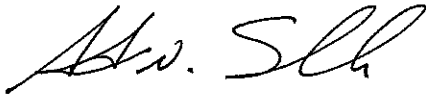
Mr. Mehul Sura
Page | 3

- 9) The timing for initial stack testing for B45034 or B5401 listed on Page 43 of the TSD is not consistent with the requirements in the draft permit. Condition D.12.5(b) of the draft permit states that initial testing for these emission units is required no later than 180 days after initial startup of Kiln #4, which is the correct interpretation. Please clarify in the TSD that the timing associated with these testing requirements is based on the initial startup of Kiln #4 to ensure consistency with the draft permit.

If there are any questions concerning this application, please do not hesitate to contact me at (610) 295-1906 or Tony Schroeder of Trinity Consultants at (317) 451-8100.

Sincerely,

HEIDELBERG TECHNOLOGY CENTER
Division of LEHIGH CEMENT COMPANY LLC



Adam N. Swercheck
Environmental Director

cc: Mr. Tony Schroeder (Trinity Consultants)

Extremely Urgent

Page 1 of 1

ORIGIN ID: ABEA
LISA TRENCE
7660 IMPERIAL WAY
ALLENTOWN, PA 18195
UNITED STATES US

(610) 366-4685

SHIP DATE: 07 JUN 19
ACTWGT: 0.11 LB
CAD: 2003779/NET4100

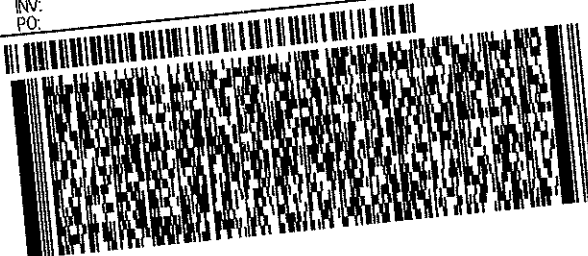
BILL SENDER

TO MEHUL SURA
IDEM
100 N SENATE AVE
MC 61-53, IGCN 1003
INDIANAPOLIS IN 46204

(610) 366-4685
INV:
PO:

REF:

DEPT:



FedEx
Express



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MON - 10 JUN 3:00P
STANDARD OVERNIGHT

TRK# 7754 1424 1077
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46204
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CARR: FEDEX

TRK#: 1001913751080004620400775414241077

RCVD: 6/10/2019 8:01:57 AM

TO: Air Quality
ROUTE: IDEM
MSC:

Dept of Environmental Management
Office of Air Quality

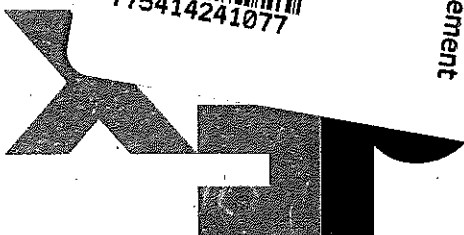
Received
State of Indiana
JUN 10 2019

SSA



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Steele & Steele, L.L.C.

Attorneys at Law

Ruel W. Steele (1992)

Byron W. Steele

Brent E. Steele

Comments
093-40198-00002
093-40210-00002
Nehal Surq

Chase Bank - Suite One
1602 "I" Street
Bedford, Indiana 47421
Tel. (812) 279-3513
Fax (812) 275-3504

May 31, 2019

Received
State of Indiana

JUN 05 2019

IDEM Office of Air Quality
100 N. Senate Ave. MC 61-53 IGCN 1003
Indianapolis, IN. 46204-2251

Dept of Environmental Management
Office of Air Quality

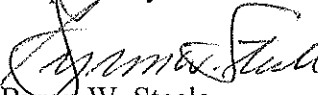
To Whom It May Concern:

I am writing this letter in support of the Lehigh Portland Cement Company's planned expansion to its Mitchell, Indiana plant. As a resident of this area, and as City Attorney for the City of Mitchell, Indiana, I am quite aware of the proposed expansion and do not see how this could possibly have a negative effect on our environment.

Lehigh Portland Cement Company has always been a national company which takes its obligations to air quality quite seriously. It has spent millions and millions of dollars in scrubbers for its smoke stacks and has taken many other steps to comply with IDEM and EPA regulations.

I urge that Idem approve this expansion. Its value to this county is great. They are a responsible corporate citizen!

Respectfully submitted:


Byron W. Steele

BWS/bws

Steele & Steele, L.L.C.

Attorneys at Law

Chase Bank - Suite One

1602 "I" Street

Bedford, Indiana 47421

Received
State of Indiana

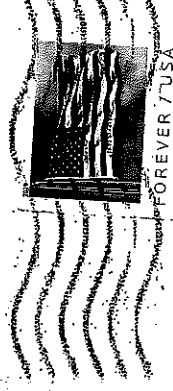
JUN 05 2019

Dept of Environmental Management
Office of Air Quality

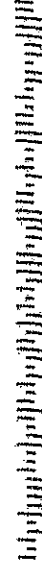
IDEM Office of Air Quality
100 North Senate Avenue MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

INDIANAPOLIS IN 462

JUN 05 2019 PM 2 1



46204-224143



Comment:

093-40198-00002

093-40216-00002



City of Mitchell

Office of the Mayor

John D. England, Jr.

June 19, 2019

Mehul Sura

IDEM, Office of Air Quality

100 North Senate Avenue

MC 61-53 IGCN 1003

Indianapolis, IN 46204-2251

Received
State of Indiana

JUN 21 2019

Dept of Environmental Management
Office of Air Quality

Dear Mehul:

On behalf of The City of Mitchell, please accept this letter of support for Lehigh Cement Company LLC in their application for significant modification of its Part 70 Operating Permit.

As a member of Lehigh's community advisory panel (CAP), I personally understand the importance of this project to the city of Mitchell, Lawrence County and the state of Indiana. The CAP represents a cross-section of the community and is a reflection of Lehigh's commitment to transparency and "being a good neighbor." Through participation in the CAP, there is open, two-way dialogue between the community and Lehigh, and this allows the community to provide input throughout the project's progress. Lehigh's more than 100-year history and commitment to the city of Mitchell has made it an invaluable partner whose success has supported the community for generations.

The more than \$600 million investment to be made by Lehigh will be a boom to the community in terms of more jobs, strengthening the economy and bring more residents to Mitchell. Our community needs this positive step to make things grow and prosper on all levels.



City of Mitchell

Office of the Mayor

John D. England, Jr.

- The new cement plant will enable Lehigh to produce cement more efficiently and sustainably through the use of state-of-the-art technology and the latest in environmental controls and systems. The modernization will improve environmental performance and reduce energy usage. This project is expected to bring more than a thousand short-term construction jobs to the Lawrence County area over the course of the four-year project with positive impacts expected for service providers in nearly every industry.
- This project will create new, high-paying, full-time jobs at the plant, and the number of indirect jobs being created is expected to make a significant economic impact on the city and county.
- There will be enhanced technical training and growth opportunities for plant employees providing additional skills and opportunities for advancement.
- Lehigh has been a great partner in the community working with local and state officials to develop increased infrastructure in Mitchell.
- Lehigh has played an important role in Lawrence County's limestone heritage, and its continued success is vital to the tourism industry and the interest it draws from those visiting.

In conclusion, I fully support the efforts of Lehigh as they seek approval for significant modification of its Part 70 Operating Permit. If you'd like to discuss further, please contact me at my office 812-849-5161 or jdengland@mitchell-in.gov

Sincerely,

JD England, Mayor of Mitchell

City of Mitchell

Office of the Mayor

407 South Sixth Street

Mitchell, IN 47446

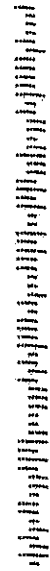
Received
State of Indiana

JUN 21 2019

Mehul Sura
IDEM, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251



46204-224143



Comment: 093 - 40128 - 00002
093 - 40210 - 00002
BOARD OF TRUSTEES

Dr. Mike Wilcox
SUPERINTENDENT
Phillip Storm
ASSISTANT SUPERINTENDENT

Malinda Powell
TREASURER

Debbie Arthur
SECY. TO BOARD/
DEPUTY TREASURER

Sherry Burkett
BENEFITS/SECRETARY

Mitchell Community Schools

441 North 8th Street • Mitchell, Indiana 47446
Phone 812-849-4481 • Fax 812-849-2133

Cynthia L. Brooking
Steve Burton
Crystal D. Mikels
Patrick Redman
Christopher S. Shaw

June 19, 2019

Re: Lehigh Cement Company Permit

Dear Mr. Sura,

Please accept this letter of recommendation in support of the Lehigh Cement Company application for significant modification of its Part 70 Operating Permit issued by IDEM.

As a member of Lehigh's community advisory panel (CAP), I personally understand the importance of this project to the city of Mitchell and surrounding area. Lehigh has been very open about this project since day one and it has been my pleasure to be a part of the advisory process.

This huge investment will not only bring construction jobs in the hundreds, but will also result in over 50 new full time, well paying, jobs in this community.

Lehigh is a great community partner and has been an asset to this area for over 100 years.

We at this agency fully support Lehigh's application to IDEM.

Sincerely,



Dr. Mike Wilcox

Superintendent of Schools

Received
State of Indiana

JUN 24 2019

Dept of Environmental Management
Office of Air Quality

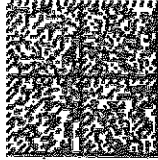
Mitchell Community Schools
Administration Center
441 North 8th Street
Mitchell, Indiana 47446

Received
State of Indiana

JUN 24 2019

Dept of Environmental Management
Office of Air Quality

**PRIORITY
MAIL**

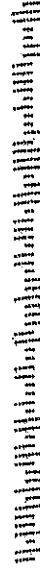


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Mehul Sura
IDEM Office of Air Quality
100 N. Senate Ave
MC 61-53 16CN 1003
Indianapolis, IN 46204-2251

46204-221099



BILLING AND REFUND WORKSHEET#2A
Title V, FESOP, and SSOA sources

Permit Reviewer: _____

Updated January 2019

Permit # _____

Date: _____

Permit Reviewer: Check off applicable fees at the left, total at the bottom. No fee applies for approvals not on this list.
NOTE: The amount shown is the total applicable fee, it includes all applicable "filing" and "permit" fees.

Title V Fees		
<input type="checkbox"/>	\$625	TV MSM (45)
<input type="checkbox"/>	\$4375	TV NSC (Minor PSD/EO) (120)
<input type="checkbox"/>	\$7500	TV NSC (Major PSD/EO) (270)
<input type="checkbox"/>	\$4375	TV SSM (Minor PSD/EO) (120)
<input type="checkbox"/>	\$7500	TV SSM (Major PSD/EO) (270)

FESOP Fees		
<input type="checkbox"/>	\$625	FESOP Min Permit Revision (45)
<input type="checkbox"/>	\$625*	FESOP Renewal / Min NSR (120)
<input type="checkbox"/>	\$4375*	FESOP Renewal / Sig NSR (120)
<input type="checkbox"/>	\$4375	FESOP NSC (Minor PSD/EO) (120)
<input type="checkbox"/>	\$7500	FESOP NSC (Major PSD/EO) (270)
<input type="checkbox"/>	\$4375	FESOP SPR (Minor PSD/EO) (120)
<input type="checkbox"/>	\$7500	FESOP SPR (Major PSD/EO) (270)
<input type="checkbox"/>	\$625	FESOP w/NSR (120)*
<input type="checkbox"/>	\$4375	FESOP w/NSR (120)*

* Bill \$625 when the permit includes a modification (new or modified equipment) at MPR levels. Bill \$4375 when the permit includes a modification (new or modified equipment) at SPR levels.

SSOA Fees		
<input type="checkbox"/>	\$4375	SSOA New Source Review (120): 1 to 4 different types of SSOAs in the same application
<input type="checkbox"/>	\$625	SSOA - 1 to 4 different types of SSOAs in the same application
<input type="checkbox"/>	\$125	SSOA Relocation

Transition Fees (Title V to FESOP only)		
<input type="checkbox"/>	\$1250	FESOP Trans from TV

Note: See "Transition scenarios - permits and fees" document located in the DearDocs Library in AirPro for more information on handling transition permits and associated fees.

Other Fees		
<input type="checkbox"/>	\$625	Interim - Any type
<input type="checkbox"/>		PAL: separate fee per PAL pollutant. \$50 per ton of allowable emissions for that PAL. Maximum combined fee for all PAL pollutants not exceed to exceed \$50,000
<input type="checkbox"/>	\$625	Public hearing (per 326 IAC 2-7-10.5(f) Title V sources are charged only for hearing for Sig Source Mod)
Number of Reviews	fee	Indicate how many reviews. Total will be calculated on invoice.
<input type="checkbox"/>	\$625	times each NSPS Review
<input type="checkbox"/>	\$625	times each NESHAP Review
<input type="checkbox"/>	\$750	times each 326 IAC 8-1-6 BACT Review
PSD BACT or LAER Review		
<input type="checkbox"/>	\$3750	2 to 5 review Analyses or
<input type="checkbox"/>	\$7500	6 to 10 Review Analyses or
<input type="checkbox"/>	\$12,500	11 or more Review Analyses
Air Quality Impact Study Review		
<input type="checkbox"/>	\$4375	If applicant does analysis
<input type="checkbox"/>		\$7500 per pollutant If OAQ does analysis

\$ _____ **Total Applicable fee:** Please carry the total over to Billing and Refund Form #1

OAQ Permits Branch Billing and Refund Worksheet #1 A

Title V, FESOP and SSOA sources

Source Name: Lehigh Cement Company TEMPO AI : 11776

Permit#: 093-40210-00002

CST #:

Invoice #:

Credit for permit fees:\$

Payment ID#

Date Rec'd:

Note: IDEM's accounting office requires that fee bills or refunds, be sent to the accounts Department at the billing address listed on application. If a courtesy copy is needed, Please indicate at the bottom of this page.

Permit Reviewer please indicate applicable fees on worksheet #1B

Total Due: \$ 0

Total Credit: \$

Total Permitting Fees Applicable: \$ 0

Total Refund Due: \$

Reason for Refund:

A courtesy copy of the billing has been requested by the applicant, please send to:

Name/Title: _____

Address: _____

Permit Reviewer:

Date: