

## NOTICE INVITING WRITTEN PUBLIC COMMENTS

**NOTICE** is hereby given that the Executive Officer/Air Pollution Control Officer of the Bay Area Air Quality Management District invites interested persons to submit written public comments on the proposed renewal of the Major Facility Review Permit for the following facility:

| Application No. | Facility No. | Facility Name   | Address  | Type of Operation       |
|-----------------|--------------|---|--|-------------------------|
| 17947           | A0017        | Lehigh Southwest Cement Company<br>(formerly Hanson Permanente<br>Cement Company) | 24001 Stevens Creek Blvd.<br>Cupertino, CA 95014 | Cement<br>Manufacturing |

Major facilities are required to obtain operating permits under Title V of the 1990 Clean Air Act Amendments, the Federal Operating Permit Program and the District's Regulation 2, Rule 6 - Major Facility Review. The Title V Permit is a compilation of all existing applicable local, state and federal air quality requirements including emissions limits and standards, monitoring, recordkeeping, and reporting requirements.

The initial Title V permit for this facility was issued on November 5, 2003. Lehigh submitted an application for their renewal Title V Permit to the District on April 28, 2008. Since the initial issuance of the Title V Permit, the District has changed the equipment list to include source additions, modifications and exemptions. Also, the District reviewed and updated all Federal, State and Local requirements, standards, testing, monitoring, record keeping and reporting requirements. In addition, the District reviewed the compliance status of all sources. All revisions are noted and explained in detail in the Statement of Basis for the proposed renewal Title V Permit. Details of the previous revisions can be found in Section X of the permit "Revision History". All proposed changes to the current permit are clearly shown in strikeout/underline format for the first public notice and double strikeout/underline format for the second public notice.

The District conducted a public hearing in Cupertino on September 17, 2009, to solicit comments on the proposed Title V permit renewal for the Lehigh facility, and a written public comment period ended on October 1, 2009.

On January 5, 2010, the District withdrew the proposed Title V permit renewal for the Lehigh facility. This was done because EPA is expected to adopt significantly more stringent standards for mercury and other toxic air contaminants from cement plants in amendments to 40 CFR 63, Subpart LLL, National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry. The final EPA rule amendments were adopted and published on September 9, 2010. The District incorporated the following items into the Title V permit:

- Added new standards from the amended NESHAP rule
- Added a facility-wide permit Condition #24621 to include the Fugitive Dust Control Plan and source test requirement for small sources
- Added most recent applications for loss of exemption of portable IC engines, Mercury and Hydrochloric Acid reduction
- Addressed EPA's comments and updated the Compliance Assurance Monitoring (CAM) Analysis. CAM Condition #24781 was added to the Title V permit
- All second revisions are noted and explained in detail in the Statement of Basis for the proposed renewal Title V Permit

The Air Pollution Control Officer invites written comment on any aspect of the proposed renewal Title V Permit. Comments must be received by **March 25, 2011**.

The Title V Permit must be renewed every five years with public notice and review by US EPA. If US EPA has not objected to a proposed permit and District has not addressed a public comment in a satisfactory manner, the public may petition US EPA, Region IX, Operating Permits Section at 75 Hawthorne Street, San Francisco, CA 94105, within 60 days after the end of US EPA's review, to reconsider the decision to not object to the permit. The beginning and end of EPA's review period can be found on the EPA Region IX website at: <http://www.epa.gov/region09/air/permit/index.html>.

The proposed renewal Title V Permit, Statement of Basis, renewal application, and other relevant documents are available for public inspection at the District Headquarters, 939 Ellis Street, San Francisco, CA, in the Engineering Division, 3rd Floor. For an appointment, please call May Leung at (415) 749-4729. The proposed renewal Title V Permit, Statement of Basis and BAAQMD responses to EPA comments are also available on the District's webpage at the following address: <http://www.baaqmd.gov/Divisions/Engineering/Title-V-Permit-Programs/Title-V-Permits.aspx>. Written comments should be directed to Thu Bui, at the Bay Area Air Quality Management District, 939 Ellis Street, San Francisco, CA 94109 or by email to [tbui@baaqmd.gov](mailto:tbui@baaqmd.gov). Any request for information should be directed to Thu Bui at (415) 749-5119.

**Dated at San Francisco, the 7<sup>th</sup> day of January, 2011.**

**Signed by Jeff McKay for Jack P. Broadbent**

**Jack P. Broadbent**

**Executive Officer/**

**Air Pollution Control Officer**

**Bay Area Air Quality Management District**