



# WORKSHOP NOTICE

November 17, 2011

BAY AREA

AIR QUALITY

MANAGEMENT

DISTRICT

TO: INTERESTED PARTIES  
FROM: EXECUTIVE OFFICER / APCO  
SUBJECT: **PUBLIC WORKSHOP –DRAFT REGULATION 9, RULE 13:  
NITROGEN OXIDES, PARTICULATE MATTER, AND TOXIC  
AIR CONTAMINANTS FROM PORTLAND CEMENT  
MANUFACTURING**

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The staff of the Bay Area Air Quality Management District will conduct a public workshop to present, discuss, and receive comments on the draft Regulation 9, Rule 13: Nitrogen Oxides, Particulate Matter, and Toxic Air Contaminants from Portland Cement Manufacturing (Rule 9-13). The details of the upcoming workshop are presented below:

**Monday, Dec. 12, 2011**  
**Open House: 5 pm to 6 pm**  
**Workshop: 6 pm to 8 pm**

**Monta Vista High School**  
**Cafeteria**  
21840 McClellan Road  
Cupertino, CA 95014

## BACKGROUND

The Bay Area Air Quality Management District (District or BAAQMD) has the authority to regulate air pollutant emissions from stationary sources throughout the nine counties surrounding the San Francisco Bay. Portland cement manufacturing requires the application of intense heat to raw materials such as limestone and iron to cause chemical reactions in the raw materials and fuse them together to produce cement clinker. The clinker is then ground into a fine powder and mixed with gypsum and other additives to produce cement. Air pollutant emissions from cement manufacture include criteria pollutants (carbon monoxide, nitrogen oxides, particulate matter, sulfur dioxide, and volatile organic compounds) and toxic air contaminants (ammonia, benzene, hydrochloric acid, dioxins and furans, mercury, and other trace metals). There is one Portland cement manufacturing facility in the Bay Area: Lehigh Permanente operated by Lehigh Southwest Cement Company and located in unincorporated Santa Clara County west of Cupertino.

## DRAFT PROPOSAL

In 2010, the United States Environmental Protection Agency adopted amendments to federal rules to reduce air emissions from Portland cement manufacturing, with compliance due in September of 2013. District staff has evaluated the standards of these rules to ascertain their application to the Lehigh Permanente facility and to

determine what additional measures could be employed to ensure that emissions of air pollutants are reduced in a health protective, cost effective manner. Based on this evaluation, District staff has developed a draft rule to limit emissions from cement manufacturing in the San Francisco Bay Area. The proposed rule considers measures at Lehigh Permanente to mitigate emissions and decrease their effect on public health.

The proposed rule will address emissions of nitrogen oxides (NOx), particulate matter (PM), and toxic air contaminants (TACs) from Portland cement manufacturing through several requirements and standards:

### **Requirements:**

#### Emissions Limits:

- NOx: 2.3 lbs. per ton of clinker produced;
- PM: 0.04 lbs. per ton of clinker produced;
- Ammonia (NH<sub>3</sub>): 10 parts per million by volume (ppmv) above baseline levels;
- Dioxins and Furans (D/F): 0.2 nanograms per dry standard cubic meter;
- Mercury (Hg): 55 lbs. per million tons of clinker produced;
- Total Organic Hazardous Air Pollutants (HAPs): 9 ppmv;
- Hydrogen Chloride (HCl): 3 ppmv.

#### Other requirements:

- 300 foot stack for emissions from kiln;
- 10% opacity standard for miscellaneous operations;
- Dust mitigation plan submittal, public comment, review, and approval process.

#### Monitoring, Recordkeeping, and Reporting:

- Continuous emissions monitoring system (CEMS) for NOx;
- Parametric monitoring systems for PM, NH<sub>3</sub>, D/F, Hg, total organic HAPs, and HCl;
- Production monitoring system;
- Maintain records to determine compliance with the above emissions limits;
- Report any violation of emissions standards;
- Provide monthly written reports for all CEMS and parametric monitoring systems.

### **INFORMATION AND COMMENTS**

In addition to the draft Rule 9-13, District staff has prepared a workshop report to provide background and additional information on the draft rule. Staff invites your comments and questions about the proposed rule and workshop report. Staff is also available to meet with interested parties regarding the proposal. All comments will be considered and the proposed rule revised as needed before it is presented to the District's Board of Directors for adoption at a public hearing.

For copies of the draft Rule 9-13 and the Workshop Report, please visit our website at <http://www.baaqmd.gov/pln/ruledev/workshops.htm>. For questions or comments on the regulatory proposal, please contact Robert Cave at (415) 749-5048 or [rcave@baaqmd.gov](mailto:rcave@baaqmd.gov). Interested parties are invited to submit comments on the draft Rule or the Workshop Report. The deadline for comments is January 3, 2012.

# Directions to Monta Vista High School

## FROM 280 NORTH OR 280 SOUTH

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- (1) Exit HWY 85 South.
- (2) Take first exit, Stevens Creek Blvd. Make a right turn.
- (3) At the first light, make a left onto Bubb Road.
- (4) Go 0.5 miles, make a right turn onto McClellan Road (there is a light).
- (5) Go 0.25 miles, make a left turn into the Bus Circle (where you see the Monta Vista sign).

## FROM 85 NORTH OR HIGHWAY 17

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- (1) Take HWY 85 North to Stevens Creek Blvd. exit.
- (2) Turn left at the light, onto Stevens Creek Blvd.
- (3) At the second light, make a left turn onto Bubb Road.
- (4) Go 0.5 miles, make a right turn onto McClellan Road (there is a light).
- (5) Go 0.25 miles, make left turn into the Bus Circle (where you see the Monta Vista sign).



