



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

March 25, 2020

Mr. Joe Winch
Environmental Manager
Lehigh Cement Co.
3084 West County Road 225 South
Logansport, IN 46947
joe.winch@lehighhanson.com

Re: Stack Test Extension Request
Lehigh Cement Company
Logansport Plant
Plant ID: 017-00005
Logansport, Cass County

Dear Mr. Winch:

This letter is in response to your March 23, 2020 request for an extension of particulate matter stack testing to be conducted on clinker coolers #1 and #2. PM testing is required by permit condition E.5.2 of permit T017-41677-00005, with a test deadline of within one year of the previous stack test (due March 28, 2020).

Lehigh Cement Company requested this extension in order to achieve adequate production rates to test and to minimize the potential exposure of site and testing personnel to COVID-19. At this time, IDEM cannot approve your request to extend the required testing deadline. Please be aware that failure to conduct the required testing within one year of the previous testing date is a violation of your permit. However, if the required testing is completed by June 30, 2020, no enforcement action will be taken for failing to test before the applicable deadline.

If you have any questions regarding this matter, please contact Pat Austin at (317) 234-3491 or via e-mail at paustin@idem.IN.gov. Thank you for your attention to this matter.

Sincerely,

Phil Perry, Chief
Air Compliance and Enforcement Branch
Office of Air Quality

cc: Dave Cline
Pat Austin

Lehigh Cement Company

Logansport Plant
3084 W. CR 225 S.
Logansport, IN 46947
Phone (574) 753-5121
www.lehighcement.com

E-Mail only

March 23, 2020

Mr. Patrick Austin
Air Compliance and Enforcement Branch
Indiana Department of Environmental Management
100 North Senate Avenue
IGCN 1003
Indianapolis, IN 46204-2251

RE: Lehigh Cement Company LLC – Logansport, IN
Request for Approval for Modification of Compliance Testing Date

Dear Mr. Austin:

On February 16, 2020, Montrose Air Quality Environmental Services, LLC (Montrose), on behalf of Lehigh Cement Company, LLC (Lehigh), submitted to IDEM a test program at the Lehigh-Logansport facility. The purpose of the test program is to determine compliance of filterable particulate matter (Filterable PM) from the Clinker Coolers 1 (EU412) and #2 (EU421) common stack (EP404) with the emission standards published in the Portland Cement Maximum Achievable Control Technology (PC MACT) rule; Title 40, Part 63 of the Code of Federal Regulations (40 CFR 63) Subpart LLL – National Emission Standard for Hazardous Air Pollutants (NESHP) from the Portland Cement Manufacturing Industry. The test date presented in the protocol was March 23, 2020.

Beginning March 8, 2020, Lehigh has completed extensive maintenance and repairs on one of our kilns (K2) and the associated Electrostatic Precipitator (ESP) particulate control device. The work was originally scheduled to be complete and startup of the kiln to accommodate the March 23 compliance testing. Due to unanticipated delays in completion of the work, startup of K2 is expected to resume late today (March 23). As additional time is required to achieve operation at an adequate production rate for a successful compliance test, it is not possible to meet the clinker cooler compliance testing date of March 23 presented in the test protocol.

Allowing time for ramp up in production rate after the prolonged outage, under normal circumstances we would proceed with the clinker cooler testing as soon as possible after achieving stable production, which we expect as early as Thursday this week (March 26). However, in consideration of the current extraordinary and highly dynamic circumstances of COVID-19, and our obligation as a responsible corporate citizen, we believe we would be remiss if we did not explore more socially responsible alternatives than simply delaying the testing for a few days, while still being fully protective of the environment.

Lehigh is requesting, within the extent of the agency's authority to do so, approval to reschedule the annual clinker cooler compliance testing until the second quarter of 2020, with the caveat that a request for additional extension of the testing may be requested should circumstances regarding the COVID-19 virus dictate.

I may be contacted at (574) 739-6132 or joe.winch@lehighhanson.com.

Kind regards,



Joe Winch
Environmental Manager

Cc: Dave Cline, IDEM Compliance Data Section