



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

April 28, 2020

Mr. Joe Winch
Lehigh Cement Company
3084 W Co. Rd 225 S.
Logansport, IN 46947

RE: Relative Accuracy Test Audit (RATA)
Extension Letter
Lehigh Cement Company
Logansport, Indiana – Cass County
Source ID # 017-00005

Dear Mr. Winch:

This letter is in response to your March 20, 2020 request for an extension of the Relative Accuracy Test Audit (RATA) deadlines required for the CEMS installed on Kiln 1 and Kiln 2 at the Logansport, IN facility. The RATAs are required to be conducted once every four calendar quarters and based on the current RATA schedule, you were to conduct the RATAs in the 1st Quarter of 2020.

Lehigh Cement Company requested this extension in order achieve adequate production rates to test and to minimize the potential exposure of site and testing personnel to COVID-19. Additionally, Lehigh Cement Company has proposed to conduct the RATAs on the analyzers in the 2nd Quarter 2020. At this time, IDEM cannot approve extending the required RATA deadlines. However, if the 2020 RATAs are conducted no later than the end of the 2nd Quarter 2020, no enforcement action will be taken for failing to test before the applicable deadlines.

Please be aware that failure to perform the 2020 RATAs by the end of the 2nd Quarter of 2020 will be considered a violation of your permit and may result in a referral for enforcement action. Additionally, IDEM recommends conducting Cylinder Gas Audits on the above mentioned CEMS in the 1st Quarter of 2020 and any subsequent quarter when a RATA is not conducted.

If you have any further questions regarding this matter, please contact Jarrod Fisher at (317) 233-2723 or at (800) 451-6027 and ask for extension 3-2723 (in Indiana) or at jfisher@idem.in.gov.

Sincerely,



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

PRP/jcf

cc: Pat Austin

From: [FISHER, JARROD](#)
To: [Alderman, Sara](#)
Subject: RE: postponement of RATA testing
Date: Wednesday, April 29, 2020 12:43:18 PM

From: Winch, Joseph (Logansport) USA [<mailto:joe.winch@lehighhanson.com>]
Sent: Tuesday, April 28, 2020 8:08 AM
To: Cline, Dave <DCLINE@idem.IN.gov>
Subject: postponement of RATA testing

****** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ******

Dave-

The trailing e-mail was sent to you on March 20, 2020, regarding annual PM compliance testing of our clinker cooler and RATA testing on Kilns 1 and 2. The clinker cooler rescheduling was addressed in a letter from Pat Austin. Regarding the RATA testing, you and I had a telephone conversation on March 20 wherein I proposed to postpone the RATA testing in Q2, and conduct the Cylinder Gas Audits (CGA) normally scheduled in Quarter 2, in March. My recollection of our conversation was that, under the circumstances surrounding COVID-19, IDEM would be unlikely to pursue enforcement action for a late RATA. Could you please provide a written affirmation regarding the rescheduling of the RATA test. An e-mail in lieu of a formal letter is acceptable, though I understand IDEM SOP may require a more formal process. An example of the acknowledgement letter for rescheduling of the clinker cooler performance testing is attached as an example.

Kind regards,

Joe Winch
Environmental Manager

Lehigh Cement Company
3084 W. Co Rd 225 S.
Logansport, IN 46947
Phone : 574-739-6132
Cell Phone: 610-762-7864
Joe.Winch@lehighhanson.com
www.LehighHanson.com

From: Winch, Joseph (Logansport) USA
Sent: Friday, March 20, 2020 12:39 PM
To: 'dcline@idem.in.gov' <dcline@idem.in.gov>
Subject: FW: postponement of RATA and compliance testing

Hi Dave-

I left you a voice mail earlier this morning and see you had called me back.

During March 8-20, we have done extensive maintenance and repairs on one of our kilns (K2) and the associated Electrostatic Precipitator (ESP) particulate control device. Due to unanticipated delays in completion of the work, there is not enough time to complete the repairs and resume normal production to accommodate the clinker cooler compliance testing on March 23 and commence RATA testing of the two kilns on March 24, as presented in the test protocols submitted to IDEM.

We are highly confident that our production levels will be adequate to accommodate testing the following week, commencing March 30. However, in consideration of the current extraordinary circumstance of a world wide pandemic, 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 one week, while still being fully protective of the environment.

We are requesting approval to **postpone the** annual clinker cooler compliance testing and the **kiln1 and kiln 2 RATA testing into the second quarter of 2020**. Under this scenario, we would conduct the Cylinder Gas Audits (CGA) normally scheduled in Quarter 2, in March.

Joe Winch, PE

Environmental Manager

Lehigh Cement Company

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