



Carolinac Cement Company
4312 Henson Drive
Wilmington, NC 28405
Telephone (910) 799-2640
Fax (757) 855-4852

January 5, 2011

Dr. Donald R. van der Vaart, Ph.D, P.E.
Chief, Permitting Section, Division of Air Quality
North Carolina Department of Environment and Natural Resources
2728 Capital Boulevard
Raleigh, North Carolina 27604

Re: Revised PSD Construction Permit Application
Carolinac Cement Company LLC

Dear Dr. van der Vaart:

Enclosed are revisions to our permit application (6 copies) to construct a Portland cement manufacturing facility near Castle Hayne, North Carolina. This revision reflects numerous regulatory changes to emission limits and ambient air quality standards applicable to the facility as per the enclosed list. A revised Class II and Ambient Air Quality Standards Dispersion Modeling Report (Tab E) and greenhouse gas best available control technology (BACT) analysis (new Tab H) will be submitted under separate cover.

If you have any questions or need additional information, please give me a call at (757) 858-6523 or contact Jay Willis, Corporate Environmental Manager at (540) 966-6534.

Sincerely yours,

A handwritten signature in blue ink that reads 'R.A. Fink'.

Russell A Fink
Vice President/General Counsel

Enclosures

SUMMARY OF PERMIT APPLICATION CHANGES

- CCC will be subject to the revised New Source Performance Standards (NSPS) for Portland cement plants, which substantially reduces emissions of particulate matter (PM), PM₁₀, PM_{2.5}, nitrogen oxides (NO_x), and sulfur dioxide (SO₂) relative to our previous application. The plant will also be subject to revised National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements for mercury and total hydrocarbons and new requirements for hydrogen chloride (HCl). The changes in regulatory requirements and proposed emission limits are reflected in the revised Regulatory Analysis Report (Tab A) and Permit Application Forms (Tab B). The Control Technology Analysis Report (Tab D) and the Plantwide Potential Emission Inventory (Tab C) have also been updated to reflect the revised NSPS and NESHAP limits.
- CCC is requesting permit limits to ensure that the facility will be an area source of Hazardous Air Pollutants (HAPs) – see Revised Regulatory Analysis Report (Tab A).
- In part as a result of the revised NSPS and NESHAP changes, changes have been made to the control equipment and other design features of the facility. These changes include the use of activated carbon injection to control mercury and a wet scrubber for SO₂ and HCl control. Revised pages to Tab G (Plot Plans, Survey Maps, and Process Flow Diagrams) are being submitted reflecting these changes.