

February 25, 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
Carolinas Cement Company LLC

Dear Dr. van der Vaart:

Enclosed are revisions to our permit application to construct a Portland cement manufacturing facility near Castle Hayne, North Carolina. This revision reflects changes to the Class II and Ambient Air Quality Standards Dispersion Modeling Report (Tab E) and the Control Technology Analysis Report (Tab D) as per the enclosed list.

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,

Russell A Fink
Vice President/General Counsel

Enclosures

SUMMARY OF CHANGES

MODELING REPORT

- Table 15 has been revised to include the results of the annual increment runs for PM₁₀.
- The footnote to Table 22 has been corrected to indicate that the concentrations do include background.
- As requested, NO₂ and PM₁₀ have been remodeled with a 100 m grid spacing around the maximum predicted concentrations. Tables 16, 17, and 20 have been updated accordingly.
- The NAAQS remodeling for NO₂ includes, to the extent information was available, emissions from individual stacks within the Significant Impact Area rather than combining emissions as a representative stack.
- HCl concentrations in Table 23 have been revised to reflect emission limits under the NESHAP rule for major sources.
- A detailed analysis of impacts on soils and vegetation has been added to the Modeling Report as Appendix H.

CONTROL TECHNOLOGY ANALYSIS

- Proposed BACT limits for miscellaneous sources controlled by baghouses have been reduced, reflecting the use of membrane bags or an equivalent particulate removal technology.
- HCl emission limits were revised consistent with major source status.
- Proposed BACT for additive material handling and unloading sources has been clarified.