



North Carolina Department of Environment and Natural Resources  
Division of Air Quality

Beverly Eaves Perdue, Governor

Dee Freeman, Secretary  
B. Keith Overcash, P.E., Director

March 23, 2010

Mr. James S. Willis  
Corporate Environmental Manager  
Titan America  
6071 Catawba Road  
Troutville, Virginia 24175

Subject: PSD Permit Application  
Additional Information Request  
Carolinas Cement Company, LLC  
Castle Hayne, North Carolina  
New Hanover County  
Facility ID: 6500296

Dear Mr. Willis:

This letter is written to request further information related to your application for an air quality permit. On October 20, 2009 a public hearing was held in order to take comments from the public regarding the North Carolina Division of Air Quality's (NCDAQ) preliminary determination and draft permit. The hearing officer prepared a report summarizing the public comment and recommending additional review before the NCDAQ takes final action on your application. One of these recommendations was to have the Permits Section of the NCDAQ request that Titan provide the following information under the broad authority granted under §143-215.108:

1) Please provide an amended analysis of the impact that mercury emissions from your proposed facility will have in the North Cape River Fear Basin. This amended analysis should be based on mercury emission that would result from compliance with both the mercury limit proposed in the draft permit as well as the emission limit in the proposed federal Environmental Protection Agency (EPA) MACT standard.

2) Please provide a written plan detailing how Titan would propose to comply with the proposed NESHAP/MACT requirements for hazardous air pollutant emissions, including mercury. This plan should address whether Titan can achieve compliance with the proposed mercury standard without discharging water containing mercury to waters of the State, and if so the details of how compliance will be demonstrated.

If you have any questions or concerns, please contact Booker T. Pullen at (919) 715-6248 or [booker.pullen@ncdenr.gov](mailto:booker.pullen@ncdenr.gov).

Sincerely,

Donald R. van der Vaart, Ph.D., P.E.,  
Chief, Permitting Section

c: Central files  
Wilmington Regional Office