

From: Matz, Tim [tmatz@htcnam.com]
Sent: Tuesday, June 17, 2008 9:52 AM
To: Barnett.Keith@epamail.epa.gov
Cc: Laney, Michael N.

Attachments: FW: Mercury Results Attached

Keith,

I have not found any other errors. Attached is more coal data for UB.

Timothy L. Matz
Director of Environmental Affairs

Lehigh Cement Company / HTC Company
7660 Imperial Way
Allentown, PA 18195
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tmatz@htcnam.com

-----Original Message-----

From: Barnett.Keith@epamail.epa.gov
[mailto:Barnett.Keith@epamail.epa.gov]
Sent: Monday, June 09, 2008 3:37 PM
To: Matz, Tim
Cc: Michael Laney
Subject: Fw: Section 114 Data

Dear Tim:

On March 4, 2008, Mike Laney at RTI sent you this email requesting comments, if any, on the data and calculations we performed using the data you submitted to us on mercury and TOC. We received one comment on this information, which was to correct the coal mercury concentration for the Unionbridge facility. We received no other comments, so we are assuming everything else is correct. We need to begin using this information this week in order to meet our rule schedule. If you have found any errors, please contact me as soon as possible.

Also, were you intending to send additional information on Unionbridge coal? We only have one data point at this time. I was assuming that you planned to take additional samples and send those to us.

Keith W. Barnett
USEPA/OAQPS/SPPD/MMG
Mail Code D243-02
Research Triangle Park, NC 27711
919-541-5605
barnett.keith@epa.gov

----- Forwarded by Keith Barnett/RTP/USEPA/US on 06/09/2008 03:12 PM -----

From: "Laney, Michael N." mnl@rti.org
To: "Matz, Tim" <tmatz@htcnam.com>
Sent: 03/04/2008 06:17 PM
Cc: Keith Barnett/RTP/USEPA/US@EPA
Subject: Section 114 Data

Dear Mr. Matz:

As you may remember, I am working with Keith Barnett of the EPA on the revisions to the Portland cement NESHAP. Specifically, I have been compiling the data submitted by your company on the mercury and total organic content of the raw materials and fuel used in the production of cement. Attached is the data we compiled for the Lehigh facilities and our estimate for each kiln of mercury emissions as well as total organic content of the raw materials fed to the kiln. Also attached is a brief overview of the approach used to estimate mercury emissions and the total raw material TOC entering each kiln. At this time, we have not entered the mercury and TOC data for the Leeds, Alabama facility as we were waiting for an electronic version of the data, which were more complex than other data submittals, to facilitate the data entry. We were instructed by EPA to proceed without the data with the possibility that it could be entered later.

Given the large amount of data that had to be entered into the database and the complexity of some of the concentration and usage data, there were opportunities for errors. We have checked the data as well as the calculations for mistakes. Invariably it is likely that we have made some data entry mistakes or we may have incorrectly interpreted data that were submitted. We would appreciate your review of the data and calculations and your feedback with any problems you find.

If you have any questions, feel free to contact me. Thanks again for your assistance.

Mike

Michael Laney
Environmental Engineering
Environmental Health & Safety Division
RTI International
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EMAIL: mnl@rti.org

From: Deery, Kurt [KDeery@LEHIGHCEMENT.COM]
Sent: Monday, June 09, 2008 8:13 AM
To: Martin, Kent; Luckin, Jeremy; Alesi, Shane; Matz, Tim; Sterner, Richard; Hook, Jeff; Stover, Eric
Subject: FW: Mercury Results Attached

Attachments: Lehigh UB 6-2-08 Mercury.doc

FYI>>>

Kurt W. Deery
Environmental Engineer
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From: Bradley Dutterer [mailto:bdutterer@fval.com]
Sent: Friday, June 06, 2008 3:48 PM
To: Deery, Kurt
Subject: Mercury Results Attached

Fountain Valley Analytical Laboratory, Inc.

1413 Old Taneytown Rd. • Westminster, MD 21158 • (410) 848-1014 • FAX (410) 848-0298

CHEMICAL • MICROBIOLOGICAL • PHYSICAL • WATER ANALYSIS

ANALYTICAL REPORT

LAB ID	DATE SAMPLED	MATRIX	MERCURY by SW7471	UNITS	DATE ANALYZED	QUALIFIER	REPORTING LIMIT	DILUTION FACTOR	% SOLIDS
67474	5/14/08	Kiln Feed	1.0	mg/kg	5/23/08	D	0.38	20	100
67476	5/14/08	CKD (Dust)	42.0	mg/kg	5/23/08	D	0.97	50	100
67477	5/14/08	Coal	2.5	mg/kg	5/23/08	D	0.36	20	100
67478	5/14/08	Fly Ash	0.31	mg/kg	5/23/08	JD	0.38	20	100
67479	5/14/08	Clinker	0.022	mg/kg	5/23/08		0.02	1	100
67480	5/14/08	DBS	1.4	mg/kg	5/23/08	D	0.42	20	94
67481	5/9/08	Kiln Feed	0.88	mg/kg	5/23/08	D	0.38	20	100
67483	5/9/08	CKD (Dust)	53.6	mg/kg	5/30/08	D	2	100	100
67484	5/9/08	Coal	3.4	mg/kg	5/23/08	D	0.38	20	100
67485	5/9/08	Fly Ash	0.82	mg/kg	5/23/08	D	0.38	20	100
67486	5/9/08	Clinker	<0.019	mg/kg	5/23/08	U	0.019	1	100
67487	5/8/08	Kiln Feed	1.3	mg/kg	5/23/08	D	0.38	20	100
67488	5/8/08	Raw Meal	1.0	mg/kg	5/23/08	N*D	0.39	20	100
67489	5/8/08	CKD (Dust)	34.8	mg/kg	5/30/08	N*D	0.99	50	100
67490	5/8/08	Coal	2.0	mg/kg	5/23/08	N*D	0.39	20	100
67491	5/8/08	Fly Ash	0.073	mg/kg	5/23/08	JN*D	0.38	20	100
67492	5/8/08	Clinker	0.094	mg/kg	5/23/08	N*	0.019	1	100
67493	5/13/08	Kiln Feed	0.41	mg/kg	5/30/08	JN*D	0.97	50	100
67494	5/13/08	CKD (Dust)	0.87	mg/kg	5/23/08	N*D	0.39	20	99
67495	5/13/08	Coal	4.1	mg/kg	5/23/08	N*D	0.38	20	100
67496	5/13/08	Fly Ash	0.44	mg/kg	5/23/08	N*D	0.38	20	99
67497	5/13/08	Clinker	0.0075	mg/kg	5/23/08	JN*	0.019	1	100
67498	5/13/08	DBS	1.3	mg/kg	5/23/08	N*D	0.43	20	93

LAB ID	DATE SAMPLED	MATRIX	MERCURY by SW7471	UNITS	DATE ANALYZED	QUALIFIER	REPORTING LIMIT	DILUTION FACTOR	% SOLIDS
67500	5/6/08	Kiln Feed	1.5	mg/kg	5/23/08	N*D	0.37	20	100
67501	5/6/08	Raw Meal	0.25	mg/kg	5/23/08	JN*D	0.39	20	100
67502	5/6/08	CKD (Dust)	18.6	mg/kg	5/23/08	N*D	0.38	20	100
67503	5/6/08	Coal	1.9	mg/kg	5/23/08	N*D	0.37	20	100
67504	5/6/08	Fly Ash	0.39	mg/kg	5/23/08	JN*D	0.39	20	100
67505	5/6/08	Clinker	0.039	mg/kg	5/23/08	N*	0.02	1	99
67506	5/6/08	DBS	0.67	mg/kg	5/23/08	N*D	0.42	20	94

NOTES:

1. mg/kg: milligrams per kilogram as dry weight (also, parts per million)
2. Sample collected by client, analyzed as received
3. Subcontracted to Reference Lab #110
4. Mercury Prep method: SW3052
5. Mercury analytical method: SW7471
6. Solids/ Moisture method: CLP Solids
7. Qualifier U: Indicates that the compound was analyzed for but not detected at or above the reporting limit.
8. Qualifier D: Indicates that the analyte was reported from a diluted analysis.
9. Qualifier J: Value is less than the reporting limits but greater than the MDL.
10. Qualifier N: Spiked sample recovery not within control limits.
11. *=Duplicate analysis not within control limits.

Date Reported: 06/02/08

Reviewed By: _____

Bradley C. Dutterer

MD State Certification #133