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Portland Cement Association

PCA Perspectives on Key Portland Cement NESHAP Issues

December 2012

Introduction

- PCA supports and affirms both the process and the substance of the NESHAP revisions
 - ✓ Revised rule addresses the D.C. Circuit Courts remand of the NESHAP
 - ✓ Revised rule is the keystone of a Settlement Agreement between the cement industry and EPA that resolved long standing litigation
 - ✓ NESHAP should produce real, achievable reductions in hazardous air pollutants from cement kilns
 - ✓ Cement industry needs the final NESHAP rule issued as soon as possible.

Modification to PM Emission Standard

- Reconsideration of PM standard central to NESHAP reconsideration
 - ✓ Reconsideration of data supported proposed change to the PM standard
 - ✓ PCA and EPA agree that the CEMs required in the current rule do not work for PM and HCl
 - CEMs cannot be calibrated for PM and CEMs have not been standardized for HCl
 - The revised rule should address both these problems by:
 - ✓ Switching back to stack testing for PM, and
 - ✓ Providing time for EPA to finish standardization of HCl CEMs
 - ✓ Implementation of the new PM standard will require rethinking of technology selections; the compliance deadline reset will be critical to properly making these technology reconsiderations.

Compliance Deadline Reset

- Cement industry will need full 24 months to implement new rule
 - ✓ PCA has studied the time necessary and has confirmed with vendors that it will require at least 24 months to reach compliance
 - Reset of compliance date from September 2013 to September 2015 is vital
 - ✓ 60% of plants will have to rethink their compliance approach and selection of control strategies
 - ✓ We do not have the time to change direction back to the current rule and get the controls installed and operating in less than a year
 - Cement consumption in 2012 continues at historic lows, a trend which is expected to continue for the next few years
 - Plant capacity utilizations are averaging less than 70%, with many plants running intermittently.

Other Issues

- PCA has engaged in constructive discussion with EPA on the following issues:
 - The use of work practices during start-up and shutdown
 - A means by which to adjust the PM and hydrocarbon compliance demonstrations to avoid unnecessary testing
 - A definition of “open clinker storage pile” and associated compliance demonstrations.

Closing Remarks

- New Chapter in Industry/EPA relations
 - ✓ PCA committed to ensuring NESHAP process completed successfully and building on new relationship with EPA
 - ✓ PCA has worked closely and openly with EPA and we believe that the revised NESHAP will become a model for future regulatory engagements
 - ✓ The revised rule strikes the right balance
 - Significant reductions in emissions
 - Realistic ways to show compliance
 - Enough time to install cost effective controls.



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Thank You!