

February 12, 2001

(AR-18J)

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management
Indiana Department of Environmental Management
100 North Senate Avenue
Post Office Box 6015
Indianapolis, Indiana 46206-6015

Dear Mr. Dubenetzky:

This letter is in response to your December 11, 2000, prevention of significant deterioration (PSD) applicability determination request for Lehigh Portland Cement Company in Mitchell, Indiana. Lehigh proposes to upgrade their existing electrostatic precipitators and associated particulate matter control devices on existing kilns #1 and #2. Your letter states that these upgrades are being performed to comply with the requirements of 40 CFR Part 63, subpart LLL, will not affect the kilns' design capacity or increase efficiency of the kilns, and will not result in any collateral increases in emissions from these units. These pollution control devices do not generate their own emissions. In addition, your staff has indicated that these modifications will not affect the utilization rates at these units. The United States Environmental Protection Agency agrees that these upgrades to pollution control equipment would not trigger PSD requirements.

We will continue to work with you and your staff to assure that the appropriate PSD determination is applied to this and other sources. If you have any questions, contact Sam Portanova, of my staff, at (312) 886-3189.

Sincerely yours,

/s/

Pamela Blakley, Chief
Permits and Grants Section (IL/IN/OH)