



KEYSTONE CEMENT COMPANY
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May 29, 2014

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Hand Delivered | Public Meeting Testimony

PA Environmental Quality Board
Rachel Carson State Office Building
16th Floor, 400 Market Street
Harrisburg, PA 17101-2301



**RE: Environmental Quality Board
Proposed Rulemaking
Additional RACT Requirements for Major Sources of NOx and VOCs
25 PA. Code Chs. 121 and 129**

Dear Sir/Madam:

As detailed on Page 2397 of the above-referenced Proposed Rulemaking, Keystone Cement Company (Keystone) is providing the following "one-page" summary of our comments to the Proposed Rulemaking. A separate letter, providing our detailed comments will be submitted under a separate cover prior to the close of the public comment period on June 30, 2014. In addition, we may augment and revise this letter if we have additional areas of comments beyond what is presented in this letter prior to the deadline.

- Keystone believes that the one year compliance schedule detailed at §129.97 is infeasible for the design, permitting, installation, and optimization of the NOx control devices that may be required to demonstrate compliance with the proposed RACT emission limitation for "pre-heater, pre-calciner" kilns. Based on the necessary actions, and their estimated time needed for completion, Keystone believes that a minimum compliance period of 30 months is necessary and appropriate for inclusion into the proposed RACT Rule.
- Similar to our comments above, Keystone believes that a one-year compliance schedule for implementing an alternative RACT NOx limitations is infeasible, especially in light of the fact that the alternative limitation may not be approved by the DEP until at least 6 months after the effective date of the Rule. Therefore, Keystone believes that §129.99 of the Proposed Rulemaking revised to include a compliance schedule defined as "within 30 months after approval of the alternative emissions limitation."

Any questions or requests for further information should be directed to the undersigned at (610) 837-1881, ext. 3213.

Sincerely,

Jeffery W. Smith, P.E.
Manager, Environmental Compliance

cc: Mr. Stephen P. Holt, P.E. (Keystone)

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