

From: Joan Gerhardt joan.gerhardt@behanc.com &
Subject: Lehigh CAP Update
Date: February 16, 2015 at 3:40 PM
To: Joan Gerhardt joan.gerhardt@behanc.com
Cc: Neil Hodgson neil.hodgson@hanson.biz, Tressa (Glens Falls) USA Jackson Tressa.Jackson@heidelbergcement.com, Jen (Glens Falls) USA Platt jen.platt@lehighhanson.com, John R (Glens Falls) USA Stephenson John.Stephenson@heidelbergcement.com



Neil asked that I forward this to you:

Dear members of Glens Falls Lehigh's Community Advisory Panel,

We have good news to share. Our plant, along with three others owned by Lehigh Hanson, has received the 2014 ENERGY STAR plant certification by the U.S. Environmental Protection Agency for superior energy performance. This certification -- the highest level of recognition granted by EPA -- is the distinguishing mark of energy efficiency for cement manufacturing plants in the United States and identifies plants that are among the most energy-efficient based on their performance in EPA's ENERGY STAR energy performance scale.

In addition, I'd like to introduce to you our new Human Resources Manager, Jen Platt, who came to us in November with over 20 years' experience in human resources. Jen is looking forward to meeting you and becoming an active member of the CAP.

Our 2015 business outlook is quite positive. There is good demand for our products and we are forecasting a near sell out for the next 10 months. However, we are facing some interesting developments in the marketplace. First, our closest competitor in Ravana is undergoing a \$300+ million renovation to its plant which will undoubtedly make their plant more efficient and cost effective. Second, the Canadian government is providing significant subsidies to help build a \$1.1 billion new cement factory in Quebec. The result could be artificially cheap cement flooding the U.S. market.

These recent developments again confirm our need to remain competitive in the global marketplace. The price of coal continues to be a challenge for us to achieve this goal. Therefore, we continue to evaluate better, more cost effective and environmentally friendly fuel alternatives that will keep us viable and financially competitive. Our discussions with DEC continue on this front and we anticipate moving forward with some testing of alternative fuels later this year. We will certainly provide more information as these details develop.

Finally, we continue to implement improvements at the plant to ensure compliance with EPA's revised, more stringent National Emission Standards for Hazardous Air Pollutants (NESHAP). Due to these activities, we are ahead of schedule for complying with EPA's standards, which must be implemented no later than September 2015.

I'll be back in touch to schedule the next CAP meeting. I'm targeting sometime in April or early May. Until then, if you have any questions, please don't hesitate to contact me or Joan. Thank you!

Best regards,

Neil Hodgson
Plant Manager - Glens Falls

Joan F. Gerhardt
Vice President and
Environmental and Risk Communication Practice Leader

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From: **Joan Gerhardt** joan.gerhardt@behancom.com
Subject: Re: Lehigh CAP Update
Date: July 6, 2015 at 12:31 PM
To: Tracy Frisch tracyf@fastermac.net
Bcc: Neil Hodgson neil.hodgson@hanson.biz

JG

Hi Tracy. Thanks for following up. We're sorry you were unable to be there.

The majority of the meeting was spent discussing the new NESHAP regulations, which take effect in September. As you know, this is the most challenging rule facing the U.S. cement industry because it significantly lowers emission limits of Hazardous Air Pollutants. The Glens Falls plant already has low concentrations and low emissions of HAPs. For some HAPs, we don't need to change operations or raw materials. Our largest decrease in emissions will result from particulate matter and mercury.

For particulate matter, our last stack testing indicated the plant is compliant and will be in compliance with the new NESHAP limits. We've made structural and internal repairs to the Electrostatic Precipitator, revised its controls, revised controls on the Clinker Cooler Baghouse and replaced tube sheets and the style of bag we were using. We also are in the process of modifying the Gas Conditioning Tower controls. We have a Continuous Parameter Monitoring System in place to demonstrate compliance, and will be performing annual stack tests.

For mercury, we installed a shuttling system to remove kiln dust from the Electrostatic Precipitator and Gas Conditioning Tower so the dust that was typically re-used in the kiln is now transported to finish mills and incorporated into the cement. This process is only needed when we use coal as the primary firing fuel. The system decreases the amount of mercury re-volatilized in gaseous emissions from the kiln. We installed a Mercury Sorbent Trap System on the kiln Electrostatic Precipitator to monitor compliance.

NESHAP also addresses dioxins/furans and Total Hydrocarbons. For dioxins/furans, there is no change to our emissions limits and monitoring. We continue to be in compliance. For Total Hydrocarbons, raw material monitoring and substitution will enable us to comply with the new standard.

Neil also introduced Jen Platt, the new human resources manager at Glens Falls, and informed the group that Tressa Jackson has taken another position in the company at a plant in California.

Finally, regarding alternate fuels, Neil said he continues to discuss options with DEC. We'll schedule a meeting with the CAP before any specific fuel is tested on-site.

Have a nice summer and enjoy that new car!
Joan

On Jul 3, 2015, at 12:51 PM, Tracy Frisch <tracyf@fastermac.net> wrote:

Hi Joan,

I want to apologize for not making the meeting. I was in the process of buying a used car out of town and it took longer than I could have predicted. (I had a 4:15 appointment in Glens Falls that I had to cancel.)

If you could fill me in a bit, I would appreciate it.

Thank you.

Happy 4th!
Tracy

On Feb 16, 2015, at 3:42 PM, Joan Gerhardt <joan.gerhardt@behancom.com> wrote:

Neil asked that I forward this to you:

Dear members of Glens Falls Lehigh's Community Advisory Panel,

We have good news to share. Our plant, along with three others owned by Lehigh Hanson, has received the 2014 ENERGY STAR plant certification by the U.S. Environmental Protection Agency for superior energy performance. This certification -- the highest level of recognition granted by EPA -- is the distinguishing mark of energy efficiency for cement manufacturing plants in the United States and identifies plants that are among the most energy-efficient based on their performance in EPA's ENERGY STAR energy performance scale.

From: **Rochow, Stefanie (Glens Falls) USA** Stefanie.Rochow@LehighHanson.com
Subject: An Update regarding Alternative Fuels, NOV, and the Title V Permit including NESHAP Standards
Date: April 7, 2016 at 5:01 PM
To: Peter Aust peter.l.aust@outlook.com, hksb26@icloud.com, mlnpawed@nycap.rr.com, Tracy Frisch tracyf@fastermac.net, jgodfrey@abewing.org, dcrete12803@yahoo.com, gitmo62@roaddrunner.com, pdpt@icloud.com
Cc: Hodgson, Neil (Glens Falls) USA Neil.Hodgson@hanson.biz, Joan Gerhardt joan.gerhardt@behancor.com, Stephenson, John R (Glens Falls) USA John.Stephenson@heidelbergcement.com, Platt, Jen (Glens Falls) USA Jen.Platt@Lehighhanson.com, Rochow, Stefanie (Glens Falls) USA Stefanie.Rochow@LehighHanson.com

SU

Dear CAP members:

As we discussed at our last meeting, we continue to evaluate the use of alternate fuels at our Glens Falls facility. We are now focusing on an alternative fuel produced by SGS Recovery LLC in Niagara Falls, NY. The material is similar to REFUEL in that it contains no PVCs, which would interfere with our process. It is manufactured from material recycled from paper mills, including plastic labels and film. All municipally-derived waste will be removed. We have received assurances from the manufacturer that the composition of the material will comply with our specifications; as you may recall, this is the issue we had previously with the REFUEL material.

While we continue to assess the SGS fuel's potential use at the Glens Falls facility, we have initiated discussions with NYSDEC regarding a trial of the SGS material. In order for that to occur, we must file a Beneficial Use Determination application with the state, which we are in the process of preparing. We will keep you apprised of the state's actions on the BUD application.

Should NYSDEC approve a trial of the SGS material, NYSDEC informed us that they will allow us to burn some natural gas during the test, along with predominantly coal and the new fuel. They have indicated, however, that should they accept the fuel, we must revert back to Phase 1 of the original trial protocol, which requires emissions stack testing. This will enable a comparison of the trial emissions results to periods when coal or natural gas is used. If NYSDEC approves the SGS BUD application, and authorizes us to conduct the trial, we will schedule a time for the test and will let you know when it will occur. Our plan is to schedule our next CAP meeting when trial data is received.

Finally, we wanted to let you know that the Notice of Violation issued by NYSDEC for the January test of REFUEL has been resolved. NYSDEC determined that no further action was warranted due to the fact that Lehigh is no longer considering the use of REFUEL as an alternative fuel.

On another front, as we have discussed at several of our meetings, EPA revised its National Emissions Standards for Hazardous Air Pollutants, or NESHAP, in February 2013. These modified standards are much more stringent than pre-existing standards, particularly with regard to mercury, total hydrocarbons and particulate matter. We have upgraded equipment at the plant to ensure compliance with the new standards.

Lehigh is required to incorporate the new NESHAP standards into its existing New York State Title V Air Permit. We have submitted an application to New York State to do just that. NYSDEC has not yet deemed the application to be complete and ready for its review. The Agency identified a Potential Environmental Justice Area to the north and west of our facility and asked us to develop a public involvement plan designed to engage residents in this area during the

permit review process. We are developing the plan, as requested, and will share it with you when we submit it to NYSDEC.

Regards,
Stefanie

Stefanie E. Rochow
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From: **Joan Gerhardt** joan.gerhardt@behancom.com 
Subject: Lehigh Community Advisory Panel Update
Date: June 21, 2016 at 3:35 PM
To: **Neil Hodgson** neil.hodgson@hanson.biz, **Stefanie (Glens Falls) USA** Rochow Stefanie.Rochow@LehighHanson.com, **John R (Glens Falls) USA** Stephenson John.Stephenson@heidelbergcement.com, **Jen (Glens Falls) USA** Platt jen.platt@lehighhanson.com

JG

Good afternoon.

As we have discussed, we are in the process of applying to the New York State Department of Environmental Conservation to renew our existing Title V Air Permit and incorporate more stringent air emissions standards into it. The new standards, referred to as NESHPAP, were established by the U.S. Environmental Protection Agency in 2013. Our application does not propose a new project, nor will Lehigh's current operations be modified as a result of this renewal.

Enclosed is a copy of the Full Environmental Assessment Form that we submitted to NYSDEC as part of our application.

We also have submitted to NYSDEC a draft Public Participation Plan aimed at engaging residents in a Potential Environmental Justice Area (PEJA) NYSDEC identified to the north and west of our facility. According to NYSDEC, this area meets one of the following criteria, based on recent census data:

- At least 51.1% of the population in an urban area that are reportedly members of a minority group; or
- At least 33.8% of the population in a rural area that are reportedly members of a minority group; or
- At least 23.59% of the population in an urban or rural area that have household incomes below the federal poverty levels.

The draft plan is enclosed here for your information. It recommends developing a project website to provide the public with information about the permit renewal application and establishment of an information repository at Crandall Library. It also relies on continuing engagement with the Community Advisory Panel and holding public meetings or informational sessions, as needed.

Please let us know if you have any questions about either of the enclosed documents.

Thank you!

Joan



Signed FEAf for EJ
2016.pdf



DECPPP-
GFLehigh_...062016.pdf

Joan Gerhardt

Vice President

BEHAN
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