PCA
America's Cement Manufacturers™

July 31, 2015

The Coordinator, Interim Secretariat of the Minamata Convention on Mercury
Chemicals Branch Division of Technology
Industry and Economics
United Nations Environment Programme
11 – 13 Chemin des Anemones, CH – 1219 Chatelaine
Geneva, Switzerland
Submitted via Electronic Mail to mercury.chemicals@unep.org

Dear Sir or Madam:

Re: Comment on "Draft Guidance on Cement Clinker Production Facilities", United Nations Environment Programme

The Portland Cement Association (PCA) today represents twenty-six (26) companies operating eighty-two (82) cement manufacturing plants in thirty-five (35) states located in the United States of America (USA), with distribution centers in all fifty (50) states. Members of the PCA account for approximately eighty percent (80%) of cement-making capacity in the USA.

The PCA appreciates the opportunity to provide comment on the subject draft guidance addressing cement clinker production facilities.

Members of the PCA are in the final stage of implementing measures to comply with the National Emission Standards for Hazardous Air Pollutants (NESHAP) for portland cement manufacturing facilities, and the NESHAP rule[1] mandates the implementation of maximum achievable control technology (MACT) to meet allowable emission limits. The implementation date for PC NESHAP compliance is September 9, 2015. The final amendments[2] to the rule were published on July 27, 2015.

The PCA respectfully recommends that the governing body make the following revision to the guidance.

1. The thirty-day (30-day) rolling average should be adopted as the standard averaging period for any mercury emissions limit to account for process variations for times when the raw mill is operating and when it is not operating. The EPA NESHAP limit for mercury is based on a thirty-day rolling average for this reason. Please consider including the following as a definition of "rolling average." *Rolling average* means the average of all data that meet QA/QC

[1] *Federal Register,* Vol. 78, No. 29, Environmental Protection Agency, 40 CFR Parts 60 and 63, National Emission Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants, Final Rule, February 12, 2013

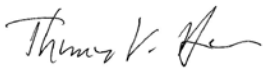
[2] *Federal Register,* Vol. 80, No. 143, Environmental Protection Agency, 40 CFR Parts 60 and 63, National Emission Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry and Standards of Performance for Portland Cement Plants, Final Rule, July 27, 2015

requirements or are otherwise normalized. The data must be collected during the applicable averaging period. The period of a rolling average stipulates the frequency of data averaging and reporting. A thirty-day rolling average period requires calculation of a new average value each day. Depending on the form of the limit, it shall include either the arithmetic average of all the hourly averages of mercury values (or other operating parameter) over the previous thirty operating days; or the arithmetic average of all the hourly average concentrations over the previous thirty operating days; or the total of the hourly mass emissions over the previous thirty operating days divided by the total production during the same periods.

Because the PCA was made aware of the opportunity to study and offer comments to the draft guidance for cement clinker on July 28, 2015, we respectfully request an additional ten (10) calendar days to analyze the document in order to determine if we can offer more substantial comments to assist in development of the final guidance.

Please feel free to email me, tharman@cement.org, at your convenience if you have questions.

Respectfully submitted,



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