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By Electronic Filing

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 Anémones, CH - 1219 Châtelaine, Geneva, Switzerland
E-mail: mercury.chemicals@unep.org

Re: Comments on Draft Cement Clinker Production Facilities Best Available Techniques and Best Environmental Practices Guidance Document Prepared for the Minamata Convention on Mercury

Dear Sir or Madam:

Titan America LLC submits these comments in response to the United Nations Environment Programme (UNEP) Expert Group of Minamata Convention Draft Cement Clinker Production Facilities Best Available Techniques and Best Environmental Practices (BAT/BEP) Guidance Document.

Titan America LLC is headquartered in Norfolk, Virginia and is one of the premier heavy building materials producers in the eastern United States. Titan America operations include cement plants, ready-mixed concrete plants, concrete block plants, quarries, import and rail terminals and fly ash beneficiation facilities.

Titan America's cement clinker production facilities are subject to very stringent regulations promulgated by the U.S. Environmental Protection Agency (USEPA) under either the *National Emission Standards for Hazardous Air Pollutants for the Portland Cement Manufacturing Industry* (PC MACT) at 40 CFR Part 63, Subpart LLL or *Commercial and Industrial Solid Waste Incineration* (CISWI) *Units:* at 40 CFR Part 60, Subpart DDDD. As such, these facilities will have very strict mercury emission limitations.

The draft BAT/BEP document provides an excellent overview of the mercury cycle and applicable controls. We provide the following general comments for the draft BAT/BEP guidance document for cement clinker production facilities:

1. Any mercury emission standards should be based on a long-term average (at least 30 days). As the mercury emissions during mill-down or upset conditions can be 10 times higher than those during normal operating (i.e., mill-on) conditions it is necessary to provide the longer averaging period to make the limit reasonably achievable. For cement plant emissions, the

levels of emission concentrations have potential longer-term impacts, and short-term or acute effects from short-term emissions would be insignificant. Therefore, the goal is for control or reduction of long-term emissions not daily emissions.

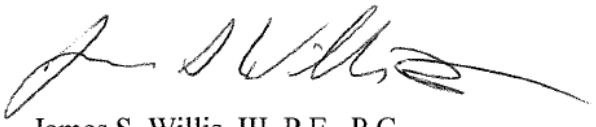
2. The Expert Group should be aware of the current issues the U.S. cement industry has experienced with mercury CEMS. Certification of mercury CEMS to U.S. Performance Specification PS-12A and span/calibration requirements in the NESHAP regulation have been very difficult to achieve. The issue appears to be problems with being able to calibrate for both relatively lower concentration mill-on conditions and much higher concentration mill-off conditions. The Portland Cement Association (PCA) submitted comments to the USEPA regarding these issues and those comments are accessible from the USEPA Docket (www.regulations.gov search document EPA-HQ-OAR-2011-0817-0861)

3. There should be no mandated pollution control technologies or methodologies for mercury emission reduction. The standards should be related to achievable emission levels and the technology or methodologies for achieving these standards should be determined by the subject facilities on a case-by-case basis. The costs for any particular technology and methodology will vary greatly and the cost information in the draft BAT/BEP document should be considered relative. For cost information in the draft BAT/BEP document to be meaningful consideration should be given to updating costs and normalizing all costs to the current year. For example, our recent experience with bag filters indicates that costs for a bag filter at a 1.2M mt per year facility would be $5-6 million per filter. The Draft BAT/BEP also did not include cost estimates for dust shuttling systems which based on our recent experience indicates costs of $0.5 to 1.5 million, depending on what equipment is necessary.

We appreciate the consideration of our comments. For more information related to these comments, please contact me at (540) 966-6534.

Respectfully,

Titan America LLC



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