



August 18, 2010

Project 011191003

Mr. Scott Lutz  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, California 94109

**Subject: Revisions to CEIR for 2008**  
Lehigh Southwest Cement Company  
Cupertino, California

Dear Mr. Lutz:

On behalf of Lehigh Southwest Cement Company (Permit No. A0017), AMEC Geomatrix Inc. (AMEC) is submitting revisions to the Comprehensive Emission Inventory Report (CEIR) for 2008. These revisions are in addition to those provided to Bay Area Air Quality Management District (BAAQMD) as an Appendix to the air modeling protocol.<sup>1</sup> The specific details regarding the revisions are provided in this letter. Appendix A presents the revised tables from the CEIR that were affected by these changes. The revised emission estimates as presented in Appendix A will be used as the basis for the human health risk assessment.

### **SOURCE TEST RESULTS – FINISH MILL SEPARATOR BAGHOUSES**

A source test for particulate emissions (grain loading rates) from two finish mill separator baghouses (6-DC-12/18 and 6-DC-19 ) was conducted at the Cupertino facility in June 2010. Prior to the source test, the modeling protocol specified that limits from permit conditions would be used to represent grain loading rates for these sources (0.006 grains per dry standard cubic feet per minute [gr/dscfm]). As shown in Table 1, based on the results of the source test, the grain loading rates were lower than the permit limits (0.0009 to 0.0012 gr/dscfm). The revised grain loading rates for these baghouses were used to update the CEIR (Appendix A) as shown on Table 1.

### **REVISION TO KILN EMISSION SUMMARY IN CEIR**

The summary of emissions from the kiln in the CEIR included emissions calculated based on production rates and laboratory analysis for metals summed with emissions based on source test results rather than referencing only one of these sources of information. The CEIR summary for metals has been revised to only include source test results in the calculation of emission rates. Based on a review of the modeling conducted by BAAQMD in January 2010, only emission rates based on source test results were used. The source test results also will be used for kiln emissions in the pending health risk assessment.

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<sup>1</sup> Air Quality Modeling Protocol – Lehigh Southwest Cement Company – Permit No. A0017, Cupertino, California, June 8, 2010.



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## SOURCES EVALUATED BASED ON PRODUCTION THROUGHPUT

Operating hours for ten dust collectors (1-DC-1, 1-DC-2, 1-DC-3, 1-DC-5, 2-DC-1, 2-DC-2, 2-DC-3, 3-DC-1, 3-DC-2, and 3-DC-3) were estimated using the ratio of clinker production rates for 2005 and 2008 and the known operating hours for 2008. The production rates were reported in the CEIR for 2005 in short tons and for 2008 in metric tons. However, the production ratio was incorrectly calculated because the unit conversion factor used in the calculations had two digits transposed (1.0123 instead of 1.1023 short tons/metric tons). Therefore the ratio of 1.78 used in the 2008 CEIR was updated to 1.63 in this addendum.

We are in the process of completing the human health risk assessment and would appreciate any comments you may have regarding these revisions as soon as possible.

Sincerely yours,  
AMEC Geomatrix, Inc.

Caryn Kelly  
Senior Toxicologist

Ann Holbrow Verwiel  
Senior Toxicologist

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Attachments: Table 1: Results of June 2010 Finish Mill Source Tests and Reduction in  
Estimated PM10 Emissions  
Appendix A Revised CEIR Tables

cc: Scott A. Renfrew, Lehigh Southwest Cement Company  
Heinrich Wesseling, Lehigh Southwest Cement Company  
Robert Hull, Bay Area Air Quality Management District

**TABLE 1  
RESULTS OF JUNE 2010 FINISH MILL SOURCE TESTS AND REDUCTION IN ESTIMATED PM10 EMISSIONS**

Lehigh Southwest Cement Company  
Cupertino Facility

Reference for Emission Factor	BAAQMD Permit #	Plant ID	Description	Stack Flow (dscfm)	Grain Loading (gr/dscfm)	Hourly Emissions (lb/hr)	Yearly Operating Hours - 2005 (hrs/yr)	Yearly PM10 Emissions (tons/yr)
Permit <sup>1</sup>	A-211	6-DC-12/18	Dust Collector for 6-GM-2 Air Separator (6-SE-2)	80000	0.006	4.11	5248	10.8
June 25, 2010 Source test				80000	0.0012	0.82	5248	2.16
Permit <sup>1</sup>	A-218	6-DC-19	Dust Collector for 6-GM-1 Air Separator (6-SE-1)	150000	0.006	7.71	6772	26.1
June 25, 2010 Source test				150000	0.0009	1.16	6772	3.92

Notes:

1. As reported in Revised 2008 CEIR Addendum (June 8, 2010) in Appendix A of Air Quality Modeling Protocol (AMEC, 2010).

**APPENDIX A  
REVISED TABLE 6A**

**DUST COLLECTOR EMISSIONS FOR CEMENT BAGHOUSES**  
Lehigh Southwest Cement Company  
Cupertino Facility

BAAQMD Permit #	Plant ID	Description	Material <sup>1</sup>	Stack Flow (dscfm)	Grain Loading (gr/dscfm)	Hourly Emissions (lb/hr)	Yearly Operating Hours <sup>2,3</sup> (hrs/yr)	Yearly Emissions (tons/yr)
A-10	6-DC-45-48	Dust Collector - KCC design 32,000 cfm (inactive per SR)	Clinker	32,000	0.01	0.00	0	0.00E+00
A-13	6-DC-1	Dust Collector - Reese 4 unit x 49 Bags	Clinker	15,000	0.01	1.29	5459	3.51E+00
A-58	7-DC-8	Dust Collector - MAC Model 144LST64, 5000 ACFM	Cement	5,000	0.01	0.43	6119	1.31E+00
A-111	1-DC-1	Dust Collector - DCA Volks - 2,000 cfm	Additive	2,000	0.01	0.17	4382	3.76E-01
A-112	1-DC-2	Dust Collector - DCA Volks - 2,000 cfm	Additive	2,000	0.01	0.17	2647	2.27E-01
A-113	1-DC-3	Dust Collector - Mikro-Pulsaire Model 100S-8-20 4,000 cfm	Additive	4,000	0.01	0.34	2284	3.92E-01
A-114 <sup>4</sup>	1-DC-4	Dust Collector - Mikro-Pulsaire Model 1F3 8,000 cfm	Additive	8,000	0.01	0.69	6589	2.26E+00
A-115	1-DC-5	Dust Collector - DCA Volks - 2,000 cfm	Additive	2,000	0.01	0.17	4382	3.76E-01
A-121	2-DC-1	Dust Collector - Mikro-Pulsaire Model 1F5 16,000 cfm	56% High Grade 44% Mid Grade	16,000	0.01	1.37	5727	3.93E+00
A-122	2-DC-2	Dust Collector - DCA Volks - 2,000 cfm	56% High Grade 44% Mid Grade	2,000	0.01	0.17	6369	5.46E-01
A-123	2-DC-3	Dust Collector - DCA Volks - 2,000 cfm	56% High Grade 44% Mid Grade	2,000	0.01	0.17	6457	5.53E-01
A-131	3-DC-1	Dust Collector - Mikro-Pulsaire Model 1F2 6,000 cfm	56% High Grade 44% Mid Grade	6,000	0.01	0.51	7046	1.81E+00
A-132	3-DC-2	Dust Collector - Mikro-Pulsaire Model 100S-8-20 4,000 cfm	5% Additive 53% High Grade 42% Mid Grade	4,000	0.01	0.34	5936	1.02E+00
A-133	3-DC-3	Dust Collector - Mikro-Pulsaire Model 100S-8-20 4,000 cfm	5% Additive 53% High Grade 42% Mid Grade	4,000	0.01	0.34	3779	6.48E-01
A-134	3-DC-4	Dust Collector - Mikro-Pulsaire Model 1F3 8,000 cfm	5% Additive 95% All Grade Limestone	8,000	0.01	0.69	5310	1.82E+00
A-135	3-DC-5	Dust Collector - Mikro-Pulsaire Model 1F3 8,000 cfm	High Grade Limestone	8,000	0.01	0.69	5383	1.85E+00
A-141 <sup>6</sup>	4-DC-7/22	Dust Collector - Kaiser Design 180,000 cfm	5% Additive 53% High Grade 42% Mid Grade	180,000	--	--	6897	--
A-142 <sup>6</sup>	4-DC-23/38	Dust Collector - Kaiser Design 180,000 cfm	5% Additive 53% High Grade 42% Mid Grade	180,000	--	--	6897	--
A-143	4-DC-3	Dust Collector - Mikro-Pulsaire Model 1F3 10,000 cfm	5% Additive 53% High Grade 42% Mid Grade	10,000	0.01	0.86	5309	2.28E+00
A-144	4-DC-4	Dust Collector - Mikro-Pulsaire Model 1F3 10,000 cfm	5% Additive 53% High Grade 42% Mid Grade	10,000	0.01	0.86	5417	2.32E+00
A-151	5-DC-1	Dust Collector - Mikro-Pulsaire Model 1F3 10,000 cfm	5% Additive 53% High Grade 42% Mid Grade	10,000	0.01	0.86	6897	2.96E+00

**Revisions to CEIR Addendum  
August 18, 2010**

**APPENDIX A  
REVISED TABLE 6A**

**DUST COLLECTOR EMISSIONS FOR CEMENT BAGHOUSES**  
Lehigh Southwest Cement Company  
Cupertino Facility

BAAQMD Permit #	Plant ID	Description	Material <sup>1</sup>	Stack Flow (dscfm)	Grain Loading (gr/dscfm)	Hourly Emissions (lb/hr)	Yearly Operating Hours <sup>2,3</sup> (hrs/yr)	Yearly Emissions (tons/yr)
A-152	5-DC-2	Dust Collector - Mikro-Pulsaire Model 1F3 10,000 cfm	5% Additive 53% High Grade 42% Mid Grade	10,000	0.01	0.86	6897	2.96E+00
A-153	5-DC-3	Dust Collector - Mikro-Pulsaire Model 2G3 18,000 cfm	5% Additive 53% High Grade 42% Mid Grade	18,000	0.01	1.54	6897	5.32E+00
A-161 <sup>5</sup>	5-DC-11/20	Dust Collector - Kaiser Design glass bag 135,000 cfm	Clinker	135,000	0.004	4.93	6897	1.70E+01
A-162	5-DC-24	Dust Collector - Mikro-Pulsaire Model 100S-8-20 4,000 cfm	Clinker	4,000	0.01	0.34	4724	8.10E-01
A-163	5-DC-25	Dust Collector - Mikro-Pulsaire Model 1F3 8,000 cfm	Clinker	8,000	0.01	0.69	2041	7.00E-01
A-164	5-DC-23	Dust Collector - Mikro-Pulsaire Model 1F3 10,000 cfm	Clinker	10,000	0.01	0.86	6897	2.96E+00
A-165	5-DC-27/28	Dust Collector - Mikro-Pulsaire Model 1F3 8,000 cfm	Clinker	8,000	0.01	0.69	4530	1.55E+00
A-166		Dust Collector DC144-10 Pulse Jet (Inactive)	--	--	--	--	--	--
A-171	5-DC-5	Baghouse, Pulse Jet Dust Collector - Mikro-Pulsaire Model 2D5 24,000 cfm	Coke	24,000	0.016	3.30	6837	1.13E+01
A-172	5-DC-6	Baghouse, Pulse Jet Dust Collector - Mikro-Pulsaire Model 2D5 24,000 cfm	Coke	24,000	0.016	3.30	6753	1.11E+01
A-174	5-DC-29	Pre-Caliner Coke System (Inactive)	--	--	--	--	--	--
A-175	5-DC-26	Dust Collector - DCE Vokes Model DLM - V45/15F 2,200 cfm (Inactive)	--	--	--	--	--	--
A-190 <sup>5</sup>	5-DC-90	Clinker Cooler Dust Collectors - Kaiser Design 7,000 cfm	Clinker	7,000	0.005	0.27	6897	9.31E-01
A-203	8-DC-3	Dust Collector - DLM Model V10/10 w/5HP Blower (Inactive)	--	--	--	--	--	--
A-210	6-DC-17	Dust Collector (6-D-1) - Carter Day Model 376RF10 Clamshell 20,000 cfm	Cement	20,000	0.006	1.03	6772	3.48E+00
A-211	6-DC-12/18	Dust Collector (6-D-1) - Carter Day -4- Model 376RF10 80,000 cfm	Cement	80,000	0.0012	0.82	5248	2.16E+00
A-214	8-DC-2	Dust Collector - DCE Vokes Model DLM - V10/10 1,000 cfm (Inactive)	--	--	--	--	--	--
A-215	8-DC-1	Dust Collector - DLM Model V10/10 w/5HP Blower (Inactive)	--	--	--	--	--	--
A-216	6-DC-13	Dust Collector - DCE Vokes DLM - v9/15 Type F, 875 CFM-(F1)	Clinker	875	0.0013	0.01	6772	3.30E-02
A-217	6-DC-15	Dust Collector - DCE Vokes DLM - v9/15 Type F, 875 CFM-(F1)	Clinker	875	0.0013	0.01	6772	3.30E-02
A-218	6-DC-19	Dust Collector - Mikro-Pulsaire Model 2-1200T-12 150,000 ACFM	Cement	150,000	0.0009	1.16	6772	3.92E+00
A-220	6-DC-8	Dust Collector - Mikro-Pulsaire Model 289S/10, 17000 ACFM	Cement	17,000	0.006	0.87	5248	2.29E+00
A-221	6-DC-6	Dust Collector - DCE Vokes Model DLM-V14/7 Type F, 1325 ACFM-(F2)	Clinker	1,325	0.0013	0.01	5249	3.87E-02
A-222	6-DC-4	Dust Collector - DCE sintamatic 1200 acfm-(f2)	Natural Gypsum	1,200	0.0013	0.01	5249	3.51E-02
A-230	6-DC-2	Dust Collector - Mikro-Pulsaire Model 289S/10, 15000 ACFM	Cement	15,000	0.01	1.29	5459	3.51E+00
A-231	6-DC-3	Dust Collector - DCE Vokes DLM - v14/7 Type F, 1200 CFM-(F2)	Clinker	1,200	0.0013	0.01	5459	3.65E-02
A-240	6-DC-21	Dust Collector - DCE sintamatic 1000 acfm-(f3)	5% Slag 6% Pozzolan 36% All Grade Limestone 53% Natural Gypsum	1,000	0.0013	0.01	367	2.04E-03
A-242	6-DC-11	Dust Collector - DCE Vokes Model DLM-V18/15, Type f, 1500 acfm-(f3)	Cement	1,500	0.0013	0.02	6772	5.66E-02
A-243	6-DC-5	Dust Collector - DCE sintamatic 1675 acfm-(f3) (Inactive)	--	--	--	--	--	--
A-244	6-DC-7	Dust Collector - DCE sintamatic 1550 acfm-(f3)	Pozzolan	1,550	0.0013	0.02	356	3.07E-03
A-245	6-DC-9	Dust Collector - DCE sintamatic 1550 acfm-(f3)	Natural Gypsum	1,550	0.0013	0.02	6772	5.85E-02
A-301	7-DC-9	Rail Loadout Dust Collector	Cement	1,500	0.01	0.13	578	3.72E-02
A-400		Dust Collector - DC49 - DCE Vokes DLM v15/15F - 3 hp (Inactive)	--	--	--	--	--	--
A-414	6-DC-25	Dust Collector - Kiln Dust Additive Bin	Synthetic Gypsum	3,500	0.0013	0.04	4580	8.93E-02

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August 18, 2010**

APPENDIX A  
REVISED TABLE 6A

DUST COLLECTOR EMISSIONS FOR CEMENT BAGHOUSES  
Lehigh Southwest Cement Company  
Cupertino Facility

BAAQMD Permit #	Plant ID	Description	Material <sup>1</sup>	Stack Flow (dscfm)	Grain Loading (gr/dscfm)	Hourly Emissions (lb/hr)	Yearly Operating Hours <sup>2,3</sup> (hrs/yr)	Yearly Emissions (tons/yr)
A-415		Dust Collector (Inactive)	--	--	--	--	--	--
A-420	7-DC-16	Dust Collector - DCL, CD049-84, 2,000 ACFM	Cement	2,000	0.006	0.10	6119	3.15E-01
A-421	7-DC-17	Dust Collector - DCL, CD049-84, 2,000 ACFM	Cement	2,000	0.006	0.10	6119	3.15E-01
A-422	7-DC-18	Dust Collector - DCL, CFM330, 2,400 ACFM	Cement	2,400	0.006	0.12	6119	3.78E-01
A-423	7-DC-12	Dust Collector - DCL, CD049-84, 2,000 ACFM	Cement	2,000	0.006	0.10	6119	3.15E-01
A-424	7-DC-14	Dust Collector - DCL, CFM330, 2,400 ACFM	Cement	2,400	0.006	0.12	6119	3.78E-01
A-425	7-DC-13	Dust Collector - DCL, CD049-84, 2,000 ACFM	Cement	2,000	0.006	0.10	6119	3.15E-01
A-426	7-DC-15	Dust Collector - DCL, CFM330, 2,400 ACFM	Cement	2,400	0.006	0.12	6119	3.78E-01
A-427	7-DC-19	Dust Collector - US Air Filtration 2110-CKPT-96-5, 8,300 ACFM	Cement	8,300	0.006	0.43	6119	1.31E+00
A-428	7-DC-11	Dust Collector - Fuller/Dracco Type A, 6,100 ACFM	Cement	6,100	0.006	0.31	6119	9.60E-01
A-429	7-DC-10	Dust Collector - Fuller/Dracco Type A, 8,300 ACFM	Cement	8,300	0.006	0.43	6119	1.31E+00
A-430	7-PDC-1	Dust Collector - BHA Pulse Jet Baghouse Conversion 8,000 ACFM	Cement	8,000	0.006	0.41	982	2.02E-01
A-431	7-PDC-2	Dust Collector - BHA Pulse Jet Baghouse Conversion 8,000 ACFM	Cement	8,000	0.006	0.41	523	1.08E-01
A-432	7-PDC-3	Dust Collector - BHA Pulse Jet Baghouse Conversion (Inactive)	--	--	--	--	--	--
A-433	7-DC-5	Dust Collector - US Air Filtration 1010-PT-96-5, 4000 ACFM	Cement	4,000	0.006	0.21	6772	6.97E-01
A-434	7-DC-6	Dust Collector - US Air Filtration 1010-PT-96-5, 4000 ACFM	Cement	4,000	0.006	0.21	6772	6.97E-01
A-435	7-DC-7	Dust Collector - US Air Filtration 2110-CKPT-96-5, 10,000 ACFM	Cement	10,000	0.006	0.51	6772	1.74E+00
A-436	6-DC-49	Dust Collector - DCE Vokes DLM-V15/lff 4000acfm	Clinker	4,000	0.006	0.21	4712	4.85E-01
A-441	8-DC-4	Dust Collector (Inactive)	--	--	--	--	--	--
A-442	8-DC-5	Dust Collector (Inactive)	--	--	--	--	--	--
A-447	6-DC-51	Dust Collector (Inactive)	--	--	--	--	--	--
A-448	6-DC52	Dust Collector (Inactive)	--	--	--	--	--	--
A-449	6-DC-53	Dust Collector (Inactive)	--	--	--	--	--	--
A-450	6-DC-54	Dust Collector (Inactive)	--	--	--	--	--	--
A-451	7-PDC-4	Dust Collector (Inactive)	--	--	--	--	--	--
<b>Total:</b>						3.62E+01		1.09E+02

Default Grain

Loading: 0.01 gr/dscfm  
777130 metric tons of clinker in 2008 (from Scott Renfrew)  
1399692 tons of clinker in 2005  
1.634 2005/2008 production ratio  
2000 lb=ton

Notes:

- For sources handling a combination of process materials, percentages were calculated based on 2005 production reports
- Operating hours based on 2005 NESHAP report. Operating hours for A-13 provided by Scott Renfrew.
- Operating hours for A-111 through 133 not in NESHAP report. Hours provided from 2008 and then calculated 2005 hours by taking the ratio of clinker production from 2005 and 2008.
- Dust collector A-114 used operating hours from 2008
- Dust collectors for the clinker cooler (A-161, 190) used PM10 emissions (lb/hr) from source testing, 2007 Emissions Test Report, Revision II, Table 6-1
- The kiln dust collectors (A-141 and A-142) are listed with no particulate emissions because they are already quantified using emission source testing in Table A-4A of the 2008 CEIR.

Revisions to CEIR Addendum  
August 18, 2010

**APPENDIX A**  
**TABLE S-2**  
**REVISED FACILITY ANNUAL EMISSIONS SUMMARY**  
Lehigh Southwest Cement Company  
Cupertino Facility

Pollutant <sup>1</sup>	Chemical Group	Kiln	DC-Cement	DC-Rock	PF-Cement	PF-Crushing and Screening	PF-Rock Plant	Dispensing Facilities	Emergency Diesel Generators	Welding Stationary IC Engines	Unpaved Roads Wind Erosion	Paved/Unpaved Roads Dust Entrainment	Stockpile Wind Erosion	Stockpile Material Handling	Mine MF10 <sup>2</sup>	Mine MF24 <sup>3</sup>	Total (tons or lbs/yr)
CO	Criteria Pollutant	1155.25							0.07	0.31							1.16E+03
NOx	Criteria Pollutant	1941.51							0.26	0.12							1.94E+03
PM10	Criteria Pollutant	9.79	108.50	3.35	19.52	17.94	9.85				13.02	13.71	4.08	0.59	31.83	8.38	2.41E+02
SOx	Criteria Pollutant	235.53							0.00	0.01							2.36E+02
VOC	Criteria Pollutant	287.88							0.01	0.02							2.88E+02
Diesel PM	Other TAC								9.42	15.32							2.47E+01
Gasoline PM	PM									0.9301							9.30E-01
Antimony	Metals	6.78E-01	6.34E-01	1.68E-02	1.03E-01	8.97E-02	5.04E-02				6.51E-02	6.86E-02	2.13E-02	3.02E-03	1.59E-01	4.19E-02	1.93E+00
Arsenic	Metals	7.60E-01	9.24E-01	8.38E-03	1.86E-01	1.07E-01	2.52E-02				3.25E-02	8.11E-02	1.33E-02	2.05E-03	1.19E-01	4.16E-02	2.30E+00
Barium	Metals	9.81E+00	2.04E+02	5.23E+00	4.92E+01	4.11E+01	1.57E+01				2.60E+01	2.98E+01	5.24E+00	7.08E-01	6.61E+01	1.48E+01	4.68E+02
Beryllium	Metals	3.80E-01	1.70E-01	5.03E-03	2.70E-02	2.69E-02	1.51E-02				1.95E-02	2.06E-02	9.99E-03	9.14E-04	4.77E-02	1.26E-02	7.35E-01
Cadmium	Metals	3.80E-01	3.18E-01	8.38E-03	6.58E-02	5.79E-02	2.52E-02				3.25E-02	3.43E-02	1.10E-02	1.93E-03	7.96E-02	2.09E-02	1.04E+00
Total Chromium	Metals	5.55E+00	1.03E+01	1.61E-01	1.66E+00	1.07E+00	4.84E-01				1.07E+00	1.14E+00	1.91E-01	2.58E-02	1.63E+00	4.08E-01	2.37E+01
Cobalt	Metals	1.75E+00	1.46E+00	4.29E-02	2.25E-01	2.02E-01	1.29E-01				2.55E-01	2.30E-01	4.90E-02	6.62E-03	4.93E-01	1.14E-01	4.96E+00
Copper	Metals	4.24E+00	4.97E+00	9.39E-02	1.25E+00	8.84E-01	2.82E-01				6.42E-01	7.80E-01	1.10E-01	2.08E-02	1.45E+00	3.95E-01	1.51E+01
Lead	Metals	8.86E-01	5.77E-01	8.72E-03	9.47E-02	5.69E-02	2.62E-02				5.99E-02	1.13E-01	1.24E-02	1.74E-03	7.96E-02	2.09E-02	1.94E+00
Manganese	Metals	3.99E+00	--	--	--	--	--				--	--	--	--	--	--	3.99E+00
Mercury	Metals	5.81E+02	1.97E-01	1.34E-03	6.38E-02	9.63E-03	4.03E-03				3.65E-03	4.56E-03	2.39E-03	2.58E-04	1.83E-02	4.77E-03	5.82E+02
Molybdenum	Metals	1.29E+01	1.85E+00	1.68E-02	2.41E-01	1.59E-01	5.04E-02				6.51E-02	1.33E-01	2.32E-02	3.06E-03	1.59E-01	4.19E-02	1.57E+01
Nickel	Metals	6.53E+00	3.38E+01	1.54E-01	2.44E+00	1.21E+00	4.63E-01				1.40E+00	2.37E+00	2.56E-01	3.18E-02	2.56E+00	6.14E-01	5.19E+01
Phosphorous	Metals	7.37E+01	--	--	--	--	--				--	--	--	--	--	--	7.37E+01
Selenium	Metals	4.25E+00	5.65E-01	1.68E-02	9.87E-02	8.97E-02	5.04E-02				6.51E-02	1.45E-02	2.07E-02	2.97E-03	1.59E-01	4.19E-02	5.38E+00
Silver	Metals	7.39E-01	2.83E-01	8.72E-03	4.94E-02	4.57E-02	2.62E-02				3.25E-02	3.43E-02	1.07E-02	1.53E-03	7.96E-02	2.09E-02	1.33E+00
Thallium	Metals	4.25E+00	5.80E+00	8.72E-03	2.63E+00	1.15E-01	2.62E-02				3.25E-02	3.43E-02	1.13E-02	1.65E-03	7.96E-02	2.09E-02	1.30E+01
Vanadium	Metals	3.80E+00	1.15E+02	1.27E-01	1.04E+01	4.07E+00	3.83E-01				2.17E+00	7.01E+00	5.31E-01	9.08E-02	2.81E+00	8.57E-01	1.47E+02
Zinc	Metals	5.14E+01	1.29E+01	1.68E-01	3.73E+00	2.58E+00	5.04E-01				8.85E-01	1.68E+00	2.34E-01	4.64E-02	2.32E+00	7.96E-01	7.72E+01
Chromium (VI)	Metals	3.36E-01	1.61E+00	6.71E-04	1.32E-01	1.06E-02	2.01E-03				4.95E-02	4.49E-02	9.24E-04	1.45E-04	6.37E-03	1.68E-03	2.19E+00
Total Crystalline Silica	Other TAC	--	7.28E+01	2.49E+01	3.17E+01	8.69E+01	7.48E+01				1.85E+02	8.01E+01	2.47E+01	4.11E+00	3.79E+02	8.08E+01	1.04E+03
Naphthalene	PAH's	1.39E+02															1.39E+02
2-Methyl naphthalene	PAH's	1.13E+02															1.13E+02
Acenaphthylene	PAH's	1.15E+00															1.15E+00
Acenaphthene	PAH's	1.77E-01															1.77E-01
Fluorene	PAH's	1.65E+01															1.65E+01
Phenanthrene	PAH's	9.17E+01															9.17E+01
Anthracene	PAH's	6.17E-01															6.17E-01
Fluoranthene	PAH's	1.57E+00															1.57E+00
Pyrene	PAH's	1.17E+00															1.17E+00
Benz[a]anthracene	PAH's	1.31E-02															1.31E-02
Chrysene	PAH's	3.86E-02															3.86E-02
Benzo[b]fluoranthene	PAH's	1.87E-03															1.87E-03
Benzo[k]fluoranthene	PAH's	2.95E-04															2.95E-04
Benzo[e]pyrene	PAH's	1.37E-03															1.37E-03
Benzo[a]pyrene	PAH's	2.95E-04															2.95E-04
Perylene	PAH's	2.95E-04															2.95E-04
Indeno[1,2,3-c,d]pyrene	PAH's	2.19E-04															2.19E-04
Dibenzo[a,h]anthracene	PAH's	2.95E-04															2.95E-04
Benzo[g,h,i]perylene	PAH's	2.95E-04															2.95E-04
1,2,3,4,6,7,8-HpCDD	PCDD/PCDF	9.63E-06															9.63E-06
1,2,3,4,6,7,8-HpCDF	PCDD/PCDF	4.67E-06															4.67E-06
1,2,3,4,7,8,9-HpCDF	PCDD/PCDF	1.20E-06															1.20E-06
1,2,3,4,7,8-HxCDD	PCDD/PCDF	2.69E-06															2.69E-06
1,2,3,4,7,8-HxCDF	PCDD/PCDF	4.07E-06															4.07E-06
1,2,3,6,7,8-HxCDD	PCDD/PCDF	2.65E-06															2.65E-06
1,2,3,6,7,8-HxCDF	PCDD/PCDF	3.81E-06															3.81E-06

**APPENDIX A**  
**TABLE S-2**  
**REVISED FACILITY ANNUAL EMISSIONS SUMMARY**  
Lehigh Southwest Cement Company  
Cupertino Facility

Pollutant <sup>1</sup>	Chemical Group	Kiln	DC-Cement	DC-Rock	PF-Cement	PF-Crushing and Screening	PF-Rock Plant	Dispensing Facilities	Emergency Diesel Generators	Welding Stationary IC Engines	Unpaved Roads Wind Erosion	Paved/Unpaved Roads Dust Entrainment	Stockpile Wind Erosion	Stockpile Material Handling	Mine MF10 <sup>2</sup>	Mine MF24 <sup>3</sup>	Total (tons or lbs/yr)
1,2,3,7,8,9-HxCDD	PCDD/PCDF	2.75E-06															2.75E-06
1,2,3,7,8,9-HxCDF	PCDD/PCDF	1.28E-06															1.28E-06
1,2,3,7,8-PeCDD	PCDD/PCDF	2.37E-06															2.37E-06
1,2,3,7,8-PeCDF	PCDD/PCDF	1.83E-05															1.83E-05
2,3,4,6,7,8-HxCDF	PCDD/PCDF	2.34E-06															2.34E-06
2,3,4,7,8-PeCDF	PCDD/PCDF	2.74E-05															2.74E-05
2,3,7,8-TCDD	PCDD/PCDF	2.33E-06															2.33E-06
2,3,7,8-TCDF	PCDD/PCDF	1.15E-04															1.15E-04
HpCDD (Total)	PCDD/PCDF	1.51E-05															1.51E-05
HpCDF (Total)	PCDD/PCDF	4.75E-06															4.75E-06
HxCDD (Total)	PCDD/PCDF	6.71E-05															6.71E-05
HxCDF (Total)	PCDD/PCDF	2.34E-05															2.34E-05
OCDD	PCDD/PCDF	2.02E-05															2.02E-05
OCDF	PCDD/PCDF	4.61E-06															4.61E-06
PeCDD (Total)	PCDD/PCDF	7.18E-05															7.18E-05
PeCDF (Total)	PCDD/PCDF	7.01E-04															7.01E-04
TCDD (Total)	PCDD/PCDF	1.91E-04															1.91E-04
TCDF (Total)	PCDD/PCDF	1.31E-02															1.31E-02
1,1,1-trichloroethane	TAC	3.21E+01															3.21E+01
1,1,2,2-tetrachloroethane	TAC	4.03E+01															4.03E+01
1,1,2-trichloroethane	TAC	5.34E+01															5.34E+01
1,1-dichloroethane	TAC	1.98E+01															1.98E+01
1,1-dichloroethylene	TAC	3.89E+01															3.89E+01
1,2,4-trichlorobenzene	TAC	1.09E+02															1.09E+02
1,2,4-trimethylbenzene	TAC	1.38E+03															1.38E+03
1,2-dibromoethane	TAC	6.02E+01															6.02E+01
1,2-dichloroethane	TAC	2.38E+01															2.38E+01
1,2-dichloropropane	TAC	2.71E+01															2.71E+01
1,3,5-trimethylbenzene	TAC	1.13E+03															1.13E+03
1,3-butadiene	TAC	9.18E+01															9.18E+01
4-ethyl-toluene	TAC	4.30E+02															4.30E+02
Acrolein	TAC	4.49E+01															4.49E+01
Benzene	TAC	9.65E+03						9.24E-03									9.65E+03
Benzyl chloride	TAC	1.01E+02															1.01E+02
c-1,2-dichloroethene	TAC	3.89E+01															3.89E+01
c-1,3-dichloropropene	TAC	6.67E+01															6.67E+01
Carbon Tetrachloride	TAC	6.16E+01															6.16E+01
Chlorobenzene	TAC	5.54E+02															5.54E+02
Chloroform	TAC	2.87E+01															2.87E+01
Dichloromethane	TAC	1.29E+02															1.29E+02
Ethyl Chloride	TAC	3.87E+01															3.87E+01
Ethylbenzene	TAC	9.59E+02															9.59E+02
Freon 11	TAC	3.30E+01															3.30E+01
Freon 113	TAC	4.50E+01															4.50E+01
Freon 114	TAC	4.11E+01															4.11E+01
Freon 12	TAC	2.42E+01															2.42E+01
Hexachlorobutadiene	TAC	1.05E+02															1.05E+02
m+p-xylenes	TAC	6.94E+03						4.06E-05									6.94E+03
m-dichlorobenzene	TAC	4.71E+01															4.71E+01
Methyl Bromide	TAC	6.25E+02															6.25E+02
Methyl Chloride	TAC	1.10E+03															1.10E+03
o-dichlorobenzene	TAC	4.71E+01															4.71E+01
o-xylene	TAC	1.36E+03															1.36E+03
p-dichlorobenzene	TAC	5.89E+01															5.89E+01
Perchloroethylene	TAC	5.31E+01															5.31E+01



**APPENDIX A**  
**TABLE S-2**  
**REVISED FACILITY ANNUAL EMISSIONS SUMMARY**  
Lehigh Southwest Cement Company  
Cupertino Facility

Pollutant <sup>1</sup>	Chemical Group	Kiln	DC-Cement	DC-Rock	PF-Cement	PF-Crushing and Screening	PF-Rock Plant	Dispensing Facilities	Emergency Diesel Generators	Welding Stationary IC Engines	Unpaved Roads Wind Erosion	Paved/Unpaved Roads Dust Entrainment	Stockpile Wind Erosion	Stockpile Material Handling	Mine MF10 <sup>2</sup>	Mine MF24 <sup>3</sup>	Total (tons or lbs/yr)
Styrene	TAC	2.43E+02															2.43E+02
t-1,3-dichloropropene	TAC	4.44E+01															4.44E+01
Toluene	TAC	8.65E+03						4.13E-02									8.65E+03
Trichloroethene	TAC	4.21E+01															4.21E+01
Vinyl Chloride	TAC	1.42E+02															1.42E+02
Hydrogen Chloride	Other	1.07E+05															1.07E+05
Acetaldehyde	Volatile Organics	1.16E+03															1.16E+03
Formaldehyde	Volatile Organics	6.31E+01															6.31E+01

Notes

1. Criteria Pollutant reported in tons/yr. All other pollutants reported in lbs/yr.
2. MF10 are mine fugitives emissions occurring over 10 hours per day (operating hours).
3. MF24 are mine fugitive emissions occurring 24 hours per day.

**APPENDIX A**  
**TABLE S-3**  
**REVISED FACILITY HOURLY EMISSIONS SUMMARY**  
Lehigh Southwest Cement Company  
Cupertino Facility

Pollutant	Chemical Group	Kiln	DC-Cement	DC-Rock	PF-Cement	PF-Crushing and Screening	PF-Rock Plant	Dispensing Facilities	Emergency Diesel Generators	Welding Stationary IC Engines	Unpaved Roads Wind Erosion	Paved/Unpaved Roads Dust Entrainment	Stockpile Wind Erosion	Stockpile Material Handling	Mines MF10 <sup>2</sup>	Mines MF24 <sup>3</sup>	Total (lb/hr) <sup>1</sup>
CO	Criteria Pollutant	335.00							13.31	5.89							3.54E+02
NOx	Criteria Pollutant	563.00							50.11	1.21							6.14E+02
PM10	Criteria Pollutant	2.84	36.25	1.97	16.32	11.66	13.03				10.42	10.97	3.27	0.47	25.47	6.70	1.39E+02
SOx	Criteria Pollutant	68.30							0.02	0.08							6.84E+01
VOC	Criteria Pollutant	83.48							1.41	0.37							8.53E+01
Diesel PM	Other TAC								0.90	0.08							9.73E-01
Gasoline PM	PM									0.0093							9.30E-03
Antimony	Metals	9.83E-05	1.09E-04	4.92E-06	4.54E-05	8.09E-06	3.35E-05				2.73E-06	2.74E-05	8.53E-06	1.21E-06	6.37E-05	1.68E-05	4.20E-04
Arsenic	Metals	1.10E-04	1.60E-04	2.46E-06	7.93E-05	9.69E-06	1.67E-05				1.36E-06	3.24E-05	5.32E-06	8.21E-07	4.77E-05	1.66E-05	4.83E-04
Barium	Metals	1.42E-03	3.45E-02	1.53E-03	2.13E-02	3.70E-03	1.05E-02				1.09E-03	1.19E-02	2.10E-03	2.83E-04	2.64E-02	5.90E-03	1.21E-01
Beryllium	Metals	5.52E-05	2.86E-05	1.48E-06	1.20E-05	2.43E-06	1.00E-05				8.19E-07	8.23E-06	3.99E-06	3.65E-07	1.91E-05	5.03E-06	1.47E-04
Cadmium	Metals	5.52E-05	5.35E-05	2.46E-06	2.89E-05	5.22E-06	1.67E-05				1.36E-06	1.37E-05	4.40E-06	7.74E-07	3.18E-05	8.38E-06	2.22E-04
Total Chromium	Metals	8.04E-04	1.76E-03	4.72E-05	6.50E-04	9.69E-05	3.22E-04				4.48E-05	4.56E-04	7.66E-05	1.03E-05	6.54E-04	1.63E-04	5.09E-03
Cobalt	Metals	2.54E-04	2.63E-04	1.26E-05	1.03E-04	1.82E-05	8.58E-05				1.07E-05	9.21E-05	1.96E-05	2.65E-06	1.97E-04	4.57E-05	1.10E-03
Copper	Metals	6.15E-04	8.56E-04	2.75E-05	5.43E-04	7.98E-05	1.88E-04				2.69E-05	3.12E-04	4.42E-05	8.30E-06	5.81E-04	1.58E-04	3.44E-03
Lead	Metals	1.28E-04	9.95E-05	2.56E-06	3.68E-05	5.13E-06	1.74E-05				2.51E-06	4.54E-05	4.97E-06	6.97E-07	3.18E-05	8.38E-06	3.84E-04
Manganese	Metals	5.79E-04	--	--	--	--	--				--	--	--	--	--	--	5.79E-04
Mercury	Metals	8.43E-02	3.00E-05	3.93E-07	1.26E-05	8.69E-07	2.68E-06				1.53E-07	1.82E-06	9.56E-07	1.03E-07	7.32E-06	1.91E-06	8.44E-02
Molybdenum	Metals	1.88E-03	2.98E-04	4.92E-06	9.98E-05	1.44E-05	3.35E-05				2.73E-06	5.34E-05	9.27E-06	1.22E-06	6.37E-05	1.68E-05	2.47E-03
Nickel	Metals	9.46E-04	5.56E-03	4.53E-05	1.05E-03	1.09E-04	3.08E-04				5.86E-05	9.47E-04	1.02E-04	1.27E-05	1.03E-03	2.46E-04	1.04E-02
Phosphorous	Metals	1.07E-02	--	--	--	--	--				--	--	--	--	--	--	1.07E-02
Selenium	Metals	6.17E-04	9.52E-05	4.92E-06	4.18E-05	8.09E-06	3.35E-05				2.73E-06	5.81E-06	8.29E-06	1.19E-06	6.37E-05	1.68E-05	8.99E-04
Silver	Metals	1.07E-04	4.76E-05	2.56E-06	2.09E-05	4.12E-06	1.74E-05				1.36E-06	1.37E-05	4.27E-06	6.14E-07	3.18E-05	8.38E-06	2.60E-04
Thallium	Metals	6.17E-04	8.62E-04	2.56E-06	4.35E-04	1.04E-05	1.74E-05				1.36E-06	1.37E-05	4.52E-06	6.61E-07	3.18E-05	8.38E-06	2.01E-03
Vanadium	Metals	5.52E-04	1.89E-02	3.74E-05	4.32E-03	3.67E-04	2.55E-04				9.10E-05	2.80E-03	2.13E-04	3.63E-05	1.12E-03	3.43E-04	2.91E-02
Zinc	Metals	7.46E-03	2.18E-03	4.92E-05	1.66E-03	2.33E-04	3.35E-04				3.71E-05	6.71E-04	9.36E-05	1.86E-05	9.27E-04	3.18E-04	1.40E-02
Chromium (VI)	Metals	4.87E-05	2.79E-04	1.97E-07	4.23E-05	9.60E-07	1.34E-06				2.07E-06	1.80E-05	3.69E-07	5.80E-08	2.55E-06	6.70E-07	3.97E-04
Total Crystalline Silica	Other TAC	--	1.23E-02	7.30E-03	1.55E-02	7.84E-03	4.97E-02				7.75E-03	3.20E-02	9.89E-03	1.64E-03	1.51E-01	3.23E-02	3.28E-01
Naphthalene	PAH's	2.01E-02															2.01E-02
2-Methyl naphthalene	PAH's	1.64E-02															1.64E-02
Acenaphthylene	PAH's	1.67E-04															1.67E-04
Acenaphthene	PAH's	2.57E-05															2.57E-05
Fluorene	PAH's	2.39E-03															2.39E-03
Phenanthrene	PAH's	1.33E-02															1.33E-02
Anthracene	PAH's	8.94E-05															8.94E-05
Fluoranthene	PAH's	2.28E-04															2.28E-04
Pyrene	PAH's	1.70E-04															1.70E-04
Benz[a]anthracene	PAH's	1.90E-06															1.90E-06
Chrysene	PAH's	5.60E-06															5.60E-06
Benzo[b]fluoranthene	PAH's	2.71E-07															2.71E-07
Benzo[k]fluoranthene	PAH's	4.27E-08															4.27E-08
Benzo[e]pyrene	PAH's	1.99E-07															1.99E-07
Benzo[a]pyrene	PAH's	4.27E-08															4.27E-08
Perylene	PAH's	4.27E-08															4.27E-08
Indeno[1,2,3-c,d]pyrene	PAH's	3.17E-08															3.17E-08
Dibenz[a,h]anthracene	PAH's	4.27E-08															4.27E-08
Benzo[g,h,i]perylene	PAH's	4.27E-08															4.27E-08
1,2,3,4,6,7,8-HpCDD	PCDD/PCDF	1.40E-09															1.40E-09
1,2,3,4,6,7,8-HpCDF	PCDD/PCDF	6.77E-10															6.77E-10
1,2,3,4,7,8,9-HpCDF	PCDD/PCDF	1.75E-10															1.75E-10
1,2,3,4,7,8-HxCDD	PCDD/PCDF	3.90E-10															3.90E-10
1,2,3,4,7,8-HxCDF	PCDD/PCDF	5.90E-10															5.90E-10
1,2,3,6,7,8-HxCDD	PCDD/PCDF	3.85E-10															3.85E-10
1,2,3,6,7,8-HxCDF	PCDD/PCDF	5.52E-10															5.52E-10

Revisions to CEIR Addendum  
August 18, 2010

**APPENDIX A**  
**TABLE S-3**  
**REVISED FACILITY HOURLY EMISSIONS SUMMARY**  
Lehigh Southwest Cement Company  
Cupertino Facility

Pollutant	Chemical Group	Kiln	DC-Cement	DC-Rock	PF-Cement	PF-Crushing and Screening	PF-Rock Plant	Dispensing Facilities	Emergency Diesel Generators	Welding Stationary IC Engines	Unpaved Roads Wind Erosion	Paved/Unpaved Roads Dust Entrainment	Stockpile Wind Erosion	Stockpile Material Handling	Mines MF10 <sup>2</sup>	Mines MF24 <sup>3</sup>	Total (lb/hr) <sup>1</sup>
1,2,3,7,8,9-HxCDD	PCDD/PCDF	3.98E-10															3.98E-10
1,2,3,7,8,9-HxCDF	PCDD/PCDF	1.86E-10															1.86E-10
1,2,3,7,8-PeCDD	PCDD/PCDF	3.44E-10															3.44E-10
1,2,3,7,8-PeCDF	PCDD/PCDF	2.66E-09															2.66E-09
2,3,4,6,7,8-HxCDF	PCDD/PCDF	3.40E-10															3.40E-10
2,3,4,7,8-PeCDF	PCDD/PCDF	3.98E-09															3.98E-09
2,3,7,8-TCDD	PCDD/PCDF	3.38E-10															3.38E-10
2,3,7,8-TCDF	PCDD/PCDF	1.67E-08															1.67E-08
HpCDD (Total)	PCDD/PCDF	2.19E-09															2.19E-09
HpCDF (Total)	PCDD/PCDF	6.89E-10															6.89E-10
HxCDD (Total)	PCDD/PCDF	9.73E-09															9.73E-09
HxCDF (Total)	PCDD/PCDF	3.39E-09															3.39E-09
OCDD	PCDD/PCDF	2.92E-09															2.92E-09
OCDF	PCDD/PCDF	6.69E-10															6.69E-10
PeCDD (Total)	PCDD/PCDF	1.04E-08															1.04E-08
PeCDF (Total)	PCDD/PCDF	1.02E-07															1.02E-07
TCDD (Total)	PCDD/PCDF	2.76E-08															2.76E-08
TCDF (Total)	PCDD/PCDF	1.90E-06															1.90E-06
1,1,1-trichloroethane	TAC	4.65E-03															4.65E-03
1,1,1,2,2-tetrachloroethane	TAC	5.85E-03															5.85E-03
1,1,2-trichloroethane	TAC	7.75E-03															7.75E-03
1,1-dichloroethane	TAC	2.87E-03															2.87E-03
1,1-dichloroethylene	TAC	5.64E-03															5.64E-03
1,2,4-trichlorobenzene	TAC	1.58E-02															1.58E-02
1,2,4-trimethylbenzene	TAC	2.00E-01															2.00E-01
1,2-dibromoethane	TAC	8.73E-03															8.73E-03
1,2-dichloroethane	TAC	3.45E-03															3.45E-03
1,2-dichloropropane	TAC	3.94E-03															3.94E-03
1,3,5-trimethylbenzene	TAC	1.64E-01															1.64E-01
1,3-butadiene	TAC	1.33E-02															1.33E-02
4-ethyl-toluene	TAC	6.23E-02															6.23E-02
Acrolein	TAC	6.51E-03															6.51E-03
Benzene	TAC	1.40E+00						3.70E-06									1.40E+00
Benzyl chloride	TAC	1.47E-02															1.47E-02
c-1,2-dichloroethene	TAC	5.64E-03															5.64E-03
c-1,3-dichloropropene	TAC	9.67E-03															9.67E-03
Carbon Tetrachloride	TAC	8.94E-03															8.94E-03
Chlorobenzene	TAC	8.04E-02															8.04E-02
Chloroform	TAC	4.16E-03															4.16E-03
Dichloromethane	TAC	1.87E-02															1.87E-02
Ethyl Chloride	TAC	5.62E-03															5.62E-03
Ethylbenzene	TAC	1.39E-01															1.39E-01
Freon 11	TAC	4.79E-03															4.79E-03
Freon 113	TAC	6.53E-03															6.53E-03
Freon 114	TAC	5.95E-03															5.95E-03
Freon 12	TAC	3.51E-03															3.51E-03
Hexachlorobutadiene	TAC	1.52E-02															1.52E-02
m+p-xylenes	TAC	1.01E+00						4.06E-05									1.01E+00
m-dichlorobenzene	TAC	6.83E-03															6.83E-03
Methyl Bromide	TAC	9.07E-02															9.07E-02
Methyl Chloride	TAC	1.60E-01															1.60E-01
o-dichlorobenzene	TAC	6.83E-03															6.83E-03
o-xylene	TAC	1.97E-01															1.97E-01
p-dichlorobenzene	TAC	8.54E-03															8.54E-03
Perchloroethylene	TAC	7.70E-03															7.70E-03

Revisions to CEIR Addendum  
August 18, 2010

**APPENDIX A**  
**TABLE S-3**  
**REVISED FACILITY HOURLY EMISSIONS SUMMARY**  
Lehigh Southwest Cement Company  
Cupertino Facility

Pollutant	Chemical Group	Kiln	DC-Cement	DC-Rock	PF-Cement	PF-Crushing and Screening	PF-Rock Plant	Dispensing Facilities	Emergency Diesel Generators	Welding Stationary IC Engines	Unpaved Roads Wind Erosion	Paved/Unpaved Roads Dust Entrainment	Stockpile Wind Erosion	Stockpile Material Handling	Mines MF10 <sup>2</sup>	Mines MF24 <sup>3</sup>	Total (lb/hr) <sup>1</sup>
Styrene	TAC	3.52E-02															3.52E-02
t-1,3-dichloropropene	TAC	6.44E-03															6.44E-03
Toluene	TAC	1.25E+00						1.65E-05									1.25E+00
Trichloroethene	TAC	6.10E-03															6.10E-03
Vinyl Chloride	TAC	2.06E-02															2.06E-02
Hydrogen Chloride	Other	1.55E+01															1.55E+01
Acetaldehyde	Volatile Organics	1.68E-01															1.68E-01
Formaldehyde	Volatile Organics	9.15E-03															9.15E-03

Notes

1. All pollutants reported in lbs/hr
2. MF10 are mine fugitives emissions occurring over 10 hours per day (operating hours).
3. MF24 are mine fugitive emissions occurring 24 hours per day.