

September 2, 2009

To Whom It May Concern at the EPA:

On behalf of the members of Santa Clara County Medical Association and the Environmental Health Committee, we support the referenced proposal (Docket ID NO. EPA-HQ-OAR-2002-0051) to improve regulation of cement kiln emissions.

Santa Clara County is home to the Lehigh Southwest cement plant in Cupertino, CA, one of the nation's largest emitters of mercury and other hazardous air pollutants. We believe that there should be no exemptions for those plants that burn high-mercury limestone. As stated by EPA's own consultants, standardized regulation of cement plant emissions will result in drastic cost savings stemming from a decrease in health-related morbidity and mortality. This regulation is estimated to result in 620-1600 avoided deaths per year, with a cost savings between \$4.4 to \$11 billion.

In addition, the Lehigh plant in our county is one of a handful of cement plants that does not have a central stack, making monitoring of emissions difficult, if not impossible. We support the requirement of a central stack to ensure proper monitoring and compliance with EPA regulations.

Sincerely,

William C. Parrish, Jr

William C. Parrish, Jr
SCCMA CEO