



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

VIA ELECTRONIC MAIL

Mr. Craig Gordinier  
Plant Manager  
Lhoist North America of Alabama, LLC  
7444 AL-25  
Calera, Alabama 35040  
[craig.gordinier@lhoist.com](mailto:craig.gordinier@lhoist.com)

Re: Lhoist North America of Alabama, LLC – Montevallo Plant  
Clean Air Act Compliance Extension Request

Dear Mr. Gordinier:

This letter is in response to the Lhoist North America of Alabama, LLC (LNA) request dated December 17, 2020, for an extension to the January 20, 2021, compliance date for the National Emission Standards for Hazardous Air Pollutants for Lime Manufacturing Plants, at 40 C.F.R. Part 63, Subpart AAAAA. Pursuant to 40 C.F.R. § 63.6(i)(12)(i), the United States Environmental Protection Agency is notifying you that the EPA intends to deny the compliance extension request.

LNA has requested an extension to the January 20, 2021, Subpart AAAAA compliance date for its Montevallo lime manufacturing facility in Calera, Alabama. The December 17, 2020, request application states the compliance extension is needed to install Continuous Opacity Monitoring System (COMS) at the LNA facility for Kilns 3 and 4 to monitor opacity during startup and shutdown.

The compliance extension provisions at 40 C.F.R. § 63.6(i)(4)(i)(A) state that the EPA may grant an extension allowing an affected source up to one additional year to comply with the standard, “if such additional period is necessary for *the installation of controls.*” (emphasis added). Pollution control devices and equipment are separate and distinct from pollution monitoring equipment. *See* 40 C.F.R. § 63.2. (monitoring includes “the use of measurement data ... to control the operation of a process or pollution control device.”). The EPA Region 4 considers a COMS to be monitoring equipment, rather than control equipment and as such, the compliance extension provision of § 63.6(i)(4)(i)(A) is not applicable for this request.

Pursuant to 40 C.F.R. § 63.6(i)(12)(iii)(B), LNA has 15 calendar days to present additional information or arguments to the EPA before further action on the request. Should you have questions concerning the above, please contact Stephen Rieck at (404) 562-9177, or by email at [rieck.stephen@epa.gov](mailto:rieck.stephen@epa.gov).

Sincerely,

JOHN  
BLEVINS

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John Blevins  
Acting Regional Administrator

cc: Ron Gore, Director, ADEM