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November 20, 2006

David Schanbacher
Chief Engineer
Texas Commission on Environmental Quality
Bldg. F, Fourth Floor
12100 Park 35 Circle
Austin, TX 78753

Via email

Re: Comments of the Portland Cement Association on "Assessment of NOx Emissions Reduction Strategies for Cement Kilns - Ellis County: Final Report"

Dear Mr. Schanbacher:

Enclosed please find the comments of the Portland Cement Association ("PCA") on "Assessment of NOx Emissions Reduction Strategies for Cement Kilns - Ellis County: Final Report" ("Final Report"). PCA previously submitted comments to the TCEQ on the Draft Final Report on January 24, 2006. Unfortunately, the Final Report continues to suffer from most of the same major problems (e.g., inaccurate and inconsistent information regarding SCR and LoTOx technologies) identified in those prior comments.

We trust that these comments will be helpful to the TCEQ in its analysis of cement kiln NOx control technologies. Please do not hesitate to call if you have any questions.

Sincerely,



Albert R. Axe, Jr.

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Chief Engineer
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Enclosure

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