



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

NOV 17 2014

CERTIFIED MAIL - RETURN RECEIPT REQUESTED: 7014 0150 0000 2453 3368

Mr. Jim Addams
Senior Vice President
Holcim (US) Inc.
Texas/Oklahoma Region
122 W. Carpenter Freeway, Ste. 485
Irving, TX 75039

Re: Request for Information pursuant to the Clean Air Act
Holcim (US) Inc. – Ada Plant, Ada, Oklahoma

Dear Mr. Addams:

Enclosed is an Information Request (Request) issued to Holcim (US) Inc. (Holcim), relating to its Portland cement plant in Ada, Oklahoma, under the authority of Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414. The purpose of this Request is to obtain information necessary to determine Holcim's compliance with the Clean Air Act.

Please mail your response to Ms. Kathleen Aisling, at the above address (Mail Code 6EN-AA), within fourteen (14) days of your receipt of this letter, unless otherwise noted in the enclosure to this letter. If you need more time, EPA may grant an extension for cause upon written request.

If you have any questions, need to request an extension, or wish to schedule a meeting to discuss this Request, please contact Ms. Aisling, of my staff, at (214) 665-6406, or the attorney assigned to this case, Mr. Justin Lannen, at (214) 665-8130.

Sincerely,

A handwritten signature in black ink, appearing to read "John Blevins", written over a horizontal line.

John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosure

cc: Kendal Stegmann, Oklahoma Department of Environmental Quality

ENCLOSURE
INFORMATION REQUEST
for
HOLCIM (US) INC.
PART 1 OF 4

AUTHORITY, INSTRUCTIONS, & DEFINITIONS

AUTHORITY

The U.S. Environmental Protection Agency (EPA) Region 6 is issuing this request for information ("Request") to Holcim (US) Inc. ("Holcim") to provide certain information regarding its Portland cement manufacturing facility ("Facility"), located in Ada, Oklahoma. This request is issued pursuant to Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a), for the purpose of determining Holcim's compliance with the CAA. Section 114(a) authorizes the Administrator of EPA to require the submission of this information. The Administrator has delegated this authority to the Director of the Enforcement Division, EPA Region 6. Therefore, you are hereby required to provide responses to the questions and requested information regarding the Holcim Facility located in Ada, Oklahoma, as identified in **PART 2** of this Enclosure.

EPA requires Holcim to submit the information requested no later than fourteen (14) calendar days after receipt of this letter, except for the information requested in Questions 2, 3, and 4 in Part 2 below, which must be submitted no later than thirty (30) calendar days after receipt of this letter. If information or documents not known or not available to you as of the date of submission of a response to the Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find, at any time after the submission of your response, that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. There are significant penalties for submitting false information, including the possibility of fine or imprisonment.

This Request is not subject to the Paperwork Reduction Act, 44 U.S. C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Please be advised that failure to provide the information required by this letter in a timely manner and in accordance with the Request may result in the initiation of a civil action pursuant to Section 113(b) of the CAA, 42 U.S.C. § 7413(b). In addition, Section 113(c) of the CAA provides criminal penalties for knowingly making any false statement or omission in any response required under the CAA. EPA may also seek criminal penalties from any person who knowingly alters, destroys, mutilates, conceals, covers up, falsifies,

HOLCIM ADA INFORMATION REQUEST

PART 1: AUTHORITY, INSTRUCTIONS, & DEFINITIONS

or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of EPA or in relation to or contemplation of any such matter or case. See 18 U.S.C. §§ 1001, 1341, 1519.

Any information that you provide in response to the Request may be used in administrative, civil, and criminal proceedings. We request that a duly authorized officer or agent of Holcim certify your response to the Request by signing the enclosed Statement of Certification, provided in **PART 3**, and returning it with your response.

For claiming any information you provide as confidential business information, please see **PART 4**.

INSTRUCTIONS

1. Provide a separate narrative response to each question and subpart of a question set forth in the Request.
2. Precede each answer with the number of the question to which it corresponds and at the end of each answer identify the person(s) that provided information that was used or considered in responding to that question, as well as each person that was consulted in the preparation of that response.
3. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
4. For each question, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific question.
5. Indicate on each document produced in response to the Request, or in some other reasonable manner, the number of the question to which the document corresponds. For electronic documents, see our recommendation in item 7, below.
6. Where documents or information necessary for a response are neither in your possession nor available to you, indicate in your response why such documents or information is not available or in your possession and identify any source that either possesses or is likely to possess such information.
7. EPA requests that you provide all documents responsive to the Request in a searchable electronic format such as Portable Document Format (PDF) except as specified below, saved to a compact disc or flash drive, rather than hard copy.

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- a. When specific questions request data in an electronic format, or if a requested document is already in an electronic format, the data and corresponding information should be provided in editable Excel (or similar spreadsheet) format, not in image format. If Excel format is not available, the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel. All Excel or similar spreadsheets responsive to this request in Holcim's possession at the time of this request must be provided in their original, un-altered format.
- b. When specific questions request electronic maps of the facility, the maps should be provided in electronic desktop geographical information system (GIS) shapefiles compatible with ArcView GIS 9.3, instead of PDF.
- c. Each document provided in electronic form, whether image or editable spreadsheet format, or GIS shapefiles, must still be provided in accordance with those instructions for submittal of documents as outlined above (e.g., each PDF document should include all enclosures/attachments associated with the document, or a reference page added to indicate that a separate PDF document is provided as the enclosure/attachment so referenced).
- d. For each compact disc or flash drive containing electronic documents submitted in response to the Request, a table of contents for the electronic documents on individual and/or multiple discs/drives must be provided so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of file folders organized by question number. In addition, each compact disc or flash drive should be labeled appropriately (e.g., Company Name, Disc 1 of 4 for Information Request Response, Date of Response).
- e. To facilitate appropriate records management, we request that confidential business information and non-confidential information be submitted on separate disks/drives. Please also mark each page that is confidential business information as such.

DEFINITIONS

All terms used in the Request will have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. § 7401, 40 C.F.R. Part 52 (which incorporates the Federally-approved State Implementation Plan), other CAA implementing regulations, or otherwise defined herein.

1. The term "Holcim" includes any officer, director, agent, or employee of Holcim (US) Inc., including any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof.

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PART 1: AUTHORITY, INSTRUCTIONS, & DEFINITIONS

2. The term "Cement Kiln" or "Kiln" shall mean the equipment used to produce clinker by heating limestone and other materials for subsequent production of cement for use in commerce, including a rotary kiln and any associated clinker cooler, preheater and/or precalciner devices.
3. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, draft or final, whether or not wholly or partially in handwriting, including documentation solely in electronic form, including by way of illustration and not by way of imitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations, including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, email, analysis, comparison, graph, chart, interoffice or intraoffice communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.
4. The term "FLSmith" includes any officer, director, agent, or employee of FLSmith, Inc., including any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof.
5. The term "Kiln Replacement Project" shall mean the entire project proposed and described in Holcim's June 2, 2014, Permit Modification Application for Holcim (US) Inc., Ada Portland Cement Production Plant; all iterations of that proposed project since project inception; and all subsequent changes or additions to the proposed project to date. The "Kiln Replacement Project" includes, but is not limited to, the planned replacement of the Kilns and all ancillary and unrelated changes which will be implemented as described in the June 2, 2014 permit modification application and any subsequent changes to the proposed project.
6. The term "NESHAP" shall mean the National Emission Standards for Hazardous Air Pollutants promulgated at 40 C.F.R. Part 63.

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7. The term "NSPS" shall mean the Standards of Performance for New Stationary Sources promulgated at 40 C.F.R. Part 60.
8. The terms "person" or "persons" shall have the meaning set forth in Section 302(e) of the Act, 42 U.S.C. § 7602(e), and includes an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent or employee thereof.
9. The terms "PSD" and "NSR" shall mean the Prevention of Significant Deterioration and the New Source Review preconstruction permitting programs established at the CAA subparts C and D, respectively, and further defined at 40 C.F.R. Parts 51 and 52 and any respective program established under a state implementation plan.
10. The term "ODEQ" shall mean the Oklahoma Department of Environmental Quality or any of its predecessor agencies.
11. The term "Trinity Consultants" includes any officer, director, agent, or employee of Trinity Consultants, Inc., including any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof.
12. The terms "you" or "yours," as used in each of the questions set forth in the attached Section 114 letter, refers to, and shall mean, the company or corporation with which each addressee of the attached Section 114 letter is affiliated, including its subsidiaries, division, affiliates, predecessors, successors, and assigns, and its former and present officers, directors, agents, employees, representatives, attorneys, consultants, accountants and all other persons acting on its behalf.
13. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

ENCLOSURE
INFORMATION REQUEST
for
HOLCIM (US) INC.

PART 2 OF 4
QUESTIONS AND INFORMATION SPECIFIC TO
ADA CEMENT PLANT

In accordance with that authority outlined in **Part 1** of this Enclosure, this Request pertains specifically to Holcim's Portland cement plant, located at 14500 CR 1550, Ada, Potococ County, Oklahoma (the "Facility").

The Facility contains emission units that emit or have the potential to emit pollutants subject to requirements of the PSD or NSR, and NSPS programs. The Facility also is subject to the requirements of Title V of the CAA and the Portland Cement NESHAP. Accordingly, Holcim is requested to provide information that relates to the Facility, including, but not limited to, the following:

1. For each day between September 1, 2012, and the present, provide the following data in an electronic format and identify the averaging period:
 - a. Raw material feed rate in tons (daily total);
 - b. Kiln production rate in tons of clinker (daily total);
 - c. Type and percentage of each raw material used and the total feed rate to the Kiln for each raw material (daily); and
 - d. Nitrogen oxides (NO_x), sulfur dioxide (SO₂), carbon monoxide (CO), and oxygen (O₂) concentrations on a dry basis, and mass rates (except for O₂) for the Kiln (daily average for concentrations and daily totals for mass rates) as measured at the Kiln stack gas analyzer or by the Kiln's continuous emission monitoring system (CEMS);
2. For each day between September 1, 2012, and the present, provide the following data in an electronic format and identify the averaging period:
 - a. Flue gas volumetric flow rate as a daily average in dry actual cubic feet per minute (acfm) and dry standard cubic feet per minute (dscfm);
 - b. Kiln flue gas temperature at the inlet to the fabric filter or electrostatic precipitator, as applicable, or at the Kiln stack (daily average);

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PART 2: QUESTIONS AND INFORMATION REQUESTED

- c. Sulfate in feed (calculated to a daily average percentage);
 - d. Feed burnability (C3S) (daily average or daily reading);
 - e. Burning zone temperature (daily average);
 - f. Back end Kiln temperature (daily average);
 - g. Back end Kiln oxygen (daily average);
 - h. Back end Kiln oxygen set points (as measured or recorded by the Kiln operator or process engineer)
 - i. Kiln fuel feed rate and type of fuel by weight or total heat input (daily average);
 - j. Fuel distribution, if fuel is injected at more than one location, how much is injected at each location (daily average); and
 - k. Primary, secondary and tertiary air rate into the Kiln, preheater and/or precalciner (as applicable) or blower/fan settings.
3. Based on data from the CEMS, continuous emission rate monitoring system, and all other records or any other documents, including, but not limited to, emission factors or stack tests, provide a table of data in electronic form that includes the following for each day for each Kiln from September 1, 2012 to the present:
- a. Emissions in pounds per ton of clinker produced and tons per day for each operating day (midnight to midnight) for the following pollutants: NO_x, SO₂, CO, particulate matter (PM), and particulate matter less than ten microns (PM₁₀).
 - b. A description of the source of the data and methodology used in calculating item 3.a. above.
4. From September 1, 2008, to the present, for each emission source (Kiln, raw mill, clinker cooler, etc.) at the Facility, provide a list of the dates of all complete or partial air emissions testing for all units for SO₂, NO_x, PM (including filterable and condensable particulates), VOC, CO, lead, mercury, hydrogen chloride, dioxin/furan, and all other regulated air emissions. Emission testing includes, but is not limited to, compliance testing, engineering testing, and testing for general information. For each emission test, provide a copy of the summary pages from each report, including the emission rates as well as all the operating parameters

HOLCIM ADA INFORMATION REQUEST
PART 2: QUESTIONS AND INFORMATION REQUESTED

recorded during the tests for each process unit, including, but not limited to, Kiln feed rate, fuel type, fuel firing rate, and clinker production rate. Indicate whether each report was shared with the local or state permitting agency.

5. Provide copies of all capital appropriation requests, financial justifications, and authorizations, including attachments and addenda related to and/or concerning the Kiln Replacement Project.
6. Provide copies of all engineering analyses, reports, planning documents, meeting notes, studies, project information, internal or external correspondence, e-mail, memoranda, and telephone discussion summaries or notes related to the Kiln Replacement Project. These documents shall include all aspects of the Kiln Replacement Project.
7. Provide copies of all other documents related to the Kiln Replacement Project. The information provided shall include all documents generated or reviewed up to the date of this request. The information provided shall include, but is not limited to, the following:
 - a. Documents associated with, or relied upon for, the preparation of the permit application for the Kiln Replacement Project, such as:
 - i. All communications with outside personnel, including vendors and consultants,
 - ii. Calculations,
 - iii. Drawings,
 - iv. Notes,
 - v. Data, and
 - vi. Any document related to changes in assumptions, project parameters or concepts regarding the Project.
 - b. Documents associated with the cost of all components of the Kiln Replacement Project, such as:
 - i. All documents related to the NSPS reconstruction analysis in the June 2014 permit application, including, but not limited to, electronic copies of all spreadsheets,
 - ii. Bids,
 - iii. Drawings,
 - iv. Estimates,
 - v. Notes, emails, conversation records regarding costs associated with the Project, and
 - vi. Any other documents related to the description in 7.b.
 - c. Documents associated with the specifications of the equipment and components within the Kiln Replacement Project, such as:
 - i. Drawings,

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PART 2: QUESTIONS AND INFORMATION REQUESTED

- ii. Assumptions,
 - iii. Changes to the design or redesign,
 - iv. Material specifications,
 - v. Dimensions,
 - vi. Correspondence with outside personnel including email, and
 - vii. Any other documents related to the description in 7.c.
 - d. Documents such as reports, letters, calculations, drawings, or other information regarding the following specific aspects of Kiln Replacement Project:
 - i. The cost of the Kiln and related equipment,
 - ii. The applicability of NSPS to the Kiln and any associated equipment,
 - iii. The applicability of NSR to the Kiln and any associated equipment,
 - iv. The applicability of the Portland Cement MACT rule, and
 - v. The ability of the Kiln and associated equipment to meet emission limits in the NSPS or Portland Cement MACT rules, and
 - e. Documents related to potential performance issues that could be encountered in implementing the Kiln Replacement Project.
 - f. Documents related to the anticipated date of construction, installation, testing, and completion for each component of the Kiln Replacement Project.
 - g. To the extent not already provided, provide all documents related to the NSPS reconstruction cost analysis related to or for the Kiln Replacement Project.
8. Provide a detailed list of each existing device, vessel, or piece of equipment, which is part of the Kiln, and will continue to operate as part of the Kiln after the Kiln Replacement Project. For this list also provide:
- a. The original date of construction of this device, vessel or piece of equipment,
 - b. Its estimated original installed cost,
 - c. A diagram of the device, vessel or piece of equipment showing its physical location in relation to the Kiln, preheater and clinker cooler,
 - d. A schematic including the device displaying its location in the process schematically, and
 - e. A description of any and all changes to the device, vessel or piece of equipment proposed within the Kiln Replacement Project and any and all changes to the device, vessel, or piece of equipment which have occurred in the past ten (10) calendar years.

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PART 2: QUESTIONS AND INFORMATION REQUESTED

9. Provide all documents not submitted under previous questions relating to any communication between Holcim and FLSmidth and between Holcim and Trinity Consultants regarding any component of the Kiln Replacement Project.
10. Provide all documents relating to any communication between FLSmidth, Trinity Consults, or Holcim and the ODEQ regarding the Kiln Replacement Project.

ENCLOSURE
INFORMATION REQUEST
for
HOLCIM (US) INC.

PART 3 OF 4
STATEMENT OF CERTIFICATION FORM
FOR DULY AUTHORIZED AGENT

STATEMENT OF CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Act, and 18 U.S.C. §§ 1001 and 1341.

(Signature)

(Title)

(Date)

ENCLOSURE
INFORMATION REQUEST
for
HOLCIM (US) INC.

PART 4 OF 4
CONFIDENTIAL BUSINESS INFORMATION (CBI)
CLAIM ASSERTION & SUBSTANTIATION REQUIREMENTS

Assertion Requirements

You may assert a business confidentiality claim covering all or part of the information requested in response to this information request, as provided in 40 C.F.R. § 2.203(b). You may assert a business confidentiality claim covering such information by placing on (or attaching to) the information you desire to assert a confidentiality claim, at the time it is submitted to EPA, a cover sheet, stamped, or typed legend (or other suitable form of notice) employing language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified, and may be submitted separately to facilitate identification and handling by EPA. If confidential treatment is desired up until a certain date or until the occurrence of a certain event, the notice should state this. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Clean Air Act (the Act) and 40 C.F.R. Part 2. EPA will construe the failure to furnish a confidentiality claim with your response to the attached letter as a waiver of that claim, and the information may be made available to the public without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of a claim. Emission data is exempt from claims of confidentiality under Section 114 of the Act, and the emissions data that you provide may be made available to the public. Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B.

Substantiation Requirements

All confidentiality claims are subject to EPA verification in accordance with 40 C.F.R. Part 2, subpart B. The criteria for determining whether material claimed as confidential is entitled to such treatment are set forth at 40 C.F.R. §§ 2.208 and 2.301, which provide, in part, that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent; and, that the disclosure of the information is likely to cause substantial harm to your business's competitive edge.

Pursuant to 40 C.F.R. Part 2, subpart B, EPA may at any time send you a letter asking you to substantiate fully your CBI claim. If you receive such a letter, you must provide EPA with a response within the number of days set forth in the EPA request letter. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or

HOLCIM (US) INC. INFORMATION REQUEST

PART 4: CBI CLAIM ASSERTION & SUBSTANTIATION REQUIREMENTS

claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential. You must be specific by page, paragraph, and sentence when identifying the information subject to your claim. Any information not specifically identified as subject to a confidentiality claim may be disclosed without further notice to you. For each item or class of information that you identify as being subject to CBI, you must answer the following questions, giving as much detail as possible, in accordance with 40 C.F.R. 2.204(e):

1. What specific portions of the information do you allege to be entitled to confidential treatment? For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?
7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.

HOLCIM (US) INC. INFORMATION REQUEST

PART 4: CBI CLAIM ASSERTION & SUBSTANTIATION REQUIREMENTS

8. Any other issue you deem relevant.

Please note that emission data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, subpart B. "Emission data" means, with reference to any source of emission of any substance into the air:

(A) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

(B) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

(C) A general description of the location and nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. §§ 2.301(a)(2)(i)(A),(B) and (C).

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Please also note that broad, non-specific CBI claims will likely result in an immediate request from EPA for substantiation.