

**From:** Todd Vlasak <mtvlasak@amistadgroupllc.com>  
**Sent:** Monday, June 10, 2024 6:26 PM  
**To:** Celine Rosales  
**Subject:** RE: TCEQ Air Permit No. 176403 / Project No. 374210 at K-C LEASE SERVICE, INC.'s Bay City Pugmill Facility  
**Attachments:** 2024-20 Matagorda Pug Mill Calculations Summary.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Celine,

I do not think the workbook calculations are very good for pugmills .. that's why we provided another set of our proprietary facility calculations, which we feel are much more accurate, though still very conservative, since the equipment is older.

We see this site at a maximum of 7.02 tons PM/yr ... I think I also sent those complete calculations with the submission, so hopefully you have them. We typically see a range of 5-10 tpy PM for our pugmill customer calculations, so this seems pretty reasonable for an older plant at 200 ton/hr production rate (which I doubt it could ever do).

As far as the concern, it seems we're still well below the 25 tpy PM threshold for the PRB.

I will be in the field most of the day on Tuesday, but you're welcome to call my cellular ... 713 818 9700.

Best regards,

**Todd Vlasak**

Director, Environmental Services & Remediation Technology

**Amistad Group, LLC**

PO Box 630747

Houston, Texas 77263-0747

713 783 0813 office

713 818 9700 direct

[mtvlasak@amistadgroupllc.com](mailto:mtvlasak@amistadgroupllc.com)



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**From:** Celine Rosales <[Celine.Rosales@tceq.texas.gov](mailto:Celine.Rosales@tceq.texas.gov)>  
**Sent:** Monday, June 10, 2024 4:22 PM  
**To:** Todd Vlasak <[mtvlasak@amistadgroupllc.com](mailto:mtvlasak@amistadgroupllc.com)>  
**Cc:** [MCMBAYCITY@GMAIL.COM](mailto:MCMBAYCITY@GMAIL.COM); Crystal Delacruz <[Crystal.DelaCruz@tceq.texas.gov](mailto:Crystal.DelaCruz@tceq.texas.gov)>

**Subject:** RE: TCEQ Air Permit No. 176403 / Project No. 374210 at K-C LEASE SERVICE, INC.'s Bay City Pugmill Facility

Good afternoon,

Thank you for the information. I have another question in order to complete my review.

- Typically for this type of pugmill facility, we do not see PM emissions this high, especially considering the 99% removal efficiency.
  - Could these emissions submitted in the workbook possibly be pre-control?
  - Otherwise, please provide clarification for the higher than average emissions.

**Emission Summary**

EPN / Emission Source	VOC		NOx		CO		PM		PM <sub>10</sub>	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
EPN1 / Silo							6.00	10.92	1.44	2.62
EPN2 / Loading							0.02	0.04	0.01	0.02
EPN3 / Central Baghouse										
EPN4 / Drop Points							0.08	0.15	0.03	0.05
EPN5 / Stockpiles							<0.01	<0.01	<0.01	<0.01
EPN6 / Roads							0.18	0.33	0.07	0.12
<b>TOTAL EMISSIONS (TPY):</b>	--	--	--	--	--	--	--	<b>11.44</b>	--	<b>2.81</b>
<b>MAXIMUM OPERATING SCHEDULE:</b>		<b>Hours/Year</b>								

Failure to submit all of the requested information by **June 13, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-7/PI-7 CERT (General Application for Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

If you have questions or would like to discuss this project over the phone, feel free to contact me.

Ms. Celine Rosales  
Rule Registration Team  
Air Permits Division, Office of Air, TCEQ  
(512) 239-1289  
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**From:** Todd Vlasak <[mtvlasak@amistadgroupllc.com](mailto:mtvlasak@amistadgroupllc.com)>  
**Sent:** Monday, June 3, 2024 10:38 AM  
**To:** Celine Rosales <[Celine.Rosales@tceq.texas.gov](mailto:Celine.Rosales@tceq.texas.gov)>  
**Cc:** [MCMBAYCITY@GMAIL.COM](mailto:MCMBAYCITY@GMAIL.COM); Trishia McDonald <[Trishia.McDonald@tceq.texas.gov](mailto:Trishia.McDonald@tceq.texas.gov)>  
**Subject:** RE: TCEQ Air Permit No. 176403 / Project No. 374210 at K-C LEASE SERVICE, INC.'s Bay City Pugmill Facility

Celine,

I got a more detailed description of the baghouse from the previous owner and updated the Table 11 (attached).

Please advise if this is updated information is adequate to meet the requirement.

Expected flow is 4 scfm through the system, with more bags than we thought ... with mechanical vibratory cleaning.

Best regards,

**Todd Vlasak**

Director, Environmental Services & Remediation Technology

**Amistad Group, LLC**

PO Box 630747  
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713 783 0813 office  
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**From:** Celine Rosales <[Celine.Rosales@tceq.texas.gov](mailto:Celine.Rosales@tceq.texas.gov)>  
**Sent:** Friday, May 31, 2024 11:09 AM  
**To:** Todd Vlasak <[mtvlasak@amistadgroupllc.com](mailto:mtvlasak@amistadgroupllc.com)>  
**Cc:** [MCMBAYCITY@GMAIL.COM](mailto:MCMBAYCITY@GMAIL.COM); Trishia McDonald <[Trishia.McDonald@tceq.texas.gov](mailto:Trishia.McDonald@tceq.texas.gov)>  
**Subject:** RE: TCEQ Air Permit No. 176403 / Project No. 374210 at K-C LEASE SERVICE, INC.'s Bay City Pugmill Facility

Good morning,

Thank you for the information. I have another question in order to complete my review.

- [PBR 106.146\(1\)](#) rule states “All bulk storage silos shall be equipped with fabric filter(s) having a maximum filtering velocity of 4.0 feet per minute (ft/min) with mechanical cleaning or 7.0 ft/min with automatic air cleaning.”
  - Please clarify which of these filtering velocities applies for your application.

Failure to submit all of the requested information by **June 5, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-7/PI-7 CERT (General Application for Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

If you have questions or would like to discuss this project over the phone, feel free to contact me.

Ms. Celine Rosales  
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**From:** Todd Vlasak <[mtvlasak@amistadgroupllc.com](mailto:mtvlasak@amistadgroupllc.com)>  
**Sent:** Tuesday, May 28, 2024 11:07 AM  
**To:** Celine Rosales <[Celine.Rosales@tceq.texas.gov](mailto:Celine.Rosales@tceq.texas.gov)>  
**Cc:** [MCMBAYCITY@GMAIL.COM](mailto:MCMBAYCITY@GMAIL.COM); Crystal Delacruz <[Crystal.DelaCruz@tceq.texas.gov](mailto:Crystal.DelaCruz@tceq.texas.gov)>  
**Subject:** RE: TCEQ Air Permit No. 176403 / Project No. 374210 at K-C LEASE SERVICE, INC.'s Bay City Pugmill Facility

Celine,

The design maximum filtering velocity is 150, but average expected is 135. It is only controlling the silo, and has a regular reverser air flow cleaning cycle when in operation.

Please find the attached Table 11.

Best regards,

**Todd Vlasak**  
Director, Environmental Services & Remediation Technology  
**Amistad Group, LLC**  
PO Box 630747  
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**From:** Celine Rosales <[Celine.Rosales@tceq.texas.gov](mailto:Celine.Rosales@tceq.texas.gov)>

**Sent:** Friday, May 24, 2024 4:42 PM

**To:** Todd Vlasak <[mtvlasak@amistadgroupllc.com](mailto:mtvlasak@amistadgroupllc.com)>

**Cc:** [MCMBAYCITY@GMAIL.COM](mailto:MCMBAYCITY@GMAIL.COM); Crystal Delacruz <[Crystal.Delacruz@tceq.texas.gov](mailto:Crystal.Delacruz@tceq.texas.gov)>

**Subject:** TCEQ Air Permit No. 176403 / Project No. 374210 at K-C LEASE SERVICE, INC.'s Bay City Pugmill Facility

Good afternoon,

I am the TCEQ Air Permit Reviewer assigned to the PBR Permit No. 176403 / Project No. 374210 at K-C LEASE SERVICE, INC. and Bay City Pugmill Facility in Matagorda County, Texas. You have been identified as a Technical Contact.

I have completed my initial review for this project and will need additional information/clarification before I can proceed with my review. Please address the following:

- Confirm that a fabric filter is being used.
  - If so, please provide a completed Table 11 form.
  - What is the maximum filtering velocity in ft/min?

Failure to submit all of the requested information by **May 31, 2024** may result in the TCEQ closing the application with a deficiency. After TCEQ closes the application, you may re-apply through STEERS by filing a new application Form PI-7/PI-7 CERT (General Application for Registration for Permits by Rule) and any additional information necessary to demonstrate compliance with the requirements in 30 TAC Chapter 106. TCEQ will retain the original permit fee for six months and you will not need to submit additional fees with the new application if the original fee was paid correctly.

If you have questions or would like to discuss this project over the phone, feel free to contact me.

Ms. Celine Rosales  
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Emissions Calculations Summary

K-C Lease dba Matagorda Construction and Materials, LLC

Bay City Pugmill Facility

EPN	FIN				Emissions Totals	Item #1	Item #2	Item #3	Item #4	Item #5	Item #6	Item #7	Item #8	Item #9	Item #10	Item #11	Item #12
EPN1	MCM Pug101	Vent-Style Baghouse Emissions from Silos & Weigh Hopper (Outlet Grain Loading Method)	E <sub>1</sub>	lb PM <sub>10</sub> /hr	0.01	0.01	0.00	0.00	0.00	0.00							
EPN1	MCM Pug101	Vent-Style Baghouse Emissions from Silos & Weigh Hopper (Outlet Grain Loading Method)	E <sub>2</sub>	ton PM <sub>10</sub> /yr	0.02	0.02	0.00	0.00	0.00	0.00							
EPN1	MCM Pug101	Vent-Style Baghouse Emissions from Silos & Weigh Hopper (Control Device Efficiency Method)	E <sub>3</sub>	lb PM <sub>10</sub> /hr	0.02	0.01	0.01										
EPN1	MCM Pug101	Vent-Style Baghouse Emissions from Silos & Weigh Hopper (Control Device Efficiency Method)	E <sub>4</sub>	ton PM <sub>10</sub> /yr	0.55	0.55	0.00										
EPN2	MCM Pug101	Loading/Bagging Emissions	E <sub>5</sub>	lb PM <sub>10</sub> /hr	1.20	1.20											
EPN2	MCM Pug101	Loading/Bagging Emissions	E <sub>6</sub>	ton PM <sub>10</sub> /yr	2.18	2.18											
EPN3	MCM Pug101	Central Baghouse Calculations	E <sub>7</sub>	lb PM <sub>10</sub> /hr	0.00	0.00											
EPN3	MCM Pug101	Central Baghouse Calculations	E <sub>8</sub>	ton PM <sub>10</sub> /yr	0.00	0.00											
EPN4	MCM Pug101	EPN4)	E <sub>9</sub>	lb TSP/hr	4.27	1.47	1.47	0.05	0.00	0.00	0.00	0.63	0.63	0.02	0.00	0.00	0.00
EPN4	MCM Pug101	Drop Point Emissions #1-#6 = Sand #7-#12 = Aggregate	E <sub>10</sub>	lb PM <sub>10</sub> /hr	0.12	0.04	0.04	0.00	0.00	0.00	0.00	0.02	0.02	0.00	0.00	0.00	0.00
EPN4	MCM Pug101	Drop Point Emissions #1-#6 = Sand #7-#12 = Aggregate	E <sub>11</sub>	ton TSP/yr	7.78	2.68	2.68	0.09	0.00	0.00	0.00	1.15	1.15	0.04	0.00	0.00	0.00
EPN4	MCM Pug101	Drop Point Emissions #1-#6 = Sand #7-#12 = Aggregate	E <sub>12</sub>	ton PM <sub>10</sub> /yr	0.22	0.08	0.08	0.00	0.00	0.00	0.00	0.03	0.03	0.00	0.00	0.00	0.00
EPN5	MCM Pug101	Stockpile Emissions	E <sub>13</sub>	ton TSP/yr	0.04	0.04											
EPN5	MCM Pug101	Stockpile Emissions	E <sub>14</sub>	ton PM <sub>10</sub> /yr	0.02	0.02											
EPN5	MCM Pug101	Stockpile Emissions	E <sub>15</sub>	ton TSP/yr	0.22	0.22											
EPN5	MCM Pug101	Stockpile Emissions	E <sub>16</sub>	ton PM <sub>10</sub> /yr	0.11	0.11											
EPN6	MCM Pug101	Road Emissions	E <sub>17</sub>	ton TSP/yr	7.83	2.00	3.90	1.33	0.00	0.00	0.60						
EPN6	MCM Pug101	Road Emissions	E <sub>18</sub>	ton PM <sub>10</sub> /yr	3.91	1.00	1.95	0.67	0.00	0.00	0.30						
Hourly PM Total				lb PM <sub>10</sub> /hr	1.35												
Annual Tons PM Total				ton PM <sub>10</sub> /yr	7.02												