

Permit by Rule (PBR) Registration Technical Review

Company:	SER Construction Partners, LLC	Registration No.:	134241L011
Nearest City:	Schertz	Project No.:	379513
County:	Bexar	Project Type:	Initial
Project Reviewer:	Jana Banigo	Regulated Entity No.:	RN108643305
Unit Name:	Portable Davis Pug Mill SN 1443-750P	Customer Reference No.:	CN603824335
PBR No(s).:	106.146	Project Received Date:	September 9, 2024
Physical Location:	11958 Schaefer Rd		

Project Overview / Process Description

SER Construction Partners, LLC (SER) submitted an application to authorize the continued operation of a previously authorized portable soil stabilization plant (pug mill) under PBR 106.146. SER also indicates that a small 160 hp diesel engine will be used to power the pugmill. Although the use of the engine does not require registration, SER indicates compliance with PBR 106.512(5) & (6).

The portable pug mill will be used to provide raw material such as pre-washed sand, screened rock, and reclaimed base material to a TX Dot construction project in Schertz, Bexar County, Texas. The site will also consist of a cement silo and stockpiled material.

The material will be delivered to the property by on-road trucks and stockpiled onsite. The stockpiled material will be loaded into the feed hopper by a front-end loader, and then conveyed to the pug mill. Cement from the silo will be fed to the system through a rotary feeder to an enclosed conveyor then into the pug mill. Cement tanker trucks will pneumatically fill the cement storage silo, the mixture will then be conveyed from the pug mill and loaded into trucks. The particulate emissions that occur at the silo will be controlled by a baghouse dust collector.

SER also indicates that the material, stockpiles, and roads will be watered as necessary for dust control.

A detailed project and process description, including calculations and a NAAQS demonstration of compliance for NOx is located in the public file. Additionally, SER has requested to void permit 134241L010 upon issuance of this registration.

Permit by Rule Requirements - 30 TAC Chapter 106

General Requirements

Registration Fee Reference No.:	Application fee: 720526 / 582EA000624692 Surcharge fee: 720527 / 582EA000624692
Is this registration certified?	No
Is planned MSS included in the registration?	No
Are there affected NSR or Title V authorizations for the project?	No
Are there any upstream or downstream affects associated with this registration?	No
Are associated upstream/downstream emissions either included in the registration OR within current permitted limits with no changes to underlying air authorizations for the applicable units regarding BACT, health and environmental impacts, or other representations.	NA
Are emissions for each PBR authorized facility less than the § 106.4(a)(1) limits?	Yes
Are total emissions from all sitewide PBR authorized facilities less than the § 106.4(a)(4) limits, OR has the site been subject to public notice requirements? Site is less than 106.4 (a)(4) limits	Yes
Are there permit limits on using PBRs at the site?	No
Is the facility in compliance with all other applicable rules and regulations?	Yes
Does the registration include an appropriate PBR workbook, and has the workbook been verified?	Yes

Notes:

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Federal Applicability

Does this project trigger a PSD or Nonattainment review?	No
Does the Major NSR applicability analysis include all associated upstream and/or downstream emissions?	NA
Are there any applicable standards under NSPS, NESHAP, or NESHAP for source categories (MACT)?	No
If yes, list applicable subparts:	
Notes:	

Permit by Rule Requirements - Compliance Demonstrations

PBR 106.146 Soil Stabilization Plants

Any soil stabilization facility that operates according to the following conditions of this section is permitted by rule.

- (1) All bulk storage silos will be equipped with fabric filter(s) having a maximum filtering velocity (**Actual 3.18 ft/min**) with automatic pulse jet air cleaning.
- (2) All conveyor belts transferring dry material to the pug mill will be top covered.
- (3) The pug mill used to mix the materials will be covered.
- (4) All permanent in-plant roads and vehicle work areas will be watered, to achieve maximum control of dust emissions.
- (5) An audible and visible mechanism will be installed on the storage silo to notify operators that the silo is full.
- (6) All stockpiles will be sprinkled with water as necessary to achieve maximum control of dust emissions.
- (7) N/A - Emulsified asphalt will not be used as a stabilizing admixture.
- (8) Before construction of the facility begins, written site approval will be received from the executive director and the facility will be registered with the commission's Office of Permitting, Remediating, and Registration in Austin using Form PI-7.
- (9) The facility will be located at least 300 feet (**Actual: >400 ft**) from any recreational area, school, residence, or other structure not occupied or used solely by the owner of the facility or the owner of the property upon which the facility is located. This distance limitation does not apply to structures within the boundaries of the project for which the facility is to process stabilized soil when the facility is located on or contiguous to the project.

Compliance History and Site Review

In accordance with 30 TAC Chapter 60, a compliance history report was reviewed on:		September 20,2024
Site rating / classification:	Unclassified	Company rating / classification: 4.50 / Satisfactory
Has any action occurred on the basis of the compliance history or rating?		No
Did the Regional Office provide site approval and confirm distances?		Yes
Reviewed by: Chistopher Rezendes		Date: September 18, 2024

Emission Summary

EPN / Emission Source	VOC		NOx		PM		PM ₁₀		PM _{2.5}		SO ₂		Other	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
1 / Feed Hopper	--	--	--	--	0.04	0.01	0.01	<0.01	<0.01	<0.01	--	--	--	--
2 / Conveyor	--	--	--	--	0.08	0.01	0.03	<0.01	0.01	<0.01	--	--	--	--
3 / Silo	--	--	--	--	0.07	0.32	0.07	0.32	0.07	0.32	--	--	--	--
4/ Truck loading	--	--	--	--	0.06	0.01	0.03	0.01	<0.01	<0.01	--	--	--	--
Stockpiles	--	--	--	--	--	0.36	--	0.18	--	0.03	--	--	--	--
TOTAL EMISSIONS (TPY):						0.71		0.51		0.35				
MAXIM/UM OPERATING SCHEDULE:			Hours/Day			Days/Week			Weeks/Year			Hours/Year		8,760

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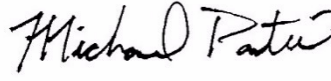
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September 24, 2024

Ms. Jana Banigo
Permit Reviewer
Rule Registration Section

Date



September 26, 2024

Michael Partee, Manager
Rule Registrations Section
Air Permits Division
Section Manager

Date