

From: Kate Gross <KGross@trinityconsultants.com>
Sent: Wednesday, March 12, 2025 9:24 AM
To: Grace King; Daniel CARNES
Cc: Joshua Wheatley; Mitchell McBrayer; Aabhash Khadka
Subject: RE: TCEQ Air Permit No. 179068 / Project No. 388528 at Holcim (Us) Inc.'s Holcim Us site

Grace,

The 1.40 tpy represents the change in permit allowable emission rate for the EPNs (Proposed PTE minus current permit allowable). The 2.60 tpy represents the proposed PTE minus baseline actual emissions from the Table 2F.

Thanks,
Kate

Kate Gross
Principal Consultant
M 214.405.1598

From: Grace King <Grace.King@tceq.texas.gov>
Sent: Tuesday, March 11, 2025 2:49 PM
To: Daniel CARNES <dan.carnes@holcim.com>
Cc: Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>; Kate Gross <KGross@trinityconsultants.com>
Subject: RE: TCEQ Air Permit No. 179068 / Project No. 388528 at Holcim (Us) Inc.'s Holcim Us site

Good afternoon,

After further review, management had some additional questions.

- The 106.261/262 speciation has a total of 2.60 tpy while the emissions summary table has a PM total of 1.40 tpy.
 - Please provide an explanation for this discrepancy.

Failure to submit all of the requested information by **March 13, 2025** 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. Grace King
Rule Registration Team
Air Permits Division, Office of Air, TCEQ
(512) 239-4936

Grace.King@tceq.texas.gov

How are we doing? Fill out our online customer satisfaction survey at www.tceq.texas.gov/customersurvey

From: Grace King
Sent: Thursday, February 27, 2025 7:27 AM
To: Daniel CARNES <dan.carnes@holcim.com>
Cc: Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>; Kate Gross <KGross@trinityconsultants.com>
Subject: RE: TCEQ Air Permit No. 179068 / Project No. 388528 at Holcim (Us) Inc.'s Holcim Us site

Good morning,

My apologies for the confusion. Would you mind sending me the email chain where this project was discussed so I may review it?

Failure to submit all of the requested information by **February 28, 2025** 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.

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From: Daniel CARNES <dan.carnes@holcim.com>
Sent: Thursday, February 27, 2025 7:22 AM
To: Grace King <Grace.King@tceq.texas.gov>
Cc: Joshua Wheatley <Joshua.Wheatley@tceq.texas.gov>; Kate Gross <KGross@trinityconsultants.com>
Subject: Re: TCEQ Air Permit No. 179068 / Project No. 388528 at Holcim (Us) Inc.'s Holcim Us site

Ms. King,

Prior to submitting the PBR/SP applications to the TCEQ, Holcim and Trinity Consultants had correspondence with Michael Partee (TCEQ). In an email he sent to us on December 20 he clearly detailed out the permitting strategy that we submitted. If this is no longer acceptable then Holcim requests a meeting with you and Michael to discuss in person.

On Wed, Feb 26, 2025 at 2:07 PM Grace King <Grace.King@tceq.texas.gov> wrote:

Good afternoon,

After further review of this project with my technical specialist, the emission increases will need to be authorized under the PCP Standard Permit with an impacts analysis conducted for the increases and the 106.261/262 project is not needed.

Please confirm this project should be withdrawn and that an impacts analysis will be submitted for the emission increases for the PCP Standard Permit.

Failure to submit all of the requested information by **February 28, 2025** 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. Grace King

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Grace.King@tceq.texas.gov

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From: Daniel CARNES <dan.carnes@holcim.com>

Sent: Monday, February 10, 2025 3:43 PM

To: Grace King <Grace.King@tceq.texas.gov>

Subject: Re: TCEQ Air Permit No. 179068 / Project No. 388528 at Holcim (Us) Inc.'s Holcim Us site

Grace,

While we did want to keep it in for clarity purposes, that's fine if it needs to be removed also.

Thank you

On Mon, Feb 10, 2025 at 8:59 AM Grace King <Grace.King@tceq.texas.gov> wrote:

Good morning,

Thank you for providing the information below. I have some additional questions in order to complete my review.

- 106.261 can only authorize total new or increased emissions. Even though EPN 33 is being connected to the new dust controllers, there are no new or increased emissions associated with it.

- Please confirm this EPN should be taken off the emissions summary table and the project.

Failure to submit all of the requested information by **February 13, 2025** 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. Grace King

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Grace.King@tceq.texas.gov

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From: Daniel CARNES <dan.carnes@holcim.com>

Sent: Friday, February 7, 2025 11:27 AM

To: Grace King <Grace.King@tceq.texas.gov>

Subject: Re: TCEQ Air Permit No. 179068 / Project No. 388528 at Holcim (Us) Inc.'s Holcim Us site

race,

Thank you for the email. Please find responses to your questions below in **red**.

- Are there any upstream or downstream emissions associated with this project.

There will be no upstream or downstream emissions increases associated with this project.

- It appears EPN 33 has no increases associated with it.
 - o Please confirm if it should be taken off the emissions summary table since there are no emission increases associated with it.

It is correct that there are no increases associated with EPN 33. This EPN is part of the shipping area affected by the represented PBR permit changes, as well as being connected to the new in-line dust collector concurrently authorized via PCP-SP (Standard Permit No. 179067 / Project No. 388527). Thus, there are no requested modifications to this EPN specifically. If appropriate, Holcim would prefer to keep it in the emissions summary table for clarity.

Let us know if you have any additional questions or concerns.

On Thu, Feb 6, 2025 at 11:11 AM Grace King <Grace.King@tceq.texas.gov> wrote:

Good morning,

I am the TCEQ Air Permit Reviewer assigned to the PBR Permit No. 179068 / Project No. 388528 at Holcim (Us) Inc. and Holcim Us in Ellis 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:

- Are there any upstream or downstream emissions associated with this project.

- It appears EPN 33 has no increases associated with it.
 - Please confirm if it should be taken off the emissions summary table since there are no emission increases associated with it.

Failure to submit all of the requested information by **February 13, 2025** 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. Grace King

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