

Rollcon, LLC
8611 Derrington Rd
Houston, TX 77064
www.rollconllc.com
713-375-2380

March 17, 2025

Ms. Nancy Birdsong (MC-163)
Texas Commission on Environmental Quality
12100 Park 35 Circle, Bldg C
Austin, TX 78753

via STEERS

**RE: Rollcon, LLC
Permit-by-Rule (PBR) Registration
30 TAC 106.146**

Dear Mr. Bowers:

On behalf of Rollcon, LLC (Rollcon), enclosed is the required documentation to initiate a Permit by Rule (PBR) application under 30 TAC Chapter 106.146 to relocate a temporary soil stabilization plant (pugmill) currently authorized under PBR Registration 176174L001. The pugmill will be relocated to a site near Dayton, TX in Liberty County.

Rollcon is requesting expedited review of this project. Form APD-EXP has been included in the PBR application. Both the PBR fee and expedited review fee have been paid electronically through STEERS.

We appreciate your assistance with this PBR registration. Please contact Mr. Taylor Cooksey at (713) 375-2324 or by email at tcooksey@rollconLLC.com should you have questions regarding this registration.

Best Regards,

Best Regards,
Rollcon, LLC

Tim Maune
Senior Operations Manager

Enclosures

C: - Joseph Doby, Air Section Manager, TCEQ Region 12 – via STEERS
- File



Rollcon, LLC
Permit - By - Rule Registration (30 TAC 106.146)
Temporary Pugmill Relocation
CN603971698
RN 111962700

March 2025

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1.1 IDENTIFYING AND ADMINISTRATIVE INFORMATION

1.2 Identifying and Administrative Information

Rollcon, LLC (Rollcon) is submitting this Permit-by-Rule (PBR) registration to register a relocation of a temporary soil stabilization plant (pugmill). The pugmill will be located at a site near Dayton, Liberty County, TX.

The pugmill and associated operations are a temporary facility that will eventually be moved to different sites in the future. The site operations will consist of stockpiles, material transfers, a cement silo, and a pugmill. There are not any MSS emissions associated with the operation of the pugmill and associated operations as the emissions from normal operations covers all of the estimated emissions.

This section contains basic identifying information for the site. The following forms are included in this section: Core Data Form, Form PI-7CERT – Certification and Registration for Permits by Rule, Table 1a, and Form APD-EXP – Expedited Permitting Request.

The table shown below is a summary of the potential estimated emissions for the project:

Constituent	Potential Emissions, tpy
PM	0.09
PM ₁₀	0.04
PM _{2.5}	0.01

1.3 Core Data Form



TCEQ Use Only

TCEQ Core Data Form

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

SECTION I: General Information

1. Reason for Submission (If other is checked please describe in space provided.)		
☒ New Permit, Registration or Authorization (Core Data Form should be submitted with the program application.)		
☐ Renewal (Core Data Form should be submitted with the renewal form)	☐ Other	
2. Customer Reference Number (if issued)	Follow this link to search for CN or RN numbers in Central Registry**	3. Regulated Entity Reference Number (if issued)
CN 603971698		RN 111962700

SECTION II: Customer Information

4. General Customer Information		5. Effective Date for Customer Information Updates (mm/dd/yyyy)	
☐ New Customer		☐ Update to Customer Information	
☐ Change in Legal Name (Verifiable with the Texas Secretary of State or Texas Comptroller of Public Accounts)		☐ Change in Regulated Entity Ownership	
The Customer Name submitted here may be updated automatically based on what is current and active with the Texas Secretary of State (SOS) or Texas Comptroller of Public Accounts (CPA).			
6. Customer Legal Name (If an individual, print last name first: eg: Doe, John)		If new Customer, enter previous Customer below:	
7. TX SOS/CPA Filing Number	8. TX State Tax ID (11 digits)	9. Federal Tax ID (9 digits)	10. DUNS Number (if applicable)
11. Type of Customer:	☐ Corporation	☐ Individual	Partnership: ☐ General ☐ Limited
Government: ☐ City ☐ County ☐ Federal ☐ State ☐ Other	☐ Sole Proprietorship	☐ Other:	
12. Number of Employees		13. Independently Owned and Operated?	
☐ 0-20 ☐ 21-100 ☐ 101-250 ☐ 251-500 ☐ 501 and higher		☐ Yes ☐ No	
14. Customer Role (Proposed or Actual) – as it relates to the Regulated Entity listed on this form. Please check one of the following:			
☐ Owner ☐ Operator ☐ Owner & Operator			
☐ Occupational Licensee ☐ Responsible Party ☐ Voluntary Cleanup Applicant ☐ Other:			
15. Mailing Address:			
	City	State	ZIP
16. Country Mailing Information (if outside USA)		17. E-Mail Address (if applicable)	
18. Telephone Number	19. Extension or Code	20. Fax Number (if applicable)	
() -		() -	

SECTION III: Regulated Entity Information

21. General Regulated Entity Information (If 'New Regulated Entity' is selected below this form should be accompanied by a permit application)		
☐ New Regulated Entity	☐ Update to Regulated Entity Name	☒ Update to Regulated Entity Information
The Regulated Entity Name submitted may be updated in order to meet TCEQ Agency Data Standards (removal of organizational endings such as Inc, LP, or LLC.)		
22. Regulated Entity Name (Enter name of the site where the regulated action is taking place.)		
Rapid Mix 400 CV Plant		

23. Street Address of the Regulated Entity: (No PO Boxes)								
	City		State		ZIP		ZIP + 4	
24. County								
Enter Physical Location Description if no street address is provided.								
25. Description to Physical Location:	From the intersection of Hwy 146 and Hwy 90 in Dayton, travel SW on Hwy 90 for 0.86 mile to FM493. Turn Left and continue for 1.52 mile and veer Right before intersecting railroad tracks. Continue for 0.8 mile, site is on the Right.							
26. Nearest City					State		Nearest ZIP Code	
Dayton					TX		77535	
27. Latitude (N) In Decimal:			28. Longitude (W) In Decimal:					
Degrees	Minutes	Seconds	Degrees	Minutes	Seconds			
29. Primary SIC Code (4 digits)		30. Secondary SIC Code (4 digits)		31. Primary NAICS Code (5 or 6 digits)		32. Secondary NAICS Code (5 or 6 digits)		
33. What is the Primary Business of this entity? (Do not repeat the SIC or NAICS description.)								
Cement Treated Bases & Concrete Production								
34. Mailing Address:								
		City		State		ZIP		ZIP + 4
35. E-Mail Address:								
36. Telephone Number			37. Extension or Code			38. Fax Number (if applicable)		
() -						() -		

39. TCEQ Programs and ID Numbers Check all Programs and write in the permits/registration numbers that will be affected by the updates submitted on this form. See the Core Data Form instructions for additional guidance.

☐ Dam Safety	☐ Districts	☐ Edwards Aquifer	☐ Emissions Inventory Air	☐ Industrial Hazardous Waste
☐ Municipal Solid Waste	☒ New Source Review Air	☐ OSSF	☐ Petroleum Storage Tank	☐ PWS
	176174L001			
☐ Sludge	☐ Storm Water	☐ Title V Air	☐ Tires	☐ Used Oil
☐ Voluntary Cleanup	☐ Waste Water	☐ Wastewater Agriculture	☐ Water Rights	☐ Other:

SECTION IV: Preparer Information

40. Name:	Mr. Taylor Cooksey			41. Title:	Project Manager		
42. Telephone Number	43. Ext./Code	44. Fax Number	45. E-Mail Address				
(713) 375-2324		() -	tcooksey@rollconllc.com				

SECTION V: Authorized Signature

46. By my signature below, I certify, to the best of my knowledge, that the information provided in this form is true and complete, and that I have signature authority to submit this form on behalf of the entity specified in Section II, Field 6 and/or as required for the updates to the ID numbers identified in field 39.

Company:	Rollcon, LLC		Job Title:	Senior Operations Manager	
Name(In Print) :	Tim Maune			Phone:	(832) 906-9510
Signature:				Date:	

1.3 PI-7CERT (Certification and Registration for Permits by Rule)

Certification and Registration for Permits by Rule
Form PI-7-CERT
Page 1
Texas Commission on Environmental Quality

I. Registrant Information
A. Company or Other Legal Customer Name: Rollcon, LLC
Company Official Contact Information (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Other _____)
Name: Tim Maune
Title: Senior Operations Manager
Mailing Address: 8611 Derrington Rd.
City: Houston
State: TX
ZIP Code: 77064
Phone: (832) 906-9510
Fax:
Email Address: tmaune@rollconllc.com
<i>All PBR registration responses will be sent via email.</i>
A. Technical Contact Information (☒ Mr. ☐ Mrs. ☐ Ms. ☐ Other _____)
Name: Taylor Cooksey
Title: Project Manager
Company Name: Rollcon, LLC
Mailing Address: 8611 Derrington Rd.
City: Houston
State: TX
ZIP Code: 77064
Phone Number: (713) 375-2324
Fax Number:
Email Address: tcooksey@rollconllc.com

**Certification and Registration for Permits by Rule
Form PI-7-CERT
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II. Facility and Site Information
A. Name and Type of Facility
Facility Name: Rapid Mix 400 CV Plant
Facility Type: ☐ Permanent ☒ Temporary
For portable units, please provide the serial number of the equipment being authorized below.
Serial No(s): RMXV40516112
B. Facility Location Information
Street Address:
If there is no street address, provide written driving directions to the site and provide the closest city or town, county, and ZIP code for the site (attach description if additional space is needed).
From the intersection of Hwy 146 and Hwy 90 in Dayton, travel SW on Hwy 90 for 0.86 mile to FM493. Turn Left and continue for 1.52 mile and veer Right before intersecting railroad tracks. Continue for 0.8 mile, site is on the Right.
City: Dayton
County: Liberty
ZIP Code: 77535
C. TCEQ Core Data Form
Is the Core Data Form (TCEQ Form Number 10400) attached? ☒ YES ☐ NO
If "NO," provide customer reference number (CN) and regulated entity number (RN) below.
Customer Reference Number (CN): 603971698
Regulated Entity Number (RN): RN111962700
D. TCEQ Account Identification Number (if known):
E. Type of Action
☐ Initial Application ☒ Change to Registration
For Change to Registration provide the Registration Number:
F. PBR number(s) claimed under 30 TAC Chapter 106
(List all the individual rule number(s) that are being claimed.)
106.146
106.
106.

**Certification and Registration for Permits by Rule
Form PI-7-CERT**

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II. Facility and Site Information <i>(continued)</i>
G. Historical Standard Exemption or PBR
Are you claiming a historical standard exemption or PBR? ☐ YES ☒ NO
If "YES," enter rule number(s) and associated effective date in the spaces provided below.
Rule Number: Effective Date:
Rule Number: Effective Date:
H. Previous Standard Exemption or PBR Registration Number
Is this authorization for a change to an existing facility previously authorized under a standard exemption or PBR? ☒ YES ☐ NO
If "YES," enter previous standard exemption number(s) and PBR registration number(s) and associated effective dates in the spaces provided below.
Standard Exemption and PBR Registration Number: 176174L001
Effective Date:
I. Other Facilities at this Site Authorized by Standard Exemption, PBR, or Standard Permit
Are there any other facilities at this site that are authorized by an Air Standard Exemption, PBR, or Standard Permit? ☐ YES ☒ NO
If "YES," enter standard exemption number(s), PBR registration number(s), and Standard Permit registration number(s), and associated effective date in the spaces provided below.
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s):
Effective Date:
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s):
Effective Date:
Standard Exemption, PBR Registration, and Standard Permit Registration Number(s):
Effective Date:
J. Other Air Preconstruction Permits
Are there any other air preconstruction permits at this site? ☐ YES ☒ NO
If "YES," enter permit number(s) in the spaces provided below.
K. Affected Air Preconstruction Permits
Does the PBR being claimed directly affect any permitted facility? ☐ YES ☒ NO

Certification and Registration for Permits by Rule
Form PI-7-CERT
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II. Facility and Site Information <i>(continued)</i>
If "YES," enter the permit number(s) in the spaces provided below.
L. Federal Operating Permit (FOP) Requirements (30 TAC Chapter 122 Applicability)
1. Is this facility located at a site that is required to obtain an FOP pursuant to 30 TAC Chapter 122? ☐ YES ☒ NO ☐ To Be Determined
If the site currently has an existing FOP, enter the permit number:
Check the requirements of 30 TAC Chapter 122 that will be triggered if this certification is accepted. <i>(check all that apply)</i>
☐ Initial Application for a FOP ☐ Significant Revision for an SOP ☐ Minor Revision for an SOP
☐ Operational Flexibility/Off Permit Notification for an SOP ☐ Revision for a GOP
☐ To be Determined ☒ None
2. Identify the type(s) of FOP issued and/or FOP application(s) submitted/pending for the site. <i>(check all that apply)</i>
☐ SOP ☐ GOP ☐ GOP application/revision (submitted or under APD review)
☒ N/A ☐ SOP application/revision (submitted or under APD review)
III. Fee Information <i>(See Section VII. for address to send fee or go to www.tceq.texas.gov/epay to pay online.)</i>
A. Fee Requirements
Is a fee required per Title 30 TAC § 106.50? ☒ YES ☐ NO
If "NO," specify the exception. There are three exceptions to paying a PBR fee. <i>(check all that apply)</i>
1. Registration is solely to establish a federally enforceable emission limit. ☐
2. Registration is within six months of an initial PBR review, and it is addressing deficiencies, administrative changes, or other allowed changes. ☐
3. Registration is for a remediation project (30 TAC § 106.533). ☐
B. Fee Amount
1. A \$100 fee is required if <i>any</i> of the answers in III.B.1 are "YES."
This business has less than 100 employees. ☒ YES ☐ NO
This business has less than \$6 million dollars in annual gross receipts. ☐ YES ☒ NO
This registration is submitted by a governmental entity with a population of less than 10,000. ☐ YES ☒ NO
This registration is submitted by a non-profit organization. ☐ YES ☒ NO

Certification and Registration for Permits by Rule
Form PI-7-CERT
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III. Fee Information (See Section VII. for address to send fee or go to www.tceq.texas.gov/epay to pay online.) (continued)
2. A \$450 fee is required for all other registrations
A. Payment Information
Check/money order/transaction or voucher number: via STEERS
Individual or company name on check:
Fee Amount: \$100 (PBR Registration), \$500 (Expedited Review Surcharge)
Was the fee paid online? ☒ YES ☐ NO
IV. Technical Information Including State and Federal Regulatory Requirements Check the appropriate box to indicate what is included in your submittal. NOTE: Any technical or essential information needed to confirm that facilities are meeting the requirements of the PBR must be provided. Not providing key information could result in a deficiency of the project.
A. PBR requirements (Checklists are optional; however, your review will go faster if you provide applicable checklists.)
Did you demonstrate that the general requirements in 30 TAC § 106.4 are met? ☒ YES ☐ NO
Did you demonstrate that the individual requirements of the specific PBR are met? ☒ YES ☐ NO
B. Confidential Information Included (If confidential information is submitted with this registration, all confidential pages must be properly marked "CONFIDENTIAL.") ☐ YES ☒ NO
C. Process Flow Diagram: ☒ YES ☐ NO
D. Process Description: ☒ YES ☐ NO
E. Maximum Emissions Data and Calculations: ☒ YES ☐ NO
Note: If the facilities listed in this registration are subject to the Mass Emissions Cap & Trade program under 30 TAC Chapter 101, Subchapter H, Division 3 , the owner/operator of these facilities must possess NO _x allowances equivalent to the actual NO _x emissions from these facilities.
F. Is this certification being submitted to certify the emissions for the entire site? ☒ YES ☐ NO
If "NO," include a summary of the specific facilities and emissions being certified.
G. Table 1(a) (Form 10153) Emission Point Summary: ☒ YES ☐ NO
H. Distances from Property Line and Nearest Off-Property Structure
Distance from this facility's emission release point to the nearest property line: > 300 feet
Distance from this facility's emission release point to the nearest off-property structure: > 300 feet

Certification and Registration for Permits by Rule
Form PI-7-CERT
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IV. Technical Information Including State and Federal Regulatory Requirements

Check the appropriate box to indicate what is included in your submittal.

NOTE: Any technical or essential information needed to confirm that facilities are meeting the requirements of the PBR must be provided. Not providing key information could result in a deficiency of the project.

I. Project Status

Has the company implemented the project or waiting on a response from TCEQ?

☐ Implemented ☒ Waiting

J. Projected Start of Construction and Projected Start of Operation Dates:

Projected Start of Construction (provide date): ~04/07/2025

Projected Start of Operation (provide date): ~04/07/2025

V. Delinquent Fees

This form **will not be processed** until all delinquent fees and/or penalties owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ is paid in accordance with the Delinquent Fee and Penalty Protocol. For more information regarding Delinquent Fees and Penalties, go to the TCEQ website at: www.tceq.texas.gov/agency/financial/fees/delin/index.html.

VI. Signature For Registration and Certification

The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which this application is made will not in any way violate any provision of the Texas Water Code (TWC), Chapter 7; the Texas Health and Safety Code, Chapter 382, the Texas Clean Air Act (TCAA); the air quality rules of the Texas Commission on Environmental Quality; or any local governmental ordinance or resolution enacted pursuant to the TCAA. I further state that I understand my signature indicates that this application meets all applicable nonattainment, prevention of significant deterioration, or major source of hazardous air pollutant permitting requirements. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.

Name (printed): Tim Maune

Signature (original signature required) Signed in STEERS

Date:

Certification and Registration for Permits by Rule
Form PI-7-CERT
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VII. Submitting Copies of the Certification and Registration

Copies must be sent as listed below.

Processing delays may occur if copies are not sent as noted.

Who	Where	What
Air Permits Initial Review Team (APIRT)	Regular, Certified, Priority Mail MC 161, P.O. Box 13087 Austin, Texas 78711-3087 Hand Delivery, Overnight Mail MC 161, 12100 Park 35 Circle, Building C, Third Floor Austin, Texas 78753	Originals Form PI-7-CERT, Core Data Form, and all attachments. Not required if using ePermits ¹ .
Revenue Section, TCEQ	Regular, Certified, Priority Mail MC 214, P.O. Box 13088 Austin, Texas 78711-3088 Hand Delivery, Overnight Mail MC 214, 12100 Park 35 Circle, Building A, Third Floor Austin, Texas 78753	Original Money Order or Check, Copy of Form PI-7-CERT, and Core Data Form. Not required if fee was paid using ePay ² .
Appropriate TCEQ Regional Office	To find your Regional Office address, go to the TCEQ website at www.tceq.texas.gov/agency/directory/region , or call (512) 239-1250.	Copy of Form PI-7-CERT, Core Data Form, and all attachments. Not required if using ePermits ¹
Appropriate Local Air Pollution Control Program(s)	To Find your local or Regional Air Pollution Control Programs go to the TCEQ, APD website at www.tceq.texas.gov/permitting/air/local_programs.html , or call (512)-239-1250	Copy of Form PI-7-CERT, Core Data Form, and all attachments.

¹ ePermits located at www3.tceq.texas.gov/steers/

² ePay located at www.tceq.texas.gov/epay

1.4 Table 1a

Permit Number:	176174L002	RN Num	111962700	Date:	Mar-25
Company	Rollcon, LLC				

Review of applications and issuance of permits will be expedited by supplying all necessary information requested on this Table.

AIR CONTAMINANT DATA					
1. Emission Point			2. Component or Air Contaminant Name	3. Air Contaminant Emission Rate	
EPN (A)	FIN (B)			Pounds per Hour (A)	TPY (B)
1	1	Material Transfer to Feed Bins	PM	0.07	0.004
			PM10	0.02	0.001
			PM2.5	0.01	0.0003
2	2	Conveyor Transfer from Feed Bins	PM	0.07	0.004
			PM10	0.02	0.001
			PM2.5	0.01	0.0003
3	3	Transfer to Pugmill	PM	0.07	0.004
			PM10	0.02	0.001
			PM2.5	0.01	0.0003
4	4	Truck Load from Pugmill	PM	0.07	0.004
			PM10	0.02	0.001
			PM2.5	0.01	0.0003
5	5	Silo/Bag house	PM	0.04	0.002
			PM10	0.02	0.001
			PM2.5	0.004	0.0002
6	6	Pugmill	PM	0.11	0.006
			PM10	0.04	0.002
			PM2.5	0.003	0.0001
STK	STK	Stockpiles	PM	0.29	0.072
			PM10	0.15	0.036
			PM2.5	0.02	0.005

EPN = Emission Point Number

FIN = Facility Identification Number

1.5 APD-EXP (Expedited Permitting Request)

Form APD-EXP Expedited Permitting Request

I. Contact Information	
Company or Other Legal Customer Name: Rollcon, LLC	
Customer Reference Number (CN): CN603971698	
Regulated Entity Number (RN): 111962700	
Company Official or Technical Contact Name: Tim Maune	
Phone Number: (832) 906-9510	
Email: tmaune@rollconllc.com	
II. Project Information	
Facility Type: Soil Stabilization Plant (Pugmill)	
Permit Number: 176174L002	
Project Number: TBD	
III. Economic Justification	
The purpose of the application associated with this request to expedite will benefit the economy of this state or an area of this state.	☒ YES ☐ NO
IV. Delinquent Fees and Penalties	
Applications will not be expedited if any delinquent fees and/or penalties are owed to the TCEQ or the Office of the Attorney General on behalf of the TCEQ. For more information regarding Delinquent Fees and Penalties, go to the TCEQ Web site at: www.tceq.texas.gov/agency/delin/index.html .	
V. Signature	
The signature below confirms that I have knowledge of the facts included in this application and that these facts are true and correct to the best of my knowledge and belief. As the applicant, I commit to fulfilling all expectations of the expedited permitting program and application requirements promptly. Failure to meet any expectation or requirement may cause my application to be removed from the expedited permitting program and possibly voided at the discretion of the TCEQ Executive Director. The signature further signifies awareness that intentionally or knowingly making or causing to be made false material statements or representations in the application is a criminal offense subject to criminal penalties.	
Name: Tim Maune	
Signature: Signed in STEERS	
Date:	

2.1 PROCESS DESCRIPTION

2.2 Process Description

The soil stabilization base course (Roller Compacted Concrete), is produced by mixing base course with a small percentage of water and Portland cement. The Portland cement when mixed with water forms hydrated cement paste that binds the base course material together when compacted to create a hard surface.

The various sizes of aggregate and sand are added to the feed bins by front-end loader. The material is then transferred by conveyor belt from the feed bins to the weigh hopper where the aggregate material is metered separately by volume. The required amount of cement is then gravity fed from the cement silo to the mixing chamber by a totally enclosed auger. The material is then transferred by an enclosed conveyor belt to the enclosed pugmill for continuous mixing to assure a homogeneous mix of all the materials. From the pugmill the material is then loaded onto trucks for transport to the construction site as needed.

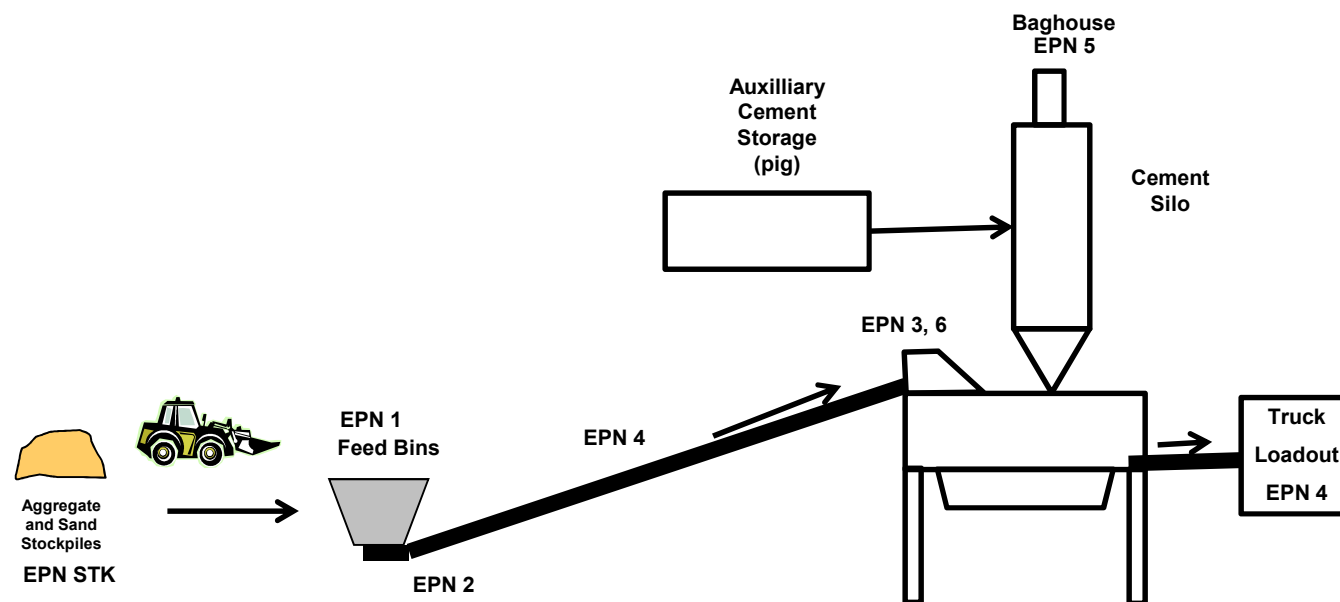
Cement will be delivered by pneumatic dry tanker trucks and pumped into the elevated silo for storage. The silo will be vented to a baghouse located on top of the silo to capture dust emissions during the loading and batching process. An auxiliary bulk storage vessel (pig) will be utilized to store additional cement. The pig will be vented to the primary elevated silo to control emissions.

Stockpiles of coarse aggregate and sand materials will be used to supply the pugmill. The coarse aggregate and sand materials will be transferred from the stockpiles by front end loaders to elevated bins.

2.3 Process Flow Diagram

Process Flow Diagram

EPN STK Aggregate / Sand Stockpiles
EPN 1 Aggregate and Sand Transfer to Feed Bins
EPN 2 Aggregate and Sand Transfer to Conveyor from Feed Bins
EPN 3 Aggregate, Sand, Cement from Conveyor into Pugmill
EPN 4 Truck Load Out from Pugmill
EPN 5 Cement Silo Baghouse
EPN 6 Pugmill



Soil Stabilization Pugmill Plant
Rollcon LLC

Not to Scale

3.0 EMISSIONS CALCULATIONS AND METHODOLOGY

Emissions rates for the material transfers (hopper loading, conveyor transfers, truck loading) and for the pugmill mixer have been calculated using TCEQ's Rock Crusher Emission Factors, Draft, 01/2012 and are based on hourly and project production rates. The wet material factors for the material transfers are utilized since the stockpiles will be sprinkled with water as required in the PBR. The wet screening emission factor is utilized for the pugmill mixer since water is sprayed into the mixer in order to make the product.

Silo loading emissions from the silo baghouse are generated as a result of loading of cement into the silo. Emissions are calculated utilizing the emission factors from AP-42, Table 11.12-2 and utilizing a control efficiency of 99.99% for the cement silo. AP-42 does not currently provide an emission factor for PM_{2.5}; therefore, emissions of PM_{2.5} are estimated at 0.08 lb PM_{2.5}/ton of material loaded per accepted TCEQ methodology.

Emission rates for the stockpiles are calculated using the methodology contained in the TCEQ Technical Guidance for Concrete batch Plants dated January 2001. For the purposes of calculating emissions, only one stockpile calculation has been performed with a total area of 2 acres. Stockpiles will utilize water sprays to minimize dust emissions. Emissions are calculated based on 365 active days per year.

Detailed emission calculations are provided on the following pages. Enclosed behind the calculations is Table 11 and vendor data information for the dust collectors.

Pugmill Emissions Calculations

Plant Throughput	
ton/hr	ton/yr
500	50,300

Pugmill Emissions Calculations

	Material Transfers (Conveyors, Loading) EPNs 1, 2, 3, 4	Pugmill ¹ EPN 6	Silo Baghouse EPN 5
# of like points	4	1	1
Control Efficiency %	0	90	99.99
CF , control factor	1.00	0.10	0.0001
EF , emission factor PM (lb/ton) ²	0.00014	0.0022	0.73
EF , emission factor PM ₁₀ (lb/ton) ²	0.000046	0.00074	0.47
EF , emission factor PM _{2.5} (lb/ton) ²	0.000013	0.00005	0.08
PM (lb/hr)	0.28	0.11	0.04
PM (ton/yr)	0.01	0.01	0.00
PM₁₀ (lb/hr)	0.09	0.04	0.02
PM₁₀ (ton/yr)	0.00	0.00	0.00
PM_{2.5} (lb/hr)	0.03	0.00	0.00
PM_{2.5} (ton/yr)	0.00	0.00	0.00

Note 1: Control efficiency of 90% utilized since pugmill is covered.

Note 2: TCEQ Guidance "Rock Crusher Emission Factors", Draft 01/13/2012.

Sample Calculations (Pugmill as an example, material transfers and silo baghouse calculated similarly)

PM Emissions (lb/hr) = 500 (ton/hr) x 0.0022 (lb/ton) x 0.1 (Control Factor) x 1 (# like points) = 0.11 (lb/hr)

PM Emissions (ton/yr) = 50300 (ton/yr) x 0.0022 (lb/ton) x 0.1 (Control Factor) x 1 (# like points) / 2000 (lb/ton) = 0.01 (ton/yr)

Stockpiles

	EPN STK Aggregate / Sand
A, stockpile area*** (acre)	2
D, number of active days per year (day/yr)	365
CF, control factor <i>see Table A (washed material + water spray)</i>	0.015
E1, inactive stockpile emissions (ton PM/yr)	0.00
E2, inactive stockpile emissions (ton PM ₁₀ /yr)	0.00
E3, active stockpile emissions (ton PM/yr)	0.072
E4, active stockpile emissions (ton PM ₁₀ /yr)	0.036

Emission Equation

$E1 = 3.5 \text{ lb PM/acre-inactive day} \cdot (365-D) / \text{year} \cdot A \cdot CF / 2000$

$E2 = 0.5 \cdot E1$

$E3 = 13.2 \text{ lb PM/acre- active day} \cdot D \cdot A \cdot CF / 2000$

$E4 = 0.5 \cdot E3$

Pollutant (lb/hr) = (Active Emission + Inactive Emission) * 2000 / 8760

Total Stockpile Emissions

EPN STK	
PM (lb/hr)	0.29
PM (ton/yr)	0.07227
PM ₁₀ (lb/hr)	1.5E-01
PM ₁₀ (ton/yr)	0.036
PM _{2.5} (lb/hr)	2.2E-02
PM _{2.5} (ton/yr)	0.0054

Emission calculation with its respective emission factors and control factors was determined using TCEQ Draft Guidance, Concrete Batch Plants, January 2001.

PM_{2.5} Emissions are estimated to be 15% of PM₁₀ emissions.

Emissions Summary

	Material Transfers EPNs 1, 2, 3, 4	Pugmill EPN 6	Silo Baghouse EPN 5	Stockpiles EPN STK	Total Project Emissions
PM (lb/hr)	0.28	0.11	0.04	0.29	0.72
PM (tpy)	0.01	0.01	0.00	0.072	0.09
PM ₁₀ (lb/hr)	0.09	0.04	0.02	0.15	0.30
PM ₁₀ (tpy)	0.00	0.00	0.00	0.0361	0.04
PM _{2.5} (lb/hr)	0.03	0.003	0.004	0.0219	0.05
PM _{2.5} (tpy)	0.00	0.000	0.000	0.0054	0.01



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Bin Vent dust collector type FNW4J40

Specifications:	
filtering elements	POLYPLEATS
element count	14
element size	W= 16.5", L= 30"
dust collector filtering surface	430 sqft
recommended air/cloth ratio	5:1
filtering media	Pleated non-woven polyester PP, 265 gr/sqm
pressure drop	4" H2O
max. design air capacity	2252 CFM
cleaning system	pulse Jet with compressed air at 80 PSI, incl. electronic timer board
number of solenoid valves	6
Filtration efficiency (at Standard Test Conditions)	99.99%
housing material	Stainless steel
dust collector weight	336 lbs



Texas Commission on Environmental Quality

**Table 11
Fabric Filters**

Tables, checklists, and guidance documents pertaining to air quality permits are available from the Texas Commission on Environmental Quality (TCEQ) Air Permits Division (APD) website at www.tceq.texas.gov/permitting/air.

A. Emission Point Number (EPN) and Emission Point Name				
EPN: EPN5		Emission Point Name: EPN5		
B. Manufacturer and Model Numbers (No.)				
Manufacturer No.: Wameco		Model No.:		
C Name of Source(s) or Equipment Being Controlled				
Name	EPN	FIN		
Silo				
D. Type of Particulate Controlled				
Cement				
E. Gas Stream Characteristics				
Design Maximum	Average Expected Flow Rate (acfm)	Gas Stream Temperature (°F)	Particulate Grain Loading (grain/scf)	
2252		Ambient	Inlet:	Outlet: <0.01
Pressure Drop (inches of H ₂ O)	Water Vapor Content of Effluent Stream (lb water/lb dry air)		Fan Requirements	
4"	Ambient		hp:	ft ³ /min.: 2252
F. Particulate Distribution (By Weight)				
Micron Range	Inlet %	Outlet %		
0.0-0.5				
0.5-1.0				
1.0-5.0		PM _{2.5} -10.96%		
5-10		PM ₁₀ -64.38%		
10-20				
over 20		PM (larger than PM ₁₀)-25.66%		
G. Filter Characteristics				
Filtering Velocity (acfm/ft ² of Cloth)	Bag Diameter (inches)	Bag Length (feet)	Total Number of Bags	
5			14	

Texas Commission on Environmental Quality

**Table 11
Fabric Filters**

H. Bag Rows	
Indicate the arrangement of the baghouse bag filter rows.	☐ Staggered ☐ Straight
I. Walkways	
Will walkways be provided between banks of bags?	☐ YES ☒ NO
J. Filtering Material	
Identify the filtering media: Polyester Cartridge	
Any additional coating or treatment of the baghouse material:	
K. Cleaning of the Filter(s)	
Describe Bag Cleaning Method and Cycle: Pulse Jet	
L. Cost	
Capital Installed Cost:	
Annual Operating Cost:	

Note: Attach the details regarding the principle of operation and an assembly drawing (front and top view) of the abatement device drawn to scale clearly showing the design, size and shape.

If the device has bypasses, safety valves, etc., include in the drawing and specify when such bypasses are to be used and under what conditions.

Reset Form

Print Form

4.1 PBR CHECKLISTS

4.2 106.4 Checklist

Texas Commission on Environmental Quality
Permit by Rule Applicability Checklist
Title 30 Texas Administrative Code § 106.4

The following checklist was developed by the Texas Commission on Environmental Quality (TCEQ), **Air Permits Division**, to assist applicants in determining whether or not a facility meets all of the applicable requirements. Before claiming a specific Permit by Rule (PBR), a facility must first meet all of the requirements of **Title 30 Texas Administrative Code § 106.4** (30 TAC § 106.4), "Requirements for Permitting by Rule." Only then can the applicant proceed with addressing requirements of the specific Permit by Rule being claimed.

The use of this checklist is not mandatory; however, it is the responsibility of each applicant to show how a facility being claimed under a PBR meets the general requirements of 30 TAC § 106.4 and also the specific requirements of the PBR being claimed. If all PBR requirements cannot be met, a facility will not be allowed to operate under the PBR and an application for a construction permit may be required under 30 TAC § 116.110(a).

Registration of a facility under a PBR can be performed by completing **Form PI-7** (Registration for Permits by Rule) or **Form PI-7-CERT** (Certification and Registration for Permits by Rule). The appropriate checklist should accompany the registration form. Check the most appropriate answer and include any additional information in the spaces provided. If additional space is needed, please include an extra page and reference the question number. The PBR forms, tables, checklists, and guidance documents are available from the TCEQ, Air Permits Division website at: www.tceq.texas.gov/permitting/air/nav/air_pbr.html.

1. 30 TAC § 106.4(a)(1) and (4): Emission Limits	Answer
List emissions in tpy for each facility (add additional pages or table if needed): See Table 1a	
Are the SO ₂ , PM ₁₀ , VOC, or other air contaminant emissions claimed for each facility in this PBR submittal less than 25 tpy?	☒ YES ☐ NO
Are the NO _x and CO emissions claimed for each facility in this PBR submittal less than 250 tpy?	☒ YES ☐ NO
<i>If the answer to both is "Yes," continue to the question below. If the answer to either question is "No," a PBR cannot be claimed.</i>	
Has any facility at the property had public notice and opportunity for comment under 30 TAC Section 116 for a regular permit or permit renewal? (This does not include public notice for voluntary emission reduction permits, grandfathered existing facility permits, or federal operating permits.)	☐ YES ☒ NO
<i>If "Yes," skip to Section 2. If "No," continue to the questions below.</i>	
If the site has had no public notice, please answer the following:	
Are the SO ₂ , PM ₁₀ , VOC, or other emissions claimed for all facilities in this PBR submittal less than 25 tpy?	☒ YES ☐ NO
Are the NO _x and CO emissions claimed for all facilities in this PBR submittal less than 250 tpy?	☒ YES ☐ NO
<i>If the answer to both questions is "Yes," continue to Section 2.</i>	
<i>If the answer to either question is "No," a PBR cannot be claimed. A permit will be required under Chapter 116.</i>	

Texas Commission on Environmental Quality
Permit by Rule Applicability Checklist
Title 30 Texas Administrative Code § 106.4

2. 30 TAC § 106.4(a)(2): Nonattainment Check	Answer
Are the facilities to be claimed under this PBR located in a designated ozone nonattainment county?	☒ YES ☐ NO
<i>If "Yes," please indicate which county by checking the appropriate box to the right.</i>	
(Moderate) - Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, and Waller counties:	☒ HGB
(Moderate) - Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise counties:	☐ DFW
<i>If "Yes," to any of the above, continue to the next question. If "No," continue to Section 3.</i>	
Does this project trigger a nonattainment review?	☐ YES ☒ NO
Is the project's potential to emit (PTE) for emissions of VOC or NO _x increasing by 100 tpy or more?	☐ YES ☒ NO
<i>PTE is the maximum capacity of a stationary source to emit any air pollutant under its worst-case physical and operational design unless limited by a permit, rules, or made federally enforceable by a certification.</i>	
Is the site an existing major nonattainment site and are the emissions of VOC or NO _x increasing by 40 tpy or more?	☐ YES ☒ NO
<i>If needed, attach contemporaneous netting calculations per nonattainment guidance.</i>	
Additional information can be found at: www.tceq.texas.gov/permitting/air/forms/newsource/tables/nsr_table8.html and www.tceq.texas.gov/permitting/air/nav/air_docs_newsource.html	
<i>If "Yes," to any of the above, the project is a major source or a major modification and a PBR may not be used. A Nonattainment Permit review must be completed to authorize this project. If "No," continue to Section 3.</i>	
3. 30 TAC § 106.4(a)(3): Prevention of Significant Deterioration (PSD) check	
Does this project trigger a review under PSD rules?	
To determine the answer, review the information below:	
Are emissions of any regulated criteria pollutant increasing by 100 tpy of any criteria pollutant at a named source?	☐ YES ☒ NO
Are emissions of any criteria pollutant increasing by 250 tpy of any criteria pollutant at an unnamed source?	☐ YES ☒ NO
Are emissions increasing above significance levels at an existing major site?	☐ YES ☒ NO
PSD information can be found at: www.tceq.texas.gov/assets/public/permitting/air/Forms/NewSourceReview/Tables/10173tbl.pdf and www.tceq.texas.gov/permitting/air/nav/air_docs_newsource.html	
<i>If "Yes," to any of the above, a PBR may not be used. A PSD Permit review must be completed to authorize the project.</i>	
<i>If "No," continue to Section 4.</i>	

Texas Commission on Environmental Quality
Permit by Rule Applicability Checklist
Title 30 Texas Administrative Code § 106.4

4. 30 TAC § 106.4(a)(6): Federal Requirements	Answer
Will all facilities under this PBR meet applicable requirements of Title 40 Code of Federal Regulations (40 CFR) Part 60, New Source Performance Standards (NSPS)?	☐ YES ☐ NO ☒ NA
If "Yes," which Subparts are applicable? (<i>answer below.</i>)	
Will all facilities under this PBR meet applicable requirements of 40 CFR Part 63, Hazardous Air Pollutants Maximum Achievable Control Technology (MACT) standards?	☐ YES ☐ NO ☒ NA
If "Yes," which Subparts are applicable? (<i>answer below.</i>)	
Will all facilities under this PBR meet applicable requirements of 40 CFR Part 61, National Emissions Standards for Hazardous Air Pollutants (NESHAPs)?	☐ YES ☐ NO ☒ NA
If "Yes," which Subparts are applicable? (<i>answer below.</i>)	
<i>If "Yes" to any of the above, please attach a discussion of how the facilities will meet any applicable standards.</i>	
5. 30 TAC § 106.4(a)(7): PBR prohibition check	
Are there any air permits at the site containing conditions which prohibit or restrict the use of PBRs?	☐ YES ☒ NO
<i>If "Yes," PBRs may not be used or their use must meet the restrictions of the permit. A new permit or permit amendment may be required.</i>	
List permit number(s):	
6. 30 TAC § 106.4(a)(8): NO_x Cap and Trade	
Is the facility located in Harris, Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, or Waller County?	☒ YES ☐ NO
<i>If "Yes," answer the question below.</i>	
<i>If "No," continue to Section 7.</i>	
Will the proposed facility or group of facilities obtain required allowances for NO _x if they are subject to 30 TAC Chapter 101, Subchapter H, Division 3 (relating to the Mass Emissions Cap and Trade Program)?	☐ YES ☒ NO

Texas Commission on Environmental Quality
Permit by Rule Applicability Checklist
Title 30 Texas Administrative Code § 106.4

7. Highly Reactive Volatile Organic Compounds (HRVOC) check		
Is the facility located in Harris County?	☐ YES ☒ NO	
<i>If "Yes," answer the next question. If "No," skip to the box below.</i>		
Will the project be constructed after June 1, 2006?	☒ YES ☐ NO	
<i>If "Yes," answer the next question.</i>		
<i>If "No," skip to the box below.</i>		
Will one or more of the following HRVOC be emitted as a part of this project?	☐ YES ☒ NO	
<i>If "Yes," complete the information below:</i>		
Information	lb/hr	tpy
▶ 1,3-butadiene		
▶ all isomers of butene (e.g., isobutene [2-methylpropene or isobutylene])		
▶ alpha-butylene (ethylethylene)		
▶ beta-butylene (dimethylethylene, including both cis- and trans-isomers)		
▶ ethylene		
▶ propylene		
Is the facility located in Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, or Waller County?	☒ YES ☐ NO	
<i>If "Yes," answer the next question. If "No," the checklist is complete.</i>		
Will the project be constructed after June 1, 2006?	☒ YES ☐ NO	
<i>If "Yes," answer the next question. If "No," the checklist is complete.</i>		
Will one or more of the following HRVOC be emitted as a part of this project?	☐ YES ☒ NO	
<i>If "Yes," complete the information below:</i>		
Information	lb/hr	tpy
▶ ethylene		
▶ propylene		

4.3 106.146 Compliance

The PBR Requirements are provided in this section. Rollcon has provided information describing how each PBR requirement is met in **Bold Font** following each PBR requirement.

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

(1) 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.

The cement silo and pig is equipped with a dedicated silo baghouse filtration system with automatic air cleaning. The filtering velocity is less than 7.0 ft/min.

(2) All conveyor belts transferring dry material to the pug mill shall be top covered.

All conveyor belts transferring dry material to the pugmill are covered.

(3) The pug mill used to mix the materials shall be covered.

The pugmill will be covered when in use.

(4) All permanent in-plant roads and vehicle work areas shall be watered, oiled, or paved and cleaned as necessary to achieve maximum control of dust emissions.

All permanent in-plant roads will be watered as required to control dust emissions.

(5) An audible and/or visible mechanism shall be installed on the storage silo(s) to notify operators that the silo is full.

The cement silo will be equipped with an audible and/or visible mechanism to notify operators when the silo is full.

(6) All stockpiles shall be sprinkled with water and/or chemicals as necessary to achieve maximum control of dust emissions.

All stockpiles will be watered as required to control dust emissions.

(7) When emulsified asphalt is used as the stabilizing admixture, the emulsified asphalt shall be stored in a container used exclusively for emulsified asphalt storage. Transfer of emulsified asphalt from the storage tank to the pug mill shall be accomplished by means of a pump and metering device.

N/A. Emulsified asphalt will not be utilized in the mixture.

(8) Before construction of the facility begins, written site approval shall be received from the executive director and the facility shall be registered with the commission's Office of Permitting, Remediating, and Registration in Austin using Form PI-7.

Rollcon understands that written site approval is required prior to construction of the pugmill facilities.

(9) The facility shall be located at least 300 feet 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.

The pugmill will be located at a distance greater than 300 feet from any recreational area, school, residence, or other off-site receptor. An area map showing the distance is attached after this section.

Source Note: The provisions of this §106.146 adopted to be effective March 14, 1997, 22 TexReg 2439; amended to be effective September 4, 2000, 25 TexReg 8653

Benchmark
30 Deg. 0 Min 9.8 sec North
94 Deg. 54 Min 51.6 sec West

Rollcon, LLC Omnisource Site



Benchmark
30 Deg. 0 Min 9.8 sec North
94 Deg. 54 Min 51.6 sec West

Rollcon, LLC Omnisource Site



DISTRIBUTION

Texas Commission on Environmental Quality
Permit By Rule Registration, 106.146
Rollcon, LLC
March 2025

Copy 1: Taylor Cooksey
Rollcon, LLC
8611 Derrington Rd..
Houston, TX 77064

Copy 2: TCEQ Air Permits Initial Review Team (MC-163)
TCEQ - Austin
12100 Park 35 Circle
Austin, Texas 78753
(Via STEERS which includes regional and local programs)