

Permit by Rule (PBR) Registration Technical Review

Company:	Exero Well Integrity LLC	Registration No.:	172875
Nearest City:	Moore	Project No.:	394770
County:	Frio	Project Type:	Revision
Project Reviewer:	Amanda Hernandez	Regulated Entity No.:	RN108881111
Unit Name:	Cement Bulk Handling Facility	Customer Reference No.:	CN606143782
PBR No(s).:	106.144	Project Received Date:	June 26, 2025
Physical Location:	15931 N Ih 35		

Project Overview / Process Description

Exero Well Integrity is a cement supplier for oil and gas operations and is currently authorized under PBR 172875 and PBR 137275, as part of this revision Exero is requesting to void PBR 137275. All facilities at the site will now be authorized under PBR 172875. This revision includes updates to emission factors, authorizes production increases, and adds 3 new product tanks (which increases the site’s capacity by 4,800 cubic feet). This site will be solely authorized under this PBR upon issuance of this permit.

Exero Well Integrity LLC owns and operates a bulk Cement supply site, located in Frio County, Texas. Exero Well Integrity LLC is revising and certifying their cement bulk handling facility under PBR 106.144. Emission rates from loading, blend train, and fugitives are included in this registration. Exero Well Integrity LLC is claiming PBR §106.263 regarding routine maintenance, startup, and shutdown (MSS) of Facilities.

Bulk cement is brought to the facility via tank trucks and loaded into storage silos using enclosed air-slide pneumatic trucks which are connected to the load line and blown down into the main vent silo. The baghouse on the main vent silo collects dust emissions with a 99% capture efficiency. Bulk cement is drawn by vacuum from silos into the blend tank. The bag house control efficiency is 99% and controlled emission factors used to estimate emissions can be found in table 11.12-2 under AP-42.

The blend tanks are used to mix cement with various additives, the required amount of cement and additives are placed in the first tank, then transferred pneumatically three times per batch to homogenize the blend. The mixing process only involves handling dry solid materials. No liquid is added to the product on this site.

After the transfers are processed by the blend tanks, the product is loaded onto a pneumatic trailer (which is connected into our dust collection system) for off-site transportation. The junk tank is where we blow down residual products from trucks returning from the field. It is also where the dust collection system is plumbed into. The tank is generally emptied once a month.

Maximum hourly emissions were calculated based on 31,108 pounds per hour loading of bulk materials. Maximum annual emissions were calculated based on 138,000 tons per year of cement bulk materials.

Permit by Rule Requirements - 30 TAC Chapter 106

General Requirements

Registration Fee Reference No.:	Application fee: 772615 / 582EA000674054
Is this registration certified?	Yes
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.	N/A
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? Sitewide PBR authorized facilities less than the § 106.4(a)(4) limits	Yes
Are there permit limits on using PBRs at the site?	No

Permit by Rule (PBR) Registration

Registration No. 172875
Page 2

Project No. 394770

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

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?	N/A
Are there any applicable standards under NSPS, NESHAP, or NESHAP for source categories (MACT)?	No

Permit by Rule Requirements - Compliance Demonstrations

PBR 106.144 Bulk Mineral Handling

All bulk mineral product (except asbestos) handling facilities that operate in compliance with the following conditions of this section are permitted by rule.

- (1) All material shall be transported in a closed conveying system and all exhaust air to the atmosphere shall be vented through a fabric filter having a maximum filtering velocity of **7.0 ft/min with automatic air cleaning**.
- (2) All permanent in-plant roads and vehicle work areas shall be **watered** as necessary to achieve maximum control of dust emissions.
- (3) The facility (including associated stationary equipment and stockpiles) shall be located at least 300 feet (**actual: >300 feet**) from any recreational area, school, residence, or other structure not occupied or used solely by the owner of the property upon which the facility is located.
- (4) Before construction begins, written site approval must be received from the executive director and the facility shall be registered with the commission's Office of Permitting, Remediation, and Registration in Austin using Form **PI-7CERT**.

Compliance History and Site Review

In accordance with 30 TAC Chapter 60, a compliance history report was reviewed on:		June 27, 2025
Site rating / classification:	Unclassified	Company rating / classification: Unclassified
Has any action occurred on the basis of the compliance history or rating?		No
Did the Regional Office provide site approval and confirm distances?	Due to high workload demands Region 13 did not respond to RFC. Reviewer confirmed distances per 106.144 Checklist.	
Reviewed by: Amanda Hernandez	Date: 07/11/2025	

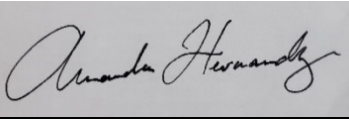
Emission Summary

EPN / Emission Source	VOC		NOx		PM		PM ₁₀		PM _{2.5}		Other	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy
Revised Emissions												
EPN 1 / Main Vent Silo Baghouse	---	---	---	---	0.02	0.07	0.01	0.02	0.01	0.02	---	---
EPN 2 / Additives Transfer Baghouse	---	---	---	---	0.02	0.07	0.01	0.02	0.01	0.02	---	---
EPN 3 / Blend Tank Baghouse	---	---	---	---	0.02	0.07	0.01	0.02	0.01	0.02	---	---
TOTAL EMISSIONS (TPY):		---		---		0.21		0.06		0.06		---
MAXIMUM OPERATING SCHEDULE: Hours/Year											7,488	

Permit by Rule (PBR) Registration

Registration No. 172875
Page 3

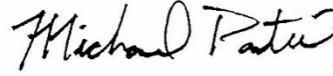
Project No. 394770



07/14/2025

Date

Ms. Amanda Hernandez
Permit Reviewer
Rule Registration Section



07/14/2025

Date

Michael Partee, Manager
Rule Registrations Section
Air Permits Division