Texas Commission on Environmental Quality
INTEROFFICE MEMORANDUM

TO: Office of Chief Clerk

Date: May 22, 2025

FROM: Amanda Kraynok
Staff Attorney
Environmental Law Division

SUBJECT: Transmittal of Documents for Administrative Record

Applicant:	BM Dorchester LLC
Proposed Permit Nos.:	167047, GHGPSDTX212, & PSDTX1602
Program:	Air
Docket Nos.:	TCEQ Docket No. 2025-0482-AIR SOAH Docket No. 582-25-17420

In a contested case hearing, the administrative record includes copies of the public notices relating to the permit application, as well as affidavits of public notices that are filed by the Applicant directly with the Office of the Chief Clerk (OCC). In addition, the record includes the documents listed below that are provided to the OCC by the Executive Director's staff, as required by 30 Tex. Admin. Code § 80.118.

This transmittal serves to also request that the OCC transmit the attached items and the public notice documents, including the notice of hearing, to the State Office of Administrative Hearings.

Documents included with this transmittal are indicated below:

- The final draft permit, including any special conditions or provisions;
- Maximum Allowable Emission Rate Table (MAERT);
- The summary of the technical review of the permit application;
- The First Air Quality Analysis Audit memoranda;
- The Second Air Quality Analysis Audit memoranda;
- The Third Air Quality Analysis Audit memoranda;
- The compliance summary of the Applicant;
- The Executive Director's Preliminary Determination Summary (PDS);
- The Executive Director's Response to Public Comment (RTC) on the Permit Application;
- The RTC Transmittal Letter; and
- The List of Actions from the Commissioner's Integrated Database (CID).

Emission Standards

1. This permit authorizes only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates" (MAERT), and these sources are restricted to the emission limits and other conditions specified in that attached table. In addition to the emissions from routine operations, this permit authorizes emissions from planned maintenance, startup, and shutdown (MSS) activities, and those emissions shall comply with the limits specified in the MAERT. Attachment A identifies the inherently low emitting (ILE) planned maintenance activities that are authorized by this permit.

Fuel Specifications

2. Fuel for the Cement Kiln (EPN 21-SK-230) and the Finish Mill Air Heater (EPN 51-SK-250) shall be limited to natural gas containing no more than 5 grains of total sulfur per 100 dry standard cubic feet (dscf).

3. Fuel for the Emergency Generator Engine (EPN EG-1) shall be pipeline quality natural gas. Use of any other fuel will require prior approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ).

4. Upon request by the Executive Director of the TCEQ or the TCEQ Regional Director or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuels used in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis.

Federal Applicability

5. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources in 40 CFR Part 60, specifically the following:

   A. Subpart A – General Provisions;

   B. Subpart F – Portland Cement Plants;

   C. Subpart OOO – Nonmetallic Mineral Processing Plants; and

   D. Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

6. These facilities shall comply with all applicable requirements of the EPA Regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63, specifically the following:

   A. Subpart A – General Provisions;

   B. Subpart LLL – Portland Cement Manufacturing Industry; and

   C. Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines.

7. If any condition of this permit is more stringent than the regulations so incorporated, then for the purposes of complying with this permit, the permit shall govern and be the standard by which compliance shall be demonstrated.

Opacity/Visible Emission Limitations

8. Opacity of particulate matter emissions from all dust collector (baghouse) stacks shall not exceed 5 percent, averaged over a six-minute period. All other sources listed on the MAERT shall be limited to 10 percent opacity, averaged over a six-minute period.

9. Visible fugitive emissions shall not leave the property for more than 30 cumulative seconds in any six-minute period.

Operational Limitations, Work Practices, and Plant Design

10. Emission rates are based on and the kiln shall be limited to maximum clinker production rates of 3,333 short tons per day and 1,066,560 short tons during a rolling 12-month period.

11. Emissions from the facilities shall not exceed the following:

Table 1: Cement Kiln Baghouse Stack (EPN 21-SK-230) Emission Limits (Excluding Planned Maintenance, Startup, and Shutdown)

Pollutant	1-Hr Average Limitation	Short Term Limit – 30 day Rolling Average (except as noted)	Rolling 12 Month/Annual Limit
PM (condensable)	0.28 lb/ton of clinker	0.28 lb/ton of clinker	0.28 lb/ton of clinker
PM (filterable)	0.02 lb/ton of clinker	0.02 lb/ton of clinker	0.02 lb/ton of clinker
PM_{10} (filterable)	0.02 lb/ton of clinker	0.02 lb/ton of clinker	0.02 lb/ton of clinker
$PM_{2.5}$ (filterable)	0.02 lb/ton of clinker	0.02 lb/ton of clinker	0.02 lb/ton of clinker
CO	9.00 lb/ton of clinker	9.00 lb/ton of clinker	3.00 lb/ton of clinker
NO_x	0.54 lb/ton of clinker	0.54 lb/ton of clinker	0.54 lb/ton of clinker
SO_2	0.60 lb/ton of clinker	0.40 lb/ton of clinker	0.40 lb/ton of clinker
VOC (as THC)	24 ppmvd corrected to 7% O2	24 ppmvd corrected to 7% O2	24 ppmvd corrected to 7% O2
O-HAP	--	12 ppmvd corrected to 7% O2	12 ppmvd corrected to 7% O2

Pollutant	1-Hr Average Limitation	Short Term Limit – 30 day Rolling Average (except as noted)	Rolling 12 Month/Annual Limit
Dioxins and Furans	--	0.20 nanograms per dry standard cubic meter (TEQ), corrected to 7 % O2	0.20 nanograms per dry standard cubic meter (TEQ), corrected to 7 % O2
H_2SO_4	1.10 lb/ton of clinker	--	0.11 lb/ton of clinker
HCl	--	3 ppmvd corrected to 7% O2	3 ppmvd corrected to 7% O2
NH_3	35 ppmv corrected to 7% O2	35 ppmv corrected to 7% O2	35 ppmvd corrected to 7% O2
Hg	--	0.000021 lb/ton of clinker	0.000021 lb/ton of clinker
Pb	--	7.50E-05 lb/ton of clinker	7.50E-05 lb/ton of clinker

12. The Emergency Generator Engine (EPN EG-1) shall be limited to 100 hours per year for maintenance and readiness testing as defined at 40 CFR §60.4243(d). The engine shall be equipped with a non-resettable hour meter.

Bagfilters, Scrubber, and Dry Sorbent Injection System

13. Fabric filter dust collectors shall be designed to meet the maximum outlet grain loading values listed in the table below, in units of grain per dry standard cubic foot (gr/dscf) of exhaust. The dust collectors shall be properly installed and in good working order and shall control particulate matter emissions, when this equipment is in operation, from the following sources:

Table 2: Fabric Filter Dust Collector Maximum Filterable Outlet Grain Loading Values

EPN	Source Name	Maximum Filterable Outlet Grain Loading (gr/dscf)
21-SK-230	Cement Kiln	0.002
51-SK-250	Finish Mill	0.005
10-BF-035	Crusher Building	0.0025
10-BF-140	Material Transfer (LS to Storage)	0.0025
12-BF-140	Additive Unloading (Rail)	0.0025
11-BF-270	Material Transfer (LS to Hopper)	0.0025
11-BF-285	Material Transfer (LS to Hopper)	0.0025
12-BF-315	Truck Unloading	0.0025
12-BF-325	Material Transfer (Rail Add. to Storage)	0.0025

EPN	Source Name	Maximum Filterable Outlet Grain Loading (gr/dscf)
12-BF-360	Material Transfer (Truck Add. to Storage)	0.0025
13-BF-030	Raw Mill Feed (Top of Bin Baghouse)	0.0025
13-BF-500	Raw Mill Feed Bin Building	0.0025
20-BF-010	Raw Mill Building	0.0025
20-BF-182	Raw Mill Building	0.0025
20-BF-360	Raw Mill Building	0.0025
21-BF-330	Top of CKD Bin	0.0025
22-BF-060	Bottom of Raw Meal Silo	0.0025
22-BF-080	Preheater Tower	0.0025
22-BF-160	Top of Raw Meal Silo	0.0025
22-BF-385	Top of Surge Bin (RM Silo)	0.0025
30-BF-260	Bottom of Preheater Tower	0.0025
30-BF-320	Top of Preheater Tower	0.0025
42-BF-270	Cooler Discharge	0.0025
41-BF-130	Top of Bin (Bypass Dust)	0.0025
44-BF-030	Top of Clinker Silo Baghouse	0.0025
44-BF-185	Transfer Tower (Clinker Strg. And Handling)	0.0025
50-BF-050	Top of Clinker Feed Bin	0.0025
50-BF-020	Top of Gypsum Feed Bin	0.0025
50-BF-350	Cement Feed Bin Extraction	0.0025
51-BF-050	Cement Mill Building	0.0025
51-BF-140	Cement Mill Building	0.0025
51-BF-350	Top of Cement Silo (Bucket Elevator Discharge)	0.0025
51-BF-380	Bottom of Cement Silo (Bucket Elevator Feed)	0.0025
52-BF-110	Top of Cement Silo 1	0.0025
53-BF-110	Top of Cement Silo 2	0.0025
52-BF-190	Top of Surge Bin (CM Silo-1)	0.0025
53-BF-190	Top of Surge Bin (CM Silo-2) B	0.0025
52-BF-270	Loadout System (CM Silo-1)	0.0025
53-BF-270	Loadout System (CM Silo-2) Baghouse	0.0025

14. Acids and Sulfur compounds from the Kiln and associated systems shall be directed to a dry scrubbing system in order to meet the Kiln emission limitations found in this permit. Additionally, a bypass system consisting of a quenching chamber, a baghouse with lime injection, and a fan may be utilized. The dry scrubber and/or bypass system shall meet the following requirements:

    A. The scrubber and/or bypass system shall operate with no less than the specified control efficiency for the following pollutants on a 1-hour average basis or 30-day rolling average basis, as required by Special Condition Number 11:

Pollutant:	Control Efficiency
SO_2	90

    B. Prior to the start of operations of the facilities covered by this permit, the permit holder shall obtain a permit alteration or permit amendment which updates the application representations relating to monitoring, target pollutants, and control efficiencies for the scrubber and bypass system.

Material Handling and Housekeeping

15. Limestone Stockpiles 1 and 2, the Gypsum Stockpile, the High Grade Limestone Stockpile, the Sand Stockpile, and in general all incoming raw materials shall be stored in fully enclosed storage buildings.

16. The following material handling operations shall utilize the specified controls:

Table 3: Material Handling Operation Controls

EPN	Source Name	Controls
TRK_MH	Additive - Material Handling Truck Unloading	Three-sided walls and fogging nozzles.
RR_MH	Additive - Material Handling Rail Unloading	Two-sided walls and fogging nozzles.
LSCRSHBD_MH	Limestone – Material Handling LS Crusher Building	Three-sided walls and fogging nozzles.

Dustless telescopic spouts shall be used for loading trucks or rail from bins or silos.

17. Raw material conveyers shall be fully enclosed.

18. Plant roads shall be paved and cleaned, as necessary, to control the emission of dust to the minimum level possible under existing conditions. Haul roads shall be sprinkled with water and/or chemicals, as necessary, to maintain compliance with all applicable TCEQ rules and regulations. Blasting shall not be utilized on site to acquire raw materials for cement production.

19. A street sweeper and other mobile equipment shall pick up debris from the plant roads. The street sweeper will be a full-sized truck which can be driven to the mined-out quarry to dispose of the debris collected.

20. Material collected by air pollution abatement equipment which is not returned to the process shall be disposed of on-site in a manner that minimizes any emissions in transit and prevents any emissions after disposal.

21. The holder of this permit shall physically identify and mark in a conspicuous location all equipment that has the potential of emitting air contaminants as follows:

    A. The facility identification numbers as submitted to the Emissions Inventory Section of the TCEQ.

    B. The emission point numbers as listed on the MAERT.

Cement Kiln Selective Catalytic Reduction

22. The following requirements shall apply to the Cement Kiln (EPN 21-SK-230).

    A. Emissions of NO_x, CO, and NH_3 from the Cement Kiln shall not exceed the values specified in Special Condition 11. Compliance with the NO_x emissions limits shall be achieved through the use of a Selective Catalytic Reduction (SCR) system or combination of SCR and Selective Non-Catalytic Reduction (SNCR) system.

    B. Aqueous ammonia shall be used in the SCR system or combination of SCR and SNCR system and shall have a concentration of no more than 19% ammonia by weight. The aqueous ammonia shall be stored in pressure vessels.

    C. Concentration of a pollutant in the exhaust of the cement kiln shall be evaluated on a dry basis, corrected to 7% oxygen.

    D. Compliance with the NO_x and CO emission limits of these Special Conditions shall be demonstrated through use of Continuous Emissions Monitoring System (CEMS).

Planned Maintenance, Startup, and Shutdown

23. The holder of this permit shall minimize emissions during planned MSS activities by operating the facility and associated air pollution control equipment in accordance with good air pollution control practices, safe operating practices, and protection of the facility.

24. The emissions during planned startup and shutdown activities of the Cement Kiln shall be minimized as follows:

    A. When the precalciner operating temperature is too low for SCR or combination of SCR and SNCR to be engaged, the main kiln burner shall be operated in low-heat input mode and no feed shall be allowed to enter the kiln.

    B. The feed entering the preheater shall not be introduced into the system until the SCR or combination of SCR and SNCR system is at temperature and fully operational.

25. The emissions from ILE planned maintenance activities identified in Attachment A of this permit shall be complied with as follows:

    A. The total emissions from all ILE planned maintenance activities shall be no more than the estimated potential to emit for those activities as represented in the MSS permit amendment application and subsequent associated submittals.

    B. The permit holder shall annually confirm the continued validity of the estimated potential to emit as represented in the MSS permit amendment application and subsequent associated submittals.

26. Emissions from planned MSS activities authorized by this permit shall be determined by the use of an appropriate method, including but not limited to any of following methods:

    A. Use of a continuous emissions monitoring system (CEMS). The CEMS shall be certified to measure the pollutant's emission over the entire range of a planned maintenance activity.

    B. Use of emission factors, including but not limited to, facility-specific parameters, manufacturer's emission factors, and/or engineering knowledge of the facility's operations.

    C. Use of emissions data measured (by a CEMS or during emissions testing) during the same type of planned MSS activity occurring at or on an identical or similar facility, and correlation of that data with the facility's relevant operating parameters, including but not limited to, temperature, fuel input, and fuel sulfur content.

    D. Use of emissions testing data collected during a planned maintenance activity occurring at or on the facility, and correlation of that data with the facility's relevant operating parameters, including but not limited to, temperature, fuel input, and fuel sulfur content.

    E. Additional occurrences of MSS activities authorized by this permit may be authorized under permit by rule only if conducted in compliance with this permit's procedures, emission controls, monitoring, and recordkeeping requirements applicable to the activity.

Ammonia Handling

Piping, Valves, Pumps, and Compressors in contact with ammonia - 28AVO

27. Except as may be provided for in the Special Conditions of this permit, the following requirements apply to the above-referenced equipment:

    A. Audio, olfactory, and visual checks for leaks within the operating area shall be made once per shift.

    B. Immediately, but no later than 1 hour upon detection of a leak, plant personnel shall take at least one of the following actions:

        (1) Isolate the leak.

        (2) Commence repair or replacement of the leaking component.

        (3) Use a leak collection/containment system to prevent the leak until repair or replacement can be made if immediate repair is not possible.

Date and time of each inspection shall be noted in the operator's log or equivalent. Records shall be maintained at the plant site of all repairs and replacements made due to leaks. These records shall be made available to representatives of the Texas Commission on Environmental Quality (TCEQ) upon request.

Initial Demonstration of Compliance

28. To demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Cement Kiln Baghouse Stack (EPN 21-SK-230). Air contaminants to be tested for include (but are not limited to) PM (filterable and condensable), PM_{10}, $PM_{2.5}$, CO, NO_X, SO_2,THC, H_2SO_4, HCl, NH_3, dioxins/furans, methane, Hg, and Pb. Testing shall be performed in accordance with the applicable initial compliance requirements of NSPS Subparts A and F and NESHAP Subpart LLL. Initial determination of compliance for VOC shall be performed in accordance with Special Condition No. 43. Sampling shall be accomplished within 60 days of achieving maximum production but not later than 180 days after startup. Sampling must be conducted in accordance with the TCEQ Guidelines for Stack Sampling Facilities and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling. The initial demonstration of compliance for NO_x, CO, and SO_2 hourly emissions for the Cement Kiln shall be based on all quality assured hourly average data collected by the CEMS for all operating hours during the first 30 kiln operating days following the initial CEMS certification. The initial demonstration of compliance for Hg shall be based on data collected from operating the sorbent trap monitoring system for the first 30 kiln operating days. The initial demonstration of compliance for H_2SO_4 shall be conducted when the in-line raw mill is not operating.

29. To demonstrate compliance with the MAERT and with emission performance levels as specified in the special conditions, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from the Finish Mill Baghouse Stack (EPN 51-SK-250). Air contaminants to be tested for include (but are not limited to) PM, PM_{10}, and $PM_{2.5}$. Sampling shall be accomplished within 60 days of achieving maximum production but not later than 180 days after startup. Sampling must be conducted in accordance with the TCEQ Guidelines for Stack Sampling Facilities and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling.

Sampling Requirements

30. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their own expense. Sampling ports and platforms shall be incorporated into the design of the stack(s) according to the specifications set forth in the attachment entitled “Guidelines for Stack Sampling Facilities” prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Office with jurisdiction.

31. A pretest meeting shall be held with personnel from the TCEQ before the required tests are performed. The TCEQ Regional Office with jurisdiction shall be notified not less than 45 days prior to sampling to schedule a pretest meeting. The notice shall include:

A. Date for pretest meeting;

B. Date sampling will occur;

C. Points or sources to be sampled;

D. Name of firm conducting sampling;

E. Type of sampling equipment to be used; and

F. Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.

32. Alternate sampling methods and representative unit testing may be proposed by the permit holder. A written proposed description of any deviation from sampling procedures or emission sources specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. Such a proposal must be approved by the TCEQ Regional Office with jurisdiction at least two weeks prior to sampling.

33. Requests to waive testing for any pollutant specified shall be submitted, in writing, for approval to the TCEQ Office of Air, Air Permits Division in Austin.

34. During stack sampling emission testing, the facilities shall operate at maximum represented production rates. Primary operating parameters that enable determination of production rates shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting.

35. If the plant is unable to operate at the maximum represented production rates during testing, then additional stack testing shall be required when the production rate exceeds the previous stack test production rate by +2 percent unless otherwise determined, in writing, by the TCEQ Executive Director. Additional testing, if required, shall be conducted within 180 days of achieving a production rate which exceeds the previous stack test production rate by +10 percent.

36. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office with jurisdiction. Additional time to comply with the applicable federal requirements requires EPA approval, and requests shall be submitted to the TCEQ Regional Office with jurisdiction.

37. Copies of the final sampling report shall be forwarded to the TCEQ within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows:

One copy to the TCEQ Regional Office with jurisdiction.

One copy to the TCEQ Office of Air, Air Permits Division in Austin.

One copy to each appropriate local air pollution control program with jurisdiction.

38. If, as a result of stack sampling, compliance with the permitted emission rates cannot be demonstrated, the holder of this permit shall adjust any operating parameters so as to comply with Special Condition No. 1 and the permitted emission rates.

39. If the holder of this permit is required to adjust any operating parameters for compliance, then beginning no later than 60 days after the date of the test conducted, the holder of this permit shall submit to the TCEQ, on a monthly basis, a record of adjusted operating parameters and daily records of production sufficient to demonstrate compliance with the permitted emission rates. Daily records of production and operating parameters shall be distributed as follows:

    One copy to the TCEQ Regional Office with jurisdiction.

    One copy to the TCEQ Office of Air, Air Permits Division in Austin.

Demonstration of Continuous Compliance and Compliance Assurance Monitoring

40. The holder of this permit shall install, calibrate, operate, and maintain on the Cement Kiln Baghouse Stack (EPN 21-SK-230) a PM continuous parametric monitoring system (CPMS) operated as specified in accordance with in 40 CFR Part 60, Subpart F. The CPMS is required to pass the initial certification requirements in 40 CFR Part 63, Subpart LLL. If the CPMS indicates an exceedance of the site-specific operating limit established per 40 CFR 63, Subpart LLL PM emission compliance, a visible emission observation shall be performed within 24 hours to establish compliance with the applicable opacity limits of Special Conditions No. 8. The visible emission determination must be made in accordance with 40 CFR Part 60, Appendix A, Test Method 22. The observation period when conducting Method 22 shall extend for at least one minute during normal operations. Contributions from uncombined water shall not be included in determining compliance with this condition. If visible emissions are observed, then the permit holder must conduct a six-minute test of opacity in accordance with 40 CFR Part 60 Appendix A, Test Method 9. The Method 9 test must begin within one hour of any observation of visible emissions.

41. The permit holder shall install, calibrate, and maintain a continuous emission monitoring system (CEMS) at the Cement Kiln for O_2, SO_2, CO, NO_x, and Total Hydrocarbon (as a surrogate for VOC as required by 40 CFR Part 63, Subpart LLL).

42. Each CEMS required under this permit shall satisfy the following requirements:

    A. The CEMS shall meet the design and performance specifications, pass the field tests, and meet the installation requirements and the data analysis and reporting requirements specified in the applicable Performance Specification Nos. 1 through 9, Title 40 Code of Federal Regulation Part 60 (40 CFR Part 60), Appendix B. If there are no applicable performance specifications in 40 CFR Part 60, Appendix B, contact the TCEQ Office of Air, Air Permits Division for requirements to be met.

    B. Subparagraph (1) below applies to sources subject to the quality-assurance requirements of 40 CFR Part 60, Appendix F; section 2 applies to all other sources:

        (1) The permit holder shall assure that the CEMS meets the applicable quality-assurance requirements specified in 40 CFR Part 60, Appendix F, Procedure 1. Relative accuracy exceedances, as specified in 40 CFR Part 60, Appendix F, Section 5.2.3 and any CEMS downtime shall be reported to the appropriate TCEQ Regional Manager, and necessary corrective action shall be taken. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Manager.

(2) The system shall be zeroed and spanned daily, and corrective action taken when the 24-hour span drift exceeds two times the amounts specified in the applicable Performance Specification Nos. 1 through 9, 40 CFR Part 60, Appendix B, or as specified by the TCEQ if not specified in Appendix B. Zero and span is not required on weekends and plant holidays if instrument technicians are not normally scheduled on those days.

Each monitor shall be quality-assured at least quarterly using Cylinder Gas Audits (CGA) in accordance with 40 CFR Part 60, Appendix F, Procedure 1, Section 5.1.2, with the following exception: a relative accuracy test audit (RATA) is not required once every four quarters (i.e., four successive quarterly CGA may be conducted). An equivalent quality-assurance method approved by the TCEQ may also be used. Successive quarterly audits shall occur no closer than two months.

All CGA exceedances of +15 percent accuracy indicate that the CEMS is out of control.

C. The monitoring data shall be reduced to hourly average concentrations at least once every day, using a minimum of four equally-spaced data points from each one-hour period. The individual average concentrations shall be reduced to units of the permit allowable emission rate in lb/hr at least once every week.

D. All monitoring data and quality-assurance data shall be maintained by the source. The data from the CEMS may, at the discretion of the TCEQ, be used to determine compliance with the conditions of this permit.

E. The appropriate TCEQ Regional Office shall be notified at least 30 days prior to any required RATA in order to provide them the opportunity to observe the testing.

F. Quality-assured (or valid) data must be generated when the source generating emissions is operating except during the performance of a daily zero and span check. Loss of valid data due to periods of monitor break down, out-of-control operation (producing inaccurate data), repair, maintenance, or calibration may be exempted provided it does not exceed 5 percent of the time (in minutes) that the source generating emissions operated over the previous rolling 12-month period. The measurements missed shall be estimated using engineering judgment and the methods used recorded. Options to increase system reliability to an acceptable value, including a redundant CEMS, may be required by the TCEQ Regional Manager.

43. The holder of this permit shall install, calibrate, operate, and maintain a CEMS to measure and record the in-stack concentrations of THC from the cement kiln in accordance with the requirements of 40 CFR Part 63, Subpart LLL. The holder of this permit shall install, calibrate, operate, and maintain a continuous flow rate sensor to measure and record the exhaust flow rate. The THC CEMS, which may be the same unit as described in Special Condition 42, is subject to the following:

A. The THC CEMS and the continuous flow rate sensor shall be used as a CERMS for VOC.

B. The CEMS monitoring data shall be reduced to hourly average concentrations in accordance with 40 CFR §60.13(h)(2(i)-(ix).

Each CEMS shall complete a minimum of one cycle of sampling, analyzing, and data recording for each successive 15-minute period.

Data recorded during periods of CEMS breakdowns, repairs, calibration checks, and zero and span adjustments shall not be included in the computed data averages.

C. Compliance with VOC emission limits in the MAERT shall be determined by applying the site specific VOC to methane fraction to THC CEMS data to calculate VOC lb/hr emissions from the kiln on a 30-day rolling average.

44. The Hg concentration in the Cement Kiln Baghouse Stack (EPN 21-SK-230) shall be measured continuously using a sorbent trap based CEMS or Mercury CEMS as required by and in accordance with the methods, frequencies, and quality assurance methods detailed in 40 CFR Part 63, Subpart LLL.

45. The NH_3 concentration in the Cement Kiln Baghouse Stack (EPN 21-SK-230) shall be tested or calculated according to one of the methods listed below and shall be tested or calculated according to frequency listed below. Testing for the NH_3 stack concentration is only required on days when the SCR or combination of SCR and SNCR unit is in operation.

A. The holder of this permit may install, calibrate, maintain, and operate a CEMS to measure and record the concentrations of NH_3. The NH_3 concentrations shall be corrected and reported in accordance with Special Condition No. 11 above.

B. The NH_3 stack concentration may be measured using a sorbent or stain tube device specific for NH_3 measurement in the appropriate range. The frequency of sorbent or stain tube testing shall be monthly.

(1) If the sorbent or stain tube testing indicates an ammonia (NH_3) stack concentration that exceeds 35 parts per million (ppm) at any time, the permit holder shall begin NH_3 testing by either the Phenol-Nitroprusside Method, the Indophenol Method, or EPA Conditional Test Method (CTM) 27 on a quarterly basis in addition to the monthly sorbent or stain tube testing.

(2) If the quarterly testing indicates NH_3 stack concentration is 35 ppm or less, the Phenol Nitroprusside Indophenol CTM 27 tests may be suspended until sorbent or stain tube testing again indicate 35 ppm NH_3 stack concentration or greater.

C. The permit holder may install and operate a second NO_x CEMS probe located between the kiln and the SCR or combination of SCR and SNCR, upstream of the stack NO_x CEMS, which may be used in association with the SCR or combination of SCR and SNCR efficiency and NH_3 injection rate to estimate NH_3 stack concentration. This condition shall not be construed to set a minimum NO_x reduction efficiency on the SCR or combination of SCR and SNCR unit. These results shall be recorded and used to determine compliance with Special Condition No. 11.

D. The permit holder may install and operate a dual stream system of NO_x CEMS at the exit of the SCR or combination of SCR and SNCR. One of the exhaust streams would be routed, in an unconverted state, to one NO_x CEMS, and the other exhaust stream would be routed through an NH_3 converter to convert NH_3 to NO_x and then to a second NO_x CEMS. The NH_3 stack concentration shall be calculated from the delta between the two NO_x CEMS readings (converted and unconverted). These results shall be recorded and used to determine compliance with Special Condition No. 11.

E. The permit holder may establish a correlation between the maximum NH_3 stack concentration limit and maximum NH_3 injection rate or other surrogate parameter that may be monitored to determine compliance with NH_3 stack concentrations. These results shall be recorded and used to determine compliance with Special Condition No. 11.

F. Other alternative methods used for measuring NH_3 stack concentration shall require prior written approval from the TCEQ Air Permits Division in Austin.

46. The capture and control system for each baghouse shall be operated and maintained in accordance with the manufacturer's recommendations to assure that the minimum control efficiency is met at all times when the controlled source is required to be operated. The following requirements shall apply to each baghouse.

A. The holder of this permit shall install, calibrate (if applicable), and maintain a differential pressure gauge to monitor pressure drop across the [baghouse, cartridge filter system, or filter pads]. The (each) monitoring device that requires calibration shall be calibrated at least annually in accordance with the manufacturer's specifications and shall be accurate to within a range of ± 0.5 inch water gauge pressure (± 125 pascals) or a span of ± 3 percent. The monitoring device that only requires to be zeroed shall be zeroed at least once a week.

B. The filter media differential pressure shall be maintained between [2 and 6] inches water column, or as defined by the manufacturer.

C. Pressure drop readings shall be recorded at least once per day that the system is required to be operated. Bags or filters shall be replaced whenever the pressure drop across the filter media no longer meets the limits in these Special Conditions or the manufacturer's recommendation.

D. If the filter system operating performance parameters are outside of the [2 and 6] inches water column or the manufacturer's recommended operating range, the affected facility shall not be operated until the abatement equipment is repaired; and

E. Planned maintenance on the dust collection system shall be performed only when the facilities being controlled by the dust collection system are not in operation.

F. The capture system's duct work shall be operated under negative pressure and an audio, visual, and olfactory (AVO) inspection of the capture system shall be performed monthly to check for leaking components. The capture system shall be maintained free of holes, cracks, and other conditions that would reduce the collection efficiency of the capture system; and

G. An inspection and maintenance log shall be kept for each baghouse dust collector whereby the log shall note the date of each inspection, the name of the inspector and any repairs and/or maintenance work performed.

47. The holder of this permit shall conduct a monthly visible emissions determination to demonstrate compliance with the opacity limitations specified in this permit for each of the baghouse (dust collector) stacks with the exception of the Finish Mill Baghouse Stack (EPN 51-SK-250), for which visible emissions determinations shall be conducted daily. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), and 5) at least two stack heights, but not more than five stack heights, from the emission point. If visible emissions are observed from the emission point, the owner or operator shall:

A. Take immediate action to eliminate visible emissions, record the corrective action within 24 hours, and comply with any applicable requirements in 30 Texas Administrative Code (TAC) § 101.201, Emissions Event Reporting and Recordkeeping Requirements; or

B. Determine opacity using 40 CFR Part 60, Appendix A, Test Method 9. If the opacity limit is exceeded, take immediate action (as appropriate) to reduce opacity to within the permitted limit, record the corrective action within 24 hours, and comply with applicable requirements in 30 TAC § 101.201, Emissions Event Reporting and Recordkeeping Requirements.

48. The holder of this permit shall conduct a monthly visible fugitive emissions determination to demonstrate compliance with the visible fugitive emissions limitation specified in this permit for the plant property. This visible fugitive emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), 5) at least 15 feet, but not more than 0.25 mile, from the plume, and 6) in accordance with EPA 40 CFR Part 60, Appendix A, Test Method 22, except where stated otherwise in this condition. If visible fugitive emissions leaving the property exceed 30 cumulative seconds in any six-minute period, the owner or operator shall take immediate action (as appropriate) to eliminate the excessive visible fugitive emissions. The corrective action shall be documented within 24 business hours of completion.

49. The TCEQ Regional Office shall be notified as soon as possible, but not later than 24 hours, after the discovery of any monitor malfunction that is expected to result in more than 24 hours of lost data. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Director in case of extended monitor downtime. Necessary corrective action shall be taken if the downtime exceeds 5 percent of the operating hours in the quarter. Failure to complete any corrective action as directed by the TCEQ Regional Office may be deemed a violation of the permit.

50. The control devices associated with EPNs 10-BF-035, 10-BF-140, 12-BF-140, 12-BF-315, 13-BF-500, 20-BF-010, 21-SK-230, 51-SK-250, 22-BF-160, 44-BF-030, 50-BF-350, 51-BF-050, 51-BF-140, 52-BF-110, and 53-BF-110 shall not have a bypass, with the exception of the alkali bypass for the kiln (EPN 21-SK-230).

Recordkeeping Requirements

51. Records shall be maintained at this facility site and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction to demonstrate compliance with permit limitations. These records shall be totaled for each calendar month, retained for a rolling 60-month period, and include the following:

A. Daily and monthly clinker production rates for the Cement Kiln (in tons);

B. After the CEMS certification (or sorbent trap validation for Hg), CEMS data as specified in Special Condition No. 42 C and a 30-day rolling average NO_x, CO, SO_2, NH_3, THC, and Hg emissions, as applicable, from the kiln shall be calculated on a lb/hr basis. A new 30-day rolling average shall be calculated at the end of each day;

C. After the CEMS certification, the holder of this permit shall maintain a raw data file of all CEMS measurements from the EPN 21-SK-230, including CEMS performance testing measurements, all CEMS calibration checks and adjustments and maintenance performed on these systems. This data shall be maintained in either hard copy or electronically so long as it is suitable for inspection;

D. Excess emissions and monitoring systems performance report for opacity consistent with the requirements of 40 CFR § 60.7(c) and (d);

E. Documentation of all CEMS or COMS quality-assurance measures, calibration checks, adjustments, and maintenance performed on these systems and documentation of alternative NH_3 continuous demonstration of compliance, if any;

F. Records of AVO checks for Piping, Valves, Pumps, and Compressors in contact with ammonia;

G. Records of pressure drop readings for each baghouse;

H. Malfunctions of any air pollution abatement systems;

I. Documentation of air pollution control equipment inspections, maintenance, and repair;

J. Records of visible emission/opacity observations and any corrective actions taken;

K. Hours of operation of the Emergency Generator (EPN EG-1);

L. Records of planned MSS activities, including the following, to demonstrate compliance with Special Condition Nos. 22-25 and the MAERT:

(1) Records of startup and shutdown of the kiln, including the date, time, duration, and emissions associated with those activities.

(2) Records of ILE planned maintenance activities and annual validations.

52. The following records shall be maintained at this facility site and made available at the request of personnel from the TCEQ or any other air pollution control program having jurisdiction. These records shall be retained for a rolling 60-month period:

A. All monitoring data and support information as specified in 30 TAC § 122.144; and

B. Inspections of capture systems and abatement devices shall be recorded as they occur.

Reporting Requirements

53. The holder of this permit shall submit a copy of semiannual CPMS reports to the TCEQ Regional Office with jurisdiction in a format specified by the TCEQ Regional Office. All reports shall be postmarked by the 30th day following the end of each semiannual period and shall include the following information for each monitor:

A. The date and duration of time from the commencement to the completion of an event which resulted in excess opacity.

B. The date and time of the commencement and completion of each specific time period of excess opacity within that event.

C. The total time duration of excess opacity.

D. The nature and cause of any malfunction resulting in excess opacity and the corrective action taken and/or preventative measures adopted.

E. The date and time identifying each period during which a CPMS was inoperative, except for zero span checks, and the nature of the system repairs and/or adjustments which occurred during the downtime.

F. When no excess opacities have occurred or the CPMS have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

G. The reporting of excess opacity required by this condition does not relieve the holder of this permit from notification requirements of upset conditions as required by 30 TAC §§ 101.201 and 101.211.

H. For the purposes of reporting pursuant to these Special Conditions, excess periods of opacity are defined as each six-minute period of operation during which the average opacity, as measured and recorded by the CPMS, exceed the limitations in Special Condition No. 8.

54. The holder of this permit shall submit a copy of semiannual CEMS reports to the TCEQ Regional Office with jurisdiction in a format specified by the TCEQ Regional Office. All reports shall be postmarked by the 30th day following the end of each semiannual period and shall include the following information for each monitor:

A. The date and duration of time from the commencement to the completion of an event which resulted in excess emissions of any pollutant.

B. The date and time of the commencement and completion of each specific time period of excess emissions within that event.

C. The total time duration of excess emissions.

D. The magnitude of the emissions, including the highest emission rate, and the average emission rate. All excess emissions shall be converted into the units of the permit. All conversion factors and equations shall be included.

E. The nature and cause of any malfunction resulting in excess emissions and the corrective action taken and/or preventative measures adopted.

F. The date and time identifying each period during which a CEMS was inoperative, except for zero span checks, and the nature of the system repairs and/or adjustments which occurred during the downtime.

G. When no excess emissions have occurred or the CEMS have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

H. In addition to the other information required in this Special Condition, a summary of the excess emissions shall be reported using the form identified as Figure 1 in 40 CFR § 60.7 or similar form determined to be acceptable by the TCEQ Regional Office.

I. The reporting of excess emissions required by this condition does not relieve the holder of this permit from notification requirements of upset conditions as required by 30 TAC § 101.201 or notification of maintenance as required by 30 TAC § 101.211.

Greenhouse Gases Special Conditions

55. Emissions from the Kiln exhaust shall not exceed the following limits:

Greenhouse Gases (GHG)	Limit/Emission Factor
CO_{2e}	0.92 ton/ton clinker 12 month rolling average

56. Initial determination of compliance as specified in Special Condition No. 27 shall also include sampling for CO_2.

Provided it is conducted within the time frames and conforms with the notification requirements of this Special Condition and Special Condition No. 27, the CO_2 CEMS may satisfy for the initial performance test, in accordance with 40 CFR §98.34(c)(1), conforming with the Performance Specification 3 in appendix B to Part 60 for CO_2 concentration monitors and Performance Specification 5 in appendix B to Part 60 for the continuous rate monitoring system.

57. The permittee shall install, calibrate, maintain, and operate a CO_2 CEMS or other appropriate monitoring methodology and/or equipment to measure and record the concentration from the Cement Kiln in accordance with the CO_2 CEMS system requirements in 40 CFR 98.83(a).

    A. The CEMS shall meet the design and performance specifications, pass the field tests, and meet the installation requirements and the data analysis and reporting requirements specified in the applicable Performance Specification Nos. 1 through 9, 40 CFR Part 60, Appendix B, or an acceptable alternative. If there are no applicable performance specifications in 40 CFR Part 60, Appendix B, contact the TCEQ Office of Air, Air Permits Division in Austin for requirements to be met.

    B. The holder of this permit shall assure that the CEMS meets the applicable quality-assurance requirements specified in 40 CFR Part 60, Appendix F, Procedure 1, or an acceptable alternative. Relative accuracy exceedances, as specified in 40 CFR Part 60, Appendix F, § 5.2.3, and any CEMS downtime and all cylinder gas audit exceedances of ±15 percent accuracy shall be reported semiannually to the appropriate TCEQ Regional Director, and necessary corrective action shall be taken. Supplemental stack concentration measurements may be required at the discretion of the appropriate TCEQ Regional Director.

    C. The monitoring data shall be reduced to hourly average values at least once every day, using a minimum of four equally-spaced data points from each one-hour period. At least two valid data points shall be generated during the hourly period in which zero and span is performed.

    D. All monitoring data and quality-assurance data shall be maintained by the source for a period of five years and shall be made available to the TCEQ Executive Director or a designated representative upon request. The hourly average data from the CEMS shall be used to determine compliance with the conditions of this permit. The Kiln CEMS data shall also be used to produce TPY each month and used to determine compliance with the annual tonnage emission limits of this permit.

    E. The appropriate TCEQ Regional Office shall be notified at least 30 days prior to any required RATAs in order to provide them the opportunity to observe the testing.

Greenhouse Gases Recordkeeping Requirements

58. Permit holders must keep records sufficient to demonstrate compliance with 30 TAC 116.164. Records shall be sufficient to demonstrate the amount of emissions of GHGs from the source as a result of construction; a physical change or a change in method of operation does not require authorization under 30 TAC 116.164(a). Records shall be maintained for a period of five years after collection.

59. The holder of this permit shall maintain the following records at the plant site in a form suitable for inspection for a period of five years after collection, and the records shall be made available upon request to representatives of the TCEQ, EPA, or any air pollution control agency with jurisdiction.

    A. Daily and monthly clinker production rates for the Cement Kiln (in tons);

B. For each continuous emissions monitor, records of the nature and cause of any malfunction (if known), the corrective action taken, or preventive measures adopted shall be kept; and

C. Total monthly CO_2 and CO_{2e} emissions are to be calculated and recorded monthly as follows:

(1) Sum total monthly CO_2 emissions from CEMS data.

(2) Calculate total nitrous oxide (N_2O) and methane (CH_4) monthly emissions using monthly production data, heat input, and worst-case emission factors from Table C-2 of 40 CFR Part 98, Subpart C.

(3) Convert CO_2, N_2O and CH_4 monthly emissions to CO_{2e} emissions using Equation A-1 of 40 CFR Part 98, Subpart A.

The monthly data from this Special Condition shall be used to calculate rolling 12-month total emission rates of CO_{2e} to demonstrate compliance with emissions limits in the MAERT.

Date:

Attachment A

Permit Numbers 167047, PSDTX1602, and GHGPSDTX212

Inherently Low Emitting (ILE) Maintenance Activities

Planned Maintenance Activity	Pollutant					
	VOC	NOx	CO	PM	SO2	CO2
Vacuum truck solids unloading				x		
CEMS calibration	x	x	x		x	x
Refractory maintenance operations				x		
Miscellaneous particulate filter maintenance				x		
Kiln particulate filter maintenance				x		
Equipment heating	x	x	x	x	x	x

Date:

Emission Sources - Maximum Allowable Emission Rates

Permit Numbers 167047 and PSDTX1602

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
21-SK-230	Cement Kiln Baghouse Stack	NO_x	75.34	289.00
		SO_2	83.33	213.31
		H_2SO_4	152.76	58.66
		HCl	2.38	10.41
		CO	1249.88	1599.84
		PM	41.66	159.98
		PM_{10}	41.66	159.98
		$PM_{2.5}$	41.66	159.98
		Pb	0.01	0.04
		Hg	<0.01	0.01
		VOC	25.24	100.49
		NH_3	12.95	56.72
51-SK-250	Finish Mill Baghouse Stack	NO_x	0.16	0.70
		SO_2	<0.01	0.04
		CO	1.31	5.74
		PM	3.23	14.13
		PM_{10}	3.23	14.13
		$PM_{2.5}$	3.23	14.13
		VOC	0.09	0.38
10-BF-035	Crusher Building Baghouse Stack	PM	0.68	2.98
		PM_{10}	0.68	2.98
		$PM_{2.5}$	0.68	2.98

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
10-BF-140	Material Transfer (LS to Storage) Baghouse Stack	PM	0.13	0.55
		PM_{10}	0.13	0.55
		$PM_{2.5}$	0.13	0.55
12-BF-140	Additive Unloading (Rail) Baghouse Stack	PM	0.13	0.55
		PM_{10}	0.13	0.55
		$PM_{2.5}$	0.13	0.55
11-BF-270	Material Transfer (LS to Hopper) Baghouse Stack	PM	0.10	0.44
		PM_{10}	0.10	0.44
		$PM_{2.5}$	0.10	0.44
11-BF-285	Material Transfer (LS to Hopper) Baghouse Stack	PM	0.10	0.44
		PM_{10}	0.10	0.44
		$PM_{2.5}$	0.10	0.44
12-BF-315	Truck Unloading Baghouse Stack	PM	0.38	1.66
		PM_{10}	0.38	1.66
		$PM_{2.5}$	0.38	1.66
12-BF-325	Material Transfer (Rail Add. to Storage) Baghouse Stack	PM	0.10	0.44
		PM_{10}	0.10	0.44
		$PM_{2.5}$	0.10	0.44
12-BF-360	Material Transfer (Truck Add. to Storage) Baghouse Stack	PM	0.06	0.28
		PM_{10}	0.06	0.28
		$PM_{2.5}$	0.06	0.28
13-BF-030	Raw Mill Feed (Top of Bin Baghouse) Stack	PM	0.06	0.28
		PM_{10}	0.06	0.28
		$PM_{2.5}$	0.06	0.28
13-BF-500	Raw Mill Feed Bin Building Baghouse Stack	PM	0.21	0.94
		PM_{10}	0.21	0.94
		$PM_{2.5}$	0.21	0.94

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
20-BF-010	Raw Mill Building Baghouse Stack	PM	0.15	0.66
		PM_{10}	0.15	0.66
		$PM_{2.5}$	0.15	0.66
20-BF-182	Raw Mill Building Baghouse Stack	PM	0.10	0.44
		PM_{10}	0.10	0.44
		$PM_{2.5}$	0.10	0.44
20-BF-360	Raw Mill Building Baghouse Stack	PM	0.06	0.25
		PM_{10}	0.06	0.25
		$PM_{2.5}$	0.06	0.25
21-BF-330	Top of CKD Bin Baghouse Stack	PM	0.04	0.17
		PM_{10}	0.04	0.17
		$PM_{2.5}$	0.04	0.17
22-BF-060	Bottom of Raw Meal Silo Baghouse Stack	PM	0.11	0.50
		PM_{10}	0.11	0.50
		$PM_{2.5}$	0.11	0.50
22-BF-080	Preheater Tower Baghouse Stack	PM	0.06	0.28
		PM_{10}	0.06	0.28
		$PM_{2.5}$	0.06	0.28
22-BF-160	Top of Raw Meal Silo Baghouse Stack	PM	0.19	0.83
		PM_{10}	0.19	0.83
		$PM_{2.5}$	0.19	0.83
22-BF-385	Top of Surge Bin (RM Silo) Baghouse Stack	PM	0.06	0.28
		PM_{10}	0.06	0.28
		$PM_{2.5}$	0.06	0.28
30-BF-260	Bottom of Preheater Tower Baghouse Stack	PM	0.10	0.44
		PM_{10}	0.10	0.44
		$PM_{2.5}$	0.10	0.44

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
30-BF-320	Top of Preheater Tower Baghouse Stack	PM	0.06	0.25
		PM_{10}	0.06	0.25
		$PM_{2.5}$	0.06	0.25
42-BF-270	Cooler Discharge Baghouse Stack	PM	0.08	0.36
		PM_{10}	0.08	0.36
		$PM_{2.5}$	0.08	0.36
41-BF-130	Top of Bin (Bypass Dust) Baghouse Stack	PM	0.03	0.11
		PM_{10}	0.03	0.11
		$PM_{2.5}$	0.03	0.11
44-BF-030	Top of Clinker Silo Baghouse Stack	PM	0.32	1.38
		PM_{10}	0.32	1.38
		$PM_{2.5}$	0.32	1.38
44-BF-185	Transfer Tower (Clinker Storage and Handling) Baghouse Stack	PM	0.08	0.33
		PM_{10}	0.08	0.33
		$PM_{2.5}$	0.08	0.33
50-BF-050	Top of Clinker Feed Bin Baghouse Stack	PM	0.05	0.22
		PM_{10}	0.05	0.22
		$PM_{2.5}$	0.05	0.22
50-BF-020	Top of Gypsum Feed Bin Baghouse Stack	PM	0.04	0.19
		PM_{10}	0.04	0.19
		$PM_{2.5}$	0.04	0.19
50-BF-350	Cement Feed Bin Extraction Baghouse Stack	PM	0.20	0.88
		PM_{10}	0.20	0.88
		$PM_{2.5}$	0.20	0.88
51-BF-050	Cement Mill Building Baghouse Stack	PM	0.15	0.66
		PM_{10}	0.15	0.66
		$PM_{2.5}$	0.15	0.66

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
51-BF-140	Cement Mill Building Baghouse Stack	PM	0.12	0.50
		PM_{10}	0.12	0.50
		$PM_{2.5}$	0.12	0.50
51-BF-350	Top of Cement Silo (Bucket Elevator Discharge) Baghouse Stack	PM	0.06	0.25
		PM_{10}	0.06	0.25
		$PM_{2.5}$	0.06	0.25
51-BF-380	Bottom of Cement Silo (Bucket Elevator Feed) Baghouse Stack	PM	0.07	0.30
		PM_{10}	0.07	0.30
		$PM_{2.5}$	0.07	0.30
52-BF-110	Top of Cement Silo 1 Baghouse Stack	PM	0.21	0.94
		PM_{10}	0.21	0.94
		$PM_{2.5}$	0.21	0.94
53-BF-110	Top of Cement Silo 2 Baghouse Stack	PM	0.20	0.88
		PM_{10}	0.20	0.88
		$PM_{2.5}$	0.20	0.88
52-BF-190	Top of Surge Bin (CM Silo-1) Baghouse Stack	PM	0.08	0.33
		PM_{10}	0.08	0.33
		$PM_{2.5}$	0.08	0.33
53-BF-190	Top of Surge Bin (CM Silo-2) Baghouse Stack	PM	0.08	0.33
		PM_{10}	0.08	0.33
		$PM_{2.5}$	0.08	0.33
52-BF-270	Loadout System (CM Silo-1) Baghouse Stack	PM	0.05	0.22
		PM_{10}	0.05	0.22
		$PM_{2.5}$	0.05	0.22
53-BF-270	Loadout System (CM Silo-2) Baghouse Stack	PM	0.05	0.22
		PM_{10}	0.05	0.22
		$PM_{2.5}$	0.05	0.22

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
LSCRSHBD_MH	Limestone - Material Handling LS Crusher Building (5)	PM	0.04	0.15
		PM_{10}	0.02	0.07
		$PM_{2.5}$	<0.01	0.01
TRK_MH	Additive - Material Handling Truck Unloading (5)	PM	0.01	0.04
		PM_{10}	<0.01	0.01
		$PM_{2.5}$	<0.01	<0.01
RR_MH	Additive - Material Handling Rail Unloading (5)	PM	0.01	0.04
		PM_{10}	<0.01	0.01
		$PM_{2.5}$	<0.01	<0.01
LS_STKPL	Limestone Stockpile 1 (5)	PM	0.08	0.33
		PM_{10}	0.04	0.17
		$PM_{2.5}$	0.01	0.03
LS_STKPL	Limestone Stockpile 2 (5)	PM	0.08	0.33
		PM_{10}	0.04	0.17
		$PM_{2.5}$	0.01	0.03
ADD_STKPL	Gypsum Stockpile (5)	PM	0.03	0.11
		PM_{10}	0.01	0.06
		$PM_{2.5}$	0.002	0.01
ADD_STKPL	High Grade Limestone Stockpile (5)	PM	0.05	0.20
		PM_{10}	0.02	0.10
		$PM_{2.5}$	<0.01	0.02
ADD_STKPL	Sand Stockpile (5)	PM	0.02	0.09
		PM_{10}	0.01	0.05
		$PM_{2.5}$	<0.01	0.01
EG-1	Emergency Generator Engine	NO_x	8.87	0.44
		SO_2	<0.01	<0.01
		CO	17.74	0.89

Emission Sources - Maximum Allowable Emission Rates

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
		PM	0.14	0.01
		PM_{10}	0.14	0.01
		$PM_{2.5}$	0.14	0.01
		VOC	4.58	0.23
NH3FUG	NH3 Fugitives (5)	NH_3	0.06	0.28
MSSFUG	ILE MSS Activities	NO_x	<0.01	<0.01
		SO_2	<0.01	<0.01
		CO	<0.01	<0.01
		PM	0.81	0.77
		PM_{10}	0.66	0.76
		$PM_{2.5}$	0.28	0.38
		VOC	<0.01	<0.01

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.
(2) Specific point source name. For fugitive sources, use area name or fugitive source name.
(3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
NO_x - total oxides of nitrogen
CO - carbon monoxide
SO_2 - sulfur dioxide
PM - total particulate matter, suspended in the atmosphere, including PM_{10} and $PM_{2.5}$, as represented
PM_{10} - total particulate matter equal to or less than 10 microns in diameter, including $PM_{2.5}$, as represented
$PM_{2.5}$ - particulate matter equal to or less than 2.5 microns in diameter
HCl - hydrogen chloride
H_2SO_4 - sulfuric acid
Pb - Lead
Hg - Mercury
NH_3 - ammonia
(4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period.
(5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.

Date: DRAFT

Emission Sources - Maximum Allowable Emission Rates

Permit Number GHGPSDTX212

This table lists the maximum allowable emission rates of greenhouse gas (GHG) emissions, as defined in Title 30 Texas Administrative Code § 101.1, for all sources of GHG air contaminants on the applicant's property that are authorized by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities authorized by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates	
			lbs/hour	TPY (4)
21-SK-230	Cement Kiln Baghouse Stack	CO_{2e}	-	981,402.53
51-SK-250	Finish Mill Baghouse Stack	CO_{2e}	-	8,210.12
EG-1	Emergency Generator Engine	CO_{2e}	-	42.25

(1) Emission point identification - either specific equipment designation or emission point number from plot plan.
(2) Specific point source name. For fugitive sources, use area name or fugitive source name.
(3) CO_2e - carbon dioxide equivalents based on the following Global Warming Potentials (GWP) found in Table A-1 of Subpart A 40 CFR Part 98 (78 FR 71904) for each pollutant: CO_2 (1), N_2O (298), CH_4(25)
(4) Compliance with annual emission limits (tons per year) is based on a 12-month rolling period. These rates include emissions from maintenance, startup, and shutdown.

Date: DRAFT

Construction Permit
Source Analysis & Technical Review

Company	**BM Dorchester LLC**	Permit Numbers	**167047, GHGPSDTX212, and PSDTX1602**
City	**Dorchester**	Project Number	**335160**
County	**Grayson**	Regulated Entity Number	**RN111368437**
Project Type	**Initial**	Customer Reference Number	**CN605952373**
Project Reviewer	**Joel Stanford**	Received Date	**November 8, 2021**
Site Name	**Portland Cement Plant**		

Project Overview

The Applicant has requested initial authorization of a cement kiln. Emissions from planned startup and shutdown activities will be authorized by this permit. Startup and shutdown emissions are virtually indistinguishable from productions emissions. Although there may be minor emissions associated with startup and shutdown, emission factors used to quantify production emissions are considered to have enough conservatism to include any incidental increases that may be attributed to startup and shutdown (see the kiln BACT discussion for more on this for that source).

Emission Summary

Air Contaminant	Proposed Allowable Emission Rates (tpy)
PM	196.94
PM_{10}	196.28
$PM_{2.5}$	195.39
VOC	101.11
NO_X	290.15
CO	1606.48
SO_2	213.37
Pb	0.04
NH_3	57.00
H_2SO_4	58.66
HCl	10.41
CO2e	989,654.90

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	December 2, 2021
Site rating & classification:	N/A (New facility)
Company rating & classification:	N/A (New company)
Has the permit changed on the basis of the compliance history or rating?	No
Did the Regional Office have any comments? If so, explain.	None related to compliance.

Public Notice Information

Requirement	**Date**
Legislator letters mailed	11/16/2021
Date 1st notice published	12/19/2021
Publication Name: **Herald Democrat**	
Pollutants: **CO, HAP, SO_2, NO_X, VOC, PM, PM_{10}, $PM_{2.5}$, Pb, SO_2, GHG**	
Date 1st notice Alternate Language published	
Publication Name (Alternate Language):	
1st public notice tearsheet(s) received	01/27/2022
1st public notice affidavit(s) received	01/27/2022
1st public notice certification of sign posting/application availability received	1/23/2024
SB709 Notification mailed	11/18/2021 and 1/22/2024
Date 2nd notice published	
Publication Name:	
Pollutants:	
Date 2nd notice published (Alternate Language)	
Publication Name (Alternate Language):	
2nd public notice tearsheet(s) received	
2nd public notice affidavit(s) received	
2nd public notice certification of sign posting/application availability received	

Public Interest

Number of comments received	2749
Number of meeting requests received	98
Number of hearing requests received	24
Date meeting held	03/25/24
Date response to comments filed with OCC	03/18/25
Date of SOAH hearing	

Federal Rules Applicability

Requirement	
Subject to NSPS?	**Yes**
Subparts **A** & **F, OOO, JJJJ**	
Subject to NESHAP?	**No, the site does not emit any air contaminants regulated under 40 CFR Part 61.**
Subject to NESHAP (MACT) for source categories?	**Yes**
Subparts **A** & **LLL, ZZZZ**	
Nonattainment review applicability:	**No, Grayson County is not currently classified as nonattainment.**
PSD review applicability:	**Cement kilns are a PSD named source. Therefore, the PSD review threshold is 100 tpy for criteria pollutants. Once this threshold has been exceeded, each criteria pollutant and GHGs are compared against the PSD Significant Emission Rate (SER) to determine if the project triggers PSD review for these pollutants. The emissions of PM, PM_{10}, $PM_{2.5}$, CO, NO_X, SO_2, VOC, CO_2e (GHGs), and H_2SO_4 are greater than their corresponding SERs.**

Title V Applicability - 30 TAC Chapter 122 Rules

Requirement
Title V applicability: The facilities will be subject to Title V, and a Title V operating permit will be required.

Requirement

Periodic Monitoring (PM) applicability:
PM is applicable. The following monitoring requirements apply:

All baghouses/dust collectors: Each is subject to daily pressure drop readings. All baghouse capture systems will be subject to monthly inspections to ensure that they are free of holes, cracks, or other conditions which could reduce their capture efficiency. Monthly opacity/VE checks are required for all baghouses. The Finish Mill Baghouse Stack (EPN 51-SK-250) will be required to have a daily visible emissions/opacity observation.

Kiln: A CPMS is required for monitoring of PM. CEMS are required for O_2, SO_2, CO, NO_x, THC (as a surrogate for VOC), NH_3, Hg.

Kiln Dry Scrubbing System: Monitoring for this system will be required to be established with an as-built prior to start of operations.

Ammonia fugitives: AVO checks are required once every 24 hours (28AVO).

Compliance Assurance Monitoring (CAM) applicability:
CAM for PM is applicable to EPNs 10-BF-035, 10-BF-140, 12-BF-140, 12-BF-315, 13-BF-500, 20-BF-010, 21-SK-230, 51-SK-250, 22-BF-160, 44-BF-030, 50-BF-350, 51-BF-050, 51-BF-140, 52-BF-110, 53-BF-110, and EPN 21-SK-230. All of these units are baghouses (dust collectors) and each is subject to daily pressure drop readings. All baghouse capture systems will be subject to monthly inspections to ensure that they are free of holes, cracks, or other conditions which could reduce their capture efficiency. Monthly opacity/VE checks are required for all baghouses. The Finish Mill Baghouse Stack (EPN 51-SK-250) will be required to have a daily visible emissions/opacity observation.

As specified in 30 TAC 122.604(c)(6), the CEMS on the cement kiln (EPN 21-SK-230) exempt this unit from CAM on NOx, as they ensure continuous compliance assurance.

Process Description

A majority of the limestone used in the Portland cement production process is drawn from an on-site quarry. The limestone is crushed and blended on-site, then fed into the kiln system to be calcined. Portland cement clinker then exits the kiln and is cooled. The clinker is then mixed with other materials, such as gypsum, and milled into a fine powder (cement) before being shipped offsite by truck or rail.

For more detailed process description, please refer to the application materials.

Project Scope

The Applicant has requested initial authorization of a cement kiln. The proposed Dorchester Plant will be located in Dorchester, Grayson County, Texas. The plant covers approximately 660 acres along Farm to Market (FM) 902 and Dorchester Road. Limestone will be mined from an on-site quarry.

Best Available Control Technology

The proposed control technology is consistent with PSD BACT for PSD pollutants and state minor BACT for non-PSD pollutants. A control technology review was conducted for all pollutants. The controls described in this section were determined to satisfy BACT requirements based on a review of recently issued permits from Texas and other states, and consideration of the RACT/BACT/LAER Clearinghouse (RBLC) data provided by the applicant. MSS emissions are not expected to exceed normal operation given the nature of most of the sources at this facility (baghouse controlled or fugitive emissions). The section on the kiln below contains information relating to startup scenarios provided by the

Applicant which describe why startup emissions for the kiln are not expected to exceed normal operational scenarios.

Source Name	EPN	Best Available Control Technology Description
Kiln System	21-SK-230	**PM, PM_{10}, $PM_{2.5}$:** Add on control: Baghouse at 0.002 grains per dry standard cubic foot (gr/dscf). 5% opacity. PM, PM10, PM2.5 (filterable): 0.02 lbs. PM per ton of clinker on a 1-hour average and a rolling 12-month average PM, PM10, PM2.5 (condensable): 0.28 lbs. PM per ton of clinker on a 1-hour average, 30-day rolling average, and a rolling 12-month average. **CO:** No add on controls. BACT determination based on other kilns. 9.0 lbs of CO/ton of clinker on a 1-hour average and 30-day rolling average. 3.0 lbs. of CO/ton of clinker on a rolling 12-month average. **NO_x:** Add on and other control: Selective Catalytic Reduction (SCR) system or combination of SCR and Selective Non-Catalytic Reduction (SNCR) system, staged combustion, low NOx burners, good combustion practices. Notably the proposed NO_x rate exceeds RBLC PSD and state BACT, which is typically 1.5 lb/ton of clinker compared to the 0.54 lb/ton of clinker proposed. 0.54 lbs. of NO_x per ton of clinker on a 1-hour rolling average, 30-day rolling average, and 12 month rolling average. **SO_2:** Add on and other control: Scrubber with a represented control efficiency of 90%, the alkali absorption inherent in the pre-calciner kiln, and the use of low sulfur content natural gas as fuel. 0.60 lbs. SO2 per ton of clinker on a 1-hour rolling average, 0.40 lb per ton of clinker on a 30-day and 12 month rolling average. **VOC:** No add on controls. Good combustion practices. 24 ppmv at 7% O2 for THC on a 1-hour average, 30-day rolling average, and 12 month rolling average. Note that VOC levels are related to composition and concentration of organic materials in the quarry and BACT determinations are driven by this. **O-HAP** No add on controls. 12 ppmvd total organic HAP on a 30-day rolling average and 12

Source Name	EPN	Best Available Control Technology Description
		month rolling average. Note that this rate is based on preliminary organic information from the quarry. **Dioxins and Furans** No add on controls. 0.20 nanograms per dry standard cubic meter (TEQ), corrected to 7 % O2 on a 30-day rolling average and 12 month rolling average. **H_2SO_4:** Add on and other control: scrubber. The control efficiency of the scrubber will be specified in an as-built modification. 1.10 lbs. per ton of clinker on an hourly basis when the in-line raw mill and scrubber are not operating. 0.11 lbs. per ton of clinker on a 12-month rolling average basis. **HCl:** No add on controls. 3 ppmvd corrected to 7% O_2 on a 30-day rolling average and 12 month rolling average. **Hg** No add on controls. 0.000021 lb/ton of clinker on a 30-day rolling average and 12 month rolling average. **Pb** 7.50E-05 lb/ton of clinker on a 30-day rolling average and 12 month rolling average. **GHG:** No add on controls. Proper design and operation. 0.92 lbs. per ton of clinker on a 30 day rolling average. **NH_3 (SCR):** No add on controls. Operation in a manner to minimize ammonia slip. 35 ppmv at 7% O_2 on a 30-day rolling average. **MSS:** The Applicant has represented the following in relation to kiln startup and shutdown: The SCR will be operating at all times when fuel is being fired in the kiln/pre-heater except during kiln heat-ups at the beginning of startup. During these times, no raw materials will be fed into the kiln. During a cold startup after major refractory work, it will take about 36 hours to heat up the kiln. This operation is expected to only occur once per year. During the kiln heat-up process, NO_x emissions are estimated to range from 3 to 12 lb/hr based the AP-42 Table 1.4-1 NO_x emission factor for a large (>100 MMBtu/hr) boiler equipped with a low NO_x burner*.

Source Name	EPN	Best Available Control Technology Description
		This NO_x emission rate range is well below the proposed MAERT NO_x limit for normal kiln operations of 75.34 lb/hr, which is less than the kiln emission rate of 143.7 lb/hr evaluated in the Air Quality Analysis (AQA) submitted along with the initial application materials. During these kiln heat-up periods, supplemental air will be added to ensure that any combustion emissions are being exhausted. Although stack flow and temperature during these kiln heat-up periods have not been quantified, any reduction in dispersion due to stack flow and/or temperature is not expected to offset the ~13X lower NO_x emissions expected during planned kiln MSS periods shown in the example below. In addition, the total planned kiln MSS operating hours per year are expected to be not more than 72 hr/yr, which would qualify as an intermittent source under TCEQ and US EPA modeling guidance. The expected planned MSS hours are listed below: Case 1 - Kiln heat-up from cold after major refractory work - estimated to occur once per year at main maintenance stoppage (36 hrs per event) Case 2 - Kiln heat-up from cold after maintenance work w/o refractory work - estimated to occur once per year at secondary maintenance stoppage (12 hrs per event) Case 3 - Kiln heat-up from short stoppage for secondary maintenance work not requiring a full cool-down - estimated to occur about four times per year (6 hrs per event) Example Calculation - Maximum heat input during any warm-up case is not expected to exceed 81 MMBtu/hr. Therefore, the maximum NO_x emissions during warm-up periods are estimated as follows: 81 MMBtu/hr * 140 lb $NO_x/10^6$ scf / 1020 Btu/scf = 11.15 lb/hr NO_x * It should be noted that the factor used for the qualitative comparison above is conservative in that it reflects a low NO_x burner for a large (>100 MMBtu/hr) combustion unit; however, given that the kiln burner is a low NO_x burner rated at less than 100 MMBtu/hr (peak heat input during a start-up is expected to be approximately 81 MMBtu/hr), the NO_x emissions from the kiln burner during start-up could be as much as 36X lower than the emissions modeled in the AQA.
Finish Mill and Air Heater	51-SK-250	15.9 MMBtu/hr heater: **NO_x**: 0.01 lb/MMBtu based on the higher heating value of the fuel and the use of a low NOx burner. **PM, PM_{10}, $PM_{2.5}$:** Add on control: Baghouse at 0.005 gr/dscf. 5% opacity.

Source Name	EPN	Best Available Control Technology Description
Crusher, Milling, Raw Material Handling, and Product Handling	BF-Series EPNs (Numerous)	**PM, PM_{10}, $PM_{2.5}$:** Add on control: Baghouse at 0.0025 gr/dscf. 5% opacity.
Limestone, Gypsum, High Grade Limestone, and Sand Stockpiles	LS STKPL, ADD STKPL	**PM, PM_{10}, $PM_{2.5}$:** 90% reduction. Stockpiles will be required to be stored within a fully enclosed building.
Ammonia handling	NH3FUG	**NH_3:** AVO checks once per shift (28AVO). A control efficiency of 93-97% - dependent on the piping component type.
Emergency Generator Engine	EG-1	**Products of combustion**: Limited to pipeline quality natural gas. Subject to 40 CFR Part 60 JJJJ and Part 63 ZZZZ. Operation is limited to 100 hours per year. A non-resettable hour meter is required in the Special Conditions.
Raw Material Loading	RR_MH, TRK_MH	**PM, PM_{10}, $PM_{2.5}$:** 85% reduction. Partial enclosure defined as consisting of two sided (rail loading) or three-sided walls (truck loading) with fogging nozzles. Dustless telescopic spouts are required be used for loading trucks or rail from bins or silos. 85% is conservative given the additional controls and aspiration on this system.
Raw Material Handling (Crusher Building)	LSCRSHBD_MH	**PM, PM_{10}, $PM_{2.5}$:** 85% reduction. The actual crusher is controlled by a baghouse, this EPN is the dump into the crushing system. Partial enclosure is defined as three-sided walls with fogging nozzles. The operation is represented as taking place within the crusher's building, and the crusher loading hopper will be located below-grade to accommodate trucks dumping mined limestone. Therefore, 85% is expected to be a conservative control efficiency.
Silo Loading	N/A	Dustless telescoping spouts are required for these. This removes the units as potential fugitive dust sources, and emissions would be associated with the baghouses/dust collectors which control these units.
ILE MSS Activities	MSS FUG	**Refractory Removal:** **PM, PM_{10}, $PM_{2.5}$:** Refractory (a bricklike material) is removed as needed for repairs or replacement. Operations taking place inside the kiln or cooler will be enclosed by nature, resulting in a 90% reduction in emissions. Drop into trucks was accounted for with no controls. **Vacuum Truck Loading and Unloading:** **PM, PM_{10}, $PM_{2.5}$:** Partial enclosure will be utilized for an 85% reduction on loadouts. The trucks have a filter with an outlet grain loading of 0.01 gr/dscf for loading operations. **CEMS Calibration** **NO_x, CO, THC, SO_2** Emissions are due to the release of calibration gas from the feed analyzers and CEMS unit. No add on controls.

Source Name	EPN	Best Available Control Technology Description
Housekeeping	(non-facilities – nuisance dust prevention)	Plant roads are required to be paved and cleaned, as necessary, to control the emission of dust to the minimum level possible under existing conditions. Haul roads are required to be sprinkled with water and/or chemicals, as necessary, to maintain compliance with all applicable TCEQ rules and regulations. Blasting is forbidden from being utilized on site to acquire raw materials for cement production. A street sweeper and other mobile equipment is required to pick up debris from the plant roads. The street sweeper will be a full-sized truck which can be driven to the mined-out quarry to dispose of the debris collected.

Impacts Evaluation

Was modeling conducted? **Yes** Type of Modeling: **AERMOD – Refined**

Is the site within 3,000 feet of any school? **No**

Additional site/land use information: The surrounding land is primarily a mixture of strips of agricultural undeveloped land and residences – primarily to the west and south of the property line – with some directly bordering and nearby the property line. A church and some residences are located very close to the southern property line, the town of Dorchester is near the southern property line, and an aerodrome is located on the eastern property line. All facilities in the NSR permit will be located to the southern part of the property, with a quarry located on the northern part of the property. Many of the facilities will be located about 0.3 - 0.5 miles from the church and residence directly to the south. The region indicated a high nuisance potential given the location and nature of the proposed operations.

Air dispersion modeling was performed by the applicant to evaluate total air emissions from the proposed project. Based on the results of the dispersion model, emissions from the site are not expected to result in a violation of any state or national ambient air quality standard.

Emission species with ESL- based reviews were all under their relevant ESLs with the exception of Portland cement – which had a 1 hour exceedance of 53 µg/m^3 compared to a 1-hour ESL of 50 µg/m^3. This concentration was based on emission rates prior to the proposal of more efficient baghouses downstream of the kiln, which effectively halved emissions for a large number of sources, and it is expected that there would not have been an exceedance of the ESL with the new control efficiencies. However, an exceedance of an ESL solely merits further review by TCEQ Toxicology Division, and these emissions at the originally proposed rates were reviewed by the Toxicology Division. The Toxicology Division does not anticipate any short- or long-term adverse health effects to occur among the general public as a result of exposure to the proposed emissions from this facility. Emissions of non-criterial air contaminants are therefore not expected to create adverse impacts to public health.

The air dispersion modeling demonstration was audited by the TCEQ Air Dispersion Modeling Team and approved (memos dated January 31, 2024 and June 4, 2024).

Project Reviewer	Date	Section Manager	Date
Joel Stanford		Bonnie Evridge	

TCEQ Interoffice Memorandum

To: Joel Stanford
Mechanical/Coatings Section

Thru: Chad Dumas, Team Leader
Air Dispersion Modeling Team (ADMT)

From: Rachel Melton and Daniel Jamieson
ADMT

Date: July 17, 2023

Subject: Air Quality Analysis Audit – BM Dorchester LLC (RN111368437)

1. Project Identification Information

Permit Application Number: 167047
NSR Project Number: 335160
ADMT Project Number: 8631
County: Grayson
Published Map: \\tceq4avmgisdata\GISWRK\APD\MODEL PROJECTS\8631\8631.pdf

Air Quality Analysis: Submitted by Trinity Consultants, June 2023, on behalf of BM Dorchester LLC. Additional information was provided July 2023.

2. Report Summary

The air quality analysis (AQA) is acceptable for all review types and pollutants. The results are summarized below.

A. De Minimis Analysis

A De Minimis analysis was initially conducted to determine if a full impacts analysis would be required. The De Minimis analysis modeling results indicate that 1-hr SO_2, 24-hr and annual PM_{10}, 24-hr and annual $PM_{2.5}$ (NAAQS), 24-hr and annual $PM_{2.5}$ (Increment), and 1-hr NO_2 exceed the respective de minimis concentrations and require a full impacts analysis. The De Minimis analysis modeling results for 3-hr, 24-hr and annual SO_2, annual NO_2, and 1-hr and 8-hr CO indicate that the project is below the respective de minimis concentrations and no further analysis is required.

The justification for selecting the EPA's interim 1-hr NO_2 and 1-hr SO_2 De Minimis levels is based on the assumptions underlying EPA's development of the 1-hr NO_2 and 1-hr SO_2 De Minimis levels. As explained in EPA guidance memoranda[1,2], the EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO_2 and 1-hr SO_2 NAAQS.

The $PM_{2.5}$ and ozone De Minimis levels are the EPA recommended De Minimis levels. The use of the EPA recommended De Minimis levels is sufficient to conclude that a proposed source will not cause or contribute to a violation of an ozone and $PM_{2.5}$ NAAQS or $PM_{2.5}$ PSD increments based on the analyses documented in EPA guidance and policy memoranda[3].

[1] www.epa.gov/sites/production/files/2015-07/documents/appwso2.pdf
[2] www.tceq.texas.gov/assets/public/permitting/air/memos/guidance_1hr_no2naaqs.pdf
[3] www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html

While the De Minimis levels for both the NAAQS and increment are identical for $PM_{2.5}$ in the table below, the procedures to determine significance (that is, predicted concentrations to compare to the De Minimis levels) are different. This difference occurs because the NAAQS for $PM_{2.5}$ are statistically-based, but the corresponding increments are exceedance-based.

Table 1. Modeling Results for PSD De Minimis Analysis in Micrograms Per Cubic Meter (µg/m^3)

Pollutant	Averaging Time	GLCmax (µg/m^3)	De Minimis (µg/m^3)
SO_2	1-hr	12	7.8
SO_2	3-hr	12	25
SO_2	24-hr	4.5	5
SO_2	Annual	0.3	1
PM_{10}	24-hr	10	5
PM_{10}	Annual	3	1
$PM_{2.5}$ (NAAQS)	24-hr	7.2	1.2
$PM_{2.5}$ (NAAQS)	Annual	2.5	0.2
$PM_{2.5}$ (Increment)	24-hr	8.7	1.2
$PM_{2.5}$ (Increment)	Annual	2.7	0.2
NO_2	1-hr	19	7.5
NO_2	Annual	0.4	1
CO	1-hr	769	2000
CO	8-hr	276	500

The GLCmax for 1-hr SO_2, 1-hr NO_2 and 24-hr and annual $PM_{2.5}$ (NAAQS) are based on the highest five-year averages of the maximum predicted concentrations determined for each receptor. The GLCmax for all other pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

Intermittent guidance was relied on for the 1-hr SO_2 and 1-hr NO_2 PSD De Minimis analyses.

To evaluate secondary $PM_{2.5}$ impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with the EPA's Guideline on Air Quality Models (GAQM). Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and

peak secondary pollutants impacts from a source. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary $PM_{2.5}$ concentrations of 0.18949 µg/m^3 and 0.00231 µg/m^3, respectively. Since the combined direct and secondary 24-hr and annual $PM_{2.5}$ impacts are above the De minimis levels, a full impacts analysis is required.

Table 2. Modeling Results for Ozone PSD De Minimis Analysis in Parts per Billion (ppb)

Pollutant	Averaging Time	GLCmax (ppb)	De Minimis (ppb)
O_3	8-hr	0.99	1

The applicant performed an O_3 analysis as part of the PSD AQA. The applicant evaluated project emissions of O_3 precursor emissions (NO_x and VOC) based on a Tier 1 demonstration approach consistent with the EPA's GAQM referred to as MERPs. Using data associated with the 500 tpy and 1000 tpy Parker County source, the applicant estimated an 8-hr O_3 concentration of 0.98706 ppb. When the estimates of ozone concentrations from the project emissions are added together, the results are less than the De Minimis level.

B. Air Quality Monitoring

The De Minimis analysis modeling results indicate that 24-hr PM_{10} exceeds the respective monitoring significance level and requires the gathering of ambient monitoring information.

The De Minimis analysis modeling results indicate that 24-hr SO_2, annual NO_2, and 8-hr CO are below their respective monitoring significance level.

Table 3. Modeling Results for PSD Monitoring Significance Levels

Pollutant	Averaging Time	GLCmax (µg/m^3)	Significance (µg/m^3)
SO_2	24-hr	4.5	13
PM_{10}	24-hr	10.1	10
NO_2	Annual	0.4	14
CO	8-hr	276	575

The GLCmax for all pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

The applicant evaluated ambient PM_{10} and $PM_{2.5}$ monitoring data to satisfy the requirements for the pre-application air quality analysis.

A background concentration for PM_{10} was obtained from the EPA AIRS monitor 481130050 located at 717 South Akard St. Dallas, Dallas County. The high, second high monitored concentration from 2020-2022 was used for the 24-hr value (82 µg/m^3). The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the

monitor site relative to the project site. The background concentration was also used in the NAAQS analysis.

Background concentrations for $PM_{2.5}$ were obtained from the EPA AIRS monitor 481210034 located at Denton Airport South, Denton, Denton County. The applicant calculated the three-year average (2020-2022) of the 98th percentile of the annual distribution of the 24-hr concentrations for the 24-hr value (20 µg/m^3). The applicant used a three-year average (2020-2022) of the annual concentrations for the annual value (7.5 µg/m^3). The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site. The background concentrations were also used in the NAAQS analysis.

Since the project has a net emissions increase of 100 tons per year (tpy) or more of volatile organic compounds or nitrogen oxides, the applicant evaluated ambient O_3 monitoring data to satisfy requirements in 40 CFR 52.21 (i)(5)(i)(f).

The applicant identified the Pilot Point ozone monitor (EPA AQS 481211032) as a conservative monitor for the proposed project site location. The applicant further noted how the Pilot Point monitor is located within the Dallas-Fort Worth (DFW) ozone non-attainment area and summarized the 2020-2022 ozone design value for the monitor without further refinement. The ADMT has reviewed the ozone monitoring data for further refinement and this review is discussed below.

Initially, during the modeling protocol development, the applicant had proposed using the Greenville ozone monitor (EPA AQS 482311006) for the proposed project site location. The ADMT had commented that the proposed project site location is likely to be located downwind of the DFW ozone non-attainment area more often than the selected Greenville monitor, based on wind data, and it is likely that the Greenville monitor would not be representative of the proposed project site location for all wind directions and should not be exclusively used in the pre-application analysis.

The ADMT reviewed monitoring data from two additional ozone monitors to identify ozone concentrations during times when the proposed project site location could have been located downwind of the DFW ozone non-attainment area – the above-mentioned Pilot Point monitor and the Frisco monitor (EPA AQS 480850005). Collectively, the information from these two monitors, along with the Greenville monitor, gives a complete analysis for the proposed project site location.

The Pilot Point ozone monitor is located to the southwest of the proposed project site location. A sector was defined with an origin at the Pilot Point monitor and that covered the extent of the modeled receptor grid surrounding the proposed project site location. The sector was then used to identify wind directions favorable for transport towards the proposed project site location (220–265 degrees). Ozone data were reviewed during these wind directions for years 2020-2022 and the highest fourth highest daily maximum hourly value from all three years was 64 ppb. This would be a conservative metric for the ozone design value; the ozone design value is based on a three-year average of the fourth highest daily maximum rolling 8-hr average.

The Frisco ozone monitor is located to the south-southwest of the proposed project site location. Similar to the Pilot Point ozone monitor described above, a sector was defined with an origin at the Frisco monitor and that covered the extent of the modeled receptor grid surrounding the proposed project site location. The sector was then used to identify wind directions favorable for transport towards the proposed project site location (178–215 degrees). Ozone data were reviewed during these wind directions for years 2020-2022 and the highest fourth highest daily maximum rolling 8-hr average value from all three years

was 69 ppb. This would be a conservative metric for the ozone design value; the ozone design value is based on a three-year average of the fourth highest daily maximum rolling 8-hr average.

The Greenville ozone monitor has an ozone design value of 63 ppb for the years 2020-2022.

C. National Ambient Air Quality Standard (NAAQS) Analysis

The De Minimis analysis modeling results indicate 1-hr SO_2, 24-hr and annual PM_{10}, 24-hr and annual $PM_{2.5}$ and 1-hr NO_2 exceed the respective de minimis concentration and require a full impacts analysis. The full NAAQS modeling results indicate the total predicted concentrations will not result in an exceedance of the NAAQS.

Table 4. Total Concentrations for PSD NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax ($\mu g/m^3$)	Background ($\mu g/m^3$)	Total Conc. = [Background + GLCmax] ($\mu g/m^3$)	Standard ($\mu g/m^3$)
SO_2	1-hr	11	16	27	196
PM_{10}	24-hr	10	82	92	150
$PM_{2.5}$	24-hr	6	20	26	35
$PM_{2.5}$	Annual	2.6	7.5	10.1	12
NO_2	1-hr	87	see discussion below	87	188

The 1-hr SO_2 GLCmax is the highest five-year average of the 99th percentile of the annual distribution of predicted daily maximum 1-hr concentrations determined for each receptor.

The 24-hr PM_{10} GLCmax is the maximum predicted concentration over five years of meteorological data.

The 24-hr $PM_{2.5}$ GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted 24-hr concentrations determined for each receptor.

The annual $PM_{2.5}$ GLCmax is the maximum five-year average of the annual concentrations determined for each receptor.

The 1-hr NO_2 GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted daily maximum 1-hr concentrations determined for each receptor.

A background concentration for SO_2 was obtained from the EPA AIRS monitor 481390016 located at 2725 Old Fort Worth Rd., Midlothian, Ellis County. A three-year average (2019-2021) of the 99th percentile of the annual distribution of daily maximum 1-hr concentrations was used for the 1-hr value. The applicant reviewed more recent monitoring data from EPA AIRS monitor 482570005 and determined the outcome of the analysis would not change. The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site.

A background concentration for NO_2 was obtained from the EPA AIRS monitor 481210034 located at Denton Airport South, Denton, Denton County. The applicant determined the 98th percentile of the annual distribution of the maximum 1-hr concentrations for each hour of the day (using data from 2020-2022), consistent with EPA guidance. These background values were then used in the model (as hourly background scalars) with the BACKGRND keyword to be combined with model predictions, giving a total predicted concentration. The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site.

As stated above, to evaluate secondary $PM_{2.5}$ impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with the EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as MERPs. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary $PM_{2.5}$ concentrations of 0.18949 µg/m^3 and 0.00231 µg/m^3, respectively. When these estimates are added to the GLCmax listed in Table 4 above, the results are less than the NAAQS.

D. Increment Analysis

The De Minimis analysis modeling results indicate that 24-hr and annual PM_{10} and 24-hr and annual $PM_{2.5}$ exceed the respective de minimis concentrations and require a PSD increment analysis.

Table 5. Results for PSD Increment Analysis

Pollutant	Averaging Time	GLCmax (µg/m^3)	Increment (µg/m^3)
PM_{10}	24-hr	29	30
PM_{10}	Annual	3	17
$PM_{2.5}$	24-hr	8.7	9
$PM_{2.5}$	Annual	2.7	4

The GLCmax for 24-hr $PM_{2.5}$ and 24-hr PM_{10} is the maximum high, second high (H2H) predicted concentration across five years of meteorological data. The GLCmax for annual PM_{10} and $PM_{2.5}$ is the maximum predicted concentration over five years of meteorological data.

The GLCmax for 24-hr and annual $PM_{2.5}$ reported in the table above represent the total predicted concentrations associated with modeling the direct $PM_{2.5}$ emissions and the contributions associated with secondary $PM_{2.5}$ formation (discussed above in the NAAQS Analysis section).

E. Additional Impacts Analysis

The applicant performed an Additional Impacts Analysis as part of the PSD AQA. The applicant conducted a growth analysis and determined that population will not significantly increase as a result of the proposed project. The applicant conducted a soils and vegetation analysis and determined that all evaluated criteria pollutant concentrations are below their respective secondary NAAQS. The applicant meets the Class II visibility analysis requirement by complying with the opacity requirements of 30 TAC Chapter 111.

The Additional Impacts Analyses are reasonable and possible adverse impacts from this project are not expected.

The ADMT evaluated predicted concentrations from the proposed project to determine if emissions could adversely affect a Class I area. The nearest Class I area, Wichita Mountains Wilderness, is located approximately 225 kilometers (km) from the proposed site.

The H_2SO_4 24-hr maximum predicted concentration of 7 µg/m^3 occurred approximately 243 meters from the property line towards the west. The H_2SO_4 24-hr maximum predicted concentration occurring at the edge of the receptor grid, 10.6 km from the proposed sources, in the direction of the Wichita Mountains Wilderness Class I area is 0.526 µg/m^3. The Wichita Mountains Wilderness Class I area is an additional 214.4 km from the edge of the receptor grid. Therefore, emissions of H_2SO_4 from the proposed project are not expected to adversely affect the Wichita Mountains Wilderness Class I area.

The predicted concentrations of PM_{10}, $PM_{2.5}$, NO_2, and SO_2 for all averaging times, are all less than de minimis levels at a distance of 7.3 km from the proposed sources in the direction the Wichita Mountains Wilderness Class I area. The Wichita Mountains Wilderness Class I area is an additional 217.7 km from the location where the predicted concentrations of PM_{10}, $PM_{2.5}$, NO_2, and SO_2 for all averaging times are less than de minimis. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wilderness Class I area.

F. Minor Source NSR and Air Toxics Analysis

Table 6. Site-wide Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax (µg/m^3)	Standard (µg/m^3)
SO_2	1-hr	12	1021
H_2SO_4	1-hr	22	50
H_2SO_4	24-hr	7	15

Table 7. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (µg/m^3)	Background (µg/m^3)	Total Conc. = [Background + GLCmax] (µg/m^3)	Standard (µg/m^3)
Pb	3-mo	0.0001	0.02	0.0201	0.15

The 3-mo Pb GLCmax is based on the maximum monthly predicted concentration over a one-year period.

A background concentration for Pb was obtained from the EPA AIRS monitor 480850029 located at 7202 Stonebrook Parkway, Frisco, Collin County. The highest 3-month rolling average from 2020-2022 was used for the 3-month value. The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site.

Table 8. Minor NSR Site-wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax ($\mu g/m^3$)	GLCmax Location	ESL ($\mu g/m^3$)
ammonia	7664-14-7	1-hr	17	Eastern Property Line	180
hydrogen chloride	7647-01-0	1-hr	0.3	--	190
hydrogen chloride	7647-01-0	Annual	0.01	--	7.9
mercury	7439-97-6	1-hr	0.0004	--	0.25
portland cement	65997-15-1	1-hr	53	Southern Property Line	50
portland cement	65997-15-1	Annual	1	15m N	5
silica, crystalline (quartz)	14808-60-7	1-hr	2	Northern Property Line	14
silica, crystalline (quartz)	14808-60-7	Annual	0.07	Southern Property Line	0.27

Table 9. Minor NSR Hours of Exceedance for Health Effects

Pollutant	Averaging Time	1 X ESL GLCni
portland cement	1-hr	1

The GLCmax locations are listed in Table 8 above by their approximate distance and direction from the property line of the project site. The GLCmax also represents the GLCni. The GLCmax locations for hydrogen chloride and mercury are not available since the applicant relied on generic modeling (see discussion below).

3. Model Used and Modeling Techniques

AERMOD (Version 22112) was used in a refined screening mode.

For the Pb NAAQS analysis, H_2SO_4 State Property Line analyses, and mercury and hydrogen chloride health effects analyses, a unitized emission rate of 1 lb/hr was used to predict a generic short-term and long-term impact for each source. The generic impact was multiplied by the proposed pollutant specific emission rates to calculate a maximum predicted concentration for each source. The maximum predicted concentration for each source was summed to get a total predicted concentration for each pollutant.

The applicant evaluated two scenarios representing the two operating modes of EPN 21-SK-230 that affect the modeled parameters. EPN 21-SK-230 represents the shared stack for the natural gas fired preheater / precalciner kiln system with inline raw mill and clinker cooler. Modeling scenario 21SK_ON represents the stack parameters for the raw mill on and modeling scenario 21SK_OFF represents the raw mill off. Results from the worst-case source (21SK_OFF) are reported in the tables above and included in the full Increment analyses, full NAAQS analyses, and sitewide health effects analyses.

The applicant conducted the 1-hr and annual NO_2 NAAQS analyses using the ARM2 model option following EPA guidance.

A. Land Use

Low roughness and elevated terrain were used in the modeling analysis. These selections are consistent with the AERSURFACE analysis, topographic map, DEMs, and aerial photography. The selection of low roughness is reasonable.

B. Meteorological Data

Surface Station and ID: Denton, TX (Station #: 3991)
Upper Air Station and ID: Fort Worth, TX (Station #: 3990)
Meteorological Dataset: 2017-2021 for all PSD analyses, 2020 for all minor analyses
Profile Base Elevation: 195.7 meters

C. Receptor Grid

The grid modeled was sufficient in density and spatial coverage to capture representative maximum ground-level concentrations and exceedances.

D. Building Wake Effects (Downwash)

Input data to Building Profile Input Program Prime (Version 04274) are consistent with the plot plan and modeling report.

4. Modeling Emissions Inventory

The modeled emission point, area and volume source parameters and rates were consistent with the modeling report. The source characterizations used to represent the sources were appropriate.

For the 1-hr SO_2 and 1-hr NO_2 de Minimis and NAAQS analyses, emissions from the emergency generator engine (EPN EG-1) were modeled with an annual average emission rate, consistent with EPA guidance for evaluating intermittent emissions. Emissions from the emergency generator engine were represented to occur for no more than 100 hours per year.

For the 24-hr PM_{10} and 24-hr $PM_{2.5}$ analyses, the maximum hourly emission rate for the emergency generator engine (EPN EG-1) was divided by 24 to account for one hour of operation within a 24-hr period.

For the 24-hr PM_{10} and 24-hr $PM_{2.5}$ analyses, the maximum hourly emission rate for model ID: MSSVACLD was modeled with an average rate. Emissions from model ID: MSSVACLD were represented to occur for 8 hours per day.

For the 24-hr PM_{10} and 24-hr $PM_{2.5}$ analyses, the maximum hourly emission rate for model ID: MSSVACUL was modeled with an average rate. Emissions from model ID: MSSVACUL were represented to occur for 1 hour per day.

For the 24-hr PM_{10} and 24-hr $PM_{2.5}$ analyses, the maximum hourly emission rate for model ID: MSSRFAC was modeled with an average rate. Emissions from model ID: MSSRFAC were represented to occur for 12 hours per day.

Except as mentioned above, maximum allowable hourly emission rates were used for the short-term averaging time analyses, and annual average emission rates were used for the annual averaging time analyses.

TCEQ Interoffice Memorandum

To: Joel Stanford
Mechanical/Coatings Section

Thru: Chad Dumas, Team Leader
Air Dispersion Modeling Team (ADMT)

From: Daniel Jamieson
ADMT

Date: January 31, 2024

Subject: Second Air Quality Analysis Audit – BM Dorchester LLC (RN111368437)

1. Project Identification Information

Permit Application Number: 167047
NSR Project Number: 335160
ADMT Project Number: 8899
County: Grayson
Published Map: \\tceq4avmgisdata\GISWRK\APD\MODEL PROJECTS\8899\8899.pdf

Air Quality Analysis: Submitted by Trinity Consultants, June 2023, on behalf of BM Dorchester LLC. Additional information was provided July and November, 2023 and January 2024.

This is the second modeling audit for this NSR project number. The second audit was conducted to review updated NO_x emissions and MSS emissions for the kiln (EPN 21-SK-230). This memo represents a complete summary and supersedes the previous modeling audit memo dated July 17, 2023 (WCC content ID 6608297).

2. Report Summary

The air quality analysis (AQA) is acceptable for all review types and pollutants. The results are summarized below.

A. De Minimis Analysis

A De Minimis analysis was initially conducted to determine if a full impacts analysis would be required. The De Minimis analysis modeling results indicate that 1-hr SO_2, 24-hr and annual PM_{10}, 24-hr and annual $PM_{2.5}$ (NAAQS), 24-hr and annual $PM_{2.5}$ (Increment), and 1-hr NO_2 exceed the respective de minimis concentrations and require a full impacts analysis. The De Minimis analysis modeling results for 3-hr, 24-hr, and annual SO_2, annual NO_2, and 1-hr and 8-hr CO indicate that the project is below the respective de minimis concentrations and no further analysis is required.

The justification for selecting the EPA's interim 1-hr NO_2 and 1-hr SO_2 De Minimis levels is based on the assumptions underlying EPA's development of the 1-hr NO_2 and 1-hr SO_2 De Minimis levels. As explained in EPA guidance memoranda[1,2], the EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO_2 and 1-hr SO_2 NAAQS.

The $PM_{2.5}$ and ozone De Minimis levels are the EPA recommended De Minimis levels. The use of the EPA recommended De Minimis levels is sufficient to conclude that a proposed source will not cause or contribute to a violation of an ozone and $PM_{2.5}$ NAAQS or $PM_{2.5}$

[1] www.epa.gov/sites/production/files/2015-07/documents/appwso2.pdf
[2] www.tceq.texas.gov/assets/public/permitting/air/memos/guidance_1hr_no2naaqs.pdf

PSD increments based on the analyses documented in EPA guidance and policy memoranda[3].

While the De Minimis levels for both the NAAQS and increment are identical for $PM_{2.5}$ in the table below, the procedures to determine significance (that is, predicted concentrations to compare to the De Minimis levels) are different. This difference occurs because the NAAQS for $PM_{2.5}$ are statistically-based, but the corresponding increments are exceedance-based.

Table 1. Modeling Results for PSD De Minimis Analysis in Micrograms Per Cubic Meter (µg/m³)

Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (µg/m³)
SO_2	1-hr	12	7.8
SO_2	3-hr	12	25
SO_2	24-hr	4.5	5
SO_2	Annual	0.3	1
PM_{10}	24-hr	10	5
PM_{10}	Annual	3	1
$PM_{2.5}$ (NAAQS)	24-hr	7.2	1.2
$PM_{2.5}$ (NAAQS)	Annual	2.5	0.2
$PM_{2.5}$ (Increment)	24-hr	8.7	1.2
$PM_{2.5}$ (Increment)	Annual	2.7	0.2
NO_2	1-hr	19	7.5
NO_2	Annual	0.4	1
CO	1-hr	769	2000
CO	8-hr	276	500

The GLCmax for 1-hr SO_2, 1-hr NO_2, and 24-hr and annual $PM_{2.5}$ (NAAQS) are based on the highest five-year averages of the maximum predicted concentrations determined for each receptor. The GLCmax for all other pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

Intermittent guidance was relied on for the 1-hr SO_2 and 1-hr NO_2 PSD De Minimis analyses.

[3] www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html

Note the updated NO_x emission rates for the kiln (EPN 21-SK-230) are less than the representations made in the original modeling demonstration. The applicant did not update the NO_2 modeling for this demonstration. The NO_2 results reported above in Table 1 are conservative.

To evaluate secondary $PM_{2.5}$ impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with the EPA's Guideline on Air Quality Models (GAQM). Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutants impacts from a source. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary $PM_{2.5}$ concentrations of 0.18949 µg/m^3 and 0.00231 µg/m^3, respectively. Since the combined direct and secondary 24-hr and annual $PM_{2.5}$ impacts are above the De minimis levels, a full impacts analysis is required.

Table 2. Modeling Results for Ozone PSD De Minimis Analysis in Parts per Billion (ppb)

Pollutant	Averaging Time	GLCmax (ppb)	De Minimis (ppb)
O_3	8-hr	0.997	1

The applicant performed an O_3 analysis as part of the PSD AQA. The applicant evaluated project emissions of O_3 precursor emissions (NO_x and VOC) based on a Tier 1 demonstration approach consistent with the EPA's GAQM referred to as MERPs. Using data associated with the 500 tpy and 1000 tpy Parker County source, the applicant estimated an 8-hr O_3 concentration of 0.99718 ppb. When the estimates of ozone concentrations from the project emissions are added together, the results are less than the De Minimis level.

B. Air Quality Monitoring

The De Minimis analysis modeling results indicate that 24-hr PM_{10} exceeds the respective monitoring significance level and requires the gathering of ambient monitoring information.

The De Minimis analysis modeling results indicate that 24-hr SO_2, annual NO_2, and 8-hr CO are below their respective monitoring significance level.

Table 3. Modeling Results for PSD Monitoring Significance Levels

Pollutant	Averaging Time	GLCmax (µg/m^3)	Significance (µg/m^3)
SO_2	24-hr	4.5	13
PM_{10}	24-hr	10.1	10
NO_2	Annual	0.4	14
CO	8-hr	276	575

The GLCmax for all pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

Note the updated NO_x emission rates for the kiln (EPN 21-SK-230) are less than the representations made in the original modeling demonstration. The applicant did not update the NO_2 modeling for this demonstration. The annual NO_2 result reported above in Table 3 is conservative.

The applicant evaluated ambient PM_{10} and $PM_{2.5}$ monitoring data to satisfy the requirements for the pre-application air quality analysis.

A background concentration for PM_{10} was obtained from the EPA AIRS monitor 481130050 located at 717 South Akard St. Dallas, Dallas County. The high, second high monitored concentration from 2020-2022 was used for the 24-hr value (82 µg/m^3). The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site. The background concentration was also used in the NAAQS analysis.

Background concentrations for $PM_{2.5}$ were obtained from the EPA AIRS monitor 481210034 located at Denton Airport South, Denton, Denton County. The applicant calculated the three-year average (2020-2022) of the 98th percentile of the annual distribution of the 24-hr concentrations for the 24-hr value (20 µg/m^3). The applicant used a three-year average (2020-2022) of the annual concentrations for the annual value (7.5 µg/m^3). The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site. The background concentrations were also used in the NAAQS analysis.

Since the project has a net emissions increase of 100 tpy or more of VOC or NO_x, the applicant evaluated ambient O_3 monitoring data to satisfy the requirements for the pre-application air quality analysis.

The applicant identified the Pilot Point ozone monitor (EPA AQS 481211032) as a conservative monitor for the proposed project site location. The applicant further noted how the Pilot Point monitor is located within the Dallas-Fort Worth (DFW) ozone non-attainment area and summarized the 2020-2022 ozone design value for the monitor without further refinement. The ADMT has reviewed the ozone monitoring data for further refinement and this review is discussed below.

Initially, during the modeling protocol development, the applicant had proposed using the Greenville ozone monitor (EPA AQS 482311006) for the proposed project site location. The ADMT had commented that the proposed project site location is likely to be located downwind of the DFW ozone non-attainment area more often than the selected Greenville monitor, based on wind data, and it is likely that the Greenville monitor would not be representative of the proposed project site location for all wind directions and should not be exclusively used in the pre-application analysis.

The ADMT reviewed monitoring data from two additional ozone monitors to identify ozone concentrations during times when the proposed project site location could have been located downwind of the DFW ozone non-attainment area – the above-mentioned Pilot Point monitor and the Frisco monitor (EPA AQS 480850005). Collectively, the information from these two monitors, along with the Greenville monitor, gives a complete analysis for the proposed project site location.

The Pilot Point ozone monitor is located to the southwest of the proposed project site location. A sector was defined with an origin at the Pilot Point monitor and that covered the extent of the modeled receptor grid surrounding the proposed project site location. The sector was then used to identify wind directions favorable for transport towards the

proposed project site location (220–265 degrees). Ozone data were reviewed during these wind directions for years 2020-2022 and the highest fourth highest daily maximum hourly value from all three years was 64 ppb. This would be a conservative metric for the ozone design value; the ozone design value is based on a three-year average of the fourth highest daily maximum rolling 8-hr average.

The Frisco ozone monitor is located to the south-southwest of the proposed project site location. Similar to the Pilot Point ozone monitor described above, a sector was defined with an origin at the Frisco monitor and that covered the extent of the modeled receptor grid surrounding the proposed project site location. The sector was then used to identify wind directions favorable for transport towards the proposed project site location (178–215 degrees). Ozone data were reviewed during these wind directions for years 2020-2022 and the highest fourth highest daily maximum rolling 8-hr average value from all three years was 69 ppb. This would be a conservative metric for the ozone design value; the ozone design value is based on a three-year average of the fourth highest daily maximum rolling 8-hr average.

The Greenville ozone monitor has an ozone design value of 63 ppb for the years 2020-2022.

C. National Ambient Air Quality Standard (NAAQS) Analysis

The De Minimis analysis modeling results indicate 1-hr SO_2, 24-hr and annual PM_{10}, 24-hr and annual $PM_{2.5}$, and 1-hr NO_2 exceed the respective de minimis concentration and require a full impacts analysis. The full NAAQS modeling results indicate the total predicted concentrations will not result in an exceedance of the NAAQS.

Table 4. Total Concentrations for PSD NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (µg/m^3)	Background (µg/m^3)	Total Conc. = [Background + GLCmax] (µg/m^3)	Standard (µg/m^3)
SO_2	1-hr	11	16	27	196
PM_{10}	24-hr	10	82	92	150
$PM_{2.5}$	24-hr	6	20	26	35
$PM_{2.5}$	Annual	2.6	7.5	10.1	12
NO_2	1-hr	87	see discussion below	87	188

The 1-hr SO_2 GLCmax is the highest five-year average of the 99th percentile of the annual distribution of predicted daily maximum 1-hr concentrations determined for each receptor.

The 24-hr PM_{10} GLCmax is the maximum predicted concentration over five years of meteorological data.

The 24-hr $PM_{2.5}$ GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted 24-hr concentrations determined for each receptor.

The annual $PM_{2.5}$ GLCmax is the maximum five-year average of the annual concentrations determined for each receptor.

The 1-hr NO_2 GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted daily maximum 1-hr concentrations determined for each receptor.

Note the updated NO_x emission rates for the kiln (EPN 21-SK-230) are less than the representations made in the original modeling demonstration. The applicant did not update the NO_2 modeling for this demonstration. The 1-hr NO_2 result reported above in Table 4 is conservative.

A background concentration for SO_2 was obtained from the EPA AIRS monitor 481390016 located at 2725 Old Fort Worth Rd., Midlothian, Ellis County. A three-year average (2019-2021) of the 99th percentile of the annual distribution of daily maximum 1-hr concentrations was used for the 1-hr value. The applicant reviewed more recent monitoring data from EPA AIRS monitor 482570005 and determined the outcome of the analysis would not change. The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site.

A background concentration for NO_2 was obtained from the EPA AIRS monitor 481210034 located at Denton Airport South, Denton, Denton County. The applicant determined the 98th percentile of the annual distribution of the maximum 1-hr concentrations for each hour of the day (using data from 2020-2022), consistent with EPA guidance. These background values were then used in the model (as hourly background scalars) with the BACKGRND keyword to be combined with model predictions, giving a total predicted concentration. The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site.

As stated above, to evaluate secondary $PM_{2.5}$ impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with the EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as MERPs. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary $PM_{2.5}$ concentrations of 0.18949 µg/m^3 and 0.00231 µg/m^3, respectively. When these estimates are added to the GLCmax listed in Table 4 above, the results are less than the NAAQS.

D. Increment Analysis

The De Minimis analysis modeling results indicate that 24-hr and annual PM_{10} and 24-hr and annual $PM_{2.5}$ exceed the respective de minimis concentrations and require a PSD increment analysis.

Table 5. Results for PSD Increment Analysis

Pollutant	Averaging Time	GLCmax (µg/m^3)	Increment (µg/m^3)
PM_{10}	24-hr	29	30
PM_{10}	Annual	3	17
$PM_{2.5}$	24-hr	8.7	9
$PM_{2.5}$	Annual	2.7	4

The GLCmax for 24-hr $PM_{2.5}$ and 24-hr PM_{10} are the maximum high, second high (H2H) predicted concentrations across five years of meteorological data. The GLCmax for annual

PM_{10} and $PM_{2.5}$ are the maximum predicted concentrations over five years of meteorological data.

The GLCmax for 24-hr and annual $PM_{2.5}$ reported in the table above represent the total predicted concentrations associated with modeling the direct $PM_{2.5}$ emissions and the contributions associated with secondary $PM_{2.5}$ formation (discussed above in the NAAQS Analysis section).

E. Additional Impacts Analysis

The applicant performed an Additional Impacts Analysis as part of the PSD AQA. The applicant conducted a growth analysis and determined that population will not significantly increase as a result of the proposed project. The applicant conducted a soils and vegetation analysis and determined that all evaluated criteria pollutant concentrations are below their respective secondary NAAQS. The applicant meets the Class II visibility analysis requirement by complying with the opacity requirements of 30 TAC Chapter 111. The Additional Impacts Analyses are reasonable and possible adverse impacts from this project are not expected.

The ADMT evaluated predicted concentrations from the proposed project to determine if emissions could adversely affect a Class I area. The nearest Class I area, Wichita Mountains Wilderness, is located approximately 225 kilometers (km) from the proposed site.

The H_2SO_4 24-hr maximum predicted concentration of 7 µg/m^3 occurred approximately 243 meters from the property line towards the west. The H_2SO_4 24-hr maximum predicted concentration occurring at the edge of the receptor grid, 10.6 km from the proposed sources, in the direction of the Wichita Mountains Wilderness Class I area is 0.526 µg/m^3. The Wichita Mountains Wilderness Class I area is an additional 214.4 km from the edge of the receptor grid. Therefore, emissions of H_2SO_4 from the proposed project are not expected to adversely affect the Wichita Mountains Wilderness Class I area.

The predicted concentrations of PM_{10}, $PM_{2.5}$, NO_2, and SO_2 for all averaging times, are all less than de minimis levels at a distance of 7.3 km from the proposed sources in the direction of the Wichita Mountains Wilderness Class I area. The Wichita Mountains Wilderness Class I area is an additional 217.7 km from the location where the predicted concentrations of PM_{10}, $PM_{2.5}$, NO_2, and SO_2 for all averaging times are less than de minimis. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wilderness Class I area.

F. Minor Source NSR and Air Toxics Analysis

Table 6. Site-wide Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax (µg/m^3)	Standard (µg/m^3)
SO_2	1-hr	12	1021
H_2SO_4	1-hr	22	50
H_2SO_4	24-hr	7	15

Table 7. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (µg/m^3)	Background (µg/m^3)	Total Conc. = [Background + GLCmax] (µg/m^3)	Standard (µg/m^3)
Pb	3-mo	0.0001	0.02	0.0201	0.15

The 3-mo Pb GLCmax is based on the maximum monthly predicted concentration over a one-year period.

A background concentration for Pb was obtained from the EPA AIRS monitor 480850029 located at 7202 Stonebrook Parkway, Frisco, Collin County. The highest 3-month rolling average from 2020-2022 was used for the 3-month value. The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site.

Table 8. Minor NSR Site-wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax (µg/m^3)	GLCmax Location	ESL (µg/m^3)
ammonia	7664-14-7	1-hr	17	Eastern Property Line	180
hydrogen chloride	7647-01-0	1-hr	0.3	--	190
hydrogen chloride	7647-01-0	Annual	0.01	--	7.9
mercury	7439-97-6	1-hr	0.0004	--	0.25
portland cement	65997-15-1	1-hr	53	Southern Property Line	50
portland cement	65997-15-1	Annual	1	15m N	5
silica, crystalline (quartz)	14808-60-7	1-hr	2	Northern Property Line	14
silica, crystalline (quartz)	14808-60-7	Annual	0.07	Southern Property Line	0.27

Table 9. Minor NSR Hours of Exceedance for Health Effects

Pollutant	Averaging Time	1 X ESL GLCni
portland cement	1-hr	1

The GLCmax locations are listed in Table 8 above by their approximate distance and direction from the property line of the project site. The GLCmax also represents the GLCni. The GLCmax locations for hydrogen chloride and mercury are not available since the applicant relied on generic modeling (see discussion below).

3. Model Used and Modeling Techniques

AERMOD (Version 22112) was used in a refined screening mode.

For the Pb NAAQS analysis, H_2SO_4 State Property Line analyses, and mercury and hydrogen chloride health effects analyses, a unitized emission rate of 1 lb/hr was used to predict a generic short-term and long-term impact for each source. The generic impact was multiplied by the proposed pollutant specific emission rates to calculate a maximum predicted concentration for each source. The maximum predicted concentration for each source was summed to get a total predicted concentration for each pollutant.

The applicant evaluated three scenarios representing the three operating modes of EPN 21-SK-230 that affect the modeled parameters. EPN 21-SK-230 represents the shared stack for the natural gas fired preheater / precalciner kiln system with inline raw mill and clinker cooler. Modeling scenario 21SK_ON represents the stack parameters for the raw mill on, modeling scenario 21SK_OFF represents the raw mill off, and modeling scenario Project MSS (model ID: 21SK_MSS) represents the kiln during warm-up. Results from the worst-case source (21SK_OFF) are reported in the tables above and included in the full Increment analyses, full NAAQS analyses, and sitewide health effects analyses.

The applicant conducted the 1-hr and annual NO_2 NAAQS analyses using the ARM2 model option following EPA guidance.

A. Land Use

Low roughness and elevated terrain were used in the modeling analysis. These selections are consistent with the AERSURFACE analysis, topographic map, DEMs, and aerial photography. The selection of low roughness is reasonable.

B. Meteorological Data

Surface Station and ID: Denton, TX (Station #: 3991)
Upper Air Station and ID: Fort Worth, TX (Station #: 3990)
Meteorological Dataset: 2017-2021 for all PSD analyses, 2020 for all minor analyses
Profile Base Elevation: 195.7 meters

C. Receptor Grid

The grid modeled was sufficient in density and spatial coverage to capture representative maximum ground-level concentrations and exceedances.

D. Building Wake Effects (Downwash)

Input data to Building Profile Input Program Prime (Version 04274) are consistent with the plot plan and modeling report.

4. Modeling Emissions Inventory

The modeled emission point, area, and volume source parameters and rates were consistent with the modeling report. The source characterizations used to represent the sources were appropriate.

For the 1-hr SO_2 and 1-hr NO_2 de Minimis and NAAQS analyses, emissions from the emergency generator engine (EPN EG-1) were modeled with an annual average emission rate, consistent with EPA guidance for evaluating intermittent emissions. Emissions from the emergency generator engine were represented to occur for no more than 100 hours per year.

According to the applicant, NO_x and CO MSS emissions from the kiln (EPN 21-SK-230) will be less than routine emissions. The applicant represented three planned MSS warm-up scenarios:

- Case 1: Kiln heat-up from cold after major refractory work - estimated to occur once per year at main maintenance stoppage (36 hours per event).
- Case 2: Kiln heat-up from cold after maintenance work without refractory work - estimated to occur once per year at secondary maintenance stoppage (12 hours per event).
- Case 3: Kiln heat-up from short stoppage for secondary maintenance work not requiring a full cooldown - estimated to occur about four times per year (6 hours per event).

The applicant provided a modeling analysis using the overall worst-case emission rate between all three cases (model ID: 21SK_MSS) for the 1-hr NO_x de Minimis analysis and 1-hr and 8-hr CO de Minimis analyses to demonstrate routine operations represent worst-case concentrations. Note the raw mill on (21SK_ON) and raw mill off (21SK_OFF) scenarios were considered in the demonstration.

For the 24-hr PM_{10} and 24-hr $PM_{2.5}$ analyses, the maximum hourly emission rate for the emergency generator engine (EPN EG-1) was divided by 24 to account for one hour of operation within a 24-hr period.

For the 24-hr PM_{10} and 24-hr $PM_{2.5}$ analyses, the maximum hourly emission rate for model ID: MSSVACLD was modeled with an average rate. Emissions from model ID: MSSVACLD were represented to occur for 8 hours per day.

For the 24-hr PM_{10} and 24-hr $PM_{2.5}$ analyses, the maximum hourly emission rate for model ID: MSSVACUL was modeled with an average rate. Emissions from model ID: MSSVACUL were represented to occur for 1 hour per day.

For the 24-hr PM_{10} and 24-hr $PM_{2.5}$ analyses, the maximum hourly emission rate for model ID: MSSRFAC was modeled with an average rate. Emissions from model ID: MSSRFAC were represented to occur for 12 hours per day.

Except as mentioned above, maximum allowable hourly emission rates were used for the short-term averaging time analyses, and annual average emission rates were used for the annual averaging time analyses.

TCEQ Interoffice Memorandum

To: Joel Stanford
Mechanical/Coatings Section

Thru: Chad Dumas, Team Leader
Air Dispersion Modeling Team (ADMT)

From: Daniel Jamieson
ADMT

Date: June 4, 2024

Subject: Third Air Quality Analysis Audit – BM Dorchester LLC (RN111368437)

1. Project Identification Information

Permit Application Number: 167047
NSR Project Number: 335160
ADMT Project Number: 9161
County: Grayson
Published Map: \\tceq4avmgisdata\GISWRK\APD\MODEL PROJECTS\9161\9161.pdf

Air Quality Analysis: Submitted by Trinity Consultants, April 2024, on behalf of BM Dorchester LLC. Additional information was provided May 2024.

This is the third modeling audit for this NSR project number. The third audit was conducted to review updated annual $PM_{2.5}$ modeling associated with revised $PM_{2.5}$ emission rates. This memo only addresses updates associated with the updated annual $PM_{2.5}$ modeling, and the results presented below supersede the corresponding results from the second modeling audit memo dated January 31, 2024 (WCC content ID 6912313).

2. Report Summary

The air quality analysis is acceptable for all review types. The results are summarized below.

A. De Minimis Analysis

A De Minimis analysis was initially conducted to determine if a full impacts analysis would be required. The De Minimis analysis modeling results indicate that annual $PM_{2.5}$ (NAAQS) and annual $PM_{2.5}$ (Increment) exceed the de minimis concentration and require a full impacts analysis.

The annual $PM_{2.5}$ De Minimis level is the EPA recommended De Minimis level. The use of the EPA recommended De Minimis level is sufficient to conclude that a proposed source will not cause or contribute to a violation of the $PM_{2.5}$ NAAQS or $PM_{2.5}$ PSD increments based on the analyses documented in EPA guidance and policy memoranda[1].

The applicant submitted the updated analysis prior to EPA finalizing the revised recommended $PM_{2.5}$ De Minimis levels. In an effort to be conservative, the applicant used a value of 0.1 $\mu g/m^3$ for the annual De Minimis level.

While the De Minimis levels for both the NAAQS and increment are identical for $PM_{2.5}$ in the table below, the procedures to determine significance (that is, predicted concentrations to compare to the De Minimis levels) are different. This difference occurs because the

[1] https://www.epa.gov/nsr/significant-impact-levels-ozone-and-fine-particles

NAAQS for $PM_{2.5}$ are statistically-based, but the corresponding increments are exceedance-based.

Table 1. Modeling Results for PSD De Minimis Analysis in Micrograms Per Cubic Meter (µg/m³)

Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (µg/m³)
$PM_{2.5}$ (NAAQS)	Annual	1.3	0.13
$PM_{2.5}$ (Increment)	Annual	1.4	0.13

The annual $PM_{2.5}$ (NAAQS) GLCmax is based on the highest five-year average of the maximum predicted concentrations determined for each receptor. The GLCmax for annual $PM_{2.5}$ (Increment) is the maximum predicted concentration over five years of meteorological data.

To evaluate secondary $PM_{2.5}$ impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with the EPA's Guideline on Air Quality Models (GAQM). Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutants impacts from a source. Using data associated with the 500 tpy Parker County source, the applicant estimated an annual secondary $PM_{2.5}$ concentration of 0.00231 µg/m³. Since the combined direct and secondary annual $PM_{2.5}$ impacts are above the De minimis level, a full impacts analysis is required.

B. National Ambient Air Quality Standard (NAAQS) Analysis

The De Minimis analysis modeling results indicate that annual $PM_{2.5}$ exceeds the de minimis concentration and requires a full impacts analysis. The full NAAQS modeling results indicate the total predicted concentration will not result in an exceedance of the NAAQS.

Table 2. Total Concentrations for PSD NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (µg/m³)	Background (µg/m³)	Total Conc. = [Background + GLCmax] (µg/m³)	Standard (µg/m³)
$PM_{2.5}$	Annual	1.3	7.5	8.8	9

The annual $PM_{2.5}$ GLCmax is the maximum five-year average of the annual concentrations determined for each receptor across five years of meteorological data.

A background concentration for $PM_{2.5}$ was obtained from the EPA AIRS monitor 481210034 located at Denton Airport South, Denton, Denton County. The applicant used a three-year average (2020-2022) of the annual concentrations for the annual value. The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site.

As stated above, to evaluate secondary $PM_{2.5}$ impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with the EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as

MERPs. Using data associated with the 500 tpy Parker County source, the applicant estimated an annual secondary $PM_{2.5}$ concentration of 0.00231 µg/m^3. When this estimate is added to the GLCmax listed in Table 2 above, the result is less than the NAAQS.

C. Increment Analysis

The De Minimis analysis modeling results indicate that annual $PM_{2.5}$ exceeds the de minimis concentration and requires a PSD increment analysis.

Table 3. Results for PSD Increment Analysis

Pollutant	Averaging Time	GLCmax (µg/m^3)	Increment (µg/m^3)
$PM_{2.5}$	Annual	1.4	4

The GLCmax represents the maximum predicted concentrations over five years of meteorological data.

The GLCmax for annual $PM_{2.5}$ reported in the table above represents the total predicted concentration associated with modeling the direct $PM_{2.5}$ emissions and the contributions associated with secondary $PM_{2.5}$ formation (discussed above in the NAAQS Analysis section).

3. Model Used and Modeling Techniques

AERMOD (Version 23132) was used in a refined screening mode.

4. Modeling Emissions Inventory

The modeled emission point, area, and volume source parameters and rates were consistent with the modeling report. The source characterizations used to represent the sources were appropriate.

Emissions from model id MSSVACLD were represented to occur for two hours per day.

Annual average emission rates were used for the annual averaging time analyses.

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Compliance History Report

Compliance History Report for CN605952373, RN111368437, Rating Year 2024 which includes Compliance History (CH) components from September 1, 2019, through August 31, 2024.

Customer, Respondent, or Owner/Operator: CN605952373, Bm Dorchester LLC **Classification:** UNCLASSIFIED **Rating:** -----

Regulated Entity: RN111368437, DORCHESTER PLANT **Classification:** UNCLASSIFIED **Rating:** -----

Complexity Points: 11 **Repeat Violator:** NO

CH Group: 10 - Cement and Concrete Product Manufacturing

Location: FROM THE INTERSECTION OF HIGHWAY 289 AND HIGHWAY 902 EAST OF DORCHESTER TX HEAD EAST ON HIGHWAY 902 FOR APPROXIMATELY 0.80 MI THE SITE WILL BE LOCATED DIRECTLY NORTH OF HIGHWAY 902 AFTER THE INTERSECTION OF TAYLOR RD GRAYSON, TX, GRAYSON COUNTY

TCEQ Region: REGION 04 - DFW METROPLEX

ID Number(s):
AIR NEW SOURCE PERMITS EPA PERMIT GHGPSDTX212
AIR NEW SOURCE PERMITS EPA PERMIT PSDTX1602
AIR NEW SOURCE PERMITS PERMIT 167047

Compliance History Period: September 01, 2019 to August 31, 2024 **Rating Year:** 2024 **Rating Date:** 09/01/2024

Date Compliance History Report Prepared: April 15, 2025

Agency Decision Requiring Compliance History: Permit - Issuance, renewal, amendment, modification, denial, suspension, or revocation of a permit.

Component Period Selected: November 08, 2016 to November 08, 2021

TCEQ Staff Member to Contact for Additional Information Regarding This Compliance History.

Name: TCEQ Staff Member **Phone:** (512) 239-0270

Site and Owner/Operator History:

1) Has the site been in existence and/or operation for the full five year compliance period? NO
2) Has there been a (known) change in ownership/operator of the site during the compliance period? NO

Components (Multimedia) for the Site Are Listed in Sections A - J

A. Final Orders, court judgments, and consent decrees:
N/A

B. Criminal convictions:
N/A

C. Chronic excessive emissions events:
N/A

D. The approval dates of investigations (CCEDS Inv. Track. No.):
N/A

E. Written notices of violations (NOV) (CCEDS Inv. Track. No.):
A notice of violation represents a written allegation of a violation of a specific regulatory requirement from the commission to a regulated entity. A notice of violation is not a final enforcement action, nor proof that a violation has actually occurred.
N/A

F. Environmental audits:
N/A

G. Type of environmental management systems (EMSs):
N/A

H. Voluntary on-site compliance assessment dates:
N/A

I. Participation in a voluntary pollution reduction program:
N/A

J. Early compliance:
N/A

Sites Outside of Texas:
N/A

Preliminary Determination Summary

BM Dorchester LLC
Permit Numbers 167047, PSDTX1602, and GHGPSDTX212

I. Applicant

BM Dorchester LLC
1008 Southview Cir
Center, TX 75935-4537

II. Project Location

Portland Cement Plant
Located at the following driving directions: from the intersection of Highway 289 and Highway 902 east of Dorchester head east on Highway 902 for approximately 0.80 miles - the site will be located directly north of Highway 902 after the intersection of Taylor Road

Dorchester, Grayson County, Texas 75459

III. Project Description

The Applicant has requested initial authorization of a cement kiln. Emissions from planned startup and shutdown activities will be authorized by this permit. Startup and shutdown emissions are virtually indistinguishable from productions emissions. Although there may be minor emissions associated with startup and shutdown, emission factors used to quantify production emissions are considered to have enough conservatism to include any incidental increases that may be attributed to startup and shutdown (see the kiln BACT discussion for more on this for that source).

IV. Emissions

Air Contaminant	Proposed Allowable Emission Rates (tpy)
PM	196.94
PM_{10}	196.28
$PM_{2.5}$	195.39
VOC	101.11
NO_X	290.15
CO	1606.48
SO_2	213.37
Pb	0.04
NH_3	57.00
H_2SO_4	58.66
HCl	10.41
CO2e*	989,654.90

*CO2e - carbon dioxide equivalents based on global warming potentials of CH4 = 25, N2O = 298, SF6=22,800.

V. Federal Applicability

The proposed site is located in Greyson County, which is classified as attainment for all criteria pollutants. Cement kilns are a PSD named source. Therefore, the PSD review threshold is 100 tpy for criteria pollutants. Once this threshold has been exceeded, each criteria pollutant and GHGs are compared against the PSD Significant Emission Rate (SER) to determine if the project triggers PSD review for these pollutants. The emissions of PM, PM_{10}, $PM_{2.5}$, CO, NO_X, SO_2, VOC, CO_2e (GHGs), and H_2SO_4 are greater than their corresponding SERs.

The following chart illustrates the annual project emissions for each pollutant and whether this pollutant triggers PSD review.

Pollutant	Project Emissions (tpy)	PSD Triggered Y/N
VOC	101.11	Y
NO_x	290.15	Y
SO_2	213.37	Y
CO	1606.48	Y
PM	196.94	Y
PM_{10}	196.28	Y
$PM_{2.5}$	195.39	Y
H_2SO_4	58.66	Y

The site is a major source for a non-GHG pollutant. In addition, the site has a potential to emit of more than 100,000 tpy CO2e which makes it a major source of GHG and PSD review is triggered.

Pollutant	Project Emissions (tpy)	Major Source or Major Mod Trigger Level (tpy)	PSD Triggered Y/N
CO2e	989,654.90	75,000	Y

The proposed emissions include MSS scenarios, which are not expected to exceed normal operational emissions.

VI. Control Technology Review

The proposed control technology is consistent with PSD BACT for PSD pollutants and state minor BACT for non-PSD pollutants. A control technology review was conducted for all pollutants. The controls described in this section were determined to satisfy BACT requirements based on a review of recently issued permits from Texas and other states, and consideration of the RACT/BACT/LAER Clearinghouse (RBLC) data provided by the applicant. MSS emissions are not expected to exceed normal operation given the nature of most of the sources at this facility (baghouse controlled or fugitive emissions). The section on the kiln below contains information relating to startup scenarios provided by the Applicant which describe why startup emissions for the kiln are not expected to exceed normal operational scenarios.

Source Name	EPN	Best Available Control Technology Description
Kiln System	21-SK-230	**PM, PM_{10}, $PM_{2.5}$:** Add on control: Baghouse at 0.002 grains per dry standard cubic foot (gr/dscf). 5% opacity. PM, PM10, PM2.5 (filterable): 0.02 lbs. PM per ton of clinker on a 1-hour average and a rolling 12-month average PM, PM10, PM2.5 (condensable): 0.28 lbs. PM per ton of clinker on a 1-hour average, 30-day rolling average, and a rolling 12-month average. **CO:** No add on controls. BACT determination based on other kilns. 9.0 lbs of CO/ton of clinker on a 1-hour average and 30-day rolling average. 3.0 lbs. of CO/ton of clinker on a rolling 12-month average. **NO_x:** Add on and other control: Selective Catalytic Reduction (SCR) system or combination of SCR and Selective Non-Catalytic Reduction (SNCR) system, staged combustion, low NOx burners, good combustion practices. Notably the proposed NO_x rate exceeds RBLC PSD and state BACT, which is typically 1.5 lb/ton of clinker compared to the 0.54 lb/ton of clinker proposed. 0.54 lbs. of NO_x per ton of clinker on a 1-hour rolling average, 30-day rolling average, and 12 month rolling average. **SO_2:** Add on and other control: Scrubber with a represented control efficiency of 90%, the alkali absorption inherent in the pre-calciner kiln, and

Source Name	EPN	Best Available Control Technology Description
		the use of low sulfur content natural gas as fuel. 0.60 lbs. SO2 per ton of clinker on a 1-hour rolling average, 0.40 lb per ton of clinker on a 30-day and 12 month rolling average. **VOC:** No add on controls. Good combustion practices. 24 ppmv at 7% O2 for THC on a 1-hour average, 30-day rolling average, and 12 month rolling average. Note that VOC levels are related to composition and concentration of organic materials in the quarry and BACT determinations are driven by this. **O-HAP** No add on controls. 12 ppmvd total organic HAP on a 30-day rolling average and 12 month rolling average. Note that this rate is based on preliminary organic information from the quarry. **Dioxins and Furans** No add on controls. 0.20 nanograms per dry standard cubic meter (TEQ), corrected to 7 % O2 on a 30-day rolling average and 12 month rolling average. **H_2SO_4:** Add on and other control: scrubber. The control efficiency of the scrubber will be specified in an as-built modification. 1.10 lbs. per ton of clinker on an hourly basis when the in-line raw mill and scrubber are not operating. 0.11 lbs. per ton of clinker on a 12-month rolling average basis. **HCl:** No add on controls. 3 ppmvd corrected to 7% O_2 on a 30-day rolling average and 12 month rolling average. **Hg** No add on controls. 0.000021 lb/ton of clinker on a 30-day rolling average and 12 month rolling average. **Pb** 7.50E-05 lb/ton of clinker on a 30-day rolling average and 12 month rolling average.

Source Name	EPN	Best Available Control Technology Description
		GHG: No add on controls. Proper design and operation. 0.92 lbs. per ton of clinker on a 30 day rolling average. **NH_3 (SCR):** No add on controls. Operation in a manner to minimize ammonia slip. 35 ppmv at 7% O_2 on a 30-day rolling average. **MSS:** The Applicant has represented the following in relation to kiln startup and shutdown: The SCR will be operating at all times when fuel is being fired in the kiln/pre-heater except during kiln heat-ups at the beginning of startup. During these times, no raw materials will be fed into the kiln. During a cold startup after major refractory work, it will take about 36 hours to heat up the kiln. This operation is expected to only occur once per year. During the kiln heat-up process, NO_x emissions are estimated to range from 3 to 12 lb/hr based the AP-42 Table 1.4-1 NO_x emission factor for a large (>100 MMBtu/hr) boiler equipped with a low NO_x burner*. This NO_x emission rate range is well below the proposed MAERT NO_x limit for normal kiln operations of 75.34 lb/hr, which is less than the kiln emission rate of 143.7 lb/hr evaluated in the Air Quality Analysis (AQA) submitted along with the initial application materials. During these kiln heat-up periods, supplemental air will be added to ensure that any combustion emissions are being exhausted. Although stack flow and temperature during these kiln heat-up periods have not been quantified, any reduction in dispersion due to stack flow and/or temperature is not expected to offset the ~13X lower NO_x emissions expected during planned kiln MSS periods shown in the example below. In addition, the total planned kiln MSS operating hours per year are expected to be not more than 72 hr/yr, which would qualify as an intermittent source under TCEQ and US EPA modeling guidance. The expected planned MSS hours are listed below: Case 1 - Kiln heat-up from cold after major refractory work - estimated to occur once per year at main maintenance stoppage (36 hrs per event)

Source Name	EPN	Best Available Control Technology Description
		Case 2 - Kiln heat-up from cold after maintenance work w/o refractory work - estimated to occur once per year at secondary maintenance stoppage (12 hrs per event) Case 3 - Kiln heat-up from short stoppage for secondary maintenance work not requiring a full cool-down - estimated to occur about four times per year (6 hrs per event) Example Calculation - Maximum heat input during any warm-up case is not expected to exceed 81 MMBtu/hr. Therefore, the maximum NO_x emissions during warm-up periods are estimated as follows: 81 MMBtu/hr * 140 lb $NO_x/10^6$ scf / 1020 Btu/scf = 11.15 lb/hr NO_x * It should be noted that the factor used for the qualitative comparison above is conservative in that it reflects a low NO_x burner for a large (>100 MMBtu/hr) combustion unit; however, given that the kiln burner is a low NO_x burner rated at less than 100 MMBtu/hr (peak heat input during a start-up is expected to be approximately 81 MMBtu/hr), the NO_x emissions from the kiln burner during start-up could be as much as 36X lower than the emissions modeled in the AQA.
Finish Mill and Air Heater	51-SK-250	15.9 MMBtu/hr heater: **NO_x**: 0.01 lb/MMBtu based on the higher heating value of the fuel and the use of a low NOx burner. **PM, PM_{10}, $PM_{2.5}$:** Add on control: Baghouse at 0.005 gr/dscf. 5% opacity.
Crusher, Milling, Raw Material Handling, and Product Handling	BF-Series EPNs (Numerous)	**PM, PM_{10}, $PM_{2.5}$:** Add on control: Baghouse at 0.0025 gr/dscf. 5% opacity.
Limestone, Gypsum, High Grade Limestone, and Sand Stockpiles	LS STKPL, ADD STKPL	**PM, PM_{10}, $PM_{2.5}$:** 90% reduction. Stockpiles will be required to be stored within a fully enclosed building.
Ammonia handling	NH3FUG	**NH_3:** AVO checks once per shift (28AVO). A control efficiency of 93-97% - dependent on the piping component type.
Emergency Generator Engine	EG-1	**Products of combustion**:

Source Name	EPN	Best Available Control Technology Description
		Limited to pipeline quality natural gas. Subject to 40 CFR Part 60 JJJJ and Part 63 ZZZZ. Operation is limited to 100 hours per year. A non-resettable hour meter is required in the Special Conditions.
Raw Material Loading	RR_MH, TRK_MH	**PM, PM_{10}, $PM_{2.5}$:** 85% reduction. Partial enclosure defined as consisting of two sided (rail loading) or three-sided walls (truck loading) with fogging nozzles. Dustless telescopic spouts are required be used for loading trucks or rail from bins or silos. 85% is conservative given the additional controls and aspiration on this system.
Raw Material Handling (Crusher Building)	LSCRSHBD_MH	**PM, PM_{10}, $PM_{2.5}$:** 85% reduction. The actual crusher is controlled by a baghouse, this EPN is the dump into the crushing system. Partial enclosure is defined as three-sided walls with fogging nozzles. The operation is represented as taking place within the crusher's building, and the crusher loading hopper will be located below-grade to accommodate trucks dumping mined limestone. Therefore, 85% is expected to be a conservative control efficiency.
Silo Loading	N/A	Dustless telescoping spouts are required for these. This removes the units as potential fugitive dust sources, and emissions would be associated with the baghouses/dust collectors which control these units.
ILE MSS Activities	MSS FUG	**Refractory Removal:** **PM, PM_{10}, $PM_{2.5}$:** Refractory (a bricklike material) is removed as needed for repairs or replacement. Operations taking place inside the kiln or cooler will be enclosed by nature, resulting in a 90% reduction in emissions. Drop into trucks was accounted for with no controls. **Vacuum Truck Loading and Unloading:** **PM, PM_{10}, $PM_{2.5}$:** Partial enclosure will be utilized for an 85% reduction on loadouts. The trucks have a filter with an outlet grain loading of 0.01 gr/dscf for loading operations. **CEMS Calibration** **NO_x, CO, THC, SO_2** Emissions are due to the release of calibration gas from the feed analyzers and CEMS unit. No add on controls.

VII. Air Quality Analysis

The air quality analysis (AQA) is acceptable for all review types and pollutants. The results are summarized below.

A. De Minimis Analysis

A De Minimis analysis was initially conducted to determine if a full impacts analysis would be required. The De Minimis analysis modeling results indicate that 1-hr SO_2, 24-hr and annual PM_{10}, 24-hr and annual $PM_{2.5}$ (NAAQS), 24-hr and annual $PM_{2.5}$ (Increment), and 1-hr NO_2 exceed the respective de minimis concentrations and require a full impacts analysis. The De Minimis analysis modeling results for 3-hr, 24-hr, and annual SO_2, annual NO_2, and 1-hr and 8-hr CO indicate that the project is below the respective de minimis concentrations and no further analysis is required.

The justification for selecting the EPA's interim 1-hr NO_2 and 1-hr SO_2 De Minimis levels is based on the assumptions underlying EPA's development of the 1-hr NO_2 and 1-hr SO_2 De Minimis levels. As explained in EPA guidance memoranda[1,2], the EPA believes it is reasonable as an interim approach to use a De Minimis level that represents 4% of the 1-hr NO_2 and 1-hr SO_2 NAAQS.

The $PM_{2.5}$ and ozone De Minimis levels are the EPA recommended De Minimis levels. The use of the EPA recommended De Minimis levels is sufficient to conclude that a proposed source will not cause or contribute to a violation of an ozone and $PM_{2.5}$ NAAQS or $PM_{2.5}$ PSD increments based on the analyses documented in EPA guidance and policy memoranda[3].

While the De Minimis levels for both the NAAQS and increment are identical for $PM_{2.5}$ in the table below, the procedures to determine significance (that is, predicted concentrations to compare to the De Minimis levels) are different. This difference occurs because the NAAQS for $PM_{2.5}$ are statistically-based, but the corresponding increments are exceedance-based.

Table 1. Modeling Results for PSD De Minimis Analysis in Micrograms Per Cubic Meter (µg/m³)

Pollutant	Averaging Time	GLCmax (µg/m³)	De Minimis (µg/m³)
SO_2	1-hr	12	7.8
SO_2	3-hr	12	25
SO_2	24-hr	4.5	5
SO_2	Annual	0.3	1

[1] www.epa.gov/sites/production/files/2015-07/documents/appwso2.pdf
[2] www.tceq.texas.gov/assets/public/permitting/air/memos/guidance_1hr_no2naaqs.pdf
[3] www.tceq.texas.gov/permitting/air/modeling/epa-mod-guidance.html

Pollutant	Averaging Time	GLCmax (µg/m^3)	De Minimis (µg/m^3)
PM_{10}	24-hr	10	5
PM_{10}	Annual	3	1
$PM_{2.5}$ (NAAQS)	24-hr	7.2	1.2
$PM_{2.5}$ (NAAQS)	Annual	2.5	0.2
$PM_{2.5}$ (Increment)	24-hr	8.7	1.2
$PM_{2.5}$ (Increment)	Annual	1.4	0.13
NO_2	1-hr	19	7.5
NO_2	Annual	0.4	1
CO	1-hr	769	2000
CO	8-hr	276	500

The GLCmax for 1-hr SO_2, 1-hr NO_2, and 24-hr and annual $PM_{2.5}$ (NAAQS) are based on the highest five-year averages of the maximum predicted concentrations determined for each receptor. The GLCmax for all other pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

Intermittent guidance was relied on for the 1-hr SO_2 and 1-hr NO_2 PSD De Minimis analyses.

Note the updated NO_x emission rates for the kiln (EPN 21-SK-230) are less than the representations made in the original modeling demonstration. The applicant did not update the NO_2 modeling for this demonstration. The NO_2 results reported above in Table 1 are conservative.

To evaluate secondary $PM_{2.5}$ impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with the EPA's Guideline on Air Quality Models (GAQM). Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as Modeled Emission Rates for Precursors (MERPs). The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutants impacts from a source. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary $PM_{2.5}$ concentrations of 0.18949 µg/m^3 and 0.00231 µg/m^3, respectively. Since the combined direct and secondary 24-hr and annual $PM_{2.5}$ impacts are above the De minimis levels, a full impacts analysis is required.

Table 2. Modeling Results for Ozone PSD De Minimis Analysis in Parts per Billion (ppb)

Pollutant	Averaging Time	GLCmax (ppb)	De Minimis (ppb)
O_3	8-hr	0.997	1

The applicant performed an O_3 analysis as part of the PSD AQA. The applicant evaluated project emissions of O_3 precursor emissions (NO_x and VOC) based on a Tier 1 demonstration approach consistent with the EPA's GAQM referred to as MERPs. Using data associated with the 500 tpy and 1000 tpy Parker County source, the applicant estimated an 8-hr O_3 concentration of 0.99718 ppb. When the estimates of ozone concentrations from the project emissions are added together, the results are less than the De Minimis level.

B. Air Quality Monitoring

The De Minimis analysis modeling results indicate that 24-hr PM_{10} exceeds the respective monitoring significance level and requires the gathering of ambient monitoring information.

The De Minimis analysis modeling results indicate that 24-hr SO_2, annual NO_2, and 8-hr CO are below their respective monitoring significance level.

Table 3. Modeling Results for PSD Monitoring Significance Levels

Pollutant	Averaging Time	GLCmax (µg/m^3)	Significance (µg/m^3)
SO_2	24-hr	4.5	13
PM_{10}	24-hr	10.1	10
NO_2	Annual	0.4	14
CO	8-hr	276	575

The GLCmax for all pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

Note the updated NO_x emission rates for the kiln (EPN 21-SK-230) are less than the representations made in the original modeling demonstration. The applicant did not update the NO_2 modeling for this demonstration. The annual NO_2 result reported above in Table 3 is conservative.

The applicant evaluated ambient $PM_{10\ and}$ $PM_{2.5}$ monitoring data to satisfy the requirements for the pre-application air quality analysis.

A background concentration for PM_{10} was obtained from the EPA AIRS monitor 481130050 located at 717 South Akard St. Dallas, Dallas County. The high, second high monitored concentration from 2020-2022 was used for the 24-hr value (82 µg/m^3). The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the

monitor site relative to the project site. The background concentration was also used in the NAAQS analysis.

Background concentrations for $PM_{2.5}$ were obtained from the EPA AIRS monitor 481210034 located at Denton Airport South, Denton, Denton County. The applicant calculated the three-year average (2020-2022) of the 98th percentile of the annual distribution of the 24-hr concentrations for the 24-hr value (20 µg/m^3). The applicant used a three-year average (2020-2022) of the annual concentrations for the annual value (7.5 µg/m^3). The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site. The background concentrations were also used in the NAAQS analysis.

Since the project has a net emissions increase of 100 tpy or more of VOC or NO_x, the applicant evaluated ambient O_3 monitoring data to satisfy the requirements for the pre-application air quality analysis.

The applicant identified the Pilot Point ozone monitor (EPA AQS 481211032) as a conservative monitor for the proposed project site location. The applicant further noted how the Pilot Point monitor is located within the Dallas-Fort Worth (DFW) ozone non-attainment area and summarized the 2020-2022 ozone design value for the monitor without further refinement. The ADMT has reviewed the ozone monitoring data for further refinement and this review is discussed below.

Initially, during the modeling protocol development, the applicant had proposed using the Greenville ozone monitor (EPA AQS 482311006) for the proposed project site location. The ADMT had commented that the proposed project site location is likely to be located downwind of the DFW ozone non-attainment area more often than the selected Greenville monitor, based on wind data, and it is likely that the Greenville monitor would not be representative of the proposed project site location for all wind directions and should not be exclusively used in the pre-application analysis.

The ADMT reviewed monitoring data from two additional ozone monitors to identify ozone concentrations during times when the proposed project site location could have been located downwind of the DFW ozone non-attainment area – the above-mentioned Pilot Point monitor and the Frisco monitor (EPA AQS 480850005). Collectively, the information from these two monitors, along with the Greenville monitor, gives a complete analysis for the proposed project site location.

The Pilot Point ozone monitor is located to the southwest of the proposed project site location. A sector was defined with an origin at the Pilot Point monitor and that covered the extent of the modeled receptor grid surrounding the proposed project site location. The sector was then used to identify wind directions favorable for transport towards the proposed project site location (220–265 degrees). Ozone data were reviewed during these wind directions for years 2020-2022 and the highest fourth highest daily maximum hourly value from all three years was 64 ppb. This would be a conservative metric for the ozone design value; the ozone design value is based on a three-year average of the fourth highest daily maximum rolling 8-hr average.

The Frisco ozone monitor is located to the south-southwest of the proposed project site location. Similar to the Pilot Point ozone monitor described above, a sector was defined with an origin at the Frisco monitor and that covered the extent of the modeled receptor grid surrounding the proposed project site location. The sector was then used to identify wind directions favorable for transport towards the proposed project site location (178–215

degrees). Ozone data were reviewed during these wind directions for years 2020-2022 and the highest fourth highest daily maximum rolling 8-hr average value from all three years was 69 ppb. This would be a conservative metric for the ozone design value; the ozone design value is based on a three-year average of the fourth highest daily maximum rolling 8-hr average.

The Greenville ozone monitor has an ozone design value of 63 ppb for the years 2020-2022.

C. National Ambient Air Quality Standards (NAAQS) Analysis

The De Minimis analysis modeling results indicate 1-hr SO_2, 24-hr and annual PM_{10}, 24-hr and annual $PM_{2.5}$, and 1-hr NO_2 exceed the respective de minimis concentration and require a full impacts analysis. The full NAAQS modeling results indicate the total predicted concentrations will not result in an exceedance of the NAAQS.

Table 4. Total Concentrations for PSD NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (µg/m³)	Background (µg/m³)	Total Conc. = [Background + GLCmax] (µg/m³)	Standard (µg/m³)
SO_2	1-hr	11	16	27	196
PM_{10}	24-hr	10	82	92	150
$PM_{2.5}$	24-hr	6	20	26	35
$PM_{2.5}$	Annual	1.3	7.5	8.8	9
NO_2	1-hr	87	see discussion below	87	188

The 1-hr SO_2 GLCmax is the highest five-year average of the 99th percentile of the annual distribution of predicted daily maximum 1-hr concentrations determined for each receptor.

The 24-hr PM_{10} GLCmax is the maximum predicted concentration over five years of meteorological data.

The 24-hr $PM_{2.5}$ GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted 24-hr concentrations determined for each receptor.

The annual $PM_{2.5}$ GLCmax is the maximum five-year average of the annual concentrations determined for each receptor.

The 1-hr NO_2 GLCmax is the highest five-year average of the 98th percentile of the annual distribution of predicted daily maximum 1-hr concentrations determined for each receptor.

Note the updated NO_x emission rates for the kiln (EPN 21-SK-230) are less than the representations made in the original modeling demonstration. The applicant did not update the NO_2 modeling for this demonstration. The 1-hr NO_2 result reported above in Table 4 is conservative.

A background concentration for SO_2 was obtained from the EPA AIRS monitor 481390016 located at 2725 Old Fort Worth Rd., Midlothian, Ellis County. A three-year average (2019-2021) of the 99th percentile of the annual distribution of daily maximum 1-hr concentrations was used for the 1-hr value. The applicant reviewed more recent monitoring data from EPA AIRS monitor 482570005 and determined the outcome of the analysis would not change. The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site.

A background concentration for NO_2 was obtained from the EPA AIRS monitor 481210034 located at Denton Airport South, Denton, Denton County. The applicant determined the 98th percentile of the annual distribution of the maximum 1-hr concentrations for each hour of the day (using data from 2020-2022), consistent with EPA guidance. These background values were then used in the model (as hourly background scalars) with the BACKGRND keyword to be combined with model predictions, giving a total predicted concentration. The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site.

As stated above, to evaluate secondary $PM_{2.5}$ impacts, the applicant provided an analysis based on a Tier 1 demonstration approach consistent with the EPA's GAQM. Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as MERPs. Using data associated with the 500 tpy Parker County source, the applicant estimated 24-hr and annual secondary $PM_{2.5}$ concentrations of 0.18949 µg/m^3 and 0.00231 µg/m^3, respectively. When these estimates are added to the GLCmax listed in Table 4 above, the results are less than the NAAQS.

D. Increment Analysis

The De Minimis analysis modeling results indicate that 24-hr and annual PM_{10} and 24-hr and annual $PM_{2.5}$ exceed the respective de minimis concentrations and require a PSD increment analysis.

Table 5. Results for PSD Increment Analysis

Pollutant	Averaging Time	GLCmax (µg/m^3)	Increment (µg/m^3)
PM_{10}	24-hr	29	30
PM_{10}	Annual	3	17
$PM_{2.5}$	24-hr	8.7	9
$PM_{2.5}$	Annual	1.4	4

The GLCmax for 24-hr $PM_{2.5}$ and 24-hr PM_{10} are the maximum high, second high (H2H) predicted concentrations across five years of meteorological data. The GLCmax for annual PM_{10} and $PM_{2.5}$ are the maximum predicted concentrations over five years of meteorological data.

The GLCmax for 24-hr and annual $PM_{2.5}$ reported in the table above represent the total predicted concentrations associated with modeling the direct $PM_{2.5}$ emissions and the

contributions associated with secondary $PM_{2.5}$ formation (discussed above in the NAAQS Analysis section).

E. Additional Impacts Analysis

The applicant performed an Additional Impacts Analysis as part of the PSD AQA. The applicant conducted a growth analysis and determined that population will not significantly increase as a result of the proposed project. The applicant conducted a soils and vegetation analysis and determined that all evaluated criteria pollutant concentrations are below their respective secondary NAAQS. The applicant meets the Class II visibility analysis requirement by complying with the opacity requirements of 30 TAC Chapter 111. The Additional Impacts Analyses are reasonable and possible adverse impacts from this project are not expected.

The ADMT evaluated predicted concentrations from the proposed project to determine if emissions could adversely affect a Class I area. The nearest Class I area, Wichita Mountains Wilderness, is located approximately 225 kilometers (km) from the proposed site.

The H_2SO_4 24-hr maximum predicted concentration of 7 µg/m^3 occurred approximately 243 meters from the property line towards the west. The H_2SO_4 24-hr maximum predicted concentration occurring at the edge of the receptor grid, 10.6 km from the proposed sources, in the direction of the Wichita Mountains Wilderness Class I area is 0.526 µg/m^3. The Wichita Mountains Wilderness Class I area is an additional 214.4 km from the edge of the receptor grid. Therefore, emissions of H_2SO_4 from the proposed project are not expected to adversely affect the Wichita Mountains Wilderness Class I area.

The predicted concentrations of PM_{10}, $PM_{2.5}$, NO_2, and SO_2 for all averaging times, are all less than de minimis levels at a distance of 7.3 km from the proposed sources in the direction of the Wichita Mountains Wilderness Class I area. The Wichita Mountains Wilderness Class I area is an additional 217.7 km from the location where the predicted concentrations of PM_{10}, $PM_{2.5}$, NO_2, and SO_2 for all averaging times are less than de minimis. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wilderness Class I area.

F. Minor Source NSR and Air Toxics Review

Table 6. Site-wide Modeling Results for State Property Line

Pollutant	Averaging Time	GLCmax (µg/m^3)	Standard (µg/m^3)
SO_2	1-hr	12	1021
H_2SO_4	1-hr	22	50
H_2SO_4	24-hr	7	15

Table 7. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLCmax (µg/m^3)	Background (µg/m^3)	Total Conc. = [Background + GLCmax] (µg/m^3)	Standard (µg/m^3)
Pb	3-mo	0.0001	0.02	0.0201	0.15

The 3-mo Pb GLCmax is based on the maximum monthly predicted concentration over a one-year period.

A background concentration for Pb was obtained from the EPA AIRS monitor 480850029 located at 7202 Stonebrook Parkway, Frisco, Collin County. The highest 3-month rolling average from 2020-2022 was used for the 3-month value. The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site.

Table 8. Minor NSR Site-wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLCmax (µg/m^3)	GLCmax Location	ESL (µg/m^3)
ammonia	7664-14-7	1-hr	17	Eastern Property Line	180
hydrogen chloride	7647-01-0	1-hr	0.3	--	190
hydrogen chloride	7647-01-0	Annual	0.01	--	7.9
mercury	7439-97-6	1-hr	0.0004	--	0.25
portland cement	65997-15-1	1-hr	53	Southern Property Line	50
portland cement	65997-15-1	Annual	1	15m N	5
silica, crystalline (quartz)	14808-60-7	1-hr	2	Northern Property Line	14
silica, crystalline (quartz)	14808-60-7	Annual	0.07	Southern Property Line	0.27

Table 9. Minor NSR Hours of Exceedance for Health Effects

Pollutant	Averaging Time	1 X ESL GLCni
portland cement	1-hr	1

The GLCmax locations are listed in Table 8 above by their approximate distance and direction from the property line of the project site. The GLCmax also represents the GLCni. The GLCmax locations for hydrogen chloride and mercury are not available since the applicant relied on generic modeling (see discussion below).

G. Greenhouse Gases

EPA has stated that unlike the criteria pollutants for which EPA has historically issued PSD permits, there is no National Ambient Air Quality Standard (NAAQS) for GHGs, including no PSD increment. The global climate-change inducing effects of GHG emissions, according to the “Endangerment and Cause or Contribute Finding”, are far-reaching and multi-dimensional (75 FR 66497). Climate change modeling and evaluations of risks and impacts are typically conducted for changes in emissions that are orders of magnitude larger than the emissions from individual projects that might be analyzed in PSD permit reviews. Quantifying the exact impacts attributable to a specific GHG source obtaining a permit in specific places and points would not be possible [EPA’s PSD and Title V Permitting Guidance for GHGs at 48]. Thus, EPA has concluded in other GHG PSD permitting actions it would not be meaningful to evaluate impacts of GHG emissions on a local community in the context of a single permit.

The TCEQ has determined that an air quality analysis would provide no meaningful data and has not required the applicant to perform one. As stated in the preamble to TCEQ’s adoption of the GHG PSD program, the impacts review for individual air contaminants will continue to be addressed, as applicable, in the state's traditional minor and major NSR permits program per 30 TAC Chapter 116.

VIII. Conclusion

As described above, the applicant has demonstrated that the project meets all applicable rules, regulations and requirements of the State of Texas and the Federal Clean Air Act. The Executive Director’s preliminary determination is that the permits should be issued.

TCEQ AIR QUALITY PERMIT NUMBERS 167047, GHGPSDTX212, and PSDTX1602

APPLICATION BY	§	BEFORE THE
BM DORCHESTER LLC	§	
PORTLAND CEMENT PLANT	§	TEXAS COMMISSION ON
DORCHESTER, GRAYSON COUNTY	§	ENVIRONMENTAL QUALITY

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT

The Executive Director of the Texas Commission on Environmental Quality (the commission or TCEQ) files this Response to Public Comment (Response) on the New Source Review Authorization application and Executive Director's preliminary decision.

As required by Title 30 Texas Administrative Code (TAC) § 55.156, before an application is approved, the Executive Director prepares a response to all timely, relevant and material, or significant comments. The Office of Chief Clerk received timely comments from the following persons: Senator Drew Springer, Representative Reggie Smith, Karla McDonald (Mayor of Howe), Clint Catching and Kevin Wilson (on behalf of the Howe Independent School District Board of Trustees), David Smith (Mayor of Dorchester, on behalf of the City Council of the City of Dorchester), Adam Cernero Meghan Cone, and Brad Morgan (on behalf of the Sherman Independent School District [ISD] Board of Trustees), Duncan C. Norton (on behalf of Grayson County, the Cities of Sherman and Dorchester, and the Sherman Economic Development Corporation "SEDCO"), Jim Schermbeck (on behalf of Downwinders at Risk), Cynthia J. Kaleri (on behalf of the Environmental Protection Agency [EPA] Region 6), Group A *(See* Appendix A), Group B *(See* Appendix A), and individual commentors (*See* Appendix B). This Response addresses all timely public comments received, whether or not withdrawn. If you need more information about this permit application or the permitting process, please call the TCEQ Public Education Program at 1-800-687-4040. General information about the TCEQ can be found at our website at www.tceq.texas.gov.

BACKGROUND

Description of Facility

BM Dorchester LLC (Applicant) has applied to the TCEQ for a New Source Review Authorization under Texas Clean Air Act (TCAA) § 382.0518. This will authorize the construction of a new facility that may emit air contaminants.

This permit will authorize the Applicant to construct a Portland Cement Plant. The plant is to be located following the following driving directions: from the intersection of Highway 289 and Highway 902 east of Dorchester head east on Highway 902 for approximately 0.80 miles - the site will be located directly north of Highway 902 after the intersection of Taylor Road, Dorchester, Grayson County, Texas 75459. Contaminants authorized under this permit include carbon monoxide, hazardous air pollutants, sulfuric acid, nitrogen oxides, organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, greenhouse gases, lead, and sulfur dioxide. The proposed facility will also emit greenhouse gases.

Procedural Background

Before work is begun on the construction of a new facility that may emit air contaminants, the person planning the construction must obtain a permit from the commission. This permit application is for an initial issuance of Air Quality Permit Number 167047, GHGPSDTX212, and PSDTX1602.

The permit application was received on November 8, 2021, and declared administratively complete on November 18, 2021. The Notice of Receipt and Intent to Obtain an Air Quality Permit (NORI, first public notice) for this permit application was published in English on December 19, 2021, in the *Herald Democrat*. The Notice of Application and Preliminary Decision for an Air Quality Permit (NAPD, second public notice) was published on February 22, 2024, in English in the *Herald Democrat.* A Consolidated Notice of Receipt of Application and Intent to Obtain Permit and Notice of Application and Preliminary Decision (Consolidated NORI and NAPD, third public notice) was published in English on July 9, 2024, in the *Herald Democrat* and in Spanish on July 9, 2024, in *La Prensa.* A public meeting was held on March 25, 2024, at 7:00 PM at the Hilton Garden Inn Denison/Sherman/At Texoma Event Center, 5015 South U.S. 75, Denison, Texas 75020. The notice of public meeting was mailed on February 9, 2024, and an amended notice of public meeting was mailed on February 13, 2024. The public comment period ended on August 8, 2024. Because this application was received after September 1, 2015, it is subject to the procedural requirements of and rules implementing Senate Bill 709 (84th Legislature, 2015).

COMMENTS AND RESPONSES

COMMENT 1: Health Effects / Air Quality / Cumulative and Additive Effects

Commenters expressed concern about the effect of the emissions from the proposed project on the air quality and health of people, particularly sensitive populations such as the elderly, children, and people with existing medical conditions. Commenters stated that they or members of their family have preexisting health conditions that would make them more susceptible to adverse health effects from the plant's emissions. Commenters are concerned that the emissions proposed to be authorized may cause or exacerbate health conditions, including but not limited to allergies, rheumatoid arthritis, psoriatic arthritis, asthma, heart attacks, autism, cancer, heart conditions, Chronic Obstructive Pulmonary Disease (COPD), organ damage, diabetes, lung disease, autoimmune diseases, pulmonary embolisms, emphysema, pulmonary fibrosis, cystic fibrosis, respiratory illnesses, reproductive issues, skin and eye issues, black lung, osteoarthritis, high blood pressure, respiratory problems, ear problems, Post Traumatic Stress Disorder (PTSD), sarcoidosis, silicosis, sinusitis, strokes, tachycardia, thyroid issues, and vitiligo. Commenters are concerned that children will be exposed to contaminants during outdoor activities or that they will not be able to go outside. Commenters expressed concern regarding emissions of crystalline silica, heavy metals, and toxic chemicals such as dioxins, furans, mercury, polychlorinated biphenyls (BCP's), benzopyrene (BAP), and polyaromatic hydrocarbons (PAH's). Commenters expressed concern that the project would cause odor nuisances. Commenters expressed concern the proposed facility will contribute to ozone, global warming, and climate change. Commenters are concerned that the Applicant is trying

to obtain a permit before the new EPA standards are passed. Jim Schermbeck expressed concern that air quality standards are outdated. Rex Glendenning expressed concern regarding radioactive emissions. Deirdre Diamond expressed concern regarding cumulative effects, asking that the impact analysis take into consideration emissions from existing Concrete Batch Plants in the area as well as applications that are still in the permitting process. Ronald Vanbuskirk expressed concern that the proposed project would cause smelt and smog-filled air. Duncan C. Norton expressed concern that the site will not comply with the National Ambient Air Quality Standards (NAAQS) or the National Emission Standards for Hazardous Air Pollutants (NESHAP). Jeremy Devore expressed concern that the permit would cause nonattainment status. Michael Fannin wants to know the carbon footprint of the proposed plant.

EPA Consideration

Cynthia J. Kaleri expressed appreciation for TCEQ's consideration of the EPA's early concerns regarding the representativeness of the monitored background concentrations and the emissions estimates utilized in the ozone MERPs analysis and strongly encourages the TCEQ to thoroughly review and notify the EPA of any such proposal to relax the most recent proposed emission representations or averaging periods associated with limit compliance.

(Group A, Novin Abdi, Silvia Adams, Randy Adams, Janice Akins, Samantha Allison, Luz Arce, Amber Armendariz, Ralph H. Armstrong, Katrina Lynn Arsenault, Art Arthur, Charles Ashley, Amy Ashlock, Andrea Paulette Aslam, Sesily Babekuhl, Cynthia Baker, Willies Carl Ballou, Douglas Glenn Banner, Kelly Denise Barnes, Darla Barr, Robert Bauer, Heather Beaver, Nelson Beaver, Ashley Beck, Francis Beck, Patti Beggs, Deanna Bell, Lander Bethel, Tonya Bingham, Liz Birchall, Cliff Blackstock, Ashley Blanton, Tammy Bohannon-Yule, Nancy Bond, Nolan E. Bond, Linda Bowers, Amber Bratt, Kristopher Daniel Bravo, Virginia Brawley, Ashlin Bridwell, Cheryl Brociek, Ron Brockner, Emily Brooks, Jan Broomall, Lafefel Brown, Nancy Brown, Jeffrey Brown, Tiffany Broyles, Jeremiah D. Broyles, Erika Bryan, Jamie Buckalew, Homer Bullard, Jennifer Bullard, Brenna Butler, Christa Call, Veronica Calzada, Sarah Campbell, Tommy Joe Carney, Holly Castleberry, Clint Catching, Cary Catching, Shane Cavender, Adam Cernero, Nicole Chambers, Bobby Luke Chandler, Kristin Chandler, Bobby Chandler, Megan C. Chandler, Art Clayton, Robert Clough, Steve Thomas Cohea, Margaret Coleman, Lee Collins, Karla K. Colwell, Meghan Cone, Charli Cotten, R. D. Cozad, Skyler Cozad, Traber Cozad, Camryn Craddock, Cassady A. Craddock, Matthew Crain, Amanda Crawford, Andrew Crawford, James Crews, Melissa Gail Croney, Brian Culp, Donald Ray Cummings, Karen L. Cummings, Karen Cummings, Lindsay Cummings, Kristen Cunningham, Tracy R. Curry, Atul Dave, Angela Davidson, Wes Davidson, Chanel Ann Davis, Cynthia L. Davis, Alicia Davis, Karla Graham Davis, Bruce Dawsey, Bruce W. Dawsey, Shawna Dawson, Heidi Debner, Thomas G. Debner, Rebecca Demel, Jeremy Devore, Jeremy W. Devore, Jeremy Q. Devore, Mary Gail Devore, Jeremy W. Devore, Bethany Devore, Deirdre Diamond, Joanne Dickey, Melissa Doan, Kimberly Stewart Dodson, Kathleen Dophied, Judy Searcy Dryden, Robert E. Dryden, Judith S. Dryden, Searcy Dryden, Leslie M Dulack, Michael Dulack, Christina N. Dunlap, Sherry Duran, Cindy Durrant, Michael Joseph Elliott, Mark L. England, William Engle, Cendy Y. Escalera, Nayeli Escalera-Solis, Rachel Evans, Michael Fannin, Jeremiah Broyles (on behalf of First Class North Texas [FCNT]), Courtney Fierro, Laura Fincher, Lisa Flaggert,

Lisa Marie Flaggert, James N. Flanery, Adam Fleming, Lindsey Flores, Harold Foster, William Foster, Frank Edward Gadek, Andrea Ganow, Chris Gardner, Lori Gardner, Renny Gehman, Rex Glendenning, Rosa Goodenow, Lora Gordon, Anabelle Graham, Misty Gray, Laura Green, Linda J. Greenfield, Austin Grooms, Brandon Grooms, Rachel Grooms, Joshua Grooms, Richard Oran Gross, Jennifer Haeg, Teresa M. Hall, Damon L. Moore Hall, Ginger Ham, Dave Hammond, Matt Hardenburg, Letitia Harris, Amy Hartel, Christine Heck, Patricia Hedrick, Moses Hejny, Lisa Hejny, Sarah Henry, Joann Hensley, Alyssa Hernanadez, Katerina Hess, Jerry Dean Hestand, Debbie Hester, Dwayne Hicks, Michael S. Hignight, Carol Hill, Melissa Hill, Melinda Hill, Amy Hoffman-Shehan, Suzanne Hooks, Charity Horne, Robin A. Horner, Scott Horner, Helen Horton, Sherry Howard, Jen Huff, Alice Hughes, Meghan Hughes, Mandy Hummel, Laura T. Hunt, Lori Huntsman, Debbie Hurd, Billie Charels Ingram, Heather Jacques, Phyllis D. James, Michael Jefferson, Rachel Jenkins, Chris Jennings, Suzanna Dryden Jensen, Brandon Johnson, Liberty Johnson, Linda Kay Johnson, Lori Jones, Debbie Elaine Judkins, Carl Kalbfleisch, Cynthia J. Kaleri, Mary Karam, Kenyon Kemp, Dina Kenemore, Brittany Kennedy, James Kimbrel, Ken King, Laura L. King, Geri V. King, Cody M. King, Laura Kirilloff, Debbie Kirkpatrick, Keith Kisselle, Anthony J. Kordosky, Cindy Kvaal, Rick Kvaal, Greg L. Laird, Austin Lambert, Benjamin T. Landgraf, Chris Landino, William Landrum, Terri Langford, Julie Lanicek, Jason R. Lankford, Jason Lankford, Patrick Latona, Val Lauerhahs, Rhonda Lawson, Wayne Lee, James Lewellen, Kylee Likarish, Victor Lissiak, Paul Daniel Lopez, Trudy Lucas, Jim Lucas, Eric Lunde, Shelley Luther, Ronald Clay Lynch, Dakotah Mahan, Brian Mai, Sarah Mallory, Rickey J. Malta, Casey Mandi, Rose M. Marr, Michael Gene Marsh, Mickie Martin, Brittany Martin, George Mason, Catherine Matuella, Patsy Mauldin, Dusty Wayne Mayer, William Mayer, Traci McCarthy, Claudia L. McClure, Kathleen McClure, Les McConnell, Garrett McCown, Vivian Robin McCoy, Karla McDonald, Larry McDonald, Toya McEwen, Lauren McNutt, Patrick Neal McNutt, Kevin Meissner, Amy Meyer, Davida Miorin, Cindy Mitchell, Michael J. Mitchusson, Lynn M. Mitchusson, Mehrdad Moayedi, Joyce L. Moore, Grover Franklin Moore, Angela Moreau, Brad Morgan, Mary Morgan, Jason Morin, Shandi Morris, Amarise Morris, Andronica Morris, Matthew Morris, Zadrian Morris, Terry Morrison, Marthann Morrow, Ashley Morrow, Karen Murphy, Lucy Myer, Rick Myer, Jason Lee Naramor, Mitaj Nathwani, Sharon Nelson, Jacob Nelson, Andeelea Anderson Nichols, Danny Thomas Nichols, Chris Nicoloff, Marie Nixon, Paul Nixon, Rose Marie Nixon, Brandon Norris, Jennifer Norris, Brian E. Norris, Tera Norris, Erica Northrup, Duncan C. Norton, Brent Omdahl, Brent E. Omdahl, Angie Onley, Bonita L. Overbey, Jeff Overstreet, Jeffrey Tyler Overstreet, Paula Overstreet, Nikolaus Owen, Martha Paben, James Parrish, Angela Patton, Melisa Patzer, Holland Paula, Debra Payne, Jose Fernando Pena, Jody Perry, Emily Powell, Taylor P. Powell, Lindsay Price, Joshua D. Price, Delfina Prisock, Chelsey Pulcheon, Kathy Raner, Justin Neal Raner, Alan Redd, Patsy A. Reeves, Laura Reeves, Richard Reeves, J. Renfro, Kevin Diaz Reyes, Tara Rice, Cindy Risk, Naif Risk, Mary Roberts, Kylynn Robinson, Douglas Ray Robison, Judy Carol Robison, Luanne Robison, Mark Douglas Robison, Brad Robnett, Mona Robnett, Liz Rocamontes, Elizabeth Rodriguez, Jennifer Rollins, Sharla Ross, Kara Royston, Brad Rucker, Kayli Rushing, Bettye Russell, Brian Russell, Linda Russell, Linda Sue Russell, Russell Rutherford, Christina R. Rykens, Carrie Saindon, Jim Schermbeck, Jarod Schmitt, Joann Schnitker, Bradley J. Schnitker, Mary J. Scott, Betty Scott, Racheal Sedmack, Doreen Shacklee, True Shaw, Rosa Shelton, Gary Shields, Kenda Sinclair, Sharon Slaughter, David Smith, Reggie Smith, Wendy Smith, Derek Smith, Kyle Smith, Dustin Smith, Leann Smith, Jeff Randall Spencer, Julia Spencer, Frances Sprabary, Drew Springer, Sara

Sprinkle, Kristy Stachmus, Penny Stahl, Roxanne Standerfer, James Stewart, Robert Stewart, Shirley Stewart, Alice Stewart, Alice Faye Stewart, Chandler Strawn, James Stringfield, Dana Strong, Crystal Stueve, Sathappun Subbiah, James Sutherland, Kenneth Svehlak, Sue Svehlak, Meghan Swindle, Griffin Tammy, Betty Jean Taylor, Thomas L. Taylor, Thomas Leland Taylor, Shawn C. Teamann, Cristi Tenant, Alyssa Thomas, Dana Thornhill, Julie Travis, Yolanda Trevino, Tonya Troxtell, Griffin Underwood, Kristi Utley, Diana Vanbuskirk, Ronald Vanbuskirk, Mickinze Vanherpen, Denise Vawter, Marilyn Sue Vest, Becky Vincent, Larry W. Vincent, Kimberly Vodry, Mark Vodry, Jenny Vonbehren, Jaymison Bella Voto, Campbell Voto, Jay Dee Voto, Jay Voto, Leonard G. Waldrum, Paula Walker, Phillip Walker, Bihfang Wang, Brian Wang, John Ward, Cameryn P. Warren, Kevin Wasp, Jacqueline Wassom, Manual Watson, Shelbie Watts, Lanisha Weaver, Rudy Weems, Cynthia Weems, Cynthia L. Weems, Casey Weinmann, Monique Whaley, Steve Whaley, Amy Wheeler, Joseph White, Jennifer White, Edward Whitfield, Monica L. Whitfield, Jeff Whitmire, Carolyn Wildman, Teresa Wildman, Gabriel Williams, Ruth E. N. Cox Williamson, Jennifer Williamson, Jeffrey Wilmoth, Kevin Wilson, Dustin Ray Wilson, Krista Lucas Wynn, Angela Zarallo, Rebecca Zey, Savanna Zinn, Tracie Zweifel-Gibson, Angela Wilson , Cynthia Zinn , David G. Sileven , Dorothy Schmoker , Gary Schnitker , Lainie Ramsay , Nancy Jan Shaw , Paula Neely , Robin Sears , Shayla Wheeler, Pat Piaschyk, Angela Onley, Borming Wang, Kenneth J. King, Elizabeth Rocamontes)

RESPONSE 1: The Executive Director is required to review permit applications to ensure they will be protective of human health and the environment. For this type of air permit application, potential impacts to human health and welfare or the environment are determined by comparing the Applicant's proposed air emissions to appropriate state and federal standards and guidelines. These standards and guidelines include the NAAQS, TCEQ Effects Screening Levels (ESLs), and TCEQ rules. As described in detail below, the Executive Director determined that the emissions authorized by this permit are protective of both human health and welfare and the environment.

NAAQS

The U.S. Environmental Protection Agency (EPA) created and continues to evaluate the NAAQS, which include both primary and secondary standards, for pollutants considered harmful to public health and the environment.[1] Primary standards protect public health, including sensitive members of the population such as children, the elderly, and those individuals with preexisting health conditions. Secondary NAAQS protect public welfare and the environment, including animals, crops, vegetation, visibility, and buildings, from any known or anticipated adverse effects from air contaminants. The EPA has set NAAQS for criteria pollutants, which include carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone (O_3), sulfur dioxide (SO_2), particulate matter less than or equal to 10 microns in aerodynamic diameter (PM_{10}), and PM less than or equal to 2.5 microns in aerodynamic diameter ($PM_{2.5}$).

[1] 40 CFR 50.2

The likelihood of whether adverse health effects caused by emissions from the facility could occur in members of the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions or other preexisting conditions, was determined by comparing the facility's maximum predicted air dispersion modeling concentrations to the relevant state and federal standards and ESLs. TCEQ staff used modeling results to verify that predicted ground-level concentrations from the proposed facility are not likely to adversely impact public health and welfare. The overall evaluation process provides a conservative prediction that is protective of public health. The modeling predictions were reviewed by the TCEQ Air Dispersion Modeling Team, and the modeling analysis was determined to be acceptable. The Applicant used the American Meteorological Society (AMS)/EPA Regulatory Model (AERMOD) modeling system to provide a reasonable worst-case representation of potential impacts from the proposed emissions on the area surrounding the facility. *See* Response 2 for additional information concerning the modeling and Response 12 concerning emissions calculations.

The Applicant conducted a NAAQS analysis for NO_2, CO, SO_2, PM_{10}, $PM_{2.5}$, Pb, and O_3. The first step of the NAAQS analysis is to compare the proposed modeled emissions against the established de minimis level. Predicted concentrations (GLC_{max}[2]) below the de minimis level are considered to be so low that they do not require further NAAQS analysis. Table 1 contains the results of the de minimis analysis.

Table 1. Modeling Results for PSD De Minimis Analysis in Micrograms per Cubic Meter (µg/m³)

Pollutant	Averaging Time	GLC_{max} (µg/m³)	De Minimis (µg/m³)
NO_2	1-hr	19	7.5
NO_2	Annual	0.4	1
CO	1-hr	769	2000
CO	8-hr	276	500
PM_{10}	24-hr	10	5
PM_{10}	Annual	3	1
$PM_{2.5}$ (NAAQS)	24-hr	7.2	1.2
$PM_{2.5}$ (NAAAQS)	Annual	1.3	0.13
$PM_{2.5}$ (Increment)	24-hr	8.7	1.2
$PM_{2.5}$ (Increment)	Annual	1.4	0.13
SO_2	1-hr	12	7.8
SO_2	3-hr	12	25
SO_2	24-hr	4.5	5
SO_2	Annual	0.3	1

The pollutants below the de minimis level should not cause or contribute to a violation of the NAAQS and are protective of human health and the environment.

[2] The GLC_{max} is the maximum ground level concentration predicted by the modeling.

The Applicant conducted a full NAAQS analysis (PSD NAAQS and Minor NSR NAAQS) for those pollutants above de minimis to account for cumulative effects by including an evaluation of all on-property sources, applicable off-property sources, and representative monitored background concentrations. The de minimis analysis modeling results indicate 1-hr SO_2, 24-hr and annual PM_{10}, 24-hr and annual $PM_{2.5}$, and 1-hr NO_2 exceed the respective de minimis concentration and require a full impacts analysis. Results of the NAAQS analysis are presented below in Table 2 and Table 3 below.

The total concentration was determined by adding the GLC_{max} to the appropriate background concentration. Background concentrations are obtained from ambient air monitors across the state and are added to the modeled concentration (both on-property and off-property sources) to account for sources not explicitly modeled. The ambient air monitors were selected to ensure that they are representative of the proposed site. The total concentration was then compared to the NAAQS to ensure that the concentration is below the standard. For any subsequent projects submitted pertaining to this or any other facility in the area, the air quality analysis for that project will have to include the emissions authorized by this project, as well as other applicable off-property sources, if a full impacts analysis is required.

Table 2. Total Concentrations for PSD NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLC_{max} ($\mu g/m^3$)	Background ($\mu g/m^3$)	Total Conc. = [Background + GLC_{max}] ($\mu g/m^3$)	Standard ($\mu g/m^3$)
SO_2	1-hr	11	16	27	196
PM_{10}	24-hr	10	82	92	150
$PM_{2.5}$	24-hr	6	20	26	35
$PM_{2.5}$	Annual	1.3	7.5	8.8	9
NO_2	1-hr	87	See discussion*	87	188

* A background concentration for NO_2 was obtained from the EPA AIRS monitor 481210034 located at Denton Airport South, Denton, Denton County. The Applicant determined the 98th percentile of the annual distribution of the maximum 1-hr concentrations for each hour of the day (using data from 2020-2022), consistent with EPA guidance. These background values were then used in the model (as hourly background scalars) to be combined with model predictions, giving a total predicted concentration. The use of the monitor was determined to be reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site.

Table 3. Total Concentrations for Minor NSR NAAQS (Concentrations > De Minimis)

Pollutant	Averaging Time	GLC_{max} ($\mu g/m^3$)	Background ($\mu g/m^3$)	Total Conc. = [Background + GLC_{max}] ($\mu g/m^3$)	Standard ($\mu g/m^3$)
Pb	3-mo	0.0001	0.02	0.0201	0.15

The NAAQS analysis results are below the standard for each pollutant, should not cause or contribute to violation of the NAAQS, and are protective of human health and the environment.

Air Quality Monitoring

The de minimis analysis modeling results indicate that 24-hr PM_{10} exceeds the respective monitoring significance level and requires the gathering of ambient monitoring information. Additionally, the de minimis analysis modeling results indicate that 24-hr SO_2, annual NO_2, and 8-hr CO are below their respective monitoring significance level, as Shown in Table 4 below.

Table 4. Modeling Results for PSD Monitoring Significance Levels

Pollutant	Averaging Time	GLC_{max} (µg/m³)	Significance (µg/m³)
SO_2	24-hr	4.5	13
PM_{10}	24-hr	10.1	10
NO_2	Annual	0.4	14
CO	8-hr	276	575

The GLC_{max} for all pollutants and averaging times represent the maximum predicted concentrations over five years of meteorological data.

The updated NO_x emission rates for the kiln (EPN 21-SK-230) are less than the representations made in the original modeling demonstration. The applicant did not update the NO_2 modeling for this demonstration. The annual NO_2 result reported above in Table 3 is conservative.

The applicant evaluated ambient PM_{10} and $PM_{2.5}$ monitoring data to satisfy the requirements for the pre-application air quality analysis. A background concentration for PM_{10} was obtained from the EPA AIRS monitor 481130050 located at 717 South Akard St. Dallas, Dallas County. The high, second high monitored concentration from 2020-2022 was used for the 24-hr value (82 µg/m³). The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site. The background concentration was also used in the NAAQS analysis.

Background concentrations for $PM_{2.5}$ were obtained from the EPA AIRS monitor 481210034 located at Denton Airport South, Denton, Denton County. The applicant calculated the three-year average (2020-2022) of the 98th percentile of the annual distribution of the 24-hr concentrations for the 24-hr value (20 µg/m³). The applicant used a three-year average (2020-2022) of the annual concentrations for the annual value (7.5 µg/m³). The use of the monitor is reasonable based on the applicant's review of land use, county population, county emissions, and a quantitative review of emissions surrounding the area of the monitor site relative to the project site. The background concentrations were also used in the NAAQS analysis.

Since the project has a net emissions increase of 100 tpy or more of VOC or NO_x, the applicant evaluated ambient O_3 monitoring data to satisfy the requirements for the pre-application air quality analysis. The applicant identified the Pilot Point ozone monitor (EPA AQS 481211032) as a conservative monitor for the proposed project site location. The applicant further noted how the Pilot Point monitor is located within the Dallas-Fort Worth (DFW) ozone non-attainment area and summarized the 2020-2022 ozone design value for the monitor without further refinement. The Air Dispersion Modeling Team (ADMT) has reviewed the ozone monitoring data for further refinement and this review is discussed below.

Initially, during the modeling protocol development, the applicant had proposed using the Greenville ozone monitor (EPA AQS 482311006) for the proposed project site location. The ADMT had commented that the proposed project site location is likely to be located downwind of the DFW ozone non-attainment area more often than the selected Greenville monitor, based on wind data, and it is likely that the Greenville monitor would not be representative of the proposed project site location for all wind directions and should not be exclusively used in the pre-application analysis.

The ADMT reviewed monitoring data from two additional ozone monitors to identify ozone concentrations during times when the proposed project site location could have been located downwind of the DFW ozone non-attainment area – the above-mentioned Pilot Point monitor and the Frisco monitor (EPA AQS 480850005). Collectively, the information from these two monitors, along with the Greenville monitor, gives a complete analysis for the proposed project site location.

The Pilot Point ozone monitor is located to the southwest of the proposed project site location. A sector was defined with an origin at the Pilot Point monitor and that covered the extent of the modeled receptor grid surrounding the proposed project site location. The sector was then used to identify wind directions favorable for transport towards the proposed project site location (220–265 degrees). Ozone data were reviewed during these wind directions for years 2020-2022 and the highest fourth highest daily maximum hourly value from all three years was 64 ppb. This would be a conservative metric for the ozone design value; the ozone design value is based on a three-year average of the fourth highest daily maximum rolling 8-hr average.

The Frisco ozone monitor is located to the south-southwest of the proposed project site location. Similar to the Pilot Point ozone monitor described above, a sector was defined with an origin at the Frisco monitor and that covered the extent of the modeled receptor grid surrounding the proposed project site location. The sector was then used to identify wind directions favorable for transport towards the proposed project site location (178–215 degrees). Ozone data were reviewed during these wind directions for years 2020-2022 and the highest fourth highest daily maximum rolling 8-hr average value from all three years was 69 ppb. This would be a conservative metric for the ozone design value; the ozone design value is based on a three-year average of the fourth highest daily maximum rolling 8-hr average.

The Greenville ozone monitor has an ozone design value of 63 ppb for the years 2020-2022.

PSD Increment Analysis

The PSD program limits the extent to which air quality may be allowed to deteriorate in areas where pollutant concentrations are below the NAAQS (attainment areas). Increases in pollutant concentrations over the background are limited to certain increments, which are values specified by EPA at 40 CFR § 52.21(c). When the de minimis analysis modeling indicates that a criteria pollutant exceeds its respective de minimis concentration, a PSD increment analysis is necessary for those criteria pollutants for which EPA has established an increment. The de minimis analysis modeling results indicate that 24-hour and annual PM_{10} and 24-hour and annual $PM_{2.5}$ exceed the respective de minimis concentrations and require a PSD increment analysis. The results of the PSD Increment Analysis are shown in Table 5 below.

Table 5. Results for PSD Increment Analysis

Pollutant	Averaging Time	GLC_{max} (µg/m³)	Increment (µg/m³)
PM_{10}	24-hr	29	30
PM_{10}	Annual	3	17
$PM_{2.5}$	24-hr	8.7	9
$PM_{2.5}$	Annual	1.4	4

Ozone Analysis

The Applicant performed an O_3 analysis as part of the PSD Air Quality Analysis (AQA). The Applicant evaluated project emissions of O_3 precursor emissions (NO_x and VOC) based on a Tier 1 demonstration approach consistent with the EPA's Guideline on Air Quality Models (GAQM). Specifically, the applicant used a Tier 1 demonstration tool developed by the EPA referred to as Modeled Emission Rates for Precursors (MERPs). Using data associated with the worst-case source for NO_x and VOC, the applicant estimated an 8-hr O_3 concentration of 0.99718 ppb. When the estimates of ozone concentrations from the project emissions are added together, the results are less than the de minimis level, as shown in Table 6 below.

Table 6. Modeling Results for Ozone PSD De Minimis Analysis in Parts per Billion (ppb)

Pollutant	Averaging Time	GLC_{max} (ppb)	De Minimis (ppb)
O_3	8-hr	0.997	1

Additional Impact Analysis

The Applicant performed an Additional Impacts Analysis as part of the PSD AQA. The applicant conducted a growth analysis and determined that population will not significantly increase as a result of the proposed project. The applicant conducted a soils and vegetation analysis and determined that all evaluated criteria pollutant concentrations are below their respective secondary NAAQS. The applicant meets the Class II visibility analysis requirement by complying with the opacity requirements of 30 TAC Chapter 111. The Additional Impacts Analyses are reasonable and possible adverse impacts from this project are not expected.

The ADMT evaluated predicted concentrations from the proposed project to determine if emissions could adversely affect a Class I area. The nearest Class I area, Wichita Mountains Wilderness, is located approximately 225 kilometers (km) from the proposed site.

The H_2SO_4 24-hr maximum predicted concentration of 7 μg/m^3 occurred approximately 243 meters from the property line towards the west. The H_2SO_4 24-hr maximum predicted concentration occurring at the edge of the receptor grid, 10.6 km from the proposed sources, in the direction of the Wichita Mountains Wilderness Class I area, is 0.526 μg/m^3. The Wichita Mountains Wilderness Class I area is an additional 214.4 km from the edge of the receptor grid. Therefore, emissions of H_2SO_4 from the proposed project are not expected to adversely affect the Wichita Mountains Wilderness Class I area.

The predicted concentrations of PM_{10}, $PM_{2.5}$, NO_2, and SO_2 for all averaging times, are all less than de minimis levels at a distance of 7.3 km from the proposed sources in the direction of the Wichita Mountains Wilderness Class I area. The Wichita Mountains Wilderness Class I area is an additional 217.7 km from the location where the predicted concentrations of PM_{10}, $PM_{2.5}$, NO_2, and SO_2 for all averaging times are less than de minimis. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wilderness Class I area.

Effects Screening Levels (ESLs) – Health Effects Analysis

To evaluate potential impacts of non-criteria pollutants, a health effects analysis was performed. ESLs are specific guideline concentrations used in TCEQ's evaluation of certain non-criteria pollutants. These guidelines are derived by the TCEQ's Toxicology Division and are based on a pollutant's potential to cause adverse health effects, odor nuisances, and effects on vegetation. Health-based ESLs are set below levels reported to produce adverse health effects, and are set to protect the general public, including sensitive subgroups such as children, the elderly, or people with existing respiratory conditions. The TCEQ's Toxicology Division specifically considers the possibility of cumulative and aggregate exposure when developing the ESL values that are used in air permitting, creating an additional margin of safety that accounts for potential cumulative and aggregate impacts. Adverse health or welfare effects are not expected to occur if the air concentration of a pollutant is below its respective ESL. If an air concentration of a pollutant is above the screening level, it is not necessarily indicative that an adverse effect will occur, but rather that further evaluation is warranted.

The health effects analysis is performed using the TCEQ guidance Air Permit Reviewer Reference Guide – APDG 5874 - Modeling and Effects Review Applicability (MERA) process.[3] The MERA is a step-by-step process to evaluate the potential impacts of non-criteria pollutants which are evaluated against the ESL for each chemical species. The initial steps are simple and conservative, and as the review progresses through the process, the steps require more detail and result in a more refined analysis. If the contaminant meets the criteria of a step, the review of human health and welfare effects for that

[3] *See* APDG 5874 guidance document.

chemical species is complete and is said to "fall out" of the MERA process at that step because it is protective of human health and welfare. Any non-criteria pollutants proposed to be authorized which were below their respective ESLs are considered to have satisfied the MERA criteria and would not be expected to cause adverse health effects. As described above, if an air concentration of a pollutant is above the ESL, it is not indicative of an adverse effect but rather that further evaluation is warranted.

The potential for odor nuisance is reviewed through the use of ESLs. All pollutants, except for those identified in Table 7 below satisfy the MERA criteria and therefore are not expected to cause adverse health effects. The pollutants identified in Table 7 did not meet the criteria of the MERA guidance document and required further analysis.

Table 7. Minor NSR Site-wide Modeling Results for Health Effects

Pollutant	CAS#	Averaging Time	GLC_{max} ($\mu g/m^3$)	GLC_{max} Location	ESL ($\mu g/m^3$)
ammonia	7664-14-7	1-hr	17	Eastern Property Line	180
hydrogen chloride	7647-01-0	1-hr	0.3	--	190
hydrogen chloride	7647-01-0	Annual	0.01	--	7.9
mercury	7439-97-6	1-hr	0.0004	--	0.25
portland cement	65997-15-1	1-hr	53	Southern Property Line	50
portland cement	65997-15-1	Annual	1	15m N	5
silica, crystalline (quartz)	14808-60-7	1-hr	2	Northern Property Line	14
silica, crystalline (quartz)	14808-60-7	Annual	0.07	Southern Property Line	0.27

Site-wide modeling was performed and demonstrated that all predicted concentrations except for 1-hour portland cement will not exceed the ESL. The TCEQ Toxicology Division conducted an analysis for 1-hour portland cement, which was the only pollutant with a predicted concentration above its ESL. The TCEQ Toxicology Division evaluated potential exposures and assessed human health risks to the public. Modeling predicts that the short-term GLC_{max}/ni for routine emissions of Portland cement will exceed its short-term ESL of 50 µg/m3 by 1.1 times, with a predicted corresponding frequency of one-times ESL exceedance at the GLC_{max}/ni of 1 hour per year. However, the modeled long-term GLC_{max}/ni for Portland cement was far below its annual ESL of 5 $\mu g/m^3$. Therefore, considering the magnitude and frequencies of the short-term ESL exceedances at the GLC_{max}/ni, the conservative nature of the modeling assumptions using worst-case scenarios and meteorological conditions, public exposure is unlikely at this site, and the fact that the long-term ESL was never exceeded at any receptors, the predicted short- and long-term emissions of portland cement are allowable. In conclusion, based on the modeled representations presented, the Toxicology Division determined no short- or long-term adverse health effects are expected to occur among the general public as a result of exposure to the proposed emissions from this facility.

Therefore, the Toxicology Division determined that the described impacts are acceptable given the conservative nature of both the ESLs and the emissions estimates. Additionally, these original estimates were rendered irrelevant by the revisions later submitted by the applicant, because the dust collector efficiency was doubled, providing filters which are twice as effective in terms of efficiency. This more than halved the emissions from the dust collectors (all sources which handle cement exhaust through dust collectors/baghouse). This would have also halved the concentrations in the model (since concentrations and emission rates are directly related), putting the 1-hour well below the ESL. However, the applicant did not elect to re-evaluate the ESL modeling, leaving the more conservative estimates.

Heavy Metals, Dioxins and Furans, and Organic Hazardous Air Pollutants (HAPS)

The heavy metals, mercury or lead could potentially be present in trace amounts in limestone, clays, sands, bauxite, or iron ore used in clinker production. Mercury and lead from cement kilns are specifically regulated by the EPA due to their potential presence, toxicity, and ability to be quantified. Both of these metals were modeled against ESLs and NAAQS, respectively. Other potentially present heavy metals are not expected to be in sufficient concentrations to merit further analysis or regulation. Additionally, mercury has an extremely low effects screening level and is expected to be the most frequently occurring heavy metal in cement. As an example, the short-term ESL for chromium is 3.6 µg/m^3. The ESL for cadmium is 5.4 µg/m^3. The short-term ESL for mercury is 0.25 µg/m^3. Therefore, for cement kilns, demonstrating that emissions of mercury (which are expected in higher amounts) are within health effects guidelines effectively serves as a demonstration that other metals would be expected to not contribute to adverse health effects. Similarly, lead is specifically regulated in terms of allowable emissions from cement kilns and additionally was modeled against its NAAQS standard (results are above). Higher concentrations of heavy metals are typically associated with kilns which burn hazardous waste. The draft permit does not allow the burning of hazardous waste as a fuel at this proposed facility.[4] Additionally, the Applicant modeled against the portland cement ESL. This ESL was developed to account for all compounds which could be found in cement and provide a path for a single modeling demonstration which accounts for all species which could be present in the mixture. Portland cement had a predicted 1-hour exceedance of the ESL of 53 µg/m^3 compared to a 1-hour ESL of 50 µg/m^3. These emissions were therefore reviewed by the Toxicology Division. The Toxicology Division does not anticipate any short- or long-term adverse health effects to occur among the general public as a result of exposure to the proposed emissions from this facility. This demonstration was also performed prior to the Applicant accepting a more stringent requirement on baghouse control levels. These requirements effectively halved emissions from most sources of portland cement dust. This would have resulted in a predicted concentration below the ESL; however, the Applicant left the demonstration at the more conservative number and did not perform a subsequent demonstration at the new lower emission rate. Therefore, this analysis was extremely conservative.

[4] *See* EPA Report to Congress on Cement Kiln Dust, December 31, 1993, available at https://archive.epa.gov/epawaste/nonhaz/industrial/special/web/pdf/chap-3.pdf.

Dioxins and furans are terms for a wide range of compounds. Specifically, for the cement industry EPA defines these as tetra-, penta-, hexa-, hepta-, and octa-chlorinated dibenzo dioxins and furans. Additionally, organic hazardous air pollutants (HAPS) can occur due to organics which can occur in some limestone formations. These are defined by the EPA as, "…the sum of the concentrations of compounds of formaldehyde, benzene, toluene, styrene, m-xylene, p-xylene, o-xylene, acetaldehyde, and naphthalene…".[5] The TCEQ does not typically request speciated modeling of these general categories of pollutants, rather it relies upon regulation of stack emission limits for the categories found in 40 CFR 63 (NESHAP) Subpart LLL. The draft permit reflects this rule in requirements for stack concentrations of both categories of pollutants. The EPA states in its Final Rule: Portland Cement Manufacturing Residual Risk and Technology Review Fact Sheet (https://www.epa.gov/sites/default/files/2018-07/documents/pc_neshap_rtr_final_rule_fact_sheet.pdf): "After conducting a risk analysis of facility emissions under the fully implemented MACT standards, EPA found no appreciable health or ecological risks due to air toxics emissions and, thus, risks are acceptable." The same document states that, "MACT standards protect public health with an ample margin of safety, and protect against adverse environmental effects." Therefore, compliance with 40 CFR 63 (NESHAP) Subpart LLL rules relating to compounds such as dioxins and furans and organic HAPS (as well as other hydrocarbons as regulated with the VOC limit) is expected to result in protectiveness. The Applicant performed all demonstrations required by EPA NAAQS standards and TCEQ permitting practices for cement kilns.

State Property Line Analysis (30 TAC Chapter 112)

Because this application has sulfur emissions, the Applicant conducted a state property line analysis to demonstrate compliance with TCEQ rules for net ground-level concentrations for sulfur dioxide (SO_2), hydrogen sulfide (H_2S), and sulfuric acid (H_2SO_4), as applicable. This analysis demonstrated that resulting air concentrations will not exceed the applicable state standard, as shown in Table 8 below.

Table 8. Site-wide Modeling Results for State Property Line

Pollutant	Averaging Time	GLC_{max} (µg/m^3)	Standard (µg/m^3)
SO_2	1-hr	12	1021
H_2SO_4	1-hr	22	50
H_2SO_4	24-hr	7	15

The proposed emissions increases have been adequately represented and included in the impact analysis. Additionally, TCEQ staff and the ADMT have reviewed the proposed emissions from sources, represented source parameters and locations, point and area source representations, and background concentrations. Based on the data and representations, TCEQ staff and ADMT determined that the modeling analysis was acceptable.

[5] 40 CFR 63.1341.

In summary, based on the Executive Director's staff review, it is not expected that existing health conditions will worsen, or that there will be adverse health effects on the general public, sensitive subgroups, or the public welfare and the environment as a result of proposed emission rates associated with this project. Please *see* Response 15 for additional information regarding BACT and Response 12 for additional information regarding emissions sources and calculations used to support the application.

Greenhouse Gases

EPA has stated that unlike the criteria pollutants for which EPA has historically issued PSD permits, there is no NAAQS or PSD increment for GHGs. The EPA Administrator has recognized that human-induced climate change has the potential to be far-reaching and multi-dimensional. See Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, 75 Fed. Reg. 66496, 66497 (Dec. 15, 2009). Climate change modeling and evaluations of risks and impacts are typically conducted for changes in emissions that are orders of magnitude larger than the emissions from individual projects that might be analyzed in permit reviews. Quantifying the exact impacts attributable to a specific GHG source obtaining a permit in specific places and points would not be possible with current climate change modeling.[6] Thus, EPA has concluded it would not be meaningful to evaluate impacts of GHG emissions on a local community in the context of a single permit.

The TCEQ has determined that an air quality analysis for GHG emissions would provide no meaningful data and has not required the Applicant to perform one. As stated in the preamble to the TCEQ's adoption of the GHG PSD program, the impacts review for individual air contaminants will continue to be addressed, as applicable, in the state's traditional minor and major NSR permits program per 30 TAC Chapter 116 and 30 Tex. Reg. 2629, 2904 (April 11, 2014).

Crystalline Silica Emissions

Crystalline silica was modeled by the applicant due to its potential presence in cement and its ingredients. All predicted concentrations were below their respective ESLs, as shown above.

Climate Change

EPA has stated that unlike the criteria pollutants for which EPA has historically issued PSD permits, there is NAAQS for Greenhouse Gasses (GHGs), including no PSD increment. Climate change modeling and evaluations of risks and impacts are typically conducted for changes in emissions that are orders of magnitude larger than the emissions from individual projects that might be analyzed in permit reviews. Thus, EPA has concluded it would not be meaningful to evaluate impacts of GHG emissions on a local community in the context of a single permit. For these reasons, the TCEQ has determined that an air quality analysis for GHG emissions would provide no meaningful data and has not required the Applicant to perform one. Based on EPA policies, the TCEQ only regulates GHG emissions when they are associated with federal

[6] *See* EPA PSD and Title V Permitting Guidance for GHGs, March 2011 at 48.

major source projects and permits which emit the associated pollutants. This permit does trigger federal major source review and therefore is required to quantify and evaluate GHG emissions, authorized under greenhouse gas permit no. GHGPSDTX212.

Emissions from the Quarry and Roads

The TCEQ's jurisdiction is established by the Legislature and is limited to the issues set forth in statute. Accordingly, the TCEQ does not have jurisdiction to enforce employee safety regulations promulgated by the Occupational Safety and Health Association (OSHA) or to consider employee health when determining whether to approve or deny an application for an air authorization. As stated in Response 25, the TCEQ does not have jurisdiction to regulate mines, quarries, or associated blasting. Mines and quarries are specifically excluded from the definition of facility in the TCAA § 382.003(6); therefore, modeling related to mining and quarry operations are outside the scope of review of this application.

The TCEQ does regulate nuisance dust. Accordingly, provisions for visible emissions at the property line, for using a street sweeper on plant roads, and for their paving, maintenance and cleaning were included in the draft permit.

EPA Consideration

No proposal was made during the review period to relax emissions, rather the Applicant gradually reduced emission proposals over the course of the review. No reduction was made to averaging periods. EPA provided comments throughout the review process. EPA was in the loop continuously throughout the NO_X reductions/modeling progress.

Summary

In summary, based on the Executive Director's staff review, it is not expected that existing health conditions will worsen, or that there will be adverse health effects on the general public, sensitive subgroups, or the public welfare and the environment as a result of proposed emission rates associated with this project.

COMMENT 2: Modeling Details

Adequacy of the PSD Modeling Protocol

Commenters expressed general concern regarding representations made in the modeling submittal and question whether the PSD modeling protocol was adequate.

Model Representations and Approaches

Commenters questioned the representations made in the modeling submittal, including the represented meteorological data, wind speeds, elevations, surface roughness, off-property sources, receptors, represented stack heights, background concentration representations, and monitor selection. Commenters question the accuracy of the modeling submittal if the information used was not obtained directly from the site. Commenters express concern that local wind data was not utilized,

referring to a local 'weather station' residents installed themselves, and further comment that the terrain classification is incorrect by not using the 'post-build out information'.

Monitoring Ambient Conditions

Duncan C. Norton expressed concern that the modeling did not properly account for ambient conditions.

Non-Regulated Sources in Model

Commenters request that the Applicant be required to represent mining and quarry operations, truck hauling emissions, and blasting emissions in their modeling submittal in addition to the representations of the cement plant itself.

PSD Increment

Commenters expressed concern that the modeling did not correctly calculate incremental PSD emissions.

Nearby Facilities and Nonattainment Status

Jeremy Devore questioned a list of facilities in proximity to the proposed plant as it relates to modeling and monitor selection, and further expressed concern that the permit would cause nonattainment status.

Modeling Protocol Cycles

David Smith questioned the completion date of the modeling protocol, asking for an explanation of either 'non-posting' or back dating the modeling protocol completion date.

Modeling of Lead and Mercury

Mr. Smith asks how far the modeling says mercury and lead emissions will be spread, and in what prevailing wind direction.

Changes to the Model and TCEQ Approval of Impacts

Deirdre Diamond expressed concern that the application was not originally approved due to the initial modeling submittal showing that there would be a significant deterioration in air quality, further asking what values were not within allowable limits and questioning what changed in the application to meet the new standards for the permit to later be approved.

Deficiency Responses

Ms. Diamond cited various deficiency items from the ADMT with regard to the Electronic Modeling Evaluation Workbook (EMEW) review and various modeling submittals, asking how and when each deficiency item was addressed, how each item was updated, how each item was reviewed and approved for accuracy, and asks how the applicant complied with all current modeling standards.

Accuracy of the Model

Ms. Diamond asks if the modeling reflects the most accurate depiction of the impact to the local environment.

Off-Property Sources

Ms. Diamond asks how TCEQ factored in outside and off property sources in the modeling submittal, asks what outside and off property sources were represented, and asks how a permit can be approved when the modeling results are just below the current standards. Ms. Diamond asks how the area is not considered as a nonattainment area when factoring in the cumulative and surrounding air quality from nearby concrete batch plants.

Receptor Grids

Ms. Diamond asks what receptor sites were identified during the modeling process, what the predicted values are, what numerical changes to air quality are for each pollutant analyzed and asks for the furthest distance of a receptor identified in the modeling.

(Nancy Brown, Kristin Chandler, Megan C. Chandler, Cassady A. Craddock, Linda Carol Crain, Bruce Dawsey, Jeremy Devore, Jeremy W. Devore, Deirdre Diamond, Judith S. Dryden, Harold C. Foster, Chloe Grooms, Joshua Grooms, Lisa Hejny, Lori Huntsman, Suzanna Dryden Jensen, Ken King, Rick Kvaal, Cindy Kvaal, William Landrum, Christopher A. Lopez, Jim Lucas, Trudy Lucas, Karla McDonald, Davida Miorin, Cindy Mitchell, Duncan C. Norton, Jeff Overstreet, Sherry Perrin, Kathy Raner, Justin Neal Raner, Russell Rutherford, Bradley J. Schnitker, Marci Schnitker, Peter Schulze, Betty Scott, David Smith, Wendy Smith, Sr Bobby Overbey Sr., Chandler Strawn, Sathappun Subbiah, Tonya Troxtell, Becky Vincent, Mark Vodry, Kimberly Vodry, Leonard G. Waldrum, Cynthia L. Weems)

RESPONSE 2: Grayson County is currently designated as being in attainment or unclassifiable for all pollutants. An impacts analysis was conducted for this project and demonstrates that the proposed facility will not cause or contribute to an exceedance of the NAAQS; therefore, the project is not expected to cause the county to be designated as nonattainment.

Adequacy of the PSD Modeling Protocol

A modeling protocol provides information and details on how the AQA will be conducted. The applicant provided a modeling protocol with the submittal of the air permit application. This modeling protocol was reviewed by the TCEQ's Air Dispersion Modeling Team (ADMT), and comments were sent to the applicant. The applicant made revisions to the modeling protocol to address ADMT comments, and this cycle repeated up to the submittal of the air quality analysis.

Model Representations and Approaches

For this air permit application, appropriate site-specific air dispersion modeling was performed. The applicant used the EPA-preferred AERMOD air dispersion modeling program to provide an estimate of the worst-case potential impacts on the area surrounding the proposed project site. The modeling procedures, methodology, predictions, and results were reviewed by ADMT, and the analysis was determined to be acceptable.

The purpose of the air dispersion modeling analysis for the New Source Review (NSR) preconstruction permitting program is to estimate reasonable worst-case pollutant concentrations using representative meteorological data, acceptable modeling techniques, and source data represented in the air permit application. The collection and use of on-site meteorological data is not a requirement when conducting air dispersion modeling in support of the NSR preconstruction permitting program. TCEQ and EPA guidance allow for the use of off-site meteorological data collected by a nearby National Weather Service (NWS) station when conducting air dispersion modeling provided that the NWS meteorological data are representative for the project site. An important component to meteorological data representativeness is whether or not the worst-case meteorological conditions have been sufficiently represented in the meteorological dataset. With five years of hourly NWS meteorological data used in the air dispersion modeling analysis, the worst-case meteorological conditions have been sufficiently represented in the dataset.

With respect to terrain used for the project site location, the applicant will be held to the representations made for the terrain elevations used for the proposed sources. And these could reflect project site preparation and/or grading work.

PSD Increment

Air dispersion modeling is not used to calculate incremental Prevention of Significant Deterioration (PSD) emissions. However, the PSD increment analysis conducted for this air permit application evaluated the proposed emissions and emissions from nearby off-property increment consuming sources. The results for the increment analysis demonstrate the proposed emissions would not cause or contribute to a PSD increment violation.

Nearby Facilities and Nonattainment Status

Jeremy Devore questioned a list of facilities in proximity to the proposed plant as it relates to modeling and monitor selection. Mr. Devore identified regulated entities (RNs) located within 10 kilometers (km) of the project site and noted that they were not included in the off-property inventory. The commentor also provided an excerpt from the modeling protocol (*Table 7-8. Emissions Inventory Data for $PM_{2.5}$ Sources within 10 km of Site and Monitor*) and noted how the Panda Sherman Power station is the only company reported as being included. Below is a summary for each of the identified RNs located within 10 km of the project site:

- RNs 100671619, 100739929, 100858299, 100954346, 101469237, 103064853, 110823325, and 111213443 – emissions from these RNs were explicitly modeled in the air quality analysis.
- RNs 100217223, 110780335, and 111112314 – emissions from these RNs were accounted for in the AQA with ambient monitoring data.
- RN 100603737 – not permitted for SO_2, NO_X, PM_{10}, or $PM_{2.5}$.
- RNs 102863081, 106503014, and 111053344 – permits are no longer active and void.
- RNs 105672687 and 108772588 – no longer active RN numbers.

The excerpt provided from the modeling protocol is a listing of RNs located within 10 km of the project site and within 10 km of an ambient monitor, and their associated emissions data for $PM_{2.5}$. These emissions data are from the State of Texas Air Reporting System database and are reported by the RNs to TCEQ annually. Not all RNs are required to reported emissions data (*see* Title 30 Texas Administrative Code § 101.10 for reporting requirements); therefore, this list is not meant to represent all RNs. These emissions data are used with other supporting information to justify the use of ambient monitoring data in the air quality analysis.

Also, regarding this excerpt, the commentor questioned the value of zero for $PM_{2.5}$ for Atrium Companies. For the most recent emissions reporting year (2022), Atrium Companies only reported emissions for volatile organic compounds.

Monitoring Ambient Conditions

The purpose of the air dispersion modeling analysis for the NSR preconstruction permitting program is to estimate reasonable worst-case pollutant concentrations using representative meteorological data, acceptable modeling techniques, and source data represented in the air permit application. The collection and use of on-site meteorological data is not a requirement when conducting air dispersion modeling in support of the NSR preconstruction permitting program. TCEQ and EPA guidance allow for the use of off-site meteorological data collected by a nearby NWS station when conducting air dispersion modeling provided that the NWS meteorological data are representative for the project site. An important component to meteorological data representativeness is whether or not the worst-case meteorological conditions have been sufficiently represented in the meteorological dataset. With five years of hourly NWS meteorological data used in the air dispersion modeling analysis, the worst-case meteorological conditions have been sufficiently represented in the dataset.

Non-Regulated Sources in Model

TCEQ does not have regulatory jurisdiction over quarry operations or any associated blasting, roads, or trucks per THSC § 382.003(6). Accordingly, the TCEQ rules do not require an applicant to analyze emissions resulting from quarry operations, blasting, roads, or the use of trucks in an individual permit application. The draft permit forbids the use of blasting as a nuisance dust prevention measure, and the Applicant has represented that it will not be necessary for quarrying activities. No air dispersion modeling was requested or required specifically relating to the quarry, roads, or trucks. However, mobile sources are accounted for as part of the background concentration used as part of NAAQS analysis.

Modeling Protocol Cycles

Multiple modeling protocols were provided during the air permit application review process. The reviews conducted for the modeling protocols were completed on the following dates: December 8, 2021; May 19, 2022; August 23, 2022; and January 23, 2023. There was no modeling protocol cycle during the time between March 28, 2023 and March 31, 2023.

Modeling of Lead and Mercury

The maximum predicted concentration of mercury occurred approximately 2.5 km to the south-southeast of the project site property. For the lead model predictions, the maximum predicted concentration occurred along the northwestern project site property line. Maximum predicted concentrations of mercury and lead were less than the ESL and NAAQS, respectively, at all modeled locations.

The model does not explicitly determine how far the emissions will spread. Calculations performed by the model will be conducted for all receptors included in the modeling analysis, even at those receptors located at distances that are not reachable given the hourly transport data. The model used in the air quality analysis, AERMOD, is appropriate to use for transport distances over which steady-state assumptions occur, out to 50 km.

Changes to the Model and TCEQ Approval of Impacts

The air permit application underwent numerous deficiency cycles and revisions related to the proposed NO_X emissions. TCEQ worked closely with the EPA on modeling approaches and did not accept the applicant's originally proposed NO_X emission rates and resultant expected effects on air quality in the area of the proposed project. The applicant revised the air permit application and proposed NO_X limits which were roughly one third of the amount originally proposed. This was achieved through proposing and accepting a permit limit of 0.54 lbs of NO_X per ton of clinker. This limit is much more stringent than the 1.50 lbs of NO_X per ton of clinker which other cement kilns in the US are required to comply with. This will be achieved through the use of a selective catalytic reduction (SCR) technology (widely used in other industries since the 1950s, and in cement kilns in Europe since 2001) or a combination of SCR and Selective Non-Catalytic Reduction (SNCR) to reduce NO_X. This draft permit limit and the attendant reduction in emissions from the kiln resulted in ADMT approval of the

modeling analysis and its approach. Additionally, the Applicant later requested more stringent bagfilter requirements for most sources (which reduced PM emissions) and demonstrated compliance with the revised annual $PM_{2.5}$ NAAQS standard.

Deficiency Responses

The AQA submitted by the applicant was reviewed by TCEQ's ADMT, and comments were sent to the applicant. The applicant provided responses and made updates to the AQA to address ADMT comments, and this cycle repeated up to the acceptance of the air quality analysis. The Applicant addressed all items identified by the TCEQ and ADMT staff, and responses to each item can be found in the permit file. *See* Response 10 regarding Application Representations and the Permit Review Process, and Response 9 regarding Access to Permit Documents.

The modeling procedures, methodology, predictions, and results were reviewed by ADMT, and the analysis was determined to be acceptable. The review process involves several parts. The first part of the process is to review the modeling methodology. Usually, the methodology is prescribed by established standard modeling procedures or practices. An example would be a NAAQS demonstration. First, the applicant models their net emissions increase to determine if a significant increase in any criteria pollutant's concentration in ambient air would be predicted. If the increase in concentration is not significant, then the demonstration would be complete. If the increase in concentration is significant, then a full NAAQS demonstration would follow. The prescribed methodology is to model all the sources at the site and all surrounding sources of the pollutant that could contribute to the area surrounding the site where the proposed increase is significant. A representative monitored background value would then be added to this result. The second part is to review the model inputs for consistency with the modeling report and the air permit application. The applicant is expected to represent all input data, e.g., source identifiers, elevations, locations, and exit parameters; building and structure locations, elevations, and dimensions; meteorological data for the proper period; and elevations of receptors where concentrations are calculated. ADMT checks all representations against what was actually modeled. The third part of the review is to determine whether the source characterizations are representative and/or appropriate. A vent or stack is easily represented as a point source; however, for other types of sources with emissions not originating from a vent or stack, the representation can vary. ADMT determines whether the source characterizations are representative or, if not, are represented in a conservative manner such that predicted concentrations should overestimate what ambient air concentrations would be.

Accuracy of the Model

The purpose of the air dispersion modeling analysis for the NSR preconstruction permitting program is to estimate reasonable worst-case pollutant concentrations using representative meteorological data, acceptable modeling techniques, and source data represented in the air permit application.

Off-Property Sources

For purposes of evaluating off-property sources, the applicant considered multiple items: explicitly modeling off-property sources, ambient monitoring data, project-level modeling results, and distances and magnitude of emissions. The off-property sources evaluated in the AQA are documented in the analysis provided by the applicant.

The AQA submitted by the applicant has been deemed acceptable, that is, the applicant has demonstrated the operation of the proposed facilities would not cause or contribute to a NAAQS or PSD increment violation, exceed a state property line standard, or adversely affect human health and welfare. As a result, the project is not expected to cause the county to be designated as nonattainment for any criteria pollutant.

Receptor Grids

The air dispersion modeling utilizes receptor grids for prediction of concentrations at specific points in the model. The applicant used receptor grids that began at the fence line and extended outward to determine model predictions in ambient air. Therefore, what the commenter referred to as "receptor sites" do not need to be identified. The ESL based analyses can utilize specific locations on the modeled grid to determine the nature of certain receptors, specifically whether they are industrial or non-industrial. In this case the area surrounding the proposed project site was considered non-industrial. The maximum predicted concentration at the fence line or beyond for each pollutant are reported above.

The modeled receptor grid extended from the fence line out to approximately 10 kilometers (km) for all pollutants and analyses except for the 1-hr NO_2 analysis. The 1-hr NO_2 analysis had a receptor grid that extended from the fence line out to approximately 25 km.

COMMENT 3: Dust / Nuisance / Winds

Commenters expressed concern about dust generated by the proposed project and that it may create nuisance dust conditions. Commenters expressed concern that the prevailing winds would carry dust and particulate matter to their homes, vehicles, and to the surrounding area. Jeffrey Brown expressed concern that the proposed emissions would contaminate nearby air handling systems. Jeffrey Overstreet asks if surrounding cities have been contacted with information about the average wind speed and direction that will push emissions into surrounding areas

David Smith expressed concern that PM which is fogged out of the air, dries, and becomes airborne again when the wind changes direction has not been considered in the application.

(Janice Akins, Samantha Allison, Amber Armendariz, Art Arthur, Sesily Babekuhl, Willies Ballou, Willies Carl Ballou, Robert Bauer, Heather Beaver, Ashley Beck, Francis Beck, James C. Boles, Jeffrey Brown, Jennifer Bullard, Veronica Calzada, Megan C. Chandler, Lee Collins, R. D. Cozad, Amanda Crawford, Stephanie Davidson, Bruce Dawsey, Thomas G. Debner, Jeremy Q. Devore, Jeremy Devore, Kathleen Dophied,

Judith S. Dryden, Michael Fannin, James N. Flanery, Adam Fleming, Bobby Fletcher, Lindsey Flores, Harold Foster, Frank Edward Gadek, Austin Grooms, Joshua Grooms, Jennifer Haeg, Ginger Ham, Dave Hammond, Jim L. Harvey, Lisa Hejny, Moses Hejny, Sarah Henry, Donna Hepner, Melissa Hill, Don Horn, Robin A. Horner, Scott Horner, Jen Huff, Alice Hughes, Lori Huntsman, Suzanna Dryden Jensen, Cynthia J. Kaleri, Ken King, Geri V. King, Laura L. King, Peggy Klas, Detra Klas, Anthony J. Kordosky, Rick Kvaal, Cindy Kvaal, William Landrum, Julie Lanicek, Jason R. Lankford, Jason Lankford, Patrick Latona, Mary Little, Christopher A. Lopez, Eric Lunde, Brian Mai, George Mason, Catherine Matuella, Dusty Wayne Mayer, William Mayer, Traci McCarthy, Traci McCarthy, Karla McDonald, Angela Moreau, Mary Morgan, Sharon Nelson, Paul Nixon, Margie Noel, Erica Northrup, Angie Onley, Bonita L. Overbey, Bobby N. Overbey, Jeff Overstreet, Jody Perry, Joshua D. Price, Lindsay Price, Delfina Prisock, Craig Rabe, Kathy Raner, Justin Neal Raner, Richard Reeves, Patsy A. Reeves, Joy Roberts, Mona Robnett, Brian Russell, Linda Russell, Shannon Ryan, Carrie Saindon, Joann Schnitker, Betty Scott, Derek Smith, David Smith, Drew Springer, Sara Sprinkle, James Stewart, Alice Stewart, Robert Stewart, Shirley Stewart, Chandler Strawn, Sathappun Subbiah, James Sutherland, Kenneth Svehlak, Sue Svehlak, Thomas Leland Taylor, Thomas L. Taylor, Julie Travis, Tonya Troxtell, Kristi Utley, Diana Vanbuskirk, Jenny Vonbehren, Jay Voto, Leonard G. Waldrum, Leonard G. Waldrum, Cameryn P. Warren, Manual Watson, Ronnie Whiteley, Rebecca Zey, Tracie Zweifel-Gibson, Gary Schnitker, Paula Neely, Robin Sears, Angela Onley, Borming Wang, Kenneth J. King)

RESPONSE 3: The primary activities that have the potential to emit particulate matter (i.e. dust) resulting from this project are the processing, storage, and handling of raw materials. All of the potential dust concentrations from the permitted sources have been evaluated based on operating parameters represented in the application and compared to the federal criteria mentioned above. The proposed permit contains the required control processes to minimize dust. When a company operates in compliance with the proposed permit there should be no deterioration of air quality or the generation of dust such that it impacts visibility. While nuisance conditions are not expected if the facility is operated in compliance with the terms of the permit, operators must also comply with 30 TAC § 101.4, which prohibits nuisance conditions.

Emission calculations are based on worse case emission scenarios for each facility. Air dispersion modeling is performed with worst case data which includes the effects of terrain, structures, wind, and temperature. Therefore, because a successful model demonstration shows that there should be no adverse effects from operations of the proposed plant under the worst-case conditions, normal operations will also have no expected adverse impacts.

COMMENT 4: Environmental Concerns

Commenters expressed concern about the effect of the proposed project on flora, fauna, and the surrounding environment. Commenters expressed concern about the potential impacts to nearby wildlife and plants, including but not limited to farmland, crops, pets, ranches, tree farms, livestock, cattle, horses, butterflies, bees, opossums, coyotes, bobcats, squirrels, geese, ducks, hawks, falcons, migratory birds, bald eagles, red bellied woodpeckers, and other endangered species. Commenters expressed concern regarding the impact on a nearby wildlife refuge. Jan Broomall expressed

concern for their miniature horse business, stating that their property is a certified wildlife habitat and bluebird sanctuary. Melissa Gail Croney expressed concern that wildlife in the area would be pushed out of their natural habitats and force them into the surrounding neighborhoods because of the project. Jeffery Overstreet asks how the proposed project will affect his cattle, specifically the quality of their meat and ability to reproduce, as well as asks how the project will affect hay quality and if it will impact the selling price. Mr. Overstreet also asks how the terrain will change due to the plant.

(Novin Abdi, Silvia Adams, Janice Akins, Ralph H. Armstrong, Ralph Armstrong, Art Arthur, Amy Ashlock, Andrea Paulette Aslam, Sesily Babekuhl, Keith Baehmann, Willies Ballou, Willies Carl Ballou, Darla Barr, Heather Beaver, Ashley Beck, Francis Beck, Blake C. Beeson, Deanna Bell, Gary Bennett, Tonya Bingham, James C. Boles, Nolan E. Bond, Nancy Bond, Linda Bowers, Paul David Bowers, Kristopher Daniel Bravo, Ashlin Bridwell, Jan Broomall, Nancy Brown, Jeremiah Broyles, Marie Burns, Brenna Butler, Veronica Calzada, Eric Cantu, Tommy Joe Carney, Cary Catching, Paula A. Cavender, Shane Cavender, Andrew Cellars, Corey Chambers, Nicole Chambers, Bobby Luke Chandler, Kristin Chandler, Laura Childress, Art Clayton, Robert Clough, Margaret Coleman, Lee Collins, Traber Cozad, Camryn Craddock, Cassady A. Craddock, Matthew Crain, Melissa Gail Croney, Donald Ray Cummings, Karen Cummings, Atul Dave, Angela Davidson, Alicia Davis, Julie Davis, Bruce Dawsey, Bruce W. Dawsey, Shawna Dawson, Thomas G. Debner, Jeremy Q. Devore, Jeremy Devore, Mary Gail Devore, Jeremy W. Devore, Joanne Dickey, Tiffany Drake, Judy Searcy Dryden, Robert E. Dryden, Judith S. Dryden, Searcy Dryden, William Engle, Angelica Escalera, Rachel Evans, Michael Fannin, Barrett Fannin, Lisa Flaggert, Lisa Marie Flaggert, Adam Fleming, Lindsey Flores, Frank Edward Gadek, Andrea Ganow, Rex Glendenning, Roberto Gonzalez, Patricia C. Gonzalez, Misty Gray, Linda J. Greenfield, Brandon Grooms, Joshua Grooms, Chloe Grooms, Rachel Grooms, Jennifer Haeg, Teresa M. Hall, Ginger Ham, Matt Hardenburg, Jim L. Harvey, Rod Hawkins, Patricia Hedrick, Moses Hejny, Lisa Hejny, Sarah Henry, Joann Hensley, Donna Hepner, Amy Hertel, Katerina Hess, Dwayne Hicks, Melissa Hill, Amy Hoffman-Shehan, Suzanne Hooks, Don Horn, Charity Horne, Scott Horner, Helen Horton, Jen Huff, Alice Hughes, Laura T. Hunt, Debbie Hurd, Billie Charels Ingram, Phyllis D. James, Suzanna Dryden Jensen, Liberty Johnson, Elizabeth Jones, Jake Jones, Mary Karam, James Kimbrel, Geri V. King, Laura L. King, Ken King, Keith Kisselle, Anthony J. Kordosky, Cindy Kvaal, Irms Kyle, Amanda Lambert, Chris Landino, William Landrum, Julie Lanicek, Jason R. Lankford, Val Lauerhahs, Crystal Lawson, Rhonda Lawson, Patsy Lemaster, Kylee Likarish, Victor Lissiak, Trudy Lucas, Eric Lunde, Dakotah Mahan, Rickey J. Malta, Josh Marr, Michael Gene Marsh, Monica Martin, Brittany Martin, George Mason, Catherine Matuella, Dusty Wayne Mayer, Traci McCarthy, Traci McCarthy, Claudia L. McClure, Les McConnell, Garrett McCown, Vivian Robin McCoy, Karla McDonald, Kevin Meissner, Davida Miorin, Michael J. Mitchusson, Joyce L. Moore, Mary Morgan, Jason Morin, Shandi Morris, Matthew Morris, Terry Morrison, Ashley Morrow, Sierra Mueller, Karen Murphy, Rick Myer, Chris Nicoloff, Marie Nixon, Marye Jean Norman, Duncan C. Norton, Angie Onley, Melinda Ortley, Jeff Overstreet, Jeffrey Tyler Overstreet, Paula Overstreet, Tyler Overstreet, Nikolaus Owen, James Parrish, Trent Patterson, Holland Paula, Jody Perry, Emily Powell, Lindsay Price, Delfina Prisock, Chelsey Pulcheon, Craig Rabe, Kathy Raner, Justin Neal Raner, Alan Redd, Laura Reeves, Kevin Diaz Reyes, Charity Riley, Mary Roberts, Mark Douglas Robison, Brad Robnett, Mona Robnett, Elizabeth Rodriguez, Mel Ronduen, Sharla Ross, Kara Royston, Bettye Russell, Linda Sue Russell,

Carrie Saindon, Jim Schermbeck, Marci Schnitker, Bradley J. Schnitker, Mary J. Scott, Betty Scott, Racheal Sedmack, True Shaw, David Sims, Sharon Slaughter, David Smith, Reggie Smith, Derek Smith, Leann Smith, Randall Spencer, Cynthia Annk Spencer, Sara Sprinkle, Roxanne Standerfer, Robert Stewart, Shirley Stewart, Alice Faye Stewart, Stephanie Strawn, Chandler Strawn, Dana Strong, Sathappun Subbiah, James Sutherland, Kenneth Svehlak, Sue Svehlak, Meghan Swindle, Thomas Taylor, Thomas L. Taylor, Thomas Leland Taylor, Shawn C. Teamann, Cristi Tenant, Alyssa Thomas, Dana Thornhill, Julie Travis, Tonya Troxtell, Kristi Utley, Diana Vanbuskirk, Mickinze Vanherpen, Marilyn Sue Vest, Becky Vincent, Larry W. Vincent, Kimberly Vodry, Mark Vodry, Darren W., Leonard G. Waldrum, Bihfang Wang, Brian Wang, Mingyan Ward, John Ward, Cameryn P. Warren, Jacqueline Wassom, Manual Watson, Shelbie Watts, Cynthia L. Weems, Casey Weinmann, Joseph White, Jennifer White, Edward Whitfield, Jeff Whitmire, Teresa Wildman, Gabriel Williams, Jennifer Williamson, Krista Lucas Wynn, Angela Zarallo, Rebecca Zey, Tracie Zweifel-Gibson, , Angela Wilson , David G. Sileven , Kaaren J. Teuber , Paula Neely , Robin Sears, Borming Wang, Sara Salinas)

RESPONSE 4: The secondary NAAQS are those the EPA Administrator determines are necessary to protect public welfare and the environment, including animals, crops, vegetation, visibility, and structures, from any known or anticipated adverse effects associated with the presence of a contaminant in the ambient air. Because the emissions from this facility should not cause an exceedance of the NAAQS, air emissions from this facility are not expected to adversely impact land, livestock, wildlife, crops, or visibility, nor should emissions interfere with the use and enjoyment of surrounding land or water. Please *see* Response 1 for an evaluation of this project's impacts in relation to the NAAQS. In addition, 30 TAC § 101.4 prohibits the discharge of contaminants which may be injurious to, or adversely affect, animal life.

Compliance with rules and regulations regarding endangered species is handled at the state level by the Texas Parks and Wildlife Department and at the federal level by the United States Fish and Wildlife Service. It is incumbent upon an applicant to request and acquire any additional authorizations that may be required under state or federal law, and to follow all applicable state and federal rules and regulations. However, if operated in accordance with the requirements of the permit, adverse impacts from the proposed plant are not expected.

COMMENT 5: Additional Studies

Commenters requested that an environmental impact study (EIS) be conducted prior to authorization of this project. Commenters ask if the Applicant has produced a study of the local limestone, including an expulsion test showing what organic compounds and pollutants will be generated in daily operation.

(Tiffany Drake, Chloe Grooms, Joshua Grooms, Lisa Hejny, Scott Horner, Terri Langford, Jost Marr, Russel Rutherford, Mark Vodry, Kimberly Vodry)

RESPONSE 5: Environmental Assessments and Environmental Impact Statements (EIS) are a specific requirement for federal agencies under the National Environmental Policy Act (NEPA). An EIS is not required for state actions such as this permit. However, both the TCAA and the TCEQ rules provide for an extensive review of the application to ensure that emissions from the proposed facility will not violate the NAAQS and will not be expected to adversely affect human health or the environment. A health effects review was conducted for the proposed facilities during the permit review and the permit was found to be protective of human health and the environment.

COMMENT 6: Water / Hazardous Waste / Other Authorizations

Commenters expressed concern about the amount of water the plant would need for its operations, stating that the area already has low water availability and that the plant would exacerbate the water supply and water table. Several commenters expressed concern that the proposed plant will cause water contamination and negatively impact water sources in the area, including but not limited to creeks, the water table, public and private drinking water wells, the floodplain, groundwater, aquifers runoff, lakes, swimming holes, the watershed, and ponds. Commenters expressed concern regarding the proposed project as it relates to acid rain. Commenters request a written plan be submitted for the contamination of the Choctaw and Trinity watershed systems. Commenters are concerned that water was not considered as part of the PSD permit requirements. Commenters request investigations from Texas Parks and Wildlife (TPWD), EPA, and the Department of Homeland Defense regarding possible water contamination of the Trinity River and Choctaw Watershed. Commenters express concern that a hazardous waste permit has not been obtained. Jeff Overstreet asks how the Applicant will remove excessive water from their property, and asks how the plant will impact erosion, flooding, and swelling of creeks. Mr. Overstreet asks what will happen if the Applicant accidently damages the aquifer and where residents will get water if that is the case.

Jody Perry asked about waste disposal and if there would be recycling. Manual Watson expressed concern that local wastewater systems will not be able to keep up. Jan Broomall expressed concern that the proposed project would generate toxic waste. Judy Searcy Dryden expressed concern regarding the flood plain, stormwater runoff, and potential acid rain runoff. Jost Marr expressed concern that the Applicant would build the plant without obtaining any other required permits.

(Group A, Silvia Adams, Randy Adams, Janice Akins, Luz Arce, Ralph H. Armstrong, Katrina Lynn Arsenault, Art Arthur, Andrea Paulette Aslam, Sesily Babekuhl, Willies Ballou, Willies Carl Ballou, Douglas Glenn Banner, Kelly Denise Barnes, Robert Bauer, Heather Beaver, Ashley Beck, Francis Beck, Blake C. Beeson, Patti Beggs, Deanna Bell, Gary Bennett, Liz Birchall, Nancy Bond, Nolan E. Bond, Ashlin Bridwell, Lorie Brockner, Ron Brockner, Jan Broomall, Laffel Brown, Nancy Brown, Tiffany Broyles, Jeremiah D. Broyles, Veronica Calzada, Shane Cavender, Nicole Chambers, Bobby Luke Chandler, Kristin Chandler, Megan C. Chandler, Art Clayton, Karla K. Colwell, Katie Courange, R. D. Cozad, Skyler Cozad, Traber Cozad, Camryn Craddock, Cassady A. Craddock, Matthew Crain, Amanda Crawford, Melissa Gail Croney, Karen Cummings, Kristen Cunningham, Tracy R. Curry, Atul Dave, Chanel Ann Davis, Alicia Davis, Bruce Dawsey, Bruce W. Dawsey, Shawna Dawson, Jeremy Q. Devore, Jeremy Devore, Deirdre

Diamond, Joanne Dickey, Kathleen Dophied, Judy Searcy Dryden, Robert E. Dryden, Judith S. Dryden, Searcy Dryden, Cindy Durrant, Michael Joseph Elliott, Mark L. England, William Engle, Cendy Y. Escalera, Blanca Nayeli Escalera-Solis, Rachel Evans, Michael Fannin, Lisa Flaggert, Adam Fleming, Lindsey Flores, Harold Foster, William Foster, Frank Edward Gadek, Andrea Ganow, Chris Gardner, Rex Glendenning, Lora Gordon, Austin Grooms, Joshua Grooms, Brandon Grooms, Chloe Grooms, Richard Oran Gross, Jennifer Haeg, Ginger Ham, Matt Hardenburg, Letitia Harris, Jim L. Harvey, Patricia Hedrick, Lisa Hejny, Moses Hejny, Sarah Henry, Joann Hensley, Jerry Dean Hestand, Debbie Hester, Michael S. Hignight, Melissa Hill, Amy Hoffman-Shehan, Suzanne Hooks, Charity Horne, Scott Horner, Robin A. Horner, Helen Horton, Alice Hughes, Mandy Hummel, Laura T. Hunt, Lori Huntsman, Debbie Hurd, Billie Ingram, Rachel Jenkins, Suzanna Dryden Jensen, Elizabeth Jones, Lori Jones, Debbie Elaine Judkins, Mary Karam, Brittany Kennedy, Geri V. King, Ken King, Laura L. King, Geri V. King, Peggy Klas, Detra Klas, Vanetta Klok, Rick Kvaal, Cindy Kvaal, Irms Kyle, Benjamin T. Landgraf, William Landrum, Julie Lanicek, Jason R. Lankford, Patrick Latona, Val Lauerhahs, Wayne Lee, Kylee Likarish, Christopher A. Lopez, Jim Lucas, Trudy Lucas, Eric Lunde, Ronald Clay Lynch, Dakotah Mahan, Brian Mai, Sarah Mallory, Rickey J. Malta, Jost Marr, Michael Gene Marsh, Brittany Martin, Catherine Matuella, Patsy Mauldin, William Mayer, Traci McCarthy, Les McConnell, Vivian Robin McCoy, Karla McDonald, Larry McDonald, Lauren McNutt, Kevin Meissner, Amy Meyer, Davida Miorin, Michael J. Mitchusson, Mehrdad Moayedi, Angela Moreau, Matthew Morris, Terry Morrison, Sierra Mueller, Karen Murphy, Rick Myer, Jason Lee Naramor, Mitaj Nathwani, Sharon Nelson, Jacob Nelson, Sarah Newtown, Andeelea Anderson Nichols, Danny Thomas Nichols, Chris Nicoloff, Marie Nixon, Margie Noel, Erica Northrup, Brent Omdahl, Brent E. Omdahl, Angie Onley, Bonita L. Overbey, Jeff Overstreet, Paula Overstreet, James Parrish, Trent Patterson, Melisa Patzer, Sherry Perrin, Jody Perry, Emily Powell, Lindsay Price, Delfina Prisock, Kathy Raner, Justin Neal Raner, Alan Redd, Patsy A. Reeves, Kevin Diaz Reyes, Cindy Risk, Naif Risk, Mark Douglas Robison, Mona Robnett, Liz Rocamontes, Elizabeth Rodriguez, Sharla Ross, Kara Royston, Kayli Rushing, Brian Russell, Linda Russell, Linda Sue Russell, Christina R. Rykens, Carrie Saindon, Joann Schnitker, Bradley J. Schnitker, Mary J. Scott, Betty Scott, Racheal Sedmack, True Shaw, Rosa Shelton, Gary Shields, David Sims, Sharon Slaughter, David Smith, Reggie Smith, Wendy Smith, James Southerland, Jeff Randall Spencer, Frances Sprabary, Bobby Overbey Sr., Penny Stahl, Roxanne Standerfer, Robert Stewart, Shirley Stewart, Chandler Strawn, Sathappun Subbiah, James Sutherland, Kenneth Svehlak, Sue Svehlak, Betty Jean Taylor, Shawn C. Teamann, Cristi Tenant, Alyssa Thomas, Dana Thornhill, Lisa Tibbets, Yolanda Trevino, Tonya Troxtell, Marilyn Sue Vest, Becky Vincent, Mark Vodry, Kimberly Vodry, Jenny Vonbehren, Jaymison Bella Voto, Leonard G. Waldrum, Bihfang Wang, Brian Wang, Cameryn P. Warren, Kevin Wasp, Jacqueline Wassom, Manual Watson, Shelbie Watts, Cynthia L. Weems, Monique Whaley, Steve Whaley, Joseph White, Edward Whitfield, Jeff Whitmire, Krista Lucas Wynn, Rebecca Zey, Tracie Zweifel-Gibson, David G. Sileven, Dorothy Schmoker, Jennita Wingate, Kaaren J. Teuber, Lainie Ramsay, Nancy Jan Shaw, Robin Sears, Angela Onley, Borming Wang, Kenneth J. King, Elizabeth Rocamontes)

RESPONSE 6: Although the TCEQ is responsible for the environmental protection of air and water as well as the safe management of waste, this proposed permit will regulate the control and abatement of air emissions only. Therefore, issues regarding water quality or discharge and the handling of waste are not within the scope of this review. However, the Applicant may be required to apply for separate authorizations for water quality, water usage, or the handling of waste. This permit does not authorize the discharge of pollution into a body of water or the storage or handling of hazardous waste. Acid Rain requirements are addressed through the Federal Acid Rain Program. The requirement to obtain an Acid Rain Permit is independent of the requirement to obtain a NSR permit.

COMMENT 7: Public Notice

Commenters expressed general concern regarding the Public Notice publication and expressed concern that Public Notice requirements were not met. Multiple commenters expressed concern by the lack of response to comments submitted during the public comment period, asking the TCEQ to thoroughly address and answer concerns raised by community members. Multiple commentors state that they should be considered an affected person with the right to request a contested case hearing, not just those that live within a specific radius of the proposed project.

David Smith expressed concern that the Applicant did not fulfill the posting requirements and did not truly or fairly represent the date of notice, further expressing concern that the notice occurred around Christmas. Mr. Smith also stated the notice did not provide the public enough time to respond with comments, asks for a re-notice to be published, asks that the public have the maximum allowable time to respond with comments, and asks that the public be able to participate in any hearing.

(Ron R. Brockner, Jeremy W. Devore, Kenneth Griffin, William Landrum, Josh Marr, Karla McDonald, Brian Norris, Sherry Perrin, Cynthia Reyes, Betty Scott, David Smith, Bobby Overbey Sr., Chandler Strawn, Sathappun Subbiah, Manual Watson, Cynthia L. Weems)

Number of Comments

David Smith questioned the number of comments represented to have been submitted regarding this project, specifically asking why the counts reflected on the website (TCEQ Commissioner's Integrated Database [CID]) to view public comments have fluctuated each time he has tried to view them.

Sign Posting and Public Comment Period

David Smith questions the date TCEQ CID shows as first public notice having been completed, stating that the Applicant's posted signs were not posted in both English and Spanish during the entire comment period and therefore first public notice should not be considered complete.

Bilingual Notice and Public Participation / Environmental Justice

Commenters expressed concern that the Applicant misrepresented the nearby school district and applicability to bilingual notice requirements, further expressing concern bilingual notice requirements were not fulfilled because public notice was not published in Spanish. Kristopher Daniel Bravo commented that by failing to provide adequate bilingual communication, TCEQ is perpetuating systemic barriers that disproportionately affect Hispanic people and undermine their civil rights. Mr. Bravo further asked that the TCEQ prioritize bilingual outreach efforts to ensure that all residents have equal access to information and opportunities to participate in the decision-making process, regardless of language proficiency. Paul Daniel Lopez commented that the lack of bilingual outreach regarding the proposed project ignores the cultural and linguistic needs of the Hispanic community and potentially violates their civil rights. Jay Voto asks why they were not notified by mail about the public meeting.

(Willies Carl Ballou, Kristopher Daniel Bravo, Cassady A. Craddock, Jeremy Q. Devore, Jeremy Devore, Harold C. Foster, Austin Grooms, Joshua Grooms, Chloe Grooms, Lisa Hejny, Laura T. Hunt, Suzanna Dryden Jensen, Paul Daniel Lopez, Angela Moreau, Sarah Myrick, Jeff Overstreet, Jose Fernando Pena, Kathy Raner, Justin Neal Raner, Russell Rutherford, Bradley J. Schnitker, Marci Schnitker, David Smith, Jay Voto)

Increment Analysis

Janice Akins questioned the specific increments represented on the Public Notice publication, stating that they are from 2021 and may be out of date.

RESPONSE 7: TCEQ welcomes public participation in the permitting process. The Executive Director instructs applicants to provide public notice as required by commission rules, in accordance with statutory requirements. Specifically, the TCAA § 382.056 requires that an applicant publish notice. Notice must be published in a newspaper of general circulation in the municipality in which the proposed facility is located or proposed to be located. The notice must include a description of the facility, information on how an affected person may request a public hearing, pollutants the facility will emit, and any other information the TCEQ requires by rule. The commission also requires that notice be published in an alternative language if the elementary or middle school nearest the proposed facility offers a bilingual education program as required by Texas Education Code Chapter 29, Subchapter B. The TCEQ adopted rules for these public notice requirements in 30 TAC § 39.603, Public Notice of Air Quality Applications, Newspaper Notice.

As described in the Procedural Background above, The Notice of Receipt and Intent to Obtain an Air Quality Permit (first public notice, NORI) for this permit application was published in English on December 19, 2021, in the *Herald Democrat*. The Notice of Application and Preliminary Decision for an Air Quality Permit (second public notice, NAPD) was published on February 22, 2024, in English in the *Herald Democrat*. A Consolidated Notice of Receipt of Application and Intent to Obtain Permit and Notice of Application and Preliminary Decision (third public notice, consolidated NORI and NAPD) was published in English on July 9, 2024, in the *Herald Democrat* and in

Spanish on July 9, 2024, in *La Prensa.* To demonstrate compliance with public notice requirements, applicants are required to provide the Office of the Chief Clerk with copies of the published notice and a publisher's affidavit verifying facts related to the publication, including that the newspaper is a paper of general circulation in the municipality in which the proposed facility is located or proposed to be located.

TCEQ rules also require that a public meeting be held if a member of the legislature who represents the general area in which the facility is located requests a public meeting or if the Executive Director determines that there is a substantial or significant degree of public interest. *See* 30 TAC § 55.154(c)(2). A public meeting was held on March 25, 2024, at 7:00 PM at the Hilton Garden Inn Denison/Sherman/At Texoma Event Center, 5015 South U.S. 75, Denison, Texas 75020. The notice of public meeting was mailed on February 9, 2024, and an amended notice of public meeting was mailed on February 13, 2024. The public comment period ended on August 14, 2024, following publication of a third combined notice due to updates to the application and to perform Spanish language publication in order to correct deficiencies in the previous public notice. Additionally, signs were required to be re-posted for the duration of the comment period in both English and Spanish.

Any member of the public may submit comments on the application. This Response is the written response to all formal comments received during the comment period for the application. Directions for accessing a copy of this Response on the TCEQ CID will be mailed to each person who submitted a formal comment or who requested to be on the mailing list for this permit application and provided a mailing address. All timely formal comments received are included in this Response and are considered before a final decision is reached on the permit application. This Response provides a final 30-day period to request a contested case hearing.

In order for an issue to be considered at a contested case hearing, it must have been first raised in a comment or in a request for a contested case hearing during the public comment period by the affected person or group requesting the hearing. The Commissioners' decision whether to grant a contested case hearing is based in part on the information the requester submits. When requesting a hearing, it is necessary to demonstrate that the requester is an "affected person," in order to be granted party status. This means that the requester must be personally affected by the permit decision and that granting the permit would specifically affect the requester in ways not shared by the general public – for example, by impairing the requester's health or safety or by interfering with the use or enjoyment of the requester's property. Affected persons may request a contested case hearing to challenge the Executive Director's decision on an application. The applicant may directly refer the application to the State Office of Administrative Hearings for a contested case hearing, instead of waiting for the Commission to make a determination on whether the case should be referred.

The public notice rules applicable to this application are described above. An overview of public participation for applications filed after September 1, 2015 is available on the TCEQ website at: https://www.tceq.texas.gov/agency/decisions/participation/permitting-participation/pub_part.html. *See* Response 10 for more information about the permitting process.

Number of Comments

The Office of the Chief Clerk counts comments as they arrive and they subsequently classify them – specifically, whether they fall as a general comment, a contested case hearing request, a meeting request, or all of these. These comment counts fluctuate as comments are manually sorted into categories and changed from "comments" to, for instance, "contested case hearing request." For projects with a high volume of comments, it is typical for counts to fluctuate and change as the comments are gone through one by one and sorted into their categories.

Sign Postings and Public Comment Period

Title 30 TAC § 39.604 requires that signs be placed at the site of the existing or proposed facility. The sign(s) must state that an air permit application has been filed, the proposed permit number, and how the public may contact the commission for further information.

Each sign placed at the site must be located within ten feet of every property line paralleling a public highway, street, or road. Signs must also be visible from the street, meet lettering requirements, meet size requirements, and be spaced at not more than 1,500-foot intervals. A minimum of one sign, but no more than three signs are required along any property line paralleling a public highway, street, or road. Finally, in cases which notice is required to be published in an alternative language, the applicant must also post signs in the applicable alternative language.

The Applicant provided verification to the Office of the Chief Clerk in accordance with 30 TAC § 39.605 that signs were posted at the proposed site in accordance with 30 TAC § 39.604. The Applicant provided verification to the Office of the Chief Clerk in accordance with 30 TAC § 39.605 that signs were posted at the proposed site in accordance with 30 TAC § 39.604. During the first public notice, the signs were not displayed or went missing. Comment periods and sign posting durations can be extended by TCEQ, and in this case the comment period was extended by the number of days the signs were observed to be missing.

Bilingual Notice and Public Participation / Environmental Justice

TCEQ and the Applicant both attempted to contact the Howe ISD to determine whether or not a Bilingual Education Program was required in the district. The administrative staff failed to return phone calls. However, due to public input relating to which local school district was the correct one and claims that a Bilingual Education Program was required for Howe ISD, TCEQ required the applicant to publish a Consolidated Notice of Receipt of Application and Intent to Obtain Permit and Notice of Application and Preliminary Decision (third public notice), providing updated notice for the application in both English and Spanish. This was published in Spanish on July 9, 2024, in *La Prensa*.

Air permits evaluated by the TCEQ are reviewed without reference to the socioeconomic or racial status of the surrounding community. The TCEQ is committed to protecting the health of the people of Texas and the environment regardless of location. A health effects review was conducted for the proposed facilities during the permit review and the permit was found to be protective of human health and the environment. The TCEQ encourages participation in the permitting process. The Office of the Chief Clerk works to help the public and neighborhood groups participate in the regulatory process to ensure that agency programs that may affect human health or the environment operate without discrimination and to make sure that concerns are considered thoroughly and are handled in a way that is fair to all. You may contact the Office of the Chief Clerk at 512-239-3300 for further information. More information may be found on the TCEQ website: Title VI Compliance at TCEQ - Texas Commission on Environmental Quality - www.tceq.texas.gov.

A member of the public may request to be put on a mailing list for a specific permit or for a county. Additionally, anyone who provides a comment, requests a public meeting, or requests a contested case hearing is automatically added to the mailing list. For more information, please visit Overview: Public Participation in Environmental Permitting - Texas Commission on Environmental Quality - www.tceq.texas.gov.

Increment Analysis

The results of the PSD increment analysis are required to be included in Notice of Application and Preliminary Decision if the analysis threshold is triggered. The PSD increment is the amount of pollution an area is allowed to increase. PSD increments prevent the air quality in clean areas from deteriorating to the level set by the NAAQS. The NAAQS is a maximum allowable concentration "ceiling." A PSD increment, on the other hand, is the maximum allowable increase in concentration that is allowed to occur above a baseline concentration for a pollutant. The increment analysis reflects the project's modeling demonstration against fixed increments which cannot be exceeded. The PSD increment has not changed since the NORI was published in 2021.

COMMENT 8: Public Meeting

Colin Drew Hunter commented that an in-person public meeting should be granted instead of hiding behind computers because of COVID-19, further stating that the public has the right to publicly face the Applicant and TCEQ. Bonita L. Overbey questioned the location of the public meeting and asks why it could not be held at the church located near the proposed project site. Liberty Johnson commented that the public meeting had too much technical jargon that left the community with more questions that the Applicant and TCEQ were not in a position to answer. Sarah Myrick expressed concern that the TCEQ provided advice on how to get the public meeting scheduled before the $PM_{2.5}$ standard change took effect. Ray H. Purdom asks why there wasn't any type of illustration or drawings at the public meeting to show what the proposed plant will look like, such as an architecture type plan, general layout of the facility, map to show the location and plant size, or any existing photos.

Deirdre Diamond expressed concern that an individual was removed from the public meeting, specifically requesting another public meeting where 'the right to free speech is protected and the Texas Bill of Rights is not violated by removing affected parties,' further stating that removal of the individual violates the open meetings act. Ms. Diamond expressed concern regarding the length of the public meeting, stating that it was too limited.

Jeremy Devore expressed concern regarding the hotel staff at the public meeting being unhelpful, expressed concern that no provisions were made to assist individuals with disabilities to navigate the venue or access the meeting area, and expressed concern that attendees were 'unjustly threatened with expulsion.' Mr. Devore commented that TCEQ failed to plan for logistical challenges, including the size of the venue compared to the turnout.

(Jeremy Devore, Deirdre Diamond, Colin Drew Hunter, Sarah Myrick, Bonita L. Overbey)

RESPONSE 8: Title 30 TAC § 55.154(c)(2) requires that a public meeting be held if a member of the legislature who represents the general area in which the facility is located requests a public meeting or if the TCEQ Executive Director determines that there is substantial or significant degree of public interest. A public meeting was held on March 25, 2024, at 7:00 PM at the Hilton Garden Inn Denison/Sherman/At Texoma Event Center, 5015 South U.S. 75, Denison, Texas 75020. The notice of public meeting was mailed on February 9, 2024, and an amended notice of public meeting was mailed on February 13, 2024.

The location was selected by the Applicant and agreed to by TCEQ due to the potential size of the crowd, its availability, and ability to accommodate venue requirements. 30 Texas Administrative Code § 55.154(b) requires that a meeting be held in the county where the facility is, or is proposed to be, located. Over 400 people attended the public meeting, and it was necessary that a venue was selected that would be able to safely accommodate a crowd of this size.

TCEQ staff strives to explain technical issues in as simple terms as possible. Additionally, individuals had the opportunity to provide additional public comment requesting clarification or asking additional questions after the close of the public meeting. The public comment period closed on August 14, 2024, three and a half months after the close of the meeting.

The Applicant was required to provide an additional protectiveness demonstration showing compliance with the revised $PM_{2.5}$ NAAQS standard. After TCEQ reviewed the demonstration, the Applicant was then required to publish additional notice and make the revised protectiveness demonstration available for public review and comment. TCEQ elected to proceed with scheduling a public meeting following the initial declaration of technical completeness rather than wait for the new $PM_{2.5}$ standard implementation given uncertainties about the effective dates and nature of the standard.

There is no requirement in state rules or statute for an Applicant to post printed illustrations or drawings at the public meeting. This information was available in copies of the application which were required to be made available during the public comment period.

Individuals who are disruptive, abusive, or who are considered a security risk can and will be removed from public meetings. The purpose of a public meeting is to take public comments. These comments can be submitted online during the comment period and are not considered differently than those which are given at a public meeting. Similarly, a public meeting cannot last indefinitely, and its length is often constrained by the venue. Everyone that wished to make a public comment on the record was provided the opportunity at the public meeting.

There are not fixed requirements in TCEQ rules relating to venue for a public meeting, other than that the meeting must be held in county in which the proposed plant will be located. TCEQ staff in the Office of the Chief Clerk provide applicants with requirements that must be met by the selected venue, including compliance with the American with Disabilities Act, and a size necessary to accommodate the number of people expected at a meeting. During the time before the start of the meeting as people were coming in, it was decided that more seating was necessary, and additional chairs were provided. Most people were able to find seating at the venue. Applicants are instructed to select a venue of suitable size is based on the number of comments received.

COMMENT 9: Access to Permit Documents

Deirdre Diamond asks for a copy of the permit applications sent to her directly via e-mail.

(Deirdre Diamond)

RESPONSE 9: Title 30 TAC § 39.405 requires the Applicant to provide copies of the application and the Executive Director's preliminary decision at a public place in the county in which the facility is located or proposed to be located. The rules also require the public have an opportunity to review and copy these materials. In addition, the application, including any subsequent revisions to the application, must be available for review for the duration of the comment period. The Applicant represented that the application was made available at the Howe Community Library, 315 South Collins Freeway, Howe, Grayson County, Texas. In addition, a copy of the application was also available at the TCEQ Dallas/Fort Worth Regional Office and the TCEQ Central Office. The comment period closed on August 14, 2024.

The TCEQ is committed to upholding the Public Information Act (PIA) and ensuring public access to its records. All TCEQ records are available for public viewing unless one of the exceptions to disclosure listed in the PIA Applies. Please see https://www.tceq.texas.gov/agency/data/records-services/reqinfo.html for more information regarding Public Information Requests.

Beginning in July 2024, for applications administratively complete after June 1, TCEQ has posted administratively and technically complete applications on the agency website, and in the future, members of the public will be able to download these applications from this site. That was not available for this permit application.

COMMENT 10: Application Representations / Permit Review

Commenters question the representations made in the application, stating that there are numerous inaccuracies and misrepresentations. Commenters are concerned that the Applicant is using misinformation to circumvent proper processes and appear to be polluting less or more compliant than they actually will be. Commenters expressed concern that the Applicant is not being transparent about their application representations. Commenters expressed general concern regarding the TCEQ air permitting process. Commenters expressed concern that the application did not identify all potential sources of emissions. Wendy Smith expressed concern that the permit application did not include an authorized signature. Duncan C. Norton expressed concern that the application materials do not demonstrate compliance with 30 TAC § 116.11. David Smith questioned if the application followed EPA standards.

Commenters expressed concern that the Applicant and consultant received help from the TCEQ to correct mistakes made in the application. Commenters expressed concern that an entirely new permit application was submitted, stating this was used to circumvent all prior public comments.

Additional Impacts Analysis

Commenters are concerned that the Applicant claimed the proposed plant will not result in an increase of additional heavy industry businesses, including concrete plants, stating that the claim is most likely false.

Small Business Classification and Number of Employees

David Smith questioned the application representation of the company having fewer than 100 employees.

GHG Permit Number

Janice Akins expressed confusion as to why the title page of the application did not list the GHG permit number, while the 'special conditions' section did.

(Group A, Janice Akins, Art Arthur, Jeremiah D. Broyles, Tiffany Broyles, Art Clayton, James Matt Cooper, Camryn Craddock, Cassady A. Craddock, Linda Carol Crain, Bruce W. Dawsey, Bruce Dawsey, Jeremy Q. Devore, Jeremy W. Devore, Jeremy Devore, Deirdre Diamond, Judy Searcy Dryden, Judith S. Dryden, Jesse Farrer, Harold C. Foster, Kenneth Griffin, Austin Grooms, Chloe Grooms, Matt Hardenburg, Lisa Hejny, Moses Hejny, Amy Hoffman-Shehan, Robin A. Horner, Laura T. Hunt, Phyllis D. James, Suzanna Dryden Jensen, William Landrum, Crystal Lawson, Jim Lucas, Trudy Lucas, Shelley Luther, Brian Mai, Jost Marr, Josh Marr, Davida Miorin, Angela Moreau, Jason Morin, Duncan C. Norton, Jeff Overstreet, Delfina Prisock, Kathy Raner, Justin Neal Raner, Russell Rutherford, Bradley J. Schnitker, Marci Schnitker, David Smith, Wendy Smith, Mark Vodry, Kimberly Vodry, Jay Voto, Jeff Whitmire, Kevin Wilson, Dorothy Schmoker)

RESPONSE 10: The TCAA provides the TCEQ with jurisdiction over air quality permitting in Texas. The Executive Director's staff conducts both an administrative and technical review of all applications received by the agency. The first step of the application review process is an administrative review which verifies the following:

- The correct application was submitted;
- The application and any associated forms have been signed by the appropriate Responsible Official;
- The company is an entity legally entitled to do business in Texas;
- The information is accurately recorded in the TCEQ's Central Registry;
- The appropriate application fee was received;
- The mailing addresses for the company and site are USPS validated; and
- There are no delinquent fees owed by the company.

Additionally, the administrative reviewer completes the draft first public notice package. Once a project is declared administratively complete, the application and the first notice package (Notice of Receipt of Application and Intent to Obtain Air Permit - NORI) are made available for public review. The air quality permit application then undergoes a technical review. During the technical review, the permit reviewer evaluates the following:

- All sources of regulated air contaminants at the proposed facility have been properly identified;
- Appropriate controls have been proposed for each emission source, including Best Available Control Technology (BACT) at a minimum;
- Emission calculations have been completed correctly using approved methodology and appropriate emission factors;
- Proposed emissions meet applicable state and federal requirements to be considered protective (in this case done through the use of air dispersion modeling, or an AQA);
- Compliance history for the site and the operator; and
- Public notice requirements are fulfilled.

Once all emission rates have been verified, the draft permit is created, and the application is deemed technically complete. The draft permit includes a Maximum Allowable Emissions Rate Table (MAERT), which limits the quantity of emissions an applicant may emit into the atmosphere. The emissions tabulated in the MAERT are also used as the input for the air dispersion modeling evaluation to determine if any adverse effects to public health, welfare, or physical property are expected to result from a facility's proposed emissions. The draft permit also includes the operational representations, which are documented in the draft Special Conditions and are the basis upon which the emissions were determined. If the Executive Director determines that the permit meets all applicable rules and regulations, the Executive Director then makes a preliminary decision recommending that the permit be issued. In other words, the Executive Director's preliminary decision indicates that the technical review is complete.

In addition, an applicant is bound by its representations in the application and those representations become an enforceable part of the permit, including production rates, authorized emission rates, and equipment. If the Applicant deviates from the representations made in the application, on which the permit was developed, the Applicant may be subject to enforcement action.

Application Representations

The Air Permits Division and other applicable TCEQ staff have conducted a thorough review of this permit application to ensure it meets the requirements of all applicable state and federal standards. As stated above, an applicant is bound by its representations in the application and those representations become an enforceable part of the permit, including production rates, authorized emission rates, and equipment. If the Applicant deviates from the representations made in the application, on which the permit was developed, the Applicant may be subject to enforcement action.

TCEQ Deficiencies, Mistake Corrections, and New Application Concerns

During the review process, the reviewer can and does often state expectations, suggest revisions, or state the utility of aspects such as more stringent control device requirements. The technical review ensures that the application and representation comply with state and federal law, in addition to TCEQ rules and requirements. Permit applications are routinely updated during the review process, and the application is not considered static. Updates the application do not invalidate prior public comments, though they can result in changes to how the comments are responded to later on in the process. All timely comments received on the Application will be addressed in this RTC.

Additional Impacts Analysis

The Applicant performed an Additional Impacts Analysis as part of the PSD air quality analysis. The analysis includes the aspect of associated growth. Associated growth is defined by the EPA as industrial, commercial, and residential growth that will occur in the area due to the source. The applicant conducted a growth analysis and determined that population in the plant area will not significantly increase as a result of the proposed project. The amount of projected residential growth depends on the size of the work force, the number of new employees, and the availability of housing in the area. Given consideration of these aspects, the conclusion that significant growth of population will not occur in Grayson County and nearby counties due to construction of this facility was considered acceptable.

Small Business Classification and Number of Employees

The question in the PI-1 relating to the number of employees and gross receipts is part of a series of questions to determine whether a company qualifies as a small business. If a company qualifies as a small business and is a minor source, then they are not required to publish Example B. In this case the answer for this new company is irrelevant because the emissions are greater than the major source threshold. Therefore, the small business exemption from publishing Example B cannot be claimed regardless of the number of employees.

GHG Permit Number

Permit numbers are included on a number of documents issued by TCEQ. After an applicant submits an initial permit application, permit numbers are assigned. These are included on relevant official documents when the final permit is issued. There is no requirement for an applicant to include all of the permit numbers on documents that they submit.

COMMENT 11: Area Map

Commenters state that Highway 902 was mislabeled and should be represented as Farm-to-Market Road 902. Commenters express concern that the map only shows 3,000 feet bordering the property and state that several residences and schools are missing from the area map representation. Commenters further state that ignoring individual residences is a ploy to circumvent further investigation from the TCEQ. Commenters are concerned that the provided area map did not reflect nearby food supply businesses or the nearby airport. Duncan C. Norton expressed concern that the provided area map did not include representations of a nearby rural airport, further stating that the location is not compatible with surrounding land use and does not comply with TCEQ distance limitation rules. Judy Searcy Dryden expressed concern that the application represented an incorrect address for the plant location, stating it does not exist. Ms. Dryden also requests that a 5,000-foot radius be considered in the map, along with the associated mine/quarry and its data.

(Group A, Jeremy Devore, Jeremy Q. Devore, Judy Searcy Dryden, Chloe Grooms, Joshua Grooms, Suzanna Dryden Jensen, Duncan C. Norton, Jeff Overstreet, Kathy Raner, Neal Raner, Justin Neal Raner, Russell Rutherford, Marci Schnitker, David Smith, Wendy Smith, Mark Vodry, Kimberly Vodry)

RESPONSE 11: A farm to market road is a form of highway. Therefore, either the FM label or the use of the term Highway was considered acceptable in describing where the facility would be located. FM 902 or Highway 902 is the only road in Dorchester with that number associated. It was evident from the comments submitted that people are aware of the location of the proposed facility.

An area map must be submitted with an NSR permit application. The area map must include a true north arrow, accurate scale, the entire plant property, the location of the property relative to prominent geographical features, and a 3,000-foot radius for scale reference purposes. There is no requirement to label food supply businesses or aerodromes. The area map is a legacy requirement from when reviewers lacked easy access to computerized mapping. It not used in any sort of analysis. The documents submitted with the application and the supplemental use of software-based mapping tools were sufficient to allow the permit reviewer to confirm that the representations provided were accurate. The air dispersion modeling does not in any way involve the area map which is submitted with the application. The property line includes the area associated with the quarry. There are no distance limitations in applicable state or federal rules or laws relating to cement kilns.

COMMENT 12: Emission Rates and Calculations

Commenters questioned the accuracy and methodology for determining the emission rates for the proposed project. Duncan C. Norton expressed concern that the application materials do not demonstrate that the emissions calculations are correct and based on appropriate scientific methodology. Crystal Lawson commented that calculations are from 2021 and asks if the calculations have been updated to reflect 2023 or 2024 calculation methodologies and air quality standards. Janice Akins questioned the conservativeness of the represented emissions calculations.

(Janice Akins, Crystal Lawson, Duncan C. Norton)

RESPONSE 12: Emissions from this facility were determined by the use of EPA's Compilation of Air Pollutant Emission Factors, AP-42 Manual (AP-42 Section 1.4 Tables 1.4-1 and 1.4.2 (July 1998) and AP-42, 13.2.4 "Aggregate Handling and Storage Piles"); outlet grain loading based calculations, mass balance equations, federal standards (NSPS Subpart F, MACT Subpart LLL), TCEQ APDG 6422 Fugitive Guidance, and a BACT limitation basis. Greenhouse gas emissions were calculated using equation A-1 from 40 CFR Part 98, Subpart A. Emission rates are calculated using conservative emission factors and methodology. The TCEQ ensures the conservative nature of these calculations by evaluating each emission point at the maximum material throughput on both an hourly and an annual basis. The analysis also conservatively assumed the operating schedule of facilities or activities at the site as 24-hours per day. All of the methodologies utilized represent current practices.

The Applicant represented the appropriate methodologies to control and minimize emissions and utilized corresponding control efficiencies when calculating the emission rates. As provided in 30 TAC § 116.116(a), the Applicant is bound by these representations, including the represented performance characteristics of the control equipment. In addition, the permit holder must operate within the limits of the permit, including the emission limits as listed in the MAERT.

COMMENT 13: Proximity to Affected States, Tribal Nations, Class I Areas, and Notification Requirements

Commenters expressed concern that the Applicant represented the proposed plant will be located further than 100 kilometers from an affected state, tribal nation, or Class I Area. Commenters expressed concern that the Applicant has not notified or considered the affected States, tribal nations, or federal land managers with regard to the proposed project. Commenters ask that consideration be given to the Hagerman Wildlife Refuge and its future potential to be designated as a Type 1 refuge.

(Janice Akins, Paula A. Cavender, Shane Cavender, Cassady A. Craddock, Bruce Dawsey, Jeremy Q. Devore, Jeremy Devore, Chloe Grooms, Joshua Grooms, Moses Hejny, Suzanna Dryden Jensen, Josh Marr, Jost Marr, Jeff Overstreet, Emily Powell, Kathy Raner, Justin Neal Raner, Russell Rutherford, Bradley J. Schnitker, Marci Schnitker, David Smith, Wendy Smith, Mark Vodry, Kimberly Vodry)

RESPONSE 13: Class 1 federal lands include areas such as national parks, national wilderness areas, and national monuments. These areas are granted special air quality protections under Section 162(a) of the federal Clean Air Act.

The applicant performed an Additional Impacts Analysis as part of the PSD AQA. The ADMT evaluated predicted concentrations from the proposed project to determine if emissions could adversely affect a Class I area. The nearest Class I area, Wichita Mountains Wilderness, is located approximately 225 kilometers (km) from the proposed site.

The H_2SO_4 24-hr maximum predicted concentration of 7 μg/m³ occurred approximately 243 meters from the property line towards the west. The H_2SO_4 24-hr maximum predicted concentration occurring at the edge of the receptor grid, 10.6 km from the proposed sources, in the direction of the Wichita Mountains Wilderness Class I area is 0.526 μg/m³. The Wichita Mountains Wilderness Class I area is an additional 214.4 km from the edge of the receptor grid. Therefore, emissions of H_2SO_4 from the proposed project are not expected to adversely affect the Wichita Mountains Wilderness Class I area.

The predicted concentrations of PM_{10}, $PM_{2.5}$, NO_2, and SO_2 for all averaging times, are all less than de minimis levels at a distance of 7.3 km from the proposed sources in the direction of the Wichita Mountains Wilderness Class I area. The Wichita Mountains Wilderness Class I area is an additional 217.7 km from the location where the predicted concentrations of PM_{10}, $PM_{2.5}$, NO_2, and SO_2 for all averaging times are less than de minimis. Therefore, emissions from the proposed project are not expected to adversely affect the Wichita Mountains Wilderness Class I area.

TCEQ Form PI-1 provides guidance for informational purposes only on where to submit copies of the application and instructs applicants to retain records of such. TCEQ does not have the ability to determine if, for instance, other state agencies or tribal authorities have received copies of applications, nor does it verify such as part of the permit review process, and the form itself states that no data is required to be submitted as verification of this.

The Clean Air Act designated 158 areas in the United States as mandatory federal Class I areas when it was amended in 1977. These areas include international parks, national wilderness areas larger than 5,000 acres, national memorial parks larger than 5,000 acres and national parks larger than 6,000 acres. This classification did not include National Wildlife Refuges like Hagerman National Wildlife Refuge.

COMMENT 14: Fuel Options and Raw Materials

Commenters are concerned about the proposed fuel options represented in the application. Commenters are concerned about the burning of plastic waste, medical waste, industrial waste, and coal as fuel. Commenters ask if ecofriendly fuel options or renewable energy fuel alternatives were considered. Commenters expressed concern that the Applicant may use fuels other than the natural gas that was represented in the permit application. Commenters question how the Applicant represented use of natural gas if there are no natural gas lines near the proposed facility. Deirdre Diamond asks what type of natural gas is being used, who supplies it, and asks how much can be burned as allowed by the permit. Robert E. Dryden expressed concern about the burning of plastic waste as fuel. David Smith asks what raw materials testing has been done to estimate represented mercury and lead emissions. Judy Searcy Dryden expressed concern that the Applicant will have to utilize alternative fossil fuels, such as coal, to achieve the high temperatures required for cement production, which would be more destructive to the surrounding area.

(Group A, Ashley Beck, Francis Beck, Deirdre Diamond, Judy Searcy Dryden, Robert E. Dryden, Rex Glendenning, Donald E. Godwin, Suzanna Dryden Jensen, Julie Lanicek, Garrett McCown, Amy Meyer, Mitaj Nathwani)

RESPONSE 14: The draft permit limits fuels to natural gas containing no more than 5 grains of total sulfur per 100 dry standard cubic feet (dscf). Plastic waste is not proposed as a fuel. TCEQ does not have jurisdiction to require applicants to consider renewable energy fuel options. Natural gas is capable of generating the heat needed for the cement kiln. Natural gas is a mixture of hydrocarbons, primarily methane. There are no "types" of natural gas, but the TCEQ limits sulfur content which can be present in the fuel. Emissions of lead and mercury are related to raw materials used by the facility as feedstock to make cement, not fuel materials. The Applicant will be required to monitor emissions of mercury and lead emitted by the kiln to demonstrate compliance with the permit limitations and federal limitations. The review of the permit application does not include an analysis of where or how the applicant intends to acquire the fuel used in the plant.

COMMENT 15: Best Available Control Technology

General BACT Questions

Commenters questioned the best available control technology (BACT) proposed in the application. Matthew Muniz asked for a list of all expected outputs and controls represented in the application, along with examples of their effectiveness. Lisa Hejny asks if there is a detailed plan to utilize equipment that is truly BACT and produces a maximum reduction of all pollution and emissions. Duncan C. Norton expressed concern that the Application materials do not demonstrate that the site will have adequate air pollution control measures and will not utilize BACT. Lari Alexis Taylor-Barker asks if the emissions proposed appear to be on par with other cement plants, asks for details as to how pollution will be reduced or lowered, and asks how the carbon footprint can be reduced with outdated technologies. Crystal Lawson asks if BACT means best available technology based on the Applicants' finances, or if it is based on industry standards. Ms. Lawson further asks what the Applicant considers as BACT and if this will change if their finances change.

Opacity

Jeremy Devore questioned how the Applicant will meet the five percent opacity requirement.

Thermal Oxidizer

David Smith requests that the applicant be required to utilize a Thermal Oxidizer to control emissions.

Use of Enclosures

Mr. Smith questions how a two- or three-sided shed is able to have 85 percent or more containment and asks what is done with the slurry from the foggers that collect a portion of the dust and pollutants.

Cynthia J. Kaleri commented that EPA requests clarification on the following items with regard to use of the "three-tiered" approach as opposed to EPA's "Top-Down" methodology for determining BACT:

- Kiln System BACT Analysis for Carbon Monoxide: Ms. Kaleri requests that TCEQ explain the rationale for accepting the Applicant's overall CO BACT proposal as at least equivalent to what has been accepted in recent permit reviews for the same industry and explain how such a proposal is based on the maximum degree of reduction achievable accounting for technical feasibility and economic reasonableness. Ms. Kaleri commented that the EPA was unable to identify the TCEQs analysis of any site-specific differences or the effects of these differences on the achievability of lower CO BACT limitations imposed in recent permit reviews. Ms. Kaleri requests a discussion which explicitly identifies any compelling technical differences between the Applicant's proposed processes and the processes of other plants within the same industry, and any technical considerations and supporting documentation reviewed that impacted TCEQ's

decision to support the current CO BACT proposal as opposed to the other comparable BACT determinations (e.g., feed material organic carbon content, kiln design, infeasibility of add-on controls (RTO), collateral NO_x emissions, etc.). Finally, Ms. Kaleri requests that if any of the CO BACT determinations in recent permit reviews were determined to be irrelevant because of the associated limits accepted as BACT have not yet been demonstrated in practice, or that TCEQ believes these lower limits represent "beyond BACT" determinations, that this be included in the explanation as applicable.

- Kiln System BACT Analysis for Ammonia: Ms. Kaleri expressed concern that the application and TCEQ's Preliminary Determination Summary (PDS) simply state that an ammonia emission rate of 35 ppmv at 7 percent oxygen on a 30-day rolling average represents BACT, stating that no information on the BACT determinations for the same process and/or industry was identified within the administrative record. Ms. Kaleri requests that the TCEQ explain the rationale for accepting the Applicant's overall ammonia BACT proposal as at least equivalent to what has been accepted in recent permit reviews for the same industry.

- Kiln System BACT Analysis for Particulate Matter: Ms. Kaleri expressed concern that neither the permit application for the TCEQ's PDS explain the basis for the selection of the proposed condensable PM limitation, how the proposed BACT determination is comparable, or the primary drivers in condensable PM limit variability from other similar sources, citing other kiln BACT determinations provided in the RACT/BACT/LAER Clearinghouse (RBLC) which appear to be based upon an outlet grain loading basis, filterable PM per ton basis, or total PM basis. Ms. Kaleri requests that TCEQ explicitly identify the origin of the proposed emission rate (e.g., basis of emission factor, similar source stack testing, etc.) and the rationale behind determining representativeness of the proposed condensable PM emissions limitation.

(Jeremy Devore, Chloe Grooms, Lisa Hejny, Suzanna Dryden. Jensen, Cynthia J. Kaleri, William Landrum, Crystal Lawson, Matthew Muniz, Duncan C. Norton, Jeff Overstreet, Russell Rutherford, David Smith, Lari Alexis Taylor-Baker, Mark Vodry, Kimberly Vodry, David G. Sileven)

RESPONSE 15: Best available control technology (BACT) is an air pollution control method for a new or modified facility that through experience and research, has proven to be operational, obtainable, capable of reducing or eliminating emissions from the facility, and is considered technically practical and economically reasonable for the facility. BACT may be numerical limitations, the use of an add-on control technology, design considerations, the implementation of work practices, or operational limitations. The Applicant has represented in the permit application that BACT will be used for the proposed new and modified sources.

The contaminants authorized by this permitting action will be carbon monoxide, hazardous air pollutants, sulfur dioxides, nitrogen oxides, organic compounds, particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less, sulfur dioxide, sulfuric acid, lead, and greenhouse gases. The primary control measures applied to this facility are as follows in the below table:

Table 9: Best Available Control Technology

Source Name	EPN	Best Available Control Technology Description
Kiln System	21-SK-230	**PM, PM_{10}, $PM_{2.5}$:** Add on control: Baghouse at 0.002 grains per dry standard cubic foot (gr/dscf). 5% opacity. *This exceeds state and PSD BACT.* PM, PM_{10}, $PM_{2.5}$ (filterable): 0.02 lbs. PM per ton of clinker on a 1-hour average and a rolling 12-month average PM, PM_{10}, $PM_{2.5}$ (condensable): 0.28 lbs. PM per ton of clinker on a 1-hour average, 30-day rolling average, and a rolling 12-month average. **CO:** No add on controls. Proper design and operation. BACT determination based on other kilns. 9.0 lbs of CO/ton of clinker on a 1-hour average and 30-day rolling average. 3.0 lbs. of CO/ton of clinker on a rolling 12-month average. CO emission rates are in part driven by the composition and concentration of organic materials in the kiln feed and vary regionally dependent on the nature of the quarried limestone. The proposed rate is consistent with other Texas kilns using limestone from this general region, though this can vary by quarry. TCEQ was unable to locate any cement kilns using add on controls for specifically for CO control. Good combustion practices with proper design and operation were determined as BACT.

Source Name	EPN	Best Available Control Technology Description
		NO_x: Add on and other control: Selective Catalytic Reduction (SCR) system or combination of SCR and Selective Non-Catalytic Reduction (SNCR) system, staged combustion, low NO_x burners, good combustion practices. Notably the proposed NO_x rate greatly exceeds RBLC PSD and state BACT requirements, which is typically 1.5 lb/ton of clinker compared to the 0.54 lb/ton of clinker proposed. 0.54 lbs. of NO_x per ton of clinker on a 1-hour rolling average, 30-day rolling average, and 12 month rolling average. **SO_2:** Add on and other control: Scrubber with a represented control efficiency of 90%, the alkali absorption inherent in the pre-calciner kiln, and the use of low sulfur content natural gas as fuel. 0.60 lbs. SO_2 per ton of clinker on a 1-hour rolling average, 0.40 lb per ton of clinker on a 30-day and 12 month rolling average. **VOC:** No add on controls. Good combustion practices. 24 ppmv at 7% O_2 for THC on a 1-hour average, 30-day rolling average, and 12 month rolling average. Note that VOC levels are related to composition and concentration of organic materials in the quarry and

Source Name	EPN	Best Available Control Technology Description
		BACT determinations are driven by this. **O-HAP** No add on controls. 12 ppmvd total organic HAP on a 30-day rolling average and 12 month rolling average. Note that this rate is based on preliminary organic information from the quarry. **Dioxins and Furans** No add on controls. 0.20 nanograms per dry standard cubic meter (TEQ), corrected to 7 % O_2 on a 30-day rolling average and 12 month rolling average. **H_2SO_4:** Add on and other control: scrubber. The control efficiency of the scrubber will be specified in an as-built modification. 1.10 lbs. per ton of clinker on an hourly basis when the in-line raw mill and scrubber are not operating. 0.11 lbs. per ton of clinker on a 12-month rolling average basis. **HCl:** No add on controls. 3 ppmvd corrected to 7% O_2 on a 30-day rolling average and 12 month rolling average. **Hg** No add on controls. 0.000021 lb/ton of clinker on a 30-day rolling average and 12 month rolling average.

		Pb 7.50E-05 lb/ton of clinker on a 30-day rolling average and 12 month rolling average. **GHG:** No add on controls. Proper design and operation. 0.92 lbs. per ton of clinker on a 30-day rolling average. **NH_3 (SCR):** No add on controls. Operation in a manner to minimize ammonia slip. 35 ppmv at 7% O_2 on a 30-day rolling average. This rate is consistent with or better than other cement kilns which were reviewed. **MSS:** The Applicant has represented the following in relation to kiln startup and shutdown: The SCR will be operating at all times when fuel is being fired in the kiln/pre-heater except during kiln heat-ups at the beginning of startup. During these times, no raw materials will be fed into the kiln. During a cold startup after major refractory work, it will take about 36 hours to heat up the kiln. This operation is expected to only occur once per year. During the kiln heat-up process, NO_x emissions are estimated to range from 3 to 12 lb/hr based the AP-42 Table 1.4-1 NO_x emission factor for a large (>100 MMBtu/hr) boiler equipped with a low NO_x burner*. This NO_x emission rate range is well below the proposed MAERT NO_x limit for normal kiln operations of 75.34 lb/hr, which is less than the kiln emission rate of 143.7 lb/hr evaluated in the AQA submitted along with the initial application

Source Name	EPN	Best Available Control Technology Description
		materials. During these kiln heat-up periods, supplemental air will be added to ensure that any combustion emissions are being exhausted. Although stack flow and temperature during these kiln heat-up periods have not been quantified, any reduction in dispersion due to stack flow and/or temperature is not expected to offset the ~13X lower NO_x emissions expected during planned kiln MSS periods shown in the example below. In addition, the total planned kiln MSS operating hours per year are expected to be not more than 72 hr/yr, which would qualify as an intermittent source under TCEQ and EPA modeling guidance. The expected planned MSS hours are listed below: Case 1 - Kiln heat-up from cold after major refractory work - estimated to occur once per year at main maintenance stoppage (36 hrs per event) Case 2 - Kiln heat-up from cold after maintenance work w/o refractory work - estimated to occur once per year at secondary maintenance stoppage (12 hrs per event) Case 3 - Kiln heat-up from short stoppage for secondary maintenance work not requiring a full cool-down - estimated to occur about four times per year (6 hrs per event) Example Calculation - Maximum heat input during any warm-up case is not expected to exceed 81 MMBtu/hr. Therefore, the maximum

Source Name	EPN	Best Available Control Technology Description
		NO_x emissions during warm-up periods are estimated as follows: 81 MMBtu/hr * 140 lb $NO_x/10^6$ scf / 1020 Btu/scf = 11.15 lb/hr NO_x * It should be noted that the factor used for the qualitative comparison above is conservative in that it reflects a low NO_x burner for a large (>100 MMBtu/hr) combustion unit; however, given that the kiln burner is a low NO_x burner rated at less than 100 MMBtu/hr (peak heat input during a start-up is expected to be approximately 81 MMBtu/hr), the NO_x emissions from the kiln burner during start-up could be as much as 36X lower than the emissions modeled in the AQA.
Finish Mill and Air Heater	51-SK-250	15.9 MMBtu/hr heater: **NO_x:** 0.01 lb/MMBtu based on the higher heating value of the fuel and the use of a low NO_x burner. **PM, PM_{10}, $PM_{2.5}$:** Add on control: Baghouse at 0.005 gr/dscf. 5% opacity. This exceeds published TCEQ BACT of 0.01 gr/dscf.
Crusher, Milling, Raw Material Handling, and Product Handling	BF-Series EPNs (Numerous)	**PM, PM_{10}, $PM_{2.5}$:** Add on control: Baghouse at 0.0025 gr/dscf. 5% opacity.
Limestone, Gypsum, High Grade Limestone, and Sand Stockpiles	LS STKPL, ADD STKPL	**PM, PM_{10}, $PM_{2.5}$:** 90% reduction. Stockpiles will be required to be stored within a fully enclosed building.
Ammonia handling	NH3FUG	**NH_3:** AVO checks once per shift (28AVO). A control efficiency of 93-97% - dependent on the piping component type.

Source Name	EPN	Best Available Control Technology Description
Emergency Generator Engine	EG-1	**Products of combustion**: Limited to pipeline quality natural gas. Subject to 40 CFR Part 60 JJJJ and Part 63 ZZZZ. Operation is limited to 100 hours per year. A non-resettable hour meter is required in the Special Conditions.
Raw Material Loading	RR_MH, TRK_MH	**PM, PM_{10}, $PM_{2.5}$:** 85% reduction. Partial enclosure defined as consisting of two sided (rail loading) or three-sided walls (truck loading) with fogging nozzles. Dustless telescopic spouts are required be used for loading trucks or rail from bins or silos. 85% is conservative given the additional controls and aspiration on this system.
Raw Material Handling (Crusher Building)	LSCRSHBD_MH	**PM, PM_{10}, $PM_{2.5}$:** 85% reduction. The actual crusher is controlled by a baghouse (see BF series BACT discussion), and this EPN is the dump into the crushing system. Partial enclosure is defined as three-sided walls with fogging nozzles. The operation is represented as taking place within the crusher's building, and the crusher loading hopper will be located below-grade to accommodate trucks dumping mined limestone. Therefore, 85% is expected to be a conservative control efficiency.
Silo Loading	N/A	Dustless telescoping spouts are required for these. This removes the units as potential fugitive dust sources, and emissions would be associated with the baghouses/dust collectors which control these units.

Source Name	EPN	Best Available Control Technology Description
ILE MSS Activities	MSS FUG	**Refractory Removal:** **PM, PM_{10}, $PM_{2.5}$:** Refractory (a bricklike material) is removed as needed for repairs or replacement. Operations taking place inside the kiln or cooler will be enclosed by nature, resulting in a 90% reduction in emissions. Drop into trucks was accounted for with no controls. **Vacuum Truck Loading and Unloading:** **PM, PM_{10}, $PM_{2.5}$:** Partial enclosure will be utilized for an 85% reduction on loadouts. The trucks have a filter with an outlet grain loading of 0.01 gr/dscf for loading operations. **CEMS Calibration** **NO_x, CO, THC, SO_2** Emissions are due to the release of calibration gas from the feed analyzers and CEMS unit. No add on controls.
Housekeeping	(non-regulated facilities – nuisance dust prevention)	Plant roads are required to be paved and cleaned, as necessary, to control the emission of dust to the minimum level possible under existing conditions. Haul roads are required to be sprinkled with water and/or chemicals, as necessary, to maintain compliance with all applicable TCEQ rules and regulations. Blasting is forbidden from being utilized on site to acquire raw materials for cement production. A street sweeper and other mobile equipment is required to pick up debris from the plant roads. The street sweeper will be a full-sized truck which can be driven to the

Source Name	EPN	Best Available Control Technology Description
		mined-out quarry to dispose of the debris collected.

The permit reviewer evaluated the proposed BACT and confirmed that all sources meet or exceed state and PSD BACT.

The permit reviewer evaluated this information, including the emission reduction options available for the process/industry. While technical practicability is established through the demonstrated success of an emission reduction option based on previous use and/or an engineering evaluation of a new technology, economic reasonableness is determined by the cost-effectiveness of controlling emissions (expressed as dollars per ton of pollutant reduced) and does not consider the effect of emission reduction costs on corporate economics. Based on this analysis, no additional controls are required for any of the proposed facilities. In many cases the Applicant exceeded BACT.

Nonattainment permits must include Lowest Achievable Emission Rate (LAER), as opposed to BACT. The proposed plant is located in Grayson County, which is currently designated as being in attainment or unclassifiable for all pollutants; therefore, nonattainment review and LAER requirements are not applicable to the proposed project.

Kiln System BACT Analysis for Carbon Monoxide:

CO emission rates are in part driven by the composition and concentration of organic materials in the kiln feed and vary regionally dependent on the nature of the quarried limestone. The proposed rate is consistent with other Texas kilns using limestone from this general region, though this can vary by the geologic makeup of individual quarries. TCEQ was unable to locate any cement kilns using add on controls specifically for CO control. Because of regional variability with cement kiln raw materials, good combustion practices with proper design and operation were determined as BACT.

Kiln System BACT Analysis for Ammonia:

TCEQ reviewed ammonia slip concentrations for all cement kilns permitted in Texas, as well as the RBLC database and found none with a lower ammonia slip concentration. Accordingly, 35ppm was accepted as BACT.

Kiln System BACT Analysis for Particulate Matter:

PSD and state BACT for cement kilns focuses on the filterable PM limit, due to the fact that federal standards in 40 CFR Part 60 (NSPS) Subpart F and 40 CFR 63 (NESHAPS) Subpart LLL solely limit filterable PM to 0.02 lbs of PM per ton of clinker. Condensables can be affected by aspects such as fuel sources and organics in the raw materials, and many of the individual condensable pollutants are regulated by their own state permit and federal limitations (for instance, sulfur compounds). Similar to CO emissions, organics in the raw materials can affect this rate on a per-site basis. Calculations and limits were based on another cement kiln located in Texas rather than EPA AP-42 factors for this reason. The Applicant proposed a condensable limit of 0.28 lbs of PM per ton of clinker on a 1-hour average, 30-day rolling average, and a rolling 12-month average. This was accepted as BACT.

COMMENT 16: Questions Regarding the Draft Permit

Duncan C. Norton expressed concern that the draft permit does not reflect restrictions that were represented in the application. David Smith asks if a truck wash would be required for outbound cement tanker trucks to keep fugitive cement dust off of local roads, buildings, and vehicles. David Smith commented that he rejects the special condition that allows visible fugitive emissions across property lines, stating that this will be a nuisance and a continual violation. Atul Dave commented that an initial permit should be limited to two years only, and then assessments by state agencies need to be done before issuance of a renewal of the permit.

Special Condition No. 18

David Smith expressed concern that haul roads and all other unpaved roads do not have a standard for dust control other than "compliance with rules and regulations," stating that a 95% control efficiency should be mandated for all unpaved roads as it is a standard widely used in the mining industry and should be used for the proposed plant.

Special Condition No. 27, Subpart B

David Smith expressed concern that the permit conditions allow continued operation while trying to contain or repair a leak and asks why the plant isn't required to shut down until it is fixed.

Special Condition No. 35

David Smith expressed general confusion regarding the proposed condition requiring additional testing if 2% or more production is achieved from the previous emissions compliance test, asking what the basis is, how the 10% rule can apply, asks why the maximum production rate is not set based on what is demonstrated and achieved during testing, and asks what the maximum hourly production rate is under the permit for testing purposes if testing is done in less than 24-hour intervals.

Special Condition Nos. 40, 45, 46 and 47

David Smith asks why the Finish Mill stack does not have a Continuous Emissions Monitoring System (CEMS) or Continuous Parameter Monitoring System (CPMS) for PM, NO_x, and CO emissions. Mr. Smith commented that that a six-minute visible emissions check is inadequate and asks why the permit does not contain enforceable NO_x and CO limits when it has a natural gas fired hot gas generator. Mr. Smith commented that the Finish Mill should have enforceable limits for ammonia and mercury emissions and if not limits, then the permit should include a prohibition on the use of synthetic gypsum.

(Duncan C. Norton, David Smith, Atul Dave)

RESPONSE 16: TCEQ regulates nuisance dust, and has implemented requirements relating to this, specifically the roads are required to be paved and cleaned. Haul roads are required to be sprinkled with water and/or chemicals as necessary. A street sweeper will be required to pick up debris from plant roads. As explained in Response 25, TCEQ does not have jurisdiction over blasting or quarry operations, therefore, the TCEQ rules do not require an applicant to analyze emissions resulting from quarry operations, blasting, roads, or the use of trucks in an individual permit application. The draft permit forbids the use of blasting as a nuisance dust prevention measure, and the Applicant has represented that it will not be necessary for quarrying activities.

The property line visible emission limitation and monitoring requirements found in the draft permit are based on EPA monitoring methods for fugitive emissions. In addition, an applicant is bound by its representations in the application and those representations become an enforceable part of the permit, including production rates, authorized emission rates, and equipment. If the Applicant deviates from the representations made in the application, on which the permit was developed, the Applicant may be subject to enforcement action. The permit term is 10-years, after which the applicant will have to renew the permit to continue operation. If the applicant decides to change or amend their operations during that time, the applicant would have to submit a permit amendment application which TCEQ would have to approve.

Special Condition No. 18

TCEQ cannot regulate haul roads or other unpaved roads as a facility per THSC § 382.003(6). TCEQ rules forbid nuisance dust under 30 TAC § 101.4, and therefore often implements nuisance prevention measures in permits. As previously described, the draft permit requires housekeeping measures intended to prevent nuisance dust.

Special Condition No. 27, Subpart B

Special Condition No. 27, Subpart B provides control measures and repair requirements for when an ammonia leak in the ammonia handling system associated with the NO_x reduction system occurs. A leak from the ammonia handling system could occur whether or not the system was actively supplying ammonia and would not be associated with operation of the rest of the plant. If the system was shut down completely, the leak would still occur, therefore shutting down operations would

provide no benefit for leak prevention. This Special Condition requires beginning repairs on a leak within 1 hour of detection. It prescribes best management practices for isolating, repairing, and containing the leak. Specifically, it requires isolating the leak, commencing repair or replacement of the leaking component and utilizing a leak collection/containment system to prevent the leak until repair or replacement can be made if immediate repair is not possible.

Special Condition No. 35

Early versions of this draft condition originally had a transcription error where the 10% increase second figure should have matched the previous 2% increase testing threshold in the paragraph. It was subsequently revised after new stacking test boilerplate language became available. The new language requires testing following any increase in production, though it allows for increases in production without testing if certain thresholds relating to allowable emissions are not exceeded.

Special Condition Nos. 40, 45, 46, and 47

The Finish Mill utilizes a small air heater to achieve desired temperatures for milling of the clinker into a powder. The proposed heater is 15.9 million British thermal units per hour (MMBtu/hr). This is well below the 100 MMBtu/hr rate which is the threshold for which TCEQ requires the use of a CEMS. Similarly, the small baghouse filter on the mill is below the size and use case for which TCEQ requires CPMS. Instead, pressure drop monitoring will be used to determine proper function and integrity of the filter unit. Opacity check demonstration requirements are based on methods prescribed by the EPA. The Finish Mill does not require the use of a SNCR and its ammonia injection to achieve its emission rates given its small size. Therefore, it is not a source of ammonia emissions. Additionally, unlike in a kiln, the temperatures in the mill are not sufficient to volatize any residual mercury in the clinker. Accordingly, EPA does not have standards for pollutants such as mercury from Finish Mills. Ammonia is a gas in normal conditions and gypsum and synthetic gypsum are calcium sulfate dihydrate. These minerals can contain impurities of various other minerals or metals, but concentrations are extremely low. Gypsum is a common mineral in soil and rock formations. It is used for household use, in food, water treatment, agriculture, and home construction. Accordingly, TCEQ does not require a protectiveness demonstration beyond the NAAQS, as explained in Response 1.

COMMENT 17: Compliance History

Commenters expressed concern that the Applicant does not have experience in operating a cement plant, and questions how the Applicant will comply with the permit. Anthony Dimarco asks how many plants the Applicant has operated, what the record has been for emissions within and outside of the standard operating limits, asks if these emissions have been favorable or not, and asks where to find the historical data.

(Ashley Beck, Emily Brooks, Lee Collins, Anthony Dimarco, Don Horn, Robin A. Horner, Scott Horner, Liberty Johnson, Julie Lanicek, James Stringfield, David G. Sileven, Gary Schnitker, Jennita Wingate)

RESPONSE 17: During the technical review of the permit application, a compliance history review of both the company and the site is conducted based on the criteria in 30 TAC Chapter 60. These rules may be found at the following website: https://www.tceq.texas.gov/rules/index.html.

The compliance history is reviewed for the five-year period prior to the date the permit application was received and includes multimedia compliance-related components about the site under review. These components include: enforcement orders, consent decrees, court judgments, criminal convictions, chronic excessive emissions events, investigations, notices of violations, audits and violations disclosed under the Audit Act, environmental management systems, voluntary on-site compliance assessments, voluntary pollution reduction programs, and early compliance. However, the TCEQ does not have jurisdiction to consider violations outside of the State of Texas.

A company and site may have one of the following classifications and ratings:

- High: rating below 0.10 – complies with environmental regulations extremely well;
- Satisfactory: rating 0.10 – 55.00 – generally complies with environmental regulations;
- Unsatisfactory: rating greater than 55.00 – fails to comply with a significant portion of the relevant environmental regulations.

The company rating reflects the average of the ratings for all sites the company owns in Texas. The site and company ratings are not applicable to the proposed project, as both the company and proposed facility are new. Additionally, TCEQ cannot deny a permit because a company is new, or does not have a compliance history record. *See* Response 18 regarding Compliance and Enforcement.

COMMENT 18: Compliance and Enforcement

Commenters expressed concern about how the Applicant will demonstrate compliance with the conditions of their permit. Commenters ask who will ensure compliance with the permit. Commenters asks about the consequences of violating the terms of the permit. Commenters are concerned that the Applicant can just pay a fine if they are found to be out of compliance and then be allowed to continue to operate. Carl Kalbfleisch asks if there would be a public record of the monitoring conducted at the proposed plant. Jim Schermbeck commented that the rules of the TCEQ mean nothing these days because they are not enforced.

(Faith Barrett, Ashley Beck, Francis Beck, Emily Brooks, Tiffany Broyles, Linda Carol Crain, Bruce Dawsey, Deirdre Diamond, Kathleen Dophied, Rachel Grooms, Scott Horner, Billie Charels Ingram, Liberty Johnson, Carl Kalbfleisch, Terri Langford, Crystal Lawson, Julie Lenicek, Sarah Newtown, Duncan C. Norton, Jeff Overstreet, Jim Schermbeck, Lari Alexis Taylor-Baker)

RESPONSE 19: Special conditions have been included as part of the proposed permit to ensure the Applicant can demonstrate compliance with the emission limitations set forth in the permit. Emissions will be monitored by the following methods:

All baghouses/dust collectors: Each is subject to daily pressure drop readings. All baghouse capture systems will be subject to monthly inspections to ensure that they are free of holes, cracks, or other conditions which could reduce their capture efficiency. Monthly opacity/visible emission checks are required for all baghouses. The Finish Mill Baghouse Stack (EPN 51-SK-250) will be required to have a daily visible emissions/opacity observation.

Kiln: A Continuous Parametric Monitoring System (CPMS) is required for monitoring of PM. Continuous Emissions Monitoring Systems (CEMS) are required for O_2, SO_2, CO, NO_x, THC (as a surrogate for VOC), NH_3, and Hg.

Kiln Dry Scrubbing System: Monitoring for this system will be required to be established with an as-built amendment prior to start of operations.

Ammonia fugitives**:** Audio Visual and Olfactory checks are required once every 24 hours (28AVO) and monthly property line visual emission observations are required. Stack testing will be utilized to validate kiln emission rates and monitoring.

The permit holder is also required to maintain records to demonstrate compliance. Records must be made available upon request to representatives of the TCEQ, EPA, or any local air pollution control program having jurisdiction.

As required for any major source, the Regional Office is required to perform periodic investigations of the plant. The investigation may include an inspection of the site including all equipment, control devices, monitors, and a review of all calculations and required recordkeeping. The TCEQ evaluates all complaints received. If a facility is found to be out of compliance with the terms and conditions of its permit, it will be subject to investigation and possible enforcement action. Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186.

Citizen-collected evidence may be used in such an action. *See* 30 TAC § 70.4, Enforcement Action Using Information Provided by Private Individual, for details on gathering and reporting such evidence. Under the citizen-collected evidence program, individuals can provide information on possible violations of environmental law. The information, if gathered according to agency procedures and guidelines, can be used by the TCEQ to pursue enforcement. In this program, citizens can become involved and may eventually testify at a hearing or trial concerning the violation. For additional information, see the TCEQ publication, "Do You Want to Report an Environmental Problem? Do You Have Information or Evidence?" This booklet is available in English and Spanish from the TCEQ Publications office at 512-239-0028 and may be downloaded from the agency website at http://www.tceq.texas.gov (under Publications, search for document number 278).

Violations are usually addressed through a notice of violation letter that allows the operator a specified period of time within which to correct the problem. The violation is considered resolved upon timely corrective action. A formal enforcement referral will be made if the cited problem is not timely corrected, if the violation is repeated, or if a violation is causing substantial impact to the environment or neighbors. In most cases, formal enforcement results in an agreed enforcement order including penalties and technical requirements for corrective action. Penalties are based upon the severity and duration of the violation(s). Violations are maintained on file and are included in the calculation of a facility and a person's compliance history. Compliance history ratings are considered during permit application reviews.

Records of monitoring are maintained by the permit holder and can be included in TCEQ investigations. There is no requirement that permit holders make their records available to the public.

COMMENT 19: Emergency / Evacuation / Disaster Review / Upset Event

Commenters expressed concern about the safety of the facility. Commenters ask how neighbors would be notified in the case of an accident and whether there is an evacuation plan. Commenters expressed general concern with regard to potential upset events. Commenters expressed concern that the facility would store and handle ammonia, questioning why a disaster review was not required to be submitted as part of the application. Commenters expressed concern that local firefighters and emergency response would not be able to accommodate the proposed plant in the event of an emergency. Karla McDonald commented that the City of Howe services Dorchester for fire and EMS needs, stating that they do not have the equipment or manpower to ensure proper safety of the proposed plant. Crystal Lawson expressed concern about remediation when control technologies fail.

(Janice Akins, Paula A. Cavender, Shane Cavender, Jeremy Q. Devore, Judith S. Dryden, Chloe Grooms, Joshua Grooms, Billie Ingram, Suzanna Dryden Jensen, William Landrum, Terri Langford, Karla McDonald, Steve Miller, Emily Powell, Kathy Raner, Justin Neal Raner, Russell Rutherford, Jim Schermbeck, Marci Schnitker, David Smith, Wendy Smith, Chandler Strawn, Mark Vodry, Kimberly Vodry)

RESPONSE 19: The TCEQ takes your health and environmental concerns seriously. The proposed permit meets all federal and state regulatory requirements and is protective of human health and the environment. If you have been adversely impacted by emissions from the facility, you may file a complaint with the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll free Environmental Complaints Hotline at 1-888-777-3186).

In the event of an emergency, the Local Emergency Planning Committee and the regulated entity have the primary responsibility of notifying potentially impacted parties regarding the situation. In addition, as set forth in 30 TAC § 101.201(a), regulated entities are required to notify the TCEQ regional office within 24 hours of the discovery of releases into the air and in advance of maintenance activities that could or have resulted in excess emissions.

Proposed projects which involve toxic chemicals that are known or suspected to have potential for life threatening effects upon off-facility property in the event of a disaster and involve manufacturing processes that may contribute to the potential for disastrous events, may require a disaster review for the application. A Risk Management Plan (or Disaster Review) is required for all chemicals meeting the requirements of 40 CFR Chapter 68. While the application did represent that the proposed facility will store and handle quantities of ammonia, the represented quantities were below the respective thresholds identified in 40 CFR Chapter 68.130(b); therefore, this application did not require a disaster review. See Disaster Review Fact Sheet (texas.gov) and https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-68/subpart-F.

Accordingly, the draft permit's MAERT lists the only emissions authorized to be emitted from the proposed project. The TCEQ defines an upset event as an unplanned or unanticipated occurrence or excursion of a process or operation that results in an unauthorized emissions of air contaminants. An upset event that results in unauthorized emissions from an emission point is an emissions event. If an upset occurs, the permit holder must comply with the requirements in 30 TAC § 101.201 regarding the recording and reporting of emission events. If the permit holder fails to report in accordance with 30 TAC § 101.201, the commission may initiate enforcement action for failing to report the underlying emissions event itself. Emissions from historical unplanned emission events or upsets are not included in the impact analysis as the NSR permit does not authorize upset events.

COMMENT 20: Expedited Permitting

Commenters expressed concern regarding expedite review. Commenters expressed concern that the permit application was expedited, stating that the project requires closer scrutiny. Crystal Lawson asks what allows the permit to be processed in an expedite manner.

(Crystal Lawson, Marci Schnitker)

RESPONSE 20: Any applicant may request to have their application expedited. TCEQ will expedite the review of the application if the applicant can demonstrate eligibility under 30 TAC § 101.600 and remits the appropriate fee. Expedited applications undergo the same level of scrutiny and review as non-expedited applications and follow all air permitting process requirements. Further, the public notice requirements and the duration of the public notice comment period is the same for both expedited and non-expedited projects. The economic benefit analysis is not part of the administrative or technical review and does not impact the issuance of a permit.

COMMENT 21: Location / Zoning

Commenters expressed concern regarding the location of the facility as it relates to current zoning ordinances and the proximity to residential and public areas, including but not limited to schools, churches, daycares, homeschools, public areas, residences, ranches, farms, tribal lands, an airport, food industries, as well as nearby tech, semiconductor, and chip manufacturing facilities in the area. Commenters expressed specific concerns regarding the potential impact on the nearby airport, including hazards to air navigation, takeoff and landing procedures, pilot safety, obstructions due to structure heights, and ask that Federal Aviation Administration (FAA) regulations be taken into consideration. Commenters are concerned that there are already other concrete plants in the area, stating that they don't want another. Commenters also questioned whether the area was property zoned for the operation of such a plant or if it should be located in an industrial zoned area, not near homes. Commenters expressed that the proposed plant should be located somewhere else. Multiple commenters state that they are too old to relocate. Judy Searcy Dryden commented that a bordering landowner should not have an effect on the land use of the neighboring property. Jeremy Q. Devore questioned the proposed location as it relates to the 440-yard distance requirements.

(Representative Reggie Smith, Group A, Randy Adams, Janice Akins, Samantha Allison, Luz Arce, Amber Armendariz, Ralph Armstrong, Art Arthur, Charles Ashley, Amy Ashlock, Andrea Paulette Aslam, Sesily Babekuhl, David Baca, Keith Baehmann, Cynthia Baker, Willies Carl Ballou, Debra Banks, Douglas Glenn Banner, Kelly Denise Barnes, Darla Barr, Kathy Bartlett, Robert Bauer, Heather Beaver, Nelson Beaver, Ashley Beck, Francis Beck, Jennifer Beecroft, Blake C. Beeson, Patti Beggs, Gary Bennett, Darald Berger, Lander Bethel, Tonya Bingham, Liz Birchall, Cliff Blackstock, Tammy Bohannon-Yule, James C. Boles, Nolan E. Bond, Linda Bowers, Paul David Bowers, Madilyn Bramer, Ashlin Bridwell, Cheryl Brociek, Ron Brockner, Ron R. Brockner, Bryan Brooks, Emily Brooks, Jan Broomall, Nancy Brown, Jeffrey Brown, Jeremiah Broyles, Tiffany Broyles, Jeremiah D. Broyles, Erika Bryan, Jamie Buckalew, Homer Bullard, Jennifer Bullard, Brenna Butler, Christa Call, Veronica Calzada, Sarah Campbell, Tommy Joe Carney, Holly Castleberry, Clint Catching, Paula A. Cavender, Shane Cavender, Andrew Cellars, Adam Cernero, Corey Chambers, Nicole Chambers, Kristin Chandler, Bobby Luke Chandler, Megan C. Chandler, Laura Childress, Art Clayton, Margaret Coleman, Lee Collins, Meghan Cone, Anthony Alan Cook, James Matt Cooper, Charli Cotten, Katie Courange, R. D. Cozad, Skyler Cozad, Traber Cozad, Cassady A. Craddock, Matthew Crain, Linda Carol Crain, Amanda Crawford, Andrew Crawford, James Crews, Donald Ray Cummings, Karen L. Cummings, Karen Cummings, Lindsay Cummings, Tracy R. Curry, Stephanie Davidson, Wes Davidson, Chanel Ann Davis, Cynthia L. Davis, Alicia Davis, Jordan Taylor Davis, Julie Davis, Karla Graham Davis, Preston Davis, Bruce Dawsey, Bruce W. Dawsey, Shawna Dawson, Heidi Debner, Thomas G. Debner, Bethany Devore, Jeremy Devore, Mary Gail Devore, Jeremy W. Devore, Jeremy Q. Devore, Deirdre Diamond, Melissa Doan, Kimberly Stewart Dodson, Kathleen Dophied, Judy Searcy Dryden, Robert E. Dryden, Judith S. Dryden, Searcy Dryden, Leslie M. Dulack, Michael Dulack, Christina N. Dunlap, Sherry Duran, Cindy Durrant, Michael Joseph Elliott, William Engle, Cendy Y. Escalera, Nayeli Escalera-Solis, Rachel Evans, Michael Fannin, Barrett Fannin, Jesse Farrer, Laura Fincher, James N. Flanery, Adam Fleming, Bobby Fletcher, Lindsey Flores, Harold Foster, William Foster, Frank Edward Gadek, Andrea

Ganow, Lori Gardner, Chris Gardner, Renny Gehman, Tracy Gilbert, Rex Glendenning, Donald E. Godwin, Roberto Gonzalez, Patricia C. Gonzalez, Lora Gordon, Margie Graf, Anabelle Graham, Amber Gravley, Laura Green, Linda J. Greenfield, Kit Grice, Brandon Grooms, Chloe Grooms, Rachel Grooms, Austin Grooms, Joshua Grooms, Richard Oran Gross, Jennifer Haeg, Damon L. Moore Hall, Teresa M. Hall, Ginger Ham, Dave Hammond, Matt Hardenburg, Emily Ann Hardwick, Letitia Harris, Jim L. Harvey, Rod Hawkins, Stephanie Hawkins, Christine Heck, Patricia Hedrick, Lisa Hejny, Moses Hejny, Bryan Hemman, Sarah Henry, Joann Hensley, Donna Hepner, Alyssa Hernanadez, Jerry Dean Hestand, Debbie Hester, Dwayne Hicks, Michael S. Hignight, Carol Hill, Melissa Hill, Melinda Hill, Amy Hoffman-Shehan, Suzanne Hooks, Don Horn, Charity Horne, Robin A. Horner, Scott Horner, Helen Horton, Gabe Howell, Joyce A. Huff, Jen Huff, Alice Hughes, Meghan Hughes, Mandy Hummel, Laura T. Hunt, Colin Drew Hunter, Linda K. Hunter, Lori Huntsman, Debbie Hurd, Heather Jacques, Mike Jacques, Phyllis D. James, Michael Jefferson, Rachel Jenkins, Chris Jennings, Trish Jennings, Suzanna Dryden Jensen, Linda Kay Johnson, Nathan K. Johnson, Carrie Jones, Elizabeth Jones, Lori Jones, Debbie Elaine Judkins, Carl Kalbfleisch, Cynthia J. Kaleri, Kenyon Kemp, Dina Kenemore, Brittany Kennedy, James Kimbrel, Geri V. King, Ken King, Laura L. King, Laura Kirilloff, Debbie Kirkpatrick, Keith Kisselle, Peggy Klas, Detra Klas, Vanetta Klok, Anthony J. Kordosky, Rick Kvaal, Cindy Kvaal, Irms Kyle, Greg L. Laird, Amanda Lambert, Lauren Lambert, Austin Lambert, Benjamin T. Landgraf, Chris Landino, William Landrum, Terri Langford, Julie Lanicek, Jason R. Lankford, Jason Lankford, Crystal Lawson, Rhonda Lawson, Wayne Lee, Patsy Lemaster, James Lewellen, Kylee Likarish, Victor Lissiak, Mary Little, Jim Lucas, Trudy Lucas, Eric Lunde, Ronald Clay Lynch, Dakotah Mahan, Brian Mai, Sarah Mallory, Rickey J. Malta, Casey Mandi, Josh Marr, Rose M. Marr, Monica Martin, Mickie Martin, Brittany Martin, Steve Marum, Catherine Matuella, Patsy Mauldin, Dusty Wayne Mayer, Traci McCarthy, Claudia L. McClure, Les McConnell, Garrett McCown, Janna C. McCown, Vivian Robin McCoy, Karla McDonald, Larry McDonald, Alan Lee McKelva, Diana McMahan, Patrick Neal McNutt, Kevin Meissner, Dusty Melton, Amy Meyer, Steve Miller, Caitlyn Miller, Davida Miorin, Lynn M. Mitchusson, Michael J. Mitchusson, Lynn M Mitchusson, Mehrdad Moayedi, Joyce L. Moore, Grover Franklin Moore, Angela Moreau, Brad Morgan, Mary Morgan, Jason Morin, Shandi Morris, Amarise Morris, Andronica Morris, Matthew Morris, Zadrian Morris, Terry Morrison, Marthann Morrow, Ashley Morrow, Sierra Mueller, Karen Murphy, Rick Myer, Lucy Myer, Ramesh Nadella, Jason Lee Naramor, Mitaj Nathwani, Sharon Nelson, Jacob Nelson, Sarah Newtown, Andeelea Anderson Nichols, Danny Thomas Nichols, Chris Nicoloff, Marie Nixon, Paul Nixon, Margie Noel, Marye Jean Norman, Brandon Norris, Jennifer Norris, Brian E. Norris, Tera Norris, Erica Northrup, Duncan C. Norton, Duncan C Norton, Andrew Wallace Olmstead, Brent Omdahl, Brent E. Omdahl, Angie Onley, Melinda Ortley, Bonita L. Overbey, Bobby N. Overbey, Jeff Overstreet, Paula Overstreet, Tyler Overstreet, Nikolaus Owen, Brian Parks, James Parrish, Trent Patterson, Holland Paula, Debra Payne, Emily Powell, Taylor P. Powell, Shelly Prewitt, Josh Price, Lindsay Price, Ricky Price, Joshua D. Price, Delfina Prisock, Chelsey Pulcheon, Ray H. Purdom, Craig Rabe, Kathy Raner, Justin Neal Raner, Alan Redd, Patsy A. Reeves, Laura Reeves, Richard Reeves, J. Renfro, Kevin Diaz Reyes, Tara Rice, Charity Riley, Cindy Risk, Naif Risk, Joy Roberts, Mary Roberts, Judy Carol Robison, Luanne Robison, Mark Douglas Robison, Douglas Ray Robison, Brad Robnett, Mona Robnett, Liz Rocamontes, Elizabeth Rodriguez, Jennifer Rollins, Mel Ronduen, Sharla Ross, Kerri Rowe, Kara Royston, Brad Rucker, Kayli Rushing, Bettye Russell, Brian Russell, Linda Sue Russell, Linda Russell, Russell Rutherford, Shannon Ryan,

Christina R. Rykens, Anoo Sathappun, Jim Schermbeck, Jarod Schmitt, Joann Schnitker, Bradley J. Schnitker, Marci Schnitker, Racheal Sedmack, Doreen Shacklee, Kent Sharp, True Shaw, Rosa Shelton, David Shepard, Kenda Sinclair, Sharon Slaughter, David Smith, Reggie Smith, Wendy Smith, Derek Smith, Kyle Smith, Dustin Smith, Leann Smith, Jeff Randall Spencer, Cynthia Annk Spencer, Julia Spencer, Frances Sprabary, Drew Springer, Sara Sprinkle, Bobby Overbey Sr., Penny Stahl, Roxanne Standerfer, Alice Stewart, James Stewart, Robert Stewart, Shirley Stewart, Patricia Ann Stewart, Alice Faye Stewart, Shana Stonebarger, Chandler Ryan Strawn, Chandler Strawn, Dana Strong, Crystal Stueve, Sathappun Subbiah, James Sutherland, Kenneth Svehlak, Sue Svehlak, Meghan Swindle, Griffin Tammy, Margaret Taylor, Betty Jean Taylor, Thomas Taylor, Thomas L. Taylor, Thomas Leland Taylor, Shawn C. Teamann, Cristi Tenant, Alyssa Thomas, Dana Thornhill, Lisa Tibbets, Julie Travis, Yolanda Trevino, Tonya Troxtell, Griffin Underwood, Kristi Utley, Gail W. Utter, Diana Vanbuskirk, Ronald Vanbuskirk, Mickinze Vanherpen, Denise Vawter, Brittany Verhoek, Marilyn Sue Vest, Larry Vincent, Becky Vincent, Larry W. Vincent, Mark Vodry, Kimberly Vodry, Jenny Vonbehren, Jaymison Bella Voto, Campbell Voto, Jay Dee Voto, Jay Voto, Darren W., Leonard G. Waldrum, Monte Walker, Phillip Walker, Paula Walker, Brian Wang, Bihfang Want, John Ward, Mingyan Ward, Cameryn P. Warren, Kevin Wasp, Jacqueline Wassom, Wyatt Watson, Shelbie Watts, Lanisha Weaver, Cynthia Weems, Rudy Weems, Cynthia L. Weems, Amy Wheeler, Ronnie Whiteley, Edward Whitfield, Monica L. Whitfield, Jeff Whitmire, Jim Whitten, Teresa Wildman, Ruth E. N. Cox Williamson, Jennifer Williamson, Jeffrey Wilmoth, Kevin Wilson, Dustin Ray Wilson, Krista Lucas Wynn, Jace Yarbrough, Caroline Yuan, Angela Zarallo, Savanna Zinn, Tracie Zweifel-Gibson, Angela Wilson , April Williams, Cynthia Zinn, David G. Sileven, Dorothy Schmoker, Gary Schnitker, Kaaren J. Teuber, Paula Neely, Robert Sanchez, Robin Sears, Shayla Wheeler, Terry Rainbow, Angela Onley, Sara Salinas)

RESPONSE 21: The TCEQ does not have jurisdiction to consider plant location choices made by an applicant when determining whether to approve or deny a permit application, unless a statute or rule imposes specific distance limitations that are enforceable by the TCEQ. Zoning and land use are beyond the authority of the TCEQ for consideration when reviewing air quality permit applications and such issues should be directed to local officials. Citizens concerned about land use and zoning ordinances should contact city, county, or local zoning officials. The issuance of an air quality authorization does not override any local zoning requirements that may be in effect and does not authorize an applicant to operate outside of local zoning requirements.

The TCEQ Dallas/Fort Worth Regional Office conducted a site review of the area on December 3, 2021. According to that site review, nuisance/odor potentials were high. The review also described the surrounding land use as agricultural, stating that "a church, a business, and approximately five rural residential properties are located along the Site's property line. The rural town of Dorchester is located south of the Site." The site review documented the nearest off-property receptor is a business (Texas Aero Sport) approximately 500 feet away. The distance from the facility to the nearest property line, according to the site review, is approximately 200 feet. The site review documented the following: "The Site is a new site; therefore, there were no actual emission points to measure from. Distances obtained for this site assessment were based on the representations included on the proposed site and plot maps.

According to these maps, the Site's operations will be located near a church, a business, and rural residential properties. The impact of potential nuisance conditions affecting these sensitive receptors should be considered." The recommendation of the Regional Office was to proceed with the permit review and the site review indicated no reasons to deny the permit application. Please *see* Response 1 for information about the air quality and health effects.

Although TCEQ cannot consider zoning or land use, the TCEQ does conduct a health effects review to ensure that there will be no adverse impacts to human health and welfare. As described in Response 1, a protectiveness review was conducted for all contaminants emitted. The maximum concentrations were evaluated at the property line, at the nearest off-property receptor, and at any schools located within 3,000 feet of the proposed facilities and found to be protective of human health and the environment.

The TCAA prohibits a concrete crusher from being located within 440 yards of a residence, school, or place of worship. The proposed permit is to obtain authorization for a cement kiln, not a concrete crusher; therefore, the 440-yard distance requirements are not applicable. There is no proposed concrete crusher as part of this application and the TCEQ cannot deny this air permit based on plant location.

COMMENT 22: Noise and Light Pollution / Operating Hours

Commenters expressed concern about noise and light pollution from the proposed project and cited noise ordinances in the area. Commenters are concerned about noise from the plant, stating that it will disrupt church services. Several commenters stated that they moved to the area for peace and quiet and to get away from the city noise. Commenters asked about the operating hours of the plant and expressed concern that operations would occur 24 hours a day, 7 days a week. Commenters expressed concern that overnight operations are not suitable for the nearby residential areas, state that noise levels would interrupt their everyday lives, and are concerned that noise and light pollution will keep them up at night. Manual Watson asks about the sound level from the operating equipment. Jeremy Devore questioned whether the plant would be able to operate 8,760 hours per year.

(Group A, Novin Abdi, Art Arthur, Andrea Paulette Aslam, Sesily Babekuhl, Keith Baehmann, Cynthia Baker, Willies Ballou, Willies Carl Ballou, Heather Beaver, Ashley Beck, Francis Beck, Blake C. Beeson, Cliff Blackstock, Nancy Bond, Nolan E. Bond, Laffel Brown, Nancy Brown, Tiffany Broyles, Jamie Buckalew, Veronica Calzada, Clint Catching, Adam Cernero, Kristin Chandler, Lee Collins, Meghan Cone, R. D. Cozad, Skyler Cozad, Camryn Craddock, Brian Culp, Kristen Cunningham, Bruce W Dawsey, Thomas G. Debner, Jeremy Devore, Jeremy Q. Devore, Jeremy W. Devore, Kathleen Dophied, Leslie M. Dulack, Michael Joseph Elliott, William Engle, Adam Fleming, William Foster, Chris Gardner, Rex Glendenning, Lora Gordon, Richard Oran Gross, Teresa M. Hall, Ginger Ham, Matt Hardenburg, Moses Hejny, Moses Henjy, Sarah Henry, Donna Hepner, Amy Hertel, Melissa Hill, Robin A Horner, Alice Hughes, Debbie Hurd, Phyllis D. James, Michael Jefferson, Debbie Elaine Judkins, Cynthia J. Kaleri, James Kimbrel, Laura L. King, Geri V. King, Ken King, Peggy Klas, Detra Klas, Vanetta Klok, Anthony J. Kordosky, Cindy Kvaal, Julie Lanicek, Victor Lissiak, Eric Lunde, Brian Mai,

Rickey J. Malta, George Mason, Catherine Matuella, Dusty Wayne Mayer, Traci McCarthy, Les McConnell, Amy Meyer, Davida Miorin, Mehrdad Moayedi, Grover Franklin Moore, Brad Morgan, Mary Morgan, Jason Morin, Karen Murphy, Rick Myer, Mitaj Nathwani, Sharon Nelson, Danny Thomas Nichols, Chris Nicoloff, Marie Nixon, Margie Noel, Duncan C. Norton, Bonita L. Overbey, Bobby N. Overbey, Jeff Overstreet, James Parrish, Lindsay Price, Delfina Prisock, Patsy A. Reeves, Kevin Diaz Reyes, Cindy Risk, Naif Risk, Joy Roberts, Jennifer Rollins, Brian Russell, Linda Sue Russell, Carrie Saindon, Bradley J. Schnitker, Mary J. Scott, Rosa Shelton, David Smith, Sara Sprinkle, Penny Stahl, Robert Stewart, Shirley Stewart, Stephanie Strawn, James Sutherland, Kenneth Svehlak, Sue Svehlak, Griffin Tammy, Thomas L. Taylor, Thomas Leland Taylor, Cristi Tenant, Julie Travis, Diana Vanbuskirk, Betty Jean Taylor, Bihfang Wang, Brian Wang, Bihfang Wang, Manual Watson, Shelbie Watts, Rudy Weems, Jeff Whitmire, Kevin Wilson, Rebecca Zey, Tracie Zweifel-Gibson)

RESPONSE 22: The TCEQ does not have authority under the TCAA to consider noise or light pollution when determining whether to approve or deny a permit application. The TCEQ also does not have authority under the TCAA to require or enforce any noise abatement measures. Noise ordinances are normally enacted by cities or counties and enforced by local law enforcement authorities. Commenters should contact their local authorities with questions or complaints about noise.

The TCEQ does not have the authority to regulate the hours of operations of a facility or site if the permit review demonstrates all applicable federal and state regulations are met. Accordingly, TCEQ cannot limit the hours of operation unless an emission rate is dependent on a limit on operational hours or there are issues associated with the air quality analysis that require the limitation. As described in Response 1, the protectiveness review conducted conservatively assumes a 24 hour per day operating schedule and determined that emissions are protective. The Applicant represented operations up to 8,760 hours per year. Applicants are bound by the representations in their applications including work hours.

COMMENT 23: Traffic / Trucks / Roads / Vehicular Safety / Infrastructure

Commenters expressed concern about increased traffic of cars and trucks as a result of the proposed project. Commenters expressed concern that the plant would increase truck traffic, traffic congestion, and road hazards. Commenters expressed concern concerned about truck emissions, spillage of debris from trucks, impacts to road safety, the increased potential for vehicular accidents, negative impacts to public infrastructure, and damage to roads. Several commenters are concerned that the roads are not designed for the large trucks, specifically the weight and volume of the heavy equipment that will service the plant.

(Group A, Luz Arce, Ralph H. Armstrong, Art Arthur, Amy Ashlock, Keith Baehmann, Cynthia Baker, Willies Carl Ballou, Douglas Glenn Banner, Kelly Denise Barnes, Ashley Beck, Francis Beck, Nancy Bond, Nolan E. Bond, Linda Bowers, Ashlin Bridwell, Laffel Brown, Nancy Brown, Tiffany Broyles, Jamie Buckalew, Brenna Butler, Veronica Calzada, Clint Catching, Kristin Chandler, Laura Childress, James Matt Cooper, R. D. Cozad, Skyler Cozad, Traber Cozad, Melissa Gail Croney, Brian Culp, Chanel Ann Davis, Bruce W. Dawsey, Bethany Devore, Jeremy W. Devore, Jeremy Q. Devore, Deirdre Diamond, Joanne Dickey, Judith S. Dryden, Michael Joseph Elliott, William Engle, Cendy

Y. Escalera, Blanca Nayeli Escalera-Solis, Rachel Evans, William Foster, Chris Gardner, Renny Gehman, Lora Gordon, Brandon Grooms, Matt Gudgel, Teresa M. Hall, Teresa M. Hall, Ginger Ham, Matt Hardenburg, Amy Hartel, Patricia Hedrick, Lisa Hejny, Moses Hejny, Joann Hensley, Donna Hepner, Jerry Dean Hestand, Dwayne Hicks, Michael S. Hignight, Suzanne Hooks, Alice Hughes, Lori Huntsman, Debbie Hurd, Phyllis D. James, Carrie Jones, Debbie Elaine Judkins, Cynthia J. Kaleri, Dina Kenemore, Laura L. King, Geri V. King, Ken King, Detra Klas, Cindy Kvaal, Rick Kvaal, William Landrum, Julie Lanicek, James Lewellen, Brian Mai, Rickey J. Malta, Michael Gene Marsh, George Mason, Patsy Mauldin, William Mayer, Les McConnell, Matthew Morris, Ashley Morrow, Karen Murphy, Lucy Myer, Rick Myer, Chris Nicoloff, Marie Nixon, Rose Marie Nixon, Paul Nixon, Margie Noel, Bonita L. Overbey, Bobby N. Overbey, Jeff Overstreet, James Parrish, David Plyler, Alan Redd, Patsy A. Reeves, Tara Rice, Joy Roberts, Mark Douglas Robison, Elizabeth Rodriguez, Jennifer Rollins, Brian Russell, Linda Russell, Linda Sue Russell, Carrie Saindon, Betty Scott, Rosa Shelton, Gary Shields, Sharon Slaughter, David Smith, Darlene L. Smith, Wendy Smith, Jeff Randall Spencer, Frances Sprabary, Drew Springer, Penny Stahl, Roxanne Standerfer, Alice Stewart, James Stewart, Robert Stewart, Shirley Stewart, Alice Faye Stewart, Chandler Strawn, Dana Strong, Sathappun Subbiah, James Sutherland, Kenneth Svehlak, Sue Svehlak, Thomas Leland Taylor, Thomas L. Taylor, Betty Jean Taylor, Cristi Tenant, Yolanda Trevino, Tonya Troxtell, Kristi Utley, Ronald Vanbuskirk, Diana Vanbuskirk, Becky Vincent, Kimberly Vodry, Leonard G. Waldrum, Bihfang Wang, Brian Wang, Lanisha Weaver, Cynthia Weems, Rudy Weems, Ronnie Whiteley, Jeff Whitmire, Teresa Wildman, Kevin Wilson, Angela Zarallo, Rebecca Zey, Margaret Norris , Robin Sears, Borming Wang)

RESPONSE 23: The Applicant is prohibited by TCEQ rule (30 TAC § 101.5) from discharging air contaminants, uncombined water, or other materials from any source which could cause a traffic hazard or interference with normal road use. If the sources are operated in compliance with the terms and conditions of the permit, nuisance conditions should not occur. Individuals are encouraged to report any concerns about nuisance issues or suspected noncompliance with terms of any permit or other environmental regulation by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. If the facility is found to be out of compliance with the terms and conditions of the permit, it may be subject to possible enforcement action.

Although TCEQ rules prohibit creation of a nuisance, the TCEQ does not have jurisdiction to consider traffic, road safety, or road repair costs when determining whether to approve or deny a permit application. In addition, trucks are considered mobile sources, which are not regulated by the TCEQ. The TCEQ is also prohibited from regulating roads per the TCAA § 382.003(6) which excludes roads from the definition of "facility."

Similarly, TCEQ does not have the authority to regulate traffic on public roads, load-bearing restrictions, and public safety, including access, speed limits, and public roadway issues. These concerns are typically the responsibility of local, county, or other state agencies, such as the Texas Department of Transportation (TxDot) and the Texas Department of Public Safety (DPS).

COMMENT 24: Quality of Life / Aesthetics / Property Values

Commenters expressed concern about the effect of the proposed project on their quality of life, on the aesthetics of the area, and on their property and land values, and taxes. Commenters stated they moved to the area for a better quality of life, clear and cleaner air, peace and quiet, and country living. Commenters expressed concern that their quality of life would be impacted and that they would no longer be able to enjoy outdoor activities. Commenters expressed concern that the proposed plant would negatively impact their property values and the marketability of their homes.

(Group A, Silvia Adams, Randy Adams, Janice Akins, Ralph H. Armstrong, Ralph Armstrong, Art Arthur, Andrea Paulette Aslam, David Baca, Willies Ballou, Willies Carl Ballou, Debra Banks, Douglas Glenn Banner, Heather Beaver, Nelson Beaver, Liz Birchall, Nancy Bond, Nolan E. Bond, Linda Bowers, Paul David Bowers, Cheryl Brociek, Lorie Brockner, Ron Brockner, Jan Broomall, Laffel Brown, Nancy Brown, Tiffany Broyles, Homer Bullard, Brenna Butler, Sarah Campbell, Stephen Campeau, Clint Catching, Adam Cernero, Kristin Chandler, Margaret Coleman, Meghan Cone, James Matt Cooper, Charli Cotten, Katie Courange, Camryn Craddock, Cassady A. Craddock, Kristen Cunningham, Tracy R. Curry, Chanel Ann Davis, Bruce W. Dawsey, Shawna Dawson, Heidi Debner, Rebecca Demel, Mary Gail Devore, Deirdre Diamond, Joanne Dickey, Kimberly Stewart Dodson, Judy Searcy Dryden, Judith S. Dryden, Christina N. Dunlap, Sherry Duran, Michael Joseph Elliott, William Engle, Angelica Escalera, Laura Fincher, Lisa Marie Flaggert, Bobby Fletcher, Lindsey Flores, William Foster, Chris Gardner, Rex Glendenning, Roberto Gonzalez, Patricia C. Gonzalez, Amber Gravley, Linda J. Greenfield, Richard Oran Gross, Jennifer Haeg, Matt Hardenburg, Stephanie Hawkins, Patricia Hedrick, Moses Hejny, Lisa Hejny, Sarah Henry, Joann Hensley, Donna Hepner, Amy Hertel, Debbie Hester, Amy Hoffman-Shehan, Suzanne Hooks, Don Horn, Charity Horne, Robin A. Horner, Scott Horner, Alice Hughes, Debbie Hurd, Heather Jacques, Mike Jacques, Phyllis D. James, Suzanna Dryden Jensen, Liberty Johnson, Elizabeth Jones, Debbie Elaine Judkins, Carl Kalbfleisch, Kenyon Kemp, James Kimbrel, Laura L. King, Laura Kirilloff, Peggy Klas, Cindy Kvaal, Greg L. Laird, Austin Lambert, Chris Landino, Julie Lanicek, Patrick Latona, Val Lauerhahs, Rhonda Lawson, Trudy Lucas, Eric Lunde, Brian Mai, Traci McCarthy, Kathleen McClure, Les McConnell, Garrett McCown, Janna C. McCown, Diana McMahan, Michael J. Mitchusson, Joyce L. Moore, Angela Moreau, Brad Morgan, Jason Morin, Matthew Morris, Terry Morrison, Ashley Morrow, Rick Myer, Danny Thomas Nichols, Andeelea Anderson Nichols, Chris Nicoloff, Marie Nixon, Margie Noel, Jennifer Norris, Erica Northrup, Duncan C. Norton, Melinda Ortley, Bonita L. Overbey, Jeff Overstreet, Martha Paben, James Parrish, Shelly Prewitt, Josh Price, Joshua D. Price, Lindsay Price, Craig Rabe, Alan Redd, Cindy Risk, Naif Risk, Joy Roberts, Kayli Rushing, Bettye Russell, Brian Russell, Russell Rutherford, Shannon Ryan, Carrie Saindon, Jim Schermbeck, Jarod Schmitt, Bradley J. Schnitker, Marci Schnitker, Betty Scott, True Shaw, Rosa Shelton, Gary Shields, Sharon Slaughter, David Smith, Reggie Smith, Kyle Smith, Frances Sprabary, Drew Springer, Penny Stahl, Robert Stewart, Shirley Stewart, James Sutherland, Kenneth Svehlak, Sue Svehlak, Griffin Tammy, Cristi Tenant, Dana Thornhill, Yolanda Trevino, Tonya Troxtell, Kristi Utley, Diana Vanbuskirk, Mickinze Vanherpen, Denise Vawter, Larry Vincent, Kimberly Vodry, Jay Dee Voto, Lynsey Voto, Bihfang Wang, Brian Wang, Mingyan Ward, Manual Watson, Lanisha Weaver, Cynthia Weems, Rudy Weems, Joseph White, Monica L. Whitfield, Jeff

Whitmire, Jim Whitten, Carolyn Wildman, Teresa Wildman, Kevin Wilson, Krista Lucas Wynn, Angela Zarallo, Rebecca Zey, Gary Schnitker, Kaaren J. Teuber, Nancy Jan Shaw)

RESPONSE 24: The TCEQ does not have the jurisdiction to consider potential effects from plant location, aesthetics, zoning and land use issues, or effects on property values when determining whether to approve or deny this air permit.

COMMENT 25: Quarry / Mining / Blasting / Construction Emissions

Commenters expressed concern about the emissions and impacts from associated quarry, mining and blasting operations and request that these operations be included as part of the permit application. Commenters expressed concern that the proposed operations would cause sinkholes, leave craters in the ground, or make the land collapse. Commenters expressed concern that a mine or quarry is not considered in the application or modeling submittal. Commenters are concerned about potential seismic waves and blasting from the proposed project, as well as the potential to damage surrounding schools, buildings, oil leases, production and manufacturing facilities, and landowners nearby. Commenters expressed specific concern that blasting operations would have a detrimental impact on nearby tech, semiconductor, and chip manufacturing facilities that have already invested in the area. Judy Searcy Dryden commented that not including the mining/quarry pollution effects should be an infraction of the State and Federal Clean Air and Clean Water Laws.

(Group A, Silvia Adams, Art Arthur, Sesily Babekuhl, Willies Carl Ballou, Ashley Beck, Francis Beck, Gary Bennett, Lander Bethel, Nancy Brown, Tiffany Broyles, Clint Catching, Andrew Cellars, Adam Cernero, Kristin Chandler, Karla K. Colwell, Meghan Cone, Camryn Craddock, Amanda Crawford, Tracy R. Curry, Wes Davidson, Cynthia L. Davis, Bruce W. Dawsey, Thomas G. Debner, Jeremy Q. Devore, Jeremy W. Devore, Judy Searcy Dryden, Judith S. Dryden, Mark L. England, Adam Fleming, Harold C. Foster, Rex Glendenning, Donald E. Godwin, Austin Grooms, Matt Hardenburg, Patricia Hedrick, Lisa Hejny, Melissa Hill, Amy Hoffman-Shehan, Gabe Howell, Phyllis D. James, Suzanna Dryden Jensen, Debbie Elaine Judkins, James Kimbrel, Ken King, Geri V. King, Vanetta Klok, Anthony J. Kordosky, Rick Kvaal, Cindy Kvaal, Chris Landino, William Landrum, Julie Lanicek, Wayne Lee, Christopher A. Lopez, Eric Lunde, Ronald Clay Lynch, Steve Marum, Dusty Wayne Mayer, Traci McCarthy, Larry McDonald, Karla McDonald, Davida Miorin, Mehrdad Moayedi, Brad Morgan, Mary Morgan, Jason Morin, Mitaj Nathwani, Paul Nixon, Brent E. Omdahl, Bobby N. Overbey, Sherry Perrin, David Plyler, Delfina Prisock, Kathy Raner, Justin Neal Raner, Kevin Diaz Reyes, Mona Robnett, Linda Russell, Carrie Saindon, Betty Scott, Doreen Shacklee, Kent Sharp, Sharon Slaughter, David Smith, Wendy Smith, Reggie Smith, Darlene L. Smith, Cynthia Annk Spencer, Drew Springer, Robert Stewart, Shirley Stewart, Alice Faye Stewart, Chandler Strawn, Sathappun Subbiah, Kenneth Svehlak, Sue Svehlak, Thomas L. Taylor, Thomas Leland Taylor, Shawn C. Teamann, Cristi Tenant, Tonya Troxtell, Jay Dee Voto, Leonard G. Waldrum, Leonard G. Waldrum, Manual Watson, Wyatt Watson, Jeff Whitmire, Kevin Wilson, Rebecca Zey, Tracie Zweifel-Gibson, April Williams, Kaaren J. Teuber, Renata Richardson, Robin Sears)

RESPONSE 25: The TCEQ does not have jurisdiction to regulate mines, quarries, or associated blasting. Mines and quarries are specifically excluded from the definition of

facility in the TCAA § 382.003(6). Concerns regarding noise and vibrations should be directed to local officials.

Emissions of PM from the quarry, however, cannot create a nuisance condition. The Applicant must comply with the TCAA and all TCEQ rules and regulations, including 30 TAC § 101.4, which prohibits a person from creating or maintaining a nuisance. The TCEQ also does not have authority under the TCAA to regulate emissions from mobile sources. Construction equipment such as bulldozers and portable generators are considered mobile or non-road sources. However, TCEQ does require owners and operators to comply with 30 TAC § 101.4 which prohibits a person from creating or maintaining a condition of nuisance such as interference with the normal use and enjoyment of property. Individuals are encouraged to report any concerns about nuisance issues by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186.

COMMENT 26: Effect on Local Economy and Other Industries

Commenters expressed concern about the effects this project could have on the local economy and business in the area. Commenters expressed concern that the proposed plant would hinder residential and commercial growth in the area. Commenters expressed concern that the nearby tech, semiconductor, and chip manufacturing facilities have already invested money in the area, and that the proposed project would be detrimental to these existing businesses.

(Janice Akins, Art Arthur, Keith Baehmann, Willies Carl Ballou, Robert Bauer, Blake C. Beeson, Emily Brooks, Jeffrey Brown, Sarah Campbell, Tommy Joe Carney, Clint Catching, Adam Cernero, Meghan Cone, Stephanie Davidson, Wes Davidson, Julie Davis, Bruce W. Dawsey, Bruce Dawsey, Jeremy Devore, Mary Gail Devore, Mark L. England, Barrett Fannin, Tracy Gilbert, Donald E. Godwin, Austin Grooms, Chloe Grooms, Joshua Grooms, Dave Hammond, Matt Hardenburg, Jim L. Harvey, Lisa Hejny, Sarah Henry, Gabe Howell, Meghan Hughes, Mandy Hummel, Phyllis D. James, Suzanna Dryden Jensen, Liberty Johnson, Geri V. King, Ken King, Debbie Kirkpatrick, Vanetta Klok, Amanda Lambert, Julie Lanicek, Mary Little, Trudy Lucas, Eric Lunde, Brian Mai, Casey Mandi, Steve Marum, Catherine Matuella, Traci McCarthy, Kathleen McClure, Garrett McCown, Vivian Robin McCoy, Karla McDonald, Larry McDonald, Michael J. Mitchusson, Joyce L. Moore, Angela Moreau, Brad Morgan, Marthann Morrow, Paul Nixon, Rose Marie Nixon, Andrew Wallace Olmstead, Brent Omdahl, Brent E. Omdahl, Jeff Overstreet, Tyler Overstreet, Nikolaus Owen, David Plyler, Joshua D. Price, Lindsay Price, Kathy Raner, Justin Neal Raner, Mona Robnett, Linda Russell, Russell Rutherford, Shannon Ryan, Kent Sharp, True Shaw, David Shepard, David Smith, Reggie Smith, Derek Smith, Michael Wayne Speed, Julia Spencer, Drew Springer, Kristy Stachmus, Shawn C. Teamann, Tonya Troxtell, Gail W. Utter, Diana Vanbuskirk, Marilyn Sue Vest, Mark Vodry, Kimberly Vodry, Jaymison Bella Voto, Paula Walker, Jacqueline Wassom, Wyatt Watson, Jeff Whitmire, Ruth E. N. Cox Williamson, Kevin Wilson, Krista Lucas Wynn, Angela Zarallo, April Williams, Nancy Jan Shaw, Robin Sears, Sara Salinas)

RESPONSE 26: Issues related to the local economy are outside the scope of review of an air quality permit. The Executive Director has reviewed the permit application in accordance with the applicable law, policy, and procedures, in accordance with the

agency's mission to protect our state's human and natural resources consistent with sustainable economic development. If an applicant meets the requirements for an air quality permit, the TCEQ must grant the permit.

COMMENT 27: Mental Health and Financial Well-being

Joyce L. Moore expressed concern about the mental and financial well-being of the people in the area due to the proposed plant. Jeremy W. Devore expressed concern regarding the negative impact on mental health, emotions, and possible PTSD triggers due to the proposed plant. Ja Dee Voto commented that the proposed plant would cause emotional distress. Gabriael Williams commented that the proposed plant would cause mass psychogenic illnesses and negatively impact mental health. Amber Bratt commented that the proposed plant would take an emotional toll on nearby residents.

(Amber Bratt, Jeremy W. Devore, Joyce L. Moore, Jay Dee Voto, Gabriel Williams, Robin Sears)

RESPONSE 27: The TCAA does not give the TCEQ authority to regulate air emissions beyond the direct impacts (inhalation) that the air emissions have on human health or welfare. In addition, the TCAA specifically address air-related issues. This permit, if issued, would regulate the control and abatement of air emissions only.

COMMENT 28: Corporate Profits

Commenters expressed concern regarding the company profits made from the proposed project at the expense to the surrounding community.

(Debra Banks, Tonya Bingham, Tiffany Broyles, Brenna Butler, Andrew Cellars, Linda Carol Crain, Lindsay Cummings, Karen Cummings, Karen L. Cummings, Sherry Duran, Michael Joseph Elliott, Adam Fleming, Connor Gillispie, Brandon Grooms, Rachel Grooms, Melissa Hill, Suzanna Dryden Jensen, Kylee Likarish, Patrick Neal McNutt, Bonita L. Overbey, Betty Scott, Leann Smith, Penny Stahl, Meghan Swindle, Mickinze Vanherpen, Jeff Whitmire, Teresa Wildman)

RESPONSE 28: The TCEQ is not authorized to consider a company's financial status nor its profits in determining whether a permit should be issued. TCEQ's review of this company's application included analysis of health impacts and application of best available control technology (BACT), and based on this review, the facility should comply with all applicable health effects guidelines and emission control requirements. Continued compliance with health effects guidelines and BACT requirements is expected if the company operates in compliance with the permit terms and conditions. Individuals are encouraged to report any environmental concerns at the facility by contacting the TCEQ Dallas/Fort Worth Regional Office at 817-588-5800 or by calling the 24-hour toll-free Environmental Complaints Hotline at 1-888-777-3186. The TCEQ evaluates all complaints received. If the facility is found to be out of compliance with the terms and conditions of the permit, it will be subject to possible enforcement action.

COMMENT 29: TCEQs Responsibility to the Community / General Opposition / Support

Commenters asked that the TCEQ consider residents and their wishes and choose not to approve the permit registration for the proposed plant. Commenters express general opposition to the proposed plant. Commenters ask that the TCEQ uphold their mission statement. Judy Searcy Dryden expressed concern that the TCEQ would approve the permit just to allow the Applicant 'the ability to stay competitive,' further stating that the Agency should be protecting the safety of Texans and assuring plants are using best management practices. Tyler and Shelby Overstreet submitted a petition of signatures expressing general opposition. Willies Carl Ballou commented that the State of Texas needs to protect its citizens and not get paid off by questionable groups. Donald Ray Cummings commented that TCEQ will be the ones to blame for turning the area into an environmentally unhealthy industrial blight. Peter Christensen and Donald Bailey expressed general support for the proposed project.

(Group A, Group B, Novin Abdi, Silvia Adams, Randy Adams, Janice Akins, Samantha Allison, Amber Armendariz, Ralph Armstrong, Katrina Lynn Arsenault, Art Arthur, Charles Ashley, Sesily Babekuhl, Keith Baehmann, Donald Bailey, Willies Carl Ballou, Douglas Glenn Banner, Kelly Denise Barnes, Laura Barnett, Thomas Clay Barnett, Darla Barr, Faith Barrett, Kathy Bartlett, Mark Baumgardner, Heather Beaver, Jennifer Beecroft, Blake C. Beeson, Patti Beggs, Deanna Bell, Tonya Bingham, Cliff Blackstock, Tammy Bohannon-Yule, Nolan E. Bond, Nancy Bond, Linda Bowers, Virginia Brawley, Ron R. Brockner, Jan Broomall, Erika Bryan, Jamie Buckalew, Homer Bullard, Donna Burk, Marie Burns, Brenna Butler, Stephen Campeau, Eric Cantu, Clint Catching, Cary Catching, Adam Cernero, Corey Chambers, Megan C. Chandler, Laura Childress, Regina Chisum, Peter Christensen, Art Clayton, Steve Thomas Cohea, Lee Collins, Karla K. Colwell, Meghan Cone, James Matt Cooper, Katie Courange, Eric Covder, Skyler Cozad, Camryn Craddock, Cassady A. Craddock, Amanda Crawford, Brian Culp, Donald Ray Cummings, Karen Cummings, Karen L. Cummings, Lindsay Cummings, Kristen Cunningham, Ethan Cunningham, Tracy R. Curry, Jeff Dailey, Angela Davidson, Dee F. Davis, Karla Graham Davis, H. C. Davis, Mark Davis, Alicia Davis, Julie Davis, Bruce Dawsey, Shawna Dawson, Heidi Debner, Thomas G. Debner, Rebecca Demel, Mary Gail Devore, Jeremy W. Devore, Jeremy Devore, Deirdre Diamond, Joanne Dickey, Melissa Doan, Kathleen Dophied, Judy Searcy Dryden, Judy Dryden, Robert E. Dryden, Judith S. Dryden, Cindy Durrant, Mark L. England, Angelica Escalera, Cendy Y. Escalera, Blanca Nayeli Escalera-Solis, Rachel Evans, Barrett Fannin, Jesse Farrer, Phillip Wayne Farris, Stanley Feld, Courtney Fierro, Laura Fincher, James N. Flanery, Adam Fleming, Bobby Fletcher, Lindsey Flores, Harold C. Foster, Robert Franze, Andrea Ganow, Lori Gardner, Chris Gardner, Renny Gehman, Tracy Gilbert, Rex Glendenning, Paula Glenn, Donald E. Godwin, Margie Graf, Mayan Grantland, Jeffrey Neal Gray, Laura Green, Linda J. Greenfield, Austin Grooms, Brandon Grooms, Chloe Grooms, Rachel Grooms, Joshua Grooms, Matt Gudgel, Hillary Gurnea, Teresa M. Hall, Ginger Ham, Dave Hammond, Carol Ann Hardy, Jim L. Harvey, Patricia Hedrick, Sarah Henry, Joann Hensley, Melinda Hill, Suzanne Hooks, Charity Horne, Scott Horner, Helen Horton, Sherry Howard, Joyce A. Huff, Jen Huff, Mandy Hummel, Laura T. Hunt, Debbie Hurd, Brody Hust, Billie Charels Ingram, Phyllis D. James, Rachel Jenkins, Trish Jennings, Suzanna Dryden Jensen, Nathan K. Johnson, Jake Jones, Carl Kalbfleisch, Ken King, Laura Kirilloff, Debbie Kirkpatrick, Detra Klas, Anthony J. Kordosky, Greg L. Laird, Amanda Lambert, Lauren Lambert, Austin Lambert, Benjamin T. Landgraf, Chris Landino, Terri Langford,

Jason Lankford, Crystal Lawson, Wayne Lee, Sean Lefton, Mary Little, Trudy Lucas, Lisa Maberry, Josh Marr, Catherine Matuella, Patsy Mauldin, Dusty Wayne Mayer, William Mayer, Traci McCarthy, Kathleen McClure, Kathleen McClure, Karla McDonald, Larry McDonald, Toya McEwen, Alan Lee McKelva, Patrick Neal McNutt, Lauren McNutt, Amy Meyer, Josh Miller, Caitlyn Miller, Davida Miorin, Michael J. Mitchusson, Makayla Moore, Angela Moreau, Brad Morgan, Mary Morgan, Jason Morin, Amarise Morris, Andronica Morris, Cindy R. Munson, Amin Musani, Shirley Musani, Lucy Myer, Jason Lee Naramor, Mitaj Nathwani, Shanon Neal, Danny Thomas Nichols, Chris Nicoloff, Marie Nixon, Paul Nixon, Rose Marie Nixon, Tera Norris, Erica Northrup, Brent Omdahl, Angie Onley, Melinda Ortley, Bonita L. Overbey, Tyler Overstreet, Jeff Overstreet, Shelby Overstreet, Paula Overstreet, Martha Paben, Angela Patton, Melisa Patzer, Holland Paula, Jody Perry, Shelly Prewitt, Joshua D. Price, Lindsay Price, Ray H. Purdom, Kathy Raner, Justin Neal Raner, Alan Redd, Richard Reeves, Patsy A. Reeves, Kevin Diaz Reyes, Kylynn Robinson, Brad Robnett, Brad Rucker, Brian Russell, Anoo Sathappun, Jim Schermbeck, Bradley J. Schnitker, Marci Schnitker, Mary J. Scott, Kent Sharp, David Smith, Angela Smith, Derek Smith, Kyle Smith, Darlene L. Smith, Jeff Randall Spencer, Cynthia Annk Spencer, Drew Springer, Sara Sprinkle, Bobby Overbey Sr., Kristy Stachmus, Penny Stahl, Roxanne Standerfer, James Stewart, Leah Stewart, Patricia Ann Stewart, Alice Faye Stewart, Alice Stewart, Shana Stonebarger, Stephanie Strawn, Chandler Strawn, Sathappun Subbiah, James Sutherland, Thomas Leland Taylor, Shawn C. Teamann, Alyssa Thomas, Dana Thornhill, Julie Travis, Kristi Utley, Brittany Verhoek, Marilyn Sue Vest, Becky Vincent, Mark Vodry, Kimberly Vodry, Leonard G. Waldrum, John Ward, Cameryn P. Warren, Jared Weaver, William Webster, Rudy Weems, Cynthia Weems, Cynthia L. Weems, Casey Weinmann, Monique Whaley, Steve Whaley, Joseph White, Edward Whitfield, Monica L. Whitfield, Jennifer Williamson, Jeffrey Wilmoth, Kevin Wilson, Matt R. Yamarino, Angela Zarallo, Tracie Zweifel-Gibson, Austin Sumrall, Cynthia Zinn, Erica Ross, Jennita Wingate, John Harrison, Lainie Ramsay, Renata Richardson, Robert Sanchez, Robin Sears, Terry Rainbow, Susan Powell, Angela Onley, Borming Wang, Kenneth J. King, Sara Salinas, Elizabeth Rocamontes)

RESPONSE 29: The TCEQ appreciates the comments and interest from the public in environmental matters before the agency and acknowledges the comments in opposition and support of the project. The TCAA establishes the TCEQ's jurisdiction to regulate air emission in the state of Texas. Accordingly, the Executive Director's staff has reviewed the permit application in accordance with the applicable state and federal law, policy and procedures, and the agency's mission to protect the state's human and natural resources consistent with sustainable economic development. The TCEQ cannot deny authorization of a facility if a permit application contains a demonstration that all applicable statutes, rules, and regulations will be met.

COMMENT 30: Miscellaneous / Comments to the Applicant

Commenters expressed general concern that the proposed plant would impact national security. Multiple commenters referenced a letter to the TCEQ from Lieutenant Governor Dan Patick. Commenters commented about an issue involving the High Roller Group. Jerry Dean Hestand asks what the legacy of this facility will be. Lisa Flaggert expressed concern that the company will cause natural disasters. Steve Miller expressed concern about other companies and plants that have had explosions in the past. Several commenters asked about the impact to the electrical grid. Katerina Hess

states they don't need any more environmental favors from the government. Several commenters provided comments that were religious in nature. Several commenters raised concerns about criminal activity. Robert Bauer commented that plants should not be allowed to sneak in the back door because existing laws are insufficient to stop it. Several commenters asked about involvement from other state and federal agencies. J. Renfro expressed concern regarding various superfund sites in Texas. Linda Carol Crain asks how much money has changed hands to get officials to push the permit through. Delfina Prisock expressed concern about tremors caused by fracking activities. Several commenters raised concerns about monetary compensation to the surrounding community.

David Smith and Sathappun Subbiah expressed concern that the TCEQ does not have a medical professional approving the permit beyond a federal guideline. David Smith asks for access to state funding so that they can 'investigate this power grab in our small community.' Mr. Smith asks that Texas Legislatures work with TCEQ to review requirements for both air and water permits for oversights and other environmental protections. Mr. Smith expressed concern that the proposed plant would block internet and broadband signal. Mr. Smith submitted a copy of a protection of Federal Funds and National Security letter, as well as a letter from the City of Dorchester which opposes all permits requested from the TCEQ, FAA, EPA, and other local, state, and federal government agencies. Mr. Smith requests that the TCEQ require the Applicant to post a bond due to what he states is a potential for interference with administration of the CHIPS Act.

Group A commenters state that the company represented themselves to the community as a small business. Robin Sears asks if Oklahoma residents have been involved in the process. Matthew Petz asks if anybody has been compensated for their vote. David G. Sileven asks how impacted citizens could seek legal action

(Group A, Robert Bauer, James Matt Cooper, Linda Carol Crain, Atul Dave, Wes Davidson, Bethany Devore, Deirdre Diamond, Judy Searcy Dryden, Judith S. Dryden, Michael Fannin, Lisa Flaggert, Kit Grice, Austin Grooms, Ginger Ham, Katerina Hess, Jerry Dean Hestand, Laura T. Hunt, Suzanna Dryden Jensen, Ken King, Geri V. King, Julie Lanicek, Les McConnell, Vivian Robin McCoy, Steve Miller, Sarah Myrick, Brent E. Omdahl, Jeffrey Tyler Overstreet, Jeff Overstreet, Zach Poling, Lindsay Price, Ray H. Purdom, J. Renfro, Marci Schnitker, David Smith, Sathappun Subbiah, Becky Vincent, Mark Vodry, Manual Watson, Angela Zarallo)

Comments to the Applicant

Judy Searcy stated that any experienced or responsible applicant should know accuracy matters for an application, and that being careless raises red flags that misinformation could be intentional to draw less attention to the permit request and avoid close scrutiny by the TCEQ. Michael Fannin asks the Applicant to withdraw their application. Don Horn asks the Applicant why they bought over 600 acres of land. Jim Schermbeck asks about future ownership plans of the company and future operations.

Lari Alexis Taylor-Barker expressed concern regarding representations on the Applicant's website, asking how they will reduce their carbon footprint, commenting that the website lacks a detailed plan beyond praising Texas and vague promises to minimize pollution, and asks how the Applicant will fulfill their website claims. Ms.

Taylor-Barker asks the Applicant has a dedicated research and development team to explore innovative technologies to differentiate themselves from other cement plants.

David Smith expressed concern that the Applicant may have the intention to sell their construction permit. Mr. Smith asks the Applicant what they will do if they are unable to comply with the total hydrocarbon and organic hazardous air pollutant limits found in the draft permit. Mr. Smith asks the Applicant if they will commit to never pursue a permit for burning waste. Mr. Smith asks the Applicant where else in the application the Applicant made 'generous assumptions' in estimating their emissions.

Manual Watson commented that a public announcement from the company detailing the operating plans has not been made. Cynthia Reyes commented that if the project was a good idea, the town would have been notified by the company themselves.

(Michael Fannin, Don Horn, Liberty Johnson, Jim Schermbeck, Judy Searcy, David Smith, Lari Alexis Taylor-Baker, Manual Watson, Cynthia Reyes, Robin Sears, Matthew Petz, Kaaren J. Teuber, David G. Sileven)

RESPONSE 30: These comments are either outside the scope of the air permit review or addressed to the Applicant and are therefore included for completeness but not addressed by the Executive Director as they are not within the scope of this air permit review.

CHANGES MADE IN RESPONSE TO COMMENT

No changes to the draft permit have been made in response to public comment.

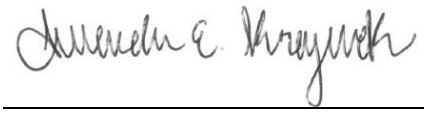
Respectfully submitted,

Texas Commission on Environmental Quality

Kelly Keel, Executive Director

Phillip Ledbetter, Director
Office of Legal Services

Charmaine Backens, Deputy Director
Environmental Law Division



Amanda Kraynok, Staff Attorney
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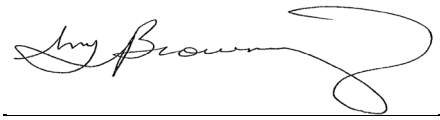

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REPRESENTING THE
EXECUTIVE DIRECTOR OF THE
TEXAS COMMISSION ON
ENVIRONMENTAL QUALITY

BM Dorchester LLC

Registration Nos. 167047, GHGPSDTX212, and PSDTX1602

APPENDIX A

COMMENT GROUP A:

Bobby N. Overbey	Larry Vincent	Robert E. Dryden
Tim Overbey	Robert Welch	Cindy Risk
Jason Lankford	Elizabeth Jones	Naif J. Risk
Heather Portsche	Ray M. Joseph	Sunni Hayes
Zach Poling	Terry Wildman	Suzanna Dryden Jensen
Jimmy Vincent	Carolyn Wildman	

COMMENT GROUP B:

Ashley A.	Cecilia Agulto	George Ambatt
Kathy Aaron-Raner	Amarachi Aguwa	Jay Amer
Felicia Abbott	Rhiannon Ailand	Ethan Anderson
Matthew Ables	Jeanne Ailand	Kari Anderson
Jill Ables	Locke Aimee	Pamela Anderson
John Ables	Kathleen Alexander	Christy St Andre
Mati Abner	Natalie Alexander	Jill Angelichio
Carrie Abrahamsen	Madison Alexander	Kristina Angell
Deanna Acker	Kimberley Alford	Shama Ansari
Kassandra Acuna	Amen Ali	Christina Antonio
Mary Adams	Ishrat Ali	Victoria Archuleta
Debbie Adams	Michelle Allan	Chris Arden
Randy Adams	Erica Allen	Esmeralada Argueta
Sharon Adams	Andrea Allen	Liz Armenta
Elizabeth Adell	Frank Allen	Ken Armer
Kilee Adley	Andrew Allison	Billy Ray Armstrong
Rojan Agahi	Helen Alogaidy	Melissa Armstrong
Ryan Agee	Carter Altman-Kao	Shirley Arrington
Elizabeth Aguilera	Apryl Alycox	Katrina Arsenault

Austin Atherton
Zeshan Atiq
Kathryn Atkins
Nicklas Aune
Sonja Aune
Saw Thiha Aung
Pansy Aung
Sophia Ayala
Bailey Ayers
Jerry Ayers
Heather B.
Kasie Babb
Theresa Baca
M. Badger
Charles Bae
Krystal Baker
Tiffany Baker
Brian Baker
Natalie Baker
Carolyn Baldwin
Laura Ballard
Willies Ballou
Gerri Bandemir
Roger Banerjee
Debra Banks
Geneva Banks
M.J. Barnard
Bambi Barnes
Diane Barnes
Anna Barnes
Bob Barnes
Carl Barnes
Melissa Barr
Faith Barrett
Sara Barrett
James Barth
Brianna Bassett
Meredith Bates
Krysta Bates
Khaliun Batsaikhan
James Beard
Julie Bearden
Mason Beaver
James Beaver
Branson Beaver
Sharon Beaver
Nelson Beaver
Ashley Beck
Carol Beck
Marlena Beckner
Freddie Beckwith
Mirza Begg
Ashley Bell
Marchelle Bell
Cassandra Belt
Brittany Bennett
Bret Bennett
Beverly Bennett
Stephanie Berger
Chris Berger
Brindi Berger
Ben Berkebile
Jennifer Berrier
Jackie Besinger
Savanna Bibb
Tonya Bingham
Rene Birchall
Ekjot Birdi
Tanya Bishop
Susan Bivens
David Black
Michelle Blackmon
Spring Blagg
Mariene Blake
Bill Blakeley
Donna Blakley
Sean Blayney
Amanda Blue
Paula Bodie
Crissy Bolt
Nancy Bond
Chris Bonilla
Sara Boone
David Boring
Stacey Born
Kristina Bosek
Jennifer Bossen
La Tisha Bostock
Knox Bounds
Nicole Bowden
Anna Bowen
Allison Bowen
Leah Bower
Lauren Bowles
Daniel Bowles
Teresa Bowles
Ruth Bowling
Jack Boyd
Elijah Boydstun
Laura Brackett
Gemma Bradford
Gaylen Brannon

Kristopher Bravo
Gay Brennan
Keysa Brest
Kim Brewer
Ashlin Bridwell
Melissa Broadway
Jerod Brockelm
Shirley Brodess
Shelley Bronowitz
Courtlyn Brooks
Stephanie Brooks
Susan Brooks
Andrew Brown
Trevor Brown
Chester Brown
Megan Brown
Audra Brown
Jacki Brown
Roger Brown
Douglas Brown
Terri Brown
Tracy Browning
Tiffany Broyles
Gwen Broyles-Smith
Victoria Bryan
Darby Bryant
Carrie Bryner
Susan Buchanan
Jamie Buckalew
Emma Buckalew
Lauren Buckner
Bianca Bullard
Jennie Bullard
Kelly Bumpass
Diane Burdine
Eric Burgess
Jerry Burk
Kathy Burk
Afton Burkard
James Burke
Brenda Burke
John Burkholder
Lou Burkholder
Kiandra Burkley
Melody Burks
Erica Burnett
Marie Burns
Rochelle Burris
Allison Burris
Chessica Burton
Syretha Bush
Teresa Bussey
Brenna Butler
Michael Button
Mildred Bynum
Royce Bynum
Greg Bynum
Syliva Byrd
John Byrom
Candice C.
Grace Cacho
Kristi Cady
Barbara Cagle
Laura Caldwell
Thomas Caligiuri
Jennifer Caligiuri
Jill Call
Lecia Callahan
Dawn Camacho
Erin Camalari
Taylor Camarillo
Sandra Campbell
Toni Campbell
Eric Cantu
Saya Car
Seth Caraway
Colleen Caraway
Tricia Cardinal
Denise Carey
Morgan Carey
Lynn Carin
Joe Carley
Myranda Carney
Jo Carney
John Carpenter
Eddie Carpenter
Courtney Carrera
Amber Carter
Jessica Carter
Sylvia Carter
Meagan Carver
Melissa Casco
Mary Cassol
Elizabeth Castillo
Alan Castillo
Hector Castro
Kevin Cavanaugh
Bob Cena
Luis Chacon
Anupama Chalasan
Nicole Chambers
Camille Chan

Patrick Chance
Derek Chandler
Daniel Chandler
Gina Chandler
Kristin Chandler
Megan Chandler
Manish Chandrakar
Destiny Chapman
Peyton Chapman
Rojellio Chavarria
Kevin Cheairs
Renukumar Chebro
Eddie Cheshier
Diana Chiappetta
Chinma Chikwe
Shauna Chilcoat
Jeremy Chisum
Regina Chisum
P. Christian
Chris Christian
Rita Christiansen
Cara Christianson
Kisha Christman
Mary Ciani
Vashti Clark
Paige Clark
Kevin Clark
Donnese Clark
Irina Clayton
David Clegg
Susan Clegg
Denise Clement
Adrian Cleveland
Ryan Clevenger
Bethany Clifton
James Clifton
Collin Climie
Kim Clopton
Jim Cockrill
Theresa Coffeey
Tami Coffey
Amanda Coffey
Nathan Coffman
Dane Coker
Angie Cole
Beverly Cole
Tim Cole
Debra Coleman
Sarah Colgrove
Gabrielle Collie
Dana Collie
Justin Collins
Maddie Collins
Kujtime Collins
Robert Collins
Nicole Compton
Tammy Conaway
Sheri Conn
Hollie Conner
John Connolly
Amy Contreras
Kristie Conway
Judith Conway
Angela Cook
Tony Cook
Julie Cook
Jim Coonrod
Eric Corder
April Corder
Christin Cormier
Michael Corn
Stephanie Cotton
Ashleigh Coulter
Anna Counts
Kacie Counts
Dusty Coupwood
Shirley Covington
Abi C.P.
Camryn Craddock
Tammy Cragg
Danielle Crain
Amanda Crawford
Kelsey Crawley
Heather Creek
Carla Croft
Melissa Croney
Jessica Crosson
Ray Croteau
Noel Crotty
Robert Crotty
Cristy Crovella
Adina Crow
Cindy Crumpley
Dia Cruz
Jenna Cryer
Laura Cuellar
Elisebeth Cuevas
Barbara Cumbess
Don Cummings
Gary Cummings
Karen Cummings
Krystle Cunningham

Matt Cunningham
Tammy Cunningham
Tina Cupps
Tracy Curry
Laura Curtis
Holland Curtis
Travis D.
Kirshan Dadlani
Richard Dahl
Bryan Daniel
Ben Daniel
Kyle Daniel
Gregg Daniel
Carla Dansby
Kambria Dansby
Angela Davidson
Nancy Davies
Alicia Davis
Phillip Davis
Brandi Davis
Betty Davis
Cyndy Davis
Jessica Davis
Jordan Davis
Karla Davis
Ryan Davis
Shawna Dawson
Amy Day
Laura Deaton
Billye Decker
Erin Defreitas
Brian Delano
Alyssa Delashaw
Jody Deleon
Kevin Deleu
Laurie Deleu
Zane Delgadillo
Araceli Delgado
Matthew Delgado
Jackeline Delgado
Shelbi Delgado
Michael Delplato
Marianne Demoss
Charity Denaker
Scott Denham
Jordann Dent
Austyn Depaola
Tonya Derichsweile
Deveshree Desai
Brian Desmot
Sheila Devdas
Ben Dever
Bethany Devore
Jeremy Devore
Mary Devore
Sara Dick
Rhonda Dick
Megan Dillard
Kevin Dimarco
Melissa Dimarco
Amber Disessa
Bill Dixon
Taylor Doak
Melissa Doan
Carter Doan
Eric Doan
Margaret Doan
Russell Dobbs
Meagan Dodson
Christopher Dolan
Penni Dolton
Mike Donaldson
Linda Donie
Karen Donohoe
Mary Dorcey
Nick Dorrell
Ashley Dorris
Marcos Dos
Tillman Doty
Srikrishna Dowlapa
Keri Downs
Sadie Dozier
Jana Draughn
Elizabeth Dromgool
Michael Drynan
Gloria Dubose
Pamela Duffy
Taylor Dugan
Courtney Dunlap
Christina Dunlap
Timothy Dunlap
Marlee Dunn
Nancy Dunnahoe
Mary Dunning
Peggy Durden
Joanna Duree
Laura Duree
Brandi Durham
George Durham
Johnny Durrant
Sarah Durrow
Kinjan Dusara

Carmen Dutton
Alex Duuring
Lena Dziedzic
Debbie E.
Deanna Earnhart
Erin Earwood
Courtney Edgren
Amanda Edwards
Rebecca Edwards
Peggy Efird
Nicole Eidsvoog
Steve Elkins
Katelyn Elliott
Karen Ellis
Carolyn Ellison
Hadden Elms
Sally Emerick
Todd Empcke
Karen Empcke
Ryan Emrick
Anne Engel
Kelli Engle
Alisha Enox
Kathern Erickson
Do Ersch
Stephanie Escando
Jose Espitia
Mckenzie Essman
Trelly Estem
Cynthia Estrada
Kathy Ethridge
Gene Evans
Tom Evans
Shelby Evans
Paloma Everett
Emily Everhart
Amber Ewalt
Dana Fady
Bishoy Faheim
Patty Fair
Garrett Faison
Sherrie Falls
Cody Fantaine
Dillon Farrell
Barbara Farrell
Jesse Farrer
Morgan Feickert
Matthew Fejeran
Lori Felder
Valerie Fendley
Cassie Feo
Relda Feudo
Megan Fillinich
Nancy Finch
Laura Fincher
Ryan Fincher
Sylvia Finnegan
Brian Fischer
James Flanery
Adam Fleming
Kiley Fleming
Lynn Fletcher
Melissa Fletcher
Michael Flewallen
Cherilyn Flood
Ian Flood
J. Flood
Joshua Flores
Lydia Flowers
Sheri Folkes
Eric Folkes
Lynzee Ford
Tessa Foremaan
Lisa Foster
Sally Foster
Cynthia Fouts
Katie Fouts
Sarah Franchetti
Stephen Franchetti
Karie Franklin
Robert Franze
Sheryl Fraze
Christian Freeman
Carrie Frith
Madeleine Fritz
Sandra Fronhofer
Sara Fuchs
Beth Fuller
Tori Fuquay
Stefano Fuschetto
Cody Futch
Leah Futrell
C. G.
Carissa Gabbert
Sai Pavan Gadagan
Doris Gallagher
Shanna Gallinoto
Ashley Gann
Reinag Garcia
Alysia Garcia
Ruby Garcia
Beverly Garcia

Mary Garcia
Gabriel Gardner
Sofia Gardner
Christi Gardner
Tina Gardner
Suresh Garlapati
Stephanie Garner
Amanda Garner
Marco Garza
Buisisiwe Gcabashe
Michael Geddie
Mike Geldon
Amy George
Daniel Gerardo
Collin Gervais
Vicki Ggudgel
Abdul Ghafoor
Patrick Gibbs
Sarah Gibbs
Channon Gibson
Melissa Gibson
Toya Gideon
Carissa Gilbreath
Ashlee Giles
Eric Giles
Shelly Gillert
Bobbie Gilreath
Holly Glendale
Randy Goble
Donna Godbey
Greg Godfrey
Laurel Godlove
Jenn Gomez
Natalee Gomez
Alexander Gonzalez
Victoria Gonzalez
Laci Gonzalez
Regina Gonzalez
Maryna Good
Rosa Goodenow
Ashley Goodloe
Monique Goodwin
Thea Gordon
Cindy Gordon
Ellen Gordon
Amy Gorg
Kasey Gormley
Chris Gothard
Becky Goza
Margaret Graf
Anabelle Graham
Everett Graham
Bobby Graham
Boone Graham
Pam Graham
Meg Graham
Bryan Graham
Maria Donna Graham
Ruthie Graham
Molly Graham-Scott
Greyson Grandstaff
Tiffani Grantham
Deb Gray
Mindy Grayson
Brandy Green
Charlee Green
D. J. Green
Linda Greenfield
Jennifer Greer
Tammy Griffin
Rachel Griffin
Tricia Grigg
Beverly Grogan
Terika Grogan
Robert Grogan
Rachel Grooms
Torsten Groos
William Gross
Rod Gross
Andrea Grutchfield
Tyler Guest
Elizabeth Gunderse
Yanissa Gutierrez
Allison Gutschlag
Katja Gwin
Chase H.
Sahana Hade
Candace Haggard
Vince Haggard
Lauri Hainsfurther
Natalie Hair
Krishna Halageri
Shelli Hales
Gayle Hall
Holly Hall
Joseph Hall
Teresa Hall
Debbie Halliburton
Katherine Halliburton
Dale Hamilton
Carolyn Hamilton
Gary Hamilton

Grayson Hamilton
Mary Hamilton
David Hamm
Sandra Hammond
Mary Hammontree
Stacia Haney
Joshua Hansen
Grace Hanson
Rizwan Haque
Larry Harbin
Hollie Harbin
Laurie Harden
Emily Hardwick
Alexandria Hardy
Ben Hardy
Barry Hare
Christine Hare
Gary Harker
Alannah Harkins
James Harmon
Rick Harmon
Alyssa Harper
Colin Harrell
Preslee Harrell
Chanteria Harris
Sephanie Harris
Tammy Harris
Leslie Harris
Amy Harris
Cathy Harris
Morgan Harris
Nancy Harris
Stephanie Hart
James Hartless
Liz Hartshorn
Heather Harvey
Mary Sheffield Hast
Kathy Haxel
Donna Hayden
Edna Hayes
Aileen Hays
Marius Hays
Kate Hearn
Chris Heaslip
Sarah Heaslip
Donna Heckelsberg
Jodi Heckman
Lisa Hejny
Moses Hejny
Dustin Helm
Julie Henderson
Alyssa Hernandez
Martina Hernandez
Madalyn Hernandez
Jacqueline Hernandez
Jennefer Hewitt
Tara Hickerson
Brandon Hickerson
Angie Hickey
Cindy Hicks
Marycarol Hicks
Janice Hicks
Celeste Hidrogo
Eli Hilbert
Brandi Hill
Michelle Hill
Michael Hill
Debbie Hill
Katlynn Hill
Derek Hines
Adam Hite
Jenni Hofherr
Emily Hohenstein
Justin Holbert
Mary K Holicky
E. J. Holland
Paula Holland
Heather Holle
Robin Holmes
Zayn Honcu
Garfield Hooper
Elizabeth Hooper
Kathi Hope
Marcia Hopkins
Kaylee Hopy
Kristy Horkman
Melanie Horn
Charity Horne
Logan Houser
Robert Houston
Mary Houston
Michelle Hovey
Deb Howard
Jaida Howard
Jessica Howard
Aleta Howell
Cathy Hoyns
Brittany Hudgens
Kayla Huey
Daniel Huff
Jennifer Huff
Misty Hughes

Sarah Hulshouser
Samantha Humphrey
James Hunt
Peter Hunt
Maryam Hussain
Brody Hust
Elise Hust
Carlie Hutchison
Alyssa Hutson
Thomas Hutson
Malissia Hysmith
Lea I.
Aminah Ibrahim
Billie Ingram
Julie Ingram
Debbie Jackson
Tammy Jackson
Veranica Jackson
Tyler Jacob
Jeanne Jacobs
Rasheed Jamal
Denise James
Thomas Jamison
Rachel Jenkins
Terry Jenkins
Trish Jennings
Suzanna Jensen
Susan Jensen
Abigail Jewell
Asim Jilani
Henry Jimenez
Vickie John
Eric Johns
Angela Johnson
Nathan Johnson
Paul Johnson
Coryann Johnson
Kyle Johnson
Logan Johnson
Koryel Johnston
Vic Johnston
Karla Johnston
Jennifer Jolly
Annamae Jones
Matt Jones
Lindsay Jones
Ashely Jones
Beverly Jones
Bobbie Jones
Hope Jones
Jasey Jones
Jeremy Jones
Megan Jones
Rachel Jones
Renatta Jones
Jorge Jorge
Austin Joss
Denbie Judkins
Cheryl Julian
Tempie Juliano
Sheila Jurgens
Anni Kaeser
Hardik Kalathiya
Mande Kalbfleisch
John Kanouse
Sunil Kapur
Don Keene
Gloria Keimer
Landon Keizer
Heather Keizer
Amy Keller
William Keller
Jessica Kelly
Tricia Kelton
Brittany Kennedy
Jennifer Kennemer
Tyler Kerr
Caleb Kershner
Laneca Kesler
Emily Key
Amit Khanolkar
Lani Khing
Jennifer Kiesendahl
Eunice Kim
Annamarie King
Sandra King
Karen King
Olivia King
Donald Kinsey
Jacqueline Kiok
Brent Kirby
Richard Kirby
Jennifer Kitkowski
Peggy Klas
Brittany Klausmann
Kara Kleinert
Susie Klimaszewski
David Kline
Vanetta Klok
Margaret Kloppers
Elizabeth Knapp
Tiata Knight

Sarah Knight
Bonnie Koenig
Erick Kohler
Alwyn Koil
Srinivasa Komiriset
Bhagyalakshmi Kon
Spandana Kondeti
Marion Kopulos
Gwen Koskinen
Eva Krause
Thomas Boland Kro
Misty Kruger
Danielle Krusing
Leann Kuhn
Dhawal Kumar
Andrea Kysor
Jody Lafoy
Terri Laird
Greg Laird
Pui Lam
Lauren Lambert
Robert Lance
Dakota Landers
Arin Lane
Rhonda Lane
Shirley Lane
Dayanna Lang
Julie Lang
Stacy Langley
Eric Langmaack
Jason Lankford
Cameron Lankford
Tanya Lankford
Samantha Larcomb
Tara Laroche
Theresa Larsen
Estee Larson
Denise Lassberg
Dustin Latham
Lanell Latona
Alissa Lavin
Evan Lavin
Annaliese Lavin
Christine Lavin
Scott Lavin
Rhonda Lawrence
Tonja Lawson
Jessie Leach
Colleen Leahy
Kaylee Leal
Diane Leatherwood
Rachel Lee
Deborah Lee
Matt Lees
Sean Lefton
Kyndra Lemke
Zackary Lemons
Debye Leon
Lorraine Leon
Carol Leverett
James Lewellen
Jenni Lewis
Billie Lewis
Dawn Lichtenwalter
Mickey Liddeke
George Light
Kylee Likarish
Garry Lilly
Cheri Lilly
Dennis Lilly
Elizabeth Lilly
Renee Lind
Heather Liner
Jill Lingmann
Melissa Linnenburg
Kelley Linton
Lori Linton
Courtney Liston
Blake Liston
Chris Little
Robert Littlejohn
Brooke Logan
Brian Lohri
Buba Long
Ryan Long
Mary Beth Lopez
Vanessa Lopez
Elizabeth Lopez
Chris Lopez
Chad Lorenz
Rachel Lorenz
Cheryl Loucks
Chris Loughry
Beth Lowry
Jessica Lowry
Melinda Loyd
Cindy Lu
Carol Lucas
De Luce
Janeen Ludecke
Jan Lully
Noel Luttmer

Jacquie Luttmer
Amy Lutton
David Lyday
Billy Lynch
Keely Lynch
James Lynch
Kassie Lynch
Kirk Lynch
Shaun Lynch
Narayan Madabusi
Shashi Magadi
Barb Magaster
Siddhartha Mahara
Catherine Majors
Julisa Maldonado
Lauran Maloney
Joseph Mangum
Michelle Maple
Johnny Mapp
Baker Marc
Lydia Marcillonis
Jamie Marcillonis
Paul Markillie
Crystal Marmaduke
Wes Marmaduke
Charles Marshal
Dior Marshall
Christy Martin
Jarod Martin
Deborah Martin
Justin Martin
Kelsey Martin
Lara Martin
Sylvia Martin
Tonya Martinek
Marisa Martinez
Troy Mask
Tiffany Maske
Leslie Mason
Sydney Mason
Theresa Massey
Glenda Mata
Marshall Mathews
Nancy Mathews
Robyn Mathews
James Mathis
Rexanne Mattei
Toria Matthews
Charlotte Matthews
Tim Matthews
Tierra Matthews
Dannell Matus
Lyssa Maxwell
Dusty Mayer
Julie Mayo
Cherice Mayo
Leslie Mayo
Matthew Mayo
Kristen Mccanlies
Michael Mccarthy
Kim McClinton
Grant Mcclure
Kathleen Mcclure
Nat Mcclure
Sean Mcclure
Riley Mccollum
Patricia McCormish
Ashley McCracken
Terri Mccrary
Lisa Mcdonald
Paige McDonald
Noelle Mcdonald
Jason Mcelroy
Lisa Mcelyea
Toya Mcewen
Chasity Mcfarland
Kaitlin Mcfatridge
Steve Mcgee
Stephanie McGinnis
Gavin McGlynn
Mikayla Mcguffin
Windsor Mcintosh
Emily Mcintyre
Rachel Mckee
Lauren McKillip
Caitlin Mckinney
Tim McKinney
Laurel Mckinney
Chelsea Mcknight
David Mcmahan
Diana Mcmahan
Jennifer McMahon
Gayle Mcmanus
Cindy Mcnallen
Gary Mcnew
Neal Mcnutt
Maryellen McNutty
Anjanette McPeters
Lora McWhorter
Branden Measles
Ashle Measles
Rick Measles

Chris Medaris
Melinda Medders
Valerie Meeks
Tanya Mehalko
Jennifer Meinen
Andrew Melonakos
Kenneth Melton
Brittany Melton
Terry Mendheim
Mary Menke
Kasey Mercer
Jeremy Merlo
Mark Merrill
Amanda Mershon
Stephanie Messick
Carol Metz
Wendy Metzger
Sheila Mexia
Isabelle Meyer
Marci Meyerhardt
Mandy Michael
Oscar Mike
Kiranmayi Mikkiline
Alex Milano
Jess Miles
Shari Miles
Ina Miller
Tom Miller
Wendy Miller
Robin Miller
Madison Miller
Kelly Mills
Kimberly Mills
Margaret Missler
Audra Mitchell
Larry Mitchell
Krisla Mitcheson
Trisha Mitcheson
Racheal Mobley
Alan Moctezuma
Blane Moffett
Connie Monk
Alan Monk
Danny Monk
Teresa Monk
Whitney Monk
Kali Montague
Suzann Montgomery
Tama Montgomery
Susan Moody
Eric Moon
Lisa Moore
Ashlen Moore
Reggie Moore
Emanuel Moran
Tiffany Moreland
Angela Moreno
Jennifer Morgan
Amanda Morgan
Mary Morgan
Donna Morrell
Kristy Morris
Justin Morris
Karen Morris
Michelle Morris
Shandi Morris
Samantha Morrison
Torrey Morrison
Marthann Morrow
Candice Morrow
Cynthia Morse
Mark Moss
Angel Mowdy
Misty Mozingo
Mindy Muellenborn
Shayna Mueller
Richard Muncell
Jenni Muncell
Brittney Mundorf
Susana Munoz
Casey Murch
Allison Murdock
Nicole Murphy
Shannon Murphy
Darren Murphy
William Murphy
Sarah Murrell
Hamsa Murugesan
Sarah Muscle
Ruth Mussaw
Candice Musser
Raye Fletcher Myer
Lynda Myer
Lyle Myers
Allison Myers
Jennifer Myers
Michael Myers
Steven Mygrant
Sarah Myrick
Michael Nagy
George Nail
Donna Nalley

Seshagiri Namuduri
Hanane Nassim
Leanne Nassoy
Vicki Nave
Claire Neago
Patricia Neal
Mary Neal
Ashley Ned
Paula Neely
Kiril Nekrich
Kenneth Nelms
Olivia Nelson
Benjamin Ng
Jamie Ngu
Andrew Nichols
Cindy Nichols
Darrell Nichols
David Nichols
Danielle Nicholson
Jason Nieves
Alice Nigl
Lisa Nix
Kim Noakes
Kimberli Noel
Wendy Noffsinger
Misty Nordhoff
Ahsley Norman
Jessica Norman
Karon Northington
Misty Nortman
Elizabeth Norton
Jason Norton
Colton Norvell
Julia Norvell
Angela Notter
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Leslie Nunley
Shelby O'brien
Gena Offill
Matdey Ogg
Brandi Oldaker
Beverly Oliver
Stacey Olmstead
Donna Olson
Kristian Omar
Kim Oneal
Antonio Orellana
Jacob Orellana
Talia Orellana
Tammy Orellana
Kalob Orellana
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Sergio Ortiz
Kathiria Ortiz
Robert Ortiz
Stephen Ortiz
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Bonita Overbey
Christina Overbey
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Katelyn Overstreet
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Alison Paulson
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Rhonda Pearson
John Peer
Kelsie Pell
Nick Pellman
Mark Pelzel
Maren Pelzel
Jose Perez
Ellie Perkins
Jennifer Perkins
Julie Perkins
Sherry Perrin
Salina Perry
Ganesh Perumalla
Anthony Peters

Donisha Peters
Susan Peters
Cheryl Petrosino
Matthew Petz
Teresa Pfeiffer
Bethany Phelps
Shannon Phillips
Pat Piaschyk
Teresa Pickerill
Michelle Pierce
Linda Pigg
Brent Piller
Harley Pinckney
Lisa Pinkett
Terri Pinkston
Amy Pixler
Rick Pledger
Lisa Plumlee
Gene Plumlee
Sahithi Pola
Cristina Pollard
Ricardo Ponce
Stacie Pope
Patricia Porini
Heather Portsche
Gordon Poston
Stacy Poteet
Hari Priya Potham
Trevor Powell
Bri Praslicka
Bobbie Pratt
Ricky Pratt
Serena Precht
Shannon Presley
Alana Preziosi
Josh Price
Bobbie Price
Jessica Price
Lindsay Price
Ricky Price
Jennifer Pritchett
Chelsea Pruitt
Diane Pruitt
Liz Pucci
Vibrance Pulla
Kimberly Pulliam
Carolyn D. Quick
Murminur Rahman
Ramesh Ramachan
Holly Ramage
Jennifer Ramirez
Emily Ramos
Ligia Ramos
Justin Raner
Paula Rangel
Rebecca Rathfon
Cindy Reames
Lora Redden
Nancy Reed
Faith Reed
Claudia Reed
Roy Reed
Tara Reed
Ryan Reeves
Patsy Reeves
Beck Regaldo
John Regan
Will Reid
Arliss Reilly
Jennifer Reilly
Allison Remy
J. Renfro
Johanna Reyes
Jeryl Reynolds
Shanna Reynolds
Madison Reynolds
Brandy Reynolds
Judith Reynolds
Gayle Rhinehart
Joanna Rhoton
Aly Rice
Khrystian Rice
James Rich
Nicole Rich
Rhonda Rich
Diana Richards
Ricardo Richards
Katerina Richardson
Amber Richardson
Sonya Richardson
Renata Richardson
David Richey
Alan Richins
James Richmond
Mika Richmond
Regina Richroath
Cody Riddle
Kandice Ridley
James Rigdon
Erika Rikhiram
Laurie Rilling
Nancy Riseman

Sarah Risko
Cheyenne Roach
Christina Robbins
Jenifer Roberts
Shannon Roberts
Joy Roberts
Mary Roberts
Michael Roberts
Cindy Robertson
Kylynn Robinson
Brandi Robinson
Melinda Robinson
Jonda Robison
Liz Rocamontes
Shannon Rodgers
Angela Macias Rodri
Fatima Rodriguez
Damian Roesler
Carl Rogers
Jadin Rogers
Nancy Rogers
Cindy Rogers
Derrik Rogers
Diane Rogers
Barbara Rohle
Taylor Rohrer
Jordan Romanchuk
Joe Roper
Zayra Rosario
Jennifer Ross
Jacque Ross
Haley Ross
Lynne Rossow
Shimen Rouhani
Mark Roundy
Wendi Roundy
Jeanne Rourke
Johonna Rowe
Kara Royston
Rachael Ruiz
Dennisse Ruiz-Adib
Amanda Runnels
Laurie Rushie
Jakie Rushing
Branda Rusk
Amber Russell
Jasara Russell
Allyson Russell
Ingrid Russell
Kieraney Rutherford
Valarie Rutherford
Michael Rutig
Terry Rutledge
Alexis Ryan
Lynea Ryan
Samuel Ryan
Amber Ryskamp
Gretchen Van Der S
Raoul Sainvil
Marisa Saltzgiver
Anna Sam
Lucy Sanders
Kevin Sanders
Kristin Sandlin
Usha Sara
Brenda Sarapao
Barbaros Sarici
Karabi Sarmah
Nick Sarro
Rachelle Satre
Margaret Scanten
Amber Schalla
Danielle Schindler
Kiley Schleusz
Joann Schnitker
Erin Schnitker
Leonore Schoen
Raegan Schofield
Melissa Schrodt
Linda Schrodt
Jeannie Schroeter
Justin Schultz
Whitney Schultz
Wendy Schumacher
Giovanni Sciarrino
Lisa Scott
Tracy Scott
Tina Scott
Lyndsi Scott
Mary Scott
Diane Seabolt
Ann Seago
Robin Sears
Dianna Seaux
Adam Sedgass
Whitney Sedgass
Racheal Sedmack
Jacki Self
Stephanie Servin
Andrew Serwood
Retha Sexton
Cassy Shafer

Phillip Shafer
John Shaffer
Brandan Sharp
Leslie Sharp
Brandi Shaver
Amy Sheffield
Sarfraz Sheikh
Montgomery Shelbi
Brittany Shelton
Christopher Sheltor
Steve Shepherd
Jill Sheppard
Kristi Shilling
John Shilling
Jonna Shores
Raedene Shorethose
Saad Siddiqui
David Sileven
Paula Silva
Rachel Simmons
Angie Simpson
Kyle Sims
Tammie Sims
Pamela Sims
Kenda Sinclair
Elizabeth Sizemore
Cindy Skaggs
Christopher Skinne
Mychal Skipworth
Matthew Slate
Terence Slate
Tia Slawson
Anthony Smalling
Terri Gero Smead
Elizabeth Smietana
Gloria Smiley
Richard Smiley
Julie Smith
Erin Smith
Joseph Smith
Romina Smith
Abram Smith
Kathy Smith
Kacie Smith
Nita Smith
Rodney Smith
Travis Smith
Vicki Smith
Willoughby Smith
Kathy Smithson
Julie Snapp
Debbie Snyder
Savannah Somers
Gerax Sotelo
Karen Souther
Wendi Spece
Glen Spellman
Emma Spencer
Julia Spencer
Mary Spencer
Amy Stacener
Sheryl Stacks
Leigh Staggs
Monique Staley
Roxanne Standerfer
Laine Standifer
Donna Stanford
Whitney Stanglin
Pollyanna Stanley
Natasha Stanley
Harlee Stanley
Glenna Starkey
Mark Starnes
Kathy Steele
Susan Steele
Gabrielle Stenovitch
Beau Stephens
Jeb Stephens
Craig Stephens
Sindy Stephens
Tara Stevens
Angela Stevens
Dennis Stewart
Hannah Stockton
Lisa Stokes
Jerry Stokes
Shana Stonebarger
Roger Storment
Lei Ann Stovall
Kathy Stoyer
Trey Strange
Jessica Strawn
Stephanie Strawn
Rick Streetman
John Strickland
Rebecca Stringfellow
Donna Stubberud
Anthony Sturdivant
Stephanie Sudiono
Alison Sullivan
Jeffrey Sullivan
Shelby Sumpter

Amy Sumpter
Kameron Sumrall
Austin Sumrall
Christina Sutherland
Clint Sutherland
Vanessa Sutter
Natasha Sutton
Diliza Svendsen
Connie Swamy
Reba Swanner
Siana Swift
Victoria Szemeredi
Martin Tadlock
Renea Talbert
Erin Talley
Rachel Tandy
Steve Tarr
Debbie Tatkowski
Cassandra Taylor
Wanda Taylor
Sabrina Taylor
Laura Taylor
Lindee Taylor
Harold Taylor
Anthony Taylor
Dewanna Taylor
Jeana Taylor
Kristi Taylor
Linda Taylor
Lydia Taylor
Mary Taylor
Terry Taylor
Thomas Taylor
Tisha Taylor
Zach Taylor
Deb Teague
Dennis Teague
Samantha Teague
Sara Teel
Sarah Thiers
Tiffany Thomas
Shaun Thomas
Whytney Thomas
Cindy Thompson
Bryan Thompson
Carlie Thompson
Teena Thompson
Constance Thompson
Tracy Thomson
Lori Thornhill
Virginia Tidwell
Hannah Tiffany
Richard Tiffin
Cynthia Tillett
Misti Todd
Drew Tolbert
Tan Tong
Christy De La Torre
Benjamin Torres
Maria Torres
Robert Towers
Casey Towles
Bryan Townsend
Amy Trahan
Robyn Trantham
Angela Trask
Heather Travis
Kim Travis
Jeff Travis
Gary Travis
Baylee Travis
Everley Trice
Kelly Trott
Tonya Troxtell
Myrna Trubey
Courtney Truhitte
Irena Tsoustas
Michele Tucker
Taylor Tucker
Joanne Turner
Linda Tuttle
Charles Underwood
Riley Underwood
Kim Upton
Kristi Utley
Adela Valdez
Elizabeth Van Valke
Chad Van Valkenbu
Shana Valmidiano
Jamie Vandagriff
Kathleen Vanderbee
Willie Vanderpool
Mickinze Vanherpen
Bill Vannoy
Cynthia Vannoy
Ashley Vannucci
Kim Vargas
Paul Varghese
Lauren Vasquez
James Vaughan
Bri Vaughn
Anita Vaught

James Vaught
Ian Vazquez
Octavio Vela
Miriam Vela
Michele Velasco
Omar Velez
Sarah Vellotti
Hema Vengala
Erin Verdun
Jordan Verhoek
Sara Vidrine
Shubha Vijayasarat
Christina Villyard
Destity Vincek
Becky Vincent
Kelli Vincent
Steve Vissering
Tim Voertman
Allison Volpe
Jenny Vonbehren
Jenn Vondersaar
Jalyn De Vore
Bobbie Voyles
Laney W.
Rhonda Wade
Avery Wageman
Erin Wageman
Claire Wageman
Cathy Walger
Victoria Walke
Matthew Walker
Kyle Walker
Kendra Wall
Darby Wallace
Earnest Waller
Nathan Waller
Rachel Waller
Lillie Walston
Zachary Walston
Beth Ward
Brian Ward
John Ward
Kimberly Ward
Mingyan Ward
Robert Ward
Karen Ward
Kaitlin Ward
Kari Ward
Heather Warden
Robin Warfield
Karyn Warr
Misty Warren
Colin Warren
Kevin Wasp
Trisha Watkins
Logan Watson
Leann Watson
Stacy Watson
Dana Watts
Shelbie Watts
Thomas Watts
Jessica Watts
Mark Wei
Casey Weinmann
Lynn Lynn Welch
Melinda Welch
Scott Welch
Khenya Welch
Holly Wells
Brenda Wells
Stacy Wells
Dana Wessels
Jami West
Joanny West
Kelly West
Carolyn West
Kati Wetzel
Cathy Whiddon
Howard Whiddon
April Whiddon
Kayla Whitacre
Isaac Whitaker
Alex White
Ken White
Richard White
Lisa Whitley
Christine Whitmore
Thomas Whitmore
Kim Wilcox
Kemp Willard
Christopher Willhite
April Williams
Carma Williams
Kerrington Williams
Ryan Williams
Terah Williams
Tonia Williams
Jennifer Williams
Dustin Williams
Jordyn Williams
Grace Williams
Norm Wilmes

Bryan Wilson
Elaine Wilson
Taffney Wilson
Wendy Wilson
Abi Wilson
Nikki Wilson
Drew Wilson
Angela Wilson
Jennita Wingate
Cathy Winkler
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Crystal Winters
Brett Winton
Michael Wise
Karen Witcher
Blake Wofford
Darla Wogan
Collin Wolff
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Coline Wood
Hannah Woodard
Coni Wooster
Joan Wooster
Erica Worley
Natalie Worth
Ronell Wright
Kenya Wright
Kaitlyn Wyatt
Krista Wynn
Jake Wynn
Rainer Yakich
Kaelan Yakich
Matt Yamarino
Shelly Yancey
Linda Yankle
Teresa Yeager
Troy Yosten
Kerry Young
Nathan Young
Katharine Young
Vishal Z.
Alejandra Zamora
Matthew Zimmerman
Macy Zinn
Hayley Zinski

BM Dorchester LLC

Registration Nos. 167047, GHGPSDTX212, and PSDTX1602

Appendix B

Novin Abdi
Silvia Adams
Randy Adams
Janice Akins
Samantha Allison
Luz Arce
Amber Armendariz
Ralph H. Armstrong
Ralph Armstrong
Katrina Lynn Arsenault
Art Arthur
Charles Ashley
Amy Ashlock
Andrea Paulette Aslam
Sesily Babekuhl
David Baca
Keith Baehmann
Donald Bailey
Cynthia Baker
Tye Baker
Willies Ballou
Willies Carl Ballou
Debra Banks
Douglas Glenn Banner
Kelly Denise Barnes
Laura Barnett
Thomas Clay Barnett
Darla Barr
Faith Barrett
Kathy Bartlett
Robert Bauer
Mark Baumgardner
Heather Beaver
Ashley Beck
Francis Beck
Jennifer Beecroft
Blake C. Beeson
Patti Beggs
Deanna Bell
Gary Bennett
Darald Berger
Lander Bethel
Tonya Bingham
Liz Birchall
Cliff Blackstock
Ashley Blanton
Tammy Bohannon-Yule
James C. Boles
Nancy Bond
Nolan E. Bond
Linda Bowers
Paul David Bowers
Madilyn Bramer
Amber Bratt
Kristopher Daniel Bravo
Virginia Brawley
Ashlin Bridwell
Cheryl Brociek
Lorie Brockner
Ron Brockner
Ron R. Brockner
Bryan Brooks
Emily Brooks
Jan Broomall
Laffel Brown
Nancy Brown
Jeffrey Brown
Jeremiah Broyles
Tiffany Broyles
Jeremiah D. Broyles
Erika Bryan
Jamie Buckalew
Homer Bullard
Jennifer Bullard
Donna Burk
Marie Burns
Brenna Butler
Christa Call
Veronica Calzada
Sarah Campbell
Stephen Campeau

Eric Cantu
Tommy Joe Carney
Holly Castleberry
Clint Catching
Cary Catching
Paula A. Cavender
Shane Cavender
Andrew Cellars
Adam Cernero
Corey Chambers
Nicole Chambers
Bobby Luke Chandler
Kristin Chandler
Bobby Chandler
Megan C. Chandler
Laura Childress
Regina Chisum
Peter Christensen
Art Clayton
Robert Clough
Steve Thomas Cohea
Margaret Coleman
Lee Collins
Karla K. Colwell
Meghan Cone
Anthony Alan Cook
James Matt Cooper
Charli Cotten
Katie Courange
Eric Covder
R. D. Cozad
Skyler Cozad
Traber Cozad
Camryn Craddock
Cassady A. Craddock
Matthew Crain
Linda Carol Crain
Amanda Crawford
Andrew Crawford
James Crews
Melissa Gail Croney
Brian Culp
Donald Ray Cummings
Karen Cummings
Lindsay Cummings
Karen L. Cummings
Kristen Cunningham
Ethan Cunningham
Tracy R. Curry
Jeff Dailey
Atul Dave
Stephanie Davidson
Wes Davidson
Angela Davidson
Chanel Ann Davis
Cynthia L Davis
Dee F. Davis
H. C. Davis
Mark Davis
Alicia Davis
Jordan Taylor Davis
Julie Davis
Karla Graham Davis
Preston Davis
Bruce W. Dawsey
Bruce Dawsey
Shawna Dawson
Heidi Debner
Thomas G. Debner
Rebecca Demel
Bethany Devore
Jeremy Q. Devore
Jeremy Devore
Mary Gail Devore
Jeremy W. Devore
Deirdre Diamond
Joanne Dickey
Anthony Dimarco
Melissa Doan
Kimberly Stewart Dodson
Kathleen Dophied
Tiffany Drake
Judy Searcy Dryden
Robert E. Dryden
Judith S. Dryden
Searcy Dryden
Judy Dryden
Leslie M. Dulack
Michael Dulack
Christina N. Dunlap
Boyd Dunn
Sherry Duran
Cindy Durrant
Mark L. England
William Engle
Angelica Escalera
Cendy Y. Escalera
Blanca Nayeli Escalera-Solis
Rachel Evans
Michael Fannin

Barrett Fannin
Jesse Farrer
Phillip Wayne Farris
Stanley Feld
Courtney Fierro
Laura Fincher
Lisa Flaggert
Lisa Marie Flaggert
James N. Flanery
Adam Fleming
Bobby Fletcher
Lindsey Flores
William Foster
Harold C. Foster
Harold Foster
Robert Franze
Frank Edward Gadek
Andrea Ganow
Chris Gardner
Lori Gardner
Renny Gehman
Tracy Gilbert
Connor Gillispie
Rex Glendenning
Paula Glenn
Donald E. Godwin
Roberto Gonzalez
Patricia C. Gonzalez
Rosa Goodenow
Lora Gordon
Margie Graf
Anabelle Graham
Mayan Grantland
Amber Gravley
Jeffrey Neal Gray
Misty Gray
Laura Green
Linda J. Greenfield
Kit Grice
Kenneth Griffin
Austin Grooms
Brandon Grooms
Chloe Grooms
Rachel Grooms
Joshua Grooms
Richard Oran Gross
Matt Gudgel
Hillary Gurnea
Jennifer Haeg
Teresa M. Hall
Damon L. Moore Hall
Ginger Ham
Dave Hammond
Matt Hardenburg
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Letitia Harris
John Harrison
Jim L. Harvey
Rod Hawkins
Stephanie Hawkins
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Moses Hejny
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Sarah Henry
Joann Hensley
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Alyssa Hernanadez
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Jerry Dean Hestand
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Melissa Hill
Melinda Hill
Amy Hoffman-Shehan
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Helen Horton
Sherry Howard
Gabe Howell
Joyce A. Huff
Jen Huff
Alice Hughes
Meghan Hughes
Mandy Hummel
Laura T. Hunt
Colin Drew Hunter
Linda K. Hunter
Lori Huntsman
Debbie Hurd
Brody Hust
Billie Ingram
Billie Charels Ingram
Heather Jacques

Mike Jacques
Phyllis D. James
Michael Jefferson
Rachel Jenkins
Chris Jennings
Trish Jennings
Suzanna Dryden Jensen
Brandon Johnson
Liberty Johnson
Linda Kay Johnson
Nathan K. Johnson
Carrie Jones
Elizabeth Jones
Lori Jones
Jake Jones
Debbie Elaine Judkins
Carl Kalbfleisch
Mary Karam
Kenyon Kemp
Dina Kenemore
Brittany Kennedy
James Kimbrel
Cody M. King
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Angela Zarallo
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Savanna Zinn
Cynthia Zinn
Tracie Zweifel-Gibson

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 15, 2025

TO: All Interested Persons

RE: BM Dorchester LLC
Air Quality Permit Nos. 167047, GHGPSDTX212, and PSDTX1602

Enclosed with this letter are instructions to view the Executive Director's Response to Public Comment (RTC) on the Internet. Individuals who would prefer a mailed copy of the RTC or are having trouble accessing the RTC on the website, should contact the Office of the Chief Clerk, by phone at (512) 239-3300 or by email at chiefclk@tceq.texas.gov.

Should you have any questions, please contact Ellie Guerra of the Texas Commission on Environmental Quality's Office of the Chief Clerk (MC 105) at (512) 239-3329.

Sincerely,

Laurie Gharis

Laurie Gharis
Chief Clerk

LG/erg

Enclosure

EXECUTIVE DIRECTOR'S RESPONSE TO PUBLIC COMMENT
for
BM Dorchester LLC
Air Quality Permit Nos. 167047, GHGPSDTX212, and PSDTX1602

The Executive Director has made the Response to Public Comment (RTC) for the application by BM Dorchester LLC for Air Quality Permit Nos. 167047, GHGPSDTX212, and PSDTX1602, available for viewing on the Internet. You may view and print the document by visiting the TCEQ Commissioners' Integrated Database at the following link:
https://www.tceq.texas.gov/goto/cid

In order to view the RTC at the link above, enter the TCEQ ID Number for this application (167047, GHGPSDTX212, or PSDTX1602) and click the "Search" button. The search results will display a link to the RTC.

Individuals who would prefer a mailed copy of the RTC or are having trouble accessing the RTC on the website, should contact the Office of the Chief Clerk, by phone at (512) 239-3300 or by email at chiefclk@tceq.texas.gov.

Additional Information

For more information on the public participation process, you may contact the Office of the Public Interest Counsel at (512) 239-6363 or call the Public Education Program, toll free, at (800) 687-4040.

A complete copy of the RTC (including the mailing list), the complete application, the draft permit, and related documents, including comments, are available for review at the TCEQ Central Office in Austin, Texas. Additionally, a copy of the permit application, executive director's preliminary decision, draft permit, and the executive director's preliminary determination summary and executive director's air quality analysis, will be available for viewing and copying at the TCEQ Central Office, the TCEQ Dallas/Fort Worth Regional Office, and at the Howe Community Library, 315 South Collins Freeway, Howe, Grayson County, Texas. The facility's compliance file, if any exists, is available for public review at the TCEQ Dallas/Fort Worth Regional Office, 2309 Gravel Drive, Fort Worth, Texas.

Translate Documents Using Google Translate

You can translate documents up to 10 MB in any of these formats: .docx, .pdf, .pptx, .xlsx. PDF files must be 300 pages or less. To translate more documents or larger documents, learn about the Cloud Translation API[1].

Important: Document translation isn't available on smaller screens or mobile (cell phones). You can find text in images and scanned .pdf pages in the output document but they aren't translated.

1. In your browser, go to Google Translate[2].
2. At the top, click **Documents**.
3. Choose the languages to translate to and from.
4. To automatically set the original language of a document, click **Detect language**.
5. Click the blue **Browse your computer** button.
6. Select the file you want to translate.
7. Click **Translate** and wait for the document to finish translating.
8. Click **Download translation** to download your translated document.
9. Get more information at Translate documents & websites - Computer - Google Translate Help[3].

Translate Documents using Microsoft Translator

1. Open document in Word.
2. Select **Review** > **Language** > **Translate** > **Translate Document**.
3. Select a language to conduct the translation.
4. Select **Translate**. A copy of the translated document will open in a separate window.
5. Select **OK** in the original window to close translator.
6. Get more information at Microsoft Translator for Personal Use - Microsoft Translator[4].

[1] https://cloud.google.com/translate
[2] https://cloud.google.com/translate
[3] https://support.google.com/translate/answer/2534559?hl=en&co=GENIE.Platform%3DDesktop&oco=1
[4] https://www.microsoft.com/en-us/translator/personal/

COMISIÓN DE CALIDAD AMBIENTAL DE TEXAS

Protegiendo a Texas mediante la Reducción y Prevención de la Contaminación

15 de abril de 2025

PARA: Todas las personas interesadas.

RE: BM Dorchester LLC
Calidad del Aire Permiso Nos. 167047, GHGPSDTX212, y PSDTX1602

Se adjuntan a esta carta las instrucciones para ver en Internet la Respuesta del Director Ejecutivo al Comentario Público (RTC). Las personas que prefieran una copia por correo del RTC o que tengan problemas para acceder al RTC en el sitio web, deben comunicarse con la Oficina del Secretario Oficial, por teléfono al (512) 239-3300 o por correo electrónico a chiefclk@tceq.texas.gov.

Si tiene alguna pregunta, comuníquese con Ellie Guerra de la Oficina del Secretario Oficial de la Comisión de Calidad Ambiental de Texas (MC 105) al (512) 239-3329.

Atentamente,

Laurie Gharis

Laurie Gharis
Secretaria Oficial

LG/erg

Recinto

RESPUESTA DEL DIRECTOR EJECUTIVO AL COMENTARIO DEL PÚBLICO
para
BM Dorchester LLC
Calidad del Aire Permiso Nos. 167047, GHGPSDTX212, y PSDTX1602

El Director Ejecutivo ha puesto a disposición de Internet la respuesta al comentario público (RTC) para la solicitud de BM Dorchester LLC del Calidad del Aire Permiso Nos. 167047, GHGPSDTX212, y PSDTX1602. Puede ver e imprimir el documento visitando la Base de Datos Integrada de los Comisionados de TCEQ en el siguiente enlace: https://www.tceq.texas.gov/goto/cid

Para ver el RTC en el enlace anterior, ingrese el número de identificación TCEQ para esta solicitud (167047, GHGPSDTX212, o PSDTX1602) y haga clic en el botón "Buscar". Los resultados de la búsqueda mostrarán un enlace al RTC.

Las personas que prefieran una copia por correo del RTC o que tengan problemas para acceder al RTC en el sitio web, deben comunicarse con la Oficina del Secretario Oficial, por teléfono al (512) 239-3300 o por correo electrónico a chiefclk@tceq.texas.gov.

Información adicional

Para obtener más información sobre el proceso de participación pública, puede comunicarse con la Oficina del Asesor de Interés Público al (512) 239-6363 o llamar al Programa de Educación Pública, al número gratuito, (800) 687-4040.

Una copia completa del RTC (incluida la lista de correo), la solicitud completa, el borrador del permiso y los documentos relacionados, incluidos los comentarios, están disponibles para su revisión en la Oficina Central de TCEQ en Austin, Texas. Además, una copia de la solicitud del permiso, la decisión preliminar del director ejecutivo, el permiso preliminar, el resumen de la determinación preliminar del director ejecutivo y el análisis de calidad del aire del director ejecutivo estarán disponibles para su visualización y copia en la Oficina Central de la TCEQ, la Oficina Regional de TCEQ en Dallas/Fort Worth y en la Biblioteca Comunitaria de Howe, 315 South Collins Freeway, Howe, Condado de Grayson, Texas. El archivo de cumplimiento de la instalación, si existe alguno, está disponible para revisión pública en la Oficina Regional de TCEQ en Dallas/Fort Worth, 2309 Gravel Drive, Fort Worth, Texas.

Traducir documentos usando Google Translate

Puede traducir documentos de hasta 10 MB en cualquiera de estos formatos: .docx, .pdf, .pptx .xlsx. Los archivos PDF deben tener 300 páginas o menos. Para traducir más documentos o documentos más grandes, obtenga información sobre la API de traducción en la nube[1].

Importante: La traducción de documentos no está disponible en pantallas más pequeñas o móviles (teléfonos celulares). Puede encontrar texto en imágenes y escanear .pdf páginas en el documento de salida, pero no se traducen.

1. En tu navegador, ve a Google Translate[2].
2. En la parte superior, haga clic en **Documentos**.
3. Elija los idiomas a los que desea traducir y desde.
4. Para establecer automáticamente el idioma original de un documento, haga clic en **Detectar idioma**.
5. Haga clic en el botón azul **Examinar el equipo**.
6. Seleccione el archivo que desea traducir.
7. Haga clic en **Traducir** y espere a que el documento termine de traducirse.
8. Haga clic en **Descargar traducción** para descargar el documento traducido.
9. Obtén más información en Traducir documentos y sitios web - Ordenador - Ayuda de Google Translate[3].

Traducir documentos con Microsoft Translator

1. Abra el documento en Word.
2. Seleccione **Revisar** > **idioma** > **Traducir** > **traducir documento**.
3. Seleccione un idioma para realizar la traducción.
4. Seleccione **Traducir**. Se abrirá una copia del documento traducido en una ventana separada.
5. Seleccione **Aceptar** en la ventana original para cerrar el traductor.
6. Obtenga más información en Microsoft Translator para uso personal - Microsoft Translator[4].

[1] https://cloud.google.com/translate
[2] https://cloud.google.com/translate
[3] https://support.google.com/translate/answer/2534559?hl=en&co=GENIE.Platform%3DDesktop&oco=1
[4] https://www.microsoft.com/en-us/translator/personal/

MAILING LIST / LISTA DE CORREO
BM Dorchester LLC
Air Quality Permit Nos./ Calidad del Aire Permiso Nos. 167047, GHGPSDTX212, and/y PSDTX1602

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Jacob Bender, Chief Financial Officer
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Michael Meister, Principal Consultant
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INTERESTED PERSONS /
PERSONAS INTERESADAS:

See attached list. / Ver lista adjunta.

FOR THE EXECUTIVE DIRECTOR /
PARA EL DIRECTOR EJECUTIVO
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por correo electrónico:

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VAN ALSTYNE TX 75495-8112

BROOMALL , JAN
ILLUMINED CROSSING LLC
500 GARVER RD
MANSFIELD OH 44903-7554

BROWN , LAFFEL
262 MORMAN GROVE RD
SHERMAN TX 75092-6912

BROWN , NANCY
262 MORMAN GROVE RD
SHERMAN TX 75092-6912

BROWN , PAUL L
262 MORMAN GROVE RD
SHERMAN TX 75092-6912

BROWN , ROGER
PO BOX 441
POTTSBORO TX 75076-0441

BROWN , DR. JEFFREY
COHERENT
6800 S US HIGHWAY 75
SHERMAN TX 75090-3490

BROYLES , JEREMIAH
PO BOX 160
TOM BEAN TX 75489-0160

BROYLES , TIFFANY
PO BOX 160
TOM BEAN TX 75489-0160

BROYLES, TIFFANY & NEWTOWN,SARAH
5013 ASPEN WAY
SHERMAN TX 75092-7078

BROYLES, TIFFANY & NEWTOWN,SARAH
PO BOX 160
TOM BEAN TX 75489-0160

BROYLES , JEREMIAH D
409 MEADOWS ESTATE ST
WHITEWRIGHT TX 75491-6106

BROYLES , TIFFANY
409 MEADOWS ESTATE ST
WHITEWRIGHT TX 75491-6106

BRYAN , ERIKA
HOWE MIDDLE SCHOOL
300 BEATRICE ST
HOWE TX 75459-4554

BUCKALEW , JAMIE
1558 WATSON RD
WHITESBORO TX 76273-5544

BULLARD , HOMER
APT 412
301 S HERITAGE PKWY
SHERMAN TX 75092

BULLARD , JENNIFER
1495 TAYLOR RD
HOWE TX 75459-2511

BURK , DONNA
516 PATRICIA DR
SHERMAN TX 75090-6636

BURNS , KERRY
720 S WESTERN HILLS DR
HOWE TX 75459-2868

BURNS , MARIE
720 S WESTERN HILLS DR
HOWE TX 75459-2868

BUTLER , BRENNA
1731 BUSINESS HIGHWAY 377
WHITESBORO TX 76273-7176

BYER , CLYDE & LANDA
158 KENNEDY RD
SHERMAN TX 75092-6945

CALL , CHRISTA
2149 COUNTY ROAD 151
GAINESVILLE TX 76240-1535

CALZADA , VERONICA
692 PILOT GROVE RD
WHITEWRIGHT TX 75491-7170

CAMPBELL STEVENS , SARAH
1712 W MCGEE ST
SHERMAN TX 75092-3202

CAMPEAU , STEPHEN
600 WILLIAMS WAY
VAN ALSTYNE TX 75495-2885

CANTU , ERIC
1264 TERRY LN
SHERMAN TX 75092-5883

CARNEY , TOMMY JOE
1370 HARSHBARGER RD
SADLER TX 76264-3966

CARR , CASEY D
1002 CATALINA DR
BELLS TX 75414-3421

CASTLEBERRY , TANNER
3979 STEWART RD
HOWE TX 75459-1729

CASTLEBERRY , HOLLY
3979 STEWART RD
HOWE TX 75459-1729

CATCHING , CHAD
9050 FM 902
HOWE TX 75459-2402

CATCHING , CLINT
HOWE ISD
105 W TUTT ST
HOWE TX 75459-4702

CATCHING , CARY
9050 FM 902
HOWE TX 75459-2402

CAVENDER , ROBERT
2933 FM 902
SHERMAN TX 75090-5673

CAVENDER , PAULA A
2933 FM 902
SHERMAN TX 75090-5673

CAVENDER , SHANE
2933 FM 902
SHERMAN TX 75090-5673

CAYWOOD , DORA
137 STARK LN
SHERMAN TX 75090-3402

CELLARS , ANDREW
TX
1829 HORSESHOE LN
VAN ALSTYNE TX 75495-4481

CERNERO, ADAM & MORGAN,BRAD
SHERMAN ISD
2701 N LOY LAKE RD
SHERMAN TX 75090-1701

CHAMBERS SR , COREY
1717 ENTERPRISE RD
SHERMAN TX 75092-5802

CHAMBERS , NICOLE
1717 ENTERPRISE RD
SHERMAN TX 75092-5802

CHANDLER , BOBBY
144 SAGE BRUSH LN
DENISON TX 75021-4250

CHANDLER , BOBBY LUKE
6575 MACKEY RD
DORCHESTER TX 75459-2467

CHANDLER , DANIEL
89 HARMON CIR
DORCHESTER TX 75459-2430

CHANDLER , KRISTEN & KRISTEN
6575 MACKEY RD
HOWE TX 75459-2467

CHANDLER , KRISTEN & KRISTEN
6575 MACKEY RD
HOWE TX 75459-2467

CHANDLER , MEGAN C
89 HARMON CIR
DORCHESTER TX 75459-2430

CHILDRESS , LAURA
PO BOX 249
VAN ALSTYNE TX 75495-0249

CHISUM , REGINA
2200 COUNTY ROAD 155
WHITESBORO TX 76273-5634

CHRISTENSEN , MR PETER
1085 LEXINGTON LN
ESTES PARK CO 80517-7570

CLAYTON , ARTHUR
STE 116A
200 S CROCKETT ST
SHERMAN TX 75090-7170

CLOUGH , MR ROBERT
7312 EASLEY DR
MCKINNEY TX 75071-1566

COHEA , STEVE THOMAS
1620 N HOARD AVE
SHERMAN TX 75090-4019

COLE , BEVERLY
3212 MIMOSA DR
SHERMAN TX 75092-3411

COLEMAN , MRS MARGARET
335 RIBBONWOOD TRL
COLLINSVILLE TX 76233-2003

COLLINS , TERRY
108 ROCKPORT RD
SHERMAN TX 75092-6967

COLLINS , MR LEE
188 GREEN MEADOW CT
GUNTER TX 75058-3183

COLWELL , KARLA K
1640 PLEASANT HOME RD
SHERMAN TX 75092-7907

CONE , MEGHAN
3413 JACKSON DR
MCKINNEY TX 75070-9552

CONE , MEGHAN
SHERMAN INDEPENDENT SCHOOL DISTRICT
2701 N LOY LAKE RD
SHERMAN TX 75090-1701

COOK , ANTHONY ALAN
400 WILLIAM ST
POTTSBORO TX 75076-7813

COOPER , CLIFF
2593 FORD RD
HOWE TX 75459-2427

COOPER , JAMES MATT
252 FOREST HILLS CIR
GUNTER TX 75058-3195

COTTEN , CHARLI
75 LAUGHLIN RD
SHERMAN TX 75092-6942

COTTEN , LORI
32 PRESTON MEADOWS RD
SHERMAN TX 75092-6961

COULSON , TURNER
STATE REPRESENTATIVE REGGIE SMITH
300 N TRAVIS ST
SHERMAN TX 75090-5925

COURANGE , KATIE
1102 CEDAR ST
HOWE TX 75459-4414

COVDER , ERIC
23 SOUTHFORK DR
SHERMAN TX 75090-3510

COZAD , R D
944 ROCKPORT RD
SHERMAN TX 75092-6904

COZAD , SKYLER
952 ROCKPORT RD
SHERMAN TX 75092-6904

COZAD , TRABER
LONE BUCK FARM
3069 OLD DORCHESTER RD
SHERMAN TX 75092-7013

CRADDOCK , CAMRYN
1483 TAYLOR RD
HOWE TX 75459-2511

CRADDOCK , CASSADY A
1483 TAYLOR RD
HOWE TX 75459-2511

CRAIN , LINDA CAROL
CRAIN FARMS BCS PARTNERSHIP
13011 FM 902
DORCHESTER TX 75459-2015

CRAIN , MATTHEW
13011 FM 902
DORCHESTER TX 75459-2015

CRAWFORD , MRS AMANDA
1983 BALLARD RD
VAN ALSTYNE TX 75495-3071

CRAWFORD , MR ANDREW
513 ARIZONA ST
SHERMAN TX 75090-9103

CREWS , MR JAMES
385 MAIN ST
DORCHESTER TX 75459-2475

CRONEY , MS MELISSA GAIL
327 PRESTON MEADOWS RD
SHERMAN TX 75092-6955

CROSTHWAITE , TREY
639 WESTWOOD DR
SHERMAN TX 75092-5666

CULP , BRIAN
657 HIDDEN LAKES BLVD
GUNTER TX 75058-3242

CUMMINGS , MR DONALD RAY
117 LAUGHLIN RD
SHERMAN TX 75092-6943

CUMMINGS , KAREN
117 LAUGHLIN RD
SHERMAN TX 75092-6943

CUMMINGS , MRS KAREN L
4205 HARVEST HILL CT
CARROLLTON TX 75010-4116

CUMMINGS , LINDSAY
1721 TAPADERO LN
CELINA TX 75009-6366

CUNNINGHAM , ETHAN
680 BELMONT LN
VAN ALSTYNE TX 75495-7013

CUNNINGHAM , KRISTEN
2230 COLD CREEK DR
DENISON TX 75020-0867

CURRY , MRS TRACY R
1480 OLD GUNTER HWY
SHERMAN TX 75092-6931

CURTIS , MARIE
901 N DENNY ST
HOWE TX 75459-3707

DAILEY , JEFF
924 CALDER ST
HOWE TX 75459-4651

DAVE , ATUL
2814 MIDDLETON DR
MELISSA TX 75454-9776

DAVIDSON , ANGELA
1720 BLEDSOE RD
GUNTER TX 75058-3197

DAVIDSON , STEPHANIE
2612 SILVERADO TRL
SHERMAN TX 75092-4520

DAVIDSON , MR WES
GLOBITECH INC
200 W FM 1417
SHERMAN TX 75092-8002

DAVIS , CHANEL & JUSTYN
6123 HIGHWAY 289
DORCHESTER TX 75459-2081

DAVIS , CHANEL ANN
6123 STATE HIGHWAY 289
DORCHESTER TX 75459-2081

DAVIS , CYNTHIA L
407 W MESQUITE ST
GUNTER TX 75058-2065

DAVIS , DEE & H C
37 CHOCTAW EST CIR
SHERMAN TX 75092-6975

DAVIS , MARK
266 TEE TAW CIR
SHERMAN TX 75092-6999

DAVIS , ALICIA
6301 FARMINGTON RD
HOWE TX 75459-2815

DAVIS , JORDAN TAYLOR
111 W DAVIS ST
HOWE TX 75459-4709

DAVIS , JULIE
1613 MCDOUGALL CRK
VAN ALSTYNE TX 75495-8109

DAVIS , KARLA GRAHAM
266 TEE TAW CIR
SHERMAN TX 75092-6999

DAVIS , PRESTON
709 E CENTENNIAL ST
SHERMAN TX 75090-8417

DAWSEY , BRUCE W COUNTY JUDGE
GRAYSON COUNTY
STE 15
100 W HOUSTON ST
SHERMAN TX 75090-6019

DAWSON , SHAWNA
1231 TERRY LN
SHERMAN TX 75092-5812

DEBNER , HEIDI
622 MIDWAY ACRES DR
HOWE TX 75459-2490

DEBNER , MR THOMAS G
622 MIDWAY ACRES DR
HOWE TX 75459-2490

DELANO , BRIAN
1308 SHEPHERD RD
SHERMAN TX 75090-3433

DEMEL , REBECCA
1612 SAN CARLOS DR
VAN ALSTYNE TX 75495-2683

DEMOSS , MARIANNE
1357 VERNON ST
BELLS TX 75414-2450

DEVORE , MRS BETHANY
6386 MACKEY RD
DORCHESTER TX 75459-2504

DEVORE , JALYN
6386 MACKEY RD
DORCHESTER TX 75459-2504

DEVORE , JEREMY Q
CITY OF ALLEN
6386 MACKEY RD
DORCHESTER TX 75459-2504

DEVORE , MARY
11451 FM 902
DORCHESTER TX 75459-2415

DEVORE , MARY GAIL
11015 FM 902
DORCHESTER TX 75459-2413

DEVORE , JEREMY
6386 MACKEY RD
DORCHESTER TX 75459-2504

DEVORE , JEREMY W
6386 MACKEY RD
DORCHESTER TX 75459-2504

DIAMOND , DEIRDRE
2105 BLEDSOE RD
GUNTER TX 75058-3015

DIAMOND , DEIRDRE
7100 WIND ROW DR
MCKINNEY TX 75070-8625

DIAZ REYES , KEVIN
320 MONTROSE DR
VAN ALSTYNE TX 75495-8271

DICKEY , JOANNE
PO BOX 456
HOWE TX 75459-0456

DIMARCO , ANTHONY LLOYD
DIMARCO AVIATION SERVICES INC
2908 CANYON CREEK DR
SHERMAN TX 75092-4474

DOAN , MRS MELISSA
42 WAGON WHEEL TRL
SHERMAN TX 75092-6981

DOBBS , NANCY
121 ROCKPORT RD
SHERMAN TX 75092-6968

DODSON , MRS KIMBERLY STEWART
1214 BOERNE DR
CEDAR PARK TX 78613-5945

DONOHOE , JAMES
211 E COLLEGE ST
GUNTER TX 75058-9725

DONOHOE , MRS MARY LYNN
211 E COLLEGE ST
GUNTER TX 75058-9725

DOPHIED , KATHLEEN
125 JARON DR
POTTSBORO TX 75076-7052

DOUGLAS , BOB
373 S WACO ST
VAN ALSTYNE TX 75495-2816

DOUGLAS , CINDI
PO BOX 2018
VAN ALSTYNE TX 75495-2018

DRAKE , TIFFANY
PO BOX 3508
SHERMAN TX 75091-3508

DRYDEN , JUDY SEARCY
JJ TRUST
6 RUE DU LAC ST
DALLAS TX 75230-2834

DRYDEN , ROBERT E
4627 CHEROKEE TRL
DALLAS TX 75209-1915

DRYDEN , JUDITH S
JJ TRUST
PO BOX 2189
ADDISON TX 75001-2189

DRYDEN , MR SEARCY
APT 6C
1060 5TH AVE
NEW YORK NY 10128-0104

DULACK , MRS LESLIE M
7015 FARMINGTON RD
SHERMAN TX 75092-7032

DULACK , MICHAEL
FIDELITY
7015 FARMINGTON RD
SHERMAN TX 75092-7032

DUNCAN , LARRY JOE
703 N DENNY ST
HOWE TX 75459-3581

DUNLAP , CHRISTINA N
MFD LIVESTOCK
2882 FM 901
WHITESBORO TX 76273-7441

DUNN , BOYD
11831 FM 902
DORCHESTER TX 75459-2421

DUNN , BOYD & SHIRLEY
6053 STATE HIGHWAY 289
DORCHESTER TX 75459-2079

DURAN , SHERRY
197 MAIN ST
DORCHESTER TX 75459-2471

DUREN , JULIER
441 PRESTON MEADOWS RD
SHERMAN TX 75092-6954

DURRANT , CINDY
10200 COOLIDGE DR
MCKINNEY TX 75072-8803

ELLIOTT , MICHAEL JOSEPH
7V RANCH MICHAEL ELLIOTT
20975 FM 902
COLLINSVILLE TX 76233-3739

ENGLAND , MARK L
GLOBALWAFERS AMERICA GLOBITECH
200 W FM 1417
SHERMAN TX 75092-8002

ENGLE , WILLIAM
2020 PARK RDG
DENISON TX 75020-7361

ESCALERA , MRS ANGELICA
619 STEWART RD
SHERMAN TX 75092-6505

ESCALERA , CENDY Y
403 BEAVERS DR
SHERMAN TX 75092-6395

ESCALERA-SOLIS , BLANCA NAYELI
619 STEWART RD
SHERMAN TX 75092-6505

EVANS , LINDA
1717 TAYLOR RD
HOWE TX 75459-2500

EVANS , WILLIAM
1717 TAYLOR RD
HOWE TX 75459-2500

EVANS , RACHEL
243 BRANDON WAY
POTTSBORO TX 75076-3635

FANNIN , MICHAEL
2255 OLD SCOGGINS RD
HOWE TX 75459-1786

FANNIN , BARRETT
FANNIN TREE FARM
2255 OLD SCOGGINS RD
HOWE TX 75459-1786

FARRER , JESSE
456 STARK LN
SHERMAN TX 75090-3405

FARRIS , MR PHILLIP WAYNE
20 STARK LN
SHERMAN TX 75090-3401

FELD , CECELIA
7310 HILLWOOD LN
DALLAS TX 75248-5240

FELD , STANLEY
951 N WASHBURN RD
BELLS TX 75414-3505

FIERRO , COURTNEY
365 ROCKPORT RD
SHERMAN TX 75092-6965

FINCHER , LAURA
1549 TIMBERCREEK DR
HOWE TX 75459-2887

FLAGGERT , LISA MARIE
GRACE FARMS MINITURE THERAPHY HORSES
130 GREEN RD
SHERMAN TX 75092-7962

FLANERY , JAMES N
1001 N JOHN DOUGLAS RD
VAN ALSTYNE TX 75495-5144

FLEMING , ADAM
173 SPAIN RD
VAN ALSTYNE TX 75495-2705

FLETCHER , BOBBY
1890 PLEASANT HOME RD
SHERMAN TX 75092-7906

FLORES , LINDSEY
PO BOX 14
VAN ALSTYNE TX 75495-0014

FOSTER , HAROLD C
495 STARK LN
SHERMAN TX 75090-3406

FOSTER , SALLY
13044 FM 902
DORCHESTER TX 75459-2014

FOSTER , WILLIAM
13044 FM 902
DORCHESTER TX 75459-2014

FRANZE , ROBERT
243 PEGGY LN
GUNTER TX 75058-3158

FULLER , BETH
1371 VERNON ST
BELLS TX 75414-2450

GADEK , MR FRANK EDWARD
DE
5501 BELLO VISTA DR
SHERMAN TX 75090-9263

GANOW , ANDREA
1519 MARILEE CT
HOWE TX 75459-2822

GARDNER , CHRIS
721 LOGANS WAY DR
PROSPER TX 75078-2529

GARDNER , LORI
721 LOGANS WAY DR
PROSPER TX 75078-2529

GATYLORD, JOHN & GAYLORD,LINDA
6507 JOYCE LN
SHERMAN TX 75092-9718

GEHMAN , MRS RENNY
36 HIDDEN LAKES BLVD
GUNTER TX 75058-3232

GILBERT , TRACY
612 LEGEND LN
SHERMAN TX 75092-5420

GILLISPIE , CONNOR
1801 CLEGG ST
HOWE TX 75459-2916

GLENDENNING , REX
PRESTON BEND LP
STE 100
12400 PRESTON RD
FRISCO TX 75033-6400

GLENN , PAULA
1135 LEO ANDREWS RD
WHITESBORO TX 76273-7472

GODWIN , DONALD E
GODWIN INVESTMENTS LTD
STE 1100
500 N AKARD ST
DALLAS TX 75201-3302

GONZALEZ , PATRICIA C
1G CAPITAL LLC
4441 EDMONDSON AVE
DALLAS TX 75205-2603

GONZALEZ , ROBERTO
VIEJO LAND AND ASSETS
1515 E LANE ST
LAREDO TX 78040-7245

GOODENOW , ROSA
2974 FM 901
WHITESBORO TX 76273-5314

GORDON , LORA
924 N 3985 RD
BOSWELL OK 74727-9366

GORDON , LORA
607 SPERRY RD
DORCHESTER TX 75459-2117

GRAF , MARGIE
2109 AJAY
SHERMAN TX 75092-4632

GRAHAM , DONNA
56 RED RD
HOWE TX 75459-3543

GRAHAM , ANABELLE
204 S EUBANKS ST
TOM BEAN TX 75491-3583

GRANTLAND , MAYAN
509 W COLLINS ST
DENISON TX 75020-7655

GRAVLEY , MRS AMBER
389 STEWART RD
SHERMAN TX 75092-6503

GRAY , JEFFREY NEAL
264 MIDWAY ACRES DR
HOWE TX 75459-2484

GRAY , MISTY
39 R L FRANKS RD
DENISON TX 75021-7145

GREEN , LAURA
93 RAMS LN
SHERMAN TX 75092-6989

GREENFIELD , LINDA J
99 HONEYSUCKLE LN
SHERMAN TX 75092-7094

GRICE , ANITA
658 CHOCTAW EST CIR
SHERMAN TX 75092-7928

GRICE , KIT
658 CHOCTAW EST CIR
SHERMAN TX 75092-7928

GRIFFIN , KENNETH
GRIFFIN FARMS
3926 MACKEY RD
HOWE TX 75459-2450

GRIGG , TRICIA
1628 N BINKLEY ST
SHERMAN TX 75092-3521

GROOMS , AUSTIN
1668 MARY FITCH RD
SHERMAN TX 75090-5210

GROOMS , BRANDON
1668 MARY FITCH RD
SHERMAN TX 75090-5210

GROOMS , CHLOE
1668 MARY FITCH RD
SHERMAN TX 75090-5210

GROOMS , JOSHUA
1668 MARY FITCH RD
SHERMAN TX 75090-5210

GROOMS , RACHEL
1668 MARY FITCH RD
SHERMAN TX 75090-5210

GROSS , MR RICHARD ORAN
306 TEE TAW CIR
SHERMAN TX 75092-7900

GUDGEL , MATT
13006 FM 902
DORCHESTER TX 75459-2014

GURNEA , HILLARY
386 HIGH COUNTRY RD
SHERMAN TX 75092-6852

HAEG , JENNIFER
1452 BREWER LN
CELINA TX 75009-3830

HALES , MARK & SHELLI
1344 CYPRESS POINT DR
GUNTER TX 75058-3217

HALL , TERESA M
HALL'S HIVES
PO BOX 35
SOUTHMAYD TX 76268-0035

HAM , GINGER
1330 FORD RD
SHERMAN TX 75092-7012

HAMMOND , DAVE
2560 MISTY MEADOW DR
PROSPER TX 75078-9746

HANSEN , DAWN
805 MARY LEE LN
COLLINSVILLE TX 76233-1004

HARDENBURG , MATT COMMISSIONER PRECINCT 4
GRAYSON COUNTY
STE 15
100 W HOUSTON ST
SHERMAN TX 75090-6019

HARDENBURG , MATT COMMISSIONER PRECINCT 4
GRAYSON COUNTY
STE 116A
200 S CROCKETT ST
SHERMAN TX 75090-7170

HARDENBURG , MATT
PO BOX 585
POTTSBORO TX 75076-0585

HARDWICK , EMILY ANN
2607 S WESTRIDGE TRL
SHERMAN TX 75092-4766

HARDY , CAROL ANN
1910 JAMAICA LN
SHERMAN TX 75092-2311

HARPER, CHRIS & WHITE,A
407 S CHANDLER AVE
DENISON TX 75020-4301

HARRIS , LETITIA
3732 PARADISE WAY
SHERMAN TX 75090-5132

HARRISON , JOHN
103 CHRISSA DR
POTTSBORO TX 75076-7062

HARVEY , BRICE
PO BOX 622
HOWE TX 75459-0622

HARVEY , JIM & KATHERINE
PO BOX 625
HOWE TX 75459-0625

HARVEY , MR JIM L
PO BOX 625
HOWE TX 75459-0625

HAWKINS , ROD
140 HAWKS LANDING ST
HOWE TX 75459-4743

HAWKINS , STEPHANIE
140 HAWKS LANDING ST
HOWE TX 75459-4743

HAYES , SUNNI
497 RIDDELS RD
SHERMAN TX 75092-7936

HAYNE , ORVILLE
161 MAIN ST
DORCHESTER TX 75459-2471

HECK , CHRISTINE
1196 KESWICK DR
VAN ALSTYNE TX 75495-3359

HEDRICK , MRS PATRICIA
1426 MACKEY RD
HOWE TX 75459-2440

HEJNY , MRS & MRS LISA
813 SPERRY RD
HOWE TX 75459-2061

HEJNY , MRS & MRS LISA
813 SPERRY RD
HOWE TX 75459-2061

HEJNY , MOSES
PO BOX 3298
SHERMAN TX 75091-3298

HEJNY , MRS LISA
PO BOX 3298
SHERMAN TX 75091-3298

HEMMAN , BRYAN
2100 DEER RUN
GUNTER TX 75058-4222

HENRY , SARAH
558 CEDAR HILLS DR
DENISON TX 75021-4016

HENSLEY , JOANN
224 OLD GUNTER HWY
SHERMAN TX 75092-7944

HEPNER , CLYDE
4304 MACKEY RD
HOWE TX 75459-2452

HEPNER , DONNA
4304 MACKEY RD
HOWE TX 75459-2452

HERNANADEZ , MS ALYSSA
324 W DUKE ST
HOWE TX 75459-4566

HERTEL , AMY
APT 3613
5001 PAR DR
DENTON TX 76208-6739

HESS , KATERINA
3405 PORTSMOUTH PL
SHERMAN TX 75092-6261

HESTAND , JERRY DEAN
BOBCAT UNIVERSE
PO BOX 883
HOWE TX 75459-0883

HESTER , DEBBIE
1350 COUNTY ROAD 166
WHITESBORO TX 76273-3983

HICKERSON , BRANDON
124 LAUGHLIN RD
SHERMAN TX 75092-6952

HICKERSON , TARA
124 LAUGHLIN RD
SHERMAN TX 75092-6952

HICKS , DWAYNE
9949 FM 902
DORCHESTER TX 75459-2409

HIGNIGHT , MICHAEL S
600 MORMAN GROVE RD
SHERMAN TX 75092-7072

HILL , CAROL
1422 HANGING ROCK TRCE
GUNTER TX 75058-4270

HILL , TRAVIS
216 E BROCKETT ST
SHERMAN TX 75090-4930

HILL , MELINDA
41 WAGON WHEEL TRL
SHERMAN TX 75092-6982

HILL , MRS MELISSA
616 PREAKNESS PLACE RD
VAN ALSTYNE TX 75495-2612

HOFFMAN-SHEHAN , AMY
1503 S TRAVIS ST
SHERMAN TX 75090-8822

HOLLY , AMY
2400 W SMITH AVE
BOISE ID 83702-0328

HOOKS , SUZANNE
1501 WOLF RIDGE RUN
GUNTER TX 75058-4216

HORN , DON
PO BOX 509
GUNTER TX 75058-0509

HORNE , CHARITY
1227 SINGLETREE RD
DENISON TX 75021-7675

HORNER , ROBIN A
811 FM 2729
WHITEWRIGHT TX 75491-6147

HORNER , SCOTT
811 FM 2729
WHITEWRIGHT TX 75491-6147

HORTON , HELEN
5022 MESQUITE RIDGE TRL
SHERMAN TX 75092-8348

HOWARD , SHERRY
204 DALE ST
WHITEWRIGHT TX 75491-6121

HOWELL , GABE
723 CYPRESS POINT DR
GUNTER TX 75058-3246

HUFF , JOYCE A
1966 OLD SCOGGINS RD
DORCHESTER TX 75459-1785

HUFF , JEN
1920 OLD SCOGGINS RD
DORCHESTER TX 75459-1785

HUGHES , ALICE
6733 CALLEJO RD
GARLAND TX 75044-2803

HUGHES , MEGHAN
PO BOX 652
TOM BEAN TX 75489-0652

HUMMEL , MANDY
533 HICKORY RIDGE DR
VAN ALSTYNE TX 75495-3569

HUNT , JUSTIN
1756 HARRELL RD
HOWE TX 75459-3502

HUNT , DR. LAURA T
MIDLOTHIAN BREATHE
2941 AMERICAN SPARROW DR
MIDLOTHIAN TX 76065-1787

HUNTER , COLIN DREW
1273 WALL STREET RD
GUNTER TX 75058-2041

HUNTER , LINDA K
1273 WALL STREET RD
GUNTER TX 75058-2041

HUNTSMAN , LORI
954 WD HILL RD
SHERMAN TX 75092-7904

HURD , DEBBIE
2110 JONI CIR
SHERMAN TX 75092-3034

HUSBANDS , ASHLEY
2300 W TAYLOR ST
SHERMAN TX 75092-5064

HUST , BRODY
1009 HIGHWAY 377 N
WHITESBORO TX 76273-3005

INGRAM II , BILLIE CHARELS
CITY OF HOWE
PO BOX 518
HOWE TX 75459-0518

JACQUES , HEATHER
1600 BEARPATH WAY
GUNTER TX 75058-4209

JACQUES , MIKE
1600 BEARPATH WAY
GUNTER TX 75058-4209

JAMES , PHYLLIS D COMMISSIONER PRECINT 3
GRAYSON COUNTY
FLR 3
100 W HOUSTON ST
SHERMAN TX 75090-6019

JEFFERSON , MR MICHAEL
352 WD HILL RD
SHERMAN TX 75092-7953

JENKINS , RACHEL
PO BOX 29
COLLINSVILLE TX 76233-0029

JENNINGS , CHRIS
1517 TIMBERCREEK DR
HOWE TX 75459-2887

JENNINGS , TRISH
1320 MALLARD DR
SHERMAN TX 75092-4221

JENSEN , SUZANNA DRYDEN
DRYDEN DORCHESTER LLC
PO BOX 2189
ADDISON TX 75001-2189

JENSEN , SUZANNA DRYDEN
DRYDEN DORCHESTER LLC
5412 SPRINGMEADOW DR
DALLAS TX 75229-4333

JOHNSON , BRANDON
999 CYPRESS POINT DR
GUNTER TX 75058-3235

JOHNSON , LIBERTY
152 HARBOR RD
DENISON TX 75020-2646

JOHNSON , LINDA KAY
2442 STATE HIGHWAY 289
SHERMAN TX 75092-6511

JOHNSON , NATHAN K
1677 TATE CIR
SHERMAN TX 75090-3497

JONES , CARRIE
1535 PIONEER VLY
HOWE TX 75459-2826

JONES , ELIZABETH
HWY 289 MORMON GROVE RD
DORCHESTER TX 75459

JONES , ELIZABETH
PO BOX 331190
CORPUS CHRISTI TX 78463-1190

JONES , KATHY
PO BOX 26
TOM BEAN TX 75489-0026

JONES , LORI
SOCIETY OF PETROLEUM ENGINEERS INC
223 NEWPORT DR
VAN ALSTYNE TX 75495-2793

JONES , NICK
PO BOX 26
TOM BEAN TX 75489-0026

JONES , JAKE
PO BOX 681
TOM BEAN TX 75489-0681

JOSEPH , DR. RAY M
KERATEX LP
STE 100
7920 PRESTON RD
PLANO TX 75024-2343

JUDKINS , MRS DEBBIE ELAINE
PO BOX 1168
HOWE TX 75459-1168

KALBFLEISCH , MANDE
180 MELROSE CIR
DENISON TX 75020-2696

KALBFLEISCH , CARL
180 MELROSE CIR
DENISON TX 75020-2696

KALERI , CYNTHIA J
US EPA
STE 500
1201 ELM ST
DALLAS TX 75270-2102

KARAM , MARY
2117 PARK VLG
DENISON TX 75020-7107

KEMP , KENYON
PO BOX 678
COLLINSVILLE TX 76233-0678

KENEMORE , DINA
736 CHOCTAW EST CIR
SHERMAN TX 75092-7930

KENNEDY , BRITTANY
204 CHISOLM TRL
POTTSBORO TX 75076-3163

KIMBREL , JAMES
282 ROCKPORT RD
SHERMAN TX 75092-6966

KING , BRODY
1671 TAYLOR RD
HOWE TX 75459-2517

KING , CODY M
1671 TAYLOR RD
HOWE TX 75459-2517

KING , MRS GERI V
49 HEFLEY RD
DORCHESTER TX 75459-2436

KING , GERI & KEN
49 HEFLEY RD
DORCHESTER TX 75459-2436

KING , HAYDEN
1671 TAYLOR RD
HOWE TX 75459-2517

KING , KENNETH J
49 HEFLEY RD
DORCHESTER TX 75459-2436

KING , LAURA L
1671 TAYLOR RD
HOWE TX 75459-2517

KIRBY , BRENT
410 STARK LN
SHERMAN TX 75090-3405

KIRBY , PAM
410 STARK LN
SHERMAN TX 75090-3405

KIRILLOFF , LAURA
1615 COUNTY ROAD 1106
ANNA TX 75409-5868

KIRKPATRICK , DEBBIE
2217 CHIPPEWA HLS
GUNTER TX 75058-4221

KISSELLE , DR. KEITH
AUSTIN COLLEGE
STE 61610
1302 N CLEVELAND AVE
SHERMAN TX 75090-4154

KLAS , JIMMY F
1457 DAGNAN RD
HOWE TX 75459-1795

KLAS , DETRA
3201 SOUTHMAYD RD
WHITESBORO TX 76273-5567

KLAS , PEGGY
1457 DAGNAN RD
HOWE TX 75459-1795

KLINE , DAVID
207 PRESCOTT RD
HOWE TX 75459-2037

KLOK , VANETTA M
5220 PENTRIDGE DR
SHERMAN TX 75092-7085

KNAPP , ELIZABETH
220 MEADOW VIEW LN
ANNA TX 75409-5284

KORDOSKY , ANTHONY J
1281 W FARMINGTON RD
VAN ALSTYNE TX 75495-2274

KVAAL , CINDY & RICK
500 WD HILL RD
SHERMAN TX 75092-7964

KVAAL , RICK
500 WD HILL RD
SHERMAN TX 75092-7964

KVAAL , CINDY
500 WD HILL RD
SHERMAN TX 75092-7964

KYLE , IRMS
4827 HELEN DR
DENISON TX 75020-9459

LAIRD , GREG L
203 S FRENCH AVE
DENISON TX 75020-3520

LAMBERT , AMANDA
1748 LADD RD
SHERMAN TX 75090-5401

LAMBERT , AUSTIN
1748 LADD RD
SHERMAN TX 75090-5401

LAMBERT , LAUREN
PO BOX 138
COLLINSVILLE TX 76233-0138

LANCE , ROBERT
109 N JORDAN ST
WHITESBORO TX 76273-1519

LANDGRAF , BENJAMIN T
915 VAULTED OAK ST
HOUSTON TX 77008-1448

LANDINO , CHRIS
1732 WYATT RD
HOWE TX 75459-2096

LANDRUM , WILLIAM
304 PRIMROSE LN
SHERMAN TX 75092-6921

LANGFORD , MRS TERRI
645 RIDDELS RD
SHERMAN TX 75092-7935

LANICEK , JULIE
3615 BETHEL CANNON RD
VAN ALSTYNE TX 75495-3577

LANKFORD , JASON
11831 FM 902
DORCHESTER TX 75459-2421

LANKFORD , JASON R
52 WHITE MOUND RD
SHERMAN TX 75090-5662

LARKFORD , JASON
52 WHITE MOUND RD
SHERMAN TX 75090-5662

LARSON , ESTEE
1203 MALLARD DR
SHERMAN TX 75092-4220

LATONA , LOANN
831 STATE ROAD 70E
CALERA OK 74730-5531

LATONA , PATRICK
831 STATE ROAD 70E
CALERA OK 74730-5531

LAUERHAHS , VAL
149 MEADOWVIEW CIR
VAN ALSTYNE TX 75495-2291

LAWSON , BRENT
PO BOX 1903
VAN ALSTYNE TX 75495-1903

LAWSON , CRYSTAL L
538 STARK LN
SHERMAN TX 75090-3407

LAWSON , RHONDA
PO BOX 715
COLLINSVILLE TX 76233-0715

LEE , WAYNE
309 LOPEZ DR
SHERMAN TX 75090-3485

LEFTON , SEAN
APT 112
6688 JOHN HICKMAN PKWY
FRISCO TX 75034-9598

LEMASTER , PATSY
2101 FOX BEND TRCE
GUNTER TX 75058-4204

LEWELLEN , JAMES
1558 WATSON RD
WHITESBORO TX 76273-5544

LI , JAMES & TINA
2200 NW GREEN OAKS BLVD
ARLINGTON TX 76012-5100

LIGHT JR , GEORGE
20462 FM 902
COLLINSVILLE TX 76233-3700

LIKARISH , KYLEE
5621 RIDGEPASS LN
MCKINNEY TX 75071-6221

LILLY , ELIZABETH
490 INDEPENDENCE SPGS
SHERMAN TX 75090-3346

LISSIAK III , MR VICTOR
2164 FORD ROAD
SHERMAN TX 75092

LITTLE , MRS MARY
5320 W MEADOWRIDGE RD
SHERMAN TX 75092-4758

LOPEZ , MR CHRISTOPHER A
250 TEE TAW CIR
SHERMAN TX 75092-6999

LOPEZ , PAUL DANIEL
2001 FOREST MEADOW DR
PRINCETON TX 75407-2655

LUCAS , JIM & TRUDY
7322 HIGHWAY 289
DORCHESTER TX 75459-2118

LUCAS , JIM
7322 STATE HIGHWAY 289
HOWE TX 75459-2118

LUCAS , KRISTA
7322 STATE HIGHWAY 289
HOWE TX 75459-2118

LUCAS , TRUDY & TRUDY
LUCAS RANCH
7322 STATE HIGHWAY 289
HOWE TX 75459-2118

LUCAS , TRUDY & TRUDY
LUCAS RANCH
7322 STATE HIGHWAY 289
HOWE TX 75459-2118

LUNDE , THERESA
15834 STATE HIGHWAY 56
SHERMAN TX 75092-7942

LUNDE , MR ERIC
15834 STATE HIGHWAY 56
SHERMAN TX 75092-7942

LUTHER , SHELLEY
587 WHITE MOUND RD
SHERMAN TX 75090-5633

LYNCH , RONALD CLAY
255 CHOCTAW EST CIR
SHERMAN TX 75092-7925

MABERRY , LISA
17234 FM 678
WHITESBORO TX 76273-6119

MAHAN , DAKOTAH
PO BOX 726
TOM BEAN TX 75489-0726

MAI , MR BRIAN
FURIZON LIMITED
PO BOX 3328
SHERMAN TX 75091-3328

MALLORY , SARAH
1323 COUNTY ROAD 176
WHITESBORO TX 76273-5639

MALTA II , MR RICKEY JAY
APT 146
116 N WESTERN HILLS DR
HOWE TX 75459-2875

MANDI , MRS CASEY
1434 SCHNEIDER RD
HOWE TX 75459-3560

MARR , JOSH
108 PROVIDENCE DR
VAN ALSTYNE TX 75495-2799

MARR , ROSE M
2031 MEADOWLAKE DR
SHERMAN TX 75092-8397

MARSH , MICHAEL GENE
109 TEE TAW CIR
SHERMAN TX 75092-6997

MARSHALL , RONALD W
706 W LAMBERTH RD
SHERMAN TX 75092-2924

MARTIN , MICKIE
MARTIN'S HEATING AC & DUCT CLEANING
543 HOG SKIN RD
SHERMAN TX 75090-3714

MARTIN , MONICA
3000 PRESTON CLUB DR
SHERMAN TX 75092-8369

MARTIN , BRITTANY
101 KENNEDY RD
SHERMAN TX 75092-6949

MARUM , STEVE
2619 RIVERCREST DR
SHERMAN TX 75092-2219

MASON , GEORGE EDWARD
2117 PARK VLG
DENISON TX 75020-7107

MATUELLA , CATHERINE
615 NOLAN DR
SHERMAN TX 75092-7210

MAULDIN , MRS PATSY
310 TEE TAW CIR
SHERMAN TX 75092-7900

MAXWELL , BRUCE
100 THOMPSON DR
VAN ALSTYNE TX 75495-2788

MAYER , MR DUSTY WAYNE
776 W JEFFERSON ST
VAN ALSTYNE TX 75495-3424

MAYER , WILLIAM
1516 SAN CARLOS DR
VAN ALSTYNE TX 75495-2687

MCCARTHY , MRS TRACI
3320 CARRIAGE CIR
SHERMAN TX 75092-4402

MCCLURE , CLAUDIA L
2659 COUNTY ROAD 1106
ANNA TX 75409-5839

MCCLURE , MRS KATHLEEN
180 CYPRESS POINT DR
GUNTER TX 75058-3256

MCCONNELL , LES
5202 WILDER TRL
SHERMAN TX 75092-6411

MCCOWN , GARRETT
1716 N TRAVIS ST
SHERMAN TX 75092-3764

MCCOWN , GARRETT
161 KENNEDY RD
SHERMAN TX 75092-6949

MCCOWN , MRS JANNA C
2866 BENNETT RD
HOWE TX 75459-3432

MCCOY , VIVIAN ROBIN
ROBIN MCCOY
746 OLD HIGHWAY 6
HOWE TX 75459-4633

MCDONALD , KARLA MAYOR
CITY OF HOWE
513 CASSANDRA ST
HOWE TX 75459-3689

MCDONALD , LARRY
513 CASSANDRA ST
HOWE TX 75459-3689

MCEWEN , TOYA
439 PRESTON MEADOWS RD
SHERMAN TX 75092-6954

MCKELVA , MR ALAN LEE
111 FALLS CREEK LN
GUNTER TX 75058-2559

MCMAHAN , DIANA
10455 COUNTY ROAD 497
PRINCETON TX 75407-2363

MCNUTT , LAUREN
1314 BATEMAN LN
CELINA TX 75009-3819

MCNUTT , PATRICK NEAL
1314 BATEMAN LN
CELINA TX 75009-3819

MEALY , LAURIE
1109 N LESLIE AVE
SHERMAN TX 75092-5132

MEISSNER , KEVIN
1364 HACKBERRY RD
VAN ALSTYNE TX 75495-2309

MELTON , DAVOLYN
1905 CHALK RD
ANNA TX 75409-5462

MELTON , DUSTY
1037 SMITH RD
HOWE TX 75459-2851

MERVICKER , ALICE
4440 DAGNAN RD
HOWE TX 75459-1714

MEYER , AMY
TOM W ALLEN III AND AMY ALLEN MEYER AND AMY ALLEN MEYER AN
6501 KNOLLWOOD DR
MCKINNEY TX 75072-2362

MILLER , STEVE
808 WIBLE RD
SHERMAN TX 75092-6525

MILLER , CAITLYN
1601 N RICKETTS ST
SHERMAN TX 75092-3621

MILLER , JOSH
8388 OTTOWA RDG
FRISCO TX 75034-1572

MIORIN , MRS DAVIDA
116 WHISPERING WINDS DR
GUNTER TX 75058-2556

MITCHELL , CINDY
895 OLD AIRPORT RD
DENISON TX 75021-5800

MITCHELL , MARK
895 OLD AIRPORT RD
DENISON TX 75021-5800

MITCHUSSON , MICHAEL J
20336 STATE HIGHWAY 56
WHITESBORO TX 76273-7960

MITCHUSSON , LYNN M
TRIPLE M FARMS
1716 ROBIN DR
SHERMAN TX 75092-5533

MOAYEDI , MEHRDAD
MM COTTONWOOD 640 LLC
STE 300
1800 VALLEY VIEW LN
FARMERS BRANCH TX 75234-8922

MONK , ALAN & TERESA
999 WYATT RD
HOWE TX 75459-2122

MOORE HALL , DAMON L
2311 NORWOOD RD
SHERMAN TX 75092-4430

MOORE , JOYCE L
1302 LOUROCK ST
GARLAND TX 75040-4548

MOORE , GROVER FRANKLIN
1302 LOUROCK ST
GARLAND TX 75040-4548

MOORE , MRS MAKAYLA
208 KING AVE
HOWE TX 75459-4558

MOREAU , ANGELA
306 ROBERTS ST
HOWE TX 75459-4508

MORGAN , MARY
2884 KNOB HILL RD
VAN ALSTYNE TX 75495-5195

MORIN , JASON
100 BURGHLEY CT
BARTONVILLE TX 76226-6958

MORRIS , MRS SHANDI
1088 PRESTON MEADOWS RD
SHERMAN TX 75092-6930

MORRIS , AMARISE
1088 PRESTON MEADOWS RD
SHERMAN TX 75092-6930

MORRIS , ANDRONICA
1088 PRESTON MEADOWS RD
SHERMAN TX 75092-6930

MORRIS , MATTHEW
2404 PIONEER POND RD
MCKINNEY TX 75071-2380

MORRIS , ZADRIAN
1088 PRESTON MEADOWS RD
SHERMAN TX 75092-6930

MORRISON , TERRY
481 GEORGE RD
HOWE TX 75459-3538

MORROW , ASHLEY
107 FABER RD
DORCHESTER TX 75459-2007

MORROW , MARTHANN
PO BOX 441
POTTSBORO TX 75076-0441

MUELLER , SIERRA
1517 ASBURY DR
VAN ALSTYNE TX 75495-2698

MUNIZ , MATTHEW
1212 S GRIBBLE ST
SHERMAN TX 75090-8214

MUNSON , CINDY R
818 W WASHINGTON ST
SHERMAN TX 75092-5725

MURPHY , KAREN
1321 VINEYARD RD
GUNTER TX 75058-3111

MUSANI , AMIN & SHIRLEY
2400 TURTLE CREEK DR
SHERMAN TX 75092-3028

MUSANI , SHIRLEY
2400 TURTLE CREEK DR
SHERMAN TX 75092-3028

MUSANI , AMIN
2400 TURTLE CREEK DR
SHERMAN TX 75092-3028

MYER , LUCY
APT 8306
870 BLASSINGAME AVE
VAN ALSTYNE TX 75495-2844

MYER , LYNDA
148 LAUGHLIN RD
SHERMAN TX 75092-6952

MYER , RICK
33 HARMON CIR
HOWE TX 75459-2430

MYER , RICK
89 HARMON CIR
HOWE TX 75459-2430

MYGRANT , STEVEN
2520 W HOUSTON ST
SHERMAN TX 75092-7636

MYRICK , SARAH
1820 CLEGG ST
HOWE TX 75459-2915

NADELLA , RAMESH
1125 BRIDGEWAY LN
ALLEN TX 75013-5624

NAIL , RHONDA
112 HIGHLAND TERRACE CIR
DENISON TX 75020-2676

NARAMOR , JASON LEE
1620 N HOARD AVE
SHERMAN TX 75090-4019

NATHWANI , MITAJ
COTHRAN MALIBU LP
19422 SIERRA LINDA RD
IRVINE CA 92603-3938

NATIONS, COURTNEY & ROBERTSON,KELLEN
1620 YARBOROUGH DR
SHERMAN TX 75092-5545

NEAL , SHANON
406 BRYN MAWR LN
VAN ALSTYNE TX 75495-7083

NEELY , KEN
391 MIDWAY ACRES DR
HOWE TX 75459-2487

NEELY , PAULA
391 MIDWAY ACRES DR
HOWE TX 75459-2487

NELSON , MRS SHARON
886 LYNCH CROSSING BLVD
WHITESBORO TX 76273-7106

NELSON , JACOB
259 TEE TAW CIR
SHERMAN TX 75092-7923

NICHOLS , MS ANDEELEA ANDERSON
294 MAIN ST
DORCHESTER TX 75459-2472

NICHOLS , DANNY THOMAS
294 MAIN ST
DORCHESTER TX 75459-2472

NICOLOFF , CHRIS
3774 RANGE CREEK RD
HOWE TX 75459-2050

NIXON , MARIE
361 BLUEBONNET LN
SHERMAN TX 75092-7919

NIXON , PAUL
361 BLUEBONNET LN
SHERMAN TX 75092-7919

NIXON , ROSE MARIE
361 BLUEBONNET LN
SHERMAN TX 75092-7919

NOEL , MARGIE
293 NOEL RD
HOWE TX 75459-2495

NORMAN , DAVID
4871 MACKEY RD
HOWE TX 75459-2459

NORMAN , MARYE JEAN
NORMAN FARMS
4563 MACKEY RD
HOWE TX 75459-2455

NORRIS , BRANDON
47 TEE TAW CIR
SHERMAN TX 75092-9511

NORRIS , BRIAN E
47 TEE TAW CIR
SHERMAN TX 75092-9511

NORRIS , MARGARET
11451 FM 902
DORCHESTER TX 75459-2415

NORRIS , TERA
47 TEE TAW CIR
SHERMAN TX 75092-9511

NORRIS , JENNIFER
646 DENTON DR
SHERMAN TX 75092-5625

NORTHRUP , ERICA
116 PREAKNESS PLACE RD
VAN ALSTYNE TX 75495-2606

NORTON , MR DUNCAN C
LLOYD GOSSELINK ROCHELLE & TOWNSEND PC
STE 1900
816 CONGRESS AVE
AUSTIN TX 78701-2442

OLMSTEAD , ANDREW WALLACE
ANDREW OLMSTEAD
PO BOX 1298
SHERMAN TX 75091-1298

OMDAHL , BRENT
949 BILLUPS DR
VAN ALSTYNE TX 75495-2875

OMDAHL , BRENT
GLOBALWAFERS AMERICA
3200 NORTHGATE DR
SHERMAN TX 75092

OMDAHL , MR BRENT E
GLOBALWAFERS AMERICA AND GLOBITECH, INC.
2209 N SPLIT ROCK PL
200 FM 1417
SHERMAN TX 75092

ONLEY , ANGELA
204 PROVIDENCE DR
VAN ALSTYNE TX 75495-2861

ORTLEY , MELINDA
3183 HARRELL RD
HOWE TX 75459-3519

OVERBEY SR. , BOBBY
57 GREEN RD
SHERMAN TX 75092-7945

OVERBEY SR , BOBBY N
11831 FM 902
DORCHESTER TX 75459-2421

OVERBEY SR , BOBBY N
57 GREEN RD
SHERMAN TX 75092-7945

OVERBEY , BONITA L
57 GREEN RD
SHERMAN TX 75092-7945

OVERBEY , LESIA
223 GREEN RD
SHERMAN TX 75092-7955

OVERBEY , TIM
11831 FM 902
DORCHESTER TX 75459-2421

OVERBEY , TIM
223 GREEN RD
SHERMAN TX 75092-7955

OVERSTREET , DEAUN
995 SPERRY RD
HOWE TX 75459-2100

OVERSTREET , JEFF
995 SPERRY RD
HOWE TX 75459-2100

OVERSTREET , SHELBY & TYLER
373 MAIN ST
DORCHESTER TX 75459-2475

OVERSTREET , JEFFREY TYLER
2391 E STATE HIGHWAY 121
LEWISVILLE TX 75056-5004

OVERSTREET , MRS PAULA
995 SPERRY RD
HOWE TX 75459-2100

OVERSTREET , TYLER
2391 E STATE HIGHWAY 121
LEWISVILLE TX 75056-5004

OWEN , NIKOLAUS
1901 W SHEPHERD DR
SHERMAN TX 75092-7047

PABEN , MRS MARTHA
1821 BLEDSOE RD
GUNTER TX 75058-3216

PAGE , AUBREY & KAREN
5207 W MEADOWRIDGE RD
SHERMAN TX 75092-4757

PARKS , BRIAN
1420 W SHEPHERD DR
SHERMAN TX 75092-7036

PARRISH , ANGIE
180 TEE TAW CIR
SHERMAN TX 75092-6998

PARRISH , JAMES
180 TEE TAW CIR
SHERMAN TX 75092-6998

PATRICK , THE HONORABLE DAN LIEUTENANT GOVERNOR
STATE OF TEXAS
PO BOX 12068
AUSTIN TX 78711-2068

PATTERSON , TRENT
821 SHALLOW CREEK WAY
MCKINNEY TX 75071-1774

PATTON , ANGELA
610 VERNA LN
DENISON TX 75020-4132

PATZER , MELISA
123 HENDERSON DR
WHITESBORO TX 76273-4358

PAULA , MRS HOLLAND
101 BLUEBONNET LN
SHERMAN TX 75092-6918

PAYNE , DEBRA
329 E SHERMAN ST
DENISON TX 75021

PENA , JOSE FERNANDO
411 W TAYLOR ST
SHERMAN TX 75092-2749

PERRIN , SHERRY
1121 OLD GUNTER HWY
SHERMAN TX 75092-7950

PERRY , TREBOR
194 RIDGEVIEW DR
SHERMAN TX 75090-5125

PETERSON , JAMES
2026 FLORA LN
DENISON TX 75020-3600

PETZ , MR & MRS MATTHEW
59 BLUEBONNET LN
SHERMAN TX 75092-7041

PIASCHYK , PAT
1208 SHARP RD
GUNTER TX 75058-4168

PINTO , JAVI
5315 HIDDEN TRAILS DR
ARLINGTON TX 76017-2171

PLYLER , DAVID MAYOR
CITY OF SHERMAN
220 W MULBERRY ST
SHERMAN TX 75090-5832

POLING , ZACH
FIRST BAPTIST CHURCH DORCHESTER
11831 FM 902
DORCHESTER TX 75459-2421

POLING , ZACH
11817 FM 902
DORCHESTER TX 75459-2421

PORTSCHE , HEATHER
FIRST CLASS NORTH TEXAS
11831 FM 902
DORCHESTER TX 75459-2421

POWELL , SUSAN
211 WILLIAMSBURG DR
VAN ALSTYNE TX 75495-2791

POWELL , EMILY
775 PITCHFORK RD
HOWE TX 75459-4627

POWELL , MRS TAYLOR P
1511 SAN CARLOS DR
VAN ALSTYNE TX 75495-2688

PREWITT , SHELLY
1525 WATSON RD
WHITESBORO TX 76273-5542

PRICE , JOSH & LINDSAY
117 LAUGHLIN RD
SHERMAN TX 75092

PRICE , JOSHUA D
117 LAUGHLIN RD
SHERMAN TX 75092-6943

PRICE , LINDSAY
117 LAUGHLIN RD
SHERMAN TX 75092-6943

PRICE , RICKY
302 W DUKE ST
HOWE TX 75459-4566

PRISOCK , DELFINA
656 PRESTON MEADOWS RD
SHERMAN TX 75092-6937

PUCKETT , KATHY
1223 PITCHFORK RD
HOWE TX 75459-4492

PULCHEON , CHELSEY
500 BLOOMFIELD RD
VALLEY VIEW TX 76272-7814

PURDOM , MR RAY H
PO BOX 2931
SHERMAN TX 75091-2931

PURDOM JR , MR RAY H
RETIRED FROM TEXAS INSTRUMENTS
PO BOX 2931
SHERMAN TX 75091-2931

PURDOM JR , MR RAY H
PO BOX 2931
SHERMAN TX 75091-2931

RABE , CRAIG
330 RIVER PARK RD
CELINA TX 75009-4316

RAINBOW , TERRY
1301 PRESTON DR
SHERMAN TX 75092-5136

RAMSAY , LAINIE
141 CHISOLM TRL
POTTSBORO TX 75076-3165

RANER , JUSTIN & KATHY
6815 MACKEY RD
DORCHESTER TX 75459-2404

REDD , ALAN
3570 COUNTY ROAD 122
GAINESVILLE TX 76240-1158

REEVES , PATSY A
40 PAYNE DR
SHERMAN TX 75092-6987

REEVES , LAURA
PO BOX 451
ANNA TX 75409-0451

REEVES , RICHARD
40 PAYNE DR
SHERMAN TX 75092-6987

RENFRO , J
1804 BELLE CIR
DENISON TX 75020-9700

RENFRO , SCOTT
PO BOX 34
HOWE TX 75459-0034

RENTERIA , RICHARD
4708 PINNACLE PL
DENISON TX 75021-3177

REYES , CYNTHIA
161 KENNEDY RD
SHERMAN TX 75092-6949

RICE , TARA
478 HIGH COUNTRY RD
SHERMAN TX 75092-6853

RICHARDSON , RENATA
45 HANNA COVE DR
DENISON TX 75020-4795

RILEY , CHARITY
1144 SCHNEIDER RD
HOWE TX 75459-3558

RISK , CINDY & NAIF J
445 RIDDELS RD
SHERMAN TX 75092-7936

RITCHEY , SARAH
708 MARY LEE LN
COLLINSVILLE TX 76233-1402

ROBERTS , MRS JOY
3164 HARRELL RD
HOWE TX 75459-3518

ROBERTS , MARY
2532 SHERWOOD DR
SHERMAN TX 75092-2243

ROBINSON , KYLYNN
1309 COUNTY ROAD 109
WHITESBORO TX 76273-4715

ROBISON , DOUGLAS RAY
303 PRIMROSE LN
SHERMAN TX 75092-6922

ROBISON , JUDY CAROL
303 PRIMROSE LN
SHERMAN TX 75092-6922

ROBISON , LUANNE
271 PRIMROSE LN
SHERMAN TX 75092-6920

ROBISON , MARK DOUGLAS
KNX UTILITY SERVICES LLC
271 PRIMROSE LN
SHERMAN TX 75092-6920

ROBNETT , BRAD
NO 757
466 MACKEY RD
GUNTER TX 75058-2516

ROBNETT , MRS MONA
NO 757
466 MACKEY RD
GUNTER TX 75058-2516

ROCAMONTES , ELIZABETH
117 SHADY WOODS LN
DENISON TX 75021-4255

RODARMIER , PAUL
PO BOX 670
TIOGA TX 76271-0670

RODRIGUEZ , ELIZABETH
115 E OAK ST
GUNTER TX 75058-2531

ROLLINS , JENNIFER
7811 FM 902
SHERMAN TX 75092-7096

RONDUEN , MEL
14130 SHILOH SPRINGS DR
FRISCO TX 75035-5569

ROSS , BILL & EVELYN
153 WILLIAMS TRL
HOWE TX 75459-3569

ROSS , ERICA
3600 VISION RIDGE TRL
DENISON TX 75020-0056

ROSS , SHARLA
156 NEWMAN RD
SHERMAN TX 75090-3436

ROWE , KERRI
7725 AUBREY LN
NORTH RICHLAND HILLS TX 76182-9235

ROYSTON , KARA
1532 TIMBERCREEK DR
HOWE TX 75459-2886

RUCKER , BRAD
660 JUDD RD
VAN ALSTYNE TX 75495-5185

RUSHING , KAYLI
313 PRESTON MEADOWS RD
SHERMAN TX 75092-6955

RUSSELL , BETTYE
219 W WILSON AVE
SHERMAN TX 75090-9007

RUSSELL , BRIAN
7308 GREENHAVEN DR
AUSTIN TX 78757-2151

RUSSELL , WILLIAM F
9016 MAGUIRES BRIDGE DR
DALLAS TX 75231-4017

RUTHERFORD , RUSSELL
708 S CHEROKEE DR
TIOGA TX 76271-2532

RUTHERFORD , VALARIE
708 S CHEROKEE DR
TIOGA TX 76271-2532

RUTHERFORD , RUSSELL
95 CRESTVIEW LN
DORCHESTER TX 75459-2003

RYAN , SHANNON
4909 BELLO VISTA CT
SHERMAN TX 75090-4706

RYKENS , CHRISTINA R
2907 INDEPENDENCE DR
MELISSA TX 75454-2459

SAINDON , CARRIE
104 MALLARD CT
GUNTER TX 75058-3270

SALINAS , SARA
HOWE MIDDLE SCHOOL
300 BEATRICE ST
HOWE TX 75459-4554

SANCHEZ , ROBERT
511 W COLLINS ST
DENISON TX 75020-7655

SATHAPPUN , ANOO
VIVID PARTNERS LLC
244 W MCFARLAND ST
BELLS TX 75414-3517

SCHERMBECK , MR JIM EDWARD
DOWNWINDERS AT RISK EDUCATION FUND
STE 202
1808 S GOOD LATIMER EXPY
DALLAS TX 75226-2202

SCHMITT , JAROD
405 S COLORADO ST
CELINA TX 75009-6445

SCHMOKER , DOROTHY
2516 ROLLING HILLS DR
SHERMAN TX 75092-4784

SCHMOKER , JOHN
2516 ROLLING HILLS DR
SHERMAN TX 75092-4784

SCHNITKER , BOB
179 WEBER DR
HOWE TX 75459-2093

SCHNITKER , GARY
50 WEBER DR
HOWE TX 75459-2125

SCHNITKER , JOANN
179 WEBER DR
HOWE TX 75459-2093

SCHNITKER , BRADLEY J
1483 TAYLOR RD
HOWE TX 75459-2511

SCHNITKER , MARCI
1483 TAYLOR RD
HOWE TX 75459-2511

SCHULZE , DR. PETER C
416 RIDGEVIEW RD
SHERMAN TX 75092-7737

SCOTT , MS MARY J
448 MORMAN GROVE RD
SHERMAN TX 75092-6911

SCOTT , MARY JEANNETTE
307 W YOUNG ST
HOWE TX 75459-4664

SCOTT , BETTY
703 SPERRY RD
HOWE TX 75459-2059

SEAL , DEREK
MCGINNIS LOCHRIDGE
1111 W 6TH ST APT 400
AUSTIN TX 78703-5345

SEARS , ROBIN
200 CAYUGA TRL
LAKE KIOWA TX 76240-9544

SEDMACK , MRS RACHEAL
PO BOX 1472
HOWE TX 75459-1472

SHACKLEE , MRS DOREEN
875 CHAPPERAL RD
WHITESBORO TX 76273-7126

SHARP , KENT
STE 102
307 W WASHINGTON ST
SHERMAN TX 75090-5883

SHAW , NANCY JAN
1603 HACKBERRY RD
VAN ALSTYNE TX 75495-3398

SHAW , TRUE
APT B
608 E ROSEDALE ST
SHERMAN TX 75090-8058

SHELTON , ROSA
12944 FM 902
HOWE TX 75459-2012

SHEPARD , DAVID
206 CENTER ST
WHITESBORO TX 76273-1704

SHIELDS , GARY
PO BOX 158
HOWE TX 75459-0158

SHILLING , JOHN
101 WILLOW RIDGE CIR
SHERMAN TX 75092-6385

SHILLING , KRISTI
101 WILLOW RIDGE CIR
SHERMAN TX 75092-6385

SHOEMAKER , LARRY
266 BOBBY SAM CT
COLLINSVILLE TX 76233-3591

SILEVEN , DAVID G
164 OWEN LN
VAN ALSTYNE TX 75495-4323

SILEVEN , SHIRLEY
164 OWEN LN
VAN ALSTYNE TX 75495-4323

SIMS , LINDA
428 PRESTON GLN
GUNTER TX 75058-9511

SIMS , DAVID
136 CHRISSA DR
POTTSBORO TX 75076-7061

SINCLAIR , KENDA
APT 22
500 4TH ST
WHITESBORO TX 76273-1000

SKINNER , DONNA FARRER
1802 W CEDAR ST
DURANT OK 74701-3638

SLAUGHTER , SHARON
PO BOX 3204
SHERMAN TX 75091-3204

SMIHT , DAVID
QUALITY GRAIN LLC
11652 FM 902
DORCHESTER TX 75459-2416

SMITH , DARLENE L
TC
805 PAXTON RD
GUNTER TX 75058-3125

SMITH , DAVID MAYOR
CITY OF DORCHESTER
11652 FM 902
DORCHESTER TX 75459-2416

SMITH , DAVID MAYOR
CITY OF DORCHESTER
PO BOX 151
HOWE TX 75459-0151

SMITH , DAVID
CITY OF DORCHESTER
373 MAIN ST
DORCHESTER TX 75459-2475

SMITH , THE HONORABLE REGGIE STATE REPRESENTATIVE
TEXAS HOUSE OF REPRESENTATIVES DISTRICT 62
PO BOX 2910
AUSTIN TX 78768-2910

SMITH , THE HONORABLE REGGIE STATE REPRESENTATIVE
TEXAS HOUSE OF REPRESENTATIVES DISTRICT 62
STE 3
300 N TRAVIS ST
SHERMAN TX 75090-5925

SMITH , WENDY
PO BOX 151
HOWE TX 75459-0151

SMITH , ANGELA
2495 COUNTY ROAD 114
WHITESBORO TX 76273-6961

SMITH , DAVID
1712 SLATE CT
VAN ALSTYNE TX 75495-3588

SMITH , DAVID
PO BOX 151
HOWE TX 75459-0151

SMITH , DEREK
D&S LASER DESIGNS LLC
13011 FM 902
DORCHESTER TX 75459-2015

SMITH , DUSTIN
6588 OAK HILL LN
CELINA TX 75009-3992

SMITH , KYLE
105 LORAINE ST
POTTSBORO TX 75076-3603

SMITH , LEANN
6588 OAK HILL LN
CELINA TX 75009-3992

SMITH , WENDY
1000884534
PO BOX 151
DORCHESTER TX 75459-0151

SPEED , MR MICHAEL WAYNE
700 W BROCKETT ST
SHERMAN TX 75092-5763

SPENCER , MR JEFF RANDALL
CLAY PRECISION
1102 FM 1417 NE
SHERMAN TX 75090-2704

SPENCER , CYNTHIA ANNK
101 LAKE RD
SPRINGDALE AR 72764-2539

SPENCER , JULIA
2107 JONI CIR
SHERMAN TX 75092-3034

SPRABARY , FRANCES
94 MIDWAY ACRES DR
HOWE TX 75459-2481

SPRINGER JR , THE HONORABLE DREW STATE SENATOR
THE SENATE OF TEXAS DISTRICT 30
PO BOX 12068
AUSTIN TX 78711-2068

SPRINGER JR , THE HONORABLE DREW STATE SENATOR
THE SENATE OF TEXAS DISTRICT 30
406 E CALIFORNIA ST
GAINESVILLE TX 76240-4102

SPRINGFIELD , MICHAEL
132 JARON DR
POTTSBORO TX 75076-7051

SPRINKLE , MRS SARA
405 VILLANOVA DR
VAN ALSTYNE TX 75495-2696

STACHMUS , KRISTY
5003 CAMP VERDE CIR
SHERMAN TX 75092-4133

STAHL , PENNY
2506 FORD RD
DORCHESTER TX 75459-2426

STANDERFER , ROXANNE
1975 MACKEY RD
HOWE TX 75459-2447

STENGEL , DENNIS
2986 N STATE HIGHWAY 289
SHERMAN TX 75092-6556

STEWART , ALICE & JAMES
269 MAIN ST
DORCHESTER TX 75459-2473

STEWART , MRS ALICE FAYE
269 MAIN ST
DORCHESTER TX 75459-2473

STEWART , JAMES
269 MAIN ST
DORCHESTER TX 75459-2473

STEWART , ROBERT & SHIRLEY
1171 ROCKPORT RD
SHERMAN TX 75092-6907

STEWART , ROBERT
1171 ROCKPORT RD
SHERMAN TX 75092-6907

STEWART , LEAH
1026 PATRICIA DR
SHERMAN TX 75090-8342

STEWART , PATRICIA ANN
1214 BOERNE DR
CEDAR PARK TX 78613-5945

STONEBARGER , SHANA
2031 FM 406
DENISON TX 75020-2615

STRAWN RUSSELL , MRS LINDA SUE
9016 MAGUIRES BRIDGE DR
DALLAS TX 75231-4017

STRAWN , STEPHANIE
6334 OB GRONER RD
SHERMAN TX 75092-7966

STRAWN , TAYLOR
2232 FM 697
SHERMAN TX 75090-3727

STRAWN , CHANDLER
1732 WYATT RD
DORCHESTER TX 75459-2096

STRAWN , CHANDLER RYAN
6334 OB GRONER RD
SHERMAN TX 75092-7966

STRICKLAND , TONY
13768 BIG INDIAN RD
CALLISBURG TX 76240-7265

STRINGFIELD , JAMES MICHAEL
132 JARON DR
POTTSBORO TX 75076-7051

STRONG , DANA
PO BOX 829
GUNTER TX 75058-0829

STUEVE , CRYSTAL
1205 REDBUD ST
HOWE TX 75459-3579

SUBBIAH , SATHAPPUN
VIVID PARTNERS LLC
5573 FM 1461
MCKINNEY TX 75071-3044

SUBBIAH , SATHAPPUN
VIVID PARTNERS LLC
244 W MCFARLAND ST
BELLS TX 75414-3517

SUMRALL , AUSTIN
405 S PECAN ST
BELLS TX 75414-3003

SUTHERLAND , JAMES
161 BLUEBONNET LN
SHERMAN TX 75092-6918

SUTHERLAND , MARY
161 BLUEBONNET LN
SHERMAN TX 75092-6918

SVEHLAK , KENNETH & SUE
309 CENTRAL HIGH RD
ENNIS TX 75119-0899

SWINDLE , MEGHAN
1294 COX LN
WICHITA FALLS TX 76305-7216

TALBOTT , KEVIN
172 BLUEBONNET LN
SHERMAN TX 75092-6926

TALBOTT , TRACEY
172 BLUEBONNET LN
SHERMAN TX 75092-6926

TAMMY , GRIFFIN
451 FARMINGTON RD
SHERMAN TX 75092-7006

TAYLOR , BETTY JEAN
177 TAYLOR RD
DORCHESTER TX 75459-2501

TAYLOR , JAMES
149 TAYLOR RD
HOWE TX 75459-2501

TAYLOR , JASON A
91 MEADOW LAKE DR
POTTSBORO TX 75076-3943

TAYLOR , MARGARET
TRLR 407
1800 PRESTON ON THE LAKE BLVD
LITTLE ELM TX 75068-5643

TAYLOR III , MR THOMAS LELAND
11451 FM 902
DORCHESTER TX 75459-2415

TAYLOR III , MR THOMAS L
TAYLOR FARM AT DORCHESTER
HOUSE
21945 FM 901
GORDONVILLE TX 76245-4600

TAYLOR-BAKER , LARI ALEXIS
2210 HIGHLAND PARK DR
DENISON TX 75020-7319

TEAMANN , SHAWN C
3000 OVERLAND TRL
SHERMAN TX 75092-4522

TENANT , CRISTI
565 STEWART RD
SHERMAN TX 75092-6504

TEUBER , LT COL KAAREN J
PO BOX 696
VAN ALSTYNE TX 75495-0696

THOMAS , CARY
208 NEWPORT DR
VAN ALSTYNE TX 75495-2792

THOMAS , CHRIS
2530 FLORA LN
DENISON TX 75020-3616

THOMAS , ALYSSA
477 LOPEZ DR
SHERMAN TX 75090-3482

THOMASON , SALLY & TONY
118 HILLTOP LN
POTTSBORO TX 75076-4852

THORNHILL , MRS DANA
204 TATE CIR
SHERMAN TX 75090-3562

THURMAN , JOYCE
224 MIDWAY ACRES DR
HOWE TX 75459-2484

TIBBETS , LISA
PO BOX 624
HOWE TX 75459-0624

TOWERS , BOB
605 W BELDEN ST
SHERMAN TX 75092-3603

TRAVIS , JULIE
1740 WARD NEAL RD
BELLS TX 75414-3304

TREVINO , YOLANDA
130 BLUEBONNET LN
SHERMAN TX 75092-6926

TROXTELL , TONYA
TCF SHOW CATTLE
842 SMITH RD
HOWE TX 75459-2846

UHRIG , JOHN L
1011 W SHEPPARD DR
SHERMAN TX 75092-7044

UNDERWOOD , GRIFFIN
PO BOX 622
HOWE TX 75459-0622

UNDERWOOD , GRIFFIN
2031 FORD RD
HOWE TX 75459-2425

UTLEY , KRISTI
1716 MACKEY RD
HOWE TX 75459-2444

UTTER , GAIL W
2610 SHENANDOAH CIR
SHERMAN TX 75092-7650

VANBUSKIRK , DIANA TAYLOR R
HOME HOSPICE GRAYSON COUNTY
1106 N GRANT DR
SHERMAN TX 75092-5330

VANBUSKIRK , DR. RONALD
1106 N GRANT DR
SHERMAN TX 75092-5330

VANHERPEN , MICKINZE
2518 W WALKER ST
DENISON TX 75020-1436

VANNOY , CYNTHIA
2853 CATHEY DR
DENISON TX 75020-4537

VAWTER , DENISE
916 RICKETTS ST
HOWE TX 75459-4529

VERHOEK , BRITTANY
6000 ELDORADO PKWY
FRISCO TX 75033-3573

VESSELS , BILL
PO BOX 28
SHERMAN TX 75091-0028

VEST , MRS MARILYN SUE
2514 STATE HIGHWAY 289
SHERMAN TX 75092-6510

VINCEK , DESTINY
3823 FAWN MEADOW TRL
DENISON TX 75020-0061

VINCENT , BECKY
1495 TAYLOR RD
HOWE TX 75459-2511

VINCENT , BEN & NANCY
625 VERNA LN
DENISON TX 75020-4131

VINCENT , BILLY
256 CHOCTAW EST CIR
SHERMAN TX 75092-6972

VINCENT , JIMMY
11831 FM 902
DORCHESTER TX 75459-2421

VINCENT , JIMMY
1495 TAYLOR RD
HOWE TX 75459-2511

VINCENT , LARRY
11831 FM 902
DORCHESTER TX 75459-2421

VINCENT , LARRY W
1471 TAYLOR RD
HOWE TX 75459-2511

VODRY , KIMBERLY
469 MELTON RD
SHERMAN TX 75092-6507

VODRY , MARK
469 MELTON RD
SHERMAN TX 75092-6507

VONBEHREN , JENNY
1219 W FARMINGTON RD
VAN ALSTYNE TX 75495-2274

VOTO , JAYMISON BELLA
1717 TAYLOR RD
HOWE TX 75459-2500

VOTO , CAMPBELL
1717 TAYLOR RD
HOWE TX 75459-2500

VOTO , JAY
1717 TAYLOR RD
HOWE TX 75459-2500

VOTO , JAY DEE
1717 TAYLOR RD
HOWE TX 75459-2500

VOTO , LYNSEY
1717 TAYLOR RD
HOWE TX 75459-2500

VRLA , ALVIN & SHARON
4997 DAGNAN RD
HOWE TX 75459-2005

W , DARREN
PO BOX 325
HOWE TX 75459-0325

WALDRUM , GLENN & SHIRLEY
1502 PLEASANT HOME RD
SHERMAN TX 75092-7908

WALDRUM , LEONARD G
1502 PLEASANT HOME RD
SHERMAN TX 75092-7908

WALDRUM JR , MR LEONARD G
1502 PLEASANT HOME RD
SHERMAN TX 75092-7908

WALKER , MONTE
505 CASSANDRA ST
HOWE TX 75459-3689

WALKER , PAULA
116 W CHURCH ST
ROYSE CITY TX 75189-2302

WALKER JR , PHILLIP
618 S WACO ST
VAN ALSTYNE TX 75495-7102

WALL , JACK A
3926 WINDSOR AVE
DALLAS TX 75205-1745

WANG , BIHFANG
6719 RUTLEDGE RD
GARLAND TX 75044-2821

WANG , BORMING
6719 RUTLEDGE RD
GARLAND TX 75044-2821

WANG , BRIAN
6719 RUTLEDGE RD
GARLAND TX 75044-2821

WANG , BRIAN
1516 GRACE LN
WYLIE TX 75098-1873

WANG , JEFF
PO BOX 3328
SHERMAN TX 75091-3328

WANG , JIEFEI
PO BOX 3328
SHERMAN TX 75091-3328

WARD , JOHN
931 HOG CREEK RD
COLLINSVILLE TX 76233-1520

WARD , MINGYAN
931 HOG CREEK RD
COLLINSVILLE TX 76233-1520

WARREN , CAMERYN P
523 E HUGHES ST
COLLINSVILLE TX 76233-5476

WASP , MR KEVIN
1408 CRESCENT VIEW DR
ANNA TX 75409-0297

WASSOM , JACQUELINE
1806 S TRAVIS AVE
DENISON TX 75021-6517

WATSON , MANUAL
200 JARESH LN
HOWE TX 75459-2120

WATSON , WYATT
3200 NORTHGATE DR
SHERMAN TX 75092

WATTS , SHELBIE
2391 E STATE HIGHWAY 121
LEWISVILLE TX 75056-5004

WEAVER , JARED
407 MUSTANG TRL
CELINA TX 75009-4586

WEAVER , LANISHA
10367 FM 121
VAN ALSTYNE TX 75495-3404

WEBSTER , MR WILLIAM
45 PISTACHIO LN
SHERMAN TX 75092-8723

WEDA , JOHN
1000 CORTEZ ST
DENISON TX 75020-3824

WEEMS , CYNTHIA L
60 TEE TAW CIR
SHERMAN TX 75092-9510

WEEMS , RUDY
60 TEE TAW CIR
SHERMAN TX 75092-9510

WEINMANN , CASEY
852 SMITH RD
HOWE TX 75459-2846

WELCH , ROBERT
11831 FM 902
DORCHESTER TX 75459-2421

WELLS , GERALD
74 MOUNTAIN VIEW CIR
SHERMAN TX 75090-5180

WELLS , JOHN
1241 VINEYARD RD
GUNTER TX 75058-3142

WHALEY , MONIQUE
1429 CLAYTON LN
CELINA TX 75009-3828

WHALEY , STEVE
1429 CLAYTON LN
CELINA TX 75009-3828

WHEELER , SHAYLA
144 SAGE BRUSH LN
DENISON TX 75021-4250

WHEELER , AMY
2813 FAWNWOOD CT
SHERMAN TX 75092-4634

WHITE , JOSEPH
PO BOX 967
VAN ALSTYNE TX 75495-0967

WHITE , KEN
302 CHURCH ST
COLLINSVILLE TX 76233-5452

WHITE , JENNIFER
297 STARK LN
SHERMAN TX 75090-3403

WHITELEY , RONNIE
278 PRECINCT RD
HOWE TX 75459-2104

WHITFIELD , EDWARD
209 WALNUT ST
HOWE TX 75459-4541

WHITFIELD , MRS MONICA L
209 WALNUT ST
HOWE TX 75459-4541

WHITMIRE , JEFF COMMISSIONER PRECINCT 1
GRAYSON COUNTY
STE 15
100 W HOUSTON ST
SHERMAN TX 75090-6019

WHITMORE , CHRISTINE
2834 ELLIOTT RD
SHERMAN TX 75092-8394

WHITTEN , JIM
WHITTEN COMMERCIAL REALTY LLC
1303 BIRDS FORT TRL
ARLINGTON TX 76005-1251

WILDMAN , CAROLYN
6225 STATE HIGHWAY 289
DORCHESTER TX 75459-2083

WILDMAN , TERESA
5W RANCH
13852 FM 902
DORCHESTER TX 75459-2115

WILLIAMS , APRIL
301 SEASONS W
SHERMAN TX 75092-9714

WILLIAMS , GABRIEL
302 SEASONS W
SHERMAN TX 75092-9716

WILLIAMSON , RUTH E N COX
2341 CANYON CREEK DR
SHERMAN TX 75092-2301

WILLIAMSON , JENNIFER
1319 TOBIN ST
HOWE TX 75459-2949

WILMOTH , JEFFREY
715 THATCHER ST
DENISON TX 75020-7948

WILSON , AIMEE
US EPA
STE 500
1201 ELM ST
DALLAS TX 75270-2102

WILSON , ANGELA
176 SNAP RD
SHERMAN TX 75090-5551

WILSON , KEVIN
HOWE INDEPENDENT SCHOOL DISTRICT
105 W TUTT ST
HOWE TX 75459-4702

WILSON , KEVIN
555 OLD HIGHWAY 6
HOWE TX 75459-4466

WILSON , DUSTIN RAY
1501 RIDGEWAY DR
SHERMAN TX 75092-3211

WILSON , KEVIN
105 W TUTT ST
HOWE TX 75459-4702

WINGATE , JENNITA
1040 ALEXIS DR
POTTSBORO TX 75076-7080

WISE , MATTHEW
6118 STATE HIGHWAY 289
HOWE TX 75459-2080

WYNN , KRISTA LUCAS
PO BOX 411
WHITESBORO TX 76273-0411

WYNN , KRISTA LUCAS
7322 HWY 289
DORCHESTER TX 75459-2118

YAMARINO , MATT R
APT 1723
7200 DALLAS PKWY
PLANO TX 75024-5008

YARBROUGH , JACE
9285 CULP BRANCH RD
SANGER TX 76266-4910

YATES , RON & TERESA
4400 OLD SOUTHMAYD RD
SHERMAN TX 75092-4938

YUAN , CAROLINE
99 INTERNATIONAL GROUP LLC
637 BELDON RD
HOWE TX 75459-2516

YUAN , CAROLINE
2200 NW GREEN OAKS BLVD
ARLINGTON TX 76012-5100

ZARALLO , ANGELA
1117 MACGREGOR LN
GUNTER TX 75058-4246

ZEY , MRS REBECCA
171 GREEN MEADOW CT
GUNTER TX 75058-3184

ZINN , CYNTHIA
207 OAK ESTATES RD
POTTSBORO TX 75076-6387

ZINN , DR. SAVANNA
405 MARQUETTE DR
VAN ALSTYNE TX 75495-7034

ZWEIFEL-GIBSON , TRACIE
949 S DALLAS ST
VAN ALSTYNE TX 75495-4438

State of Texas
County of Travis

MAY 21 2025

I hereby certify this is a true and correct copy of a Texas Commission on Environmental Quality (TCEQ) document, which is filed in the Records of the Commission. Given under my hand and the seal of office.

Veronica Barnes, Custodian of Records
Texas Commission on Environmental Quality

TCEQ Commissioners' Integrated Database - All Activity Actions

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Activity Action List:

Date	Document Type	Action
06/25/2025	SOAH HEARING	SCHEDULED
04/15/2025	RESPONSE TO COMMENTS	MAILED
03/20/2025	TCEQ DOCKET NUMBER	REQUESTED
03/20/2025	TCEQ DOCKET NUMBER	ISSUED
03/20/2025	DIRECT REFERRAL - APPLIC	RECEIVED
03/18/2025	RESPONSE TO COMMENTS	RECEIVED
08/21/2024	ALTERNATIVE LANGUAGE VERIFICATION FORM	RECEIVED
08/21/2024	AVAILABILITY VERIFICATIO	RECEIVED
08/08/2024	COMMENT PERIOD	END
07/22/2024	ALTERNATIVE LANGUAGE TEARSHEET	RECEIVED
07/22/2024	AFFIDAVIT	RECEIVED
07/22/2024	NEWSPAPER TEARSHEET	RECEIVED
07/22/2024	ALTERNATIVE LANGUAGE AFFIDAVIT	RECEIVED
07/09/2024	NOTICE OF APPLICATION	PUBLISHED
07/09/2024	ALTERNATIVE LANGUAGE NOTICE	PUBLISHED
06/18/2024	NOTICE OF APPLICATION	MAILED
06/17/2024	LETTER	SENT TO
06/14/2024	NOTICE OF APPLICATION	RECEIVED
04/05/2024	ALTERNATIVE LANGUAGE VERIFICATION FORM	RECEIVED
04/05/2024	AVAILABILITY VERIFICATIO	RECEIVED
03/27/2024	COMMENT PERIOD	END
03/25/2024	PUBLIC MEETING	SCHEDULED
03/25/2024	PUBLIC MEETING	HELD
02/28/2024	AFFIDAVIT - NAPD	RECEIVED
02/28/2024	NEWSPAPER TEARSHEET	RECEIVED
02/22/2024	NOTICE - PRELIM DECISION	PUBLISHED
02/22/2024	NOTICE OF PUBLIC MEETING	PUBLISHED
02/13/2024	NOTICE - PRELIM DECISION	RECEIVED
02/13/2024	NOTICE - PRELIM DECISION	MAILED
02/13/2024	NOTICE OF PUBLIC MEETING	MAILED

02/13/2024	NOTICE OF PUBLIC MEETING	RECEIVED
02/09/2024	NOTICE OF PUBLIC MEETING	MAILED
02/09/2024	NOTICE - PRELIM DECISION	MAILED
02/08/2024	NOTICE OF PUBLIC MEETING	RECEIVED
02/08/2024	NOTICE - PRELIM DECISION	RECEIVED
01/23/2024	AVAILABILITY VERIFICATIO	RECEIVED
01/23/2024	ALTERNATIVE LANGUAGE VERIFICATION FORM	RECEIVED
01/22/2024	LETTER	SENT TO
01/27/2022	NEWSPAPER TEARSHEET	RECEIVED
01/27/2022	AFFIDAVIT - NORI	RECEIVED
12/19/2021	NOTICE OF RECEIPT/INTENT	PUBLISHED
11/19/2021	NOTICE OF RECEIPT/INTENT	MAILED
11/18/2021	LETTER	SENT TO
11/18/2021	NOTICE OF RECEIPT/INTENT	RECEIVED
11/18/2021	ADMIN REVIEW	COMPLETE
11/08/2021	APPLICATION	RECEIVED

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