

**From:** [Jacqueline CLARK](#)  
**To:** [185Rule](#)  
**Subject:** Clean Air Act Section 185 Comment  
**Date:** Monday, September 9, 2024 8:48:03 PM

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Thank you for the opportunity to comment on the Texas Council on Environmental Quality's proposal to assess fees on Holcim's production facility in association with Section 185 of the Clean Air Act.

Under the fee system proposed by TCEQ, Holcim US would be assessed large financial penalties for our NOx emissions even though we are--and have been--in full compliance with all applicable state and federal regulations for this criteria pollutant, for nearly two decades. We estimate that Holcim is facing up to \$16 million in penalties for a problem that we did not create and have no power to resolve.

Our Midlothian facility directly employs nearly 150 employees, and supports thousands of additional jobs associated with the distribution and use of our products to build and maintain the roads, bridges, public works and the commercial and residential buildings that make our region such a desirable place to live and work.

Midlothian has been a leader in environmental performance, notably as the first cement plant in the country to fully convert to low-carbon OneCem® Portland limestone cement (PLC). We embrace a community-focused approach, supporting local organizations and events, including learning activities in STEM and \$40k in grants for Midlothian Independent School District, and donating 100 acres of land to the City of Midlothian to create Mockingbird Nature Park.

With this track record in mind, we strongly urge you to avoid adopting a plan that penalizes a company like ours, which has operated within regulatory requirements. The outcome would be devastating for our business while having no impact on the causes of non-compliance.

Thank you for the opportunity to share these informal comments; we look forward to an opportunity to weigh in more formally as your process allows.

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Melissa Carey  
Head of Climate, ESG Policy and Government Affairs  
Holcim US

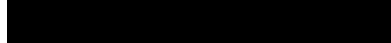
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