

From: [David Ramirez](#)
To: [REDACTED]
Cc: [Ramiro Garcia](#); [Craig Pritzlaff](#); [David Bower](#); [Anita Keese](#); [Susan Johnson](#)
Subject: RE: GCC Permian Odessa Cement Plant-Extension Request
Date: Wednesday, January 13, 2021 7:58:39 AM
Attachments: [image001.png](#)

Good morning Ms. Vance,

As of October 15, 2020, the TCEQ is exercising enforcement discretion on a case-by-case base for regulated entities that are experiencing impacts due to the COVID-19 pandemic. The TCEQ has evaluated your request for enforcement discretion (COVID-19 related challenges) for the Odessa Cement Plant, RN100213305, owned and operated by GCC Permian, LLC. This enforcement discretion requests an extension of time to perform [REDACTED] sampling and performance testing for Kiln 1 required under [REDACTED] of New Source Review (NSR) Permit 5296, PSDTX24M2, and GHGPSDTX110.

Your enforcement discretion is effective until **April 30, 2021**. The required tests shall be completed as soon as practicable, as conditions allow, by this date. This discretion is limited to the Texas Commission on Environmental Quality and does not limit the U.S. Environmental Protection Agency's ability to enforce federal regulations.

Please maintain records adequate to document activities related to any noncompliance under enforcement discretion, including details of GCC Permian, LLC's best efforts to comply.

Regards,
David A. Ramirez, Area Director
Border and Permian Basin Area
Texas Commission on Environmental Quality

From: Vance Sarah <[REDACTED]>
Sent: Friday, December 11, 2020 5:10 PM
To: OCE <OCE@tceq.texas.gov>
Cc: Ryan (Reagyn) Slocum <Ryan.Slocum@Tceq.Texas.Gov>; Disha Gadre
<[REDACTED]> <[REDACTED]> Brian Mensinger
<[REDACTED]>
Subject: GCC Permian Odessa Cement Plant-Extension Request

Good afternoon,

GCC Permian, LLC's Odessa Cement Plant is submitting the attached extension request regarding sampling requirements in its New Source Review Permit No. 5296.

As is detailed in the letter, one of the production lines at the plant has been idled since June due to the COVID related economic downturn and reduced market demand. GCC is requesting additional time to complete the permit required sampling.

Please let me know if you have any questions or need any additional information.

Thanks!

Sarah



Sarah Vance
Environmental Manager

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December 11, 2020

Via Email: OCE@tceq.texas.gov

Office of Compliance and Enforcement
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, TX 78753

RE: GCC Permian – Odessa Cement Plant
Kiln 1 - [REDACTED] Sampling - Extension Request
RN100213305
NSR Permit 5296

Dear Compliance Officer,

GCC Permian (GCC) owns and operates a Portland cement manufacturing plant in Odessa, TX. The Texas Commission on Environmental Quality (TCEQ) issued an amendment to Permit 5296 (the Permit) for operations at the Odessa Cement Plant on June 12, 2020 by [REDACTED]. With this submittal, GCC is requesting additional time to perform [REDACTED] sampling for Kiln 1 required under [REDACTED].

The permit authorizes the use of Selective Non-Catalytic Reduction (SNCR) system which utilizes injection of [REDACTED] to control of oxides of nitrogen (NO_x) emissions from the cement kilns. [REDACTED] of the Permit states that:

“The [REDACTED] concentration in Kiln Nos. 1, 2 and 3 Exhaust Stack 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 [REDACTED] slip is only required on days when the SNCR unit is in operation. The [REDACTED] measurements shall be used to determine compliance with the MAERT.”

“Sampling of Kiln No. 1 and 2 shall occur within six months of permit issuance and at such other times as may be required by the TCEQ Executive Director. Requests for additional time to perform sampling shall be submitted to the TCEQ Midland Regional Office.”

As stated, GCC is required to conduct [REDACTED] sampling on Kilns 1, 2, and (not yet built) 3 within six months of the June 12th, 2020 Permit issuance. While sampling on Kiln 2 has already been completed, low market demand caused Kiln 1 to be shut down in June and sampling cannot occur until the unit is brought back online and stabilized. As a result of COVID-19 impacts and the related oil and gas (O&G) industry economic slowdown, Kiln 1 remains in idle mode now without immediate plans to bring it into operation.

Cement kilns are designed for continuous operation and, under normal economic conditions, do not usually experience more than a few weeks of downtime each year. Units that are idled for significant amounts of time typically require a longer stabilization period upon startup, as is allowed under the performance testing requirements in the Portland Cement National Emission Standard for Hazardous Air Pollutants (NESHAP). Per 40 CFR 63.1348(a):

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[REDACTED]



“Any affected source that was unable to demonstrate compliance before the compliance date due to being idled, or that had demonstrated compliance but was idled during the normal window for the next compliance test, must demonstrate compliance within 180 days after coming out of the idle period.”

Performing [REDACTED] sampling on Kiln 1 during the stabilization could cause the results not to be representative of normal operations. Therefore, in alignment with the provisions of the Portland cement NESHAP, GCC is requesting an additional 180-day period from the Kiln 1 re-start date to comply with the requirements of [REDACTED].

The 180-day period will allow GCC time to inspect and replace worn parts, stabilize the kiln, and tune the [REDACTED] injection system. This additional time will ensure that testing is performed while the kiln is in normal operation and representative [REDACTED] data is collected.

Thank you for your time and consideration on this matter. If you have any questions or require additional information, please contact me at (505) 286-6026 or [REDACTED].

Sincerely,

A handwritten signature in blue ink that reads "Sarah Vance".

Sarah Vance
Environmental Manager
GCC Permian, LLC

cc: Disha Gadre (Trinity Consultants)
Ryan Slocum (TCEQ Midland Regional Office)