

## Permit Alteration Source Analysis & Technical Review

Company	<b>Holcim (Texas) Limited Partnership</b>	Permit Numbers	<b>8996 and PSDTX454M3</b>
City	<b>Midlothian</b>	Project Number	<b>186336</b>
County	<b>Ellis</b>	Account Number	<b>ED-0099-J</b>
Project Type	<b>Revision</b>	Regulated Entity Number	<b>RN100219286</b>
Project Reviewer	<b>Mr. Tan Nguyen, P.E.</b>	Customer Reference Number	<b>CN601231459</b>
Site Name	<b>Portland Cement Manufacturing Facility</b>		

### Project Overview

Holcim operates two cement clinker production lines at the Midlothian facility. Holcim requested the use of additional alternative fuels for the kilns and precalciners. The requested alternative fuels include the following:

- \* materials collected at municipal and post-industrial recycling facilities (including paper, cardboard, and plastics);
- \* materials collected during or generated from carpet recycling (including carpet fiber, carpet backing, and carpet pads; and
- \* other non-waste fuels that meet the requirements of Title 40 Code of Federal Regulations (40 CFR) §241.3 and §241.4 (regarding Non-Hazardous Secondary Materials).

### Emission Summary

This project does not authorize an increase in emission or production.

### Request for Comments

Received From	Program/Area Name	Reviewed By	Comments
Region:	<b>4</b>	<b>Luke Jones</b>	<b>Region responded with no comments.</b>
City:	<b>Midlothian</b>	<b>n/a</b>	
County:	<b>Ellis</b>	<b>n/a</b>	
Toxicology:		<b>n/a</b>	
Compliance:		<b>n/a</b>	
Legal:		<b>n/a</b>	

### Review Summary

The materials collected at municipal and post-industrial recycling facilities (including paper, cardboard, and plastics) and from carpet recycling (including carpet fiber, carpet backing, and carpet pads) are commonly authorized as alternative fuels at other cement production facilities in Texas. These materials contain contaminants (i.e., metals, sulfur, etc.) in quantities less than the currently authorized primary fuels (i.e., coal, petroleum coke, and natural gas). Therefore, the firing of these materials will not emit higher emissions than the currently authorized primary fuels.

The firing of other non-waste fuels meeting the requirements of 40 CFR § 241.3 and §241.4 (notice of final rule for publication was signed by EPA on December 20, 2012) for non-hazardous secondary materials will also not emit higher emissions than the currently authorized primary fuels. Special Condition No. 3J requires the permit holder to keep records to show that the non-waste fuels contain contaminants at levels equal to or less than the primary fuels.

To demonstrate compliance, the permit requires the permit holder to track and keep records of the alternative fuels, including amount received, amount fired, percent of alternative fuel to total fuel fired, heating value of the material, and contaminant content of the other non-waste fuels. The firing of alternative fuels is limited to 60 % of the total heat input into the kiln system.

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**Impacts Evaluation - 30 TAC 116.111(a)(2)(J)**

Was modeling conducted?	<b>No</b> - Modeling is not required since this project does not authorize an increase in emission or change to any emission point parameter.	Type of Modeling:	<b>n/a</b>
Will GLC of any air contaminant cause violation of NAAQS?			<b>n/a</b>
Is this a sensitive location with respect to nuisance?			<b>No</b>
[§116.111(a)(2)(A)(ii)] Is the site within 3000 feet of any school?			<b>No</b>

**Permit Concurrence and Related Authorization Actions**

Is the applicant in agreement with special conditions?	<b>Yes</b>
Company representative(s):	<b>Giri Bhavani</b>
Contacted Via:	<b>Phone: 972-923-5811</b>
Date of contact:	<b>01/28/2013</b>
Other permit(s) or permits by rule affected by this action:	<b>No</b>
List permit and/or PBR number(s) and actions required or taken:	<b>n/a</b>

Project Reviewer	Date	Team Leader/Section Manager/Backup	Date
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