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VIA E-MAIL AND CERTIFIED MAIL

July 27, 2020

Cooper Garbe  
707 North Robinson  
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Oklahoma City, OK 73101-1677  
[cooper.garbe@deq.ok.gov](mailto:cooper.garbe@deq.ok.gov)

RE: DEQ's request for regional haze four-factor analysis  
Holcim US Inc. – Ada Plant

Dear Mr. Garbe,

In accordance with Ms. Kendal Stegmann's July 1, 2020 letter ("the DEQ letter"), this response is provided to you with a copy to Ms. Melanie Foster.

The DEQ letter requests that Holcim perform a four-factor analysis of all potential control measures for SO<sub>2</sub> emissions from the Kiln at its Ada Plant. It goes into detail regarding what technical, operational, and economic information Holcim should provide. Holcim understands that the Ada Plant Kiln was selected by the DEQ based on a source-screening analysis that used a metric known as % EWRT\*Q/d, and that the full results of that analysis are summarized in a June 17, 2020 presentation.<sup>1</sup>

Based on the DEQ's presentation (slide 60), its analysis of the Ada Plant's SO<sub>2</sub> emissions resulted in a % EWRT\*Q/d of 1.43 %, which is greater than the DEQ's threshold of 0.5 %.<sup>2</sup> The presentation also shows a Q/d value of 12.00789. As confirmed during your July 16, 2020 conversation and subsequent e-mail with Mr. Jeremy Jewell of Trinity Consultants, Q/d is the emission rate of SO<sub>2</sub> in tons per year (tpy), Q, divided by the distance from the Ada Plant to the Wichita Mountains Class I area in kilometers (km), d. Per your July 16, 2020 e-mail to Mr. Jewell, the DEQ used calendar year 2016 emissions, 2,203 tpy, as the basis for Q, and a d value of 183 km.

The use of 2016 emissions as the basis of the DEQ's analysis renders the results invalid because the Ada Plant no longer operates the kilns that were in operation in 2016. The old kilns were dismantled in 2016/17, and a new kiln began operating on February 14, 2017. In other words, the request is for an analysis on emission units that no longer exist.

<sup>1</sup>[https://www.deq.ok.gov/wp-content/uploads/air-division/AQAC\\_2020\\_JUN\\_Presentations\\_revised.pdf](https://www.deq.ok.gov/wp-content/uploads/air-division/AQAC_2020_JUN_Presentations_revised.pdf)  
(slides 55 – 67).

<sup>2</sup> The Ada Plant's NO<sub>x</sub> emissions were also evaluated. The result, as presented, was a % EWRT\*Q/d of 0.38 %, which is below the DEQ threshold.

Moreover, the SO<sub>2</sub> emissions from the new kiln are substantially less than the emissions from the old kilns: 45 tpy in 2017, 68 tpy in 2018, and 84 tpy in 2019. If the DEQ has selected or reviewed any of these more recent and representative operating year Ada would have fallen well below screening criteria. Using the maximum of the annual emission rates for the new kiln, the  $Q/d$  value for the Ada Plant becomes 0.46, or 26 times less than the DEQ's presented  $Q/d$  value. According to Mr. Jewell, the %  $EWRT*Q/d$  value would not necessarily decrease by the same amount, but it is reasonable to conclude that it would decrease to less than the 0.5 % threshold set by the DEQ. As such, the DEQ's source-screening method excludes the Ada Plant, in its current configuration, from the four-factor analysis requirement.

For these reasons – that the DEQ's request pertains to non-existent emission units and that the Ada Plant screens out of the requirement based on its current emissions – Holcim requests that the DEQ formally rescind its July 1, 2020 request for a four-factor analysis for the Ada Plant.

Thank you for your consideration of this request. Please contact Mr. Mark Miller at (972) 221-4646 or Mr. Jeremy Jewell at (918) 622-7111 ext. 1 if you have any questions regarding this request.

Sincerely,



Nancy Caperton  
Ada Plant Manager

ec: Melanie Foster (melanie.foster@deq.ok.gov)  
Mark Miller (mark.miller@aggregate-us.com)  
Jeremy Jewell (jjewell@trinityconsultants.com)