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GOVERNOR

**State of New Mexico**  
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**RON CURRY**  
SECRETARY

**DERRITH WATCHMAN-MOORE**  
DEPUTY SECRETARY

October 4, 2006

**TO:** Owners and operators of concrete batch plant facilities

**Subject:** Transition Schedule for Owners and Operators of concrete batch plant facilities

In October of 2001, the EPA issued a revised edition of the AP-42 emission factors. The revised uncontrolled emission factors from Section 11.12, Concrete Batching, make it probable that few, if any, concrete batch plants now qualify to operate without a permit. Using these new emission factors, state regulation (20.2.72 NMAC) requires that both new and existing concrete batch plants (CBP) obtain an air quality permit, even if the facility has previously received a NOI or a no permit required letter from the Bureau.

On April 3, 2003, the Air Quality Bureau issued a letter to owners and operators of CBP facilities informing them that once the GCP-5, general construction permit for concrete batch plants, is issued, concrete batch plants would be required either to register to operate under the GCP-5 or to apply for a regular 20.2.72 NMAC permit.

On September 12, 2006, the New Mexico Air Quality Bureau (AQB) issued the GCP-5, a general construction permit for concrete batch plant facilities. A copy of this permit, the registration form, and instructions can be found at the Air Quality Bureau web site at: [http://www.nmenv.state.nm.us/aqb/permit/app\\_form.html](http://www.nmenv.state.nm.us/aqb/permit/app_form.html).

The Department is authorizing concrete batch plant owners and operators who are currently operating without a permit issued by the Department, a period of twelve months from the issuance of the GCP-5 (until September 12, 2007) to have either a GCP-5 or a regular Part 72 permit. Any facility that would prefer to operate under a regular 20.2.72 NMAC permit may do so by submitting a complete application using the Universal Application Form.

In order to avoid these applications arriving simultaneously, the Bureau is requesting the applications be submitted on the following schedule, based on the first letter in the facility's name.

- A, F, K, P, U, & Z: March 12 – April 12, 2007
- B, G, L, Q, & V: April 12 – May 12, 2007
- C, H, M, R, & W: May 12 – June 12, 2007
- D, I, N, S, & X: June 12 – July 12, 2007
- E, J, O, T, & Y: July 12 – August 12, 2007

Any facility may elect to submit a GCP-5 application earlier than this schedule with prior approval of the Bureau. Please call, e-mail, or write Les Drapela (505-955-8001), [lester.drapela@state.nm.us](mailto:lester.drapela@state.nm.us), or Les Drapela, Air Quality Bureau, 2048 Galisteo, Santa Fe, NM 87505.

For any clarifications, please contact Liz Kuehn: (505) 955-8099 or by e-mail: [liz.kuehn@state.nm.us](mailto:liz.kuehn@state.nm.us).

Sincerely,

***Ted Schooley***

Ted Schooley  
NSR Section Manager