



**BILL RICHARDSON**  
GOVERNOR

*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**  
*AIR QUALITY BUREAU*  
2048 Galisteo  
Santa Fe, New Mexico 87505  
Telephone (505) 827-1494  
Fax (505) 827-1523



**RON CURRY**  
SECRETARY

**DERRITH WATCHMAN-MOORE**  
DEPUTY SECRETARY

Date: April 30, 2003  
Subject: Development of Concrete Batch Plant GCP  
To: All Interested Parties:

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 under a Notice of Intent. Using these new emission factors, state regulation (20.2.72 NMAC) requires that both new and existing concrete batch plants (CBP) obtain a regular NSR permit.

In order to facilitate this permit transition, the Air Quality Bureau is in the process of developing a General Construction Permit especially for Concrete Batch Plants (GCP-*{CONCRETE}*). If this approach is implemented the public will benefit from cleaner air because models assume worst-case conditions; NMED will benefit from reduced processing effort; and Applicants will benefit from less paperwork, lower fees, and faster turn-around time. How this change affects existing and proposed facilities:

- All new CBP facilities are required to get a permit under 20.2.72 NMAC until such time as GCP-*{Concrete}* is issued.
- Existing CBP facilities that are currently operating under an NOI may continue to do so until the Department issues the GCP-*{CONCRETE}*, unless the facility undergoes a modification as defined in 20.2.72.A.2. NMAC.
- Until the GCP-*{CONCRETE}* is issued, any existing CBP facility that meets the criteria for a permit modification under 20.2.72.A.2 NMAC is required to obtain a regular permit under 20.2.72 NMAC.
- Once the GCP-*{CONCRETE}* issue is resolved, all CBP facilities currently operating under an NOI must apply for a permit (either GCP-*{CONCRETE}* or a regular permit) within four (4) months of notification by the Bureau.

We have notified Sandy Fentiman of the NM Ready Mix Concrete & Aggregates Association of this situation. Beginning in late April, NMED will host a series of meetings to discuss the GCP approach and get input from Ms. Fentiman, representatives of the Concrete Industry, and other interested parties. The most current draft documents and information about ongoing activities will be updated frequently on a web page at <http://www.nmenv.state.nm.us>. The third section of that page provides information about the Bureau's current activities. Click on the link to "Concrete Batch Plant General Construction Permit."

If you have any questions or cannot access the web-page, please contact me.

Ted Schooley  
NSR Permits Section Manager  
[ted\\_schooley@nmenv.state.nm.us](mailto:ted_schooley@nmenv.state.nm.us)  
505-955-8088