# **Section 6**

## **All Calculations**

**Show all calculations** used to determine both the hourly and annual controlled and uncontrolled emission rates. All calculations shall be performed keeping a minimum of three significant figures. Document the source of each emission factor used (if an emission rate is carried forward and not revised, then a statement to that effect is required). If identical units are being permitted and will be subject to the same operating conditions, submit calculations for only one unit and a note specifying what other units to which the calculations apply. All formulas and calculations used to calculate emissions must be submitted. The "Calculations" tab in the UA2 has been provided to allow calculations to be linked to the emissions tables. Add additional "Calc" tabs as needed. If the UA2 or other spread sheets are used, all calculation spread sheet(s) shall be submitted electronically in Microsoft Excel compatible format so that formulas and input values can be checked. Format all spread sheets and calculations such that the reviewer can follow the logic and verify the input values. Define all variables. If calculation spread sheets are not used, provide the original formulas with defined variables. Additionally, provide subsequent formulas showing the input values for each variable in the formula. All calculations, including those calculations are imbedded in the Calc tab of the UA2 portion of the application, the printed Calc tab(s), should be submitted under this section.

**Tank Flashing Calculations**: The information provided to the AQB shall include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., NOI, permit, or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis. If Hysis is used, all relevant input parameters shall be reported, including separator pressure, gas throughput, and all other relevant parameters necessary for flashing calculation.

**SSM Calculations**: It is the applicant's responsibility to provide an estimate of SSM emissions or to provide justification for not doing so. In this Section, provide emissions calculations for Startup, Shutdown, and Routine Maintenance (SSM) emissions listed in the Section 2 SSM and/or Section 22 GHG Tables and the rational for why the others are reported as zero (or left blank in the SSM/GHG Tables). Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app\_form.html) for more detailed instructions on calculating SSM emissions. If SSM emissions are greater than those reported in the Section 2, Requested Allowable Table, modeling may be required to ensure compliance with the standards whether the application is NSR or Title V. Refer to the Modeling Section of this application for more guidance on modeling requirements.

**Glycol Dehydrator Calculations**: The information provided to the AQB shall include the manufacturer's maximum design recirculation rate for the glycol pump. If GRI-Glycalc is used, the full input summary report shall be included as well as a copy of the gas analysis that was used.

Road Calculations: Calculate fugitive particulate emissions and enter haul road fugitives in Tables 2-A, 2-D and 2-E for:

- 1. If you transport raw material, process material and/or product into or out of or within the facility and have PER emissions greater than 0.5 tpy.
- 2. If you transport raw material, process material and/or product into or out of the facility more frequently than one round trip per day.

#### Significant Figures:

A. All emissions standards are deemed to have at least two significant figures, but not more than three significant figures.B. At least 5 significant figures shall be retained in all intermediate calculations.

**C.** In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:

- (1) If the first digit to be discarded is less than the number 5, the last digit retained shall not be changed;
- (2) If the first digit discarded is greater than the number 5, or if it is the number 5 followed by at least one digit other than the number zero, the last figure retained shall be increased by one unit; **and**
- (3) If the first digit discarded is exactly the number 5, followed only by zeros, the last digit retained shall be rounded upward if it is an odd number, but no adjustment shall be made if it is an even number.
- (4) The final result of the calculation shall be expressed in the units of the standard.

**Control Devices:** In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions. The applicant can indicate in this section of the application if they chose to not take credit for the reduction in emission rates. For notices of intent submitted under 20.2.73 NMAC, only uncontrolled emission rates can be considered to determine applicability unless the state or federal Acts require the control. This information is necessary to determine if federally enforceable conditions are necessary for the control device, and/or if the control device produces its own regulated pollutants or increases emission rates of other pollutants.

### **Uncontrolled Particulate Emission Rates**

Estimates for Uncontrolled Material Handling (PM<sub>2.5</sub>, PM<sub>10</sub> and PM)

Typical composition of one cubic yard of concrete produced at the Alto Concrete Batch Plant (CBP) will be:

Materials	Weight Per Cubic Yard (in lbs)	Weights Per 150 Cubic Yards (in ton)					
Cement	489	30.6					
Fly Ash	132	8.3					
Water	260	16.3					
Coarse Aggregate(gravel)	1900	118.8					
Fine Aggregate (sand)	1100	68.8					
Total	3881	242.6					

**Concrete Design Mix for One Cubic Yard** 

Hourly raw material throughputs used in material handling emission equations are based on the tons per hour throughput.

Aggregate/Sand = 187.5 tons/hour Cement = 30.6 tons/hour Fly Ash = 8.3 tons/hour

To estimate material handling uncontrolled particulate emission rates for aggregate handling operations (loading storage piles, loading feeder, loading the 4-bin aggregate feeder), an emission equation was obtained from EPA's <u>Compilation of Air Pollutant Emission Factors, Volume I: Stationary Point and Area Sources</u>, Fifth Edition, Section 13.2.4 (1/1995), where the k is a constant (PM = 0.74, PM10 = 0.35, PM2.5 = 0.053). Input wind speed for maximum hourly emission rates is the NMED Default of 11 mph and input windspeed for the annual emission rates is the Ruidoso 1996 – 2006 wind speed of 8.3 mph. The moisture content for the aggregate of 1.77% and sand of 4.17% (AP-42 Section 11.12, Table 11.12-2, Footnote b). The weighted average moisture content for sand and aggregate is 2.65% ((1.77 \* 213.75 + 4.17 \* 123.75)/337.5). To estimate pre-control particulate emissions rates for aggregate handling transfer points (unloading of the feeder, loading and unloading the aggregate bin/weigh batcher), emission factors were obtained from AP-42 Section 11.19.2, Table 11.19.2-2, "Uncontrolled Conveyor Transfer Point". Uncontrolled PM2.5 emission rate is based on the PM2.5/PM10 k factor of 0.053/0.35 found in AP-42 Section 13.2.4 and PM10 emission factor of 0.00110 lbs/ton.

To estimate uncontrolled particulate emission rates for silo loading, cement/fly ash batcher loading operations, and concrete mixer truck loading, emission equations were obtained from EPA's <u>Compilation of Air Pollutant Emission</u> <u>Factors, Volume I: Stationary Point and Area Sources</u>, Fifth Edition, Section 11.12 (06/06), Table 11.12-2. PM<sub>2.5</sub> emission factor for concrete mixer truck loading emissions were determined using the ratio of uncontrolled truck loading ratio Table 11.12-3 PM10 emission factor \* PM2.5/PM10 (0.05/0.278). PM<sub>2.5</sub> emission factor for cement/fly ash batcher loading emissions were determined using the ratio of uncontrolled mixer loading ratio Table 11.12-4 PM10 emission factor \* PM2.5/PM10 (0.38/1.92). PM<sub>2.5</sub> emission factor for cement silo emissions loading were determined using the ratio of uncontrolled mixer loading ratio Table 11.12-4 PM10 emission factor \* PM2.5/PM10 (0.38/1.92). PM<sub>2.5</sub> emission factor for fly ash silo emissions loading were determined using the ratio of uncontrolled mixer loading ratio Table 11.12-4 PM10 emission factor \* PM2.5/PM10 (0.38/1.92). PM<sub>2.5</sub>

Maximum rated material throughput is 125 cubic yards per hour. Annual uncontrolled emissions in tons per year (tpy) were calculated assuming operation for 8760 hours per year.

#### EPA's AP-42, Section 13.2-4 (01/95)

#### Aggregate Handling Emission Equation – Hourly Emissions

$$\begin{split} &E~(lbs/ton) = k~x~0.0032~x~(U/5)^{1.3}~/~(M/2)^{1.4} \\ &E_{PM}~(lbs/ton) = 0.74~x~0.0032~x~(11/5)^{1.3}~/~(1.77/2)^{1.4} \\ &E_{PM10}~(lbs/ton) = 0.35~x~0.0032~x~(11/5)^{1.3}~/~(1.77/2)^{1.4} \\ &E_{PM2.5}~(lbs/ton) = 0.053~x~0.0032~x~(11/5)^{1.3}~/~(1.77/2)^{1.4} \\ &E_{PM} = 0.00783~lbs/ton;~E_{PM10} = 0.00370~lbs/ton;~E_{PM2.5} = 0.00056~lbs/ton \end{split}$$

#### Sand Handling Emission Equation – Hourly Emissions

$$\begin{split} & E \ (lbs/ton) = k \ x \ 0.0032 \ x \ (U/5)^{1.3} \ / \ (M/2)^{1.4} \\ & E_{PM} \ (lbs/ton) = 0.74 \ x \ 0.0032 \ x \ (11/5)^{1.3} \ / \ (4.17/2)^{1.4} \\ & E_{PM10} \ (lbs/ton) = 0.35 \ x \ 0.0032 \ x \ (11/5)^{1.3} \ / \ (4.17/2)^{1.4} \\ & E_{PM2.5} \ (lbs/ton) = 0.053 \ x \ 0.0032 \ x \ (11/5)^{1.3} \ / \ (4.17/2)^{1.4} \\ & E_{PM} = 0.00236 \ lbs/ton; \ E_{PM10} = 0.00112 \ lbs/ton; \ E_{PM2.5} = 0.00017 \ lbs/ton \end{split}$$

#### Aggregate/Sand Handling Emission Equation – Hourly Emissions

$$\begin{split} &E~(lbs/ton) = k~x~0.0032~x~(U/5)^{1.3}~/~(M/2)^{1.4} \\ &E_{PM}~(lbs/ton) = 0.74~x~0.0032~x~(11/5)^{1.3}~/~(2.65/2)^{1.4} \\ &E_{PM10}~(lbs/ton) = 0.35~x~0.0032~x~(11/5)^{1.3}~/~(2.65/2)^{1.4} \\ &E_{PM2.5}~(lbs/ton) = 0.053~x~0.0032~x~(11/5)^{1.3}~/~(2.65/2)^{1.4} \\ &E_{PM} = 0.00445~lbs/ton;~E_{PM10} = 0.00211~lbs/ton;~E_{PM2.5} = 0.00032~lbs/ton \end{split}$$

#### Aggregate Handling Emission Equation – Annual Emissions

$$\begin{split} &E~(lbs/ton) = k~x~0.0032~x~(U/5)^{1.3}~/~(M/2)^{1.4} \\ &E_{PM}~(lbs/ton) = 0.74~x~0.0032~x~(8.3/5)^{1.3}~/~(1.77/2)^{1.4} \\ &E_{PM10}~(lbs/ton) = 0.35~x~0.0032~x~(8.3/5)^{1.3}~/~(1.77/2)^{1.4} \\ &E_{PM2.5}~(lbs/ton) = 0.053~x~0.0032~x~(8.3/5)^{1.3}~/~(1.77/2)^{1.4} \\ &E_{PM} = 0.00543~lbs/ton;~E_{PM10} = 0.00257~lbs/ton;~E_{PM2.5} = 0.00039~lbs/ton \end{split}$$

#### Sand Handling Emission Equation – Annual Emissions

$$\begin{split} E \ (lbs/ton) &= k \ x \ 0.0032 \ x \ (U/5)^{1.3} \ / \ (M/2)^{1.4} \\ E_{PM} \ (lbs/ton) &= 0.74 \ x \ 0.0032 \ x \ (8.3/5)^{1.3} \ / \ (4.17/2)^{1.4} \\ E_{PM10} \ (lbs/ton) &= 0.35 \ x \ 0.0032 \ x \ (8.3/5)^{1.3} \ / \ (4.17/2)^{1.4} \\ E_{PM2.5} \ (lbs/ton) &= 0.053 \ x \ 0.0032 \ x \ (8.3/5)^{1.3} \ / \ (4.17/2)^{1.4} \\ E_{PM} &= 0.00164 \ lbs/ton; \ E_{PM10} &= 0.00077 \ lbs/ton; \ E_{PM2.5} &= 0.00012 \ lbs/ton \end{split}$$

#### Aggregate/Sand Handling Emission Equation – Annual Emissions

$$\begin{split} &E~(lbs/ton) = k~x~0.0032~x~(U/5)^{1.3} / (M/2)^{1.4} \\ &E_{PM}~(lbs/ton) = 0.74~x~0.0032~x~(8.3/5)^{1.3} / (2.65/2)^{1.4} \\ &E_{PM10}~(lbs/ton) = 0.35~x~0.0032~x~(8.3/5)^{1.3} / (2.65/2)^{1.4} \\ &E_{PM2.5}~(lbs/ton) = 0.053~x~0.0032~x~(8.3/5)^{1.3} / (2.65/2)^{1.4} \\ &E_{PM} = 0.00309~lbs/ton;~E_{PM10} = 0.00146~lbs/ton;~E_{PM2.5} = 0.00022~lbs/ton \end{split}$$

#### EPA's AP-42, Section 11.19.2 (08/04), Table 11.19.2-2

 $\frac{\text{Conveyor Transfer Point Uncontrolled}}{\text{E}_{PM} (lbs/ton) = 0.003 \text{ lbs/ton}; \text{E}_{PM10} (lbs/ton) = 0.0011 \text{ lbs/ton}; \text{E}_{PM2.5} (lbs/ton) = 0.000167 \text{ lbs/ton}}$ 

#### EPA's AP-42, Section 11.12 (06/06), Table 11.12-2

#### **Uncontrolled Emission Factors:**

Process Unit	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	PM2.5 Emission Factor (lbs/ton)
Aggregate Material Handling - Hourly	0.00783	0.00370	0. 00056
Sand Material Handling - Hourly	0.00236	0.00112	0.00017
Aggregate/Sand Material Handling - Hourly	0.00445	0.00211	0.00032
Aggregate Material Handling - Annually	0.00543	0.00257	0. 00039
Sand Material Handling - Annually	0.00164	0.00077	0.00012
Aggregate/Sand Material Handling - Annually	0.00309	0.00146	0.00022
Aggregate Transfer Points	0.0030	0.0011	0.000167
Cement Silo	0.73	0.47	0.0930

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Process Unit	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	PM2.5 Emission Factor (lbs/ton)
Fly Ash Silo	3.14	1.10	0.2177
Cement/Fly Ash Batcher	0.572	0.156	0.0309
Truck Loading	1.118	0.31	0.0558

The following equations were used to calculate the hourly emission rate for each process unit:

Emission Rate (lbs/hour)	= Process Rate (tons/hour) * Emission Factor (lbs/ton)
following equations was used to calc	ulate the annual emission rate for each process unit:

Emission Rate (tons/year) = Emission Rate (lbs/hour) \* Operating Hour (hrs/year) 2000 lbs/ton

Process Unit #	Process Unit Description	Process Rate	PM Emission Rate (lbs/hr)	PM Emission Rate (tons/yr)	PM <sub>10</sub> Emission Rate (lbs/hr)	PM <sub>10</sub> Emission Rate (tons/yr)	PM <sub>2.5</sub> Emission Rate (lbs/hr)	PM <sub>2.5</sub> Emission Rate (tons/yr)
2	Aggregate/Sand Feeder Loading	187.5 tph	0.83	3.66	0.39	1.73	0.060	0.26
3	Feed Hopper Conveyor	187.5 tph	0.56	2.46	0.21	0.90	0.031	0.14
4	4-Bin Aggregate Bin	187.5 tph	0.56	2.46	0.21	0.90	0.031	0.14
5,6	Aggregate Weigh Batcher and Conveyor	187.5 tph	0.56	2.46	0.21	0.90	0.031	0.14
7	Truck Loading	150 cuyd/hr	43.4	190.1	12.0	52.7	2.16	9.48
8	Cement/Fly Ash Batcher	150 cuyd/hr	22.2	97.2	6.05	26.5	1.20	5.25
9	Cement Split Silo	150 cuyd/hr	22.3	97.7	14.4	62.9	2.84	12.5
10	Fly Ash Split Silo	150 cuyd/hr	25.9	113.5	25.9	113.5	9.08	39.7
11	Aggregate/Sand Storage Piles	187.5 tph	1.09	4.78	0.52	2.26	0.078	0.34
	 	TOTALS	117.4	514.3	59.9	262.3	15.5	67.9

 Table 6-1: Pre-Controlled Material Handling Particulate Emissions (PER)

Haul truck travel emissions were estimated using AP-42, Section 13.2.1 (ver.01/11) "Paved Roads" emission equation. Haul trucks will be used to deliver cement, fly ash, aggregate material, sand material, and transport concrete product.

AP-42 13.1 Paved Road (01/11) Equation:						
$E = k(sL)^{0.91*}(W)^{1.02*}[1-P/4N]$		Annual emis	sions only in	clude p factor		
k PM	0.011					
k PM10	0.0022					
k PM25	0.00054					
sL	0.6	road surface	silt loading (	(g/m2) Table 13	3.2.1-2, <	500
P = days with precipitation over 0.01 inches	60	AP-42 Figur	e 13.2.2-1			
N = number of days in averaging period	365					
Fly Ash Truck VMT	214	meter/RT	23	tons/load	8.3	tons/hr
Cement Truck VMT	214	meter/RT	23	tons/load	30.6	tons/hr
Aggregate/Sand Truck VMT	392	meter/RT	23	tons/load	187.5	tons/hr
Concrete Truck VMT	214	meter/RT	12	cuyd/load	125	cuyd/hr
Max. Fly Ash Truck/hr	0.4	truck/hr	3142.2	trucks/yr		
Max. Cement Truck/hr	1.3	truck/hr	11640.3	trucks/yr		
Max. Aggregate/Sand Truck/hr	8.2	truck/hr	71413.0	trucks/yr		
Max Concrete Trucks/hr	<u>10.4</u>	truck/hr	<u>91250.0</u>	trucks/yr		
	20.3	truck/hr	177445.5	trucks/yr		
Vehicle Miles Traveled	3.59997	VMT/hr				
	31,535.7	VMT/yr				
Fly Ash, Cement, Aggregate, Sand Truck weight	26	.5 tons	15-	-ton truck tare		
Concrete Truck weight	4	25 tons				
		PM Ur	ncontrolled			
Max. Truck Emissions Paved Road	0.6883	lbs/hr	2.8	907 tons/yr		
	PM10 Uncontrolled					
	0.1377	lbs/hr	0.5	781 tons/yr		
		PM2.5 U	Jncontrolled			
	0.0338	lbs/hr	0.14	419 tons/yr		

# Estimates for Controlled Material Handling Air Pollutants (PM<sub>2.5</sub>, PM<sub>10</sub>, and PM) (PTE)

No controls will be included for Units 1, 2, or 11 with the exception on limiting annual throughput. Fugitive dust emissions from material handling sources (Units 3, 4, 5, 6) will be controlled by adding water sprays at the exit of the aggregate/sand feed hopper (EPA AP-42 control efficiency of 95.82%).

To estimate material handling control particulate emission rates for aggregate handling operations (loading storage piles, and loading feed hopper), an emission equation was obtained from EPA's <u>Compilation of Air Pollutant Emission</u> <u>Factors, Volume I: Stationary Point and Area Sources</u>, Fifth Edition, Section 13.2.4 (1/1995), where the k is a constant (PM = 0.74, PM10 = 0.35, PM2.5 = 0.053). Input wind speed for maximum hourly emission rates is the NMED Default of 11 mph and input windspeed for the annual emission rates is the Ruidoso 1996 – 2006 wind speed of 8.3 mph. The moisture content for the aggregate of 1.77% and sand of 4.17% (AP-42 Section 11.12, Table 11.12-2, Footnote b). The weighted average moisture content for sand and aggregate is 2.65% ((1.77 \* 213.75 + 4.17 \* 123.75)/337.5). To estimate particulate emissions rates for aggregate handling transfer points (unloading of the feeder, loading and unloading the aggregate bin/weigh batcher), emission factors were obtained from AP-42 Section 11.19.2, Table 11.19.2-2, "Conveyor Transfer Point Controlled". Additional reductions for annual emissions are found in limiting annual production.

To estimate control particulate emission rates for silo loading, cement/fly ash batcher loading operations, and concrete mixer truck loading, emission equations were obtained from EPA's <u>Compilation of Air Pollutant Emission Factors</u>, <u>Volume I: Stationary Point and Area Sources</u>, Fifth Edition, Section 11.12 (06/06), Table 11.12-2 and multiplied by the percent control efficiency of the dust collector baghouse. The dust collector baghouses will control dust to a 99.9 percent efficiency. PM<sub>2.5</sub> emission rate for concrete mixer truck loading emissions were determined using the ratio of controlled truck loading ratio Table 11.12-3 PM10 lb/hr \* PM2.5/PM10 (0.048/0.32). PM<sub>2.5</sub> emission rate for cement/fly ash batcher loading emissions were determined using the ratio of controlled mixer loading ratio Table 11.12-4 PM10 lbs/hr \* PM2.5/PM10 (0.03/0.13). PM<sub>2.5</sub> emission rate for fly ash silo emissions loading were determined using the ratio of controlled mixer loading ratio Table 11.12-4 PM10 lbs/hr \* PM2.5/PM10 (0.03/0.13). PM<sub>2.5</sub> emission rate for fly ash silo emissions loading were determined using the ratio of controlled mixer loading ratio Table 11.12-4 PM10 lbs/hr \* PM2.5/PM10 (0.03/0.13). PM<sub>2.5</sub> emission rate for fly ash silo emissions loading were determined using the ratio of controlled mixer loading ratio Table 11.12-4 PM10 lbs/hr \* PM2.5/PM10 (0.03/0.13). PM<sub>2.5</sub> emission rate for fly ash silo emissions loading were determined using the ratio of controlled mixer loading ratio Table 11.12-4 PM10 lbs/hr \* PM2.5/PM10 (0.03/0.13).

Maximum rated material throughput is 125 cubic yards per hour. Annual emissions in tons per year (tpy) were calculated assuming operation of 500,000 cubic yards per year.

#### Aggregate Handling Emission Equation – Hourly Emissions

$$\begin{split} & E \ (lbs/ton) = k \ x \ 0.0032 \ x \ (U/5)^{1.3} \ / \ (M/2)^{1.4} \\ & E_{PM} \ (lbs/ton) = 0.74 \ x \ 0.0032 \ x \ (11/5)^{1.3} \ / \ (1.77/2)^{1.4} \\ & E_{PM10} \ (lbs/ton) = 0.35 \ x \ 0.0032 \ x \ (11/5)^{1.3} \ / \ (1.77/2)^{1.4} \\ & E_{PM2.5} \ (lbs/ton) = 0.053 \ x \ 0.0032 \ x \ (11/5)^{1.3} \ / \ (1.77/2)^{1.4} \\ & E_{PM} = 0.00783 \ lbs/ton; \ E_{PM10} = 0.00370 \ lbs/ton; \ E_{PM2.5} = 0.00056 \ lbs/ton \end{split}$$

#### Sand Handling Emission Equation – Hourly Emissions

$$\begin{split} &E~(lbs/ton)=k~x~0.0032~x~(U/5)^{1.3}~/~(M/2)^{1.4}\\ &E_{PM}~(lbs/ton)=0.74~x~0.0032~x~(11/5)^{1.3}~/~(4.17/2)^{1.4}\\ &E_{PM10}~(lbs/ton)=0.35~x~0.0032~x~(11/5)^{1.3}~/~(4.17/2)^{1.4}\\ &E_{PM2.5}~(lbs/ton)=0.053~x~0.0032~x~(11/5)^{1.3}~/~(4.17/2)^{1.4}\\ &E_{PM}=0.00236~lbs/ton;~E_{PM10}=0.00112~lbs/ton;~E_{PM2.5}=0.00017~lbs/ton \end{split}$$

#### Aggregate/Sand Handling Emission Equation – Hourly Emissions

$$\begin{split} E \ (lbs/ton) &= k \ x \ 0.0032 \ x \ (U/5)^{1.3} \ / \ (M/2)^{1.4} \\ E_{PM} \ (lbs/ton) &= 0.74 \ x \ 0.0032 \ x \ (11/5)^{1.3} \ / \ (2.65/2)^{1.4} \\ E_{PM10} \ (lbs/ton) &= 0.35 \ x \ 0.0032 \ x \ (11/5)^{1.3} \ / \ (2.65/2)^{1.4} \\ E_{PM2.5} \ (lbs/ton) &= 0.053 \ x \ 0.0032 \ x \ (11/5)^{1.3} \ / \ (2.65/2)^{1.4} \\ E_{PM} &= 0.00445 \ lbs/ton; \ E_{PM10} = 0.00211 \ lbs/ton; \ E_{PM2.5} = 0.00032 \ lbs/ton \end{split}$$

#### Aggregate Handling Emission Equation – Annual Emissions

$$\begin{split} & \text{E (lbs/ton)} = \text{k x } 0.0032 \text{ x } (\text{U/5})^{1.3} / (\text{M/2})^{1.4} \\ & \text{E}_{\text{PM}} (\text{lbs/ton}) = 0.74 \text{ x } 0.0032 \text{ x } (8.3/5)^{1.3} / (1.77/2)^{1.4} \\ & \text{E}_{\text{PM10}} (\text{lbs/ton}) = 0.35 \text{ x } 0.0032 \text{ x } (8.3/5)^{1.3} / (1.77/2)^{1.4} \\ & \text{E}_{\text{PM2.5}} (\text{lbs/ton}) = 0.053 \text{ x } 0.0032 \text{ x } (8.3/5)^{1.3} / (1.77/2)^{1.4} \\ & \text{E}_{\text{PM}} = 0.00543 \text{ lbs/ton}; \text{E}_{\text{PM10}} = 0.00257 \text{ lbs/ton}; \text{E}_{\text{PM2.5}} = 0.00039 \text{ lbs/ton} \\ & \textbf{Sand Handling Emission Equation - Annual Emissions} \\ & \text{E (lbs/ton)} = \text{k x } 0.0032 \text{ x } (\text{U/5})^{1.3} / (\text{M/2})^{1.4} \\ & \text{E}_{\text{PM}} (\text{lbs/ton}) = 0.74 \text{ x } 0.0032 \text{ x } (8.3/5)^{1.3} / (4.17/2)^{1.4} \\ & \text{E}_{\text{PM10}} (\text{lbs/ton}) = 0.35 \text{ x } 0.0032 \text{ x } (8.3/5)^{1.3} / (4.17/2)^{1.4} \\ & \text{E}_{\text{PM2.5}} (\text{lbs/ton}) = 0.053 \text{ x } 0.0032 \text{ x } (8.3/5)^{1.3} / (4.17/2)^{1.4} \\ & \text{E}_{\text{PM2.5}} (\text{lbs/ton}) = 0.053 \text{ x } 0.0032 \text{ x } (8.3/5)^{1.3} / (4.17/2)^{1.4} \\ & \text{E}_{\text{PM}2.5} (\text{lbs/ton}) = 0.0053 \text{ x } 0.0032 \text{ x } (8.3/5)^{1.3} / (4.17/2)^{1.4} \\ & \text{E}_{\text{PM}} = 0.00164 \text{ lbs/ton}; \text{E}_{\text{PM10}} = 0.00077 \text{ lbs/ton}; \text{E}_{\text{PM2.5}} = 0.00012 \text{ lbs/ton} \end{split}$$

#### Aggregate/Sand Handling Emission Equation – Annual Emissions

$$\begin{split} E \ (lbs/ton) &= k \ x \ 0.0032 \ x \ (U/5)^{1.3} \ / \ (M/2)^{1.4} \\ E_{PM} \ (lbs/ton) &= 0.74 \ x \ 0.0032 \ x \ (8.3/5)^{1.3} \ / \ (2.65/2)^{1.4} \\ E_{PM10} \ (lbs/ton) &= 0.35 \ x \ 0.0032 \ x \ (8.3/5)^{1.3} \ / \ (2.65/2)^{1.4} \\ E_{PM2.5} \ (lbs/ton) &= 0.053 \ x \ 0.0032 \ x \ (8.3/5)^{1.3} \ / \ (2.65/2)^{1.4} \\ E_{PM} &= 0.00309 \ lbs/ton; \ E_{PM10} = 0.00146 \ lbs/ton; \ E_{PM2.5} = 0.00022 \ lbs/ton \end{split}$$

#### EPA's AP-42, Section 11.19.2 (08/04), Table 11.19.2-2

 $\frac{\text{Conveyor Transfer Point Controlled}}{\text{E}_{PM} (\text{lbs/ton}) = 0.00014 \text{ lbs/ton}; \text{E}_{PM10} (\text{lbs/ton}) = 0.000046 \text{ lbs/ton}; \text{E}_{PM2.5} (\text{lbs/ton}) = 0.000013 \text{ lbs/ton}}$ 

#### EPA's AP-42, Section 11.12 (06/06), Table 11.12-2

Cement Silo Loading Emission Factor

 $E_{PM} (lbs/ton) = 0.00073 \ lbs/ton; \\ E_{PM10} (lbs/ton) = 0.00047 \ lbs/ton; \\ E_{PM2.5} (lbs/ton) = 0.000108 \ lbs/ton \\ \underline{Fly} \ Ash \ \underline{Silo} \ Loading \ \underline{Emission \ Factor}$ 

 $E_{PM} (lbs/ton) = 0.00314 \ lbs/ton; \\ E_{PM10} (lbs/ton) = 0.00110 \ lbs/ton; \\ E_{PM2.5} (lbs/ton) = 0.0002177 \ lbs/ton \\ \underline{Cement/Fly} \ Ash \ Batcher \ Loading \ Emission \ Factor$ 

 $E_{PM} (lbs/ton) = 0.000572 \ lbs/ton; \\ E_{PM10} (lbs/ton) = 0.000156 \ lbs/ton; \\ E_{PM2.5} (lbs/ton) = 0.0000309 \ lbs/ton \\ \underline{Concrete \ Truck \ Loading \ Emission \ Factor}$ 

 $E_{PM} (lbs/ton) = 0.001118 \ lbs/ton; \\ E_{PM10} (lbs/ton) = 0.00031 \ lbs/ton; \\ E_{PM2.5} (lbs/ton) = 0.0000558 \ lbs/ton$ 

Process Unit	PM Emission Factor (lbs/ton)	PM10 Emission Factor (lbs/ton)	PM2.5 Emission Factor (lbs/ton)
Aggregate Material Handling - Hourly	0.00783	0.00370	0. 00056
Sand Material Handling - Hourly	0.00236	0.00112	0.00017
Aggregate/Sand Material Handling - Hourly	0.00445	0.00211	0.00032
Aggregate Material Handling - Annually	0.00543	0.00257	0. 00039
Sand Material Handling - Annually	0.00164	0.00077	0.00012
Aggregate/Sand Material Handling - Annually	0.00309	0.00146	0.00022
Aggregate Transfer Points	0.00014	0.000046	0.000013
Cement Silo	0.00073	0.00047	0.0000930
Fly Ash Silo	0.00314	0.00110	0.0002177
Cement/Fly Ash Batcher	0.000572	0.000156	0.0000309
Truck Loading	0.001118	0.00031	0.0000558

#### **Controlled Emission Factors: Emission Factors:**

The following equation was used to calculate the hourly emission rate for each material handling emission unit:

Emission Rate (lbs/hour) = Process Rate (tons/hour) \* Controlled Emission Factor (lbs/ton)

The following equation was used to calculate the hourly emission rate for each process unit:

Emission Rate (tons/year) = <u>Controlled Emission Factor (lbs/ton) \* Process Rate (tons/year)</u> 2000 lbs/ton

Process Unit #	Process Unit Description	Process Rate	PM Emission Rate (lbs/hr)	PM Emission Rate (tons/yr)	PM <sub>10</sub> Emission Rate (lbs/hr)	PM <sub>10</sub> Emission Rate (tons/yr)	PM <sub>2.5</sub> Emission Rate (lbs/hr)	PM <sub>2.5</sub> Emission Rate (tons/yr)
2	Aggregate/Sand Feeder Loading	187.5 tph, 750,000 tpy	0.83	1.16	0.39	0.55	0.060	0.083
3	Feed Hopper Conveyor	187.5 tph, 750,000 tpy	0.026	0.053	0.0086	0.017	0.0024	0.0049
4	4-Bin Aggregate Bin	187.5 tph, 750,000 tpy	0.026	0.053	0.0086	0.017	0.0024	0.0049
5,6	Aggregate Weigh Batcher and Conveyor	187.5 tph, 750,000 tpy	0.026	0.053	0.0086	0.017	0.0024	0.0049
7,8	Truck Loading / Cement/Fly Ash Batcher Baghouse	150 cuyd/hr, 500,000 cuyd/yr	0.066	0.13	0.018	0.036	0.0032	0.0060
9	Cement Split Silo Baghouse	150 cuyd/hr, 500,000 cuyd/yr	0.022	0.045	0.014	0.029	0.0033	0.0057
10	Fly Ash Split Silo Baghouse	150 cuyd/hr, 500,000 cuyd/yr	0.026	0.052	0.0091	0.018	0.0021	0.0036
11	Aggregate/Sand Storage Piles	187.5 tph, 750,000 tpy	1.09	1.51	0.52	0.72	0.078	0.11
	r	FOTALS	2.12	3.06	0.98	1.40	0.15	0.22

Table 6-2: Controlled Material Handling Particulate Emission Rates

Haul truck travel emissions were estimated using AP-42, Section 13.2.1 (ver.01/11) "Paved Roads" emission equation. Haul trucks will be used to deliver cement, fly ash, aggregate material, sand material, and transport concrete product. Annual emission rates are reduced by limiting the annual production which limits the number of truck per year.

AP-42 13.1 Paved Road (01/11) Equation:						
$E = k(sL)^{0.91*(W)^{1.02*[1-P/4N]}}$		Annual emis	sions only in	clude p factor		
k PM	0.011					
k PM10	0.0022					
k PM25	0.00054					
sL	0.6	road surface	silt loading	(g/m2) Table 1	3.2.1-2, <	500
P = days with precipitation over 0.01 inches	60	AP-42 Figur	re 13.2.2-1			
N = number of days in averaging period	365	U				
Fly Ash Truck VMT	214	meter/RT	23	tons/load	8.3	tons/hr
Cement Truck VMT	214	meter/RT	23	tons/load	30.6	tons/hr
Aggregate/Sand Truck VMT	392	meter/RT	23	tons/load	187.5	tons/hr
Concrete Truck VMT	214	meter/RT	12	cuyd/load	125	cuyd/hr
Max. Fly Ash Truck/hr	0.4	truck/hr	1434.8	trucks/yr		
Max. Cement Truck/hr	1.3	truck/hr	5315.2	trucks/yr		
Max. Aggregate/Sand Truck/hr	8.2	truck/hr	32608.7	trucks/yr		
Max Concrete Trucks/hr	10.4	truck/hr	41666.7	<u>trucks/yr</u>		
	20.3	truck/hr	81025.4	trucks/yr		
Vehicle Miles Traveled	3.59997	VMT/hr				
	14,399.9	VMT/yr				
Fly Ash, Cement, Aggregate, Sand Truck weight	26	.5 tons	15	-ton truck tare		
Concrete Truck weight		25 tons				
		PM Ur	ncontrolled			
Max. Truck Emissions Paved Road	0.6883	lbs/hr	1.3	200 tons/yr		
		PM10 U	Incontrolled			
	0.1377	lbs/hr	0.2	640 tons/yr		
		PM2.5 U	Uncontrolled			
	0.0338	lbs/hr	0.0	648 tons/yr		

## Estimates for Hot Water Boiler (NOx, CO, SO<sub>2</sub>, VOC and PM)

The hot water boiler keeps the water warm during cold periods. The facility will consist of three (3) instantaneous water heaters, each rated at 199,900 Btu/hr. The combined hot water boiler is approximately 0.6 MMBtu/hr. The hot water boiler will burn natural gas with total sulfur content less than 0.75 gr/100scf and will never burn coal, wood, or any grade of fuel oil. Emission factors for NO<sub>X</sub>, CO, VOC, and PM were obtained from EPA's <u>Compilation of Air Pollutant</u> <u>Emission Factors, Volume I: Stationary Point and Area Sources</u>, Fifth Edition, Section 1.4 (7/98), Table 1.4-1, -2. Based on a boiler Btu rating of 0.6 million and a natural gas lower heat value of 945 Btu/scf, the approximately amount of natural gas burned per hour will be 634.9 scf/hr. Uncontrolled annual emissions were based on 8760 hours per year. Controlled annual emissions were based on 8760 hours per year.

Pollutant	Emission Factor (lbs/10 <sup>6</sup> scf)			
Nitrogen Oxides	100			
Carbon Monoxides	84			
Particulate	7.6			
Hydrocarbons	11			

#### **AP-42 Section 1.4 Emission Factors:**

Emission Rate (lbs/hr) = Emission Factor (lbs/ $10^6$  scf) \* Boiler Rating ( $10^6$  Btu/hr)

#### Mass Balance

Pollutant	Sulfur Content	Fuel Usage
Sulfur Dioxide	0.75 grains/100 scf	634.9 scf/hr

Emission Rate (lbs/hr) = grains/100 scf \* Fuel Usage (100 scf/hr) / 7000 grains/lb \*2 S/SO<sub>2</sub>

The following equation was used to calculate the annual emission rate for each boiler pollutant:

Emission Rate (tons/year) = Emission Rate (lbs/hour) \* Operating Hour (hrs/year) 2000 lbs/ton

Table 6-5: Uncontrolled Combustion Emission Rates						
Emission Unit Number	Pollutant	Thermal Rating (BTU max)	Emission Rate (lbs/hr)	Emission Rate (tons/yr)		
	NO <sub>X</sub>	600,000	0.063	0.28		
12, 13, 14	СО	600,000	0.053	0.23		
	$SO_2$	600,000	0.00068	0.0030		
	VOC	600,000	0.0070	0.031		
	РМ	600,000	0.0048	0.021		

Table 6-3: Uncontrolled Combustion Emission Rates

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#### Table 6-4: Controlled Combustion Emission Rates

Emission Unit Number	Pollutant	Thermal Rating (BTU <sub>max</sub> )	Emission Rate (lbs/hr)	Emission Rate (tons/yr)		
	NO <sub>X</sub>	600,000	0.063	0.28		
	СО	600,000	0.053	0.23		
12, 13, 14	SO <sub>2</sub>	600,000	0.00068	0.0030		
	VOC	600,000	0.0070	0.031		
	РМ	600,000	0.0048	0.021		

Roper Construction, Inc.

тр #	Source Description	NOx		CO		SO2		VOC		PM		PM10		PM2.5	
		lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr
1	Haul Road									0.69	2.89	0.14	0.58	0.034	0.14
2	Feeder Hopper									0.83	3.66	0.39	1.73	0.060	0.26
3	Feed Hopper Conveyor									0.56	2.46	0.21	0.90	0.031	0.14
4	4-Bin Aggregate Bin									0.56	2.46	0.21	0.90	0.031	0.14
5,6	Aggregate Weigh Batcher and Conveyor									0.56	2.46	0.21	0.90	0.031	0.14
7	Truck Loading									43.4	190.1	12.0	52.7	2.16	9.48
8	Cement/Fly Ash Batcher									22.2	97.2	6.05	26.5	1.20	5.25
9	Cement Split Silo									22.3	97.7	14.4	62.9	2.84	12.5
10	Fly Ash Split Silo									25.9	113.5	25.9	113.5	9.08	39.7
11	Aggregate Storage Piles									1.09	4.78	0.52	2.26	0.078	0.34
12,13,14	Concrete Batch Plant Heater	0.063	0.28	0.053	0.23	0.00068	0.0030	0.0070	0.031	0.0048	0.021	0.0048	0.021	0.0048	0.021
	Total	0.063	0.28	0.053	0.23	0.00068	0.0030	0.0070	0.031	118	517	60	263	15.6	68

#### **Table 6-5: PTE Emission Totals**

ID #	Source Description	NOx		СО		SO2		VOC		PM		PM10		PM2.5	
ID π		lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr	lbs/hr	tons/yr
1	Haul Road									0.69	1.32	0.14	0.26	0.034	0.06
2	Feeder Hopper									0.83	1.16	0.39	0.55	0.06	0.083
3	Feed Hopper Conveyor									0.026	0.053	0.0086	0.017	0.0024	0.0049
4	4-Bin Aggregate Bin									0.026	0.053	0.0086	0.017	0.0024	0.0049
5,6	Aggregate Weigh Batcher and Conveyor									0.026	0.053	0.0086	0.017	0.0024	0.0049
7,8	Truck Loading and Cement/Fly Ash Batcher									0.066	0.13	0.018	0.036	0.0032	0.0060
9	Cement Split Silo									0.022	0.045	0.014	0.029	0.0033	0.0057
10	Fly Ash Split Silo									0.026	0.052	0.0091	0.018	0.0021	0.0036
11	Aggregate Storage Piles									1.09	1.51	0.52	0.72	0.078	0.11
12,13,14	Concrete Batch Plant Heater	0.063	0.28	0.053	0.23	0.00068	0.0030	0.0070	0.031	0.0048	0.021	0.0048	0.021	0.0048	0.021
	Total	0.063	0.28	0.053	0.23	0.00068	0.0030	0.0070	0.031	2.81	4.40	1.12	1.68	0.19	0.31

**Table 6-6: PER Emission Totals** 

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#### Table 6-7: HAPs Emission Rates from the Hot Water Heater (Units 12, 13, 14)

Btu Rating Fuel Usage: Btu x 10^-12/hr: Yearly Operating Hours:		0.6 634.9 0.000634921 8760	mmBtu/hr scf/hr mmscf/hr hours per year	(based on 945 Bt	u/scf)	
Type of Fuel: Emission Factors	Natural Gas AP-42 Sectior	n 1.4				
Organic Compounds	CAS#			Emission Factor (lbs/MM scf)	Emission Rate (lbs/hr)	Emission Rate (ton/yr)
Benzene	71-43-2			2.10E-03	0.000001	0.000006
Formaldehyde	50-00-0			7.50E-02	0.000048	0.000209
Hexane	110-54-3			1.80E+00	0.001143	0.005006
Naphthalene	91-20-3			6.10E-04	0.000000	0.000002
Toluene	108-88-3			3.40E-03	0.000002	0.000009
		Total O	rganic Compounds	1.88+00	0.001194	0.005231
HAPS Metals				Emission Factor (lbs/MM scf)	Emission Rate (lbs/hr)	Emission Rate (ton/yr)
Arsenic				2.00E-04	0.000000	0.000001
Beryllium				1.20E-05	0.000000	0.000000
Cadmium				1.10E-03	0.000001	0.000003
Chromium				1.40E-03	0.000001	0.000004
Cobalt				8.40E-05	0.000000	0.000000
Lead				5.00E-04	0.000000	0.000001
Manganese				3.80E-04	0.000000	0.000001
Mercury				2.60E-04	0.000000	0.000001
Nickel				2.10E-03	0.000001	0.000006
Selenium				2.40E-05	0.000000	0.000000
		1	Total Metals HAPS	6.06E-03	0.000004	0.000017
			Total HAPS		0.001198	0.005248

Form-Section 6 last revised: 5/3/16

## **Section 6.a**

## **Green House Gas Emissions**

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

**Title V (20.2.70 NMAC), Minor NSR (20.2.72 NMAC), and PSD (20.2.74 NMAC)** applicants must estimate and report greenhouse gas (GHG) emissions to verify the emission rates reported in the public notice, determine applicability to 40 CFR 60 Subparts, and to evaluate Prevention of Significant Deterioration (PSD) applicability. GHG emissions that are subject to air permit regulations consist of the sum of an aggregate group of these six greenhouse gases: carbon dioxide (CO<sub>2</sub>), nitrous oxide (N<sub>2</sub>O), methane (CH<sub>4</sub>), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>).

#### **Calculating GHG Emissions:**

1. Calculate the ton per year (tpy) GHG mass emissions and GHG CO<sub>2</sub>e emissions from your facility.

**2.** GHG mass emissions are the sum of the total annual tons of greenhouse gases without adjusting with the global warming potentials (GWPs). GHG CO<sub>2</sub>e emissions are the sum of the mass emissions of each individual GHG multiplied by its GWP found in Table A-1 in 40 CFR 98 <u>Mandatory Greenhouse Gas Reporting</u>.

3. Emissions from routine or predictable start up, shut down, and maintenance must be included.

**4.** Report GHG mass and GHG CO<sub>2</sub>e emissions in Table 2-P of this application. Emissions are reported in <u>short</u> tons per year and represent each emission unit's Potential to Emit (PTE).

**5.** All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO2e emissions for each unit in Table 2-P.

**6.** For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following X By checking this box, the applicant acknowledges the total CO2e emissions are less than 75,000 tons per year.

#### Sources for Calculating GHG Emissions:

- Manufacturer's Data
- AP-42 Compilation of Air Pollutant Emission Factors at http://www.epa.gov/ttn/chief/ap42/index.html
- EPA's Internet emission factor database WebFIRE at http://cfpub.epa.gov/webfire/

• 40 CFR 98 <u>Mandatory Green House Gas Reporting</u> except that tons should be reported in short tons rather than in metric tons for the purpose of PSD applicability.

• API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry. August 2009 or most recent version.

• Sources listed on EPA's NSR Resources for Estimating GHG Emissions at http://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases:

#### **Global Warming Potentials (GWP):**

Applicants must use the Global Warming Potentials codified in Table A-1 of the most recent version of 40 CFR 98 Mandatory Greenhouse Gas Reporting. The GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to that of one unit mass of  $CO_2$  over a specified time period.

"Greenhouse gas" for the purpose of air permit regulations is defined as the aggregate group of the following six gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. (20.2.70.7 NMAC, 20.2.74.7 NMAC). You may also find GHGs defined in 40 CFR 86.1818-12(a).

#### Metric to Short Ton Conversion:

Short tons for GHGs and other regulated pollutants are the standard unit of measure for PSD and title V permitting programs. 40 CFR 98 <u>Mandatory Greenhouse Reporting</u> requires metric tons.

1 metric ton = 1.10231 short tons (per Table A-2 to Subpart A of Part 98 – Units of Measure Conversions)