

Data Base Summary (Statement of Basis)

NSR Permit

Type of Permit Action: Regular-New

PSD or Not	Minor or Title V	Portable or Not
Minor (not PSD)	Synthetic Minor	Stationary

Facility: Alto Concrete Batch Plant
Company: Roper Construction Inc.
Facility Type: CON-Concrete Batch Plant
Permit No. (NSR) 9295
Operating Permit No. (TV) N/A
Agency Interest No. 40076 - PRN20210001
AIRS ID No. 350270299
SIC CODE: 3273
Permit Writer: Deepika Saikrishnan/Rhonda Romero

Application Notarized Date: June 14, 2021
Receive Date: June 22, 2021
Timeliness of TV Application: N/A
Ruled Incomplete: N/A
Ruled Complete: July 22, 2021
Public involvement Plan (PIP): TBD
PSD APP. Sent to EPA: NR
Public Notice Date & Newspaper: July 28, 2021, Ruidoso News
Comments Due: August 27, 2021
Analysis Review Begins: September 21, 2021
Analysis Review Ends: October 21, 2021
Public Hearing: February 9, 2021 and October 18, 2022(EIB)
Proposed Permit to EPA Acknowledged: N/A
Permit Due: October 20, 2021 extension was granted because of hearing
Permit Issued: TBD
PSD Permit to EPA: NR

Facility Location: 135 NM Highway 220, Alto, NM 88312
UTM Zone: 13 **Datum:** NAD83
UTM Easting: 438240 meters
UTM Northing: N3697950meters
Elevation: 7240 ft
County: Lincoln
In a Sensitive Area: No

Contact Name: Ryan Roper
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Contact Address: PO Box 969
Alto, NM 88312

Consultant Name: Paul Wade
Montrose Air Quality Services, LLC
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Email: pwade@montrose-env.com

Consultant Address: 3500 Comanche Rd NE, Suite G
Albuquerque, NM 87107

NSR Agency* Notification:

Affected Program	Distance	Units	Date Letter Sent
Class I - White Mountain Wilderness	1.9	km	7/22/2021
EPA Region 6, Erika Ledoux and Mary Layton	NA	NA	7/22/2021

*As required by 20.2.72.206.A.(7): Mail a copy of the public notice at the same time it is sent for publication to the appropriate agency in the following locations if the source will locate within 50 kilometers (31.1 miles) of the boundary of other states, Bernalillo County, or a Class I Area.

Part II – Facility Specifications

Table 102.A: Total Potential Emission Rate (PER) from Entire Facility

Pollutant	Emissions (tons per year)
Nitrogen Oxides (NO _x)	0.3
Carbon Monoxide (CO)	0.2
Volatile Organic Compounds (VOC)	0.03
Sulfur Dioxide (SO ₂)	0.003
Particulate Matter 10 microns or less (PM ₁₀)	0.2
Particulate Matter 2.5 microns or less (PM _{2.5})	0.05

Note: Total Potential Pollutant Emissions in Table 102.A, may include fugitive emissions; routine or predictable, startup, shutdown, and maintenance emissions (SSM); and permitted malfunction allowances if these are a sources of regulated air pollutants from this facility.

Table 102.B: Total Potential Emissions Rate (PER) for Hazardous Air Pollutants (HAPs) that exceed 1.0 ton per year

Pollutant	Emissions (tons per year)
Total HAPs	<1.0

* HAP emissions are included in the Table 102.A VOC emissions total.

** Total HAP emissions may not agree with the sum of individual HAPs because only individual HAPs emitted at a rate greater than 1.0 ton per year are listed in Table 102.B.

Air Pollution Control Devices:

Control Equipment List:			
Control Equipment Unit No.	Control Description	Pollutant being controlled	Control for Unit Number(s)¹
<u>3b</u>	<u>Wet Dust Suppression System</u>	<u>PM₁₀, PM_{2.5}</u>	<u>3</u>
<u>4b</u>	<u>Wet Dust Suppression System</u>	<u>PM₁₀, PM_{2.5}</u>	<u>4</u>
<u>5b</u>	<u>Wet Dust Suppression System</u>	<u>PM₁₀, PM_{2.5}</u>	<u>5</u>
<u>6b</u>	<u>Wet Dust Suppression System</u>	<u>PM₁₀, PM_{2.5}</u>	<u>6</u>
<u>7b</u>	<u>Baghouse</u>	<u>PM₁₀, PM_{2.5}</u>	<u>7, 8</u>
<u>9b</u>	<u>Baghouse</u>	<u>PM₁₀, PM_{2.5}</u>	<u>9</u>
<u>10b</u>	<u>Baghouse</u>	<u>PM₁₀, PM_{2.5}</u>	<u>10</u>
<u>1b</u>	<u>Paved and Swept</u>	<u>PM₁₀, PM_{2.5}</u>	<u>1</u>

Equipment Specifications:

Unit No.	Source Description	Make	Model	Serial No.	Construction/ Reconstruction Date	Manufacture Date	Permitted Capacity
1	Haul Road	NA	NA	NA	NA	NA	127 trips per day
2	Feeder Hopper	JEL Manufacturing	TBD	TBD	TBD	TBD	187.5 tph
3	Feeder Hopper Conveyor	JEL Manufacturing	TBD	TBD	TBD	TBD	187.5 tph
4	Overhead Aggregate Bins (4)	JEL Manufacturing	TBD	TBD	TBD	TBD	187.5 tph
5	Aggregate Weigh Batcher	JEL Manufacturing	TBD	TBD	TBD	TBD	187.5 tph
6	Aggregate Weigh Conveyor	JEL Manufacturing	TBD	TBD	TBD	TBD	187.5 tph
7	Truck Loading with Baghouse	JEL Manufacturing	TBD	TBD	TBD	TBD	125 yd ³ per hour

Equipment Specifications:

Unit No.	Source Description	Make	Model	Serial No.	Construction/ Reconstruction Date	Manufacture Date	Permitted Capacity
8	Cement/Fly Ash weigh Batcher	JEL Manufacturing	TBD	TBD	TBD	TBD	38.8 tph
9	Cement Split Silo	JEL Manufacturing	TBD	TBD	TBD	TBD	30.6 tph
10	Fly Ash Split Silo	JEL Manufacturing	TBD	TBD	TBD	TBD	8.25 tph
11	Aggregate/Sand Storage Piles	NA	NA	NA	NA	NA	187.5 tph
12,13, 14	Concrete Batch Plant Heaters (3 in total)	TBD	TBD	TBD	TBD	TBD	0.6 MMBtu/hr (total)

Emissions: Pollutant Permitted (Allowable and SSM) Emissions per piece of equipment or Subject Item as represented by applicant.

Unit No.	NO _x ¹ pph	NO _x ¹ tpy	CO pph	CO tpy	VOC pph	VOC tpy	SO ₂ pph	SO ₂ tpy	PM ₁₀ pph	PM ₁₀ tpy	PM _{2.5} pph	PM _{2.5} tpy
1	-	-	-	-	-	-	-	-	0.4	0.06	0.04	0.006
2	-	-	-	-	-	-	-	-	0.4	0.06	0.06	0.008
3	-	-	-	-	-	-	-	-	0.009	0.002	0.002	.0005
4	-	-	-	-	-	-	-	-	0.009	0.002	0.002	0.0005
5	-	-	-	-	-	-	-	-	0.009	0.002	0.002	0.0005
6	-	-	-	-	-	-	-	-	0.009	0.002	0.002	0.0005
7	-	-	-	-	-	-	-	-	0.02	0.004	0.003	0.0006
8	-	-	-	-	-	-	-	-	0.02	0.004	0.003	0.0006

Unit No.	NO _x ¹ pph	NO _x ¹ tpy	CO pph	CO tpy	VOC pph	VOC tpy	SO ₂ pph	SO ₂ tpy	PM ₁₀ pph	PM ₁₀ tpy	PM _{2.5} pph	PM _{2.5} tpy
9	-	-	-	-	-	-	-	-	0.01	0.003	0.003	0.0006
10	-	-	-	-	-	-	-	-	0.009	0.002	0.002	0.0004
11	-	-	-	-	-	-	-	-	0.5	0.07	0.08	0.01
12	0.06	0.3	0.05	0.2	0.007	0.03	0.0007	0.003	0.005	0.02	0.005	0.02
13												
14												

- 1 Nitrogen dioxide emissions include all oxides of nitrogen expressed as NO₂
“-” indicates the application represented emissions of this pollutant are not expected.
- 2 To report excess emissions for sources with no pound per hour and/or ton per year emission limits, see condition B110F.