Air Dispersion Modeling Summary for Permit No. 9295 (revised)

Report Date: 10/6/2022
NMED/AQB Modeler: Eric Peters

Facility Identification:
Project: Alto Concrete Batch Plant Company: Roper Construction, Inc.
Permit number: 9295 TEMPO ID: 40076

Location Information:
The facility is located 5.1 miles north of Ruidoso, in Lincoln County. The facility is located 7.2 miles north-northwest of Ruidoso Downs.
UTM Coordinates: 438,240 m East, 3,697,950 m North, zone 13, Datum: NAD83
Elevation = 7240 feet
Air Quality Control Region (AQCR): 153
Airshed: Pr

Project Description:
Brief: Roper Construction, Inc. has applied to the New Mexico Air Quality Bureau for a New Source Review air quality permit for the construction of the Alto Concrete Batch Plant (the facility). The facility is a new concrete batch plant.

The following types of emission sources are included in the project: Aggregate Bin Loading (Unit 4), Aggregate Haul Trucks, Aggregate Weigh Batcher and Conveyor (Unit 5,6), Concrete Batch Plant Heater (Unit 12), Concrete Cement Fly Ash Haul Trucks, Concrete Plant Cement Silo Baghouse (Unit 9), Concrete Plant Fly Ash Baghouse (Unit 10), Concrete Plant Truck Load Baghouse (Unit 7,8), Feed Hopper Loading (Unit 2), Feed Hopper Unloading to Conveyor (Unit 3), Storage Piles (Aggregate) (Unit 11), and Storage Piles (Sand) (Unit 11). The emission units used in the modeling are described in the tables below.

For this permit, modeling was required for the following pollutants: Carbon Monoxide (CO), Nitrogen Dioxide (NO_2), Particulate Matter 10 micrometers or less in aerodynamic diameter (PM10), Particulate Matter (2.5 microns or less) (PM2.5), and Sulfur Dioxide (SO_2).

Table 1: Table of Total Facility Emissions

NO_2 Rate (lbs/hr)	CO Rate (lbs/hr)	SO_2 Rate (lbs/hr)	PM10 Rate (lbs/hr)	PM2.5 Rate (lbs/hr)
0.063	0.053	0.001	0.982	0.144

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Table 2: Table of PointHor Sources

Stack Number	Description	Stack Height (ft)	Diameter (ft)	Velocity (ft/s)	Temperature (°F)	PM10 Rate (lbs/hr)	PM2.5 Rate (lbs/hr)
TMBH	Concrete Plant Truck Load Baghouse (Unit 7,8)	20.0	1.2	66.3	-460	0.018	0.003
CSBH	Concrete Plant Cement Silo Baghouse (Unit 9)	71.0	0.4	36.5	-460	0.014	0.003
FASBH	Concrete Plant Fly Ash Baghouse (Unit 10)	71.0	0.4	36.5	-460	0.009	0.002

Table 3: Table of PointCap Sources

Stack Number	Description	Stack Height (ft)	Diameter (ft)	Velocity (ft/s)	Temperature (°F)	NO_2 Rate (lbs/hr)	CO Rate (lbs/hr)	SO_2 Rate (lbs/hr)	PM10 Rate (lbs/hr)	PM2.5 Rate (lbs/hr)
CBPH	Concrete Batch Plant Heater (Unit 12)	14.0	1.5	9.4	90	0.063	0.053	0.001	0.005	0.005

Table 4: Table of Volume Sources

Source ID	Description	Release Height (ft)	Horizontal Dimension (ft)	Vertical Dimension (ft)	PM10 Rate (lbs/hr)	PM2.5 Rate (lbs/hr)
AB	Aggregate Bin Loading (Unit 4)	13.1	3.8	7.6	0.009	0.002
AGG_0001	Aggregate Haul Trucks	11.2	19.8	10.4	0.157	0.016
WH	Aggregate Weigh Batcher and Conveyor (Unit 5,6)	6.6	3.8	7.6	0.009	0.002
CON_0001	Concrete Cement Fly Ash Haul Trucks	11.2	19.8	10.4	0.120	0.012
FH	Feed Hopper Loading (Unit 2)	19.7	3.8	7.6	0.274	0.041
TP	Feed Hopper Unloading to Conveyor (Unit 3)	6.6	1.5	3.1	0.009	0.002
SP1	Storage Piles (Aggregate) (Unit 11)	8.0	11.6	7.4	0.179	0.027
SP4	Storage Piles (Sand) (Unit 11)	8.0	11.6	7.4	0.179	0.027

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Modeling Assumptions:

The facility operates from 5AM to 7PM with seasonal operation limited to the scenarios described in Table 5. When the facility operates at maximum production rate, the daily production limit will be reached in 6 hours. When the facility operates at lower production rates, it will take more time to produce the daily maximum concrete volume. 6-hour blocks of time are modeled to capture the maximum potential concentrations by grouping similar meteorological conditions together. For example, the early morning hours are expected to produce the highest concentrations because the wind and dispersion tend to be lowest at that time.

Table 5: Table of Operating Scenarios

Model Scenario	Time Segments 10-Hour Blocks November - February	Time Segments 12-Hour Blocks March & October	Time Segments 14-Hour Blocks April - September
1	7 AM to 1 PM	6 AM to 12 PM	5 AM to 11 AM
2	9 AM to 3 PM	8 AM to 2 PM	7 AM to 1 PM
3	11 AM to 5 PM	10 AM to 4 PM	9 AM to 3 PM
4	11 AM to 5 PM	12 PM to 6 PM	11 AM to 5 PM
5	11 AM to 5 PM	12 PM to 6 PM	1 PM to 7 PM
Permit limit	7 AM to 5 PM	6 AM to 6 PM	5 AM to 7 PM

Permit Conditions:

Permit conditions are required to limit the seasonal operations to maximum daily production, which is 750 cubic yards per day (year-round). In addition, earliest start time and latest end time by month are required conditions and are described in the Permit limit row in Table 5, above.

Conclusion:

This modeling analysis demonstrates that operation of the facility described in this report neither causes nor contributes to any exceedances of applicable air quality standards. The standards relevant at this facility are NAAQS for CO, NO_2, PM10, PM2.5, and SO_2; NMAAQS for CO, NO_2, and SO_2; and Class I and Class II PSD increments for NO_2, and PM10.

Action: The permit can be issued based on this modeling analysis.

Modeling report submitted by Montrose Air Quality Services (dated 6/22/2021)
Modeling was last revised on 9/23/2022.
The air quality analysis demonstrates compliance with applicable regulatory requirements.

Model(s) Used: AERMOD version 21112 was used to run the modeling analysis.

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Note: Complete modeling input and output files can be made available and are located in the Modeling Archives in the folder, "9295_Roper Construction, Inc._Alto Concrete Batch Plant".

Modeling Parameters:
The AERMOD regulatory default parameters were included in assumptions made by the model.

Building downwash produced by buildings at the facility was considered. The following buildings were included in the modeling.

Table 6: Table of Buildings

Building Name	Height (m)	Diagonal Length (m)
Office	3.7	31.4
Silo	21.0	4.6

Complex Terrain Data:
Both simple and complex types of terrain were used to model the facility. Elevations of receptors, facility sources, and surrounding sources were obtained from USGS data.
Flat terrain was used for fugitive sources and elevated terrain was used for other sources.

Receptor Grid: The following grids were used to determine the maximum concentration for each pollutant.

Table 7: Table of Receptors

Grid Type	Description	Shape	Spacing	Radius
Cartesian	Intermediate	Round	250 meters	3 kilometers
Cartesian	Fine	Round	100 meters	1 kilometers
Cartesian	Very fine	Round	50 meters	0.5 kilometers
Fence line	Very, very fine	Fence line	25 meters	Fence line

Receptors outside of the radii of impact were discarded for the surrounding source runs.

Meteorological Data: AERMOD – Holloman Air Force Base 2016-2020. Additional modeling was performed with Sierra Blanca Regional Airport years 2017 and 2020.

Adjacent Sources:
The Division 's Modeling Guidance was used to select 30 sources within 50 km of the facility. The facility is 5.4 km from Roper Construction - Rio Bonita Aggregate. The facility is 10.9 km from Concrete Batch Plant-Ruidoso, GCP5-4858. The facility is 17.2 km from HMA GCP3-5109. The facility is 63.8 km from Corona Compressor Station. The facility is 77.6 km from Lincoln Compressor Station. The facility is 107.0 km from Roswell Compressor Station No9.

PSD Increment Information:
The facility is a minor source (for PSD purposes) located in AQCR 153. The minor source baseline dates here are 8/2/1995 for NO_2, not yet established for SO_2, 6/16/2000 for PM10, and not yet established for PM2.5.
The facility is 1.9 km from the Class I area White Mountain Wilderness Area. Class I area modeling is required.

Results Discussion (Holloman AFB data):
The following results are from the review using the Holloman AFB meteorological data. Sierra Blanca Regional Airport data results are presented in the subsequent section.

NO_2 Analysis:
ARM2 was used with default options (0.5 minimum ratio, 0.9 maximum ratio) to determine the conversion of NO_X to NO_2.
Compliance with 1-hour NO_2 NAAQS automatically demonstrates compliance with air quality standards of other periods. The maximum total 1-hour NO_2 concentration was 88.044 $\mu g/m^3$, which occurred 81 m west from the center of the facility. This was 46.8% of the NAAQS. A background concentration of 38.700 $\mu g/m^3$ was added from the monitor 5ZR, at 2811 Holland Street, Carlsbad, NM. The maximum source alone 1-hour NO_2 concentration was 49.344 $\mu g/m^3$, which occurred 81 m west from the center of the facility. This was 26.2% of the NAAQS.

The annual NO_2 concentration was below the significance level. No cumulative analysis is required. The maximum source alone annual NO_2 concentration was 0.962 $\mu g/m^3$, which occurred 87 m north-northwest from the center of the facility. This was 1.0% of the NMAAQS.

The annual NO_2 concentration in Class I areas was below the Class I significance level. No cumulative analysis is required. The maximum source alone annual NO_2 concentration was 0.001 $\mu g/m^3$, which occurred 1911 m west from the center of the facility. This was 0.0% of the PSD Class I increment.

The annual NO_2 concentration was below the significance level. No cumulative analysis is required. The maximum source alone annual NO_2 concentration was 0.962 $\mu g/m^3$, which occurred 87 m north-northwest from the center of the facility. This was 3.8% of the PSD Class II increment.

PM10 Analysis:
The maximum total 24-hour PM10 concentration was 111.270 $\mu g/m^3$, which occurred 87 m north-northwest from the center of the facility. This was 74.2% of the NAAQS. A background concentration of 83.300 $\mu g/m^3$ was added from the monitor 6WM, at Las Cruces-West Mesa Well #46. The maximum source alone 24-hour PM10 concentration was 31.606 $\mu g/m^3$, which occurred 85 m north-northwest from the center of the facility. This was 21.1% of the NAAQS. The maximum total 24-hour PM10 concentration was 29.262 $\mu g/m^3$, which occurred 88 m

north-northwest from the center of the facility. This was 97.5% of the PSD Class II increment.

The 24-hour PM10 concentration in Class I areas was below the in Class I significance level. No cumulative analysis is required. The maximum source alone 24-hour PM10 concentration was 0.269 µg/m^3, which occurred 1911 m west from the center of the facility. This was 3.4% of the PSD Class I increment.

The annual PM10 concentration in Class I areas was below the in Class I significance level. No cumulative analysis is required. The maximum source alone annual PM10 concentration was 0.005 µg/m^3, which occurred 1911 m west from the center of the facility. This was 0.1% of the PSD Class I increment.

The maximum total annual PM10 concentration was 8.539 µg/m^3, which occurred 83 m north from the center of the facility. This was 50.2% of the PSD Class II increment. The maximum source alone annual PM10 concentration was 8.536 µg/m^3, which occurred 83 m north from the center of the facility. This was 50.2% of the PSD Class II increment.

PM2.5 Analysis:
The maximum total 24-hour PM2.5 concentration was 19.157 µg/m^3, which occurred 87 m north-northwest from the center of the facility. This was 54.7% of the NAAQS. A background concentration of 14.900 µg/m^3 was added from the monitor 6Q, at Las Cruces-Environ Dept-1170 N. Solano. The maximum source alone 24-hour PM2.5 concentration was 4.922 µg/m^3, which occurred 85 m north-northwest from the center of the facility. This was 14.1% of the NAAQS.

The maximum total annual PM2.5 concentration was 6.469 µg/m^3, which occurred 83 m north from the center of the facility. This was 53.9% of the NAAQS. A background concentration of 5.100 µg/m^3 was added from the monitor 6Q, at Las Cruces-Environ Dept-1170 N. Solano. The maximum source alone annual PM2.5 concentration was 1.339 µg/m^3, which occurred 83 m north from the center of the facility. This was 11.2% of the NAAQS.

SO_2 Analysis:
Compliance with 1-hour SO_2 NAAQS automatically demonstrates compliance with air quality standards of other periods. The 1-hour SO_2 concentration was below the significance level. No cumulative analysis is required. The maximum source alone 1-hour SO_2 concentration was 0.528 µg/m^3, which occurred 81 m west from the center of the facility. This was 0.3% of the NAAQS.

The 3-hour SO_2 concentration was below the significance level. No cumulative analysis is required. The maximum source alone 3-hour SO_2 concentration was 0.203 µg/m^3, which occurred 85 m east from the center of the facility. This was 0.0% of the NAAQS.

The 24-hour SO_2 concentration was below the significance level. No cumulative analysis is

required. The maximum source alone 24-hour SO_2 concentration was 0.047 µg/m^3, which occurred 66 m south from the center of the facility. This was 0.0% of the NMAAQS.

The annual SO_2 concentration was below the significance level. No cumulative analysis is required. The maximum source alone annual SO_2 concentration was 0.010 µg/m^3, which occurred 87 m north-northwest from the center of the facility. This was 0.0% of the NMAAQS.

Results Discussion (Sierra Blanca Regional Airport data):
The following results are from the review using the Sierra Blanca Regional Airport meteorological data.

CO Analysis:
The 1-hour CO concentration was below the significance level. No cumulative analysis is required. The maximum source alone 1-hour CO concentration was 17.517 µg/m^3, which occurred 71 m south-southwest from the center of the facility. This was 0.1% of the NMAAQS.

The 8-hour CO concentration was below the significance level. No cumulative analysis is required. The maximum source alone 8-hour CO concentration was 5.641 µg/m^3, which occurred 76 m south-southeast from the center of the facility. This was 0.1% of the NMAAQS.

NO_2 Analysis:
ARM2 was used with default options (0.5 minimum ratio, 0.9 maximum ratio) to determine the conversion of NO_X to NO_2.
Compliance with 1-hour NO_2 NAAQS automatically demonstrates compliance with air quality standards of other periods. The maximum total 1-hour NO_2 concentration was 59.554 µg/m^3, which occurred 71 m south-southwest from the center of the facility. This was 31.7% of the NAAQS. A background concentration of 38.700 µg/m^3 was added from the monitor 5ZR, at 2811 Holland Street, Carlsbad, NM. The maximum source alone 1-hour NO_2 concentration was 20.854 µg/m^3, which occurred 72 m south-southwest from the center of the facility. This was 11.1% of the NAAQS.

NO_2 24-hour NMAAQS results are missing.
The annual NO_2 concentration was below the significance level. No cumulative analysis is required. The maximum source alone annual NO_2 concentration was 0.670 µg/m^3, which occurred 83 m east from the center of the facility. This was 0.7% of the NMAAQS.

The annual NO_2 concentration was below the significance level. No cumulative analysis is required. The maximum source alone annual NO_2 concentration was 0.000 µg/m^3, which occurred 1911 m west from the center of the facility. This was 0.0% of the PSD Class I increment.

The annual NO_2 concentration was below the significance level. No cumulative analysis is required. The maximum source alone annual NO_2 concentration was 0.670 µg/m^3, which

occurred 83 m east from the center of the facility. This was 2.7% of the PSD Class II increment.

PM10 Analysis:
The maximum total 24-hour PM10 concentration was 105.978 µg/m^3, which occurred 87 m north-northwest from the center of the facility. This was 70.7% of the NAAQS. A background concentration of 83.300 µg/m^3 was added from the monitor 6WM, at Las Cruces-West Mesa Well #46. The maximum source alone 24-hour PM10 concentration was 22.666 µg/m^3, which occurred 87 m north-northwest from the center of the facility. This was 15.1% of the NAAQS.

The 24-hour PM10 concentration was below the significance level. No cumulative analysis is required. The maximum source alone 24-hour PM10 concentration was 0.057 µg/m^3, which occurred 1911 m west from the center of the facility. This was 0.7% of the PSD Class I increment.

The annual PM10 concentration was below the significance level. No cumulative analysis is required. The maximum source alone annual PM10 concentration was 0.002 µg/m^3, which occurred 1911 m west from the center of the facility. This was 0.0% of the PSD Class I increment.

The maximum total 24-hour PM10 concentration was 22.626 µg/m^3, which occurred 88 m north-northwest from the center of the facility. This was 75.4% of the PSD Class II increment.

The maximum total annual PM10 concentration was 5.623 µg/m^3, which occurred 83 m north from the center of the facility. This was 33.1% of the PSD Class II increment. The maximum source alone annual PM10 concentration was 5.621 µg/m^3, which occurred 83 m north from the center of the facility. This was 33.1% of the PSD Class II increment.

PM2.5 Analysis:
The maximum total 24-hour PM2.5 concentration was 17.838 µg/m^3, which occurred 87 m north-northwest from the center of the facility. This was 51.0% of the NAAQS. A background concentration of 14.900 µg/m^3 was added from the monitor 6Q, at Las Cruces-Environ Dept-1170 N. Solano. The maximum source alone 24-hour PM2.5 concentration was 3.586 µg/m^3, which occurred 87 m north-northwest from the center of the facility. This was 10.2% of the NAAQS.

The maximum total annual PM2.5 concentration was 5.987 µg/m^3, which occurred 83 m north from the center of the facility. This was 49.9% of the NAAQS. A background concentration of 5.100 µg/m^3 was added from the monitor 6Q, at Las Cruces-Environ Dept-1170 N. Solano. The maximum source alone annual PM2.5 concentration was 0.874 µg/m^3, which occurred 83 m north from the center of the facility. This was 7.3% of the NAAQS.

SO_2 Analysis:
Compliance with 1-hour SO_2 NAAQS automatically demonstrates compliance with air quality standards of other periods. The 1-hour SO_2 concentration was below the significance level. No cumulative analysis is required. The maximum source alone 1-hour SO_2 concentration was 0.223 µg/m^3, which occurred 71 m south-southwest from the center of the facility. This was 0.1% of the NAAQS.

The 3-hour SO_2 concentration was below the significance level. No cumulative analysis is required. The maximum source alone 3-hour SO_2 concentration was 0.102 µg/m^3, which occurred 64 m south-southwest from the center of the facility. This was 0.0% of the NAAQS.

The 24-hour SO_2 concentration was below the significance level. No cumulative analysis is required. The maximum source alone 24-hour SO_2 concentration was 0.031 µg/m^3, which occurred 98 m north-northwest from the center of the facility. This was 0.0% of the NMAAQS.

The annual SO_2 concentration was below the significance level. No cumulative analysis is required. The maximum source alone annual SO_2 concentration was 0.007 µg/m^3, which occurred 83 m east from the center of the facility. This was 0.0% of the NMAAQS.

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Table 8: Table of Ambient Impact from Emissions (Holloman AFB meteorological data)

Pollutant	Period	Modeled Facility Concentration ($\mu g/m^3$)	Modeled Concentration with Surrounding Sources ($\mu g/m^3$)	Background Concentration ($\mu g/m^3$)	Cumulative Concentration ($\mu g/m^3$)	Standard	Value of Standard ($\mu g/m^3$)	Percent of Standard	UTM East (m)	UTM North (m)	Elevation (ft)
CO	1-hour	41.448	41.448		41.448	NMAAQS	14997.5	0.3	438,160.0	3,697,962.0	7249
CO	8-hour	8.689	8.689		8.689	NMAAQS	9960.1	0.1	438,150.0	3,697,950.0	7249
NO_2	1-hour	49.344	49.344	38.700	88.044	NAAQS	188.03	46.8	438,160.0	3,697,962.0	7249
NO_2	annual	0.962	0.962		0.962	NMAAQS	94.02	1.0	438,210.0	3,698,032.0	7250
NO_2	annual	0.001	0.001		0.001	PSD Class I	2.5	0.0	436,333.0	3,698,075.0	7418
NO_2	annual	0.962	0.962		0.962	PSD Class II	25	3.8	438,210.0	3,698,032.0	7250
PM10	24-hour	31.606	27.970	83.300	111.270	NAAQS	150	74.2	438,210.0	3,698,032.0	7250
PM10	24-hour	0.269	0.269		0.269	PSD Class I	8	3.4	436,333.0	3,698,075.0	7418
PM10	annual	0.005	0.005		0.005	PSD Class I	4	0.1	436,333.0	3,698,075.0	7418
PM10	24-hour		29.262		29.262	PSD Class II	30	97.5	438,210.0	3,698,032.0	7250
PM10	annual	8.536	8.539		8.539	PSD Class II	17	50.2	438,232.0	3,698,033.0	7247
PM2.5	24-hour	4.922	4.257	14.900	19.157	NAAQS	35	54.7	438,210.0	3,698,032.0	7250
PM2.5	annual	1.339	1.369	5.100	6.469	NAAQS	12	53.9	438,232.0	3,698,033.0	7247
SO_2	1-hour	0.528	0.528		0.528	NAAQS	196.4	0.3	438,160.0	3,697,962.0	7249
SO_2	3-hour	0.203	0.203		0.203	NAAQS	1309.3	0.0	438,325.0	3,697,950.0	7229
SO_2	24-hour	0.047	0.047		0.047	NMAAQS	261.9	0.0	438,252.0	3,697,885.0	7248
SO_2	annual	0.010	0.010		0.010	NMAAQS	52.4	0.0	438,210.0	3,698,032.0	7250

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Table 9: Table of Ambient Impact from Emissions (Sierra Blanca Regional Airport meteorological data)

Pollutant	Period	Modeled Facility Concentration ($\mu g/m^3$)	Modeled Concentration with Surrounding Sources ($\mu g/m^3$)	Background Concentration ($\mu g/m^3$)	Cumulative Concentration ($\mu g/m^3$)	Standard	Value of Standard ($\mu g/m^3$)	Percent of Standard	UTM East (m)	UTM North (m)	Elevation (ft)
CO	1-hour	17.517	17.517		17.517	NMAAQS	14997.5	0.1	438,203.0	3,697,889.0	7252
CO	8-hour	5.641	5.641		5.641	NMAAQS	9960.1	0.1	438,276.0	3,697,883.0	7246
NO_2	1-hour	20.854	20.854	38.700	59.554	NAAQS	188.03	31.7	438,203.0	3,697,889.0	7252
NO_2	annual	0.670	0.670		0.670	NMAAQS	94.02	0.7	438,323.0	3,697,947.0	7229
NO_2	annual	0.000	0.000		0.000	PSD Class I	2.5	0.0	436,333.0	3,698,075.0	7418
NO_2	annual	0.670	0.670		0.670	PSD Class II	25	2.7	438,323.0	3,697,947.0	7229
PM10	24-hour	22.666	22.678	83.300	105.978	NAAQS	150	70.7	438,210.0	3,698,032.0	7250
PM10	24-hour	0.057	0.057		0.057	PSD Class I	8	0.7	436,333.0	3,698,075.0	7418
PM10	annual	0.002	0.002		0.002	PSD Class I	4	0.0	436,333.0	3,698,075.0	7418
PM10	24-hour		22.626		22.626	PSD Class II	30	75.4	438,210.0	3,698,032.0	7250
PM10	annual	5.621	5.623		5.623	PSD Class II	17	33.1	438,232.0	3,698,033.0	7247
PM2.5	24-hour	3.586	2.938	14.900	17.838	NAAQS	35	51.0	438,210.0	3,698,032.0	7250
PM2.5	annual	0.874	0.887	5.100	5.987	NAAQS	12	49.9	438,232.0	3,698,033.0	7247
SO_2	1-hour	0.223	0.223		0.223	NAAQS	196.4	0.1	438,203.0	3,697,889.0	7252
SO_2	3-hour	0.102	0.102		0.102	NAAQS	1309.3	0.0	438,227.0	3,697,887.0	7249
SO_2	24-hour	0.031	0.031		0.031	NMAAQS	261.9	0.0	438,187.0	3,698,032.0	7253
SO_2	annual	0.007	0.007		0.007	NMAAQS	52.4	0.0	438,323.0	3,697,947.0	7229