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AIR QUALITY BUREAU
NEW SOURCE REVIEW PERMIT
Issued under 20.2.72 NMAC

Version: 02.27.2024

Certified Mail No:

Return Receipt Requested

NSR Permit No: 10129
Facility Name: Las Vegas HMA Plant

Permittee Name: Short Line LLC

Mailing Address: PO Box 1499
Peralta, NM 87042

TEMPO/IDEA ID No: 41129 - PRN20230001
AIRS No: 35-777-1656

Permitting Action: Regular-New
Source Classification: Synthetic Minor

Facility Location: 482,170 m E by 3,943,060 m N, Zone 13;
Datum NAD83

County: San Miguel

Air Quality Bureau Contact Joseph Mashburn
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Date

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PART A FACILITY SPECIFIC REQUIREMENTS

A100 Introduction

- A. This is a new permit.

A101 Permit Duration (expiration)

- A. The term of this permit is permanent unless withdrawn or cancelled by the Department.

A102 Facility: Description

- A. The function of the facility is to produce hot mix asphalt. The 120 tph hot mix asphalt plant will include; aggregate storage piles, two 3-bin cold aggregate feeders, scalping screen, drum dryer/mixer with baghouse, incline conveyor, asphalt silo, asphalt heater, four (4) transfer conveyors, Evotherm storage tank, and two (2) asphalt cement storage tanks.
- B. This facility is located approximately 2.5 miles northeast of Las Vegas, New Mexico in San Miguel County.
- C. Tables 102.A and Table 102.B show the total potential emission rates (PER) from this facility for information only. This is not an enforceable condition and excludes emissions from Minor NSR exempt activities per 20.2.72.202 NMAC.

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

| Pollutant | Emissions (tons per year) |
|---|----------------------------------|
| Nitrogen Oxides (NO _x) | 21.1 |
| Carbon Monoxide (CO) | 22.2 |
| Volatile Organic Compounds (VOC) ¹ | 7.2 |
| Sulfur Dioxide (SO ₂) | 6.6 |
| Particulate Matter 10 microns or less (PM ₁₀) | 4.2 |
| Particulate Matter 2.5 microns or less (PM _{2.5}) | 3.2 |
| Hydrogen Sulfide (H ₂ S) | 0.006 |
| Lead | 0.002 |

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

| Pollutant | Emissions (tons per year) |
|---------------------|---------------------------|
| Asphalt Fumes (TAP) | 1.3 |
| Total HAPs** | 1.1 |

* HAP emissions are already included in the VOC emission total.

** The total HAP emissions may not agree with the sum of individual HAPs because only individual HAPs greater than 1.0 tons per year are listed here.

A103 Facility: Applicable Regulations

- A. The permittee shall comply with all applicable sections of the requirements listed in Table 103.A.

Table 103.A: Applicable Requirements

| Applicable Requirements | Federally Enforceable | Unit No. |
|--|---|----------------------------|
| 20.2.1 NMAC General Provisions | X | Entire Facility |
| 20.2.7 NMAC Excess Emissions | X (Except for Sections 6(b); 110(b)(15); 111; 112; 113; 115; and 116 that are State Enforceable Only) | Entire Facility |
| 20.2.11 NMAC Asphalt Process Equipment | X | Unit 7 (C4) |
| 20.2.61 NMAC Smoke and Visible Emissions | X | Units 10 and 12 |
| 20.2.72 NMAC Construction Permit | X | Entire Facility |
| 20.2.73 NMAC Notice of Intent and Emissions Inventory Requirements | X | Entire Facility |
| 20.2.75 NMAC Construction Permit Fees | X | Entire Facility |
| 20.2.77 NMAC New Source Performance Standards | X | Units subject to 40 CFR 60 |
| 20.2.80 NMAC Stack Heights | X | Units 7 (C4) and 12 |
| 20.2.82 NMAC Maximum Achievable Control Technology Standards for Source Categories of HAPs | X | Units subject to 40 CFR 63 |
| 40 CFR 60, Subpart A, General Provisions | X | Units subject to 40 CFR 60 |
| 40 CFR 60, Subpart I | X | Units 7 (C4) |
| 40 CFR 63, Subpart A, General Provisions | X | Units subject to 40 CFR 63 |
| 40 CFR 63, Subpart ZZZZ | X | Unit 12 |

A104 Facility: Regulated Sources

- A. Table 104.A lists the emission units authorized for this facility. Emission units identified as exempt activities (as defined in 20.2.72.202 NMAC) and/or equipment not regulated pursuant to the Act are not included.

Table 104.A: Regulated Sources List

| Unit No. | Source Description | Make | Model | Serial No. | Construction/Reconstruction Date | Manufacture Date | Manufacturer Rated Capacity /Permitted Capacity |
|----------|--|--------|-------|------------|----------------------------------|------------------|---|
| AGGPILE | Cold Aggregate Storage Pile | NA | NA | NA | 2024 | NA | 120 tph |
| 1 | Cold Aggregate Two-3-Feed Bin Loading | TBD | TBD | TBD | 2024 | 1983 | 30 yd ³ /bin 120 tph |
| 2 | Cold Aggregate Feed Bin Unloading (Conveyor) | TBD | TBD | TBD | 2024 | 1983 | 120 tph |
| 3 | Conveyor | TBD | TBD | TBD | 2024 | 1983 | 120 tph |
| 4 | Scalping Screen | TBD | TBD | TBD | 2024 | 1983 | 120 tph |
| 5 | Scalping Screen Unloading (Conveyor) | TBD | TBD | TBD | 2024 | 1983 | 120 tph |
| 6 | Conveyor Transfer to Slinger Conveyor | TBD | TBD | TBD | 2024 | 1983 | 120 tph |
| 7 | Drum Dryer/Mixer | Bituma | 200 | TBD | 2024 | 1983 | 120 tph |
| 8 | Drum Mixer Unloading (Incline Conveyor) | TBD | TBD | TBD | 2024 | 1983 | 120 tph |
| 9 | Asphalt Silo Unloading | TBD | TBD | TBD | 2024 | 1983 | 120 tph |
| 10 | Asphalt Heater | TBD | TBD | TBD | 2024 | 1983 | 1.2 MMBTU |
| 11 | Asphalt Cement Storage Tanks (2) | TBD | TBD | TBD | 2024 | 1983 | 30,000 gal. each |
| 12 | Plant Generator | CAT | 1412T | 8IAI6212 | 2024 | March 1996 | 676 hp, 504 kW |
| 13 | Haul Road Traffic | NA | NA | NA | 2024 | NA | 66 trucks/day |
| YARD | HMA Yard | NA | NA | NA | 2024 | NA | 120 tph |

1. All TBD (to be determined) units and like-kind engine replacements must be evaluated for applicability to NSPS and MACT

requirements.

A105 Facility: Control Equipment

- A. Table 105 lists all the pollution control equipment required for this facility. Each emission point is identified by the same number that was assigned to it in the permit application.

Table 105: Control Equipment List:

| Control Equipment Unit No. | Control Description | Pollutant being controlled | Control for Unit Number(s) ¹ |
|----------------------------|--|--|---|
| C1 | Conveyor Transfer Points – Wet Dust Suppression System | PM ₁₀ and PM _{2.5} | 2, 3, 5, 6 |
| C2 | Screen – Wet Dust Suppression System | PM ₁₀ and PM _{2.5} | 4 |
| C3 | Unpaved Roads – Base Course ¹³ and Water | PM ₁₀ and PM _{2.5} | 13 |
| C4 | Drum Mixer Baghouse | PM ₁₀ and PM _{2.5} | 7 |

1. Control for unit number refers to a unit number from the Regulated Equipment List

A106 Facility: Allowable Emissions

- A. The following Section lists the emission units and their allowable emission limits. (40 CFR 50, 40 CFR 60, Subparts A and I, 40 CFR 63, Subparts A and ZZZZ, 20.2.72.210.A and B.1 NMAC).

Table 106.A: Allowable Emissions

| 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 |
|----------|----------------------------------|----------------------------------|--------|--------|---------|---------|---------------------|---------------------|----------------------|----------------------|-----------------------|-----------------------|
| AGGPPILE | .2 | - | - | - | - | - | - | - | 0.4 | 0.3 | 0.06 | 0.05 |
| 1 | - | - | - | - | - | - | - | - | 0.4 | 0.3 | 0.06 | 0.05 |
| 2 | - | - | - | - | - | - | - | - | 0.005 | 0.004 | 0.002 | 0.001 |
| 3 | - | - | - | - | - | - | - | - | 0.005 | 0.004 | 0.002 | 0.001 |
| 4 | - | - | - | - | - | - | - | - | 0.08 | 0.07 | 0.006 | 0.005 |
| 5 | - | - | - | - | - | - | - | - | 0.005 | 0.004 | 0.002 | 0.001 |
| 6 | - | - | - | - | - | - | - | - | 0.005 | 0.004 | 0.002 | 0.001 |

| 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 |
|----------|-------------------------------------|-------------------------------------|-----------|-----------|------------|------------|------------------------|------------------------|-------------------------|-------------------------|--------------------------|--------------------------|
| 7 | 6.6 | 5.5 | 15.6 | 13.0 | 3.8 | 3.2 | 7.0 | 5.8 | 2.8 | 2.3 | 2.8 | 2.3 |
| 8 | - | - | 0.3 | 0.2 | 2.7 | 2.3 | - | - | 0.1 | 0.08 | 0.1 | 0.08 |
| 9 | - | - | 0.3 | 0.3 | 0.9 | 0.8 | - | - | 0.1 | 0.08 | 0.1 | 0.08 |
| 10 | 0.2 | 0.8 | 0.05 | 0.2 | 0.003 | 0.01 | 0.07 | 0.3 | 0.02 | 0.08 | 0.02 | 0.08 |
| 11 | - | - | - | - | 0.02 | 0.07 | - | - | - | - | - | - |
| 12 | 6.8 | 14.8 | 3.9 | 8.5 | 0.4 | 0.8 | 0.2 | 0.5 | 0.2 | 0.5 | 0.2 | 0.5 |
| 13 | - | - | - | - | - | - | - | - | 0.7 | 0.5 | 0.07 | 0.05 |
| YARD | - | - | 0.04 | 0.04 | 0.1 | 0.1 | - | - | - | - | - | - |

- 1 Nitrogen dioxide emissions include all oxides of nitrogen expressed as NO₂
- 2 Compliance with emergency flare emission limits is demonstrated by limiting combustion to pilot and/or purge gas only.
 “-” indicates the application represented emissions of this pollutant are not expected.
 “<” indicates that the application represented the uncontrolled mass emission rates are less than 1.0 pph or 1.0 tpy for this emissions unit and this air pollutant. Although modeled at the calculated value, the Department has determined compliance demonstrations of these very small, calculated values are either technically or practically infeasible. For limits expressed as “<”, actual emissions in excess of 1.0 pph and 1.0 tpy are excess emissions to be reported per General Condition B110.F.
 “*” indicates hourly emission limits are not appropriate for this operating situation.
- 3 To report excess emissions for sources with no pound per hour and/or ton per year emission limits, see condition B110F.

B. State Toxics Limits - Asphalt Fumes (Units 7, 8, 9, 11 and YARD)

Requirement: The state toxic pollutant, Asphalt Fumes (AF) shall be limited as follows:

- 1) Unit 7 is limited to 1.44 pph
- 2) Unit 8 is limited to 0.04 pph
- 3) Unit 9 is limited to 0.02 pph
- 4) Unit 11 is limited to 0.0004 pph
- 5) Unit YARD is limited to 0.002 pph

Compliance with Asphalt Fume emission limits is demonstrated by compliance with the requirements in Conditions A108.A, A108.B and A108.C.

The stack height for Unit 7 shall be at least 21 feet, as specified in the permit application and modeled to demonstrate compliance with air quality standards.

Monitoring: Monitor per the Monitoring requirements in Conditions A108.A, A108.B and A108.C.

Recordkeeping: The permittee shall maintain records in accordance with Conditions A108.A, A108.B, A108.C., and General Condition B109.

Reporting: The permittee shall report in accordance with Conditions A108.A, A108.B, A108.C., and General Condition B110.

A107 Facility: Allowable Startup, Shutdown, & Maintenance (SSM)

- A. Separate allowable SSM emission limits are not required for this facility since the SSM emissions are predicted to be less than the limits established in Table 106A. The permittee shall maintain records in accordance with Condition B109.C.

A108 Facility: Allowable Operations

A. Allowable Hours of Operation

Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by restricting this facility, including all permitted equipment and related activities such as truck traffic involving movement of product, to operate no more than the hours described below and the associated hourly and daily production limits in Condition 108.B.

The plant, with exception of Unit 10 and Unit 11, may only operate during the daylight hours between sunrise and sunset. See the daylight definition in Section C101.

The Asphalt Heater Unit 10 and Asphalt Cement Tanks (2) Unit 11 are authorized to operate continuously.

Monitoring: Daily, the permittee shall monitor the date, startup time, shutdown time, and the total hours of operation of the facility.

Recordkeeping: Daily, the permittee shall record the date, startup time, shutdown time, and the total hours of operation of the facility. The permittee shall maintain records in accordance with Section B109.

Reporting: The permittee shall report in accordance with Section B110.

B. Production Limits - Hot Mix Asphalt Plant

Requirement: Compliance with the limits in Table A106.A and Specific Condition A106.B shall be demonstrated by:

1. The Hot Mix Asphalt Plant production rate shall not exceed 120 tons per hour (tph).

These production rates were specified in the permit application and are the basis for the Department's modeling analysis to determine compliance with the applicable ambient air quality standards.

Monitoring: The permittee shall monitor the hourly and daily total production, and, each calendar month, the monthly rolling 12-month total production.

Recordkeeping: The permittee shall:

1. Each day, record the date, start time, and end time of any production activity.
2. Daily, record the daily production total by dividing the daily production totals by the daily hours of operation. Record the daily average hourly production rate.
3. Each calendar month, calculate and record the total monthly production and the monthly rolling 12-month total production, and
5. Maintain on site all records necessary for the calculation of the required hourly, daily, and monthly rolling 12-month production totals.

Reporting: The permittee shall report in accordance with Section B110.

C. Maximum Operating Temperature for the Drum Mixer Unloading and the Asphalt Cement Storage Tanks (Units 8 and 11)

Requirement: Compliance with the limits in Specific Conditions 106.A and 106.B shall be demonstrated by ensuring that the Drum Mixer Unloading (Unit 8) is limited to a maximum temperature of 350 degrees Fahrenheit and the Asphalt Cement Storage Tanks (Unit 11) are limited to a maximum temperature of 350 degrees Fahrenheit.

The permittee shall install, calibrate, and maintain a temperature measurement device and datalogger to continuously monitor and record the temperature of the asphalt mix in the Drum Mixer Unloading (Unit 8) and the asphalt cement in each Asphalt Cement Storage Tank (Units 11).

These maximum temperature limits were specified in the permit application to limit emissions and are the basis for the Departments analysis to determine compliance with the applicable ambient air quality standards and the state toxic, asphalt fumes, limit in Specific Condition A106.B.

Monitoring: During operations of each emissions unit, the permittee shall continuously monitor the temperature of the asphalt in the Drum Mixer Unloading (Unit 8) and the asphalt cement in each of the Asphalt Cement Storage Tanks (Unit 11).

Recordkeeping: The permittee shall:

1. Hourly, record the temperature of each asphalt silo and each storage tank, maintaining the original data logger electronic record.
2. Record the date and time the temperature measurement device or datalogger is calibrated or maintained and a description of any maintenance performed.

Determine the daily production rate as follows:

1. Maintain all records that are necessary to support the maximum temperature of the Drum Mixer Unloading (Unit 8) and the Asphalt Cement Storage Tanks (Unit 11) is not exceeded.
2. The maximum temperature (degrees F) shall be the arithmetical average of all the data collected over the previous sixty (60) minutes. The data shall be collected at least once every ten (10) minutes.

Reporting: The permittee shall report in accordance with Section B110.

A109 Facility: Reporting Schedules

- A. The permittee shall report according to the Specific Conditions and General Conditions of this permit.

A110 Facility: Fuel and Fuel Sulfur Requirements

- A. Fuel and Fuel Sulfur Requirements (Units 7, 10, and 12)

Requirement: The Drum Dryer/Mixer (Unit 7) may combust either on-spec burner fuel oil or No. 2 Diesel. The sulfur content of the on-spec burner fuel oil shall not exceed 0.5% sulfur by weight; for No. 2 Diesel the sulfur content shall not exceed 0.05% sulfur by weight.

The combustion emissions units 10 and 12 shall combust only No. 2 Diesel. The sulfur content of the fuel shall not exceed 0.05% sulfur by weight.

Monitoring: No monitoring is required. Compliance is demonstrated through records.

Recordkeeping:

- (1) The permittee shall demonstrate compliance with the natural gas or fuel oil limit on total sulfur content by maintaining records of a current, valid purchase contract, tariff sheet or transportation contract for the gaseous or liquid fuel, or fuel gas analysis, specifying the allowable limit or less.
- (2) If fuel gas analysis is used, the analysis shall not be older than one year.
- (3) Alternatively, compliance shall be demonstrated by keeping a receipt or invoice from a commercial fuel supplier, with each fuel delivery, which shall include the delivery date, the fuel type delivered, the amount of fuel delivered, and the maximum sulfur content of the fuel.

Reporting: The permittee shall report in accordance with Section B110.

A111 Facility: 20.2.61 NMAC Opacity

- A. 20.2.61 NMAC Opacity Limit–Asphalt Heater (Unit 10)

Requirement: Visible emissions from all stationary combustion emission stacks shall not equal or exceed an opacity of 20 percent in accordance with the requirements at 20.2.61.109 NMAC.

Monitoring:

- (1) Use of natural gas fuel constitutes compliance with 20.2.61 NMAC unless opacity equals or exceeds 20% averaged over a 10-minute period. When any visible emissions are observed during operation other than during a 15-minute startup mode, opacity shall be measured over a 10-minute period, in accordance with the procedures at 40 CFR 60, Appendix A, Reference Method 9 (EPA Method 9) as required by 20.2.61.114 NMAC.

- (2) In lieu of performing these Method 9 procedures the operator may optionally shut down the equipment to perform maintenance/repair to eliminate the visible emissions. Following completion of equipment maintenance/repair, the operator shall conduct visible emission observations following startup in accordance with the following procedures:
- (a) Prior to starting up the operator shall record the date, time, the maintenance/repair performed, and the name of the maintenance person and person performing the following opacity test(s).
 - (b) Visible emissions observations shall be conducted over a 6-minute observation period during operation after completion of startup mode in accordance with the procedures at 40 CFR 60, Appendix A, Reference Method 22 (EPA Method 22). Visible emissions will be considered present if they are detected for more than 30 seconds of the 6-minute observation period. If no visible emissions are observed during the 6-minute period, no further monitoring is required.
 - (c) If any visible emissions are observed during completion of the EPA Method 22 observation, subsequent opacity observations shall be conducted over a 10-minute period, in accordance with the procedures at Method 9 as required by 20.2.61.114 NMAC. If a Method 9 opacity greater than 20 percent is observed, the operator shall shut down the equipment to perform maintenance and repairs per the Monitoring requirements of this condition.

For the purposes of this condition, *Startup mode* is defined as the startup period that is described in the facility's startup plan, but not to exceed 15 minutes.

Recordkeeping:

- (1) If any visible emissions observations were conducted, the permittee shall keep records in accordance with the requirements of Section B109 and as follows:
 - (a) For any visible emissions observations conducted in accordance with EPA Method 22, record the information on the form referenced in EPA Method 22, Section 11.2.
 - (b) For any opacity observations conducted in accordance with the requirements of EPA Method 9, record the information on the form referenced in EPA Method 9, Sections 2.2 and 2.4.

Reporting: The permittee shall report in accordance with Section B110.

B. 20.2.61 NMAC Opacity Limit (Unit 12)

Requirement: Visible emissions from all emission stacks of all **compression ignition** engines shall not equal or exceed an opacity of 20 percent in accordance with the requirements at 20.2.61.109 NMAC.

Monitoring:

- (1) For compression ignition engines that are used to generate facility power and/or used for facility processing and **are not** emergency, black start, or limited use engines as defined at 40 CFR 63, Subpart ZZZZ, the permittee shall, at least once every 90 days of operation,

| |
|--|
| <p>measure opacity on each Unit for a minimum of 10 minutes in accordance with the procedures of 40 CFR 60, Appendix A, Method 9. The permittee shall also measure opacity on a Unit’s emissions stack when any visible emissions are observed during steady state operation.</p> <p>(2) For emergency, standby, or limited use compression ignition engines that operate on a limited basis, the permittee shall, at least once during any year that the unit is operated and no less frequently than once every 5 years regardless of unit operation, measure opacity during steady state operation on each Unit for a minimum of 10 minutes in accordance with the procedures of 40 CFR 60, Appendix A, Method 9.</p> <p>For the purposes of this condition, <i>Startup mode</i> is defined as the startup period that is described in the facility’s startup plan.</p> |
| <p>Recordkeeping:</p> <p>(1) If any visible emissions observations were conducted, the permittee shall keep records in accordance with the requirements of Section B109 and as follows:</p> <p>(a) For any opacity observations conducted in accordance with the requirements of EPA Method 9, record the information on the form referenced in EPA Method 9, Sections 2.2 and 2.4.</p> <p>(b) For each emergency, black start, and limited use compression ignition engine, the permittee shall also record the number of operating hours per year of each Unit and the reason for operating the unit.</p> |
| <p>Reporting: The permittee shall report in accordance with Section B110.</p> |

A112 Facility: Haul Roads

A. Truck Traffic

| |
|--|
| <p>Requirement: Compliance with the allowable particulate emissions in Table 106.A shall be demonstrated by limiting the number of haul road round trips to 66 round trips per day.</p> |
| <p>Monitoring: The permittee shall monitor the total number of haul road round trips per day.</p> |
| <p>Recordkeeping: The permittee shall keep daily records of the total number of haul road trips per day.</p> |
| <p>Reporting: The permittee shall report in accordance with Section B110.</p> |

B. Haul Road Control

Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by:

Truck traffic areas and haul roads going in and out of the plant site shall be watered **and** treated by application of base course to control particulate emissions. This condition demonstrates compliance with the 80% control efficiency used in the permit application and modeling.

This control measure shall be used on roads as far as the nearest public road.

Monitoring: The permittee shall monitor the frequency, quantity, and location(s) of the water application, or equivalent control measures.

Recordkeeping: The permittee shall keep daily records of the frequency, quantity, and location(s) of the water application, or equivalent control measures.

Reporting: The permittee shall report in accordance with Section B110.

A113 Facility: Initial Location Requirements

A. Co-Located Hot Mix Asphalt Plant, Co-located with Las Vegas Aggregate Crusher & Screening

Requirement: This facility may co-locate with the Short Line LLC. - Las Vegas Aggregate Crusher & Screening Plant (NSR # 10131) or subsequent Administrative (20.2.72.219.A NMAC) and/or Technical Permit Revisions (20.2.72.219.B NMAC) of these permits. If this permit 10129 or permit number 10131 undergo a Significant Permit Revision (20.2.219.72.D), co-location with this facility is allowed if the modified permit application, review, and permit includes approved air dispersion modeling or modeling waiver allowing co-location with this facility.

The facility and Aggregate Crusher & Screening plant must meet the setback requirements in their respective permits, whichever is greater.

This facility shall not co-locate with another facility aside from the Short Line LLC., Las Vegas Aggregate Crusher & Screening Plant (NSR # 10131), without showing compliance with ambient air quality standards. The facility may co-locate with a GCP3 or GCP5 facility and meets the requirements of the GCP regulation and the requirements of its own permit.

Monitoring: N/A

Recordkeeping: The permittee shall keep records of the permit number of the co-located hot mix asphalt plant, concrete batch plant and aggregate plants.

Reporting: The permittee shall report all other records according to Condition B110.

A114 Facility: Relocation Requirements

- A. This facility shall not be relocated.

A115 Alternative Operating Scenario – Not Applicable

A116 Compliance Plan – Not Applicable

EQUIPMENT SPECIFIC REQUIREMENTS

OIL AND GAS INDUSTRY

A200 Oil and Gas Industry – Not Required

CONSTRUCTION INDUSTRY - AGGREGATE

A300 Construction Industry – Aggregate – Not Required

CONSTRUCTION INDUSTRY – ASPHALT

A400 Construction Industry – Asphalt

- A. This section has common equipment related to most Asphalt Operations.

A401 Equipment Substitutions

- A. Substitution of aggregate handling equipment is authorized provided the replacement equipment is functionally equivalent and has the same or lower process capacity as the piece of equipment it is replacing in the most recent permit. The replacement equipment shall comply with the opacity requirements in this permit.
- B. The Department shall be notified within fifteen (15) days of equipment substitutions using the Equipment Substitution Form provided by the Department and available online.

A402 Process Equipment – Drum Mixer, Screens, Conveyors, Surge Bins, Pugmills

- A. Drum Dryer/Mixer (Units 7) and Drum Dryer/Mixer Baghouse (Unit C4) – Operating Requirements

Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by:

1. Emissions from the Drum Dryer/Mixer, Unit 7, shall at all times be routed to and controlled by the Drum Mixer Baghouse, Unit C4.
2. The Drum Dryer/Mixer Baghouse (Unit C4) shall be equipped with a magnehelic gauge or equivalent differential pressure gauge.
3. The differential pressure gauge shall be equipped with an electronic recording device (data logger) capable of continuously recording each gauge's differential pressure and an automatic audible alarm alerting the operator if the differential pressure is not within the manufacturer's specified normal differential pressure range or within 15% of the operating pressure recorded in the Unit C4 baghouse initial compliance test.
4. Each gauge and data logger shall be maintained, replaced, and calibrated as required so that it consistently provides correct and accurate readings.
5. Baghouse fines from the Drum Dryer/Mixer Baghouse (Unit C4) shall be dropped directly from the baghouse into the fines hopper using a fully enclosed design. Fines from each fines hopper shall either be returned to the asphalt mix process of the associated Drum Dryer/Mixer (Unit 7) via a closed-loop system or handled by a no visible emissions excess fines processing system such as a fully enclosed water-infused, zero-visible emissions system or other Department approved process, for removal off site. Baghouse fines shall not be stored on site other than in the excess fines processing system.

Monitoring:

1. Monthly, the permittee shall monitor and inspect the Drum Dryer/Mixer (Unit 7), exhaust stacks, and Baghouse (Unit C4) to ensure all emissions are captured and ducted through stacks that are securely connected to the Drum Dryer/Mixer Baghouse (Unit C4).
2. The permittee shall monitor any time any gauge and data logger are maintained, replaced, and/or calibrated as required so each gauge and data logger consistently provide correct and accurate readings.
3. Daily, the permittee shall monitor and inspect the excess fines handling system for each Drum Dryer/Mixer Baghouse (Unit C4). At a minimum, the visual inspection shall include checks for visible emissions, integrity of the enclosures, malfunctions and deficiencies in dust control effectiveness, and any corrective action(s) taken. Each calendar week in which either excess fines processing system operates, a 6-minute EPA Method 22 visible emissions test will be performed on that system during its operation. Visible emissions are considered present if they are detected for more than 30 seconds of the 6-minute observation period.

Recordkeeping:

1. The permittee shall maintain records of each inspection of each exhaust stack and ducting of the Drum Dryer/Mixer (Unit 7), and Drum Dryer/Mixer Baghouse (Unit C4).
2. The permittee shall maintain records of operational inspections, maintenance conducted and gauge calibrations.
3. The permittee shall maintain records of each baghouse’s differential pressure and electronic or hard copy data logger records.
4. The permittee shall maintain records of each visual opacity check(s), the corresponding differential pressures, to include with the date(s), times, and name of inspector making observations.
5. Each day a record shall be made of each excess fines processing system inspection, including any visible emissions, the integrity of the enclosures, any malfunction(s), any corrective action(s) taken, and the name of the inspector. The permittee shall record in accordance with Section B109 of this permit. For each baghouse excess fines processing system, the record format shall list and describe what shall be inspected to ensure the inspector understands the inspection responsibilities.

Reporting: The permittee shall report in accordance with Section B110.

B. Drum Dryer/Mixer (Unit 7) – Initial Compliance Test

Requirement: Compliance with PM_{2.5}, PM₁₀, NO_x, and CO emission limits in Table 106.A for Unit 7 shall be demonstrated by the permittee conducting an initial compliance test for PM₁₀, PM_{2.5}, Filterable and Condensable PM, NO_x, and CO, on the Batch Plant Baghouse stack (C4).

Monitoring: During the initial compliance test for Unit 7 the permittee shall monitor the baghouse pressure drop, and the associated hot mix asphalt plant's hourly production rate for the baghouse (Unit C4).

Recordkeeping: The results shall be included with the test reports that are required to be furnished to the Department and shall be listed in tabular form or as part of the summary page of the test reports. The permittee shall maintain records in accordance with Section B109.

Reporting: The permittee shall report in accordance with the Department’s *Universal Test Notification, Protocol and Report Form and Instructions*.

C. Drum Dryer/Mixer (Unit 7) – NSPS Subpart I

- Requirement:**
1. This facility is subject to NSPS 40 CFR 60, Subpart A and Subpart I - Standards of Performance for Hot Mix Asphalt Facilities. The permittee shall comply with both the notification requirements in Subpart A and with all the specific requirements of Subpart I.
 2. At all times, stack emissions from the Drum Dryer/Mixer (Unit 7) shall be routed to the corresponding Baghouse (Unit C4) to comply with 40 CFR 60, Subpart I.

- 3) Particulate emissions to the atmosphere from Drum Dryer/Mixer (Unit 7) and Drum Dryer/Mixer Baghouse (Units C4) shall not exceed 0.04 grains/dry standard cubic foot of particulate matter and shall not exhibit 20% opacity from the stack outlet.

Monitoring:

- 1) While the facility is operating, the following monitoring shall be conducted to confirm proper operation of the Drum Dryer/Mixer (Unit 7) and Drum Dryer/Mixer Baghouse (Unit C4): EPA Method 9 opacity tests shall be conducted according to the requirements of 40 CFR 60, Subpart I and Appendix A.
- 2) The permittee shall continuously monitor differential pressure of the Drum Dryer/Mixer Baghouse (Unit C4).
- 3) Operations shall cease immediately if the pressure drop is not within the manufacturer's specified normal operating range or the range correlating with opacity tests demonstrating compliance with the NSPS I opacity limits. Operations shall not commence until the cause of the deviation is determined and rectified.

Recordkeeping: The permittee shall record the following information:

- 1) EPA Method 9 opacity observations and associated differential pressure readings.
- 2) The manufacturer's specified normal differential pressure range for the Drum Dryer/Mixer Baghouse (Units C4). The permittee shall have this record available at all times of operation.
- 3) At least hourly, during operation, the differential pressure readings for the Drum Dryer/Mixer Baghouse (Unit C4).
- 4) Any deviation in Drum Dryer/Mixer Baghouse (Unit C4) differential pressure, the cause of the deviation, the time operations ceased for repairs, the time operations commenced after repairs, and the corrective actions taken.

Reporting: The permittee shall comply with the reporting requirements of 40 CFR 60, Subpart A and Subpart I.

D. Wet Dust Suppression System (2, 3, 4, 5, and 6)

Requirement: Compliance with allowable particulate emission limits in Table 106.A shall be demonstrated by:

- (1) Conveyor Transfer Point Units 2, 3, 5, and 6, and Screen 4 shall have a Wet Dust Suppression System installed to minimize fugitive emissions to the atmosphere from emission points and to meet the emission limitations contained in this permit.
- (2) At any time, if visible emissions at material transfer points are observed, additional water sprays shall be added or if already installed, turned on, to minimize the visible emissions.
- (3) Each Wet Dust Suppression System shall be turned on and properly functioning at all times the facility is operating, unless rain or snow precipitation achieves an equivalent

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| <p>level of dust control. Any problems with the control devices shall be corrected before commencement of operation.</p> |
| <p>Monitoring: On each day of operation at the commencement of operation of the Wet Dust Suppression System, the permittee shall inspect the Wet Dust Suppression System. At a minimum, the visual inspection shall include checks for malfunctions and deficiencies in dust control effectiveness, such as breaches in the physical barriers controlling dust emissions; spray nozzle clogs; misdirected sprays; insufficient water pressure; and/or any other dust control equipment deficiencies or malfunctions.</p> |
| <p>Recordkeeping: A daily record shall be made of the Wet Dust Suppression System inspection and any maintenance activity that resulted from the inspection. The permittee shall record in accordance with Section B109 of this permit and shall also include a description of any malfunction and any corrective actions taken. The record shall be formatted with a description of what shall be inspected to ensure the inspector understands the inspection responsibilities. If the Wet Dust Suppression System is turned off due to rain or snow precipitation that achieve the equivalent level control as the Water Spray Units, it shall be so noted in the daily record.</p> |
| <p>Reporting: The permittee shall report in accordance with Section B110.</p> |

A403 Asphalt Cement Storage Tanks

A. Asphalt Cement Storage Tanks Throughput (Unit 11)

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| <p>Requirement: Compliance with the allowable emission limits for Unit 11 in Table 106.A and Specific Condition A106.B shall be demonstrated by limiting the monthly rolling 12-month total asphalt cement throughput:</p> <ol style="list-style-type: none"> 1. The Asphalt Cement Storage Tanks are limited to 2,603,036 gallons per year for the two (Unit 11) tanks, combined. |
| <p>Monitoring: Each calendar month, the permittee shall monitor the total throughput of each asphalt cement storage tank for each loading event for each tank and the monthly total combined throughput for all cement storage tanks.</p> |
| <p>Recordkeeping: The permittee shall record:</p> <ol style="list-style-type: none"> (1) for each tank, the throughput of the asphalt cement in gallons for each loading event, and (2) each month the permittee shall calculate and record: <ol style="list-style-type: none"> (a) during the first 12 months of monitoring, the cumulative total liquid throughput of all cement storage tanks, and (b) after the first 12 months of monitoring, the monthly rolling 12-month total liquid throughput for all cement storage tanks, and <p>Records shall be maintained in accordance with Section B109.</p> |
| <p>Reporting: The permittee shall report in accordance with Section B110.</p> |

A404 Combustion Equipment – Heaters, Engines

A. Compliance with the allowable emission limits in Table 106.A shall be demonstrated by maintaining the stack height of Unit 12 to meet 20.2.80 NMAC Stack Heights. The stack height for Unit 12 shall be at least 14 feet, as specified in the permit application and modeled to demonstrate compliance with air quality standards.

B. Maintenance and Repair Monitoring (Unit 12)

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| <p>Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by properly maintaining and repairing the units.</p> |
| <p>Monitoring: Maintenance and repair shall meet the minimum manufacturer's or permittee's recommended maintenance schedule. Activities that involve maintenance, adjustment, replacement, or repair of functional components with the potential to affect the operation of an emission unit shall be documented as they occur for the following events:</p> <p>(1) Routine maintenance that takes a unit out of service for more than two hours during any twenty-four-hour period.</p> <p>(2) Unscheduled repairs that require a unit to be taken out of service for more than two hours in any twenty-four-hour period.</p> |
| <p>Recordkeeping: The permittee shall maintain records in accordance with Section B109, including records of maintenance and repairs activities and a copy of the manufacturer's or permittee's recommended maintenance schedule.</p> |
| <p>Reporting: The permittee shall report in accordance with Section B110.</p> |

C. Initial Compliance Test (Unit 12)

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| <p>Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by performing an initial compliance test.</p> |
| <p>Monitoring: The permittee shall perform an initial compliance test in accordance with the General Testing Requirements of Section B111. Emission testing is required for NOx and CO. Test results that demonstrate compliance with the CO emission limits shall also be considered to demonstrate compliance with the VOC emission limits.</p> <p>The monitoring exemptions of Section B108 do not apply to this requirement. For units with g/hp-hr emission limits, the engine load shall be calculated by using the following equation:</p> $\text{Load(Hp)} = \frac{\text{Fuel consumption (scfh)} \times \text{Measured fuel heating value (LHV btu/scf)}}{\text{Manufacturer's rated BSFC (btu/bhp-hr) at 100\% load or best efficiency}}$ |
| <p>Recordkeeping: The permittee shall maintain records in accordance with the applicable requirements in Sections B109, B110, and B111.</p> |

Reporting: The permittee shall report in accordance with the applicable requirements in Sections B109, B110, and B111.

D. 40 CFR 63, Subpart ZZZZ (Unit 12)

Requirement: The units are subject to 40 CFR 63, Subpart ZZZZ and the permittee shall comply with all applicable requirements of Subpart A and Subpart ZZZZ.

Monitoring: The permittee shall comply with all applicable monitoring requirements of 40 CFR 63, Subpart A and Subpart ZZZZ.

Recordkeeping: The permittee shall comply with all applicable recordkeeping requirements of 40 CFR 63, Subpart A and Subpart ZZZZ, including but not limited to 63.6655 and 63.10.

Reporting: The permittee shall comply with all applicable reporting requirements of 40 CFR 63, Subpart A and ZZZZ, including but not limited to 63.6645, 63.6650, 63.9, and 63.10.

A405 20.2.11 NMAC – Asphalt Process Equipment

A. Asphalt Process Equipment (Unit 7)

Requirement: Compliance with the allowable emission limits in Table 106.A shall be demonstrated by:

1. The permittee shall not operate asphalt process equipment without a fugitive dust control system. The fugitive dust control system shall be operated and maintained so that all particulate emissions are limited to the stack outlet.
2. Fugitive particulate emissions from other operations in support of the asphalt plant (such as storage piles, front-end loaders, and materials handling around the asphalt process equipment) are not subject to Section 109 of 20.2.11 NMAC.

Monitoring

1. The permittee shall maintain records of daily visual emission inspections of the asphalt processing equipment, including the date, time, name of inspector making observations, and a description of any malfunction and any corrective actions taken.
2. The permittee shall perform a daily visual emission inspection on the asphalt processing equipment.

Recordkeeping: The permittee shall maintain records in accordance with Section B109.

Reporting: The permittee shall report in accordance with Section B110.

PART B GENERAL CONDITIONS (Attached)

PART C MISCELLANEOUS: Supporting On-Line Documents; Definitions; Acronyms (Attached)