Statement of Basis - Narrative
NSR Permit

Type of Permit Action: Regular-New
Facility: **Las Vegas Aggregate Crusher and Screening Plant**
Company: Short Line LLC
Permit No(s).: 10131
Tempo/IDEA ID No.: 41130 - PRN20230001
Permit Writer: Todd Sherrill

Fee Tracking (not required for Title V)

Tracking	**NSR tracking entries completed:** [x] Yes [] No
	NSR tracking page attached to front cover of permit folder: [x] Yes [] No
	Paid Invoice Attached: [x] Yes [] No
	Balance Due Invoice Attached: [] Yes [x] No
	Invoice Comments: Paid in full as of 1/9/2024

Permit Review	**Date to Enforcement:** N/A	**Date of Enforcement Reply:** N/A
	Date to Applicant: 2/22/2024	**Date of Applicant Reply:**2/26/2024
	Date to EPA: N/A	**Date of EPA Reply:** N/A
	Date to Supervisor: 2/15/2024	

1.0 Plant Process Description:

The Short Line LLC, Las Vegas Aggregate Crusher & Screening plant consists of storage material piles, a feeder/primary crusher with under conveyors, a secondary crusher with under conveyor, a screen with under conveyors, three (3) conveyors, three (3) stacker conveyors, a 350 horsepower (HP) diesel-fired engine to power the feeder and primary crusher, and a 325HP diesel-fired generator/engine to power the rest of the plant.

From the raw material source onsite (RAW), a front-end loader transfers aggregate/recycle into the feeder (Unit 1). From the feeder, waste material is transferred by the waste conveyor (Unit 2) to a storage pile (Unit 11) or crushed in the Primary Crusher (Unit 3). Crushed material from the primary crusher is conveyed (Unit 4) to the Secondary Crusher (Unit 5) for further crushing. From the secondary crusher, crushed material is conveyed (Unit 6) to the Screen (Unit 7). Oversized material from the screen is returned by stacker conveyor 1 (Unit 8) to the Secondary Crusher (Unit 5) for further sizing. Product from the screen is transferred on to one of two Stacker Conveyors (Units 9 and 10) on one of two storage piles (Unit 11). Material is transported by front-end loader from the product storage piles to the finish storage piles (FPILE).

Fugitive dust generated during aggregate processing will be controlled by the inherent moisture content of the material and a “Wet Dust Suppression System” to no more than 7% opacity at screening and conveyor transfer points and 12% opacity at crushing operations. No fugitive dust controls are proposed for the raw material storage piles (Unit RAW), feeder loading (Unit 1) or finish storage piles (Unit FPILE).

The feeder/primary crusher will be powered by a 350 hp diesel-fired engine (Unit 12) and the rest of the plant will be powered by a 325 hp diesel-fired engine (Unit 13). No emission controls are proposed for the generator/engines.

The Short Line LLC Las Vegas Aggregate Crushing & Screening plant will be permitted to co-located with a hot mix asphalt plant identified as Short Line LLC's Las Vegas HMA. The Las Vegas HMA has submitted a separate 20.2.72 NMAC permit application that is going through technical review.
Truck traffic (14) will be limited to 252 trucks per day. Fugitive road dust will be controlled by basecourse and watering to reduce excess fugitive emissions.

2.0 Description of this Modification:

Short Line, LLC (Short Line) is applying for a new 20.2.72 NMAC air quality permit for a 200 ton per hour (tph) aggregate crushing and screening plant to be operated within county of San Miguel, state of New Mexico. The regulation governing this permit application is 20.2.72.200.A(1) NMAC. The plant will be identified as Las Vegas HMA & Crusher and will be located at 1109 Airport Road in Las Vegas, NM, 87701.

3.0 Source Determination:

1. The emission sources evaluated include the Las Vegas HMA Plant and the Aggregate Crushing and Screening Plant.

2. Single Source Analysis:

A. SIC Code: Do the facilities belong to the same industrial grouping (i.e., same two-digit SIC code grouping, or support activity)? No

B. Common Ownership or Control: Are the facilities under common ownership or control? Yes

C. Contiguous or Adjacent: Are the facilities located on one or more contiguous or adjacent properties? Yes

3. Is the source, as described in the application, the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes? Yes

4.0 PSD Applicability:

A. The source, as determined in 3.0 above, is a minor source before and after this modification.

5.0 History (In descending chronological order, showing NSR and TV): *The asterisk denotes the current active NSR and Title V permits that have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
10131	2/23/2024	NSR - New	Short Line LLC, Las Vegas Aggregate Crusher and Screening is seeking to obtain an NSR permit to construct the Las Vegas Aggregate Crusher and Screening plant near Las Vegas, NM.

6.0 Public Response/Concerns: As of February 23, 2024 this permit writer received 12 written public comment from citizens of Las Vegas expressing concern for the proposed issuance of the Short Line LLC, permit.

7.0 Startup and Shutdown:

A. If applicable, did the applicant indicate that a startup, shutdown, and emergency operational plan was developed in accordance with 20.2.70.300.D(5)(g) NMAC? N/A
B. If applicable, did the applicant indicate that a malfunction, startup, or shutdown operational plan was developed in accordance with 20.2.72.203.A.5 NMAC? Yes
C. Did the applicant indicate that a startup, shutdown, and scheduled maintenance plan was developed and implemented in accordance with 20.2.7.14.A and B NMAC? Yes
D. Does the facility have emissions due to routine or predictable startup, shutdown, and maintenance? No

8.0 Compliance and Enforcement Status This is a new NSR permit with no compliance test history. All required compliance tests will be completed in a timely manner.

9.0 Modeling: Eric Peters is the assigned modeler for this project. He indicated that his 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, NO2, PM10, PM2.5, and SO2; NMAAQS for CO, NO2, and SO2.

10.0 State Regulatory Analysis(NMAC/AQCR):

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.1	General Provisions	Yes	Facility	The facility is subject to Title 20 Environmental Protection Chapter 2 Air Quality of the New Mexico Administrative Code so is subject to Part 1 General Provisions, Update to Section 116 of regulation for Significant figures & rounding. Applicable with no permitting requirements.
2.3	Ambient Air Quality Standards	Yes	Facility	**NSR:** 20.2.3 NMAC is a SIP approved regulation that establishes State standards. The NMAAQS themselves are not an "applicable requirement" with which a source must directly comply. The promulgation of a NMAAQS does not, in and of itself automatically result in actionable measures to a source. Instead, the specific measures contained in each individual issued permit, other state promulgated rules, and NM's EPA approved SIP are the relevant applicable requirements (such as NSPS and MACT).
2.7	Excess Emissions	Yes	Facility	Applies to all facilities' sources. Federally enforceable except for Sections 6(b); 110(b)(15); 111; 112; 113; 115; and 116 that are State Enforceable Only.
2.61	Smoke and Visible Emissions	Yes	12, 13	This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares unless your equipment is subject to another state regulation that limits particulate matter such as 20.2.19 NMAC (see 20.2.61.109 NMAC). **If equipment at your facility was subject to the repealed regulation 20.2.37 NMAC it is now subject to 20.2.61 NMAC.**

Citation 20 NMAC	Title	Applies (Y/N)	Unit(s) or Facility	Justification:
2.72	Construction Permits	Yes	Facility	NSR Permits are the applicable requirement, including 20.2.72 NMAC.
2.73	NOI & Emissions Inventory Requirements	Yes,	Facility	Applicable to all facilities that require a permit. PER **>** 10 tpy for a regulated air contaminant.
2.75	Construction Permit Fees	Yes	Facility	This facility is subject to 20.2.72 NMAC
2.77	New Source Performance Standards	Yes	2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13	Applies to any stationary source constructing or modifying and which is subject to the requirements of 40 CFR Part 60.
2.82	MACT Standards for Source Categories of HAPs	Yes	12, 13	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63.

11.0 Federal Regulatory Analysis:

Federal Regulation	Title	Applies (Y/N)	Unit(s) or Facility	Comments
Air Programs Subchapter C (40 CFR 50)	National Primary and Secondary Ambient Air Quality Standards	Yes	Facility	The modeling and conditions developed from the modeling are the applicable requirements to demonstration compliance with the NAAQs.
NSPS Subpart A (40 CFR 60)	General Provisions	Yes	2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13	Applies if any other subpart applies.
NSPS 40 CFR 60, Subpart 000	Standards of Performance for Nonmetallic Mineral Processing Plants	Yes	2, 3, 4, 5, 6, 7, 8, 9, 10, 11	The provisions of this subpart are applicable to the following affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station. Also, crushers and grinding mills at hot mix asphalt facilities that reduce the size of nonmetallic minerals embedded in recycled asphalt pavement and subsequent affected facilities up to, but not including, the first storage silo or bin are subject to the provisions of this subpart.
40 CFR Part 60 Subpart IIII (Quad-I)	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	Yes	12, 13	(a) The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) as specified in paragraphs (a)(1) through (3) of this section. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. Link to regulation - read more
MACT Subpart A	General Provisions	Yes	12, 13	Applies if any other subpart applies.

Federal Regulation	**Title**	**Applies (Y/N)**	**Unit(s) or Facility**	**Comments**
(40 CFR 63)				
40 CFR 63 Subpart ZZZZ (Quad Z)	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	Yes	12, 13	See 63.6580 and EPA Region 1's Reciprocating Internal Combustion Guidance website. A facility is subject to this subpart if they own or operate a stationary RICE at a major **OR** area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand.

Permit Writer comments:

A. A public hearing will take place for this permitting action.