Universal Application 4

Air Dispersion Modeling Report

Refer to and complete Section 16 of the Universal Application form (UA3) to assist your determination as to whether modeling is required. If, after filling out Section 16, you are still unsure if modeling is required, e-mail the completed Section 16 to the AQB Modeling Manager for assistance in making this determination. If modeling is required, a modeling protocol would be submitted and approved prior to an application submittal. The protocol should be emailed to the modeling manager. A protocol is recommended but optional for minor sources and is required for new PSD sources or PSD major modifications. Fill out and submit this portion of the Universal Application form (UA4), the "Air Dispersion Modeling Report", only if air dispersion modeling is required for this application submittal. This serves as your modeling report submittal and should contain all the information needed to describe the modeling. No other modeling report or modeling protocol should be submitted with this permit application.

16-	16-A: Identification				
1	Name of facility:	Las Vegas HMA Plant			
2	Name of company:	Short Line, LLC			
3	Current Permit number:	New Permit			
4	Name of applicant's modeler:	Paul Wade			
5	Phone number of modeler:	505-830-9680 x6			
6	E-mail of modeler:	pwade@montrose-env.com			

16	-B: Brief						
1	Was a modeling protocol submitted and approved?	Yes□	No⊠				
2	Why is the modeling being done?	New Facility					
3	Describe the permit changes relevant to the modeling.						
	New facility consisting of a new HMA plant and crushing and screening plant each operating under a different permit						
4	What geodetic datum was used in the modeling?	NAD83					
5	How long will the facility be at this location?	Permanent					
6	Is the facility a major source with respect to Prevention of Significant Deterioration (PSD)?	Yes□	No⊠				

7	Identify the Air Quality Control Region (AQCR) in which the fac	cility is located	154			
	List the PSD baseline dates for this region (minor or major, as appropriate).					
8	NO2	NA				
0	SO2	NA				
	PM10	NA				
PM2.5 NA						
	Provide the name and distance to Class I areas within 50 km of the facility (300 km for PSD permits).					
9	Pecos Wilderness Area, 20.7 km					
10	Is the facility located in a non-attainment area? If so describe below Yes□ No⊠					
11	Describe any special modeling requirements, such as streamline permit requirements.					
11						

16-	16-C: Modeling History of Facility							
	Describe the modeling history of the facility, including the air permit numbers, the pollutants modeled, the National Ambient Air Quality Standards (NAAQS), New Mexico AAQS (NMAAQS), and PSD increments modeled. (Do not include modeling waivers).							
	Pollutant	Latest permit and modification number that modeled the pollutant facility-wide.	Date of Permit	Comments				
	CO	NA		New Permit				
	NO ₂	NA		New Permit				
1	SO ₂	NA		New Permit				
	H ₂ S	NA		New Permit				
	PM2.5	NA		New Permit				
	PM10	NA		New Permit				
	Lead	N/A						
	Ozone (PSD only)	N/A						
	NM Toxic Air Pollutants (20.2.72.402 NMAC)	NA		New Permit				

16-	16-D: Modeling performed for this application						
1	For each pollutant, indicate the modeling performed and submitted with this application. Choose the most complicated modeling applicable for that pollutant, i.e., culpability analysis assumes ROI and cumulative analysis were also performed.						
	Pollutant	ROI	Cumulative analysis	Culpability analysis	Waiver approved	Pollutant not emitted or not changed.	

СО	\boxtimes			
NO ₂	\boxtimes	\boxtimes		
SO ₂	\boxtimes	\boxtimes		
H ₂ S	\boxtimes			
PM2.5	\boxtimes	\boxtimes		
PM10	\boxtimes	\boxtimes		
Lead				
Ozone				
State air toxic(s) (20.2.72.402 NMAC)				

16-E: New Mexico toxic air pollutants modeling List any New Mexico toxic air pollutants (NMTAPs) from Tables A and B in 20.2.72.502 NMAC that are modeled for this 1 application. List any NMTAPs that are emitted but not modeled because stack height correction factor. Add additional rows to the table below, if required. **Emission Rate Emission Rate Screening** Stack Height Emission Rate/ Pollutant **Correction Factor** 2 (pounds/hour) Level (pounds/hour) (meters) **Correction Factor** Asphalt 1.5 0.333 6.4 1 1.5 Fumes

16-F: Modeling options						
1	Was the latest version of AERMOD used with regulatory default options? If not explain below.	Yes⊠	No□			

16-	16-G: Surrounding source modeling						
1	Date of surrounding source retrieval		6/1/2023				
2	If the surrounding source inventory provided by the Air Quality Bureau was believed to be inaccurate, describe how the sources modeled differ from the inventory provided. If changes to the surrounding source inventory were made, use the table below to describe them. Add rows as needed.						
2	AQB Source ID	Description of Corrections					

16-	16-H: Building and structure downwash						
1	How many buildings are present at the facility?	6 – HMA Plant					
2	How many above ground storage tanks are present at the facility?	1 – HMA Plant					
3	Was building downwash modeled for all buildings and	tanks? If not explain why below.	Yes⊠	No□			
4	Building comments						

16	16-I: Receptors and modeled property boundary							
1	 "Restricted Area" is an area to which public entry is effectively precluded. Effective barriers include continuous fencing, continuous walls, or other continuous barriers approved by the Department, such as rugged physical terrain with a steep grade that would require special equipment to traverse. If a large property is completely enclosed by fencing, a restricted area within the property may be identified with signage only. Public roads cannot be part of a Restricted Area. A Restricted Area is required in order to exclude receptors from the facility property. If the facility does not have a Restricted Area, then receptors shall be placed within the property boundaries of the facility. Describe the fence or other physical barrier at the facility that defines the restricted area. 							
	Fencing and G	Gates restrict ac	ccess					
2	Receptors must be placed along publicly accessible roads in the restricted area.YesAre there public roads passing through the restricted area?Yes							
3	Are restricted	l area boundary	/ coordinates	included in the modelir	ng files?		Yes⊠	No□
	Describe the	receptor grids a	and their spac	ing. The table below ma	ay be used, adding ro	ws as nee	eded.	
	Grid Type	Shape	Spacing	Start distance from restricted area or center of facility	End distance from restricted area or center of facility	Comments		
	Very Fine	Fence Following	50	0	500			
4	Very Fine	Fence Following	100	500	1000			
	Fine	Fence Following	250	1000	3000			
	Fine	Fence Following	500	3000	5000			
	Course	Fence Following	1000	5000	50000			
	Describe rece	ptor spacing al	ong the fence	line.				
5	25 meters							

6 Describe the PSD Class I area receptors.

16-	16-J: Sensitive areas					
1	Are there schools or hospitals or other sensitive areas near the facility? If so describe below. This information is optional (and purposely undefined) but may help determine issues related to public notice.	Yes□	No⊠			
3	The modeling review process may need to be accelerated if there is a public hearing. Are	Yes□	No⊠			
	there likely to be public comments opposing the permit application?					

16	-K: Modeling Scenarios					
1	Identify, define, and describe all modeling scenarios. Examples of modeling scenarios include using different production rates, times of day, times of year, simultaneous or alternate operation of old and new equipment during transition periods, etc. Alternative operating scenarios should correspond to all parts of the Universal Application and should be fully described in Section 15 of the Universal Application (UA3).					
	None					
2	Which scenario produces the highest concentrations? Why?					
2	NA					
3	Were emission factor sets used to limit emission rates or hours of operation? (This question pertains to the "SEASON", "MONTH", "HROFDY" and related factor sets, not to the factors used for calculating the maximum emission rate.)	Yes⊠	No□			
4	If so, describe factors for each group of sources. List the sources in each group before the factor table for that group. (Modify or duplicate table as necessary. It's ok to put the table below section 16-K if it makes formatting easier.) Sources: Daylight Hours all sources except Asphalt Heater (Unit 10) and Asphalt Cement Storage Tank (Unit 11). For Units 10 and 11, sources will be permitted to operate 24 hours per day.					

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Т

		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	12:00 AM	0	0	0	0	0	0	0	0	0	0	0	0
	1:00 AM	0	0	0	0	0	0	0	0	0	0	0	0
	2:00 AM	0	0	0	0	0	0	0	0	0	0	0	0
	3:00 AM	0	0	0	0	0	0	0	0	0	0	0	0
	4:00 AM	0	0	0	0	0	0	0	0	0	0	0	0
	5:00 AM	0	0	0	1	1	1	1	1	0.5	0	0	0
	6:00 AM	0	0.5	1	1	1	1	1	1	1	1	0.5	0
	7:00 AM	1	1	1	1	1	1	1	1	1	1	1	1
	8:00 AM	1	1	1	1	1	1	1	1	1	1	1	1
	9:00 AM	1	1	1	1	1	1	1	1	1	1	1	1
	10:00 AM	1	1	1	1	1	1	1	1	1	1	1	1
	11:00 AM	1	1	1	1	1	1	1	1	1	1	1	1
	12:00 PM	1	1	1	1	1	1	1	1	1	1	1	1
	1:00 PM	1	1	1	1	1	1	1	1	1	1	1	1
	2:00 PM	1	1	1	1	1	1	1	1	1	1	1	1
	3:00 PM	1	1	1	1	1	1	1	1	1	1	1	1
	4:00 PM	1	1	1	1	1	1	1	1	1	1	1	1
	5:00 PM	0.5	1	1	1	1	1	1	1	1	1	0	0
	6:00 PM	0	0	0	1	1	1	1	1	0.5	0	0	0
	7:00 PM	0	0	0	0	0	0.5	0.5	0	0	0	0	0
	8:00 PM	0	0	0	0	0	0	0	0	0	0	0	0
	9:00 PM	0	0	0	0	0	0	0	0	0	0	0	0
	10:00 PM	0	0	0	0	0	0	0	0	0	0	0	0
	11:00 PM	0	0	0	0	0	0	0	0	0	0	0	0
	Total	10.5	11.5	12	14	14	14.5	14.5	14	13	12	10.5	10
lf ł	nourly, variable	emissio	n rates w	vere used	d that w	ere not d	escribed	above, o	describe	them bel	ow.		
Nc	ne												
	ere different er low.	nission r	ates use	d for sho	rt-term	and annı	ial mode	ling? If s	o describ	е	Yes□		No⊠

16-	16-L: NO ₂ Modeling					
1	Which types Check all tha	s of NO2 modeling were used? at apply.				
	\boxtimes	ARM2				
		100% NO _x to NO ₂ conversion				

		PVMRM					
		OLM					
		Other:					
2	Describe the	Describe the NO ₂ modeling.					
-	Both ROI and Cumulative analysis were run using ARM2						
3	Were default NO₂/NOx ratios (0.5 minimum, 0.9 maximum or equilibrium) used? If not Yes⊠ No□ describe and justify the ratios used below. Yes⊠ No□						
4	Describe the	Describe the design value used for each averaging period modeled.					
	1-hour: 98th	1-hour: 98th percentile as calculated by AERMOD					
	Annual: Hig	nest Annual Average of Three Years					

16-	M: Parti	culate Mat	ter Modeling					
	Select the pollutants for which plume depletion modeling was used.							
1	□ PM2.5							
		PM10						
	\boxtimes	None						
	Describe the	e particle size distr	ibutions used. Include the s	sourc	e of information.			
2								
3	Does the facility emit at least 40 tons per year of NOx or at least 40 tons per year of SO₂? Sources that emit at least 40 tons per year of NOx or at least 40 tons per year of SO₂ are considered to emit significant amounts of precursors and must account for secondary formation of PM2.5.					No⊠		
4	Was second	ary PM modeled f	or PM2.5?				Yes□	No⊠
	If MERPs were used to account for secondary PM2.5 fill out the information below. If another method was used describe below.							
5	NO _x (ton/yr)		SO ₂ (ton/yr)		[PM2.5] _{annual}		[PM2.5]24-hour	

16-	16-N: Setback Distances					
1	Portable sources or sources that need flexibility in their site configuration requires that setback distances be determined between the emission sources and the restricted area boundary (e.g. fence line) for both the initial location and future locations. Describe the setback distances for the initial location.					
	NA					

2

Describe the requested, modeled, setback distances for future locations, if this permit is for a portable stationary source. Include a haul road in the relocation modeling.

			, 2-C, 2-E, 2-F, and 2-I should match the ones in the		
	-	-	provide a cross-reference table between unit	Yes	No⊠
·	numbers if they do				
	Unit #	Model ID	Description		
	7		MA Plant		
	7	HMASTK	HMA Baghouse Stack		
	10	HMAHEAT	HMA Asphalt Cement Heater		
	8	DRUMUNL	HMA Asphalt Silo Loading		
	9	HMASILO	HMA Asphalt Silo Unloading		
	12	HMAGEN	HMA Generator		
	AGGPILE	HMAPILE1	HMA Storage Pile Handling 1		
	AGGPILE	HMAPILE2	HMA Storage Pile Handling 2		
	AGGPILE	HMAPILE3	HMA Storage Pile Handling 3		
	AGGPILE	HMAPILE4	HMA Storage Pile Handling 4		
	AGGPILE	HMAPILE5	HMA Storage Pile Handling 5		
	1	HMABIN1	HMA 1 Bin Loading (3 Bins)		
	1	HMABIN2	HMA 1 Bin Loading (3 Bins)		
	2	HMATP1	HMA Bin 1 Unloading		
	2	HMATP2	HMA Bin 2 Unloading		
	4	HMASCR	HMA Scalping Screen		
	5	HMATP3	HMA Scalping Screen Unloading		
	6	HMATP4	HMA Conveyor Transfer to Drum Conveyor		
	11	ASPHTANK	Asphalt Cement Storage Tank		
	13	HR_0001-0049	HMA Haul Road Volume 1-49		
	YARD	HR_0027-0049	HMA Yard		
		Crushing a	nd Screening Plant		
	12	GEN1	Crusher Generator 1		
	13	GEN2	Crusher Generator 2		
	RAW	RAW	Raw Material Piles		
	1	FEED	Feeder		
	2	TP1	Waste Conveyor		
	3	PCRSH	Primary Crusher		
	4	TP2	Primary Crusher Conveyor		
	5	SCRSH	Secondary Crusher		
	6	TP3	Secondary Crusher Conveyor		
	7	SCR	Screen		

	8	TP4	Screen Conveyo	or					
	9	TP5	Screen Conveyo						
	10	TP6	Screen Conveyo	or					
	11	STK1	Stacker Convey	or Drop to Pile					
	11	STK2	Stacker Convey	or Drop to Pile					
	11	STK3	Stacker Convey	or Drop to Pile					
	FPILE	FP	Finish Piles						
	14	CR_0001-0023	Crusher Haul Ro	ad Volume 1-23	3				
2	The emission rates in these match? If not,		2-F should match	the ones in the	modeling files. Do	Yes	\boxtimes	No□	
3	Have the minor NSR exempt sources or Title V Insignificant Activities" (Table 2-B) sources yes I ves No I ves N						No⊠		
	Which units consume increment for which pollutants?								
4	Unit ID	NO ₂	SO ₂ PM10				PM2.5		
-	NA								
5	PSD increment description for sources. (for unusual cases, i.e., baseline unit expanded emissions NA after baseline date).								
	Are all the actual installation dates included in Table 2A of the application form, as required? This is necessary to verify the accuracy of PSD increment modeling. If not please explain how increment consumption status is determined for the missing installation dates below.								

16-P: Flare Modeling							
1	For each flare or flaring scenario, complete the following						
	Flare ID (and scenario)	Average Molecular Weight	Gross Heat Release (cal/s)	Effective Flare Diameter (m)			
	NA						

16-	16-Q: Volume and Related Sources						
1	Were the dimensions of volume sources different from standard dimensions in the Air Quality Bureau (AQB) Modeling Guidelines? If not please explain how increment consumption status is determined for the missing installation dates below.	Yes□	No⊠				
	Describe the determination of sigma-Y and sigma-Z for fugitive sources.						

For storage piles the model inputs were based on the size of the pile (100 feet)/4.3 (sigma-Y) and a release height of 8 feet 2 or a sigma-Z of 8ft*2/2.15. All others followed standard dimensions from Air Quality Bureau (AQB) Modeling Guidelines. Describe how the volume sources are related to unit numbers. Or say they are the same. Unit # Model ID Description **HMA Plant** AGGPILE HMAPILE1 HMA Storage Pile Handling 1 AGGPILE HMAPILE2 HMA Storage Pile Handling 2 AGGPILE HMAPILE3 HMA Storage Pile Handling 3 AGGPILE HMAPILE4 HMA Storage Pile Handling 4 AGGPILE HMAPILE5 HMA Storage Pile Handling 5 1 HMABIN1 HMA 1 Bin Loading (3 Bins) 1 HMABIN2 HMA 1 Bin Loading (3 Bins) 2 HMATP1 HMA Bin 1 Unloading 2 HMATP2 HMA Bin 2 Unloading 4 HMASCR HMA Scalping Screen 5 HMATP3 HMA Scalping Screen Unloading 6 HMATP4 HMA Conveyor Transfer to Drum Conveyor 11 ASPHTANK Asphalt Cement Storage Tank 13 3 HR 0001-0049 HMA Haul Road Volume 1-49 YARD HR 0027-0049 HMA Yard **Crushing and Screening Plant** RAW RAW **Raw Material Piles** 1 Feeder FEED 2 Waste Conveyor TP1 3 **Primary Crusher** PCRSH 4 Primary Crusher Conveyor TP2 5 Secondary Crusher SCRSH 6 Secondary Crusher Conveyor TP3 7 SCR Screen 8 Screen Conveyor TP4 9 Screen Conveyor TP5 10 Screen Conveyor TP6 11 STK1 Stacker Conveyor Drop to Pile 11 STK2 Stacker Conveyor Drop to Pile 11 STK3 Stacker Conveyor Drop to Pile FPILE FP **Finish Piles** 14 CR 0001-0023 Crusher Haul Road Volume 1 Describe any open pits.

4	None
5	Describe emission units included in each open pit.
	NA

16-	R: Backg	round Concentrations					
	used below.	Were NMED provided background concentrations used? Identify the background station used below. If non-NMED provided background concentrations were used describe the data Yes No that was used. No No No No					
	CO: Del Norte	e High School (350010023)					
	NO ₂ : N/A						
1	PM2.5: Santa Fe (350490020)						
	PM10: Santa Fe (350490020)						
	SO ₂ : N/A						
	Other:						
	Comments: For NO2 1-Hour and Annual, and SO2 1-Hour averaging periods modeling only neighboring sources were included as discussed in Table 20. Facility location is outside the city of Las Vegas						
2	Were backgr	ound concentrations refined to monthly or hourly values? If so describe below.	Yes□	No⊠			

16-	16-S: Meteorological Data					
1	Was NMED provided meteorological data used? If so select the station used. Santa Fe 2017 - 2021	Yes⊠	No□			
2	If NMED provided meteorological data was not used describe the data set(s) used below. Discu handled, how stability class was determined, and how the data were processed.	iss how missing	data were			

16-T: Terrain						
1	Was complex terrain used in the modeling? If not, describe why below.	Yes⊠	No□			
	Yes, for point sources only. For volume sources, model was run in source selected flat terrain mode.					
2	What was the source of the terrain data?					
2	USGS National Elevation Data (NED)					

16	-U: Modeling Files							
	Describe the modeling files:							
	File name (or folder and file name)	Pollutant(s)	Purpose (ROI/SIA, cumulative, culpability analysis, other)					
	Shortline Combustion ROI	NOx, CO, SO2	ROI					
	Shortline PM ROI	PM10, PM2.5	ROI					
	Shortline NO2 1Hour	NO2	cumulative					
	Shortline NO2 Annual	NO2	cumulative					
	Shortline PM10	PM10	cumulative					
1	Shortline PM25 24Hr	PM2.5	cumulative					
	Shortline PM25 Yr	PM2.5	cumulative					
	Shortline SO2 1Hour	SO2	cumulative					
	Shortline H2S	H2S	ROI					
	Shortline PM10 Setback	PM10	setback					
	Shortline PM25 24 Hr Setback	PM25	setback					
	Shortline PM25 Annual Setback	PM25	setback					
	Shortline NO2 Annual Setback	NO2	setback					
	Shortline NO2 1 Hour Setback	NO2	setback					
	Shortline SO2 Setback	SO2	setback					

16-	16-V: PSD New or Major Modification Applications						
1	A new PSD major source or a major modification to an existing PSD major source requires additional analysis. Was preconstruction monitoring done (see 20.2.74.306 NMAC and PSD Preapplication Guidance on the AQB website)?	Yes□	No⊠				
2	If not, did AQB approve an exemption from preconstruction monitoring?	Yes□	No⊠				
3	Describe how preconstruction monitoring has been addressed or attach the approved preconstruction monitoring or monitoring exemption.						
	Not a PSD Source						
4	Describe the additional impacts analysis required at 20.2.74.304 NMAC.						
-	Not a PSD Source						
5	If required, have ozone and secondary PM2.5 ambient impacts analyses been completed? If so describe below.	Yes□	No⊠				
	Not a PSD Source						

16-W: Modeling Results										
1	require signific	If ambient standards are exceeded because of surrounding sources, a culpability analysis is required for the source to show that the contribution from this source is less than the significance levels for the specific pollutant. Was culpability analysis performed? If so describe below.					Yes□	No⊠		
2	 Identify the maximum concentrations from the modeling analysis. Rows may be modified, added and removed from the table below as necessary. 									
Pollutant, Time Period	Modeled Facility	Modeled leled Concentratio	Secondary	Background	Cumulative	Value of	Percent	Location		
and Standard	Concentrati Surrounding on (μg/m3) Sources (μg/m3)	ΡΜ (μg/m3)	Concentratio n (µg/m3)	Concentratio n (μg/m3)	Standard (μg/m3)	of Standard	UTM E (m)	UTM N (m)	Elevation (ft)	
NO2 1 hr	182.8	182.8	NA	NA	182.8	188.0	97.2	482220.6	3943006.9	1982.99
NO2 ann	14.0	1.0	NA	NA	15.0	94.0	16.0	482164.9	3942934.2	1982.40
CO 1 hr	607.0	NA	NA	NA	607.0	SIL - 2000	30.4	482133.9	3943095.8	1982.43
CO 8 hr	219.8	NA	NA	NA	219.8	SIL - 500	44.0	482206.6	3942988.7	1983.00
SO2 1 hr	77.5	77.5	NA	NA	77.5	196.4	39.5	482100.0	3943100.0	1985.32
PM2.5 24 hr	7.5	7.7	NA	9.2	17.0	35.0	48.3	482262.3	3943061.5	1983.54
PM2.5 ann	3.6	3.9	NA	3.7	7.6	12.0	63.3	482234.5	3943025.1	1983.29
PM10 24 hr	64.3	68.3	NA	19.0	87.3	150.0	58.2	482113.9	3942854.9	1981.59
H2S 1 hr	0.24	NA	NA	NA	0.24	SIL - 1.0	24.0	482176.8	3943113.0	1985.74
Asphalt Fumes 8 hr	13.28	13.28	NA	NA	13.28	50	26.6	482262.3	3943061.5	1985.73

16	16-X: Summary/conclusions				
	A statement that modeling requirements have been satisfied and that the permit can be issued.				
1	Dispersion modeling was performed for the new Las Vegas HMA & Crusher permit applications. All facility pollutants with				
	ambient air quality standards were modeled to show compliance with those standards. All results of this modeling showed				
	the facility in compliance with applicable ambient air quality standards.				

Change Log – Do **not** submit this page with your application.

If you are using a form older than the most current form posted on the website, you are required to incorporate the changes listed. Periodically, AQB will announce when older form versions will no longer be accepted.

Version Date	Changes Incorporated
8/31/2020	Older versions of form this form will not be accepted.
7/12/2023	Changed font to Calibri