**Draft-Statement of Basis - Narrative**

NSR Permit

**Type of Permit Action:** Regular-New

**Facility: Veguita South Crusher Plant**

**Company:** Castillo Prestress

**Permit No(s).**: 9218

**Tempo/IDEA ID No.:** 39993 - PRN20210001

**Permit Writer:** Joseph Mashburn

**Fee Tracking (not required for Title V)**

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| --- | --- |
| **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 6/29/2021 |

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| --- | --- | --- |
| **Permit Review** | **Date to Enforcement:** N/A | **Date of Enforcement Reply:** N/A |
| **Date to Applicant:** TBD | **Date of Applicant Reply:** TBD |
| **Date to EPA:** N/A | **Date of EPA Reply:** N/A |
| **Date to Supervisor:** 8/2/2021 | |

1. **Plant Process Description:**

Castillo Prestress will operate the Veguita South Crusher Plant, which is a sand/gravel/rock (aggregate) crushing facility consisting of feeders, deck screens, crushers, a wash plant and conveyors. The facility will be permitted to operate with a production limit of 300 tons per hour and 1,314,000 tons per year. The requested annual hours of operation are 3,744 hours per year. The daily and maximum operating hours and schedule are from 6 am to 6 pm 6 days a week and 52 weeks per year. The plant is powered by line power. No generator engines are required and are therefore not included in this application. The facility will operate only during daylight hours.

A front-end loader dumps aggregate into the feeder/surge bin and directly into the jaw crusher. From the feeder, material is transferred by conveyor to a deck screen. The usable material is then transferred via conveyor to the cone crusher. The crushed material is then transferred via conveyor to another screen. The screened material (various sizes) is then transferred via conveyor to the stockpiles. Material is transported off site by trucks. Fugitive dust generated during aggregate processing will be controlled by the inherent moisture content of the material and water spray bars. The plant is powered by line power.

1. **Description of this Modification:**

This is a new facility.

1. **Source Determination:**

1. The emission sources evaluated include the entire Veguita South Crusher Plant.

2. Single Source Analysis:

* 1. SIC Code: Do the facilities belong to the same industrial grouping (i.e., same two-digit SIC code grouping, or support activity)? **Yes**
  2. Common Ownership or Control: Are the facilities under common ownership or control? **Yes**
  3. 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**

1. **PSD Applicability:**
2. The source, as determined in 3.0 above, is a minor source.

| 1. **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)** |
| 9218 | TBD | New NSR | Issue a new NSR permit. |

1. **Public Response/Concerns:** As of July 26, 2021, or the issuance date of this permit, this permit writer is aware of limited public comment. The Bureau has received one written comment and two individuals have called in with questions, regarding this current permitting action.

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| 1. **Compliance Testing:** Not applicable for a new facility with no record of testing so far. |

1. **Startup and Shutdown:**
   1. 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**
   2. 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**
   3. 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**
   4. Does the facility have emissions due to routine or predictable startup, shutdown, and maintenance? No. If so, have all emissions from startup, shutdown, and scheduled maintenance operations been permitted? **N/A**
2. **Compliance and Enforcement Status:**  Per 7/30/2021 email from Teri Waldron, “There is no outstanding notice of violation and no settlement agreement for which all actions have not been completed. Conditions from a settlement agreement, or any other applicable requirements, do not need to be included in the NSR permit.”
3. **Modeling:** As of July 26, 2021, Angela Raso is in the process of reviewing the submitted modeling from the applicant and the results are pending. Air dispersion modeling was performed by the applicant for this project to show compliance with the NMAAQS.

When the modeling review summary is complete, the results will be updated here.

1. **State Regulatory Analysis(NMAC/AQCR**)**:**

| **Citation**  **20**  **NMAC** | **Title** | **Applies**  **(Y/N)** | **Unit(s) or Facility** | **Justification:** |
| --- | --- | --- | --- | --- |
| **2.1** | General Provisions | Y | Entire 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 | Y | Entire Facility | **NSR:** 20.2.3 NMAC is a SIP approved regulation that limits the maximum allowable concentration of Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide.  The TSP NM ambient air quality standard was repealed by the EIB effective November 30, 2018.  **Air dispersion modeling was performed for this project to show compliance with the NMAAQS. See form UA4 for a discussion and the results of the air dispersion modeling.** |
| **2.7** | Excess Emissions | Y | Entire Facility | Applies to all facilities' sources |
| **2.61.109** | Smoke and Visible Emissions | N |  | 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).  There are no combustion sources at this facility. |
| **2.70** | Operating Permits | N |  | The facility is not a Title V Major Source as defined at 20.2.70.7 NMAC. |
| **2.71** | Operating Permit Fees | N |  | The facility is not a Title V Major Source as defined at 20.2.70.7 NMAC. |
| **2.72** | Construction Permits | Y | Entire Facility | NSR Permits are the applicable requirement, including 20.2.72 NMAC. Potential emission rate (PER) for the facility is greater than 10 pph or greater than 25 tpy for any pollutant subject to a state or federal ambient air quality standard. |
| **2.73** | NOI & Emissions Inventory Requirements | Y | Entire Facility | Applicable to all facilities that require a permit.  Emissions Inventory Reporting: 20.2.73.300 NMAC applies. |
| **2.74** | Permits-Prevention of Significant Deterioration | N |  | This facility is not a PSD major source. |
| **2.75** | Construction Permit Fees | Y | Entire Facility | This facility is subject to 20.2.72 NMAC and is in turn subject to 20.2.75 NMAC. |
| **2.77** | New Source Performance Standards | Y | See Sources subject to 40 CFR 60 | Applies to any stationary source constructing or modifying and which is subject to the requirements of 40 CFR Part 60. |
| **2.78** | Emissions Standards for HAPs | N |  | This facility does not emit hazardous air pollutants which are subject to the requirements of 40 CFR Part 61. |
| **2.79** | Permits – Nonattainment Areas | No | Facility | This facility is NOT located in a nonattainment Area. |

1. **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 | Y | Entire Facility | Independent of permit applicability; applies to all sources of emissions for which there is a Federal Ambient Air Quality Standard. |
| NSPS Subpart A  (40 CFR 60) | General Provisions | Y | See sources subject to a Subpart in 40 CFR 60 | Applies if any other subpart applies. Subpart OOO in 40 CFR 60 applies. |
| 40 CFR 60 Subpart OOO | Standards of Performance for **Nonmetallic Mineral Processing Plants** | Y | Crushers 6, 7 and 8; Screens 9 and 10; and Conveyors 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, and 48 | NSPS standards for non-metallic minerals processing plants apply to each applicable crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station. This facility has crushers, screens, and conveyors applicable under this subpart, and Castillo Prestress will comply with any applicable requirements of Subpart OOO. |
| 40 CFR Part 60 Subpart IIII (Quad-I) | Standards of Performance for Stationary Compression Ignition Internal Combustion Engines | N |  | The provisions of this subpart are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE). There are no compression ignition engines at this facility. The facility will use commercial Line Power entirely. |
| 40 CFR Part 60 Subpart JJJJ (Quad-J) | Standards of Performance for Stationary Spark Ignition Internal Combustion Engines | N |  | See 40 CFR 60.4230 and EPA Region 1’s Reciprocating Internal Combustion Guidance website. There are no engines at this facility. The facility will use commercial Line Power entirely. |

1. **Exempt and/or Insignificant Equipment that do not require monitoring**: NONE

The applicant does not list any NSR Exempt Equipment in Table 2B of the UA2 excel workbook.

1. **Permit specialist’s notes to other NSR or Title V permitting staff concerning changes and updates to permit conditions.**

* 1. This is a draft Statement of Basis that will be updated as needed, during managerial review and any updates from Applicant.