STATE OF NEW MEXICO
COUNTY OF LINCOLN
TWELFTH JUDICIAL DISTRICT

DALE A. ANTILLA, et. al.,

Plaintiffs,

v. No. D-1226-CV-2021-00241
(consolidated with)

ROPER CONSTRUCTION, INC.

Defendant,

and

JAMES A. MILLER, SARAH L. MILLER and
JOSHUA C. BOTKIN,

Plaintiffs/Counter-Defendants,

v. No. D-1226-CV-2021-00261

ROPER CONSTRUCTION, INC. and
ROPER INVESTMENTS, LLC,

Defendants/Counter-Plaintiffs.

NOTICE OF NMED DECISION IN RELATED PROCEEDING

Defendant Roper Construction, Inc. ("Roper") hereby provides notice that the Air Quality Bureau within the Environmental Protection Division of the New Mexico Environment Department ("NMED") has approved Roper's revised air quality permit application, in advance of the scheduled October 18, 2022 hearing before the New Mexico Environmental Improvement Board to address Roper's objections to / appeal of the NMED's May 2022 denial of Air Quality Permit No. 9295. A copy of the approved revised NMED draft permit, No. 9295 Version 2022-10-3, is attached herewith. NMED has further taken the position in the appeal that Roper's previous draft air quality permit complied with all applicable state and federal requirements for approval,

and otherwise generally agreed with Roper's statement of objections to the May 2022 denial. *See* NMED Answer to Petition. All briefing by the parties concerning the appeal can be found at https://www.env.nm.gov/opf/docketed-matters/ - Environmental Improvement Board folder - *EIB 22-34: In the Matter of the Petition for Hearing on Air Quality Permit No. 9295, Roper Construction Inc.'s Alto Concrete Batch*.

Respectfully submitted,

MONTGOMERY & ANDREWS, P.A.

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CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2022, the foregoing was filed electronically with the Court' s electronic filing system, with a copy electronically served on the following:

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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-A: Identification

1	Name of facility:	Alto Concrete Batch Plant
2	Name of company:	Roper Construction, Inc
3	Current Permit number:	New Permit #9295
4	Name of applicant's modeler:	Paul Wade
5	Phone number of modeler:	(505) 830-9680 ext6
6	E-mail of modeler:	pwade@montrose-env.com

16-B: Brief

1	Was a modeling protocol submitted and approved? Original Submitted 04/18/2021; No Approval; This is revised modeling for site layout change.	Yes☒	No☐
2	Why is the modeling being done?	Moving Equipment	
3	Describe the permit changes relevant to the modeling.		
	Revised modeling will address reduction in daily throughput and reduction in daily operation hours.		
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 facility is located	153	
8	List the PSD baseline dates for this region (minor or major, as appropriate).		
	NO2	08/02/1995	
	SO2	N/A	
	PM10	06/16/2000	
	PM2.5	N/A	
9	Provide the name and distance to Class I areas within 50 km of the facility (300 km for PSD permits).		
	White Mountain Wilderness Area, 1.91 kilometers		
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.		
	None		

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).

1	Pollutant	Latest permit and modification number that modeled the pollutant facility-wide.	Date of Permit	Comments
	CO			New Permit – No Previous Modeling
	NO_2			New Permit – No Previous Modeling
	SO_2			New Permit – No Previous Modeling
	H_2S			Not Emitted
	PM2.5			New Permit – No Previous Modeling
	PM10			New Permit – No Previous Modeling
	Lead			None
	Ozone (PSD only)			Not a PSD Permit
	NM Toxic Air Pollutants (20.2.72.402 NMAC)			Not Emitted

16-D: Modeling performed for this application

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.

1	Pollutant	ROI	Cumulative analysis	Culpability analysis	Waiver approved	Pollutant not emitted or not changed.
	CO	☒	☐	☐	☐	☐
	NO_2	☒	☒	☐	☐	☐
	SO_2	☒	☐	☐	☐	☐

	H_2S	☐	☐	☐	☐	☒
	PM2.5	☒	☒	☐	☐	☐
	PM10	☒	☒	☐	☐	☐
	Lead	☐	☐	☐	☐	☒
	Ozone	☐	☐	☐	☐	☒
	State air toxic(s) (20.2.72.402 NMAC)	☐	☐	☐	☐	☒

16-E: New Mexico toxic air pollutants modeling

1	List any New Mexico toxic air pollutants (NMTAPs) from Tables A and B in 20.2.72.502 NMAC that are modeled for this application. None

2 List any NMTAPs that are emitted but not modeled because stack height correction factor. Add additional rows to the table below, if required.

Pollutant	Emission Rate (pounds/hour)	Emission Rate Screening Level (pounds/hour)	Stack Height (meters)	Correction Factor	Emission Rate/ Correction Factor

16-F: Modeling options

1	Was the latest version of AERMOD used with regulatory default options? If not explain below.	Yes☒	No☐
	For volume sources were processed in flat terrain mode.		

16-G: Surrounding source modeling

1	Date of surrounding source retrieval	March 16, 2021

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.

AQB Source ID	Description of Corrections

16-H: Building and structure downwash

1	How many buildings are present at the facility?	1 - Office
2	How many above ground storage tanks are present at the facility?	1 – Cement/Fly Ash Storage Silo

3	Was building downwash modeled for all buildings and tanks? If not explain why below.	Yes☒	No☐
4	Building comments		

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.		
	Site is fenced on all sides of the facility with gates at entrances.		
2	Receptors must be placed along publicly accessible roads in the restricted area. Are there public roads passing through the restricted area?	Yes☐	No☒
3	Are restricted area boundary coordinates included in the modeling files?	Yes☒	No☐

4 Describe the receptor grids and their spacing. The table below may be used, adding rows as needed.

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	Cartesian	25	0	250 meters	
Very fine	Cartesian	50	250	500 meters	
Fine	Cartesian	100	500 meters	1000 meters	
Course	Cartesian	250	1000 meters	3000 meters	

5	Describe receptor spacing along the fence line. 25 meters
6	Describe the PSD Class I area receptors. 100 meters spacing across east side of White Mountain Wilderness Area

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 there likely to be public comments opposing the permit application?	Yes☐	No☒

16-K: Modeling Scenarios

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).

1

The concrete batch plant will limit hourly processing rate to 125 cubic yard per hour and 500,000 cubic yard per year. The hours of operation are presented below in Table 1. Seasonal daily throughputs are presented in Table 2.

TABLE 1: CBP Plant Hours of Operation (MST)

	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	1	0	0	0
6:00 AM	0	0	1	1	1	1	1	1	1	1	0	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	0	1	1	1	1	1	1	1	1	0	0
6:00 PM	0	0	0	1	1	1	1	1	1	0	0	0
7:00 PM	0	0	0	0	0	0	0	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	10	12	14	14	14	14	14	14	12	10	10

TABLE 2: HMA Daily Production Rates and Corresponding Max Hours of Production

Month	Cubic Yards Per Day	At Max Hourly Throughput – Hours per Day
November - February	750	6
March, October	750	6
April - September	750	6

Table 3 presents the 3 model scenarios modeled hours for showing compliance with the worst-case operating scenario.

TABLE 3: HMA Model Scenario Time Segments - Particulate

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

2 Which scenario produces the highest concentrations? Why?

PM10 – Scenario 1 – Year 2019, low wind speed.
PM2.5 - Scenario 1 – Year 2016, low wind speed.

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:

5

Hour of Day	Factor	Hour of Day	Factor								
1		13									
2		14									
3		15									
4		16									
5		17									
6		18									
7		19									
8		20									
9		21									
10		22									
11		23									
12		24									

	If hourly, variable emission rates were used that were not described above, describe them below.		
6	Were different emission rates used for short-term and annual modeling? If so describe below.	Yes☒	No☐
	An hourly factor was used for the PM2.5 annual averaging period. If based on all hours of operation the maximum annual production rate would be 273,750 cubic yards. Since the annual throughput will be limited to 50,000 cubic yards a factor of 0.18 for all hours of operations will reduce the annual modeled emissions to proposed maximum annual emission rates. (50,000 cy/yr / 273,750 cy/yr = 0.18)		

16-L: NO_2 Modeling

1	Which types of NO_2 modeling were used? Check all that apply.	
	☒	ARM2
	☐	100% NO_X to NO_2 conversion
	☐	PVMRM
	☐	OLM
	☐	Other:
2	Describe the NO_2 modeling.	
	ARM2 for both 1-hour and annual averaging period modeling. All ARM2 default values were used.	
3	Were default NO_2/NO_X ratios (0.5 minimum, 0.9 maximum or equilibrium) used? If not describe and justify the ratios used below.	Yes☒ No☐
4	Describe the design value used for each averaging period modeled.	
	1-hour: 98th percentile as calculated by AERMOD Annual: One Year Annual Average	

16-M: Particulate Matter Modeling

1	Select the pollutants for which plume depletion modeling was used.	
	☐	PM2.5
	☒	PM10
	☐	None
2	Describe the particle size distributions used. Include the source of information.	

Representative average particle densities were obtained from NMED accepted values.

Material	Density (g/cm^3)	Reference
Road Dust – Roper Construction	2.5	NMED Value
Cement – Roper Construction	3.3	NMED Value

Fly Ash – Roper Construction	1.04	NMED Value
Combustion – Roper Construction and Neighbor	1.5	NMED Value
Fugitive Dust – Roper Construction and Neighbor	2.5	NMED Value

The densities and size distribution for PM_{10} emission sources are presented in Tables 4 - 8.

TABLE 4: Unpaved Road Vehicle Fugitive Dust Depletion Parameters

Particle Size Category (μm)	Mass Mean Particle Diameter (μm)	Mass Weighted Size Distribution (%)	Density (g/cm^3)
PM10			
0 – 2.5	1.57	25.0	2.5
2.5 – 10	6.91	75.0	2.5

Based on NMED Particle Size Distribution Spreadsheet – April 25, 2007

TABLE 5: Cement Baghouse Source Depletion Parameters

Particle Size Category (μm)	Mass Mean Particle Diameter (μm)	Mass Weighted Size Distribution (%)	Density (g/cm^3)
PM10			
0-2.5	1.57	25	3.3
2.5-10	6.91	75	3.3

Parameters based on baghouse exhaust capture percentages.

TABLE 6: Fly Ash Baghouse Source Depletion Parameters

Particle Size Category (μm)	Mass Mean Particle Diameter (μm)	Mass Weighted Size Distribution (%)	Density (g/cm^3)
PM10			
0-2.5	1.57	25	3.3
2.5-10	6.91	75	3.3

Parameters based on baghouse exhaust capture percentages

TABLE 7: Combustion Source Depletion Parameters

Particle Size Category (μm)	Mass Mean Particle Diameter (μm)	Mass Weighted Size Distribution (%)	Density (g/cm^3)
PM10			
0 - 2.5	1.57	100	1.5

Based on NMED Particle Size Distribution Spreadsheet – April 25, 2007

TABLE 8: Fugitive Dust Source Depletion Parameters

Particle Size Category (μm)	Mass Mean Particle Diameter (μm)	Mass Weighted Size Distribution (%)	Density (g/cm^3)
PM10			
2.5 – 5	3.88	22.6	2.5
5 – 10	7.77	77.4	2.5

Parameters based on values from the Albuquerque Air Quality Division Modeling Guidelines.

3	Does the facility emit at least 40 tons per year of NO_X or at least 40 tons per year of SO_2? Sources that emit at least 40 tons per year of NO_X or at least 40 tons per year of SO_2 are considered to emit significant amounts of precursors and must account for secondary formation of PM2.5.	Yes☐	No☒
4	Was secondary PM modeled for PM2.5?	Yes☐	No☒

5 If MERPs were used to account for secondary PM2.5 fill out the information below. If another method was used describe below.

NO_X (ton/yr)	SO_2 (ton/yr)	$[PM2.5]_{annual}$	$[PM2.5]_{24\text{-}hour}$

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.
	Permanent Site
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.
	N/A

16-O: PSD Increment and Source IDs

1	The unit numbers in the Tables 2-A, 2-B, 2-C, 2-E, 2-F, and 2-I should match the ones in the modeling files. Do these match? If not, provide a cross-reference table between unit numbers if they do not match below.	Yes☐	No☒

Unit Number in UA-2	Unit Number in Modeling Files
Concrete Plant Truck Load Baghouse (Unit 7,8)	TMBH
Concrete Plant Cement Silo Baghouse (Unit 9)	CSBH
Concrete Plant Fly Ash Baghouse (Unit 10)	FASBH

	Concrete Batch Plant Heater (Unit 12)	CBPH
	Feed Hopper Loading (Unit 2)	FH
	Feed Hopper Unloading to Conveyor (Unit 3)	TP
	Aggregate Bin Loading (Unit 4)	AB
	Aggregate Weigh Batcher and Conveyor (Unit 5,6)	WH
	Storage Piles (Aggregate) (Unit 11)	SP1
	Storage Piles (Aggregate) (Unit 11)	SP2
	Storage Piles (Aggregate) (Unit 11)	SP3
	Storage Piles (Sand) (Unit 11)	SP4
	Storage Piles (Sand) (Unit 11)	SP5
	Storage Piles (Sand) (Unit 11)	SP6
	Aggregate Haul Trucks Volume 1 (Unit 1)	AGG_0001 – 25 One Way
	Concrete Cement Fly Ash Haul Trucks Volume1 (Unit 1)	CON_0001 – 7 Round Trip

2 The emission rates in the Tables 2-E and 2-F should match the ones in the modeling files. Do these match? If not, explain why below. Yes☐ No☒

Hourly model emission rates for material handling sources (Emissions calculated using AP-42 Section 13.2.4) are calculated using annual average windspeed for Ruidoso 1996 - 2006. Mineral filler silo modeled emission rate is based on the hourly usage (3 tons/hr) times the silo baghouse particulate emission factor.

Emission Point #	Process Unit Description	PM10 lbs/hr	PM2.5 lbs/hr
FH	Feed Hopper Loading (Unit 2)	0.27369	0.04144
SP1	Storage Piles (Aggregate) (Unit 11)	0.05970	0.00904
SP2	Storage Piles (Aggregate) (Unit 11)	0.05970	0.00904
SP3	Storage Piles (Aggregate) (Unit 11)	0.05970	0.00904
SP4	Storage Piles (Sand) (Unit 11)	0.05970	0.00904
SP5	Storage Piles (Sand) (Unit 11)	0.05970	0.00904
SP6	Storage Piles (Sand) (Unit 11)	0.05970	0.00904
CSBH	Concrete Plant Cement Silo Baghouse (Unit 9)	0.01436	0.00331
FASBH	Concrete Plant Fly Ash Baghouse (Unit 10)	0.00908	0.00209

3 Have the minor NSR exempt sources or Title V Insignificant Activities" (Table 2-B) sources been modeled? Yes☐ No☒

4 Which units consume increment for which pollutants?

Unit ID	NO_2	SO_2	PM10	PM2.5
TMBH			X	
CSBH			X	
FASBH			X	
CBPH	X		X	
FH			X	
TP			X	
AB			X	
WH			X	
SP1			X	

	SP2			X	
	SP3			X	
	SP4			X	
	SP5			X	
	SP6			X	
	AGG_0001 - 25			X	
	CON_0001 - 7			X	

5	PSD increment description for sources. (for unusual cases, i.e., baseline unit expanded emissions after baseline date).	Baseline unit expanded emissions after minor baseline date

6	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.	Yes☐	No☒
	Facility has not been installed. Is a new facility that will consume increment for NO_2 and PM_{10}		

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-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☒
	Volume sources for storage piles are based on 8 feet release height and 50 feet width.		
2	Describe the determination of sigma-Y and sigma-Z for fugitive sources.		
	For storage piles, the model inputs were based on the size (50 feet) of the pile/4.3 (sigma-Y) and a release height of 8 feet or a sigma-Z of 8ft*2/2.15. All others followed standard dimensions from Air Quality Bureau (AQB) Modeling Guidelines.		
3	Describe how the volume sources are related to unit numbers. Or say they are the same.		

Model ID	Source Description
TMBH	Concrete Plant Truck Load Baghouse (Unit 7,8)
CSBH	Concrete Plant Cement Silo Baghouse (Unit 9)
FASBH	Concrete Plant Fly Ash Baghouse (Unit 10)
CBPH	Concrete Batch Plant Heater (Unit 12)

FH	Feed Hopper Loading (Unit 2)	
TP	Feed Hopper Unloading to Conveyor (Unit 3)	
AB	Aggregate Bin Loading (Unit 4)	
WH	Aggregate Weigh Batcher and Conveyor (Unit 5,6)	
SP1	Storage Piles (Aggregate) (Unit 11)	
SP2	Storage Piles (Aggregate) (Unit 11)	
SP3	Storage Piles (Aggregate) (Unit 11)	
SP4	Storage Piles (Sand) (Unit 11)	
SP5	Storage Piles (Sand) (Unit 11)	
SP6	Storage Piles (Sand) (Unit 11)	
AGG_0001-0025	Aggregate Haul Trucks (Unit 1)	
CON_0001-0007	Concrete Cement Fly Ash Haul Trucks (Unit 1)	

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

16-R: Background Concentrations

1	Were NMED provided background concentrations used? Identify the background station used below. If non-NMED provided background concentrations were used describe the data that was used.	Yes☒	No☐
	CO: Del Norte High School (350010023)		
	NO_2: Outside Carlsbad (350151005)		
	PM2.5: Las Cruces Distric Office (350130025)		
	PM10: Las Cruces City Well #46 (350130024)		
	SO_2: Bloomfield(350450009)		
	Other:		
	Comments:		
2	Were background concentrations refined to monthly or hourly values? If so describe below.	Yes☐	No☒

16-S: Meteorological Data

1	Was NMED provided meteorological data used? If so select the station used.	Yes☐	No☒
2	If NMED provided meteorological data was not used describe the data set(s) used below. Discuss how missing data were handled, how stability class was determined, and how the data were processed.		
	Dispersion model meteorological input files were created from meteorological data collected at Holloman AFB, NM for the years 2016 - 2020, about 45 miles south-southwest from the site. The similar elevation, topography, terrain, vegetation, and		

climate of both sites make this meteorological data representative of the model area. Figure 3 shows wind rose diagram of the meteorological wind speed versus direction data that has been collected for the years 2016 - 2020.

AERMET wind speed threshold for surface data is 0.5 meters per second.

Santa Teresa Airport 2016-2020 data was used for upper air.

Since the meteorological input data does not include turbulence data, the adjust U* option in AERMET was used during processing of the meteorological data.

AERMET/AERMOD requires that several additional parameters be input during data processing in AERMET:

- Surface roughness length (m)
- Albedo
- Bowen Ratio

The surface roughness length influences the surface shear stress and is an important factor in determining the magnitude of mechanical turbulence and the stability of the boundary layer. The albedo is the fraction of total incident solar radiation reflected by the surface back to space without absorption. The daytime Bowen ratio, an indicator of surface moisture, is the ratio of sensible heat flux to latent heat flux and, together with albedo and other meteorological observations, is used for determining planetary boundary layer parameters for convective conditions driven by the surface sensible heat flux.

These parameters would be obtained using AERSURFACE (*Version 20060*). AERSURFACE requires the input of land cover data from the U.S. Geological Survey (USGS) National Land Cover Data (NLCD) 2016 archives, which it uses to determine the land cover types for the Alamogordo airport-specified location. AERSURFACE matches the 2016 NLCD land cover categories to seasonal values of albedo, Bowen ratio, and surface roughness. Values of surface characteristics are calculated based on the land cover data for the study area and output in a format for input into AERMET Stage 3.

Site descriptive questions required by AERSURFACE include:

- Meteorological data from airport
- Continuous snowcover for a month in winter
- Arid climate
- Dry climate

For the Holloman AFB meteorological data, YES was checked for airport data, NO was checked for continuous snowcover in winter, YES was checked for arid climate, and YES was checked for dry climate. For each parameter, data was extracted from land cover data for each month of the year and 12 equal sectors radiating from the Alamogordo Airport.

The meteorological data was processed using AERMET (*Version 19191)* and upper air from Santa Teresa Airport for the same time period. The upper air and surface data are considered to be representative and comparable with both the Holloman AFB and Roper Construction's Alto CBP site. The Holloman AFB meteorological data files, Santa Teresa upper air files, and Holloman AFB surface air file are submitted to the NMED-AQB Modeling Section for review with this modeling protocol.

No missing hours were substituted.

16-T: Terrain

1	Was complex terrain used in the modeling? If not, describe why below.	Yes☒	No☐

2	What was the source of the terrain 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)
1	RoperAltaCombustionROI	CO, NO2, SO2	ROI
	RoperAltaPMROIS1-5	PM10, PM2.5	ROI
	RoperAltaCIANO21Hr	NO2	Cumulative
	RoperAltaCIAPM10dS1-5	PM10 24 Hour and Annual Increment	Cumulative, PSD Class II Increment
	RoperAltaCIAPM25_24S1-5	PM2.5 24 Hour	Cumulative
	RoperAltaCIAPM25_YrS1-5	PM2.5 Annual	Cumulative
	RoperAltaNO2IncSIL	NO2	Class I Increment SIL
	RoperAltaPM10dS1IncSIL – S5	PM10	Class I Increment SIL
	RoperAltaPM10dS1Inc – S5	PM10 24 Hour and Annual	Class I Increment Cumulative

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.		
	NA		
4	Describe the additional impacts analysis required at 20.2.74.304 NMAC.		
	NA		
5	If required, have ozone and secondary PM2.5 ambient impacts analyses been completed? If so describe below.	Yes☐	No☒
	Total facility emissions of NO2, SO2, and VOC are all less than <1.0 tons per year		

16-W: Modeling Results

1	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 and Standard	Modeled Facility Concentration (µg/m3)	Modeled Concentration with Surrounding Sources (µg/m3)	Secondary PM (µg/m3)	Background Concentration (µg/m3)	Cumulative Concentration (µg/m3)	Value of Standard (µg/m3)	Percent of Standard	Location		
								UTM E (m)	UTM N (m)	Elevation (ft)
NO_2 1 Hour H8H	16.1	-	-	38.7	54.8	188.03	29.1	438227.4	3697886.7	2209.64
NO_2 Annual H1H	0.96	-	-	-	-	SIL-1	96.0	438323.1	3697946.9	-
NO_2 Annual Class II	0.96	-	-	-	-	SIL-1	96.0	438323.1	3697946.9	-
NO_2 Annual Class I	0.0052	-	-	-	-	SIL-0.1	52.0	437055.0	3699583.7	-
CO 1 Hour H1H	41.4	-	-	-	-	SIL-2000	2.1	438160.0	3697961.5	-
CO 8 Hour H1H	8.69	-	-	-	-	SIL-500	1.7	438150.0	3697950.0	-
SO_2 1 Hour H1H	0.53	-	-	-	-	SIL-7.8	6.8	438160.0	3697961.5	-
SO_2 3 Hour H1H	0.20	-	-	-	-	SIL-25	0.8	438325.0	3697950.0	-
SO_2 24 Hour H1H	0.07	-	-	-	-	SIL-5	1.4	438251.6	3697885.1	-
SO_2 Annual H1H	0.01	-	-	-	-	SIL-1	1.0	438209.9	3698032.4	-
$PM_{2.5}$ 24 Hour H8H	3.2	3.4	-	14.9	18.3	35	52.3	438232.3	3698033.1	2208.8

Pollutant, Time Period and Standard	Modeled Facility Concentration (µg/m3)	Modeled Concentration with Surrounding Sources (µg/m3)	Secondary PM (µg/m3)	Background Concentration (µg/m3)	Cumulative Concentration (µg/m3)	Value of Standard (µg/m3)	Percent of Standard	Location		
								UTM E (m)	UTM N (m)	Elevation (ft)
$PM_{2.5}$ Annual H1H	0.42	0.44	-	5.1	5.54	12	46.2	438232.3	3698033.1	2208.8
PM_{10} 24 Hour H2H	29.1	29.3	-	94.7	124.0	150	82.7	438209.9	3698032.4	2209.71
PM_{10} 24 Hour Class II	29.1	29.3	-	-	29.3	30	97.7	438209.9	3698032.4	2209.71
PM_{10} Annual Class II	9.19	9.23	-	-	9.23	17	54.3	438232.3	3698033.1	2208.8
PM_{10} 24 Hour Class I	0.32	0.58	-	-	0.58	8	7.3	437142.4	3699642.1	2195.77
PM_{10} Annual Class I	0.0083	-	-	-	-	SIL-0.2	4.2	437055.0	3699583.7	2222.57

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 all regulated sources at Roper Construction's Alto CBP. All facility pollutants with ambient air quality standards were modeled to show compliance with those standards. All results of this modeling analysis showed the facility is in compliance with applicable ambient air quality standards and PM_{10} and NO_2 PSD Class I and Class II increment limits. Based on the dispersion modeling analysis, the permit can be issued.