

Jim Burnett

Hello Ms Saikrishnan,

My name is Jim Burnett and I have residence in Alto, NM, living along Airport Road, just east of the proposed Concrete Batch Plant, named in the subject's NMED application. As I understand the situation, the subject application has been filed and has been deemed "administratively complete" by your office. Further, as I understand the process, you are now in the review process of this application.

I am writing to you today, regarding my understanding of Roper Construction's application. As I am not a civil engineer and/or EPA expert, I am confining my feedback to areas in which a layman's understanding might still be germane to your process. My feedback is a result of having linked to Roper's application, on-line, and reviewing sections aside those citing technical information and analysis.

The following inconsistencies and/or inaccuracies were noted:

1. There are several mentions of Ruidoso's "average wind speed". The first mention is in Section 6, page 2 in the sub-section, Uncontrolled Particulate Emissions Rate (there are other referrals to this table in Roper's application). Firstly, there's a certain amount of risk involved when using averages, as I'm sure you already know. Ruidoso/Alto residents are well aware of the high, consistent winds that frequent our area, typically in the spring and fall seasons. While a relatively low average wind speed of 8.3 mph paints a generally low risk of particulate dispersion, it is exceedingly high wind speeds that will have the greatest consequence for Alto residents. Secondly, while the average wind speed table used by Montrose Air Quality Services in their analysis might be the only such reference document available to them, utilizing a table that is 15 years old, runs the risk of minimizing or understating the impact to the area. Are there no more current wind speed data available?
2. Following this same line of thinking; please reference Montrose Air Quality Services' analysis, which is appended to the Roper application, specifically, Section 2.5, page 12 (page 181 of the on-line Roper application). Montrose states, "early morning and late afternoon hours with low wind speeds are typically determined to represent the highest modeled hourly concentrations for low release fugitive emission sources". Again, the risk here isn't the average wind speed, or, utilizing the two periods of the day when wind speeds are at their lowest. The true risk is during periods of peak wind speeds (see #1, above). Montrose may have used accepted modeling practices, however, this is flawed reasoning, at best. It is specious reasoning, in its worst application.
3. In analyzing the meteorological data, the Roper application cites Holloman AFB as a likely comparative data set to Ruidoso/Alto. Please refer to section 16-S, page 12 (page 162 of the on-line Roper application) in which "Dispersion model meteorological input files were created from meteorological data collected at Holloman AFB, NM for the years 2016 - 2020, about 45 miles north-north-east from the site". Please open and refer to the attached web capture file. (I apologize for my underdeveloped computer skills. You will need to use the magnification tool at the top of the opened file to enlarge the area map and then drag the area map downward, in order to view the

Holloman and Ruidoso areas.)

Holloman AFB sits a full 2,500 -3,500 feet below Alto, NM's elevation (approx. 4,000 feet for Holloman vs approx. 7,500 feet for Alto). Additionally, as is depicted in the screen shot, Holloman AFB sits on a high desert plain, while Ruidoso/Alto is in mountainous terrain and in fact, the proposed CBP sits in a bowl, defined by surrounding hills and peaks. The Roper application states, "The similar elevation, topography, terrain, vegetation, and climate of both sites make this meteorological data representative of the model area". This logic is questionable, at best. At worst, it's specious application of data that's inconsistent with the proposed site for the CBP. Finally, as noted in the paragraph above, the Roper application states that Holloman is 45 miles north-north-east of the proposed CBP site. It's plain to see that's just not correct. This might be a minor point. However, it suggests that Montrose has been less than thorough in their preparation of Roper's NMED application and that there could be other inaccuracies in the application.

4. Please see section 16-J, Sensitive Areas, page 5 (page 155 of the on-line Roper application). Herein, when asked whether there were likely to be public comments opposing the permit application, the Roper application response is, no. Given the extent to which Roper has gone in documenting the required notification of residents and/or interested parties in the immediate area of the proposed CBP, surely the "no" response is an attempt to shorten the application review process. More likely is Roper's misinterpretation or misunderstanding of the reaction of the local community.

Thank you for your time and consideration. Please include me, via my email address, on future developments, especially regarding details of a public hearing.

Jim Burnett

Alto, NM

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