

Martin J. Chávez, Mayor

City of Albuquerque

Environmental Health Department Air Quality Division

Permitting Checklist

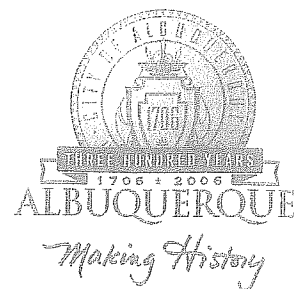
Please fill in the appropriate dates and initial. This checklist will serve to track what action has been performed and who performed the action.

Facility Name:	Permit #:	Date Action	Who
Action Taken		Was Taken	Performed?
1. Review Fees received from the Facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Application Review Fee <u>000</u> NSPS Review Fee _____ NESHAP Review Fee _____ Other Review Fee _____		2-20-07	
2. Application received by the Division		2-20-07	
3. Permit Application Ruled Complete and letter sent to company		6-15-07	us
4. Date for 90-day action on permit (based on date application was ruled complete to final date permit should be issued or denied)		9-13-07	us
5. Permit Application Ruled Incomplete and letter sent to company		3-22-07	us
6. Notifications and copy of public notice sent to each <u>North Edin, Greater Gardner, Montebello Gardens</u>		6-15-07	us
7. 45-Day Public Comment Period Start: <u>6-18-07</u> End: <u>8-2-07</u>		6-18-07	us
8. Public Comment Received? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If so, list interested party. <u>Kyle Greife, Siller Gardner</u>		8-1-07	us
9. Public Hearing Requested? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If so, date of public hearing.		3-18-08	us
10. Date modeling submitted for review		2-27-07	us
11. Due date for modeling review. Part 41 Permit (10 working days): <u>3-13-07</u> Part 42 Permit (20 working days): _____		2-27-07	us
12. Modeling Review Completed		5-21-07	
13. File memo made to the permit file (applicability, emission calcs, etc)			
14. Draft Permit Completed			
15. Permit Tracking & Enforcement/Compliance Database entries made ___ administrative ___ timelines ___ emissions ___ process equipment ___ recordkeeping, monitoring frequencies ___ reporting requirements			
16. Draft Permit submitted to lead permitting specialist for initial technical review			
17. Initial Technical Review of Draft Permit (lead permitting specialist)			
18. Technical Review of Draft Permit for Enforceability of Conditions			
19. Technical Review of Draft Permit for Enforceability of Conditions			
20. Final Technical Review of Draft Permit (lead permitting specialist)			
21. Final Permit sent to Supervisor for signature			
22. Final Permit signed by Supervisor			
Other Actions Taken:			

CITY OF ALBUQUERQUE

Environmental Health Department

Alfredo R. Sandistevan, Director



Mr. Peter Cantrup
Vice President
PO Box 38
Española, NM 87532

March 22, 2007
Certified Mail # 7006 0810 0003 9353 0315
Return Receipt Requested

Re: Application No. 0902-M2 for American Cement Corporation

Dear Mr. Cantrup:

Environmental Health
Department

Air Quality Division

The City of Albuquerque, Environmental Health Department, Air Quality Division received an air quality application from American Cement Corporation for an Authority to Construct permit for the facility located at 4702 Carlton Way NW, Albuquerque, New Mexico. The original application was received on February 20, 2007 and ruled incomplete on March 22, 2007. Further processing of the application is not possible until the following information is received.

P.O. Box 1293

1. The exhaust temperatures for the point sources are listed at -459.67°F and the exhaust velocities are 0.0033 fps. Please resubmit the modeling with these issues addressed.

Albuquerque

The above information is required pursuant to 20.11.41.13.B (4) NMAC, and must be submitted in order for the Division to process your application.

New Mexico 87103

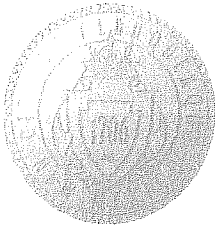
If you have any questions, please do not hesitate to contact me at (505) 768-1996.

Sincerely,

www.cabq.gov

Kevin Troutman, Environmental Health Scientist
Air Quality Division
Environmental Health Department
City of Albuquerque

cc: file



City of Albuquerque
Environmental Health Department
Air Quality Division



Martin Chavez, Mayor

Alfredo Santistevan, Director

Interoffice Memorandum

Request for Air Quality Dispersion Modeling Summary

Date: February 27, 2007
To: George Dingman, Environmental Health Specialist II
From: Kevin Troutman, Environmental Health Scientist
Subject: Execute Air Dispersion Modeling for American Cement Corporation. (permit # 0902-M2) to determine compliance with the NAAQS and NMAAQs for TSP, PM₁₀, and PM_{2.5}.

Permit Number: Air Quality Permit # 0902-M2

Site Location: 4702 Carlton Rd, Albuquerque, NM
UTM: 350951E; 388587N; Zone:13; NAD 27

Scope: American Cement Corporation is proposing to increase production of their Portland cement and flyash transfer station from 190,000 tons per year to 700,000 tons per year of Portland cement and 60,000 tons of flyash to 180,308 tons per year. The proposed facility will consist of five storage silos and five baghouses.

- American Cement Corporation is proposing to limit the operating schedule from 4:00 am to 12:00 am (20 hrs per week), 6 days a week, 52 weeks a year.
- The process rate for each cement silo is 28.05 tons per hour.
- The process rate for the flyash silo is 28.9 tons per hour.
- The haul road will handle 6 trips per hour.
- As soon as available, please provide the emission rates used in the analysis
- Please prepare a modeling summary of the air dispersion analysis.

Modeling Files: The modeling files are located in the following path:

X:\SHARE\Air Dispersion Modeling\Sources\American Cement Corporation\ATC_Permit_0902-M2

Model Due Date: March 13, 2007.

cc: File
Dario Rocha, Supervisor COA/EHD/AQD



City of Albuquerque

Environmental Health Department

Alfredo Santistevan, Director

Martin Chavez, Mayor

Interoffice Memorandum

August 7, 2007

To: Dario Rocha, Supervisor Permitting and Technical Analysis Section

From: Kevin Troutman, Environmental Health Scientist *KT*

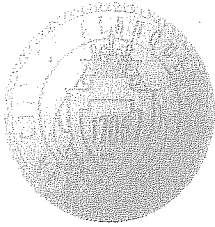
Subject: Issues raised by Mr. Kyle Silfer, Greater Gardner N.A.

In a letter dated August 1, 2007, Mr. Kyle Silfer of the Greater Gardner N.A. raised a number of issues with permit application 0902-M2. They are addressed as follows:

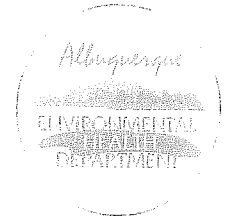
1. The increase of total suspended particulate (TSP) emissions (TSP emissions were used in the discussion held on July 26 as they are the highest) from 3.9 tons per year to 8.15 tons per year is a direct result increase of operating hours from 11 hours to 20 hours per day. The TSP annual ambient air concentration of 38.6 mg/m^3 was retrieved from the modeling analysis report from permit application 0902-M1 dated October 11, 2005. The TSP annual concentration of 38.3 mg/m^3 is from the modeling analysis for application 0902-M2 dated May 21, 2007. The earlier model run was conducted using ISCT3 while the later run was conducted using AERMOD v. 07026. The change in concentration is a result of the difference in how the two different models handle plume dispersion. In addition to the possibility that there may be a difference in the control efficiency between in the revision, the possibility of differences in the model characteristics was proposed to Mr. Silfer. These differences were confirmed after the conclusion of the phone call with a discussion with Mr. George Dingman. Not mentioned in the response, but a topic of discussion during the phone call was the reduction in hourly TSP concentration. This was also confirmed to be a result of the change in models. Also, the applicant provided manufacturer's data showing 99.8% control efficiency for the attached baghouses where 99.0% efficiency was used in the calculations for permit 0902-M1. At the time of the phone call, the control efficiency had not been reviewed.
2. The model does incorporate TSP, PM_{10} and $\text{PM}_{2.5}$ emissions from haul roads using the increase in traffic. The question Mr. Silfer raised during the phone call was regarding Diesel emissions from the increase in truck traffic. 20.11.41 NMAC, for

which application 0902-M2 is a permit application, covers stationary sources and does not cover mobile sources, such as diesel trucks.

3. A public notice was published in the Albuquerque Journal on June 18, 2007 as required by 20.11.41.14.A(3) NMAC. In addition, the Division mailed out a copy of the public notice to neighborhood associations within $\frac{3}{4}$ of a mile from the facility. Mr. Bob Warrick of the NECCA signed for a certified letter regarding the property on June 25, 2007. The President of the Monkbridge Gardens according to the list provided to the Division by the Office of Neighborhood Coordination dated March 23, 2007 was Mr. Ben Noyce, who signed for a certified letter on June 20, 2007. Mr. Silfer signed for his letter on July 2, 2007. The notification of neighborhood associations is above and beyond the requirements stated in 20.11.41 NMAC. All persons may access legal advertisements for free at <http://legals.abqjournal.com/>. Also the Division publishes a list of permits in the public comment period at <http://www.cabq.gov/airquality/>.
4. The Rank Two North Valley Area Plan is a 1993 document that is published by the City of Albuquerque Planning Department. This document was in effect when permit 0902 was re-issued in 1997 and when the modification 0902-M1 was issued in 2005. No portion of 20.11.41 NMAC requires a review to ensure that a source will conform with established planning and zoning.
5. Traffic analysis is performed by the City of Albuquerque Department of Municipal Development. No portion of 20.11.41 NMAC requires a traffic analysis for a source.



City of Albuquerque
Environmental Health Department
Air Quality Division



Martin Chavez, Mayor

Alfredo Santistevan, Director

Interoffice Memorandum

Request for Air Quality Dispersion Modeling Summary

Date: September 25, 2007
To: George Dingman, Environmental Health Scientist
From: Kevin Troutman, Environmental Health Scientist *[Signature]*
Subject: Execute Air Dispersion Modeling for American Cement Corporation. (permit # 0902-M2) to determine compliance with the NAAQS and NMAAQs for TSP, PM₁₀, and PM_{2.5}.

Permit Number: Air Quality Permit # 0902-M2

Site Location: 4702 Carlton Rd, Albuquerque, NM
UTM: 350951E; 388587N; Zone:13; NAD 27

Scope: American Cement Corporation is proposing to increase production of their Portland cement and flyash transfer station from 190,000 tons per year to 700,000 tons per year of Portland cement and 60,000 tons of flyash to 180,308 tons per year. The proposed facility will consist of five storage silos and five baghouses. This 2nd review includes sources missing from the first model.

- American Cement Corporation is proposing to limit the operating schedule from 4:00 am to 12:00 am (20 hrs per week), 6 days a week, 52 weeks a year.
- The process rate for each cement silo is 28.05 tons per hour.
- The process rate for the flyash silo is 28.9 tons per hour.
- The haul road will handle 6 trips per hour.
- As soon as available, please provide the emission rates used in the analysis
- Please prepare a modeling summary of the air dispersion analysis.

Modeling Files: The modeling files are located in the following path:

X:\SHARE\Air Dispersion Modeling\Sources\American Cement Corporation\2nd review 0902-M2

Model Due Date: October 9, 2007.

cc: File
Dario Rocha, Supervisor COA/EHD/AQD

Troutman, Kevin W.

From: Troutman, Kevin W.
Sent: Wednesday, October 03, 2007 1:19 PM
To: 'Jonathan Madrid'
Subject: RE: American Cement Files

Jonathan,

While we are waiting for the second modeling review, I need to get a copy of at least the last page of the application signed by the responsible official (Mr. Cantrup from what I remember) in accordance with 20.11.41.13.B(10) NMAC. I'm sorry I forgot to mention it this morning during our conversation.

Thanks,
Kevin

From: Jonathan Madrid [mailto:gljonathan@flash.net]
Sent: Thursday, September 20, 2007 11:55 AM
To: Troutman, Kevin W.
Subject: American Cement Files

Kevin:

Please find the revised application with the process tables attached. Also attached are the modeling files. As for your question of where some of the emission points went, they are as follows:

The bulk loader spout emission points from the previous permit were incorporated into the truck loading points since these points now have their own dust collection systems.

Truck unloading points were incorporated into the Silo calculations because all dust is channeled through the Silo Dust Collectors and the connection from the trucks to the silos is air tight.

The Bootlift Rail Connector emission points were also incorporated into the Silo calculations because the railcar unloading process is completely enclosed.

Please let me know if this answers your questions and feel free to call or email me if you need anything else.

Regards,

Jonathan Madrid
GL Environmental, Inc.

10/3/2007



P.O. Box 1057
Eunice, NM 88231
505-239-5077

P.O. Box 1746
Las Vegas, NM 87701

Phone: 505-454-0830
Fax: 505-454-8093
Email: glenv@flash.net

January 15, 2008

Environmental Health/Air Quality
Dario Rocha
11850 Sunset Gardens SW
Albuquerque, NM 87121

Dear Mr. Rocha:

GL Environmental, Inc., on behalf of American Cement Corp., submitted Application No. 0902-M2 which was ruled complete on June 15, 2007. Public notice was issued and, pursuant to 20.11.41.14.A NMAC, the public comment period of 45 days ran from June 18, 2007 until August 2, 2007. As per Kevin Troutman, a public hearing was requested by a neighborhood organization but no word has been heard since.

Pursuant to 20.11.41.15.C NMAC "The Department shall take formal action upon each application in a timely manner not to exceed one hundred twenty (120) days or one hundred eighty (180) days if a public hearing has been called from the date the application was deemed complete yet shall not preclude the public comment provisions of Paragraph (4), Subsection A. of 20.11.41.14 NMAC. Such formal action shall be to either grant the permit, grant the permit subject to conditions, or deny the permit. The Department's formal action shall be based upon information contained in the Department's administrative record."

It is now approaching day 216 of the application being ruled complete with no sign of either the public hearing being addressed or the permit being issued. It is GL Environmental, Inc.'s stance that since no public hearing has been scheduled and since the application is far in exceedance of the 180 day time frame stated in 20.11.41.15.C NMAC the permit should be issued.

Please feel free to call me with any questions or comments you may have. My office number is (505) 454-0830.

Regards,

Jonathan Madrid
GL Environmental, Inc.

Cc: American Cement Corp.

Troutman, Kevin W.

From: Troutman, Kevin W.
Sent: Wednesday, February 06, 2008 12:59 PM
To: 'Jonathan Madrid'
Subject: RE: American Cement Calculations

Jonathan,

I don't know if you have been contacted yet, but Therese Martinez-Loner of our office will probably be contacting you with some dates for the public hearing. The request was approved by the new director. As a result, I will need the formulas used for the process equipment listed below before close of business on Friday.

Thanks,
Kevin

From: Troutman, Kevin W.
Sent: Friday, February 01, 2008 7:35 AM
To: 'Jonathan Madrid'
Subject: American Cement Calculations

Jonathan,

I got your message. I will actually be out in the field today. Could you email me the calculations used? I don't need anything fancy, I just need to know which emission factors you used and what equations you used. All entries cite AP-42 as the emission rate source. The total emissions for the flyash truck loading were 90.746 lb/hr TSP uncontrolled, 31.79 lb/hr PM10 uncontrolled, 0.907 lb/hr TSP controlled, and 0.3179 lb/hr PM10 controlled. For each cement truck loading the calculated emissions were 20.196 lb/hr TSP uncontrolled, 12.903 lb/hr PM10 uncontrolled, 0.202 lb/hr TSP controlled, 0.12903 lb/hr PM10 controlled.

Thanks,
Kevin

Kevin Troutman, M.S., REHS
Air Quality Division
City of Albuquerque
(505) 768-1996
kwtroutman@cabq.gov

Troutman, Kevin W.

From: Rocha, Dario W.
Sent: Tuesday, February 26, 2008 2:23 PM
To: Troutman, Kevin W.
Subject: FW: [N Valley Coalition] Public Hearing on Cement Plant Proposal to Double Emissions at North Valley site

Kevin, please see following string of e-mails. This may be a prelude on some of the issues they will raise. It would be good to have answers to some of these questions.

Dario

From: Albrecht, Christopher P.
Sent: Tuesday, February 26, 2008 12:55 PM
To: Rocha, Dario W.
Subject: FW: [N Valley Coalition] Public Hearing on Cement Plant Proposal to Double Emissions at North Valley site

Dario,

Margaret sent this over to me this afternoon regarding the American Cement PIH. We will all need to discuss as a group.

Christopher P. Albrecht, Manager
Air Quality Protection Programs, Air Quality Division
City of Albuquerque Environmental Health Department

Office Phone: (505) 768-1952
Email: calbrecht@cabq.gov

From: Nieto, Margaret
Sent: Tuesday, February 26, 2008 12:46 PM
To: Tavarez, Isreal L.; Albrecht, Christopher P.; Macias, Fabian
Subject: FW: [N Valley Coalition] Public Hearing on Cement Plant Proposal to Double Emissions at North Valley site

For your information.
Margaret

From: Jens Deichmann [mailto:deichman@swcp.com]
Sent: Monday, February 25, 2008 1:03 PM
To: Nieto, Margaret

2/27/2008

Subject: FW: [N Valley Coalition] Public Hearing on Cement Plant Proposal to Double Emissions at North Valley site

Margaret: I just received this from the North Valley Coalition. I was not aware of this and I assume the hearing they refer to is a public meeting. Thought it would be helpful for you and staff to be aware of concerns being expressed.

Jens

From: North-Valley-Coalition@googlegroups.com [mailto:North-Valley-Coalition@googlegroups.com] On Behalf Of Claude Morelli
Sent: 02/25/2008 9:39 AM
To: north-valley-coalition@googlegroups.com
Subject: [N Valley Coalition] Public Hearing on Cement Plant Proposal to Double Emissions at North Valley site

Greetings North Valley friends and neighbors—

Recently, I received a message from Kyle Silfer, who is president of the Greater Gardner Neighborhood Association. Kyle asked me to forward his message to the North Valley Coalition's contact list (please scroll down to view). He is asking for your help to respond to a request by American Cement Corporation to expand operations and double emissions of particulates from their cement batching facility located at 4702 Carlton Street (just north of Griegos Road, along the BNSF Railway).

A hearing on this matter has been scheduled as follows:

=====
WHAT: Air Quality Hearing / Expansion of Cement Plant at Griegos & BNSF Railroad

WHEN: Tuesday, 18 March 2008, from 6:00 to 8:00 PM

WHERE: Los Griegos Health and Social Service Center (1231 Candelaria Road NW)

WHO: You, your neighbors, and anyone else you think might be interested.

WHY: Because breathing is important!
=====

I'm sure that Kyle would appreciate a note from you in advance of the hearing and seeing you there as well. His email address is kyle@rtoads.com.

Thank you.

Claude Morelli
North Valley Coalition

----- Forwarded Message -----

From: Kyle Silfer <kyle@rtoads.com>
To: Claude Morelli <claude.morelli@transnuevo.com>
Sent: Friday, February 22, 2008 9:37:34 AM
Subject: March 18 American Cement Air Quality Hearing

I'm Kyle Silfer, president of the Greater Gardner Neighborhood Association, representing a residential

2/27/2008