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**PHONE RECORD**

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**TO:** PERMIT FILE FOR AMERICAN CEMENT #0902-M3  
**FROM:** REGAN EYERMAN, ENVIRONMENTAL HEALTH SCIENTIST  
**SUBJECT:** PHONE MESSAGE WITH VERN CHOQUETTE, PRINCIPAL CONSULTANT, TRINITY CONSULTANTS  
**DATE:** 3/19/2009

PHONE CALL DATES: 3/19/2009

CONVERSATION/MESSAGE LEFT:

I called Mr. Vern Choquette on 3/19/2009 regarding an email he sent that day on PM<sub>2.5</sub>/TSP and PM<sub>10</sub>/TSP ratios used in the permit application. I told him that the documentation he sent me regarding the PM<sub>2.5</sub>/TSP ratio was actually for a PM<sub>2.5</sub>/PM<sub>10</sub> ratio, which made the resulting emissions more conservative but acceptable. I didn't understand where he came up with an 80% PM<sub>10</sub>/TSP ratio and I needed an explanation. Mr. Choquette referred me to AP-42 Section 11.6 Portland Cement Manufacturing Tables 11.6-2 and 11.6-5. In Table 11.6-2 the PM<sub>10</sub>/TSP ratio for a dry process kiln with fabric filter is 85% and in Table 11.6-6 the PM<sub>10</sub>/TSP ratio for clinker coolers is 76%. He averaged this out to be approximately 80%. Mr. Choquette did caution that the emissions from these tables are for flue gas from processing, but feels this ratio is appropriate as it is conservative. I don't have a problem using data from the Portland Cement industry as the owner of American Cement, GCC, manufactures Portland Cement.

Table 11.6-2 (English Units). EMISSION FACTORS FOR PORTLAND CEMENT MANUFACTURING  
KILNS AND CLINKER COOLERS<sup>a</sup>

Process	Filterable <sup>b</sup>				Condensable <sup>c</sup>			
	PM	EMISSION FACTOR RATING	PM-10	EMISSION FACTOR RATING	Inorganic	EMISSION FACTOR RATING	Organic	EMISSION FACTOR RATING
Wet process kiln (SCC 3-05-007-06)	130 <sup>d</sup>	D	31 <sup>e</sup>	D	ND		ND	ND
Wet process kiln with ESP (SCC 3-05-007-06)	0.77 <sup>f</sup>	C	0.65 <sup>g</sup>	D	0.15 <sup>h</sup>	D	ND	ND
Wet process kiln with fabric filter (SCC 3-05-007-06)	0.46 <sup>j</sup>	E	ND	E	0.20 <sup>j</sup>	E	ND	ND
Wet process kiln with cooling tower, multiclone, and ESP (SCC 3-05-007-06)	0.20 <sup>k</sup>	E	ND	E	0.29 <sup>k</sup>	E	ND	ND
Dry process kiln with ESP (SCC 3-05-006-06)	1.0 <sup>m</sup>	D	ND	D	0.38 <sup>m</sup>	D	ND	ND
Dry process kiln with fabric filter (SCC 3-05-006-06)	0.20 <sup>n</sup>	D	0.17 <sup>p</sup>	D	0.89 <sup>n</sup>	D	ND	ND
Preheater kiln (SCC 3-05-006-22)	250 <sup>q</sup>	D	ND	D	ND		ND	ND
Preheater kiln with ESP (SCC 3-05-006-22)	0.26 <sup>r</sup>	D	ND	D	ND		ND	ND
Preheater kiln with fabric filter (SCC 3-05-006-22)	0.25 <sup>s</sup>	C	ND	C	0.033 <sup>t</sup>	D	ND	ND
Preheater/precalciner kiln with ESP (SCC 3-05-006-23)	0.048 <sup>u</sup>	D	ND	D	ND		ND	ND
Preheater/precalciner process kiln with fabric filter (SCC 3-05-006-23)	0.21 <sup>v</sup>	D	ND	D	ND		ND	ND
Preheater/precalciner process kiln with PM controls (SCC 3-05-006-23)	ND		ND		0.16 <sup>w</sup>	D	ND	ND

85%

Table 11.6-5. SUMMARY OF AVERAGE PARTICLE SIZE DISTRIBUTION FOR PORTLAND CEMENT KILNS<sup>a</sup>

Particle Size, $\mu\text{m}$	Cumulative Mass Percent Equal To Or Less Than Stated Size			
	Uncontrolled		Controlled	
	Wet process (SCC 3-05-007-06)	Dry process (SCC 3-05-006-06)	Wet process With ESP (SCC 3-05-007-06)	Dry process With FF (SCC 3-05-006-06)
2.5	7	18	64	45
5.0	20	ND	83	77
10.0	24	42	85	84
15.0	35	44	91	89
20.0	57	ND	98	100

<sup>a</sup> Reference 3. SCC = Source Classification Code. ND = no data.

Table 11.6-6. SUMMARY OF AVERAGE PARTICLE SIZE DISTRIBUTION FOR PORTLAND CEMENT CLINKER COOLERS<sup>a</sup>

Particle Size, $\mu\text{m}$	Cumulative Mass Percent Equal To Or Less Than Stated Size	
	Uncontrolled (SCC 3-05-006-14, 3-05-007-14)	With Gravel Bed Filter (SCC 3-05-006-14, 3-05-007-14)
2.5	0.54	40
5.0	1.5	64
10.0	8.6	76
15.0	21	84
20.0	34	89

<sup>a</sup> Reference 3. SCC = Source Classification Code.

**Eyerman, Regan V.**

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**From:** Vern Choquette [vchoquet@trinityconsultants.com]  
**Sent:** Thursday, March 19, 2009 9:24 AM  
**To:** Eyerman, Regan V.  
**Cc:** droark@gcc.com  
**Subject:** RE: Authority-to-Construction Permit Modification Review - American Cement

**Attachments:** AP-42 Background Document.pdf



AP-42 Background  
Document.pdf ...

Reagan:

I have attached the background document and highlighted the two ratios (0.314 for PM2.5 and 0.76 for PM10). Trinity rounded up on the PM10 (i.e., 0.80) to present a more conservative estimate of PM10 emissions.

Please let us know if you need anything additional.

(See attached file: AP-42 Background Document.pdf)

Vern Choquette  
Principal Consultant  
Trinity Consultants  
Phone: (405) 228-3292  
Fax: (405) 228-3293

RE: Authority-to-Construction Permit Modification Review - American Cement

Eyerman, Regan V.

to:  
Vern Choquette

03/16/2009 10:50 AM

Cc:  
droark

Vern,

**Background Document for Revisions to Fine  
Fraction Ratios Used for AP-42 Fugitive Dust  
Emission Factors**

Prepared by

**Midwest Research Institute  
(Chatten Cowherd, MRI Project Leader)**

For

**Western Governors' Association  
Western Regional Air Partnership (WRAP)  
1515 Cleveland Place, Suite 200  
Denver, Colorado 80202**

Attn: Richard Halvey

MRI Project No. 110397

February 1, 2006  
Finalized November 1, 2006

ratios. This might occur, for example, at higher soil (or other surface material) moisture contents. However, the emissions from such sources typically are substantially lower with correspondingly less impact on the ambient environment.

**Table 1. Proposed Particle Size Ratios for AP-42**

Fugitive dust source category	AP-42 section	PM <sub>2.5</sub> /PM <sub>10</sub> Ratio	
		Current	Proposed
Paved Roads	13.2.1	0.25	0.15
Unpaved Roads (Public & Industrial)	13.2.2	0.15	0.1
Construction & Demolition	-	0.208 <sup>1</sup>	0.1
Aggregate Handling & Storage Piles	13.2.4	0.314	0.1 (traffic) 0.15 (transfer)
Industrial Wind Erosion	13.2.5	0.40	0.15
Agricultural Tilling	-	0.222 <sup>2</sup>	0.2 (no change)
Open Area Wind Erosion	-	-	0.15

Notes:

<sup>1</sup> AP-42 Section 13.2.3 suggests using emission factors for individual dust producing activities, e.g., materials handling and unpaved roads. The WRAP Fugitive Dust Handbook recommends using a fine fraction ratio of 0.208 from a report prepared for the US EPA, Estimating Particulate Matter Emissions from Construction Operations (MRI, 1999).

<sup>2</sup> Agricultural tilling was dropped from the 5<sup>th</sup> edition of AP-42. The WRAP Fugitive Dust Handbook recommends using a fine fraction ratio of 0.222 from Section 7.4 of the California Air Resources Board's Emission Inventory Methodology (CARB, 2003).

The justification for each proposed ratio in Table 1 is provided by source category in the sections below. In each case, reference is made to test reports that contain supporting data.

### **Paved Roads**

For the dust component of particulate emissions from paved roads, a PM<sub>2.5</sub>/PM<sub>10</sub> ratio of 0.15 is recommended. The proposed ratio is based on the factor-of-two bias in the cyclone/impactor data for the wind tunnel study, which tested western soils and road surface materials. As shown in Table 1, the current AP-42 ratio is 0.25. It should be recalled that the nondust component of paved road particulate emissions has been assigned a much higher ratio of 0.76, based on inputs from the EPA's MOBILE 6 model.

**Eyerman, Regan V.**

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**From:** Vern Choquette [vchoquet@trinityconsultants.com]  
**Sent:** Friday, March 13, 2009 9:56 AM  
**To:** Eyerman, Regan V.  
**Cc:** droark@gcc.com  
**Subject:** Re: Authority-to-Construction Permit Modification Review - American Cement

Regan:

The responses to you questions are shown below.

Vern Choquette  
Principal Consultant  
Trinity Consultants  
Phone: (405) 228-3292  
Fax: (405) 228-3293

Authority-to-Construction Permit Modification Review - American Cement

Eyerman, Regan V.

to:  
Vern Choquette

03/12/2009 05:03 PM

Mr. Choquette,

I have reviewed the application that the City of Albuquerque, Environmental Health Department, Air Quality Division (Division) has received from American Cement Corporation. Additional information is required in order to complete my review.

Please confirm the control equipment in Table B in ATC permit #0902-M2. The new application did not have this information so I am going to assume it hasn't changed:

This information is correct.

Table B - Air Pollution Control Equipment

Process Equipment No.	Type of Air Pollution Control Equipment	Manufacturer	Model Number	Serial Number	Rated Flow Rate (acfm)	*Rated Control Efficiency
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10	Silo 1 Dust Collector	DCL	CFM 330	Job 206039503	1400	99.95%
11	Silo 2 Dust Collector	DCL	CFM 330	Job 206039503	1400	99.95%
12	Silo 3 Dust Collector	DCL	CFM 330	Job 206039503	1400	99.95%
13	Silo 4 Dust Collector	Whirl Airflow Corp.	450-56/1 80	MC2695	1400	99.95%
14	Silo 5 Dust Collector 1	Whirl Airflow Corp.	450-56/1 80	MC2695	1400	99.95%
15	Silo 5 Dust Collector 2	Whirl Airflow Corp.	450-56/1 80	MC2695	1400	99.95%
16	Dust Collector Loadout (Silos 1-3)	DCL	UN800EV	Job 206039503	1400	99.95%
17	Dust Collector Loadout (Silo 4)	DCL	CFM 330	Job 206039501	1400	99.95%
18	Dust Collector Loadout (Silo 5)	DCL	CFM 330	Job 206039501	1400	99.95%

In the calculations an emission rate of 0.0075 g/cu ft. is used for controlled emissions calculations. This rate was provided on a Dust Collector Efficiency Statement for DCL dust collectors provided in section 4 of the application. If there are also Whirl

Airflow Corp. dust collectors present please provide a dust collector efficiency statement for this brand to confirm its emission rate.

The DCL and Whirl Airflow Corp. dust collectors use the same cartridge filter, therefore the efficiencies for both units are the same. We will send you the Whirl airflow statement when available.

According to Table 1-1 in the application, a correction factor of 0.6 was used for Loadout (Silos 1-3). I checked with our air dispersion modeling scientist and this is not appropriate as the exhaust is a point, not a fugitive, emission.

As noted in the modeling protocol and permit application, the loadout for silos 1-3 exhausts inside the building located under the silos at a release height of less than 10 meters. Since the point source exhausts inside a building, it is considered a fugitive point. Please refer to Page 10 of the Air Dispersion Modeling Guidelines (07/08). ) check  
with  
Jef

Also, according to Table 1-1, PM10 emissions rates are 80% and PM2.5 rates are 31% of the TSP rates. Please provide the background documentation regarding that.

As noted in the permit application footnotes, refer to AP-42 Section 13.2.4 and Page 5 of the Background Document for Revisions to Fine dust Fraction Ratios Used for AP-42 Fugitive Dust Emission Factors (11/06).

Please provide the requested information by Friday, March 20, 2009. If you have any questions please do not hesitate to contact me.

Thank you.

Regan Eyerman, EIT  
City of Albuquerque, Air Quality Division  
Environmental Health Scientist  
505-767-5625

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The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon, this information by persons or entities other than the intended recipient is prohibited. If you Received this in error, please contact the sender and delete the material from any computer.

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LVAF Pulse-Jet Filter Specifications  
 FLYASH - Type III

GRADE:	SB
FIBER TYPE:	Polyester
DESCRIPTION:	The design standard for polyester reverse-flow media which combines high efficiency, low resistance, low pressure drop, low moisture tolerance to give an excellent high volume, extended life filter.

	IMPERIAL STANDARD	METRIC
MATERIAL WEIGHT	8 oz/yd <sup>2</sup>	278 G/M <sup>2</sup>
CALIPER OVERALL	.024 inches	.61mm
PERMEABILITY (FRAZER)*	24	192
MULLEN BURST DRY	388 PSI	2675 KPA
TEMPERATURE LIMIT	275° F	135° C
EFFICIENCY AT OPERATING CONDITIONS		99.99%

BIA RATING U, S, G, C

\* Frazier Method - the volume of air, in CFM, that can flow through 1 ft<sup>2</sup> of media at 0.5 W.G. pressure drop (or L/sec/M<sup>2</sup> at 20 mm H<sub>2</sub>O).

All data listed are average values.  
 Specifications are subject to change without notice.  
 (582-4/00)

DATA NA



8224 Nieman Road, Lenexa, Kansas 66214, Phone: (913) 831-0740, Fax: (913) 831-0271

**Eyerman, Regan V.**

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**From:** Vern Choquette [vchoquet@trinityconsultants.com]  
**Sent:** Monday, March 02, 2009 3:34 PM  
**To:** Eyerman, Regan V.  
**Subject:** Application Page and Draft Permit

**Attachments:** ATC 0902-M2.DOC; AQPermitAppChangeHours.pdf



ATC 0902-M2.DOC (546 KB) AQPermitAppChangeHours.pdf (15...

Ms. Eyerman:

Please find attached the replacement page for the American Cement Permit application and a draft application for your use.

Thanks -

Vern Choquette  
Principal Consultant  
Trinity Consultants  
Phone: (405) 228-3292  
Fax: (405) 228-3293

(See attached file: ATC 0902-M2.DOC) (See attached file: AQPermitAppChangeHours.pdf)

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**Eyerman, Regan V.**

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**From:** Eyerman, Regan V.  
**Sent:** Thursday, March 19, 2009 1:20 PM  
**To:** 'Vern Choquette'  
**Subject:** RE: Authority-to-Construction Permit Modification Review - American Cement

Vern,  
It was good speaking with you today. Your application is complete.

Thank you.

Regan Eyerman, EIT  
City of Albuquerque, Air Quality Division  
Environmental Health Scientist  
505-767-5625

-----Original Message-----

**From:** Vern Choquette [mailto:vchoquet@trinityconsultants.com]  
**Sent:** Thursday, March 19, 2009 9:24 AM  
**To:** Eyerman, Regan V.  
**Cc:** droark@gcc.com  
**Subject:** RE: Authority-to-Construction Permit Modification Review - American Cement

Reagan:

I have attached the background document and highlighted the two ratios (0.314 for PM2.5 and 0.76 for PM10). Trinity rounded up on the PM10 (i.e., 0.80) to present a more conservative estimate of PM10 emissions.

Please let us know if you need anything additional.

(See attached file: AP-42 Background Document.pdf)

Vern Choquette  
Principal Consultant  
Trinity Consultants  
Phone: (405) 228-3292  
Fax: (405) 228-3293

RE: Authority-to-Construction Permit Modification Review - American Cement

Eyerman, Regan V.  
to:  
Vern Choquette

03/16/2009 10:50 AM

Cc:  
droark

**Eyerman, Regan V.**

---

**From:** Eyerman, Regan V.  
**Sent:** Monday, March 16, 2009 9:52 AM  
**To:** 'Vern Choquette'  
**Cc:** droark@gcc.com  
**Subject:** RE: Authority-to-Construction Permit Modification Review - American Cement

Vern,

I was out of the office Friday, so reviewed your response this morning. I am checking on the 0.6 factor with Jeff Stonesifer, our modeling scientist, and if he has any questions he will get back to you.

In regards to my question regarding PM10 and PM2.5 emission rates, the footnote in the application said to refer to AP-42 13.2.4 and "cement industry information." The background document has a PM2.5/PM10 ratio of 0.314, but that was about all I could find there. I just need to know specifically where the ratios came from.

Thank you and if you have any questions, please do not hesitate to ask.

Regan Eyerman, EIT  
City of Albuquerque, Air Quality Division  
Environmental Health Scientist  
505-767-5625

-----Original Message-----

**From:** Vern Choquette [mailto:vchoquet@trinityconsultants.com]  
**Sent:** Friday, March 13, 2009 9:56 AM  
**To:** Eyerman, Regan V.  
**Cc:** droark@gcc.com  
**Subject:** Re: Authority-to-Construction Permit Modification Review - American Cement

Regan:

The responses to you questions are shown below.

Vern Choquette  
Principal Consultant  
Trinity Consultants  
Phone: (405) 228-3292  
Fax: (405) 228-3293

Authority-to-Construction Permit Modification Review - American Cement

Eyerman, Regan V.  
to:  
Vern Choquette

03/12/2009 05:03 PM

**Eyerman, Regan V.**

---

**From:** Eyerman, Regan V.  
**Sent:** Thursday, March 12, 2009 4:04 PM  
**To:** 'Vern Choquette'  
**Subject:** Authority-to-Construction Permit Modification Review - American Cement

Mr. Choquette,

I have reviewed the application that the City of Albuquerque, Environmental Health Department, Air Quality Division (Division) has received from American Cement Corporation. Additional information is required in order to complete my review.

- Please confirm the control equipment in Table B in ATC permit #0902-M2. The new application did not have this information so I am going to assume it hasn't changed:

**Table B – Air Pollution Control Equipment**

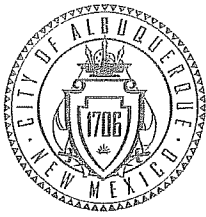
Process Equipment No.	Type of Air Pollution Control Equipment	Manufacturer	Model Number	Serial Number	Rated Flow Rate (acfm)	*Rated Control Efficiency
10	Silo 1 Dust Collector	DCL	CFM 330	Job 206039503	1400	99.95%
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14	Silo 5 Dust Collector 1	Whirl Airflow Corp.	450-56/180	MC2695	1400	99.95%
15	Silo 5 Dust Collector 2	Whirl Airflow Corp.	450-56/180	MC2695	1400	99.95%
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18	Dust Collector Loadout (Silo 5)	DCL	CFM 330	Job 206039501	1400	99.95%

- In the calculations an emission rate of 0.0075 g/cu ft. is used for controlled emissions calculations. This rate was provided on a Dust Collector Efficiency Statement for DCL dust collectors provided in section 4 of the application. If there are also Whirl Airflow Corp. dust collectors present please provide a dust collector efficiency statement for this brand to confirm its emission rate.
- According to Table 1-1 in the application, a correction factor of 0.6 was used for Loadout (Silos 1-3). I checked with our air dispersion modeling scientist and this is not appropriate as the exhaust is a point, not a fugitive, emission.
- Also, according to Table 1-1, PM10 emissions rates are 80% and PM2.5 rates are 31% of the TSP rates. Please provide the background documentation regarding that.

Please provide the requested information **by Friday, March 20, 2009**. If you have any questions please do not hesitate to contact me.

Thank you.

Regan Eyerman, EIT  
 City of Albuquerque, Air Quality Division  
 Environmental Health Scientist  
 505-767-5625



City of Albuquerque  
Environmental Health Department

Martin Chavez, Mayor  
Interoffice Memorandum

March 30, 2009

To: Regan Eyerman, Environmental Health Scientist  
From: Jeff Stonesifer, Senior Environmental Health Scientist *JWS*  
Subject: Review of model for American Cement Corporation  
Permit # 0902-M3

**Site Locations**

4702 Carlton Rd. NW

UTMH: 350,955m UTMV: 3,888,640m Zone:13 NAD 83

**Overview of Facilities**

The facility receives bulk cement and fly ash via truck and rail, stores these materials in silos, and loads them into trucks for distribution to the local market.

**Conclusions of Dispersion Modeling**

Modeling was performed for TSP, PM<sub>10</sub>, and PM<sub>2.5</sub> using ISC. Compliance was demonstrated for NAAQS and NMAAQs.

**Assumptions used in the modeling review**

1. Operating hours: 24/7
2. Continuous emissions during operating hours
3. A fence or some other barrier restricts access to the property

Modeling conducted in-house demonstrates compliance with applicable regulatory requirements. Modeling files are archived, are part of the public record for this permit application, and are available for printing. A modeling protocol was submitted.

**Model (s) Used**  
ISC

**Number of Model Runs Executed in Review**  
4

## Modeling Parameters

non-regulatory default options – allow missing met data; plume depletion for haul road of Holly Asphalt

Emission rates used in the review can be seen below in Table 1.

**Table 1: Particulate Emission Rates for sources**

Source ID	Emission Unit Description	TSP (lbs/hr)	PM10 (lbs/hr)	PM2.5 (lbs/hr)
S2	Silo 2 Dust Collector	0.12	0.12	0.04
S5_DC1	Silo 5 Dust Collector 1	0.12	0.12	0.04
S5_DC2	Silo 5 Dust Collector 2	0.12	0.12	0.04
S4LDT	Loadout (Silo 4)	0.12	0.12	0.04
S5LDT	Loadout (Silo 5)	0.12	0.12	0.04
S4	Silo 4 Dust Collector	0.12	0.12	0.04
S1	Silo 1 Dust Collector	0.12	0.12	0.04
S3	Silo 3 Dust Collector	0.12	0.12	0.04
S123LDT	Loadout (Silos 1-3)	0.07	0.07	0.02
Totals		1.03	1.03	0.34

**Table 2: Point-source parameters**

Source ID	Easting (m)	Northing (m)	Elevation (ft)	Stack Diameter (feet)	Exit Velocity (fps)	Exit Temp (°F)	Stack Height (feet)
S2	351009	3888700	4977	Horizontal		Ambient	89
S5_DC1	350983	3888684	4976	Horizontal		Ambient	75
S5_DC2	350985	3888684	4977	Horizontal		Ambient	75
S4LDT	350981	3888680	4976	Horizontal		Ambient	20
S5LDT	350984	3888686	4976	Horizontal		Ambient	20
S4	350981	3888676	4976	Horizontal		Ambient	75
S1	351007	3888693	4977	Horizontal		Ambient	89
S3	351011	3888706	4977	Horizontal		Ambient	89

Horizontal stack parameters are 3.28 ft diameter and 0.0033 ft/s exit velocity per NMED Modeling Guidelines. An ambient exit temperature is entered into the model as absolute zero.

**Table 3: Volume Source Parameters**

Source	Easting (m)	Northing (m)	Elevation (ft)	Release Height (ft)	Horizontal Dimension (ft)	Vertical Dimension (ft)
S123LDT	351011	3888697	4977	20.67	16.24	41.34

### Receptor Grid

Receptor spacing was 50 meters or less along the fenceline. Beyond the fence, a 100-meter resolution Cartesian receptor grid extends out to at least 0.5 kilometer from the edge of the property. An additional grid with 500 meter resolution further extended out to 5 kilometers.

### Meteorological Data

1986-1990 Albuquerque Airport Data (NWS)

### Adjacent Sources

Holly/Koch Asphalt, permit #559-M3

Modeling Results and Discussion

**Table 4: Impact of emissions vs. Ambient Air Quality Standards**

Pollutant	Maximum Modeled Impact ( $\mu\text{g}/\text{m}^3$ )	Model + Background ( $\mu\text{g}/\text{m}^3$ )	Averaging Time	Lowest Applicable Standard ( $\mu\text{g}/\text{m}^3$ )	Pass/Fail
TSP (H1H)	43.8	78.8	24-hour	150	P
TSP	13.2	48.2	Annual	60	P
PM <sub>2.5</sub> (H1H)	7.7	14.2	24-hour	35	P
PM <sub>2.5</sub>	1.8	8.3	Annual	15	P

The model submitted used urban dispersion coefficients. The Air Quality Division (AQD) encourages the use of rural dispersion coefficients, as opposed to urban numbers, because it results in higher impacts. If the use of rural dispersion coefficients results in a violation of the standards, then modelers should go back and investigate whether it's appropriate to use urban coefficients. Because there was no analysis to defend the choice of urban numbers (i.e. using urban was a subjective decision), it's more defensible to simply use the rural numbers.

To settle any concerns over the use of urban vs. rural coefficients, the model was re-run with rural numbers. The results are listed in Table 4 and are well within NAAQS and NMAAQs.

In the modeling report submitted, a TSP/PM10 background of 31 was used. AQD Modeling Guidelines show a background value of 35 is correct. The results in Table 4 reflect a background value of 35. PM10 results are not listed because the 24-hour TSP result demonstrates compliance for the 24-hour PM10 standard. Because the TSP model demonstrates compliance for PM10 also, the PM10 emission rates listed in Table 1 are the same as the TSP emission rates.

In the cumulative TSP model, the haul road for Holly Asphalt was modeled with adjacent volume sources of the following dimensions: horizontal dimension = 2.79 meters; release height of 2.5 meters and vertical dimension of 2.32 meters. The horizontal dimension implies a road width of about 20 feet. The vertical dimension and release height match up and fit small to medium size truck traffic. The dimensions of the volume sources used for haul road modeling are fine.

According to permit #559-M3, TSP minus PM10 emissions equals 5.7 lb/hr. The 0.6 hourly emissions factor can be further used to reduce the supercoarse particle emissions from 5.7 lb/hr to 3.4 lb/hr. The emissions from the individual haul road volume sources in the model sum up to 0.59 lb/hr. AQD inquired about this discrepancy and Trinity Consultants provided an explanation. Using updated AP-42 data, Trinity re-calculated the emissions from the Holly haul road as 0.95 lb/hr. The 0.6 hourly emissions factor was then used to reduce the 0.95 lb/hr rate to 0.59 lb/hr.

The AQD should accept the model submitted for permit 0902-M3.

American Cement Albuquerque Terminal  
 TSP annual with Holly haul road and rural disp coeff  
 C:\DispModeling\Sources\American Cement 0902-M3\js\_review\TSP\amerCmt\_0902-MS\_1986\_TSP.GRF

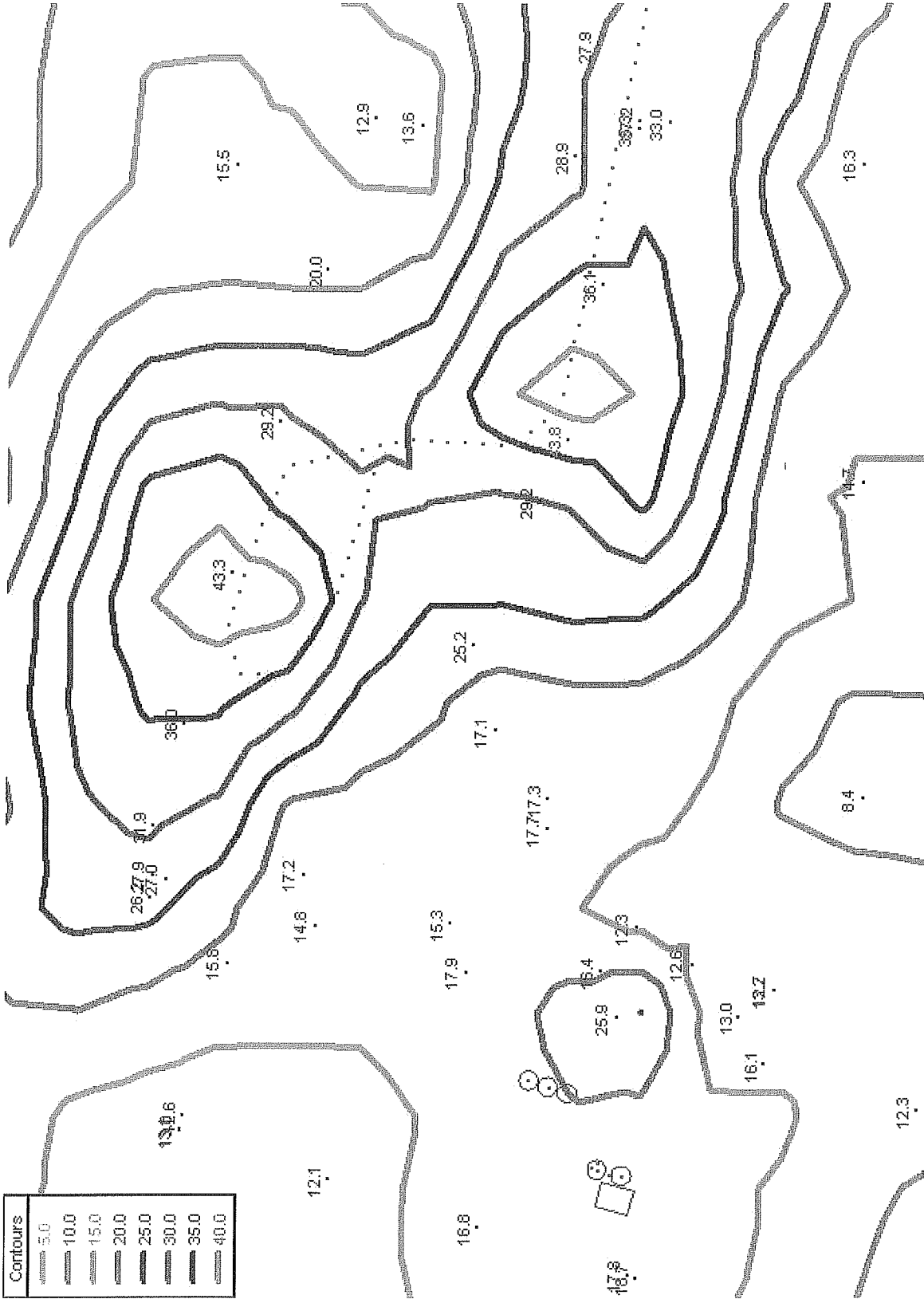


Scale: 1" = 45.4 Meters  
 ANNUAL VALUES FOR GROUP: ALL  
 Max = 13.15442 (351213.5, 3686894)

TSP daily with Holly haul road and rural disp coeff  
 C:\DispModelling\Sources\American Cement\_0902-M3\js\_review\TSP\amerCmt\_0902-M3\_1986\_ISP.GRF

American Cement Albuquerque Terminal

Contours	
	5.0
	10.0
	15.0
	20.0
	25.0
	30.0
	35.0
	40.0



Scale: 1" = 45.4 Meters

HIGH 1ST HIGH 24-HR VALUES FOR GROUP: ALL

Max = 43.77895 (351213.5, 3888694)

```

*** ISC3P - VERSION 04269 ***
*** American Cement Albuquerque Terminal
*** Model Executed on 03/24/09 at 16:05:15 ***
Input File - C:\DispModeling\Sources\American Cement 0902-M3\js_review\TSP\AmerCnt_0902-M3_1986_TSP.DTA
Output File - C:\DispModeling\Sources\American Cement 0902-M3\js_review\TSP\AmerCnt_0902-M3_1986_TSP.LST
Met File - C:\DispModeling\Sources\ABQ8690d.asc

```

```

Number of sources - 83
Number of source groups - 1
Number of receptors - 700

```

\*\*\* POINT SOURCE DATA \*\*\*

SOURCE ID	NUMBER EMISSION RATE PART. CATS.	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	STACK HEIGHT (METERS)	STACK TEMP. (DEG.K)	STACK EXIT VEL. (M/SEC)	STACK DIAMETER (METERS)	BUILDING EXISTS	EMISSION RATE SCALAR VARY BY
S2	0	0.15000E-01	351008.9	3888699.5	1517.1	27.10	0.00	1.00	YES	YES
S5_DC1	0	0.15000E-01	350982.9	3888683.8	1516.8	22.90	0.00	1.00	YES	YES
S5_DC2	0	0.15000E-01	350984.9	3888683.8	1516.8	22.90	0.00	1.00	YES	YES
S4LDT	0	0.15000E-01	350981.3	3888680.0	1516.8	6.10	0.00	1.00	YES	YES
S5LDT	0	0.15000E-01	350983.9	3888685.8	1516.8	6.10	0.00	1.00	YES	YES
S4	0	0.15000E-01	350980.9	3888676.0	1516.8	22.90	0.00	1.00	YES	YES
S1	0	0.15000E-01	351006.9	3888693.2	1517.1	27.10	0.00	1.00	YES	YES
S3	0	0.15000E-01	351011.0	3888705.8	1517.0	27.10	0.00	1.00	YES	YES

\*\*\* VOLUME SOURCE DATA \*\*\*

SOURCE ID	NUMBER EMISSION RATE PART. CATS.	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	EMISSION RATE SCALAR VARY BY
S123LDT	0	0.90000E-02	351011.5	3888696.5	1517.1	6.30	4.95	12.60
SRC2	1	0.10000E-02	351380.0	3888663.0	1520.8	2.50	2.79	2.32
SRC3	1	0.10000E-02	351375.3	3888664.0	1520.8	2.50	2.79	2.32
SRC4	1	0.10000E-02	351369.9	3888665.2	1520.7	2.50	2.79	2.32
SRC5	1	0.10000E-02	351364.4	3888666.5	1520.6	2.50	2.79	2.32
SRC6	1	0.10000E-02	351359.0	3888667.5	1520.6	2.50	2.79	2.32
SRC7	1	0.10000E-02	351353.5	3888668.8	1520.5	2.50	2.79	2.32

SOURCE ID	NUMBER PART. CATS.	EMISSION RATE (GRAMS/SEC)	X (METERS)	Y (METERS)	BASE ELEV. (METERS)	RELEASE HEIGHT (METERS)	INIT. SY (METERS)	INIT. SZ (METERS)	EMISSION RATE SCALAR VARY BY
SRC8	1	0.1000E-02	351348.1	3888670.0	1520.4	2.50	2.79	2.32	
SRC9	1	0.1000E-02	351342.6	3888671.0	1520.4	2.50	2.79	2.32	
SRC10	1	0.1000E-02	351337.1	3888672.2	1520.3	2.50	2.79	2.32	
SRC11	1	0.1000E-02	351331.7	3888673.5	1520.2	2.50	2.79	2.32	
SRC12	1	0.1000E-02	351326.2	3888674.5	1520.1	2.50	2.79	2.32	
SRC13	1	0.1000E-02	351320.8	3888675.8	1520.0	2.50	2.79	2.32	
SRC14	1	0.1000E-02	351315.3	3888677.0	1519.9	2.50	2.79	2.32	
SRC15	1	0.1000E-02	351309.9	3888678.0	1519.8	2.50	2.79	2.32	
SRC16	1	0.1000E-02	351304.4	3888679.2	1519.6	2.50	2.79	2.32	
SRC17	1	0.1000E-02	351298.9	3888680.5	1519.5	2.50	2.79	2.32	
SRC18	1	0.1000E-02	351293.5	3888681.5	1519.4	2.50	2.79	2.32	
SRC19	1	0.1000E-02	351288.0	3888682.8	1519.3	2.50	2.79	2.32	
SRC20	1	0.1000E-02	351282.6	3888683.8	1519.2	2.50	2.79	2.32	
SRC21	1	0.1000E-02	351277.1	3888685.0	1519.1	2.50	2.79	2.32	
SRC22	1	0.1000E-02	351271.6	3888686.2	1519.1	2.50	2.79	2.32	
SRC23	1	0.1000E-02	351266.2	3888687.2	1519.1	2.50	2.79	2.32	
SRC24	1	0.1000E-02	351260.7	3888688.5	1518.9	2.50	2.79	2.32	
SRC25	1	0.1000E-02	351255.2	3888689.5	1518.8	2.50	2.79	2.32	
SRC26	1	0.1000E-02	351249.8	3888690.8	1518.7	2.50	2.79	2.32	
SRC27	1	0.1000E-02	351244.4	3888692.0	1518.6	2.50	2.79	2.32	
SRC28	1	0.1000E-02	351238.9	3888693.0	1518.5	2.50	2.79	2.32	
SRC29	1	0.1000E-02	351233.4	3888694.2	1518.4	2.50	2.79	2.32	
SRC30	1	0.1000E-02	351228.0	3888695.5	1518.4	2.50	2.79	2.32	
SRC31	1	0.1000E-02	351222.8	3888697.0	1518.3	2.50	2.79	2.32	
SRC32	1	0.1000E-02	351219.3	3888701.5	1518.2	2.50	2.79	2.32	
SRC33	1	0.1000E-02	351215.9	3888705.8	1518.1	2.50	2.79	2.32	
SRC34	1	0.1000E-02	351212.5	3888710.2	1518.1	2.50	2.79	2.32	
SRC35	1	0.1000E-02	351211.9	3888715.5	1518.0	2.50	2.79	2.32	
SRC36	1	0.1000E-02	351212.2	3888721.0	1518.0	2.50	2.79	2.32	
SRC37	1	0.1000E-02	351212.6	3888726.5	1518.0	2.50	2.79	2.32	
SRC38	1	0.1000E-02	351212.9	3888732.2	1518.1	2.50	2.79	2.32	
SRC39	1	0.1000E-02	351213.2	3888737.8	1518.1	2.50	2.79	2.32	
SRC40	1	0.1000E-02	351213.6	3888743.2	1518.2	2.50	2.79	2.32	
SRC41	1	0.1000E-02	351212.8	3888748.8	1518.2	2.50	2.79	2.32	
SRC42	1	0.1000E-02	351211.6	3888754.2	1518.2	2.50	2.79	2.32	
SRC43	1	0.1000E-02	351210.4	3888759.8	1518.2	2.50	2.79	2.32	
SRC44	1	0.1000E-02	351209.2	3888765.0	1518.2	2.50	2.79	2.32	
SRC45	1	0.1000E-02	351207.9	3888770.5	1518.2	2.50	2.79	2.32	

\*\*\* VOLUME SOURCE DATA \*\*\*

SRC46	1	0.1000E-02	351206.7	3888776.0	1518.2	2.50	2.79	2.32
SRC47	1	0.1000E-02	351205.5	3888781.5	1518.2	2.50	2.79	2.32
SRC48	1	0.1000E-02	351202.0	3888785.0	1518.1	2.50	2.79	2.32
SRC49	1	0.1000E-02	351196.9	3888787.0	1518.1	2.50	2.79	2.32
SRC50	1	0.1000E-02	351191.7	3888789.2	1518.0	2.50	2.79	2.32
SRC51	1	0.1000E-02	351186.6	3888791.5	1518.0	2.50	2.79	2.32
SRC52	1	0.1000E-02	351181.4	3888793.5	1517.9	2.50	2.79	2.32
SRC53	1	0.1000E-02	351176.2	3888795.5	1517.9	2.50	2.79	2.32
SRC54	1	0.1000E-02	351170.8	3888797.2	1517.9	2.50	2.79	2.32
SRC55	1	0.1000E-02	351165.5	3888798.8	1517.8	2.50	2.79	2.32
SRC56	1	0.1000E-02	351160.2	3888800.5	1517.8	2.50	2.79	2.32
SRC57	1	0.1000E-02	351154.8	3888802.0	1517.7	2.50	2.79	2.32
SRC58	1	0.1000E-02	351149.6	3888802.5	1517.7	2.50	2.79	2.32
SRC59	1	0.1000E-02	351144.5	3888800.2	1517.7	2.50	2.79	2.32
SRC60	1	0.1000E-02	351139.4	3888798.0	1517.7	2.50	2.79	2.32
SRC61	1	0.1000E-02	351139.4	3888792.5	1517.7	2.50	2.79	2.32
SRC62	1	0.1000E-02	351139.6	3888787.0	1517.8	2.50	2.79	2.32
SRC63	1	0.1000E-02	351142.1	3888782.5	1517.8	2.50	2.79	2.32
SRC64	1	0.1000E-02	351146.7	3888779.5	1517.9	2.50	2.79	2.32
SRC65	1	0.1000E-02	351151.3	3888776.2	1517.9	2.50	2.79	2.32
SRC66	1	0.1000E-02	351156.0	3888773.2	1517.9	2.50	2.79	2.32
SRC67	1	0.1000E-02	351160.6	3888770.0	1517.9	2.50	2.79	2.32
SRC68	1	0.1000E-02	351165.5	3888767.5	1518.0	2.50	2.79	2.32
SRC69	1	0.1000E-02	351170.8	3888766.0	1518.0	2.50	2.79	2.32
SRC70	1	0.1000E-02	351176.2	3888764.2	1518.0	2.50	2.79	2.32
SRC71	1	0.1000E-02	351181.5	3888762.8	1518.1	2.50	2.79	2.32
SRC72	1	0.1000E-02	351186.8	3888761.0	1518.1	2.50	2.79	2.32
SRC73	1	0.1000E-02	351192.2	3888759.5	1518.2	2.50	2.79	2.32
SRC74	1	0.1000E-02	351197.5	3888758.0	1518.2	2.50	2.79	2.32
SRC75	1	0.1000E-02	351202.9	3888756.2	1518.2	2.50	2.79	2.32

\*\*\* SOURCE IDs DEFINING SOURCE GROUPS \*\*\*

GROUP ID	SOURCE IDs											
ALL	S2	, S123LDT	, S5_DC1	, S5_DC2	, S4LDT	, S5LDT	, S4	, S1	, S3	, SRC2	, SRC3	, SRC4
	SRC5	, SRC6	, SRC7	, SRC8	, SRC9	, SRC10	, SRC11	, SRC12	, SRC13	, SRC14	, SRC15	, SRC16
	SRC17	, SRC18	, SRC19	, SRC20	, SRC21	, SRC22	, SRC23	, SRC24	, SRC25	, SRC26	, SRC27	, SRC28
	SRC29	, SRC30	, SRC31	, SRC32	, SRC33	, SRC34	, SRC35	, SRC36	, SRC37	, SRC38	, SRC39	, SRC40
	SRC41	, SRC42	, SRC43	, SRC44	, SRC45	, SRC46	, SRC47	, SRC48	, SRC49	, SRC50	, SRC51	, SRC52

SRC53 , SRC54 , SRC55 , SRC56 , SRC57 , SRC58 , SRC59 , SRC60 , SRC61 , SRC62 , SRC63 , SRC64 ,  
 SRC65 , SRC66 , SRC67 , SRC68 , SRC69 , SRC70 , SRC71 , SRC72 , SRC73 , SRC74 , SRC75 ,

\*\*\* THE SUMMARY OF MAXIMUM ANNUAL ( 43800 HRS) RESULTS \*\*\*

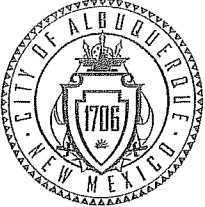
\*\* CONC OF TSP IN MICROGRAMS/M\*\*3 \*\*

GROUP ID	AVERAGE CONC	RECEPTOR (XR, YR, ZELEV, ZFLAG)	OF TYPE	GRID-ID	NETWORK
ALL	13.15442	AT ( 351213.50, 3888693.50, 1518.21, 0.00)	DC	NA	NA
	12.77614	AT ( 351171.56, 3888800.50, 1517.85, 0.00)	DC	NA	NA
	10.41253	AT ( 351302.59, 3888691.75, 1519.48, 0.00)	DC	NA	NA
	10.21326	AT ( 351219.28, 3888785.50, 1518.30, 0.00)	DC	NA	NA
	9.49603	AT ( 351337.19, 3888684.75, 1520.16, 0.00)	DC	NA	NA
	9.38364	AT ( 351262.34, 3888682.75, 1518.97, 0.00)	DC	NA	NA

\*\*\* THE SUMMARY OF HIGHEST 24-HR RESULTS \*\*\*

\*\* CONC OF TSP IN MICROGRAMS/M\*\*3 \*\*

GROUP ID	AVERAGE CONC	DATE (YMMDDHH)	RECEPTOR (XR, YR, ZELEV, ZFLAG)	OF TYPE	NETWORK
ALL	43.77895c	ON 88121624: AT ( 351213.50, 3888693.50, 1518.21, 0.00)	DC	NA	NA
	43.02900c	ON 87011124: AT ( 351213.50, 3888693.50, 1518.21, 0.00)	DC	NA	NA
	38.84134c	ON 89122424: AT ( 351213.50, 3888693.50, 1518.21, 0.00)	DC	NA	NA
	38.78924c	ON 87111924: AT ( 351213.50, 3888693.50, 1518.21, 0.00)	DC	NA	NA
	38.45285c	ON 86020824: AT ( 351213.50, 3888693.50, 1518.21, 0.00)	DC	NA	NA



# City of Albuquerque

## Environmental Health Department

### Air Quality Division

Martin J. Chávez, Mayor

## Modeling Review Checklist

Please fill in the appropriate dates and initial.

Facility Name: <u>559-M3</u> Permit #: _____	Date	Initials
1. AQD replicates modeling numbers submitted for facility Comments: <u>Numbers I got were slightly higher for TSP, but still well w/in standards</u>	<u>3/26</u>	<u>JWD</u>
2. Do UTMs match up with City/County GIS data to within 20 meters? <u>✓</u> Comments: _____	<u>3/26</u>	<u>JWD</u>
3. Met data used for criteria pollutants (circle one): NWS AERMOD: '90-'95 or 1993 ; NWS ISC3: <u>'86 - '90</u> or 1989 Other : _____	<u>3/26</u>	<u>JWD</u>
4. Design concentrations: a. appropriate backgrounds numbers <u>fixed</u> b. used H1H for TSP <u>✓ I did in my reviews</u> c. used H1H, H2H, H6H, H8H, etc per App W (criteria pollutants) <u>✓</u> Comments: <u>Vern reported slightly different results. Maybe he used H2H?</u>	<u>3/26</u>	<u>JWD</u>
5. Sources of large particles w/in 300 meters? <u>yes</u> If so, was a cumulative analysis performed for TSP? <u>yes</u> Do modeled emission rates match permitted (TSP minus PM10) rates for nearby sources? <u>no</u> Comments: <u>0.6 TX factor used to reduce 0.95 to 0.59</u>	<u>3/30</u>	<u>JWD</u>
6. Were max hits for annual and daily PM10 and TSP on the fenceline? <u>yes</u> If not, why not? _____	<u>3/26</u>	<u>JWD</u>
7. Any buildings near the fenceline? <u>yes</u> If so, was building downwash investigated? <u>yes</u>	<u>3/26</u>	<u>JWD</u>
8. Were appropriate particle size distributions used for TSP? PM10? <u>yes</u>	<u>3/26</u>	<u>JWD</u>
9. Were emission factors used? <u>no</u> Fugitives/0.6 factor? _____ Specifying hours with & w/o emissions? _____	<u>3/26</u>	<u>JWD</u>
10. Receptor grid: 50-meter resolution on fenceline? <u>✓</u> Comments: _____	<u>3/26</u>	<u>JWD</u>
11. Fenceline: Is public access really restricted? <u>yes</u> Does the modeled fenceline mirror the shape of property parcel? <u>✓</u>	<u>3/26</u>	<u>JWD</u>
12. Were haul roads modeled according to standard procedure? <u>✓</u> If not, what were the differences and why? _____	<u>3/26</u>	<u>JWD</u>
Additional comments: _____		



# City of Albuquerque

## Environmental Health Department

### Air Quality Division

Martin J. Chávez, Mayor

### Peer review checklist

Please fill in the appropriate dates and initial.

Facility Name:	Permit #:	Date	Initials
1. Inconsistencies between results submitted and results in AQD review?	<i>see discussion</i>	<i>3/26</i>	<i>gwd</i>
2. Inconsistencies w/in AQD review, i.e. among .USF, .GRF, & summary table?		<i>3/30</i>	<i>gwd</i>
3. Inconsistencies in application emissions vs. modeled emissions?	<i>see comments</i>	<i>3/30</i>	<i>gwd</i>
4. Unexplained/mysterious inconsistencies in current permitted emissions vs. modeled emissions?		<i>N/A</i>	<i>gwd</i>
5. Are facility UTMs and address accurate?	<i>✓</i>	<i>3/26</i>	<i>gwd</i>
6. Were the correct design values chosen for the met data used?	<i>✓</i>	<i>3/26</i>	<i>gwd</i>
7. Were appropriate PM backgrounds used?	<i>(not in report; In my review)</i>	<i>3/26</i>	<i>gwd</i>
8. Did cumulative TSP model include all sources of large particles within 300 meters?	<i>✓</i>	<i>3/26</i>	<i>gwd</i>
9. Do emission rates in the AQD review match those reported in the written report submitted to AQD?	<i>yes</i>	<i>3/26</i>	<i>gwd</i>
10.			
11.			
12.			
13.			
14.			
15.			
16.			
17.			
18.			
19. The 0.6 TX factor was used to reduce the			
20. 0.95 lb/hr to 0.59 lb/hr			
21.			
22.			
<i>Application emissions for Silos 1-3 should say 12 with a modeled value of 07</i>			

*✓  
Reagan  
sent email  
to Vern*

**Eyerman, Regan V.**

---

**From:** Eyerman, Regan V.  
**Sent:** Friday, March 27, 2009 10:15 AM  
**To:** 'Vern Choquette'  
**Cc:** Stonesifer, Jeff W.  
**Subject:** FW: Authority-to-Construction Permit Modification Review - American Cement

Vern,

In the course of reviewing the air dispersion modeling for this permit application, our modeling scientist pointed out that the 0.6 Texas factor applied to the emissions for Loadout (Silos 1-3) applies to the modeling only, not the application. This needs to be corrected in the controlled emissions table. Please make this update and send the table back to me at your earliest convenience.

If you have any questions, please do not hesitate to contact me.

Regan Eyerman, EIT  
City of Albuquerque, Air Quality Division  
Environmental Health Scientist  
505-767-5625

-----Original Message-----

**From:** Eyerman, Regan V.  
**Sent:** Thursday, March 19, 2009 1:20 PM  
**To:** 'Vern Choquette'  
**Subject:** RE: Authority-to-Construction Permit Modification Review - American Cement

Vern,

It was good speaking with you today. Your application is complete.

Thank you.

Regan Eyerman, EIT  
City of Albuquerque, Air Quality Division  
Environmental Health Scientist  
505-767-5625

-----Original Message-----

**From:** Vern Choquette [mailto:vchoquet@trinityconsultants.com]  
**Sent:** Thursday, March 19, 2009 9:24 AM  
**To:** Eyerman, Regan V.  
**Cc:** droark@gcc.com  
**Subject:** RE: Authority-to-Construction Permit Modification Review - American Cement

Reagan:

I have attached the background document and highlighted the two ratios (0.314 for PM2.5 and 0.76 for PM10). Trinity rounded up on the PM10 (i.e., 0.80) to present a more conservative estimate of PM10 emissions.

Please let us know if you need anything additional.

(See attached file: AP-42 Background Document.pdf)

Vern Choquette  
Principal Consultant  
Trinity Consultants  
Phone: (405) 228-3292  
Fax: (405) 228-3293



City of Albuquerque  
Environmental Health Department  
Air Quality Division



Martin Chavez, Mayor

John W. Soladay, Director

Interoffice Memorandum

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Request for Air Quality Dispersion Modeling Summary

**Date:** March 23, 2009  
**To:** Jeff Stonesifer, Senior Environmental Health Scientist  
**From:** Regan Eyerman, Environmental Health Scientist RVE  
**Subject:** Execute Air Dispersion Modeling for American Cement Corporation. (permit # 0902-M3) to determine compliance with the NAAQS and NMAAQs for TSP, PM<sub>10</sub>, and PM<sub>2.5</sub>.

**Permit Number:** Air Quality Permit # 0902-M3

**Site Location:** American Cement Terminal, 4702 Carlton Rd, Albuquerque, NM  
UTM: 350955E; 3888364N; Zone:13; NAD 27

**Scope:** American Cement Corporation is proposing to operate their facility continuously. The proposed facility will consist of five storage silos, three loadout spouts and nine dust collectors.

- American Cement Corporation is proposing to operate their facility continuously.
- The process rate for each cement silo is 200 tons per hour.
- The process rate for each flyash silo is 60 tons per hour.
- The process rate for each loadout point is 150 tons per hour.
- The haul road will handle 200 trips per day.
- 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\ 0902-M3

**Model Due Date:** April 3, 2009.

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