

NMED AIR QUALITY NSR SIGNIFICANT REVISION APPLICATION

OLAM WEST COAST INC. OLAM SPICES AND VEGETABLE INGREDIENTS

Prepared By:

Adam Erenstein – Manager of Consulting Services

TRINITY CONSULTANTS

9400 Holly Ave NE
Building 3, Suite B
Albuquerque, NM 87122
(505) 266-6611

On behalf of:

Cindy Xiong – Environmental Director

OLAM WEST COAST INC.

205 E. River Pack Circle
Suite 310
Fresno, CA 93720
(559) 446-6469

January 2025

Project 243201.0063





9400 Holly Ave NE, Bldg 3, Ste B, Albuquerque, NM 87122 / P 505.266.6611 / trinityconsultants.com

January 6, 2025

Permit Programs Manager
NMED Air Quality Bureau
525 Camino de los Marques, Suite 1
Santa Fe, NM 87505

*RE: Application for NSR Significant Revision
OLAM West Coast, Inc. — Olam Spices and Vegetables Ingredients*

Dear Permit Programs Manager:

On behalf of OLAM West Coast, Inc., we are submitting this application for a NSR Significant Revision for the Olam Spices and Vegetables Ingredients Facility. This facility is located within Las Cruces, New Mexico in Doña Ana County and manufactures spice and vegetable bulk materials. Olam spices and Vegetable Ingredients is currently authorized to operate under NSR Permit 1744M4R1.

The format and content of this application are consistent with the Bureau's current policy regarding NSR Significant Revision applications; it is a complete application package using the most current application forms. Enclosed is one hard copy and one working copy of the application, including the original certification page, electronic files, and an application check. Please feel free to contact me at (505) 266-6611 or by email at arenstein@trinityconsultants.com if you have any questions regarding this application. Alternatively, you may contact Cindy Xiong with OLAM West Coast, Inc., at (559) 446-6469 or by email at cindy.xiong@ofi.com.

Sincerely,

TRINITY CONSULTANTS

Adam Erenstein
Manager of Consulting Services

cc: Cindy Xiong (OLAM West Coast, Inc.)

Trinity Project File 243201.0063

HEADQUARTERS

12700 Park Central Dr, Ste 600, Dallas, TX 75251 / P 800.229.6655 / P 972.661.8100 / F 972.385.9203



Air Permit Application Compliance History Disclosure Form

Pursuant to Subsection 74-2-7(S) of the New Mexico Air Quality Control Act ("AQCA"), NMSA §§ 74-2-1 to -17, the New Mexico Environment Department ("Department") may deny any permit application or revoke any permit issued pursuant to the AQCA if, within ten years immediately preceding the date of submission of the permit application, the applicant met any one of the criteria outlined below. In order for the Department to deem an air permit application administratively complete, or issue an air permit for those permits without an administrative completeness determination process, the applicant must complete this Compliance History Disclosure Form as specified in Subsection 74-2-7(P). An existing permit holder (permit issued prior to June 18, 2021) shall provide this Compliance History Disclosure Form to the Department upon request.

Permittee/Applicant Company Name		Expected Application Submittal Date
OLAM West Coast, Inc.		January 6, 2025
Permittee/Company Contact	Phone	Email
Christopher Granados	(575) 449-9785	Christopher.gradados@ofi.com
Within the 10 years preceding the expected date of submittal of the application, has the permittee or applicant:		
1	Knowingly misrepresented a material fact in an application for a permit?	☐ Yes ☒ No
2	Refused to disclose information required by the provisions of the New Mexico Air Quality Control Act?	☐ Yes ☒ No
3	Been convicted of a felony related to environmental crime in any court of any state or the United States?	☐ Yes ☒ No
4	Been convicted of a crime defined by state or federal statute as involving or being in restraint of trade, price fixing, bribery, or fraud in any court of any state or the United States?	☐ Yes ☒ No
5a	Constructed or operated any facility for which a permit was sought, including the current facility, without the required air quality permit(s) under 20.2.70 NMAC, 20.2.72 NMAC, 20.2.74 NMAC, 20.2.79 NMAC, or 20.2.84 NMAC?	☐ Yes ☒ No
5b	If "No" to question 5a, go to question 6. If "Yes" to question 5a, state whether each facility that was constructed or operated without the required air quality permit met at least one of the following exceptions: a. The unpermitted facility was discovered after acquisition during a timely environmental audit that was authorized by the Department; or b. The operator of the facility estimated that the facility's emissions would not require an air permit, and the operator applied for an air permit within 30 calendar days of discovering that an air permit was required for the facility.	☐ Yes ☐ No
6	Had any permit revoked or permanently suspended for cause under the environmental laws of any state or the United States?	☐ Yes ☒ No
7	For each "yes" answer, please provide an explanation and documentation.	

Mail Application To: New Mexico Environment Department Air Quality Bureau Permits Section 525 Camino de los Marquez, Suite 1 Santa Fe, New Mexico, 87505 Phone: (505) 476-4300 Fax: (505) 476-4375 www.env.nm.gov/aqb		For Department use only:
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Universal Air Quality Permit Application

Use this application for NOI, NSR, or Title V sources.

Use this application for: the initial application, modifications, technical revisions, and renewals. For technical revisions, complete Sections, 1-A, 1-B, 2-E, 3, 9 and any other sections that are relevant to the requested action; coordination with the Air Quality Bureau permit staff prior to submittal is encouraged to clarify submittal requirements and to determine if more or less than these sections of the application are needed. Use this application for streamline permits as well.

This application is submitted as (check all that apply): ☐ Request for a No Permit Required Determination (no fee)
☐ **Updating** an application currently under NMED review. Include this page and all pages that are being updated (no fee required).
 Construction Status: ☐ Not Constructed ☒ Existing Permitted (or NOI) Facility ☐ Existing Non-permitted (or NOI) Facility
 Minor Source: ☐ a NOI 20.2.73 NMAC ☒ 20.2.72 NMAC application or revision ☐ 20.2.72.300 NMAC Streamline application
 Title V Source: ☐ Title V (new) ☐ Title V renewal ☐ TV minor mod. ☐ TV significant mod. TV Acid Rain: ☐ New ☐ Renewal
 PSD Major Source: ☐ PSD major source (new) ☐ minor modification to a PSD source ☐ a PSD major modification

Acknowledgements:

- ☒ I acknowledge that a pre-application meeting is available to me upon request. ☐ Title V Operating, Title IV Acid Rain, and NPR applications have no fees.
- ☒ \$500 NSR application Filing Fee enclosed **OR** ☐ The full permit fee associated with 10 fee points (required w/ streamline applications).
- ☒ Check No.: 660455 in the amount of \$500
- ☒ I acknowledge the required submittal format for the hard copy application is printed double sided 'head-to-toe', 2-hole punched (except the Sect. 2 landscape tables is printed 'head-to-head'), numbered tab separators. Incl. a copy of the check on a separate page.
- ☒ I acknowledge there is an annual fee for permits in addition to the permit review fee: www.env.nm.gov/air-quality/permit-fees-2/.
- ☐ This facility qualifies for the small business fee reduction per 20.2.75.11.C. NMAC. The full \$500.00 filing fee is included with this application and I understand the fee reduction will be calculated in the balance due invoice. The Small Business Certification Form has been previously submitted or is included with this application. (Small Business Environmental Assistance Program Information: www.env.nm.gov/air-quality/small-biz-eap-2/.)

Citation: Please provide the **low level citation** under which this application is being submitted: **20.2.72.219.D.(1) NMAC** (e.g. application for a new minor source would be 20.2.72.200.A NMAC, one example for a Technical Permit Revision is 20.2.72.219.B.1.b NMAC, a Title V acid rain application would be: 20.2.70.200.C NMAC)

Section 1 – Facility Information

Section 1-A: Company Information

Section 1-A: Company Information		AI # if known: 350130018	Updating Permit/NOI #: 1744-M4R1
		Plant primary SIC Code (4 digits): 2034	
1	Facility Name: OLAM Spices and Vegetables Ingredients	Plant NAIC code (6 digits): 311423	
a	Facility Street Address (If no facility street address, provide directions from a prominent landmark): 1650 W. Amador Ave, Las Cruces, NM 88005		
2	Plant Operator Company Name: OLAM Spices and Vegetables Ingredients	Phone/Fax: 575-528-6228	

a	Plant Operator Address: 1650 W. Amador Ave, Las Cruces, NM 88005	
b	Plant Operator's New Mexico Corporate ID or Tax ID:	
3	Plant Owner(s) name(s): OLAM West Coast, Inc.	Phone/Fax: 559-447-1390
a	Plant Owner(s) Mailing Address(s): 205 E. River Park Circle Suite 310, Fresno, CA 93720	
4	Bill To (Company): OLAM Spices and Vegetables Ingredients	Phone/Fax: 575-449-9785
a	Mailing Address: 1650 W Amador, Las Cruces NM, 88005	E-mail: Christopher.gradados@ofi.com
5	☒ Preparer: Trinity Consultants, Inc. ☒ Consultant: Adam Erenstein	Phone/Fax: 505-266-6611
a	Mailing Address: 9400 Holly Avenue NE, Building 3, Suite B, Albuquerque, NM 87122	E-mail: aerenstein@trinityconsultants.com
6	Plant Operator Contact: Christopher Granados	Phone/Fax: 575-449-9785
a	Address: 1650 W Amador, Las Cruces NM, 88005	E-mail: Christopher.gradados@ofi.com
7	Air Permit Contact: Cindy Xiong	Title: Environmental Director
a	E-mail: cindy.xiong@ofi.com	Phone/Fax: 559-446-6469
b	Mailing Address: 205 E. River Park Circle Suite 310, Fresno, CA 93720	
c	The designated Air permit Contact will receive all official correspondence (i.e. letters, permits) from the Air Quality Bureau.	

Section 1-B: Current Facility Status

1.a	Has this facility already been constructed? ☒ Yes ☐ No	1.b If yes to question 1.a, is it currently operating in New Mexico? ☒ Yes ☐ No
2	If yes to question 1.a, was the existing facility subject to a Notice of Intent (NOI) (20.2.73 NMAC) before submittal of this application? ☐ Yes ☒ No	If yes to question 1.a, was the existing facility subject to a construction permit (20.2.72 NMAC) before submittal of this application? ☒ Yes ☐ No
3	Is the facility currently shut down? ☐ Yes ☒ No	If yes, give month and year of shut down (MM/YY): N/A
4	Was this facility constructed before 8/31/1972 and continuously operated since 1972? ☒ Yes ☐ No	
5	If Yes to question 3, has this facility been modified (see 20.2.72.7.P NMAC) or the capacity increased since 8/31/1972? ☐ Yes ☐ No ☒ N/A	
6	Does this facility have a Title V operating permit (20.2.70 NMAC)? ☐ Yes ☒ No	If yes, the permit No. is: P- N/A
7	Has this facility been issued a No Permit Required (NPR)? ☐ Yes ☒ No	If yes, the NPR No. is: N/A
8	Has this facility been issued a Notice of Intent (NOI)? ☐ Yes ☒ No	If yes, the NOI No. is: N/A
9	Does this facility have a construction permit (20.2.72/20.2.74 NMAC)? ☒ Yes ☐ No	If yes, the permit No. is: 1744-M4R1
10	Is this facility registered under a General permit (GCP-1, GCP-2, etc.)? ☐ Yes ☒ No	If yes, the register No. is: N/A

Section 1-C: Facility Input Capacity & Production Rate

1	What is the facility's maximum input capacity, specify units (reference here and list capacities in Section 20, if more room is required)			
a	Current	Hourly: 67,550 lb/hr	Daily: 1,621,200 lb/day	Annually: 591,738,000 lb/yr
b	Proposed	Hourly: 67,550 lb/hr	Daily: 1,621,200 lb/day	Annually: 591,738,000 lb/yr
2	What is the facility's maximum production rate, specify units (reference here and list capacities in Section 20, if more room is required)			

a	Current	Hourly: 67,550 lb/hr	Daily: 1,621,200 lb/day	Annually: 591,738,000 lb/yr
b	Proposed	Hourly: 67,550 lb/hr	Daily: 1,621,200 lb/day	Annually: 591,738,000 lb/yr

Section 1-D: Facility Location Information

1	Section: 13	Range: 1E	Township: 22S	County: Dona Ana	Elevation (ft): 3890
2	UTM Zone: ☐ 12 or ☒ 13			Datum: ☐ NAD 27 ☐ NAD 83 ☒ WGS 84	
a	UTM E (in meters, to nearest 10 meters): 330,688.86			UTM N (in meters, to nearest 10 meters): 3,575,435.31	
b	AND Latitude (deg., min., sec.): 32° 18' 10.584"			Longitude (deg., min., sec.): - 106° 47' 58.916"	
3	Name and zip code of nearest New Mexico town: Las Cruces, 88005				
4	Detailed Driving Instructions from nearest NM town (attach a road map if necessary): Facility is located within Las Cruces city boundaries. Take I-25 south, exit #6/LAS CRUCES/ALAMOGORDO, turn Right on N MAIN ST(US-70 W), turn Right on W PICACHO AVE (US-70 W), turn Left on N VALLEY DR, turn Right on W AMADOR AVE (NM-342 W), arrive at 1650 W AMADOR AVE on the right.				
5	The facility is N/A (distance) miles N/A (direction) of N/A (nearest town). This Facility is located within Las Cruces city boundaries.				
6	Status of land at facility (check one): ☒ Private ☐ Indian/Pueblo ☐ Federal BLM ☐ Federal Forest Service ☐ Other (specify)				
7	List all municipalities, Indian tribes, and counties within a ten (10) mile radius (20.2.72.203.B.2 NMAC) of the property on which the facility is proposed to be constructed or operated: City of Las Cruces, Town of Mesilla, Dona Ana County, no Indian Tribes are within a 10-mile area.				
8	20.2.72 NMAC applications only: Will the property on which the facility is proposed to be constructed or operated be closer than 50 km (31 miles) to other states, Bernalillo County, or a Class I area (see www.env.nm.gov/air-quality/modeling-publications/)? ☒ Yes ☐ No (20.2.72.206.A.7 NMAC) If yes, list all with corresponding distances in kilometers:				
9	Name nearest Class I area: Gila Wilderness				
10	Shortest distance (in km) from facility boundary to the boundary of the nearest Class I area (to the nearest 10 meters): 143.0 km				
11	Distance (meters) from the perimeter of the Area of Operations (AO is defined as the plant site inclusive of all disturbed lands, including mining overburden removal areas) to nearest residence, school or occupied structure: Nearest School is Children's Garden, 663 meters southeast. Nearest occupied structure is the neighboring business, 72 meters east.				
12	Method(s) used to delineate the Restricted Area: Continuous fencing. There are no public roads within the Restricted Area. "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 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.				
13	Does the owner/operator intend to operate this source as a portable stationary source as defined in 20.2.72.7.X NMAC? ☐ Yes ☒ No A portable stationary source is not a mobile source, such as an automobile, but a source that can be installed permanently at one location or that can be re-installed at various locations, such as a hot mix asphalt plant that is moved to different job sites.				
14	Will this facility operate in conjunction with other air regulated parties on the same property? ☒ No ☐ Yes If yes, what is the name and permit number (if known) of the other facility? N/A				

Section 1-E: Proposed Operating Schedule (The 1-E.1 & 1-E.2 operating schedules may become conditions in the permit.)

1	Facility maximum operating ($\frac{\text{hours}}{\text{day}}$): 24	($\frac{\text{days}}{\text{week}}$): 7	($\frac{\text{weeks}}{\text{year}}$): 52	($\frac{\text{hours}}{\text{year}}$): 8760
2	Facility's maximum daily operating schedule (if less than 24 $\frac{\text{hours}}{\text{day}}$)? Start: N/A		☐ AM ☐ PM	End: N/A ☒ AM ☒ PM
3	Month and year of anticipated start of construction: TBD			

4	Month and year of anticipated construction completion: TBD
5	Month and year of anticipated startup of new or modified facility: TBD
6	Will this facility operate at this site for more than one year? ☒ Yes ☐ No

Section 1-F: Other Facility Information

1	Are there any current Notice of Violations (NOV), compliance orders, or any other compliance or enforcement issues related to this facility? ☐ Yes ☒ No If yes, specify: N/A		
a	If yes, NOV date or description of issue: N/A	NOV Tracking No: N/A	
b	Is this application in response to any issue listed in 1-F, 1 or 1a above? ☐ Yes ☒ No If Yes, provide the 1c & 1d info below:		
c	Document Title: N/A	Date: N/A	Requirement # (or page # and paragraph #): N/A
d	Provide the required text to be inserted in this permit: N/A		
2	Is air quality dispersion modeling or modeling waiver being submitted with this application? ☒ Yes ☐ No		
3	Does this facility require an "Air Toxics" permit under 20.2.72.400 NMAC & 20.2.72.502, Tables A and/or B? ☐ Yes ☒ No		
4	Will this facility be a source of federal Hazardous Air Pollutants (HAP)? ☒ Yes ☐ No		
a	If Yes, what type of source? ☐ Major (☐ ≥10 tpy of any single HAP OR ☐ ≥25 tpy of any combination of HAPS) OR ☒ Minor (☒ <10 tpy of any single HAP AND ☒ <25 tpy of any combination of HAPS)		
5	Is any unit exempt under 20.2.72.202.B.3 NMAC? ☐ Yes ☒ No		
a	If yes, include the name of company providing commercial electric power to the facility: <u>El Paso Electric Company</u> Commercial power is purchased from a commercial utility company, which specifically does not include power generated on site for the sole purpose of the user.		

Section 1-G: Streamline Application (This section applies to 20.2.72.300 NMAC Streamline applications only)

1	☐ I have filled out Section 18, "Addendum for Streamline Applications." ☒ N/A (This is not a Streamline application.)
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Section 1-I – Submittal Requirements

Each 20.2.73 NMAC (**NOI**), a 20.2.70 NMAC (**Title V**), a 20.2.72 NMAC (**NSR** minor source), or 20.2.74 NMAC (**PSD**) application package shall consist of the following:

Hard Copy Submittal Requirements:

- 1) One hard copy **original signed and notarized application package printed double sided 'head-to-toe' 2-hole punched** as we bind the document on top, not on the side; except Section 2 (landscape tables), which should be **head-to-head**. Please use **numbered tab separators** in the hard copy submittal(s) as this facilitates the review process. For NOI submittals only, hard copies of UA1, Tables 2A, 2D & 2F, Section 3 and the signed Certification Page are required. **Please include a copy of the check on a separate page.**
- 2) If the application is for a minor NSR, PSD, NNSR, or Title V application, include one working hard **copy** for Department use. This **copy** should be printed in book form, 3-hole punched, and **must be double sided**. Note that this is in addition to the head-to-toe 2-hole punched copy required in 1) above. Minor NSR Technical Permit revisions (20.2.72.219.B NMAC) only need to fill out Sections 1-A, 1-B, 3, and should fill out those portions of other Section(s) relevant to the technical permit revision. TV Minor Modifications need only fill out Sections 1-A, 1-B, 1-H, 3, and those portions of other Section(s) relevant to the minor modification. NMED may require additional portions of the application to be submitted, as needed.
- 3) The entire NOI or Permit application package, including the full modeling study, should be submitted electronically. Electronic files for applications for NOIs, any type of General Construction Permit (GCP), or technical revisions to NSRs must be submitted with compact disk (CD) or digital versatile disc (DVD). For these permit application submittals, **two CD** copies are required (in sleeves, not crystal cases, please), with additional CD copies as specified below. NOI applications require only a **single CD** submittal. Electronic files for other New Source Review (construction) permits/permit modifications or Title V permits/permit modifications can be submitted on CD/DVD or sent through AQB's secure file transfer service.

Electronic files sent by (check one):

- ☐ CD/DVD attached to paper application
- ☒ secure electronic transfer. Air Permit Contact: Adam Erenstein, (505) 266-6611, aerenstein@trinityconsultants.com
 - a. If the file transfer service is chosen by the applicant, after receipt of the application, the Bureau will email the applicant with instructions for submitting the electronic files through a secure file transfer service. Submission of the electronic files through the file transfer service needs to be completed within 3 business days after the invitation is received, so the applicant should ensure that the files are ready when sending the hard copy of the application. The applicant will not need a password to complete the transfer. **Do not use the file transfer service for NOIs, any type of GCP, or technical revisions to NSR permits.**
- 4) Optionally, the applicant may submit the files with the application on compact disk (CD) or digital versatile disc (DVD) following the instructions above and the instructions in 5 for applications subject to PSD review.
- 5) If **air dispersion modeling** is required by the application type, include the **NMED Modeling Waiver** and/or electronic air dispersion modeling report, input, and output files. The dispersion modeling **summary report only** should be submitted as hard copy(ies) unless otherwise indicated by the Bureau.
- 6) If the applicant submits the electronic files on CD and the application is subject to PSD review under 20.2.74 NMAC (PSD) or NNSR under 20.2.79 NMC include,
 - a. one additional CD copy for US EPA,
 - b. one additional CD copy for each federal land manager affected (NPS, USFS, FWS, USDI) and,
 - c. one additional CD copy for each affected regulatory agency other than the Air Quality Bureau.

If the application is submitted electronically through the secure file transfer service, these extra CDs do not need to be submitted.

Electronic Submittal Requirements [in addition to the required hard copy(ies)]:

- 1) All required electronic documents shall be submitted as 2 separate CDs or submitted through the AQB secure file transfer service. Submit a single PDF document of the entire application as submitted and the individual documents comprising the application.
- 2) The documents should also be submitted in Microsoft Office compatible file format (Word, Excel, etc.) allowing us to access the

text and formulas in the documents (copy & paste). Any documents that cannot be submitted in a Microsoft Office compatible format shall be saved as a PDF file from within the electronic document that created the file. If you are unable to provide Microsoft office compatible electronic files or internally generated PDF files of files (items that were not created electronically: i.e. brochures, maps, graphics, etc.), submit these items in hard copy format. We must be able to review the formulas and inputs that calculated the emissions.

- 3) It is preferred that this application form be submitted as 4 electronic files (**3 MSWord docs**: Universal Application section 1 [UA1], Universal Application section 3-19 [UA3], and Universal Application 4, the modeling report [UA4]) and **1 Excel file** of the tables (Universal Application section 2 [UA2]). Please include as many of the 3-19 Sections as practical in a single MS Word electronic document. Create separate electronic file(s) if a single file becomes too large or if portions must be saved in a file format other than MS Word.
- 4) The **electronic file names** shall be a maximum of 25 characters long (including spaces, if any). The format of the electronic Universal Application shall be in the format: "A-3423-FacilityName". The "A" distinguishes the file as an application submittal, as opposed to other documents the Department itself puts into the database. Thus, all electronic application submittals should begin with "A-". Modifications to existing facilities should use the **core permit number** (i.e. '3423') the Department assigned to the facility as the next 4 digits. Use 'XXXX' for new facility applications. The format of any separate electronic submittals (additional submittals such as non-Word attachments, re-submittals, application updates) and Section document shall be in the format: "A-3423-9-description", where "9" stands for the **section #** (in this case Section 9-Public Notice). Please refrain, as much as possible, from submitting any scanned documents as this file format is extremely large, which uses up too much storage capacity in our database. Please take the time to fill out the **header information** throughout all submittals as this will identify any loose pages, including the Application Date (date submitted) & Revision number (0 for original, 1, 2, etc.; which will help keep track of subsequent partial update(s) to the original submittal. Do not use special symbols (#, @, etc.) in file names. The footer information should not be modified by the applicant.

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Table 2-A: Regulated Emission Sources

Unit and stack numbering must correspond throughout the application package. If applying for a NOI under 20.2.73 NMAC, equipment exemptions under 2.72.202 NMAC do not apply.

Unit Number ¹	Source Description	Make	Model #	Serial #	Manufacturer's Rated Capacity ² (Specify Units)	Requested Permitted Capacity ² (Specify Units)	Date of Manufacture ² Date of Construction/ Reconstruction ²	Controlled by Unit # Emissions vented to Stack #	Source Classification Code (SCC)	For Each Piece of Equipment, Check One	RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB) ⁴	Replacing Unit No.
BB-1	Boiler Burner	Dixon	SK-10	Dixon	8.4 MMBtu/hr	8.4 MMBtu/hr	1985	-	30290003	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
BB-1	Boiler Burner	Cleaver Brooks	CBI-200 150-150	0L1105464	6.1 MMBtu/hr	6.1 MMBtu/hr	2006	-	30290003	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	BB-1
BB-2	Boiler Burner	ABCO	200AMC	7950200	8.4 MMBtu/hr	8.4 MMBtu/hr	2001*	-	30290003	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
BB-3	Boiler Burner	Industry Combustion	3G	6807001	4.2 MMBtu/hr	4.2 MMBtu/hr	2001*	-	30290003	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
BB-4	Boiler Burner	TBD	TBD	TBD	6.4 MMBtu/hr	6.4 MMBtu/hr	2010	-	30290003	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
BB-4	Boiler Burner	Cleaver Brooks	CFH-700- 50-150ST	16021005010109	2 MMBtu/hr	2 MMBtu/hr	TBD	-	30290003	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	BB-4
BB-5	Boiler Burner	TBD	TBD	TBD	8.4 MMBtu/hr	8.4 MMBtu/hr	TBD	-	30290003	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
BB-6	Boiler Burner	Cleaver Brooks	CFH-700- 50-150ST	160211000010246	2 MMBtu/hr	2 MMBtu/hr	TBD	-	30290003	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
Bagline-1	Packaging Line	-	-	-	4000 lb/hr	4000 lb/hr	1999	BH#6 6	30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
Bagline-2	Packaging Line	-	-	-	4000 lb/hr	4000 lb/hr	1999	BH#6 6	30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
C-BL	Three Cooking Blenders	American Process and AP Scott	270, 270X	545-9MS, 4885	24000 lb/hr	24000 lb/hr	2001*	BH#4 4	30299998	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
Carton Line	Packaging Line	-	-	-	4000 lb/hr	4000 lb/hr	1999	BH#6 6	30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
DC-1	Process Dust Collection	Kice Industries	VS100-10	1472871	-	-	2001*	BH#10 10	30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
DC-2	Process Dust Collection	Kice Industries	S100-10	810-840-492	-	-	2001*	BH#8 8	30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
DrumLine- 1	Packaging Line	-	-	-	4000 lb/hr	4000 lb/hr	1999	BH#6 6	30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
DrumLine- 2	Packaging Line	-	-	-	4000 lb/hr	4000 lb/hr	1999	BH#6 6	30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	
F-BL	Three Finishing Blenders	Shop Built	-	-	2400 lb/hr	2400 lb/hr	2001*	BH#7 7	30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ Replacement Unit	N/A	

Table 2-A: Regulated Emission Sources

Unit and stack numbering must correspond throughout the application package. If applying for a NOI under 20.2.73 NMAC, equipment exemptions under 2.72.202 NMAC do not apply.

Unit Number ¹	Source Description	Make	Model #	Serial #	Manufacturer's Rated Capacity ² (Specify Units)	Requested Permitted Capacity ² (Specify Units)	Date of Manufacture ²	Controlled by Unit #		Source Classification Code (SCC)	For Each Piece of Equipment, Check One	RICE Ignition Type (CI, SI, 4SLB, 4SRB, 2SLB) ⁴	Replacing Unit No.
								Emissions	vented to Stack #				
F-HP	Three Final Cooker/Blender Hoppers	-	-	-	2400 lb/hr	2400 lb/hr	2001*	BH#5		30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	
GB-1	Dryer #1 (Cryo) Vegetable Dryer with 12 gas-fired burners	Proctor and Schwartz	Packaged Dryer	K23274	29.6 MMBtu/hr	29.6 MMBtu/hr	1985	-	JAI TO 3, 1BL 1CL	30290003	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	
GB-2	Dryer #2 (Cryo) Vegetable Dryer with 10 gas-fired burners	Proctor and Schwartz	Packaged Dryer	K22507	24.6 MMBtu/hr	24.6 MMBtu/hr	1975	-	2A1 TO 3, 2B1	30290003	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	
M-1	Mill No. 1 (Proctor Mill)	Prater	MM-36	288168	7500 lb/hr	7500 lb/hr	1996*	BH#1		30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	
M-3	Mill No. 3 (OP Mill)	Prater	MM-36	-	7500 lb/hr	7500 lb/hr	1996* Aug-92	BH#3	1	30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	
M-4	Mill No. 4 (Finish Mill)	Bauermeister	UT	-	8000 lb/hr	8000 lb/hr	Sept 2005*	BH#6		30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	
M-5	Mill No. 5 (Finish Mill)	Bauermeister	UT	10080	8000 lb/hr	8000 lb/hr	Sept 2005*	BH#6		30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	
M-6	Mill No. 6 (Finish Mill)	Bauermeister	UT	-	8000 lb/hr	8000 lb/hr	Sept 2005*	BH#6		30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	
M-7	Mill No. 7 (Finish Mill)	Jacobson	17-D	-	2200 lb/hr	2200 lb/hr	Sept 2005*	BH#9		30299998	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	
M-7	Mill No. 7 (Finish Mill)	Bauermeister	UT33	7362	8000 lb/hr	8000 lb/hr		BH#6		30299998	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ To Be Replaced	N/A	M-7
M-8	Mill No. 8 (Cryo Mill)	Pulva Cryogenic	C304	-	2000 lb/hr	2000 lb/hr	2006	-		30299998	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ To Be Replaced	N/A	
P-BL	Proctor Blender	-	-	-	7500 lb/hr	7500 lb/hr	1996	BH#3		30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	
SS-1	Steam Sterilizer	Bennett Corp. Porcupine Processor	1P3018JT C	N/A	10 ton/hr	10 ton/hr	1998	BH#11		30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	
SS-2	Steam Sterilizer	Raphael	RS2C	16	10 ton/hr	10 ton/hr	2010	11		30299998	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	
SS-2	Steam Sterilizer	Safesteril	TBD	TBD	10 ton/hr	10 ton/hr	2015	12A, 12B		30299998	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ To Be Replaced	N/A	
Tote Line	Packaging Line	-	-	-	4000 lb/hr	4000 lb/hr	TBD			30299998	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ To Be Replaced	N/A	SS-2
SD1-4	Four Seed Dryers	Eclipse Burners	Shop Built	4MM-2046-D10	2.0 MMBtu/hr	2.0 MMBtu/hr	1999	BH#5	5	30299998	☒ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☒ To Be Replaced	N/A	
							1999	-		30290003	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ To Be Removed ☐ To Be Replaced	N/A	

¹ Unit numbers must correspond to unit numbers in the previous permit unless a complete cross reference table of all units in both permits is provided.² Specify dates required to determine regulatory applicability.³ To properly account for power conversion efficiencies, generator set rated capacity shall be reported as the rated capacity of the engine in horsepower, not the kilowatt capacity of the generator set.⁴ "4SLB" means four stroke lean burn engine, "4SRB" means four stroke rich burn engine, "2SLB" means two stroke lean burn engine, "CI" means compression ignition, and "SI" means spark ignition

* Reconstruction Date

Table 2-B: Insignificant Activities¹ (20.2.70 NMAC) OR Exempted Equipment (20.2.72 NMAC)

All 20.2.70 NMAC (Title V) applications must list all Insignificant Activities in this table. All 20.2.72 NMAC applications must list Exempted Equipment in this table. If equipment listed on this table is exempt under 20.2.72.202.B.5, include emissions calculations and emissions totals for 202.B.5 "similar functions" units, operations, and activities in Section 6, Calculations. Equipment and activities exempted under 20.2.72.202 NMAC may not necessarily be Insignificant under 20.2.70 NMAC (and vice versa). Unit & stack numbering must be consistent throughout the application package. Per Exemptions Policy 02-012.00 (see http://www.env.nm.gov/aqb/permit/aqb_pol.html), 20.2.72.202.B NMAC Exemptions do not apply, but 20.2.72.202.A NMAC exemptions do apply to NOI facilities under 20.2.73 NMAC. List 20.2.72.301.D.4 NMAC Auxiliary Equipment for Streamline applications in Table 2-A. The List of Insignificant Activities (for TV) can be found online at <https://www.env.nm.gov/wp-content/uploads/sites/2/2017/10/InsignificantListTitleV.pdf>. TV sources may elect to enter both TV Insignificant Activities and Part 72 Exemptions on this form.

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)	Date of Manufacture /Reconstruction ²	For Each Piece of Equipment, Check One		
			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)	Date of Installation /Construction ²	☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged) ☐ New/Additional ☐ To Be Modified ☐ Existing (unchanged		

Table 2-C: Emissions Control Equipment

Unit and stack numbering must correspond throughout the application package. Only list control equipment for TAPs if the TAP's maximum uncontrolled emissions rate is over its respective threshold as listed in 20.2.72.200.B(7) NMAC, Subpart V, Tables A and B. In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.73.200.B(7) NMAC, and 20.2.73.200.D(5)(b) and (e) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device regardless if the applicant takes credit for the reduction in emissions.

[illegible]

¹ List each control device on a separate line. For each control device, list all emission units controlled by the control device.

Table 2-D: Maximum Emissions (under normal operating conditions)

☐ This Table was intentionally left blank because it would be identical to Table 2-E.

Maximum Emissions are the emissions at maximum capacity and prior to (in the absence of) pollution control, emission-reducing process equipment, or any other emission reduction. Calculate the hourly emissions using the worst case hourly emissions for each pollutant. For each pollutant, calculate the annual emissions as if the facility were operating at maximum plant capacity without pollution controls for 8760 hours per year, unless otherwise approved by the Department. List Hazardous Air Pollutants (HAP) & Toxic Air Pollutants (TAPs) in Table 2-I. Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "-". symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E-4).

Unit No.	NOx		CO		VOC		SOx		PM ¹		PM10 ¹		PM2.5 ¹		H ₂ S		Lead	
	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
BB-1	0.60	2.63	0.50	2.21	0.033	0.14	0.034	0.15	0.046	0.20	0.046	0.20	0.046	0.20	-	-	-	-
BB-4	0.20	0.86	0.16	0.72	0.011	0.047	0.011	0.049	0.015	0.065	0.015	0.065	0.015	0.065	-	-	-	-
BB-6	0.20	0.86	0.16	0.72	0.011	0.047	0.011	0.049	0.015	0.065	0.015	0.065	0.015	0.065	-	-	-	-
BagLine-1	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	4.05E-03	0.018	-	-	-	-
BagLine-2	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	4.05E-03	0.018	-	-	-	-
C-BL	-	-	-	-	-	-	-	-	151.20	662.26	68.04	298.02	17.01	74.50	-	-	-	-
Carton Line	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	4.05E-03	0.018	-	-	-	-
DC-1	-	-	-	-	-	-	-	-	2.21	9.66	0.99	4.35	0.25	1.09	-	-	-	-
DC-2	-	-	-	-	-	-	-	-	64.80	283.82	29.16	127.72	7.29	31.93	-	-	-	-
DrumLine-1	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	4.05E-03	0.018	-	-	-	-
DrumLine-2	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	4.05E-03	0.018	-	-	-	-
F-BL	-	-	-	-	-	-	-	-	64.80	283.82	29.16	127.72	7.29	31.93	-	-	-	-
F-HP	-	-	-	-	-	-	-	-	64.80	283.82	29.16	127.72	7.29	31.93	-	-	-	-
GB-1	2.90	12.71	2.44	10.68	0.16	0.70	0.17	0.73	0.22	0.97	0.22	0.97	0.22	0.97	-	-	-	-
GB-2	2.41	10.56	2.03	8.87	0.13	0.58	0.14	0.60	0.18	0.80	0.18	0.80	0.18	0.80	-	-	-	-
M-1	-	-	-	-	-	-	-	-	20.25	88.70	9.11	39.91	2.28	9.98	-	-	-	-
M-3	-	-	-	-	-	-	-	-	40.50	177.39	18.23	79.83	4.56	19.96	-	-	-	-
M-4	-	-	-	-	-	-	-	-	21.60	94.61	9.72	42.57	2.43	10.64	-	-	-	-
M-5	-	-	-	-	-	-	-	-	21.60	94.61	9.72	42.57	2.43	10.64	-	-	-	-
M-6	-	-	-	-	-	-	-	-	21.60	94.61	9.72	42.57	2.43	10.64	-	-	-	-
M-7	-	-	-	-	-	-	-	-	43.20	94.63	19.44	43.02	4.86	10.89	-	-	-	-
P-BL	-	-	-	-	-	-	-	-	20.25	88.70	9.11	39.91	2.28	9.98	-	-	-	-
SS-1	-	-	-	-	-	-	-	-	432.00	1892.16	194.40	851.47	48.60	212.87	-	-	-	-
SS-2	-	-	-	-	-	-	-	-	108.00	473.04	48.60	212.87	12.15	53.22	-	-	-	-
Tote Line	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	4.05E-03	0.018	-	-	-	-
Totals	6.31	27.62	5.30	23.20	0.35	1.52	0.36	1.58	1077.50	4624.86	485.14	2082.78	121.64	522.41	-	-	-	-

¹Condensable Particulate Matter: Include condensable particulate matter emissions for PM10 and PM2.5 if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM10 and PM2.5. Particulate matter (PM) is not subject to an ambient air quality standard, but PM is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

Unit & stack numbering must be consistent throughout the application package. Fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected. Numbers shall be expressed to at least 2 decimal points (e.g. 0.41, 1.41, or 1.41E⁻⁴).

[illegible]

¹**Condensable Particulate Matter:** include condensable particulate matter emissions for PM₁₀ and PM_{2.5} if the source is a combustion source. Do not include condensable particulate matter for PM unless PM is set equal to PM₁₀ and PM_{2.5}. Particulate matter (PM) is not subject to an ambient air quality standard, but it is a regulated air pollutant under PSD (20.2.74 NMAC) and Title V (20.2.70 NMAC).

Table 2-G: Stack Exit and Fugitive Emission Rates for Special Stacks

☐ I have elected to leave this table blank because this facility does not have any stacks/vents that split emissions from a single source or combine emissions from more than one source listed in table 2-A. Additionally, the emission rates of all stacks match the Requested allowable emission rates stated in Table 2-E.

Use this table to list stack emissions (requested allowable) from split and combined stacks. List Toxic Air Pollutants (TAPs) and Hazardous Air Pollutants (HAPs) in Table 2-I. List all fugitives that are associated with the normal, routine, and non-emergency operation of the facility. Unit and stack numbering must correspond throughout the application package. Refer to Table 2-E for instructions on use of the “-” symbol and on significant figures.

Stack No.	Serving Unit Number(s) from Table 2-A	NO _x		CO		VOC		SO _x		PM		PM ₁₀		PM _{2.5}		H ₂ S or □Lead	
		lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr	lb/hr	ton/yr
3	M-3, P-BL	-	-	-	-	-	-	-	-	0.061	0.27	0.027	0.12	6.83E-03	0.030	-	-
4	C-BL	-	-	-	-	-	-	-	-	0.15	0.66	0.068	0.30	0.017	0.075	-	-
5	Tote Line, F-HP	-	-	-	-	-	-	-	-	0.10	0.44	0.045	0.20	0.011	0.050	-	-
6	M-4, M-5, M-6, M-7, Bag Lines (2), Carton Line, Drum Lines (2)	-	-	-	-	-	-	-	-	0.29	1.25	0.13	0.56	0.032	0.14	-	-
7	F-BL	-	-	-	-	-	-	-	-	0.065	0.28	0.029	0.13	7.29E-03	0.032	-	-
8	DC-2	-	-	-	-	-	-	-	-	0.065	0.28	0.029	0.13	7.29E-03	0.032	-	-
12A	SS-2	-	-	-	-	-	-	-	-	0.016	0.079	7.09E-03	0.035	1.77E-03	8.87E-03	-	-
12B	SS-2	-	-	-	-	-	-	-	-	0.016	0.079	7.09E-03	0.035	1.77E-03	8.87E-03	-	-
1A1	GB-1 (GB 1A-1)	0.51	2.23	0.43	1.88	0.028	0.12	3.10E-03	0.013	0.039	0.17	0.039	0.17	0.039	0.17	-	-
1A2	GB-1 (GB 1A-2A, GB 1A-2B)	0.71	3.09	0.59	2.60	0.039	0.17	4.20E-03	0.019	0.054	0.23	0.054	0.23	0.054	0.23	-	-
1A3	GB-1 (GB 1A-3A, GB 1A-3B, GB 1A-4, GB 1A-5)	1.06	4.64	0.89	3.90	0.058	0.26	6.40E-03	0.03	0.080	0.35	0.080	0.35	0.080	0.35	-	-
1B1	GB-1 (GB 1B-1, GB 1B-2)	0.39	1.72	0.33	1.44	0.022	0.090	2.40E-03	0.010	0.030	0.13	0.030	0.13	0.030	0.13	-	-
1C1	GB-1 (GB 1C-1, GB 1C-2, GB 1C-3)	0.24	1.03	0.20	0.87	0.013	0.057	1.40E-03	6.00E-03	0.018	0.078	0.018	0.078	0.018	0.08	-	-
2A1	GB-2 (GB 2A-1)	0.88	3.86	0.74	3.25	0.049	0.21	5.30E-03	0.023	0.067	0.29	0.067	0.29	0.067	0.29	-	-
2A2	GB-2 (GB 2A-2A, GB 2A-2B)	0.55	2.40	0.46	2.02	0.030	0.13	3.30E-03	0.014	0.042	0.18	0.042	0.18	0.042	0.18	-	-
2A3	GB-2 (GB 2A-3A, GB 2A-3B)	0.47	2.06	0.40	1.73	0.026	0.11	2.80E-03	0.012	0.036	0.16	0.036	0.16	0.036	0.16	-	-
2B1	GB-2 (GB 2B-1, GB 2B-2, GB 2C-1, GB 2C-2, GB 2C-3)	0.51	2.23	0.43	1.88	0.028	0.12	3.10E-03	0.013	0.039	0.17	0.039	0.17	0.039	0.17	-	-
Totals:		5.32	24.13	4.47	20.31	0.29	1.33	0.03	0.14	1.17	4.60	0.75	3.08	0.49	2.15		

Table 2-H: Stack Exit Conditions

Unit and stack numbering must correspond throughout the application package. Include the stack exit conditions for each unit that emits from a stack, including blowdown venting parameters and tank emissions. If the facility has multiple operating scenarios, complete a separate Table 2-H for each scenario and, for each, type scenario name here:

Stack Number	Serving Unit Number(s) from Table 2-A	Orientation Horizontal V=Vertical	Rain Caps (Yes or No)	Height Above Ground (ft)	Temp. (F)	Flow Rate		Moisture by Volume (%)	Velocity (ft/sec)	Inside Diameter (ft)
						(acfs)	(dscfs)			
B1	BB-1	V	N	24	600	73	28	0	52.34	1.33
B4	BB-4	V	N	24	600	24	9	0	43.76	0.83
B6	BB-6	V	N	25.00	600	24	9	0	43.76	0.83
1	M-1	V	N	31	75	640	640	N/A	3.16	2.25 x 1.5
3	M-3, P-BL	V	N	15	75	640	640	N/A	15.48	0.83 x 0.83
4	C-BL	V	N	30	75	640	640	N/A	3.56	3.00 x 1.00
5	Tote Line, F-HP	V	N	27	75	640	640	N/A	3.56	3.00 x 1.00
6	M-4, M-5, M-6, Bag Lines (2), Carton Line, Drum Lines (2)	V	N	26	75	640	640	N/A	7.11	1.50 x 1.00
7	F-BL	V	N	27	75	640	640	N/A	13.58	1.00
8	DC-2	V	N	30	75	640	640	N/A	0.67	4.00 x 4.00
10	DC-1	V	N	27	75	640	640	N/A	1.6	3.33 x 2.00
11	SS-1	V	N	30	75	640	640	N/A	0.67	4.00 x 4.00
12A	SS-2	V	N	24	75	640	640	N/A	19.44	2.61
12B	SS-2	V	N	24	75	640.0	640.0	N/A	19.44	2.61
1A1	GB-1 (GB 1A-1)	V	N	26	240	5027	5027	N/A	15.69	2.67 x 2.00
1A2	GB-1 (GB 1A-2A, GB 1A-2B)	V	N	26	240	7962	7962	N/A	24.85	2.67 x 2.00
1A3	GB-1 (GB 1A-3A, GB 1A-3B, GB 1A-4, GB 1A-5)	V	N	26	240	17532	17532	N/A	54.72	2.67 x 2.00
1B1	GB-1 (GB 1B-1, GB 1B-2)	V	N	24	150	4464	4464	N/A	18.24	2.33 x 1.75
1C1	GB-1 (GB 1C-1, GB 1C-2, GB 1C-3)	V	N	24	240	23938	23938	N/A	8.16	3.00 x 2.00
2A1	GB-2 (GB 2A-1)	V	N	26	240	3950	3950	N/A	769.65	0.33
2A2	GB-2 (GB 2A-2A, GB 2A-2B)	V	N	24	240	9067	9067	N/A	28.3	2.67 x 2.00
2A3	GB-2 (GB 2A-3A, GB 2A-3B)	V	N	24	240	6228	6228	N/A	19.44	2.67 x 2.00
2B1	GB-2 (GB 2B-1, GB 2B-2, GB 2C-1, GB 2C-2, GB 2C-3)	V	N	24	160	3079	3079	N/A	10.79	3.17 x 1.50

In the table below, report the Potential to Emit for each HAP from each regulated emission unit listed in Table 2-A, only if the entire facility emits the HAP at a rate greater than or equal to one (1) ton per year. For each such emission unit, HAPs shall be reported to the nearest 0.1 tpy. Each facility-wide Individual HAP total and the facility-wide Total HAPs shall be the sum of all HAP sources calculated to the nearest 0.1 ton per year. Per 20.2.72.403.A.1 NMAC, facilities not exempt [see 20.2.72.402.C NMAC] from TAP permitting shall report each TAP that has an uncontrolled emission rate in excess of its pounds per hour screening level specified in 20.2.72.502 NMAC. TAPs shall be reported using one more significant figure than the number of significant figures shown in the pound per hour threshold corresponding to the substance. Use the HAP nomenclature as it appears in Section 112 (b) of the 1990 CAAA and the TAP nomenclature as it listed in 20.2.72.502 NMAC. Include tank-flashing emissions estimates of HAPs in this table. For each HAP or TAP listed, fill all cells in this table with the emission numbers or a "-" symbol. A "-" symbol indicates that emissions of this pollutant are not expected or the pollutant is emitted in a quantity less than the threshold amounts described above.

[illegible]

Specify fuel characteristics and usage. Unit and stack numbering must correspond throughout the application package.

[illegible]

Include appropriate tank-flashing modeling input data. Use an addendum to this table for unlisted data categories. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary. See reference Table 2-12. Note: 1.00 bbl = 42.0 gal

[illegible]

Table 2-L2: Liquid Storage Tank Data Codes Reference Table

Roof Type	Seal Type, Welded Tank Seal Type		Seal Type, Riveted Tank Seal Type		Roof, Shell Color	Paint Condition
FX: Fixed Roof	Mechanical Shoe Seal	Liquid-mounted resilient seal	Vapor-mounted resilient seal	Seal Type	WH: White	Good
IF: Internal Floating Roof	A: Primary only	A: Primary only	A: Primary only	A: Mechanical shoe, primary only	AS: Aluminum (specular)	Good
EF: External Floating Roof	B: Shoe-mounted secondary	B: Weather shield	B: Weather shield	B: Shoe-mounted secondary	AD: Aluminum (diffuse)	Poor
P: Pressure	C: Rim-mounted secondary	C: Rim-mounted secondary	C: Rim-mounted secondary	C: Rim-mounted secondary	LG: Light Gray	
					MG: Medium Gray	
					BL: Black	
					OT: Other (specify)	

Table 2-M: Materials Processed and Produced (Use additional sheets as necessary.)

Material Processed					Material Produced			
Description	Chemical Composition	Phase Liquid, or Solid	(Gas,	Quantity (specify units)	Description	Chemical Composition	Phase	Quantity (specify units)
Chilli Peppers	Carbohydrates, fats, carotenoids	Solid		17,560 tons	Chilli Powder	Mixed	Solid	7,500 tons
Vegetable Oil	Carbohydrates, fats	Liquid		700,000 gal	Chilli Pepper	Mixed	Solid	5,500 tons
Silicon Dioxide	Silicon Dioxide	Solid		465 tons	Paprika	Mixed	Solid	5,500 tons
Cumin	Proteins, carbohydrates, fats	Solid		587 tons	Red Pepper	Mixed	Solid	1,500 tons
Garlic Powder	Amino Acids	Solid		92 tons				
Oregano	Carbohydrates, fats	Solid		383 tons				
Salt	Sodium Chloride	Solid		323 tons				
Dextrose	Carbohydrates	Solid		241 tons				

Enter Continuous Emissions Measurement (CEM) Data in this table. If CEM data will be used as part of a federally enforceable permit condition, or used to satisfy the requirements of a state or federal regulation, include a copy of the CEM's manufacturer specification sheet in the Information Used to Determine Emissions attachment. Unit and stack numbering must correspond throughout the application package. Use additional sheets if necessary.

[illegible]

Table 2-P: Greenhouse Gas Emissions

☐ By checking this box, the applicant acknowledges the total CO₂e emissions are less than 75,000 tons per year.

N/A- Not Major for GHG

⁵ CO₂e means Carbon Dioxide Equivalent and is calculated by multiplying the TPV mass emissions of the green house gas by its GWP.

Section 3

Application Summary

The **Application Summary** shall include a brief description of the facility and its process, the type of permit application, the applicable regulation (i.e. 20.2.72.200.A.X, or 20.2.73 NMAC) under which the application is being submitted, and any air quality permit numbers associated with this site. If this facility is to be collocated with another facility, provide details of the other facility including permit number(s). In case of a revision or modification to a facility, provide the lowest level regulatory citation (i.e. 20.2.72.219.B.1.d NMAC) under which the revision or modification is being requested. Also describe the proposed changes from the original permit, how the proposed modification will affect the facility's operations and emissions, de-bottlenecking impacts, and changes to the facility's major/minor status (both PSD & Title V).

The **Process Summary** shall include a brief description of the facility and its processes.

Startup, Shutdown, and Maintenance (SSM) routine or predictable emissions: Provide an overview of how SSM emissions are accounted for in this application. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions.

OLAM West Coast, Inc. (OLAM) is submitting this application for a significant revision of its Olam Spices and Vegetables Ingredients facility. The facility is currently operating under NSR Air Permit 1744M3R2, issued on 08/08/2011. The requested modification described below is consistent with 20.2.72.219.D.(1) NMAC of the New Mexico Administrative Code (NMAC). This significant revision is subject to air dispersion modeling.

Proposed Changes from the Original Permit

OLAM is submitting this application for the following changes from NSR Air Permit 1744M3R2:

- Authorization to install a new boiler BB-6 (2.0 MMBTU/h);
- The replacement of boiler BB-1 (8.4 MMBTU/h) with a 6.1 MMBTU/h unit;
- The replacement of boiler BB-4 (6.4 MMBTU/h) with a 2.0 MMBTU/h unit;
- The replacement of finish mill M-7 and steam sterilizer SS-2;
- The removal of cryo mill M-8 and the four seed dryers SD1-4 (2.0 MMBTU/h); and
- The removal of boilers BB-2 (8.4 MMBTU/h), BB-3 (4.2 MMBTU/h), and BB-5 (8.4 MMBTU/h).

Process Summary

The OLAM facility has three main processes to manufacture spice and vegetable bulk materials. The processes are:

1. The Proctor Mill
2. The Other Producers (OP) Units
3. The Blending, Cooking, and Packaging Units

1. The Proctor Mill

The Proctor Mill receives chile, spices, and vegetables (raw spices) at a rate of 7500 lb/h. The raw spices are stripped of wet all trash, stems, and seeds by the Wet End Unit. The process divides the spices into two streams that enter Proctor 1 and Proctor 2 for indirect heat drying. Proctor 1 and Proctor 2 receive heat from the GB-1 and GB-2 natural gas heaters. The spices exiting the Proctors enter the Proctor Mill #1 (M-1) for comminution. Cyclone PR-01 and Baghouse #1 control any particulate matter generated by Proctor Mill 1. The Proctor Blender (P-BL) receives the milled spices from the Proctor Mill for proper classification. Cyclone PR-02 and Baghouse #3 (P-BL) control any particulate matter generated by the Proctor Blender. The milled and mixed spices leave the Proctor Unit by pneumatic conveyance for storage at the Work in Progress (WIP) Warehouse.

2. The Other Producers (OP) Units

OLAM receives raw spices from regional and national producers for processing at its Las Cruces plant. The OP Units consist of: The OP Mill #3. OP Mill #3 receives raw spices at a rate of 7500 lb/h for comminution. Cyclones OP-02, OP-03, and OP-04 move the milled spices within OP Mill 3 to control the spice sieve size and control any particulate matter generated by the mill with the help of Baghouse #3 (M-3). The milled and well-mixed spices leave the OP Mill #3 by pneumatic conveyance for storage at the Work in Progress (WIP) Warehouse.

3. The Blending, Cooking, and Packaging Units

The Blending, Cooking, and Packaging Unit is the most complicated of the processes at OLAM. The OLAM plant produces a high number variety of final product spices by the blending of individual spices stored in the Work-in-Progress (WIP) warehouse. OLAM SVI keeps the composition and percentage of spices in the different final products as confidential and proprietary information.

a. Cooking Blenders No.1 to No.3

OLAM sends 24000 lb/h of a combination of spices to the Cooking Blenders No. 1 to No.3 (C-BL). The Cooking Blenders use Cyclones CB-01 to CB-04 for classification, mixing, and greater consistency in cooking of the spices. The cyclones also capture any particulate matter generated by the blender for control of dust with the assistance of Baghouse #4 (Stack C-BL).

b. Cooking Blender Hoppers No. 1 to No. 3

The Cooking Blenders transfer 24,000 lb/h of spices to the Finish Mills No. 4 to No. 5 through the Cooking Blender Hoppers No. 1 to No. 3. Cyclones CB-12 to CB-14 separate the conveyance air from the spices as they enter the hoppers, as well as control any dust with the support of Baghouse #5 (F-HP). The hoppers transfer the spices to Finish Mills No. 4 to No. 6 for final classification. The Regulated Source List names the Finishing Mills as M-4, M-5, and M-6. The Finishing Blenders No. 1 to No. 3 (F-BL) receive the classified spices from the Finish Mills for final blending and texturizing. Cyclones CB-09 to CB-11 support the classification of the spices and also capture any dust or particulate matter with the assistance of Baghouse #7 (FBL).

The finished spices are passed to the Packaging/Bagging area to prepare them for delivery to the OLAM customers. The bagging units are:

- Bag Line No.1 and No. 2
- Drum Line No. 1 and No.2
- Carton Line
- Tote Line

Each of these listed units above has a capacity of 4000 lb/h. However, the combined capacity of packaging is limited to 24,000 lb/h, the delivery capacity of the Finishing Blenders (F-BL).

The Tote Line receives up to 4000 lb/h of spices from the Cooking Blenders through Cyclone CR-05 and Baghouse #8. Baghouse #5 controls particulate matter from the Tote Line packaging.

The bag and drum lines receive spices through hoppers. Baghouse #6 controls the drop point emissions from the drum and bag lines. The Regulated Source List names the Baghouse #6 control by the name of the unit:

- Baghouse #6 to Drum Line 1
- Baghouse #6 to Drum Line 2
- Baghouse #6 to Drum Line 1
- Baghouse #6 to Drum Line 2
- Baghouse #6 to Carton Line

Startup, Shutdown, and Maintenance (SSM)

The OLAM SVI plant uses clean burning, commercial pipeline natural gas as fuel for its boilers and heaters. The fuel burns clean and will not produce smoke like other denser fuels such as diesel or fuel oil even as the temperature of the burners transitions into a steady state.

Start-Up Procedure

During start-up of the dryer units, the process sequence is as follows:

1. The control system turns the blowers for the cyclones and baghouses.
2. The unit starts accepting spices into the dryers or cooking units in recirculation mode. The dryers and cooking units require the presence of spices to serve as a thermal load. The absence of a thermal load in the dryers and cookers can cause incoming spices to burn and char causing an unusable product.
3. The process applies thermal energy from either heaters or steam.

Shut Down Procedure

During a shut-down of the dryer units, the sequence is as follows:

1. The process removes the application of thermal energy by the shutdown of natural gas flow to the heaters or boilers.
2. The unit stops delivery of the product and begins internal recirculation to allow the spices to cool down.
3. Alternative step: The process removes the spices from the unit as it begins to remove the thermal energy.
4. The control process will stop the cyclone and baghouse blowers once the mill and blender units are empty of spices to complete the shutdown.

Calculations of SSM Emissions

The emissions from the startup or shutdown of natural gas fueled system is minimal and is lower than that of the heaters and burners operating at a steady state.

Section 4

Process Flow Sheet

A **process flow sheet** and/or block diagram indicating the individual equipment, all emission points and types of control applied to those points. The unit numbering system should be consistent throughout this application.

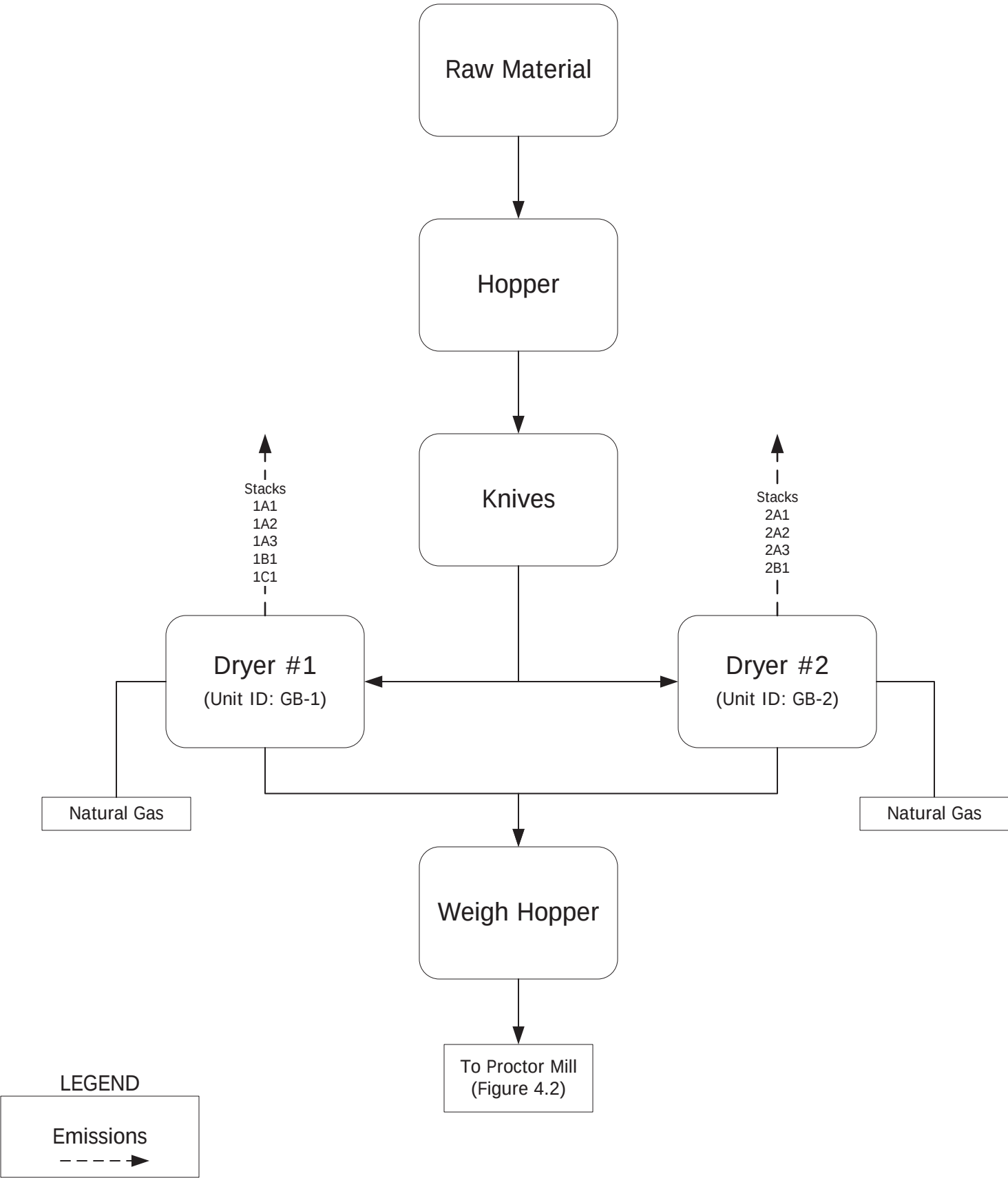
A simplified process flow block diagram of the OLAM process is attached as follows:

1. Dehydration and seed line;
2. Proctor Mill line;
3. Flake Room Line;
4. Steam Screw Room and OP Mill Line;
5. Cooking/Blending Line;
6. Packaging Line; and
7. Steam sterilizer Line

OLAM Spices and Vegetable Ingredients

OLAM West Coast Inc.

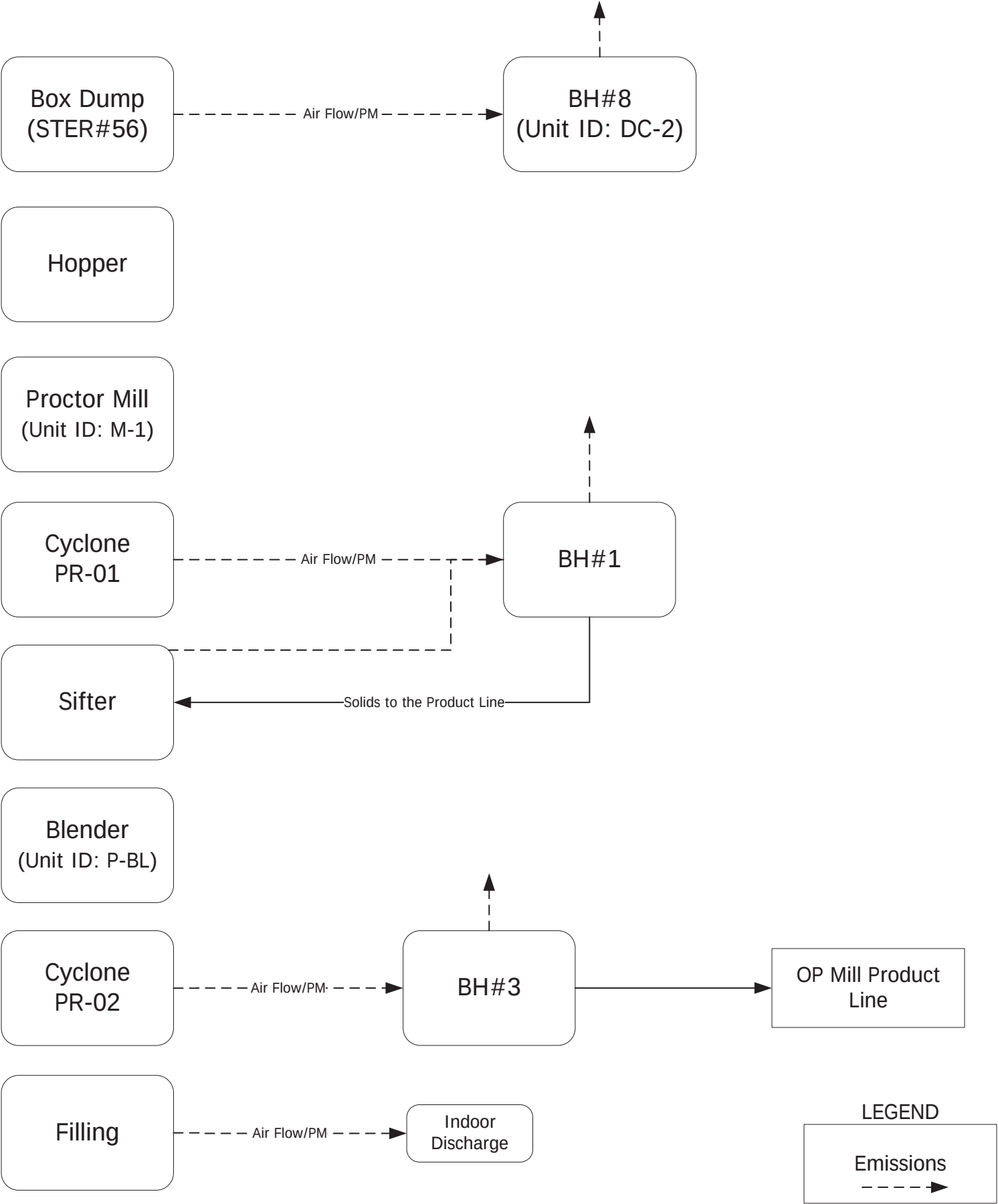
Figure 4.1: Dehydration Line Process Flow Diagram



OLAM Spices and Vegetable Ingredients

OLAM West Coast Inc.

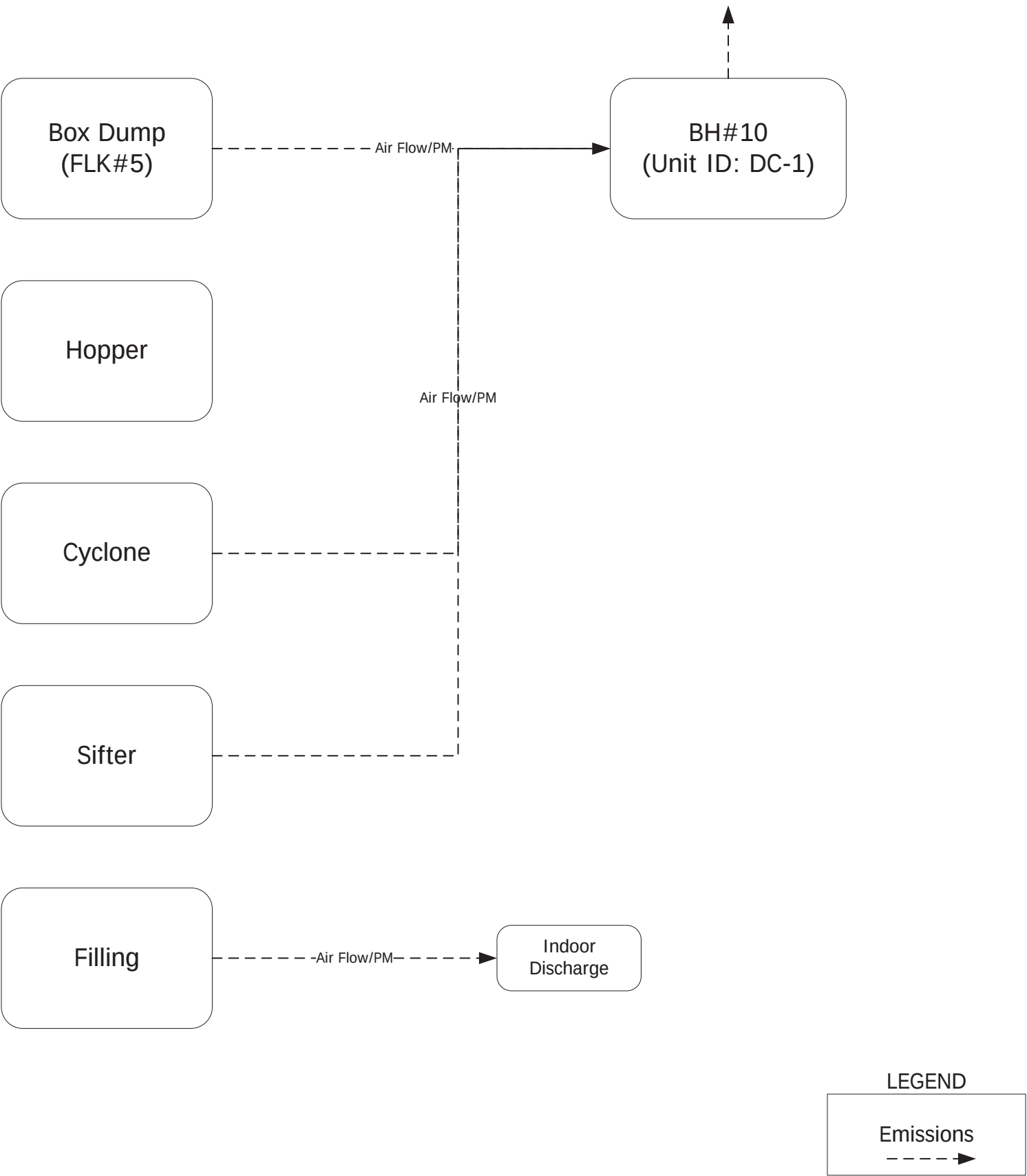
Figure 4.2: Proctor Mill Line Process Flow Diagram



OLAM Spices and Vegetable Ingredients

OLAM West Coast Inc.

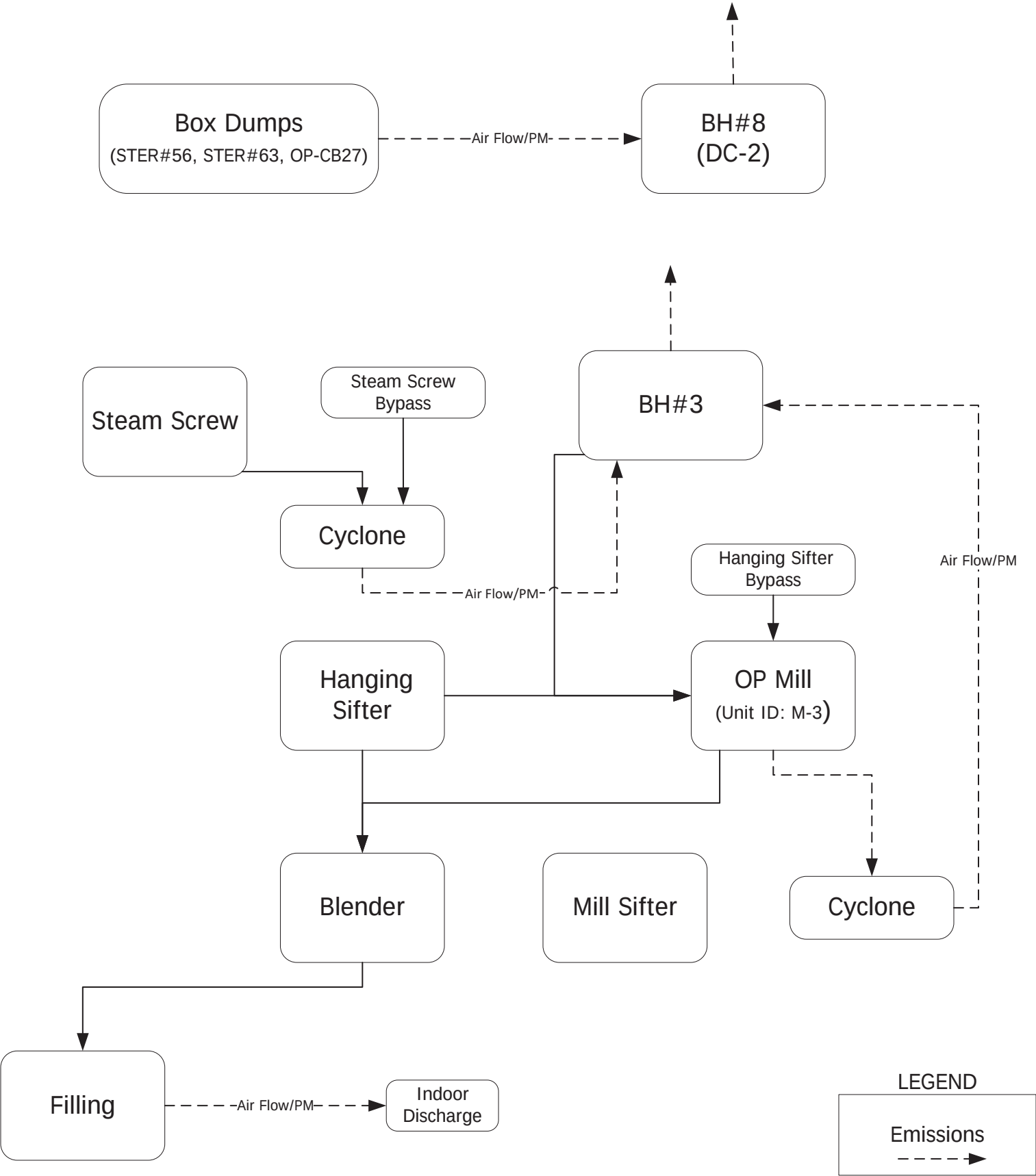
Figure 4.3: Flake Room Line Process Flow Diagram



OLAM Spices and Vegetable Ingredients

OLAM West Coast Inc.

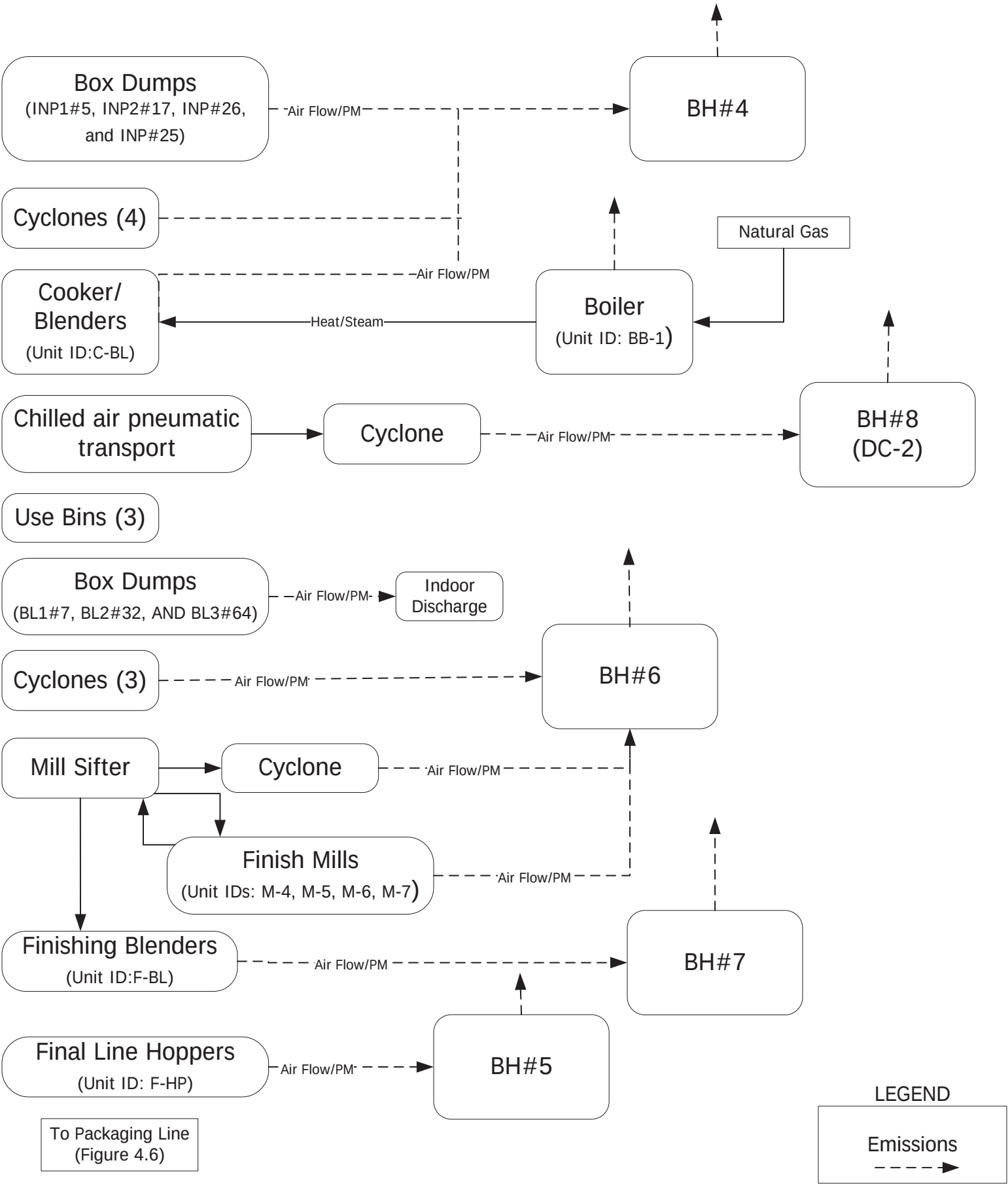
Figure 4.4: Steam Screw Room & OP Mill Line Process Flow Diagram



OLAM Spices and Vegetable Ingredients

OLAM West Coast Inc.

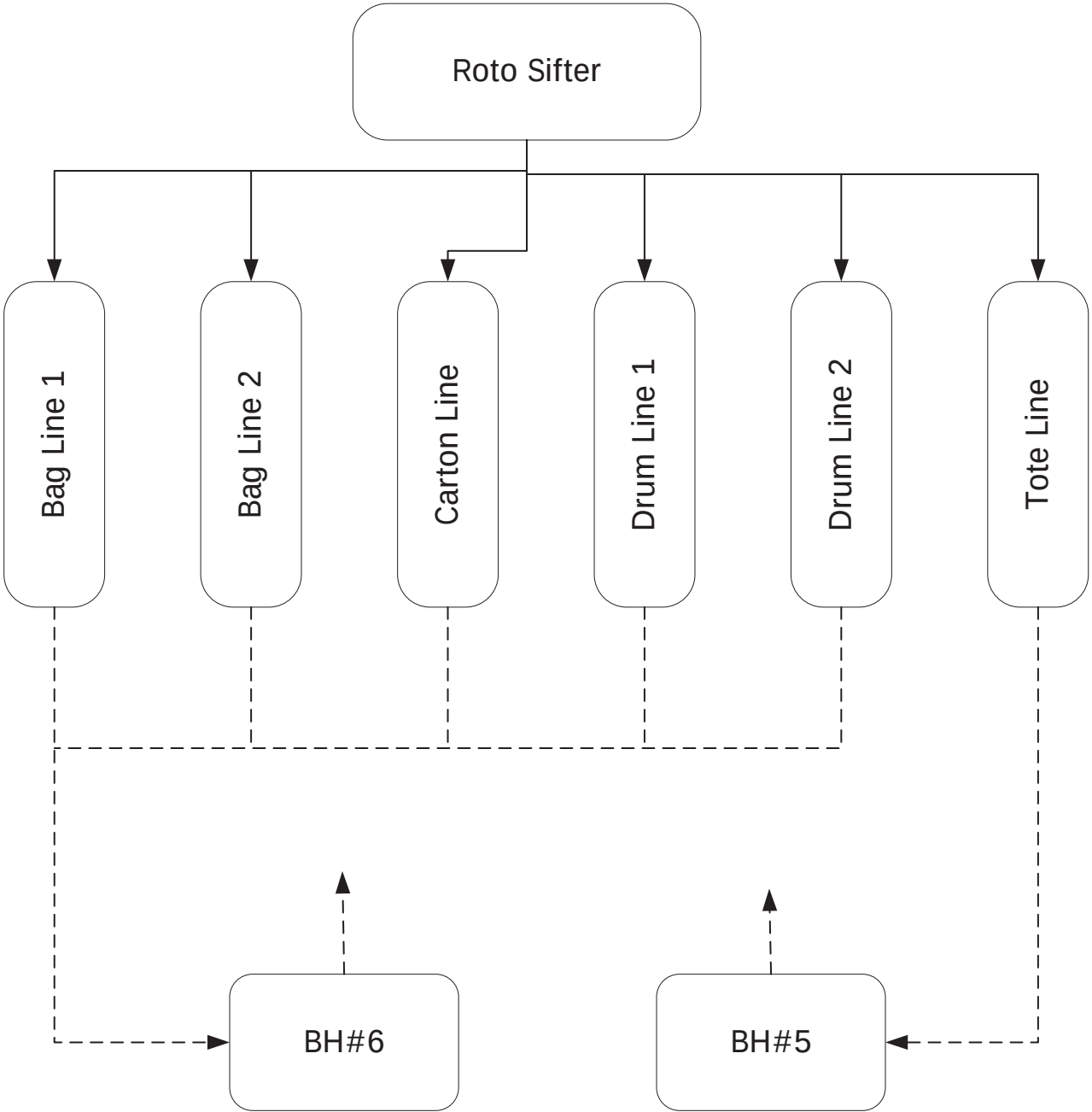
Figure 4.5: Cooking/Blending Line Process Flow Diagram



OLAM Spices and Vegetable Ingredients

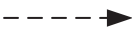
OLAM West Coast Inc.

Figure 4.6: Packaging Line Process Flow Diagram



LEGEND

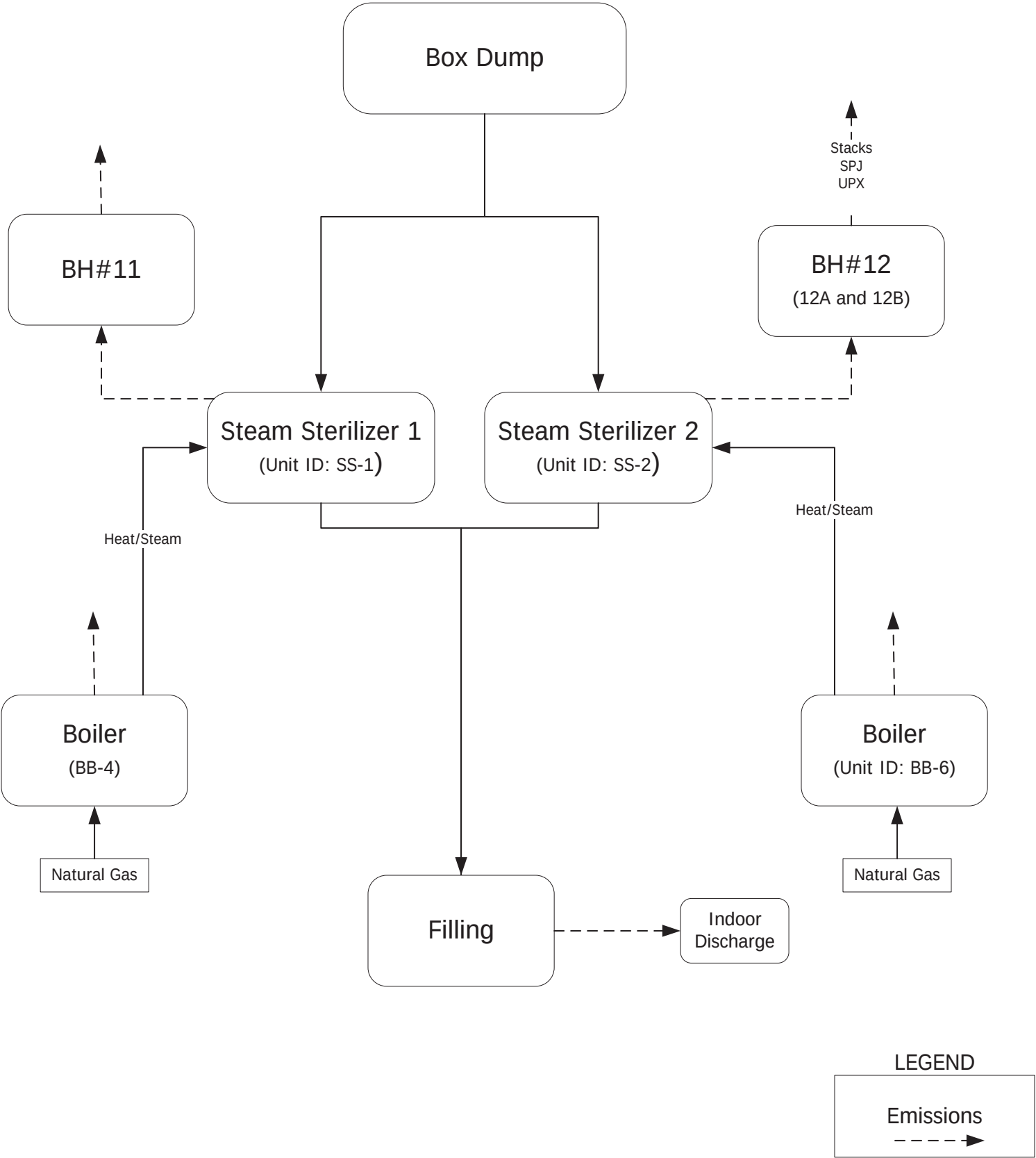
Emissions



OLAM Spices and Vegetable Ingredients

OLAM West Coast Inc.

Figure 4.7: Steam Sterilizer Line Process Flow Diagram



Section 5

Plot Plan Drawn To Scale

A **plot plan drawn to scale** showing emissions points, roads, structures, tanks, and fences of property owned, leased, or under direct control of the applicant. This plot plan must clearly designate the restricted area as defined in UA1, Section 1-D.12. The unit numbering system should be consistent throughout this application.

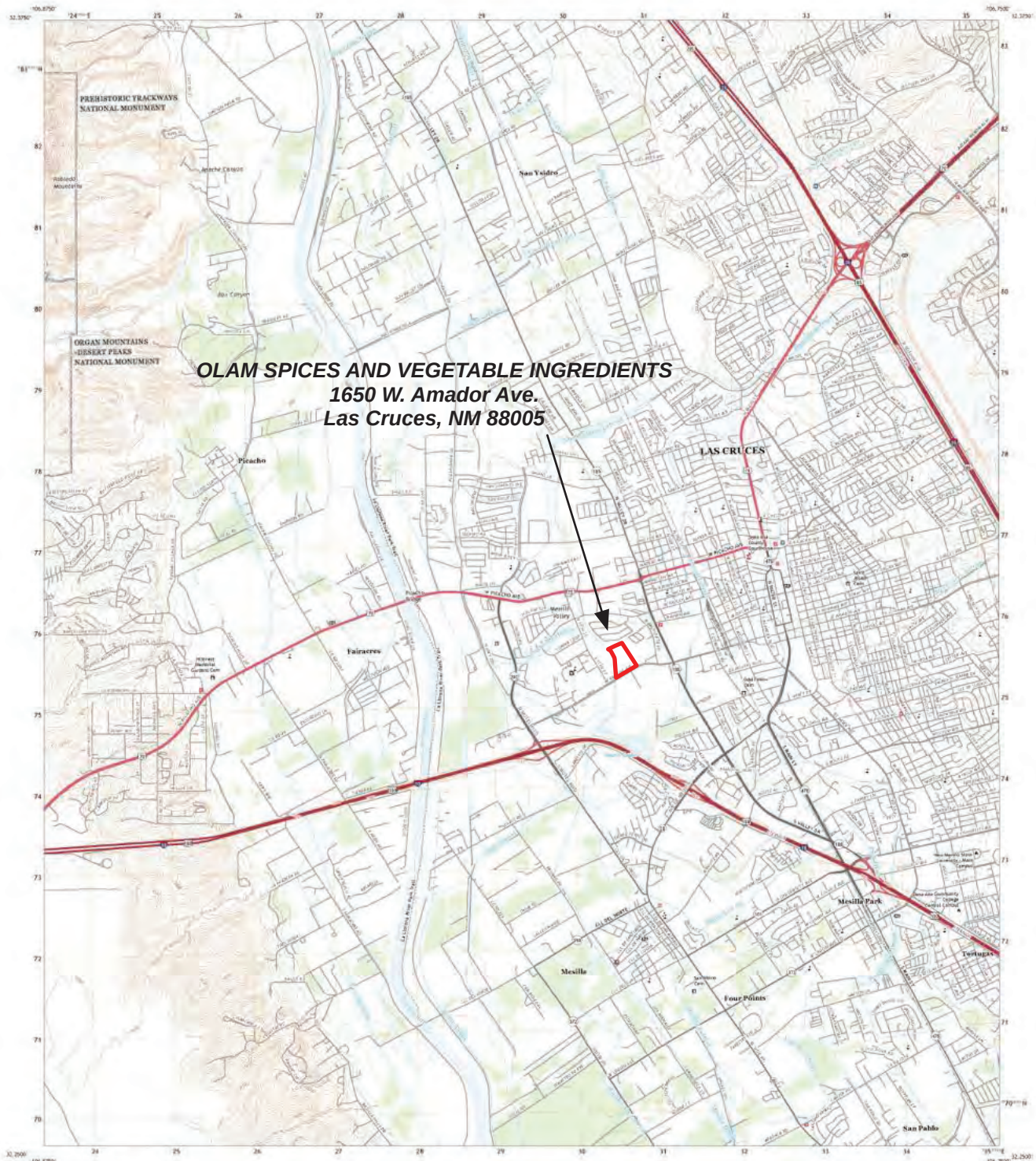
The plot plan of the OLAM facility is attached as follows:



U.S. DEPARTMENT OF THE INTERIOR
U.S. GEOLOGICAL SURVEY



LAS CRUCES QUADRANGLE
NEW MEXICO: DONA ANA COUNTY
7.5-MINUTE SERIES



OLAM SPICES AND VEGETABLE INGREDIENTS
1650 W. Amador Ave.
Las Cruces, NM 88005

Produced by the United States Geological Survey

North American Datum of 1983 (NAD83)
Vertical Datum: Mean of 1984-1985, based on a
1988 datum adjustment. Transverse Mercator, Zone 13S
The map is not a legal document. Boundaries and the
information on this map are for general informational
purposes only and do not constitute a warranty or
guarantee of accuracy. Users are advised to verify
information before using it for any purpose.

Map Date: May 2016
Scale: 1:24,000
Projection: UTM
Datum: NAD83
Units: Meters
Elevation: 1000 to 2000 feet
Contour Interval: 10 feet
Map Scale: 1 inch = 1968 feet
Map Date: May 2016
Scale: 1:24,000
Projection: UTM
Datum: NAD83
Units: Meters
Elevation: 1000 to 2000 feet
Contour Interval: 10 feet
Map Scale: 1 inch = 1968 feet



CONTOUR INTERVAL: 10 FEET
VERTICAL DATUM: MEAN OF 1984-1985
This map was produced in compliance with the
National Geospatial Program (50 USC 2881, 2882)
and is available for use by the public in the public domain.



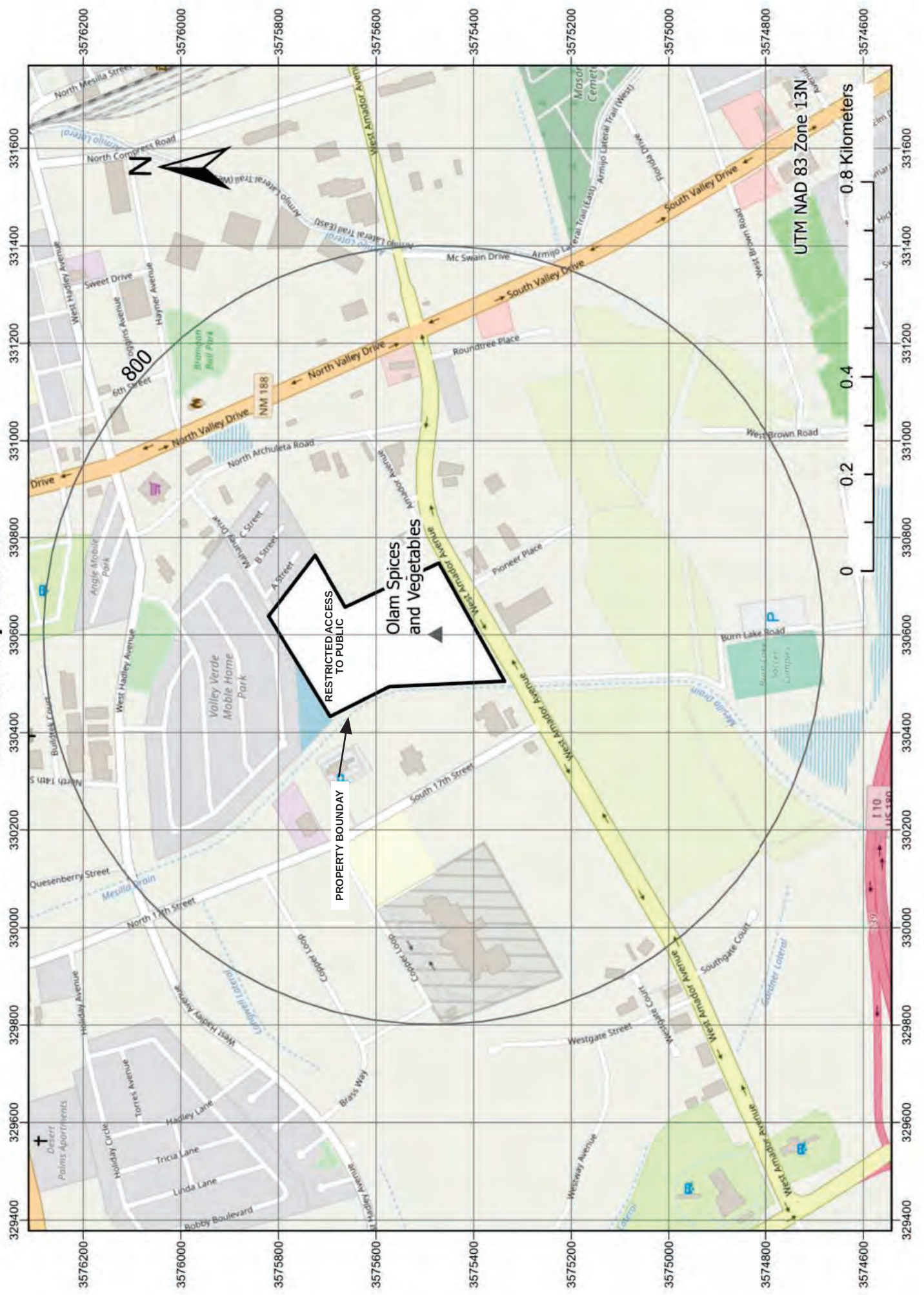
ROAD CLASSIFICATION

Expressway	Local Connector
Secondary Road	Local Road
Artery	Other
Interstate Route	US Route
	State Route

LAS CRUCES, NM
2020



OLAM Facility Location



Section 6

All Calculations

Show all calculations used to determine both the hourly and annual controlled and uncontrolled emission rates. All calculations shall be performed keeping a minimum of three significant figures. Document the source of each emission factor used (if an emission rate is carried forward and not revised, then a statement to that effect is required). If identical units are being permitted and will be subject to the same operating conditions, submit calculations for only one unit and a note specifying what other units to which the calculations apply. All formulas and calculations used to calculate emissions must be submitted. The "Calculations" tab in the UA2 has been provided to allow calculations to be linked to the emissions tables. Add additional "Calc" tabs as needed. If the UA2 or other spread sheets are used, all calculation spread sheet(s) shall be submitted electronically in Microsoft Excel compatible format so that formulas and input values can be checked. Format all spread sheets and calculations such that the reviewer can follow the logic and verify the input values. Define all variables. If calculation spread sheets are not used, provide the original formulas with defined variables. Additionally, provide subsequent formulas showing the input values for each variable in the formula. All calculations, including those calculations are imbedded in the Calc tab of the UA2 portion of the application, the printed Calc tab(s), should be submitted under this section.

Tank Flashing Calculations: The information provided to the AQB shall include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., NOI, permit, or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis. If Hysis is used, all relevant input parameters shall be reported, including separator pressure, gas throughput, and all other relevant parameters necessary for flashing calculation.

SSM Calculations: It is the applicant's responsibility to provide an estimate of SSM emissions or to provide justification for not doing so. In this Section, provide emissions calculations for Startup, Shutdown, and Routine Maintenance (SSM) emissions listed in the Section 2 SSM and/or Section 22 GHG Tables and the rational for why the others are reported as zero (or left blank in the SSM/GHG Tables). Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on calculating SSM emissions. If SSM emissions are greater than those reported in the Section 2, Requested Allowables Table, modeling may be required to ensure compliance with the standards whether the application is NSR or Title V. Refer to the Modeling Section of this application for more guidance on modeling requirements.

Glycol Dehydrator Calculations: The information provided to the AQB shall include the manufacturer's maximum design recirculation rate for the glycol pump. If GRI-Glycalc is used, the full input summary report shall be included as well as a copy of the gas analysis that was used.

Road Calculations: Calculate fugitive particulate emissions and enter haul road fugitives in Tables 2-A, 2-D and 2-E for:

1. If you transport raw material, process material and/or product into or out of or within the facility and have PER emissions greater than 0.5 tpy.
2. If you transport raw material, process material and/or product into or out of the facility more frequently than one round trip per day.

Significant Figures:

A. All emissions standards are deemed to have at least two significant figures, but not more than three significant figures.

B. At least 5 significant figures shall be retained in all intermediate calculations.

C. In calculating emissions to determine compliance with an emission standard, the following rounding off procedures shall be used:

- (1) If the first digit to be discarded is less than the number 5, the last digit retained shall not be changed;
- (2) If the first digit discarded is greater than the number 5, or if it is the number 5 followed by at least one digit other than the number zero, the last figure retained shall be increased by one unit; **and**
- (3) If the first digit discarded is exactly the number 5, followed only by zeros, the last digit retained shall be rounded upward if it is an odd number, but no adjustment shall be made if it is an even number.
- (4) The final result of the calculation shall be expressed in the units of the standard.

Control Devices: In accordance with 20.2.72.203.A(3) and (8) NMAC, 20.2.70.300.D(5)(b) and (e) NMAC, and 20.2.73.200.B(7) NMAC, the permittee shall report all control devices and list each pollutant controlled by the control device

regardless if the applicant takes credit for the reduction in emissions. The applicant can indicate in this section of the application if they chose to not take credit for the reduction in emission rates. For notices of intent submitted under 20.2.73 NMAC, only uncontrolled emission rates can be considered to determine applicability unless the state or federal Acts require the control. This information is necessary to determine if federally enforceable conditions are necessary for the control device, and/or if the control device produces its own regulated pollutants or increases emission rates of other pollutants.

The calculation of the OLAM significant revision is attached as follows:

Section 6.a

Green House Gas Emissions

(Submitting under 20.2.70, 20.2.72 20.2.74 NMAC)

Title V (20.2.70 NMAC), Minor NSR (20.2.72 NMAC), and PSD (20.2.74 NMAC) applicants must estimate and report greenhouse gas (GHG) emissions to verify the emission rates reported in the public notice, determine applicability to 40 CFR 60 Subparts, and to evaluate Prevention of Significant Deterioration (PSD) applicability. GHG emissions that are subject to air permit regulations consist of the sum of an aggregate group of these six greenhouse gases: carbon dioxide (CO₂), nitrous oxide (N₂O), methane (CH₄), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆).

Calculating GHG Emissions:

1. Calculate the ton per year (tpy) GHG mass emissions and GHG CO₂e emissions from your facility.
2. GHG mass emissions are the sum of the total annual tons of greenhouse gases without adjusting with the global warming potentials (GWPs). GHG CO₂e emissions are the sum of the mass emissions of each individual GHG multiplied by its GWP found in Table A-1 in 40 CFR 98 Mandatory Greenhouse Gas Reporting.
3. Emissions from routine or predictable start up, shut down, and maintenance must be included.
4. Report GHG mass and GHG CO₂e emissions in Table 2-P of this application. Emissions are reported in **short** tons per year and represent each emission unit's Potential to Emit (PTE).
5. All Title V major sources, PSD major sources, and all power plants, whether major or not, must calculate and report GHG mass and CO₂e emissions for each unit in Table 2-P.
6. For minor source facilities that are not power plants, are not Title V, and are not PSD there are three options for reporting GHGs in Table 2-P: 1) report GHGs for each individual piece of equipment; 2) report all GHGs from a group of unit types, for example report all combustion source GHGs as a single unit and all venting GHGs as a second separate unit; 3) or check the following ☐ By checking this box, the applicant acknowledges the total CO₂e emissions are less than 75,000 tons per year.

Sources for Calculating GHG Emissions:

- Manufacturer's Data
- AP-42 Compilation of Air Pollutant Emission Factors at <http://www.epa.gov/ttn/chief/ap42/index.html>
- EPA's Internet emission factor database WebFIRE at <http://cfpub.epa.gov/webfire/>
- 40 CFR 98 Mandatory Green House Gas Reporting except that tons should be reported in short tons rather than in metric tons for the purpose of PSD applicability.
- API Compendium of Greenhouse Gas Emissions Methodologies for the Oil and Natural Gas Industry. August 2009 or most recent version.
- Sources listed on EPA's NSR Resources for Estimating GHG Emissions at <http://www.epa.gov/nsr/clean-air-act-permitting-greenhouse-gases>:

Global Warming Potentials (GWP):

Applicants must use the Global Warming Potentials codified in Table A-1 of the most recent version of 40 CFR 98 Mandatory Greenhouse Gas Reporting. The GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to that of one unit mass of CO₂ over a specified time period.

"Greenhouse gas" for the purpose of air permit regulations is defined as the aggregate group of the following six gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. **(20.2.70.7 NMAC, 20.2.74.7 NMAC)**. You may also find GHGs defined in 40 CFR 86.1818-12(a).

Metric to Short Ton Conversion:

Short tons for GHGs and other regulated pollutants are the standard unit of measure for PSD and title V permitting programs. 40 CFR 98 Mandatory Greenhouse Reporting requires metric tons.

1 metric ton = 1.10231 short tons (per Table A-2 to Subpart A of Part 98 – Units of Measure Conversions)

Emissions Summary

Unit	NO _x		CO		VOC		SO _x		Uncontrolled Emissions				H ₂ S lb/hr tpy	Total HAP lb/hr tpy	
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	PM	PM ₁₀	PM _{2.5}				
BB-1	0.60	2.63	0.50	2.21	0.033	0.14	0.034	0.15	0.046	0.20	0.046	0.20	-	0.011	0.049
BB-4	0.20	0.86	0.16	0.72	0.011	0.047	0.011	0.049	0.015	0.065	0.015	0.065	-	3.69E-03	0.016
BB-6	0.20	0.86	0.16	0.72	0.011	0.047	0.011	0.049	0.015	0.065	0.015	0.065	-	3.69E-03	0.016
BagLine-1	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	-	-	-
BagLine-2	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	-	-	-
C-BL	-	-	-	-	-	-	-	-	151.20	662.26	68.04	298.02	-	17.01	74.50
Carton Line	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	-	4.05E-03	0.018
DC-1	-	-	-	-	-	-	-	-	2.21	9.66	0.99	4.35	-	0.25	1.09
DC-2	-	-	-	-	-	-	-	-	64.80	283.82	29.16	127.72	-	7.29	31.93
DrumLine-1	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	-	4.05E-03	0.018
DrumLine-2	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	-	4.05E-03	0.018
F-BL	-	-	-	-	-	-	-	-	64.80	283.82	29.16	127.72	-	7.29	31.93
F-HP	-	-	-	-	-	-	-	-	64.80	283.82	29.16	127.72	-	7.29	31.93
GB-1	2.90	12.71	2.44	10.68	0.16	0.70	0.17	0.73	0.22	0.97	0.22	0.97	-	0.055	0.24
GB-2	2.41	10.56	2.03	8.87	0.13	0.58	0.14	0.60	0.18	0.80	0.18	0.80	-	0.045	0.20
M-1	-	-	-	-	-	-	-	-	20.25	88.70	9.11	39.91	-	2.28	9.98
M-3	-	-	-	-	-	-	-	-	40.50	177.39	18.23	79.83	-	4.56	19.96
M-4	-	-	-	-	-	-	-	-	21.60	94.61	9.72	42.57	-	2.43	10.64
M-5	-	-	-	-	-	-	-	-	21.60	94.61	9.72	42.57	-	2.43	10.64
M-6	-	-	-	-	-	-	-	-	21.60	94.61	9.72	42.57	-	2.43	10.64
M-7	-	-	-	-	-	-	-	-	43.20	94.63	19.44	43.02	-	4.86	10.89
P-BL	-	-	-	-	-	-	-	-	20.25	88.70	9.11	39.91	-	2.28	9.98
SS-1	-	-	-	-	-	-	-	-	432.00	1892.16	194.40	851.47	-	212.87	851.47
SS-2	-	-	-	-	-	-	-	-	108.00	473.04	48.60	212.87	-	12.15	53.22
Total Line	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	-	4.05E-03	0.018
Total	6.31	27.62	5.30	23.20	0.35	1.52	0.36	1.58	1077.50	4624.86	485.14	2082.78	-	121.64	522.41
													-	0.12	0.52

Controlled Emissions																					
Unit	NO _x		CO		VOC		SO _x		PM		PM ₁₀		PM _{2.5}		H ₂ S	Total HAP	Formaldehyde	Hexane			
	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy	lb/hr	tpy			
BB-1	0.60	2.63	0.50	2.21	0.033	0.14	0.034	0.15	0.046	0.20	0.046	0.20	0.046	0.20	-	0.011	0.049	4.50E-04	0.011	0.047	
BB-4	0.20	0.86	0.16	0.72	0.011	0.047	0.011	0.049	0.015	0.065	0.015	0.065	0.015	0.065	-	3.69E-03	0.016	1.47E-04	0.011	0.015	
BB-6	0.20	0.86	0.16	0.72	0.011	0.047	0.011	0.049	0.015	0.065	0.015	0.065	0.015	0.065	-	3.69E-03	0.016	1.47E-04	0.011	0.015	
BagLine-1	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	4.05E-03	0.018	-	-	-	-	-	-	
BagLine-2	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	4.05E-03	0.018	-	-	-	-	-	-	
C-BL	-	-	-	-	-	-	-	-	0.151	0.66	0.068	0.30	0.017	0.075	-	-	-	-	-	-	
Carton Line	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	4.05E-03	0.018	-	-	-	-	-	-	
DC-1	-	-	-	-	-	-	-	-	2.21E-03	9.66E-03	9.92E-04	4.35E-03	2.48E-04	1.09E-03	-	-	-	-	-	-	
DC-2	-	-	-	-	-	-	-	-	0.065	0.28	0.029	0.13	7.29E-03	0.032	-	-	-	-	-	-	
DrumLine-1	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	4.05E-03	0.018	-	-	-	-	-	-	
DrumLine-2	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	4.05E-03	0.018	-	-	-	-	-	-	
F-BL	-	-	-	-	-	-	-	-	0.065	0.28	0.029	0.13	7.29E-03	0.032	-	-	-	-	-	-	
F-HP	-	-	-	-	-	-	-	-	0.065	0.28	0.029	0.13	7.29E-03	0.032	-	-	-	-	-	-	
GB-1	2.90	12.71	2.44	10.68	0.16	0.70	0.17	0.73	0.22	0.97	0.22	0.97	0.22	0.97	-	0.055	0.24	2.18E-03	0.052	0.23	
GB-2	2.41	10.56	2.03	8.87	0.13	0.58	0.14	0.60	0.18	0.80	0.18	0.80	0.18	0.80	-	0.045	0.20	1.81E-03	0.043	0.19	
M-1	-	-	-	-	-	-	-	-	0.020	0.089	9.11E-03	0.040	2.28E-03	9.98E-03	-	-	-	-	-	-	
M-3	-	-	-	-	-	-	-	-	0.041	0.18	0.018	0.080	4.56E-03	0.020	-	-	-	-	-	-	
M-4	-	-	-	-	-	-	-	-	0.022	0.095	9.72E-03	0.043	2.43E-03	0.011	-	-	-	-	-	-	
M-5	-	-	-	-	-	-	-	-	0.022	0.095	9.72E-03	0.043	2.43E-03	0.011	-	-	-	-	-	-	
M-6	-	-	-	-	-	-	-	-	0.022	0.095	9.72E-03	0.043	2.43E-03	0.011	-	-	-	-	-	-	
M-7	-	-	-	-	-	-	-	-	0.043	0.173	0.019	0.078	4.86E-03	0.019	-	-	-	-	-	-	
P-BL	-	-	-	-	-	-	-	-	0.020	0.089	9.11E-03	0.040	2.28E-03	9.98E-03	-	-	-	-	-	-	
SS-1	-	-	-	-	-	-	-	-	0.13	0.55	0.057	0.25	0.014	0.062	-	-	-	-	-	-	
SS-2	-	-	-	-	-	-	-	-	0.032	0.14	0.014	0.062	3.54E-03	0.016	-	-	-	-	-	-	
Total Line	-	-	-	-	-	-	-	-	0.036	0.16	0.016	0.071	4.05E-03	0.018	-	-	-	-	-	-	
Total	6.31	27.62	5.30	23.20	0.35	1.52	0.36	1.58	1.39	6.07	0.89	3.89	0.58	2.55	-	0.12	0.52	4.73E-03	0.02	0.11	0.50

Emission Inputs Table

Site-Wide		
Description	Value	Unit
Annual Operating Hours	8,760	hr
Daily Operating Hours	24	hr
Permit No:	Air Quality Permit No. 1744-M3-R2	
Location:	32.302944, -106.798306	
Site Elevation	3,890	ft MSL
Fuel Heat Value	1,020.00	Btu/scf
Fuel Sulfuer Content	2.0	gr S/100scf

Heater Information		
Description	Value	Unit
Unit:	BB-1	
Quantity:	1	
Decription:	CBI-200 150-150 Boiler	
Heat Input:	6.124	MMBtu/hr
Stack Height:	24.00	ft
Stack Diameter:	1.33	ft
Unit:	BB-4	
Quantity:	1	
Decription:	CFH-700-50-150ST Boiler	
Heat Input:	2	MMBtu/hr
Stack Height:	20.00	ft
Stack Diameter:	0.83	ft
Unit:	BB-6	
Quantity:	1	
Decription:	CFH-700-50-150ST Boiler	
Heat Input:	2	MMBtu/hr
Stack Height:	25.00	ft
Stack Diameter:	0.83	ft
Unit:	GB-1	
Quantity:	1	
Decription:	Packaged Dryer	
Heat Input:	29.6	MMBtu/hr
Stack Height:	Varies	ft
Stack Diameter:	Varies	ft
Unit:	GB-2	
Quantity:	1	
Decription:	Packaged Dryer	
Heat Input:	24.6	MMBtu/hr
Stack Height:	Varies	ft
Stack Diameter:	Varies	ft

Milling Information		
Description	Value	Unit
Unit:	M-1	
Quantity:	1	
Decription:	Prater MM-36 Proctor Mill	
Capacity:	7500	lb/hr
Unit:	M-3	
Quantity:	1	
Decription:	Prater MM-36 OP Mill	
Capacity:	7500	lb/hr
Unit:	M-4, M-5, and M-6	
Quantity:	3	
Decription:	Bauermeister UT Finish Mill	
Capacity:	8000	lb/hr
Unit:	M-7	
Quantity:	1	
Decription:	Baurmeister UT33 Finish Mill	
Capacity:	8000	lb/hr

Heater Input Information			
Unit(s):	BB-1		
Description:	6.1 MMBtu/hr Boiler CBI-200 150-150		
Heat input:	6.1 MMBtu/hr	Estimated heat input	
Fuel heat value:	1,020 Btu/scf		
Fuel sulfur content:	2.0 gr S/100scf	Estimated for field gas	
Operating hours:	8,760 hours/year		
Fuel Usage:	6,004 scf/hr		
	52.59 MMscf/yr		

Criteria Pollutant Emission Rates per Unit						
	NO _x	CO	VOC	SO ₂ ¹	PM ²	Units
Emission Factors	100	84	5.5	-	7.6	lb/MMscf
	100.0	84.0	5.5	-	7.6	lb/MMscf
Emissions	0.60	0.50	0.033	0.034	0.046	lb/hr ³
	2.63	2.21	0.145	0.150	0.200	tons/year ⁴

HAP Emission Rates per Unit							
	Hexane	Benzene	Toluene	HCHO	Total HAPs ⁵	Units	Notes
Emission Factors	1.8	2.10E-03	3.40E-03	0.075	-	lb/MMscf	AP-42 Table 1.4-3
	1.8	2.10E-03	3.40E-03	7.50E-02	-	lb/MMscf	Adjusted EF, per footnote a in Table 1.4-3
Emissions	0.0108	1.26E-05	2.04E-05	4.50E-04	0.011	lb/hr ³	
	0.047	5.52E-05	8.94E-05	1.97E-03	0.049	tons/year ⁴	

GHG Calculations				
	CO ₂ ⁶	N ₂ O ⁶	CH ₄ ⁶	CO ₂ e ⁶
	53.06	0.0001	0.001	kg/MMBtu
	1	298	25	GWP
	3137.69	0.0059	0.059	tpy
	3137.69	1.76	1.48	tpy CO2e

¹ SO₂ emissions based on fuel sulfur content of 2 gr S/100 scf or 0.00286 lb S/MMscf

0.00286 lb S/MMscf*fuel consumption (Mscf/hr)*64 lb SO₂/32 lb S = lb SO₂/hr

² Assumes PM₁₀ = PM_{2.5}

³ lb/hr emissions calculated using the following methods:

Criteria and HAPs lb/hr = EF (lb/MMscf) * Rating (MMBtu/hr) / Heat value (Btu/scf)

⁴ For all non-HAP calculations, tons/year = lb/hr * Operating hours * 1ton/2000lb

⁵ Total HAP emissions are the sum of all individual HAPs calculated.

⁶ N₂O, CH₄, and CO₂ tpy Emission Rate = EF * Fuel Usage * Fuel Heat Value * 2.20462 lb/kg * 1 ton/2000 lb

CO₂e tpy Emission Rate = CO₂ Emission Rate + N₂O Emission Rate * GWP Factor + CH₄ Emission Rate * GWP Factor

Boiler BB-4

Heater Input Information			
Unit(s):	BB-4		
Description:	2 MMBtu/hr Boiler CFH-700-50-150ST		
Heat input:	2.0 MMBtu/hr	Estimated heat input	
Fuel heat value:	1,020 Btu/scf		
Fuel sulfur content:	2.0 gr S/100scf	Estimated for field gas	
Operating hours:	8,760 hours/year		
Fuel Usage:	1,961 scf/hr		
	17.18 MMscf/yr		

Criteria Pollutant Emission Rates per Unit						
	NO _x	CO	VOC	SO ₂ ¹	PM ²	Units
Emission Factors	100	84	5.5	-	7.6	lb/MMscf
	100.0	84.0	5.5	-	7.6	lb/MMscf
Emissions	0.20	0.16	0.011	0.011	0.015	lb/hr ³
	0.86	0.72	0.047	0.049	0.065	tons/year ⁴

HAP Emission Rates per Unit							
	Hexane	Benzene	Toluene	HCHO	Total HAPs ⁵	Units	Notes
Emission Factors	1.8	2.10E-03	3.40E-03	0.075	-	lb/MMscf	AP-42 Table 1.4-3
	1.8	2.10E-03	3.40E-03	7.50E-02	-	lb/MMscf	Adjusted EF, per footnote a in Table 1.4-3
Emissions	0.0035	4.12E-06	6.67E-06	1.47E-04	0.0037	lb/hr ³	
	0.015	1.80E-05	2.92E-05	6.44E-04	0.016	tons/year ⁴	

GHG Calculations				
	CO ₂ ⁶	N ₂ O ⁶	CH ₄ ⁶	CO ₂ e ⁶
	53.06 1	0.0001 298	0.001 25	kg/MMBtu GWP
	1024.72	0.0019	0.019	tpy
	1024.72	0.58	0.48	1024.74 1025.78

¹ SO₂ emissions based on fuel sulfur content of 2 gr S/100 scf or 0.00286 lb S/MMscf

0.00286 lb S/MMscf*fuel consumption (Mscf/hr)*64 lb SO₂/32 lb S = lb SO₂/hr

² Assumes PM₁₀ = PM_{2.5}

³ lb/hr emissions calculated using the following methods:

Criteria and HAPs lb/hr = EF (lb/MMscf) * Rating (MMBtu/hr) / Heat value (Btu/scf)

⁴ For all non-HAP calculations, tons/year = lb/hr * Operating hours * 1ton/2000lb

⁵ Total HAP emissions are the sum of all individual HAPs calculated.

⁶ N₂O, CH₄, and CO₂ tpy Emission Rate = EF * Fuel Usage * Fuel Heat Value * 2.20462 lb/kg * 1 ton/2000 lb

CO₂e tpy Emission Rate = CO₂ Emission Rate + N₂O Emission Rate * GWP Factor + CH₄ Emission Rate * GWP Factor

Boiler BB-6

Heater Input Information			
Unit(s):	BB-6		
Description:	2 MMBtu/hr Boiler CFH-700-50-150ST		
Heat input:	2.0 MMBtu/hr	Estimated heat input	
Fuel heat value:	1,020 Btu/scf		
Fuel sulfur content:	2.0 gr S/100scf	Estimated for field gas	
Operating hours:	8,760 hours/year		
Fuel Usage:	1,961 scf/hr		
	17.18 MMscf/yr		

Criteria Pollutant Emission Rates per Unit				
	NO _x	CO	VOC	PM ₁₀ ¹
Emission Factors	100	84	5.5	7.6
	100.0	84.0	5.5	7.6
Emissions	0.20	0.16	0.011	0.015
	0.86	0.72	0.047	0.065
				lb/hr ³
				tons/year ⁴

AP-42 Table 1.4-1 & 2
Adjusted EF, per footnote a in Tables 1.4-1 and 1.4-2

HAP Emission Rates per Unit			
	Hexane	Benzene	Toluene
Emission Factors	1.8	2.10E-03	3.40E-03
	1.8	2.10E-03	3.40E-03
Emissions	0.0035	4.12E-06	6.67E-06
	0.015	1.80E-05	2.92E-05
			lb/hr ³
			tons/year ⁴

HAP Emission Rates per Unit

Total HAPs⁵

-

-

0.0037

0.016

GHG Calculations			
	CO ₂ ⁶	N ₂ O ⁶	CH ₄ ⁶
	53.06	0.0001	0.001
	1	298	25
	1024.72	0.0019	0.019
	1024.72	0.58	0.48
			kg/MMBtu
			GWP
			tpy
			tpy CO ₂ e

40 CFR 98 Subpart Tables
40 CFR 98 Table A-1

¹ SO₂ emissions based on fuel sulfur content of 2 gr S/100 scf or 0.00286 lb S/MMscf
0.00286 lb S/MMscf * fuel consumption (MMscf/hr) * 64 lb SO₂/32 lb S = lb SO₂/hr

² Assumes PM₁₀ = PM_{2.5}

³ lb/hr emissions calculated using the following methods:

Criteria and HAPs lb/hr = EF (lb/MMscf) * Rating (MMBtu/hr) / Heat value (Btu/scf)

⁴ For all non-HAP calculations, tons/year = lb/hr * Operating hours * 1ton/2000lb

⁵ Total HAP emissions are the sum of all individual HAPs calculated.

⁶ N₂O, CH₄, and CO₂ tpy Emission Rate = EF * Fuel Usage * Fuel Heat Value * 2.20462 lb/kg * 1 ton/2000 lb

CO₂e tpy Emission Rate = CO₂ Emission Rate + N₂O Emission Rate * GWP Factor + CH₄ Emission Rate * GWP Factor

OLAM Spices and Vegetables Ingredients
Finish Mill **M-7**

Input Information			
Unit(s):	M-7		
Description:	Baurmeister UT33 Finish Mill		
Capacity:	8000	lb/hr	
Cyclone Efficiency ¹ :	85%	%	
Baghouse Control Efficiency ¹ :	99.9%	%	Manufacturer Specification
Operating hours:	8,760	hours/year	

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Units
Particle Size Distribution (Emission Factors)	0.0012 1.8%	0.00054 45%	0.0001 25%	lb/1000lb %
Cooker/Blender Emissions	21.60 94.61	9.72 42.57	2.43 10.64	lb/hr tons/year
Q-Line Mill Emissions	21.60 94.61	9.72 42.57	2.43 10.64	lb/hr tons/year
Total Uncontrolled Emissions	43.20 94.63	19.44 43.02	4.86 10.89	lb/hr tons/year
Total Controlled Emissions	0.043 0.173	1.94E-02 7.78E-02	4.86E-03 1.94E-02	lb/hr tons/year

Notes

AP-42 Table 11.19.2-2-1, Tertiary Crushing (controlled)²
PM Content of Material, Sieve Analysis^{3,4}
Emissions = (Capacity) * (PM Content) * (1 - Cyclone Efficiency)
Emissions = (Capacity) * (PM Content) * (1 - Cyclone Efficiency)
Emissions = (Cooker/Blender) + (Q-Line Mill)
Emissions = (Cooker/Blender + Q-Line Mill) * (1-Baghouse)

Notes

- The raw from each mill is pneumatically conveyed to a cyclone which has a nominal product capture efficiency of 85% where it discharges into Baghouse #9 which has a control efficiency of 99.9%. Kice Baghouse filter control efficiency is 99.9% on 5 micron, 99.99% on 10 micron, and 100% for 15+ micron grain dust particles per Kice Industries, Inc letter dated 11/12/08.
- There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing is used as the best fit for estimating particle distribution.
- Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.
- Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

OLAM Spices and Vegetables Ingredients
Steam Sterilizer SS-2

Input Information			
Unit(s):	SS-2		
Description:	Safesteril Steam Sterilizer		
Capacity:	5000	lb/hr	
Cyclone Efficiency ¹ :	85%	%	
Baghouse Control Efficiency ¹ :	99.9%	%	Manufacturer Specification
Operating hours:	8,760	hours/year	

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Units
Particle Size Distribution and Emission Factors	0.0012 1.8% 0.0036	0.00054 45% 0.0016	0.0001 25% 0.0004	lb/1000lb % lb/1000lb
Box Dump	18.00 78.84	8.10 35.48	2.03 8.87	lb/hr tons/year
Steam Sterilizer	90.00 394.20	40.50 177.39	10.13 44.35	lb/hr tons/year
Total Uncontrolled Emissions	108.00 473.04	48.60 212.87	12.15 53.22	lb/hr tons/year
Total Controlled Emissions	0.032 0.14	0.014 0.062	3.54E-03 0.016	lb/hr tons/year

		Notes
AP-42 Table 11.19.2-2-1, Tertiary Crushing (controlled) ²		
PM Content of Material, Sieve Analysis ^{3,4}		
AP-42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing ⁵		
Emissions = (Capacity) * (AP-42 Section 11.26 Table 11.26-1 EF)		
Emissions = (Capacity) * (PM Content)		
Emissions = (Box Dump) + (Steam Sterilizer)		
Emissions = (Box Dump/1000) + ((Steam Sterilizer) * (1- Cyclone Efficiency) * (1-Baghouse))		

Notes

- This unit has an associated cyclone with a nominal product capture efficiency of 85%. The cyclone then discharges into Baghouse #11 which has a control efficiency of 99.9%
- There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing is used as the best fit for estimating particle distribution.
- Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.
- Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.
- The best fit emission factor for the Box Dump is from AP42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing, "Crushed talc storage bin loading, with fabric filter (SCC 3-05-089-14)." Partition factors of 45% and 25% are used for PM10 and PM2.5 emission factors, respectively.

Dryer **GB-1**

Heater Input Information			
GB-1			
Description:	29.6 MMBtu/hr Packaged Dryer		
Heat input:	29.6 MMBtu/hr	Estimated heat input	
Fuel heat value:	1,020 Btu/scf		
Fuel sulfur content:	2.0 gr S/100scf	Estimated for field gas	
Operating hours:	8,760 hours/year		
Fuel Usage:	29,020 scf/hr		
	254.21 MMscf/yr		

Criteria Pollutant Emission Rates per Unit						
	NO _x	CO	VOC	SO ₂ ¹	PM ²	Units
Emission Factors	100	84	5.5	0.6	7.6	lb/MMscf
	100.0	84.0	5.5	-	7.6	lb/MMscf
Emissions	2.90	2.44	0.16	0.17	0.22	lb/hr ³
	12.71	10.68	0.70	0.73	0.97	tons/year ⁴

HAP Emission Rates per Unit							
	Hexane	Benzene	Toluene	HCHO	Total HAPs ⁵	Units	Notes
Emission Factors	1.8	2.10E-03	3.40E-03	0.075	-	lb/MMscf	AP-42 Table 1.4-3
	1.8	2.10E-03	3.40E-03	7.50E-02	-	lb/MMscf	Adjusted EF, per footnote a in Table 1.4-3
Emissions	0.052	6.09E-05	9.87E-05	2.18E-03	0.0546	lb/hr ³	
	0.23	2.67E-04	4.32E-04	9.53E-03	0.239	tons/year ⁴	

GHG Calculations					
	CO ₂ ⁶	N ₂ O ⁶	CH ₄ ⁶	CO ₂ e ⁶	
	53.06	0.0001	0.001		kg/MMBtu GWP
	1	298	25		
	15165.85	0.029	0.29		
	15165.85	8.52	7.15	15181.52	tpy CO2e

¹ SO₂ emissions based on fuel sulfur content of 2 gr S/100 scf or 0.00286 lb S/MMscf

0.00286 lb S/MMscf*fuel consumption (Mscf/hr)*64 lb SO₂/32 lb S = lb SO₂/hr

² Assumes PM₁₀ = PM_{2.5}

³ lb/hr emissions calculated using the following methods:

Criteria and HAPs lb/hr = EF (lb/MMscf) * Rating (MMBtu/hr) / Heat value (Btu/scf)

⁴ For all non-HAP calculations, tons/year = lb/hr * Operating hours * 1ton/2000lb

⁵ Total HAP emissions are the sum of all individual HAPs calculated.

⁶ N₂O, CH₄, and CO₂ tpy Emission Rate = EF * Fuel Usage * Fuel Heat Value * 2.20462 lb/kg * 1 ton/2000 lb

CO₂e tpy Emission Rate = CO₂ Emission Rate + N₂O Emission Rate * GWP Factor + CH₄ Emission Rate * GWP Factor

40 CFR 98 Subpart Tables
40 CFR 98 Table A-1

Dryer GB-2

Heater Input Information			
Unit(s):	GB-2		
Description:	24.6 MMBtu/hr Packaged Dryer		
Heat input:	24.6	MMBtu/hr	Estimated heat input
Fuel heat value:	1,020	Btu/scf	
Fuel sulfur content:	2.0	gr S/100scf	Estimated for field gas
Operating hours:	8,760	hours/year	
Fuel Usage:	24,118	scf/hr	
	211.27	MMscf/yr	

Criteria Pollutant Emission Rates per Unit						
	NO _x	CO	VOC	SO ₂ ¹	PM ₂ ²	Units
Emission Factors	100	84	5.5	-	7.6	lb/MMscf
	100.0	84.0	5.5	-	7.6	lb/MMscf
Emissions	2.41	2.03	0.13	0.14	0.18	lb/hr ³
	10.56	8.87	0.58	0.60	0.80	tons/year ⁴
AP-42 Table 1.4-1 & 2						
Adjusted EF, per footnote a in Tables 1.4-1 and 1.4-2						

HAP Emission Rates per Unit							
	Hexane	Benzene	Toluene	HCHO	Total HAPs ⁵	Units	Notes
Emission Factors	1.8	2.10E-03	3.40E-03	0.075	-	lb/MMscf	AP-42 Table 1.4-3
	1.8	2.10E-03	3.40E-03	7.50E-02	-	lb/MMscf	Adjusted EF, per footnote a in Table 1.4-3
Emissions	0.043	5.06E-05	8.20E-05	1.81E-03	0.045	lb/hr ³	
	0.19	2.22E-04	3.59E-04	7.92E-03	0.20	tons/year ⁴	

GHG Calculations			
	CO ₂ ⁶	N ₂ O ⁶	CH ₄ ⁶ CO ₂ e ⁶
	53.06	0.0001	0.001
	1	298	25
	12604.05	0.0238	0.24
	12604.05	7.08	5.94
			12604.31
			12617.07
			tpy CO2e

¹ SO₂ emissions based on fuel sulfur content of 2 gr S/100 scf or 0.00286 lb S/MMscf
0.00286 lb S/MMscf * fuel consumption (Mscf/hr) * 64 lb SO₂/32 lb S = lb SO₂/hr

² Assumes PM₁₀ = PM_{2.5}

³ lb/hr emissions calculated using the following methods:

Criteria and HAPs lb/hr = EF (lb/MMscf) * Rating (MMBtu/hr) / Heat value (Btu/scf)

⁴ For all non-HAP calculations, tons/year = lb/hr * Operating hours * 1ton/2000lb

⁵ Total HAP emissions are the sum of all individual HAPs calculated.

⁶ N₂O, CH₄, and CO₂ tpy Emission Rate = EF * Fuel Usage * Fuel Heat Value * 2.20462 lb/kg * 1 ton/2000 lb

CO₂e tpy Emission Rate = CO₂ Emission Rate + N₂O Emission Rate * GWP Factor + CH₄ Emission Rate * GWP Factor

40 CFR 98 Subpart Tables

40 CFR 98 Table A-1

Emission Calculations for Chile Dryers
Las Cruces Chili Processing Plant

Emission Stack/Unit ID	Capacity (MMBtu/hr)	Pollutant	Emission Factor ¹ (lb/10 ⁶ scf)	Emissions ² (lb/hr)	Annual Emissions ³ (tpy)
GB-1A-1	5.2	NO _x	100	0.50980	2.23
		CO	84	0.42824	1.88
		VOC	5.5	0.02804	0.12
		SO _x	0.6	0.00306	0.013
		PM	7.6	0.03875	0.17
		PM ₁₀	7.6	0.03875	0.17
		PM _{2.5}	7.6	0.03875	0.17
GB-1A-2A	3.6	NO _x	100	0.35294	1.55
		CO	84	0.29647	1.30
		VOC	5.5	0.01941	0.085
		SO _x	0.6	0.00212	0.0093
		PM	7.6	0.02682	0.12
		PM ₁₀	7.6	0.02682	0.12
		PM _{2.5}	7.6	0.02682	0.12
GB-1A-2B	3.6	NO _x	100	0.35294	1.55
		CO	84	0.29647	1.30
		VOC	5.5	0.01941	0.085
		SO _x	0.6	0.00212	0.0093
		PM	7.6	0.02682	0.12
		PM ₁₀	7.6	0.02682	0.12
		PM _{2.5}	7.6	0.02682	0.12
GB-1A-3A	2.8	NO _x	100	0.27451	1.20
		CO	84	0.23059	1.01
		VOC	5.5	0.01510	0.066
		SO _x	0.6	0.00165	0.0072
		PM	7.6	0.02086	0.091
		PM ₁₀	7.6	0.02086	0.091
		PM _{2.5}	7.6	0.02086	0.091
GB-1A-3B	2.8	NO _x	100	0.27451	1.20
		CO	84	0.23059	1.01
		VOC	5.5	0.01510	0.066
		SO _x	0.6	0.00165	0.0072
		PM	7.6	0.02086	0.091
		PM ₁₀	7.6	0.02086	0.091
		PM _{2.5}	7.6	0.02086	0.091
GB-1A-4	2.8	NO _x	100	0.27451	1.20
		CO	84	0.23059	1.01
		VOC	5.5	0.01510	0.066
		SO _x	0.6	0.00165	0.0072
		PM	7.6	0.02086	0.091
		PM ₁₀	7.6	0.02086	0.091
		PM _{2.5}	7.6	0.02086	0.091
GB-1A-5	2.4	NO _x	100	0.23529	1.03
		CO	84	0.19765	0.87
		VOC	5.5	0.01294	0.057
		SO _x	0.6	0.00141	0.0062
		PM	7.6	0.01788	0.078
		PM ₁₀	7.6	0.01788	0.078
		PM _{2.5}	7.6	0.01788	0.078

Emission Calculations for Chile Dryers GB-1

Emission Stack/Unit ID	Capacity (MMBtu/hr)	Pollutant	Emission Factor ¹ (lb/10 ⁶ scf)	Emissions ² (lb/hr)	Annual Emissions ³ (tpy)
GB-1B-1	2.8	NO _x	100	0.27451	1.20
		CO	84	0.23059	1.01
		VOC	5.5	0.01510	0.066
		SO _x	0.6	0.00165	0.0072
		PM	7.6	0.02086	0.091
		PM ₁₀	7.6	0.02086	0.091
		PM _{2.5}	7.6	0.02086	0.091
GB-1B-2	1.2	NO _x	100	0.11765	0.52
		CO	84	0.09882	0.43
		VOC	5.5	0.00647	0.028
		SO _x	0.6	0.00071	0.0031
		PM	7.6	0.00894	0.039
		PM ₁₀	7.6	0.00894	0.039
		PM _{2.5}	7.6	0.00894	0.039
GB-1C-1	0.8	NO _x	100	0.07843	0.34
		CO	84	0.06588	0.29
		VOC	5.5	0.00431	0.019
		SO _x	0.6	0.00047	0.0021
		PM	7.6	0.00596	0.026
		PM ₁₀	7.6	0.00596	0.026
		PM _{2.5}	7.6	0.00596	0.026
GB-1C-2	0.8	NO _x	100	0.07843	0.34
		CO	84	0.06588	0.29
		VOC	5.5	0.00431	0.019
		SO _x	0.6	0.00047	0.0021
		PM	7.6	0.00596	0.026
		PM ₁₀	7.6	0.00596	0.026
		PM _{2.5}	7.6	0.00596	0.026
GB-1C-3	0.8	NO _x	100	0.07843	0.34
		CO	84	0.06588	0.29
		VOC	5.5	0.00431	0.019
		SO _x	0.6	0.00047	0.0021
		PM	7.6	0.00596	0.026
		PM ₁₀	7.6	0.00596	0.026
		PM _{2.5}	7.6	0.00596	0.026
Emission Unit GB-1 Total ⁴	29.6	NO _x	100	2.90	12.71
		CO	84	2.44	10.68
		VOC	5.5	0.16	0.70
		SO _x	0.6	0.017	0.076
		PM	7.6	0.22	0.97
		PM ₁₀	7.6	0.22	0.97
		PM _{2.5}	7.6	0.22	0.97

Emission Calculations for Chile
Dryers
GB-2

Emission Stack/Unit ID	Capacity (MMBtu/hr)	Pollutant	Emission Factor ¹ (lb/10 ⁶ scf)	Emissions ² (lb/hr)	Annual Emissions ³ (tpy)
GB-2A-1	9.0	NO _x	100	0.88235	3.86
		CO	84	0.74118	3.25
		VOC	5.5	0.04853	0.21
		SO _x	0.6	0.00529	0.023
		PM	7.6	0.06706	0.29
		PM ₁₀	7.6	0.06706	0.29
		PM _{2.5}	7.6	0.06706	0.29
GB-2A-2A	2.8	NO _x	100	0.27451	1.20
		CO	84	0.23059	1.01
		VOC	5.5	0.01510	0.066
		SO _x	0.6	0.00165	0.0072
		PM	7.6	0.02086	0.091
		PM ₁₀	7.6	0.02086	0.091
		PM _{2.5}	7.6	0.02086	0.091
GB-2A-2B	2.8	NO _x	100	0.27451	1.20
		CO	84	0.23059	1.01
		VOC	5.5	0.01510	0.066
		SO _x	0.6	0.00165	0.0072
		PM	7.6	0.02086	0.091
		PM ₁₀	7.6	0.02086	0.091
		PM _{2.5}	7.6	0.02086	0.091
GB-2A-3A	2.4	NO _x	100	0.23529	1.03
		CO	84	0.19765	0.87
		VOC	5.5	0.01294	0.057
		SO _x	0.6	0.00141	0.0062
		PM	7.6	0.01788	0.078
		PM ₁₀	7.6	0.01788	0.078
		PM _{2.5}	7.6	0.01788	0.078
GB-2A-3B	2.4	NO _x	100	0.23529	1.03
		CO	84	0.19765	0.87
		VOC	5.5	0.01294	0.057
		SO _x	0.6	0.00141	0.0062
		PM	7.6	0.01788	0.078
		PM ₁₀	7.6	0.01788	0.078
		PM _{2.5}	7.6	0.01788	0.078
GB-2B-1	1.6	NO _x	100	0.15686	0.69
		CO	84	0.13176	0.58
		VOC	5.5	0.00863	0.038
		SO _x	0.6	0.00094	0.0041
		PM	7.6	0.01192	0.052
		PM ₁₀	7.6	0.01192	0.052
		PM _{2.5}	7.6	0.01192	0.052
GB-2B-2	1.2	NO _x	100	0.11765	0.52
		CO	84	0.09882	0.43
		VOC	5.5	0.00647	0.028
		SO _x	0.6	0.00071	0.0031
		PM	7.6	0.00894	0.039
		PM ₁₀	7.6	0.00894	0.039
		PM _{2.5}	7.6	0.00894	0.039

Emission Calculations for Chile Dryers GB-2

Emission Stack/Unit ID	Capacity (MMBtu/hr)	Pollutant	Emission Factor ¹ (lb/10 ⁶ scf)	Emissions ² (lb/hr)	Annual Emissions ³ (tpy)
GB-2C-1	0.8	NO _x	100	0.07843	0.34
		CO	84	0.06588	0.29
		VOC	5.5	0.00431	0.019
		SO _x	0.6	0.00047	0.0021
		PM	7.6	0.00596	0.026
		PM ₁₀	7.6	0.00596	0.026
		PM _{2.5}	7.6	0.00596	0.026
GB-2C-2	0.8	NO _x	100	0.07843	0.34
		CO	84	0.06588	0.29
		VOC	5.5	0.00431	0.019
		SO _x	0.6	0.00047	0.0021
		PM	7.6	0.00596	0.026
		PM ₁₀	7.6	0.00596	0.026
		PM _{2.5}	7.6	0.00596	0.026
GB-2C-3	0.8	NO _x	100	0.07843	0.34
		CO	84	0.06588	0.29
		VOC	5.5	0.00431	0.019
		SO _x	0.6	0.00047	0.0021
		PM	7.6	0.00596	0.026
		PM ₁₀	7.6	0.00596	0.026
		PM _{2.5}	7.6	0.00596	0.026
Emission Unit GB-2 Total ⁴	24.6	NO _x	100	2.41	10.56
		CO	84	2.03	8.87
		VOC	5.5	0.13	0.58
		SO _x	0.6	0.014	0.063
		PM	7.6	0.18	0.80
		PM ₁₀	7.6	0.18	0.80
		PM _{2.5}	7.6	0.18	0.80

Combined Annual Emissions for the Chile Dryers (tpy)						
NO _x	CO	VOC	SO _x	PM	PM ₁₀	PM _{2.5}
23.27	19.55	1.28	0.14	1.77	1.77	1.77

¹ Emission factors from AP-42 Section 1.4 Tables 1.4-1 and 1.4-2. Particulate Matter is assumed to be equal to PM with an aerodynamic diameter less than or equal to 10 mm (PM₁₀) and equal to PM with an aerodynamic diameter less than or equal to 2.5 mm (PM_{2.5}).

² Hourly emission calculation methodology:

$$\text{Hourly Emissions (lb/hr)} = \text{Capacity (MMBtu/hr)} * \text{Emission Factor (lb/10}^6 \text{ scf)} * 1/\text{HV}$$

Where: HV= heating value of natural gas (1020 Btu/scf)

³ Annual emission calculation methodology:

$$\text{Annual Emissions (tpy)} = \text{Hourly Emissions (lb/hr)} * 8760 \text{ hrs/year} * 1 \text{ ton/2000 lbs}$$

⁴ Unit capacities are a sum of the individual capacity of each burner contained in the unit.

OLAM Spices and Vegetables Ingredients

Bag Lines

Input Information			
Unit(s):	Bag Line 1 & Bag Line 2		
Description:	Packaging Lines		
Permitted Capacity:	4000	lb/hr	
Operating hours:	8,760	hours/year	

Criteria Pollutant Emission Rates per Unit					
	PM	PM ₁₀	PM _{2.5}	Units	Notes
Emission Factors	0.009	0.004	0.001	lb/1000lb	AP-42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing ²
		45%	25%	%	PM Content of Material, Sieve Analysis ^{3,4}
Uncontrolled Emissions ¹	0.036	0.016	4.05E-03	lb/hr	Emissions = (Capacity)*(AP-42 Section 11.26 Table 11.26-1 EF)/1000
	0.16	0.071	0.018	tons/year	

Notes

- ¹ Emission factors include the control from a fabric filter, the baghouse control and hood capture efficiencies are not applied to this emission calculation. However, Bag Line 1 and Bag Line 2 are controlled by Baghouse #6.
- ² There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. Emission factor is the best fit from AP42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing. "Packaging, with fabric filter (SCC 3-05-089-88)". Partition factors of 45% and 25% are used for PM10 and PM2.5 emission factors, respectively.
- ³ Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.
- ⁴ Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

OLAM Spices and Vegetables Ingredients

Tote Line

Input Information			
Unit(s):	Tote Line		
Description:	Packaging Lines		
Permitted Capacity:	4000	lb/hr	
Operating hours:	8,760	hours/year	

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Units
Emission Factors	0.009	0.004	0.001	lb/1000lb
		45%	25%	%
Uncontrolled Emissions ¹	0.036	0.016	4.05E-03	lb/hr
	0.16	0.071	0.018	tons/year
	Emissions = (Capacity)*(AP-42 Section 11.26 Table 11.26-1 EF)/1000			
	AP-42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing ² PM Content of Material, Sieve Analysis ^{3,4}			

Notes

- 1 Emission factors include the control from a fabric filter, the baghouse control and hood capture efficiencies are not applied to this emission calculation. However, Tote Line is controlled by Baghouse #6.
- 2 There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. Emission factor is the best fit from AP42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing, "Packaging, with fabric filter (SCC 3-05-089-88)". Partition factors of 45% and 25% are used for PM10 and PM2.5 emission factors, respectively.
- 3 Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.
- 4 Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

Cooking Blenders C-BL

Input Information				
Unit(s):	C-BL			
Description:	Three Americal Process 270 and AP Scott 270x Cooking Blenders			
Capacity:	24000	lb/hr	Three (3) cooking blenders each with a capacity of 8,000 lb/hr.	
Cyclone Efficiency ¹ :	85%	%		
Baghouse Control Efficiency ¹ :	99.9%	%	Manufacturer Specification	
Operating hours:	8,760	hours/year		

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Units
Particle Size Distribution (Emission Factors)	0.0012 1.8% 0.0036	0.00054 45% 0.0016	0.0001 25% 0.0004	lb/1000lb % lb/1000lb
Box Dumps	86.40 378.43	38.88 170.29	9.72 42.57	lb/hr tons/year
Cooker/Blenders	64.80 283.82	29.16 127.72	7.29 31.93	lb/hr tons/year
Total Uncontrolled Emissions	151.20 662.26	68.04 298.02	17.01 74.50	lb/hr tons/year
Total Controlled Emissions	0.15 0.66	0.068 0.30	1.70E-02 0.075	lb/hr tons/year
				Emissions = (Capacity)*(AP-42 Section 11.26 Table 11.26-1 EF)
				Emissions = (Capacity)*(PM Content)*(1 - Cyclone Efficiency)
				Emissions = (Box Dump) + (Cooker/Blenders)
				Emissions = (Box Dump/1000) + ((Cooker/Blenders)*(1-Baghouse))

Notes

- This unit has an associated cyclone with a nominal product capture efficiency of 85%. The cyclone then discharges into Baghouse #4 which has a control efficiency of 99.9%. Kice Baghouse filter control efficiency is 99.9% on 5 micron, 99.99% on 10 micron, and 100% for 15+ micron grain dust particles per Kice Industries, Inc letter dated 11/12/08.
- There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing is used as the best fit for estimating particle distribution.
- Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.
- Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.
- The best fit emission factor for the Box Dump is from AP42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing, "Crushed talc storage bin loading, with fabric filter (SCC 3-05-089-14)." Partition factors of 45% and 25% are used for PM10 and PM2.5 emission factors, respectively.

Carton Line

Input Information			
Unit(s):	Carton Line		
Description:	Packaging Lines		
Permitted Capacity:	4000	lb/hr	
Operating hours:	8,760	hours/year	

Criteria Pollutant Emission Rates per Unit					
	PM	PM ₁₀	PM _{2.5}	Units	Notes
Emission Factors	0.009	0.004	0.001	lb/1000lb	AP-42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing ²
		45%	25%	%	PM Content of Material, Sieve Analysis ^{3,4}
Uncontrolled Emissions ¹	0.036	0.016	4.05E-03	lb/hr	Emissions = (Capacity)*(AP-42 Section 11.26 Table 11.26-1 EF)/1000
	0.16	0.071	0.018	tons/year	

Notes

¹ Emission factors include the control from a fabric filter, the baghouse control and hood capture efficiencies are not applied to this emission calculation. However, Carton Line is controlled by Baghouse #6.

² There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. Emission factor is the best fit from AP42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing. "Packaging, with fabric filter (SCC 3-05-089-88)". Partition factors of 45% and 25% are used for PM10 and PM2.5 emission factors, respectively.

³ Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.

⁴ Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

Process Dust Collection DC-1

Input Information			
Unit(s):	DC-1		
Description:	Kice Industries VS100-10 Dust Collector		
Capacity:	350	lb/hr	
Cyclone Efficiency ¹ :	85%	%	
Baghouse Control Efficiency ¹ :	99.9%	%	Manufacturer Specification
Operating hours:	8,760	hours/year	

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Notes
Particle Size Distribution and Emission Factors	0.0012 1.8% 0.0036	0.00054 45% 0.0016	0.0001 25% 0.0004	AP-42 Table 11.19.2-2-1, Tertiary Crushing (controlled) ² PM Content of Material, Sieve Analysis ^{3,4} AP-42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing ⁵
Box Dumps	1.26 5.52	0.57 2.48	0.14 0.62	Emissions = (Capacity) * (AP-42 Section 11.26 Table 11.26-1 EF)
Corn Cutter Mill Emissions	0.95 4.14	0.43 1.86	0.11 0.47	Emissions = (Capacity) * (PM Content) * (1 - Cyclone Efficiency)
Total Uncontrolled Emissions	2.21 9.66	0.99 4.35	0.25 1.09	Emissions = (Corn Cutter Mill) + (Box Dumps)
Total Controlled Emissions	2.21E-03 9.66E-03	9.92E-04 4.35E-03	2.48E-04 1.09E-03	Emissions = ((Box Dumps)/1000) + ((Corn Cutter Mill) * (1-Baghouse))

Notes

¹ This unit has an associated cyclone with a nominal product capture efficiency of 85%. The cyclone then discharges into Baghouse #10 which has a control efficiency of 99.9%. Farr Baghouse uses Camcorp filters with a control efficiency of 99.9% for particulate greater than 0.5 microns in diameter per Camcorp "Dust Collector Efficiency Statement" dated 05/09/06.

² There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing is used as the best fit for estimating particle distribution.

³ Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.

⁴

Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

⁵ The best fit emission factor for the Box Dump is from AP42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing, "Crushed talc storage bin loading, with fabric filter (SCC 3-05-089-14)." Partition factors of 45% and 25% are used for PM10 and PM2.5 emission factors, respectively.

Process Dust Collection DC-2

Input Information			
Unit(s):	DC-2		
Description:	Kice Industries S100-10 Dust Collector		
Capacity:	24000	lb/hr	
Cyclone Efficiency ¹ :	85%	%	
Baghouse Control Efficiency ¹ :	99.9%	%	Manufacturer Specification
Operating hours:	8,760	hours/year	

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Units
Particle Size Distribution (Emission Factors)	0.0012 1.8%	0.00054 45%	0.0001 25%	lb/1000lb %
Uncontrolled Emissions	64.80 283.82	29.16 127.72	7.29 31.93	lb/hr tons/year
Controlled Emissions	0.065 0.284	0.029 0.128	7.29E-03 0.032	lb/hr tons/year
				Notes
				AP-42 Table 11.19.2-2-1, Tertiary Crushing (controlled) ² PM Content of Material, Sieve Analysis ^{3,4}
				Emissions = (Capacity)*(PM Content)*(1 - Cyclone Efficiency)
				Emissions = (Uncontrolled Emissions)*(1-Baghouse Control Efficiency)

Notes

- ¹ This unit has an associated cyclone with a nominal product capture efficiency of 85%. The cyclone then discharges into Baghouse #8 which has a control efficiency of 99.9%. Kice Baghouse filter control efficiency is 99.9% on 5 micron, 99.99% on 10 micron, and 100% for 15+ micron grain dust particles per Kice Industries, Inc letter dated 11/12/08.
- ² There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing is used as the best fit for estimating particle distribution.
- ³ Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.
- ⁴ Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

Drum Lines

Input Information			
Unit(s):	Drum Line 1 & Drum Line 2		
Description:	Packaging Lines		
Permitted Capacity:	4000	lb/hr	
Operating hours:	8,760	hours/year	

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Units
Emission Factors	0.009	0.004	0.001	lb/1000lb
		45%	25%	%
Uncontrolled Emissions ¹	0.036	0.016	4.05E-03	lb/hr
	0.16	0.071	0.018	tons/year
	Emissions = (Capacity)*(AP-42 Section 11.26 Table 11.26-1 EF)/1000			
	AP-42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing ² PM Content of Material, Sieve Analysis ^{3,4}			

Notes

- ¹ Emission factors include the control from a fabric filter, the baghouse control and hood capture efficiencies are not applied to this emission calculation. However, Drum Line 1 is controlled by Baghouse #5 and Drum Line 2 are controlled by Baghouse #6.
- ² There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. Emission factor is the best fit from AP42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing, "Packaging, with fabric filter (SCC 3-05-089-88)". Partition factors of 45% and 25% are used for PM10 and PM2.5 emission factors, respectively.
- ³ Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.
- ⁴ Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

Final Line Hoppers F-HP

Input Information			
Unit(s):	F-HP		
Description:	Three Final Cooker/Blender Hoppers		
Capacity:	24000	lb/hr	Three (3) final Cooker/Blender Hoppers each with a capacity of 8,000 lb/hr.
Cyclone Efficiency ¹ :	85%	%	
Baghouse Control Efficiency ² :	99.9%	%	Manufacturer Specification
Operating hours:	8,760	hours/year	

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Units
Particle Size Distribution (Emission Factors)	0.0012 1.8%	0.00054 45%	0.0001 25%	lb/1000lb %
Uncontrolled Emissions	64.80 283.82	29.16 127.72	7.29 31.93	lb/hr tons/year
Controlled Emissions	0.065 0.28	0.029 0.13	7.29E-03 0.032	lb/hr tons/year
	Notes			
	AP-42 Table 11.19.2-2-1, Tertiary Crushing (controlled) ² PM Content of Material, Sieve Analysis ^{3,4}			
	Emissions = (Capacity) *(PM Content) *(1 - Cyclone Efficiency)			
	Emissions = (Uncontrolled Emissions) *(1-Baghouse Control Efficiency)			

Notes

- This unit has an associated cyclone with a nominal product capture efficiency of 85%. The cyclone then discharges into Baghouse #7 which has a control efficiency of 99.9%. Kice Baghouse filter control efficiency is 99.9% on 5 micron, 99.99% on 10 micron, and 100% for 15+ micron grain dust particles per Kice Industries, Inc letter dated 11/12/08.
- There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing is used as the best fit for estimating particle distribution.
- Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.
- Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

Finishing Blenders F-BL

Input Information			
Unit(s):	F-BL		
Description:	Three Shop Finishing Blenders		
Capacity:	24000	lb/hr	Three (3) finishing blenders each with a capacity of 8,000 lb/hr.
Cyclone Efficiency ¹ :	85%	%	
Baghouse Control Efficiency ¹ :	99.9%	%	Manufacturer Specification
Operating hours:	8,760	hours/year	

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Units
Particle Size Distribution (Emission Factors)	0.0012 1.8%	0.00054 45%	0.0001 25%	lb/1000lb %
Uncontrolled Emissions	64.80 283.82	29.16 127.72	7.29 31.93	lb/hr tons/year
Controlled Emissions	0.065 0.28	0.029 0.13	7.29E-03 0.032	lb/hr tons/year
	Emissions = (Uncontrolled Emissions)*(1-Baghouse Control Efficiency)			

Notes

- This unit has an associated cyclone with a nominal product capture efficiency of 85%. The cyclone then discharges into Baghouse #7 which has a control efficiency of 99.9%. Kice Baghouse filter control efficiency is 99.9% on 5 micron, 99.99% on 10 micron, and 100% for 15+ micron grain dust particles per Kice Industries, Inc letter dated 11/12/08.
- There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing is used as the best fit for estimating particle distribution.
- Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.
- Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

Proctor Mill

M-1

Input Information				
Unit(s):	M-1			
Description:	Prater MM-36 Proctor Mill			
Capacity:	7500	lb/hr		
Cyclone Efficiency ¹ :	85%	%		
Baghouse Control Efficiency ¹ :	99.9%	%		Manufacturer Specification
Operating hours:	8,760	hours/year		

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Units
Particle Size Distribution (Emission Factors)	0.0012 1.8%	0.00054 45%	0.0001 25%	lb/1000lb %
Uncontrolled Emissions	20.25 88.70	9.11 39.91	2.28 9.98	lb/hr tons/year
Controlled Emissions	0.020 0.089	9.11E-03 0.040	2.28E-03 0.010	lb/hr tons/year
Notes				
Emissions = (Capacity) * (PM Content) * (1 - Cyclone Efficiency)				
Emissions = (Uncontrolled Emissions) * (1-Baghouse Control Efficiency)				

Notes

- The raw from each mill is pneumatically conveyed to a cyclone which has a nominal product capture efficiency of 85% where it discharges into Baghouse #1 which has a control efficiency of 99.9%
- There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing is used as the best fit for estimating particle distribution.
- Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.
- Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

Other Producer Mill **M-3**

Input Information			
Unit(s):	M-3		
Description:	Prater MM-36 OP Mill		
Capacity:	7500	lb/hr	
Cyclone Efficiency ¹ :	85%	%	
Baghouse Control Efficiency ¹ :	99.9%	%	Manufacturer Specification
Operating hours:	8,760	hours/year	

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Units
Particle Size Distribution and Emission Factors	0.0012 1.8%	0.00054 45%	0.0001 25%	lb/1000lb %
Hanging Sifter Emissions	20.25 88.70	9.11 39.91	2.28 9.98	lb/hr tons/year
Mill Sifter Emissions	20.25 88.70	9.11 39.91	2.28 9.98	lb/hr tons/year
Total Uncontrolled Emissions	40.50 177.39	18.23 79.83	4.56 19.96	lb/hr tons/year
Total Controlled Emissions	0.041 0.18	0.018 0.080	0.005 0.020	lb/hr tons/year

Notes

AP-42 Table 11.19.2-2-1, Tertiary Crushing (controlled)²

PM Content of Material, Sieve Analysis^{3,4}

Emissions = (Capacity) * (PM Content) * (1 - Cyclone Efficiency)

Emissions = (Capacity) * (PM Content) * (1 - Cyclone Efficiency)

Emissions = (Hanging Sifter) + (Mill Sifter)

Emissions = (Hanging sifter + Mill Sifter) * (1-Baghouse)

Notes

¹ The raw from each mill is pneumatically conveyed to a cyclone which has a nominal product capture efficiency of 85% where it discharges into Baghouse #3 which has a control efficiency of 99.9%. MikroPul Baghouse uses Camcorp filters with a control efficiency of 99.9% for particulate greater than 0.5 microns in diameter per Camcorp "Dust Collector Efficiency Statement" dated 05/09/06.

² There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing is used as the best fit for estimating particle distribution.

³ Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.

⁴

Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

Finish Mills **M-4, M-5, and M-6**

Input Information			
Unit(s):	M-4, M-5, and M-6		
Description:	Bauermeister UT Finish Mill		
Capacity:	8000	lb/hr	
Cyclone Efficiency ¹ :	85%	%	
Baghouse Control Efficiency ¹ :	99.9%	%	Manufacturer Specification
Operating hours:	8,760	hours/year	

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Units
Particle Size Distribution (Emission Factors)	0.0012 1.8%	0.00054 45%	0.0001 25%	lb/1000lb %
Uncontrolled Emissions	21.60 94.61	9.72 42.57	2.43 10.64	lb/hr tons/year
Controlled Emissions	0.022 0.095	0.010 0.043	2.43E-03 0.011	lb/hr tons/year
				Notes
				AP-42 Table 11.19.2-2-1, Tertiary Crushing (controlled) ² PM Content of Material, Sieve Analysis ^{3,4}
				Emissions = (Capacity) * (PM Content) * (1 - Cyclone Efficiency)
				Emissions = (Uncontrolled Emissions) * (1-Baghouse Control Efficiency)

Notes

- The raw from each mill is pneumatically conveyed to a cyclone which has a nominal product capture efficiency of 85% where it discharges into Baghouse #6 which has a control efficiency of 99.9%. Kice Baghouse filter control efficiency is 99.9% on 5 micron, 99.99% on 10 micron, and 100% for 15+ micron grain dust particles per Kice Industries, Inc letter dated 11/12/08.
- There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing is used as the best fit for estimating particle distribution.
- Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.
- Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

Proctor Blender P-BL

Input Information				
Unit(s):	P-BL			
Description:	Proctor Blender			
Capacity:	7500	lb/hr		
Cyclone Efficiency ¹ :	85%	%		
Baghouse Control Efficiency ¹ :	99.9%	%	Manufacturer Specification	
Operating hours:	8,760	hours/year		

Criteria Pollutant Emission Rates per Unit				
	PM	PM ₁₀	PM _{2.5}	Units
Particle Size Distribution and Emission Factors	0.0012 1.8%	0.00054 45%	0.0001 25%	lb/1000lb %
Uncontrolled Emissions	20.25 88.70	9.11 39.91	2.28 9.98	lb/hr tons/year
Controlled Emissions	0.020 0.09	0.009 0.04	0.002 0.010	lb/hr tons/year
				Notes
				AP-42 Table 11.19.2-2-1, Tertiary Crushing (controlled) ² PM Content of Material, Sieve Analysis ^{3,4}
				Emissions = (Capacity) *(PM Content) *(1 - Cyclone Efficiency)
				Emissions = (Blender Emissions) *(1-Baghouse Control Efficiency)

Notes

1 This unit has an associated cyclone with a nominal product capture efficiency of 85%. The cyclone then discharges into Baghouse #3 which has a control efficiency of 99.9%. MikroPul Baghouse uses Camcorp filters with a control efficiency of 99.9% for particulate greater than 0.5 microns in diameter per Camcorp "Dust Collector Efficiency Statement" dated 05/09/06.

2 There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing is used as the best fit for estimating particle distribution.

3 Determined through the sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. 1.8 % of the 250 micron particles will pass through a 230 micron mesh screen.

4

Determined through a sieve analysis performed by ConAgra Foods, Inc on 10/29/2008. No more than 45% of spice mass can be smaller than PM₁₀. No more than 10% of spice mass can be smaller than PM_{2.5}.

Section 7

Information Used To Determine Emissions

Information Used to Determine Emissions shall include the following:

- ☐ If manufacturer data are used, include specifications for emissions units and control equipment, including control efficiencies specifications and sufficient engineering data for verification of control equipment operation, including design drawings, test reports, and design parameters that affect normal operation.
 - ☐ If test data are used, include a copy of the complete test report. If the test data are for an emissions unit other than the one being permitted, the emission units must be identical. Test data may not be used if any difference in operating conditions of the unit being permitted and the unit represented in the test report significantly effect emission rates.
 - ☐ If the most current copy of AP-42 is used, reference the section and date located at the bottom of the page. Include a copy of the page containing the emissions factors, and clearly mark the factors used in the calculations.
 - ☐ If an older version of AP-42 is used, include a complete copy of the section.
 - ☐ If an EPA document or other material is referenced, include a complete copy.
 - ☐ Fuel specifications sheet.
 - ☐ If computer models are used to estimate emissions, include an input summary (if available) and a detailed report, and a disk containing the input file(s) used to run the model. For tank-flashing emissions, include a discussion of the method used to estimate tank-flashing emissions, relative thresholds (i.e., permit or major source (NSPS, PSD or Title V)), accuracy of the model, the input and output from simulation models and software, all calculations, documentation of any assumptions used, descriptions of sampling methods and conditions, copies of any lab sample analysis.
-

OLAM has calculated emissions from the production lines and from natural gas combustion equipment separately. The production lines produced particulate matter emissions and the calculations follow the process flow diagrams from Section 4 of this application.

Emission points vary with each line; as a general rule the production lines are sealed systems in which material is moved either by enclosed screw conveyors, gravity feed from hoppers to process equipment, or pneumatically. Emissions occur when material is introduced to the system (i.e., box dumps), where material leaves a pneumatic transfer portion of the system and enters a bult transport portion (i.e., cyclones). Some of these emission points are vented directly into the plant, and these points are not included in the plant emissions as they are not emitted to the atmosphere.

The particle distribution at this facility was determined through a sieve analysis performed on October 29, 2008. The plant produces two sizes of products, 60 Mesh and 34 Mesh (250-micron and 500-micron diameter particles, respectively). Forty percent (40%) of the final products distributed by this plant are the 60 Mesh products. The other sixty percent (60%) of the final products are the 34 Mesh products. The smallest sieve at this facility is a 230 Mesh screen (63-micron diameter particles). The results of the 2008 sieve analysis show that 1.8% of the of the 60 Mesh product will pass through a 230 Mesh screen. As a worst-case scenario for particulate emissions, it is assumed that 100% of the product processed at the Olam Spices and Vegetable Ingredients, Inc facility is 60 Mesh and that all of the particles are particulate matter.

Production Lines (C-BL, DC-1 &-2, F-BL, F-HP, P-BL)

- AP-42 Section 11.26-1 Emission Factors for Talc Processing
- Sieve Analysis

Emissions are most often vented from cyclones and box dumps to a baghouse. Cyclones serve as both process and emission control equipment in most cases, and material from some of the baghouses is also returned to the process. The basic calculation methodology for production line emissions is as follows:

$$(\text{Production line PM Emissions}) = (\text{box dump emissions}) + (\text{cyclone emissions}) + (\text{filing emissions})$$

Boiler and Dryers (BB-1, BB-4, BB-6, GB-1, GB-2):

- AP-42 Table 1.4-1 & 2
- Manufacturer Specifications
- 40 CFR 98 Subpart Tables & Table A-1

The packaged dryer units (GB-1 and GB-2) are collections of smaller burner units. The basic calculation methodology for boiler and dryer emissions are as follows:

$$\text{(Boiler/Dryer Criteria and HAPs Emissions)} = (\text{AP-42 Emission Factor}) \times (\text{heat input rating}) / (\text{heat value})$$

Packaging Lines (Bagline-1 & -2, Carton Line, Drumline-1 & -2, Tote Line)

- AP-42 Section 11.26-1 Emission Factors for Talc Processing
- Sieve Analysis

There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. Emission factor is the best fit from AP-42 Section 11.26 Table 11.26-1 Emissions Factors for Talc Processing, "Packaging, with fabric filter (SCC 3-05-089-88)". Partition factors of 45% and 25% are used for PM₁₀ and PM_{2.5} emission factors, respectively. The basic calculation methodology for packaging line emissions is as follows:

$$\text{(PM Emissions)} = (\text{AP-42 Emission Factor}) \times (\text{Unit Capacity}) / (1000)$$

Mills (M-1, M-3, M-4, M-5, M-6, M-7)

- AP-42 Table 11.19.2-2-1, Tertiary Crushing (controlled)
- Sieve Analysis

The throughput of each line is assumed to be equal to the maximum capacity of the line mills. There is no emission data quantifying VOC HAP or PM emissions from dehydrated fruit and vegetable industry are available for use in the development of emission factors. AP-42 Section 11.19.2 Crushed Stone Processing and Pulverized Mineral Processing is used as the best fit for estimating particle distribution. There are three types of mills at this facility. The basic calculation methodology for proctor mill and finish mill emissions are as follows:

$$\begin{aligned} \text{(Uncontrolled PM Emissions)} &= (\text{PM Content}) \times (\text{Unit Capacity}) \times (1 - \text{Cyclone Efficiency}) \\ \text{(Controlled PM Emissions)} &= (\text{Uncontrolled PM Emissions}) \times (1 - \text{Baghouse Control Efficiency}) \end{aligned}$$

The basic calculation methodology for OP mill emissions is as follows:

$$\begin{aligned} \text{(Hanging Sifter/Mill Sifter PM Emissions)} &= (\text{PM Content}) \times (\text{Unit Capacity}) \times (1 - \text{Cyclone Efficiency}) \\ \text{(Total Uncontrolled PM Emissions)} &= (\text{Hanging Sifter Emissions}) + (\text{Mill Sifter Emissions}) \\ \text{(Controlled PM Emissions)} &= (\text{Uncontrolled PM Emissions}) \times (1 - \text{Baghouse Control Efficiency}) \end{aligned}$$

Table 11.26-1. EMISSION FACTORS FOR TALC PROCESSING^a

EMISSION FACTOR RATING: D

Process	Total PM ^b	CO ₂
	lb/1,000 lb	lb/1,000 lb
Natural gas-fired crude ore drying with fabric filter ^c (SCC 3-05-089-09)	0.0020	ND
Primary crushing, with fabric filter ^d (SCC 3-05-089-11)	0.00074	NA
Crushed talc railcar loading ^e (SCC 3-05-089-12)	0.00049	NA
Screening, with fabric filter ^f (SCC 3-05-089-17)	0.0043	NA
Grinding, with fabric filter ^g (SCC 3-05-089-45)	0.022	NA
Grinding with heated makeup air, with fabric filter (SCC 3-05-089-47)	0.022 ^g	9.3 ^h
Classifying, with fabric filter ^j (SCC 3-05-089-50)	0.00077	NA
Pellet drying, with fabric filter ^k (SCC 3-05-089-55)	0.032	ND
Pneumatic conveyor venting, with fabric filter ^m (SCC 3-05-089-58)	0.0018	NA
Packaging, with fabric filter ⁿ (SCC 3-05-089-88)	0.0090	NA
Crushed talc storage bin loading, with fabric filter ^p (SCC 3-05-089-14)	0.0036	NA
Ground talc storage bin loading, with fabric filter ^q (SCC 3-05-089-49)	0.0016	NA
Final product storage bin loading, with fabric filter ^p (SCC 3-05-089-85)	0.0035	NA

^a Units are lb/1,000 lb of production unless noted. One lb/1,000 lb is equal to 1 kg/Mg. SCC = Source Classification Code. NA = not applicable. ND = no data.

^b Total PM includes the PM collected in the front half and the inorganic PM caught in the back half (impingers) of a Method 5 sampling train.

^c Reference 15. Filterable PM fraction is 60%, and condensible inorganic fraction is 40%.

^d References 10,13,15.

^e Reference 14.

^f References 10,13. For crushed talc ore.

^g References 11,13.

^h References 10-11. For roller mill using heated makeup air. EMISSION FACTOR RATING: E.

^j Reference 13. For ground talc.

^k Reference 13. Filterable PM fraction is 56%, and condensible inorganic fraction is 44%. EMISSION FACTOR RATING: E.

^m Reference 13. For final product. Units are lb/1,000 lb of material conveyed.

ⁿ Reference 10,13.

^p Reference 13. Units are lb/1,000 lb of material loaded into storage bin.

^q Reference 12. Units are lb/1,000 lb of material loaded into storage bin.

Table 11.26-2. SUMMARY OF PARTICLE SIZE DISTRIBUTIONS FOR
TALC PROCESSING^a

Process	Diameter, μm	Cumulative Percent Less Than Diameter
Primary crushing (SCC 3-05-089-11)	55.4	91.3
	34.9	78.2
	22.0	56.7
	17.4	47.2
	11.0	38.8
	6.9	21.4
	3.0	3.0
	2.0	0.94
	1.0	0.11
Grinding (SCC 3-05-089-45)	29.0	100.0
	18.8	99.7
	14.9	99.4
	11.9	97.1
	9.4	80.8
	7.5	43.3
	4.7	7.5
	3.0	2.1
	1.9	0.28
Storage, bagging, air classification (SCC 3-05-089-85,-88,-50)	1.0	0.04
	43.9	99.9
	27.7	97.9
	17.4	86.6
	13.8	73.2
	11.0	56.8
	6.9	24.5
	4.4	7.4
	3.0	3.1
	2.0	0.92
	1.0	0.10

^a Reference 5. Optical procedures used to determine particle size distribution, rather than inertial separators. Data are suspect. SCC = Source Classification Code.

Table 11.19.2-1 (Metric Units). EMISSION FACTORS FOR CRUSHED STONE PROCESSING OPERATIONS (kg/Mg)^a

Source ^b	Total Particulate Matter ^{r,s}	EMISSION FACTOR RATING	Total PM-10	EMISSION FACTOR RATING	Total PM-2.5	EMISSION FACTOR RATING
Primary Crushing (SCC 3-05-020-01)	ND		ND ⁿ		ND ⁿ	
Primary Crushing (controlled) (SCC 3-05-020-01)	ND		ND ⁿ		ND ⁿ	
Secondary Crushing (SCC 3-05-020-02)	ND		ND ⁿ		ND ⁿ	
Secondary Crushing (controlled) (SCC 3-05-020-02)	ND		ND ⁿ		ND ⁿ	
Tertiary Crushing (SCC 3-050030-03)	0.0027 ^d	E	0.0012 ^o	C	ND ⁿ	
Tertiary Crushing (controlled) (SCC 3-05-020-03)	0.0006 ^d	E	0.00027 ^p	C	0.00005 ^q	E
Fines Crushing (SCC 3-05-020-05)	0.0195 ^e	E	0.0075 ^e	E	ND	
Fines Crushing (controlled) (SCC 3-05-020-05)	0.0015 ^f	E	0.0006 ^f	E	0.000035 ^q	E
Screening (SCC 3-05-020-02, 03)	0.0125 ^c	E	0.0043 ^l	C	ND	
Screening (controlled) (SCC 3-05-020-02, 03)	0.0011 ^d	E	0.00037 ^m	C	0.000025 ^q	E
Fines Screening (SCC 3-05-020-21)	0.15 ^g	E	0.036 ^g	E	ND	
Fines Screening (controlled) (SCC 3-05-020-21)	0.0018 ^g	E	0.0011 ^g	E	ND	
Conveyor Transfer Point (SCC 3-05-020-06)	0.0015 ^h	E	0.00055 ^h	D	ND	
Conveyor Transfer Point (controlled) (SCC 3-05-020-06)	0.00007 ⁱ	E	2.3 x 10 ^{-5j}	D	6.5 x 10 ^{-6q}	E
Wet Drilling - Unfragmented Stone (SCC 3-05-020-10)	ND		4.0 x 10 ^{-5j}	E	ND	
Truck Unloading - Fragmented Stone (SCC 3-05-020-31)	ND		8.0 x 10 ^{-6j}	E	ND	
Truck Loading - Conveyor, crushed stone (SCC 3-05-020-32)	ND		5.0 x 10 ^{-5k}	E	ND	

a. Emission factors represent uncontrolled emissions unless noted. Emission factors in kg/Mg of material throughput. SCC = Source Classification Code. ND = No data.

b. Controlled sources (with wet suppression) are those that are part of the processing plant that employs current wet suppression technology similar to the study group. The moisture content of the study group without wet suppression systems operating (uncontrolled) ranged from 0.21 to 1.3 percent, and the same facilities operating wet suppression systems (controlled) ranged from 0.55 to 2.88 percent. Due to carry over of the small amount of moisture required, it has been shown that each source, with the exception of crushers, does not need to employ direct water sprays. Although the moisture content was the only variable measured, other process features may have as much influence on emissions from a given source. Visual observations from each source under normal operating conditions are probably the best indicator of which emission factor is most appropriate. Plants that employ substandard control measures as indicated by visual observations should use the uncontrolled factor with appropriate control efficiency that best reflects the effectiveness of the controls employed.

c. References 1, 3, 7, and 8

Table 11.19.2-2 (English Units). EMISSION FACTORS FOR CRUSHED STONE PROCESSING OPERATIONS (lb/Ton)^a

Source ^b	Total Particulate Matter ^{r,s}	EMISSION FACTOR RATING	Total PM-10	EMISSION FACTOR RATING	Total PM-2.5	EMISSION FACTOR RATING
Primary Crushing (SCC 3-05-020-01)	ND		ND ⁿ		ND ⁿ	
Primary Crushing (controlled) (SCC 3-05-020-01)	ND		ND ⁿ		ND ⁿ	
Secondary Crushing (SCC 3-05-020-02)	ND		ND ⁿ		ND ⁿ	
Secondary Crushing (controlled) (SCC 3-05-020-02)	ND		ND ⁿ		ND ⁿ	
Tertiary Crushing (SCC 3-050030-03)	0.0054 ^d	E	0.0024 ^o	C	ND ⁿ	
Tertiary Crushing (controlled) (SCC 3-05-020-03)	0.0012 ^d	E	0.00054 ^p	C	0.00010 ^q	E
Fines Crushing (SCC 3-05-020-05)	0.0390 ^e	E	0.0150 ^e	E	ND	
Fines Crushing (controlled) (SCC 3-05-020-05)	0.0030 ^f	E	0.0012 ^f	E	0.000070 ^q	E
Screening (SCC 3-05-020-02, 03)	0.025 ^c	E	0.0087 ^l	C	ND	
Screening (controlled) (SCC 3-05-020-02, 03)	0.0022 ^d	E	0.00074 ^m	C	0.000050 ^q	E
Fines Screening (SCC 3-05-020-21)	0.30 ^g	E	0.072 ^g	E	ND	
Fines Screening (controlled) (SCC 3-05-020-21)	0.0036 ^g	E	0.0022 ^g	E	ND	
Conveyor Transfer Point (SCC 3-05-020-06)	0.0030 ^h	E	0.00110 ^h	D	ND	
Conveyor Transfer Point (controlled) (SCC 3-05-020-06)	0.00014 ⁱ	E	4.6 x 10 ^{-5j}	D	1.3 x 10 ^{-5q}	E
Wet Drilling - Unfragmented Stone (SCC 3-05-020-10)	ND		8.0 x 10 ^{-5j}	E	ND	
Truck Unloading -Fragmented Stone (SCC 3-05-020-31)	ND		1.6 x 10 ^{-5j}	E	ND	
Truck Loading - Conveyor, crushed stone (SCC 3-05-020-32)	ND		0.00010 ^k	E	ND	

a. Emission factors represent uncontrolled emissions unless noted. Emission factors in lb/Ton of material of throughput. SCC = Source Classification Code. ND = No data.

b. Controlled sources (with wet suppression) are those that are part of the processing plant that employs current wet suppression technology similar to the study group. The moisture content of the study group without wet suppression systems operating (uncontrolled) ranged from 0.21 to 1.3 percent, and the same facilities operating wet suppression systems (controlled) ranged from 0.55 to 2.88 percent. Due to carry over of the small amount of moisture required, it has been shown that each source, with the exception of crushers, does not need to employ direct water sprays. Although the moisture content was the only variable measured, other process features may have as much influence on emissions from a given source. Visual observations from each source under normal operating conditions are probably the best indicator of which emission factor is most appropriate. Plants that employ substandard control measures as indicated by visual observations should use the uncontrolled factor with an appropriate control efficiency that best reflects the effectiveness of the controls employed.

c. References 1, 3, 7, and 8

d. References 3, 7, and 8

Table 11.19.2-3 (Metric Units). EMISSION FACTORS FOR PULVERIZED MINERAL PROCESSING OPERATIONS ^a

Source ^b	Total Particulate Matter	EMISSION FACTOR RATING	Total PM-10	EMISSION FACTOR RATING	Total PM-2.5	EMISSION FACTOR RATING
Grinding (Dry) with Fabric Filter Control (SCC 3-05-038-11)	0.0202	D	0.0169	B	0.0060	B
Classifiers (Dry) with Fabric Filter Control (SCC 3-05-038-12)	0.0112	E	0.0052	E	0.0020	E
Flash Drying with Fabric Filter Control (SCC 3-05-038-35)	0.0134	C	0.0073	C	0.0042	C
Product Storage with Fabric Filter Control (SCC 3-05-38-13)	0.0055	E	0.0008	E	0.0003	E

a. Emission factors represent controlled emissions unless noted. Emission factors are in kg/Mg of material throughput.

b. Data from references 16 through 23

Table 11.19.2-4 (English Units). EMISSION FACTORS FOR PULVERIZED MINERAL PROCESSING OPERATIONS ^a

Source ^b	Total Particulate Matter	EMISSION FACTOR RATING	Total PM-10	EMISSION FACTOR RATING	Total PM-2.5	EMISSION FACTOR RATING
Grinding (Dry) with Fabric Filter Control (SCC 3-05-038-11)	0.0404	D	0.0339	B	0.0121	B
Classifiers (Dry) with Fabric Filter Control (SCC 3-05-038-12)	0.0225	E	0.0104	E	0.0041	E
Flash Drying with Fabric Filter Control (SCC 3-05-038-35)	0.0268	C	0.0146	C	0.0083	C
Product Storage with Fabric Filter Control (SCC 3-05-038-13)	0.0099	E	0.0016	E	0.0006	E

a. Emission factors represent controlled emissions unless noted. Emission factors are in lb/Ton of material throughput.

b. Data from references 16 through 23

Table 1.4-1. EMISSION FACTORS FOR NITROGEN OXIDES (NO_x) AND CARBON MONOXIDE (CO)
FROM NATURAL GAS COMBUSTION^a

Combustor Type (MMBtu/hr Heat Input) [SCC]	NO _x ^b		CO	
	Emission Factor (lb/10 ⁶ scf)	Emission Factor Rating	Emission Factor (lb/10 ⁶ scf)	Emission Factor Rating
Large Wall-Fired Boilers (>100) [1-01-006-01, 1-02-006-01, 1-03-006-01]				
Uncontrolled (Pre-NSPS) ^c	280	A	84	B
Uncontrolled (Post-NSPS) ^c	190	A	84	B
Controlled - Low NO _x burners	140	A	84	B
Controlled - Flue gas recirculation	100	D	84	B
Small Boilers (<100) [1-01-006-02, 1-02-006-02, 1-03-006-02, 1-03-006-03]				
Uncontrolled	100	B	84	B
Controlled - Low NO _x burners	50	D	84	B
Controlled - Low NO _x burners/Flue gas recirculation	32	C	84	B
Tangential-Fired Boilers (All Sizes) [1-01-006-04]				
Uncontrolled	170	A	24	C
Controlled - Flue gas recirculation	76	D	98	D
Residential Furnaces (<0.3) [No SCC]				
Uncontrolled	94	B	40	B

^a Reference 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. To convert from lb/10⁶ scf to kg/10⁶ m³, multiply by 16. Emission factors are based on an average natural gas higher heating value of 1,020 Btu/scf. To convert from lb/10⁶ scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. SCC = Source Classification Code. ND = no data. NA = not applicable.

^b Expressed as NO₂. For large and small wall fired boilers with SNCR control, apply a 24 percent reduction to the appropriate NO_x emission factor. For tangential-fired boilers with SNCR control, apply a 13 percent reduction to the appropriate NO_x emission factor.

^c NSPS=New Source Performance Standard as defined in 40 CFR 60 Subparts D and Db. Post-NSPS units are boilers with greater than 250 MMBtu/hr of heat input that commenced construction modification, or reconstruction after August 17, 1971, and units with heat input capacities between 100 and 250 MMBtu/hr that commenced construction modification, or reconstruction after June 19, 1984.

TABLE 1.4-2. EMISSION FACTORS FOR CRITERIA POLLUTANTS AND GREENHOUSE GASES FROM NATURAL GAS COMBUSTION^a

Pollutant	Emission Factor (lb/10 ⁶ scf)	Emission Factor Rating
CO ₂ ^b	120,000	A
Lead	0.0005	D
N ₂ O (Uncontrolled)	2.2	E
N ₂ O (Controlled-low-NO _x burner)	0.64	E
PM (Total) ^c	7.6	D
PM (Condensable) ^c	5.7	D
PM (Filterable) ^c	1.9	B
SO ₂ ^d	0.6	A
TOC	11	B
Methane	2.3	B
VOC	5.5	C

^a Reference 11. Units are in pounds of pollutant per million standard cubic feet of natural gas fired. Data are for all natural gas combustion sources. To convert from lb/10⁶ scf to kg/10⁶ m³, multiply by 16. To convert from lb/10⁶ scf to lb/MMBtu, divide by 1,020. The emission factors in this table may be converted to other natural gas heating values by multiplying the given emission factor by the ratio of the specified heating value to this average heating value. TOC = Total Organic Compounds.

VOC = Volatile Organic Compounds.

^b Based on approximately 100% conversion of fuel carbon to CO₂. CO₂[lb/10⁶ scf] = (3.67) (CON) (C)(D), where CON = fractional conversion of fuel carbon to CO₂, C = carbon content of fuel by weight (0.76), and D = density of fuel, 4.2x10⁴ lb/10⁶ scf.

^c All PM (total, condensable, and filterable) is assumed to be less than 1.0 micrometer in diameter. Therefore, the PM emission factors presented here may be used to estimate PM₁₀, PM_{2.5} or PM₁ emissions. Total PM is the sum of the filterable PM and condensable PM. Condensable PM is the particulate matter collected using EPA Method 202 (or equivalent). Filterable PM is the particulate matter collected on, or prior to, the filter of an EPA Method 5 (or equivalent) sampling train.

^d Based on 100% conversion of fuel sulfur to SO₂.

Assumes sulfur content is natural gas of 2,000 grains/10⁶ scf. The SO₂ emission factor in this table can be converted to other natural gas sulfur contents by multiplying the SO₂ emission factor by the ratio of the site-specific sulfur content (grains/10⁶ scf) to 2,000 grains/10⁶ scf.

TABLE 1.4-3. EMISSION FACTORS FOR SPECIATED ORGANIC COMPOUNDS FROM
NATURAL GAS COMBUSTION^a

CAS No.	Pollutant	Emission Factor (lb/10 ⁶ scf)	Emission Factor Rating
91-57-6	2-Methylnaphthalene ^{b, c}	2.4E-05	D
56-49-5	3-Methylcholanthrene ^{b, c}	<1.8E-06	E
	7,12-Dimethylbenz(a)anthracene ^{b, c}	<1.6E-05	E
83-32-9	Acenaphthene ^{b, c}	<1.8E-06	E
203-96-8	Acenaphthylene ^{b, c}	<1.8E-06	E
120-12-7	Anthracene ^{b, c}	<2.4E-06	E
56-55-3	Benz(a)anthracene ^{b, c}	<1.8E-06	E
71-43-2	Benzene ^b	2.1E-03	B
50-32-8	Benzo(a)pyrene ^{b, c}	<1.2E-06	E
205-99-2	Benzo(b)fluoranthene ^{b, c}	<1.8E-06	E
191-24-2	Benzo(g,h,i)perylene ^{b, c}	<1.2E-06	E
207-08-9	Benzo(k)fluoranthene ^{b, c}	<1.8E-06	E
106-97-8	Butane	2.1E+00	E
218-01-9	Chrysene ^{b, c}	<1.8E-06	E
53-70-3	Dibenzo(a,h)anthracene ^{b, c}	<1.2E-06	E
25321-22-6	Dichlorobenzene ^b	1.2E-03	E
74-84-0	Ethane	3.1E+00	E
206-44-0	Fluoranthene ^{b, c}	3.0E-06	E
86-73-7	Fluorene ^{b, c}	2.8E-06	E
50-00-0	Formaldehyde ^b	7.5E-02	B
110-54-3	Hexane ^b	1.8E+00	E
193-39-5	Indeno(1,2,3-cd)pyrene ^{b, c}	<1.8E-06	E
91-20-3	Naphthalene ^b	6.1E-04	E
109-66-0	Pentane	2.6E+00	E
85-01-8	Phenanthrene ^{b, c}	1.7E-05	D
74-98-6	Propane	1.6E+00	E

Particle Distribution Analysis Results

Marcelle van Reenen

From: Thomas, Mike (Food and Ingredients) [Mike.Thomas@conagrafoods.com]
Sent: Thursday, October 30, 2008 7:27 AM
To: pat.nelson@hazair.com, Marcelle van Reenen
Cc: Balster, Marian (Food and Ingredients)
Subject: FW: Granulations

Follow Up Flag: Follow up
Flag Status: Flagged

Attached are our sieve analysis for both 100 and 230 mesh screens. I believe the blue numbers are the ones you need % thru the screen.

Mike

From: Castrejon, Viken (Food and Ingredients)
Sent: Wednesday, October 29, 2008 12:43 PM
To: Thomas, Mike (Food and Ingredients)
Subject: Granulations

Mike,

Your results below

60 mesh products (40% of volume)

+ 100 mesh screen (on) @ 62.1%

-100 mesh screen (thru) @ 37.9%

+230 mesh screen (on) @ 98.2%

-230 mesh screen (thru) @ 1.8%

34 mesh products (60% of volume)

+100 mesh screen (on) @ 83.7%

-100 mesh screen (thru) @ 16.3%

+230 mesh screen (on) @ 98.6%

-230 mesh screen (thru) @ 1.6%

Thanks,
Viken

Baghouse Filter Control Efficiencies for Camcorp/CHUBB Baghouse



Phone: 913-831-0740
Fax: 913-831-9271
E-Mail: info@camcorpinc.com
Web Site: www.camcorpinc.com
8224 Nieman Road
Lenexa, KS 66214

DUST COLLECTOR EFFICIENCY STATEMENT
(BAGHOUSE FILTER)

DATE:	5/9/06
Company	ConAgra Foods
Attn:	Mike Thomas
Address	1650 W. Amador St.
City, State	Las Cruces, NM 88005
P.O. Number/Project:	CC2825-T
Camcorp Model:	20TR12x320
Application:	Nuisance dust collection
Product:	Chili powder
Air Volume:	24,175 CFM
Ratio:	3.93 to 1
Filter Media:	16oz. Polyester bags
Efficiency:	Maximum particle emissions will not exceed 0.02 GRS/SCF of exhaust gas through the baghouse at 99.9% efficiency above 2 Micron Particles with less than 40 grains/SCF with a sufficient dust cake on bag.

Baghouse Filter Control Efficiencies for the MikroPul and Farr Baghouses



Phone: 913-831-0740
Fax: 913-831-9271
E-Mail: info@camcorpinc.com
Web Site: www.camcorpinc.com
9732 Pflumm Road
Lenexa, KS 66215

DUST COLLECTOR EFFICIENCY STATEMENT
(CARTRIDGE FILTER)

DATE: 5/9/06

Company: ConAgra Foods
Attn: Mike Thomas
Address: 1650 W. Amador St.
City, State: Las Cruces, NM 88005

Project #: CC2825-T

Camcorp Model: 4SFBH45x16 Bin Vent
Application: Dust Collection

Product: Chili Powder
Air Volume: 1,357 ACFM
Ratio: 3 to 1
Filter Media: 100% Spun Bond Polyester Cartridge
Efficiency: 99.9% Efficient on particulate above .5 micron with less than 30 grains/SCF.

CamCorp guarantees that the "Maximum Particulate Emissions to Atmosphere" will not exceed: 00.02 GRS/SCF of exhaust gas.

Baghouse Filter Control Efficiencies for the Kice Baghouses



Engineering and Manufacturing

Skilled Air for Industry

KICE INDUSTRIES, INC.

WICHITA, KANSAS U.S.A.

11/12/08

*Marcelle van Reenen
929 Quincy Street NE
Albuquerque, NM 87110*

Dear Marcelle:

This letter is in reply to your inquiry about filtration efficiency of Kice baghouse filters.

Quite frankly, Kice Industries, like most other OEM's, purchase their filter bags on the open market. Kice presently purchases 16 oz. "singed" polyester filter bags with a 2.5 denier strand. The dust collection rating for this weight and denier of media is 99.9% on 5 micron, 99.99% on 10 micron, and 100% for 15+ micron grain dust particles.

The following is a list of particulate emission rates from Kice baghouse filters in similar applications. They have been obtained through standard isokinetic testing of similar Kice filters in the field with standard polyester felt bags. Particulate concentrations in the filter exhaust air have been determined as follows:

- 1) Grain elevator in Alabama - 0.001 to 0.004 grain per actual cubic foot of exhaust.
- 2) Flour mill in Utah - 0.0007 to 0.0015 grain per dry standard cubic foot of exhaust.
- 3) Grain processing plant in Iowa - negligible emissions, less than 0.0046 grain per standard cubic foot of exhaust.
- 4) Grain elevator in Oklahoma - 0.0024 grain per dry standard cubic foot of filter exhaust, average of three tests.
- 5) Barge receiving in Alabama - 0.0026 grain per DSCF, average of three tests.

Edited test results with reference numbers are available. We trust this information satisfies your inquiry.

Very truly yours,

Jeff Kice
Kice Industries, Inc.

Corporate Headquarters and Plant
5500 N. Mill Heights Drive
Wichita, KS. 67219

Phone: (316) 744-7151 Fax: (316) 744-7355

e-mail: sales@kice.com

web site: www.kice.com

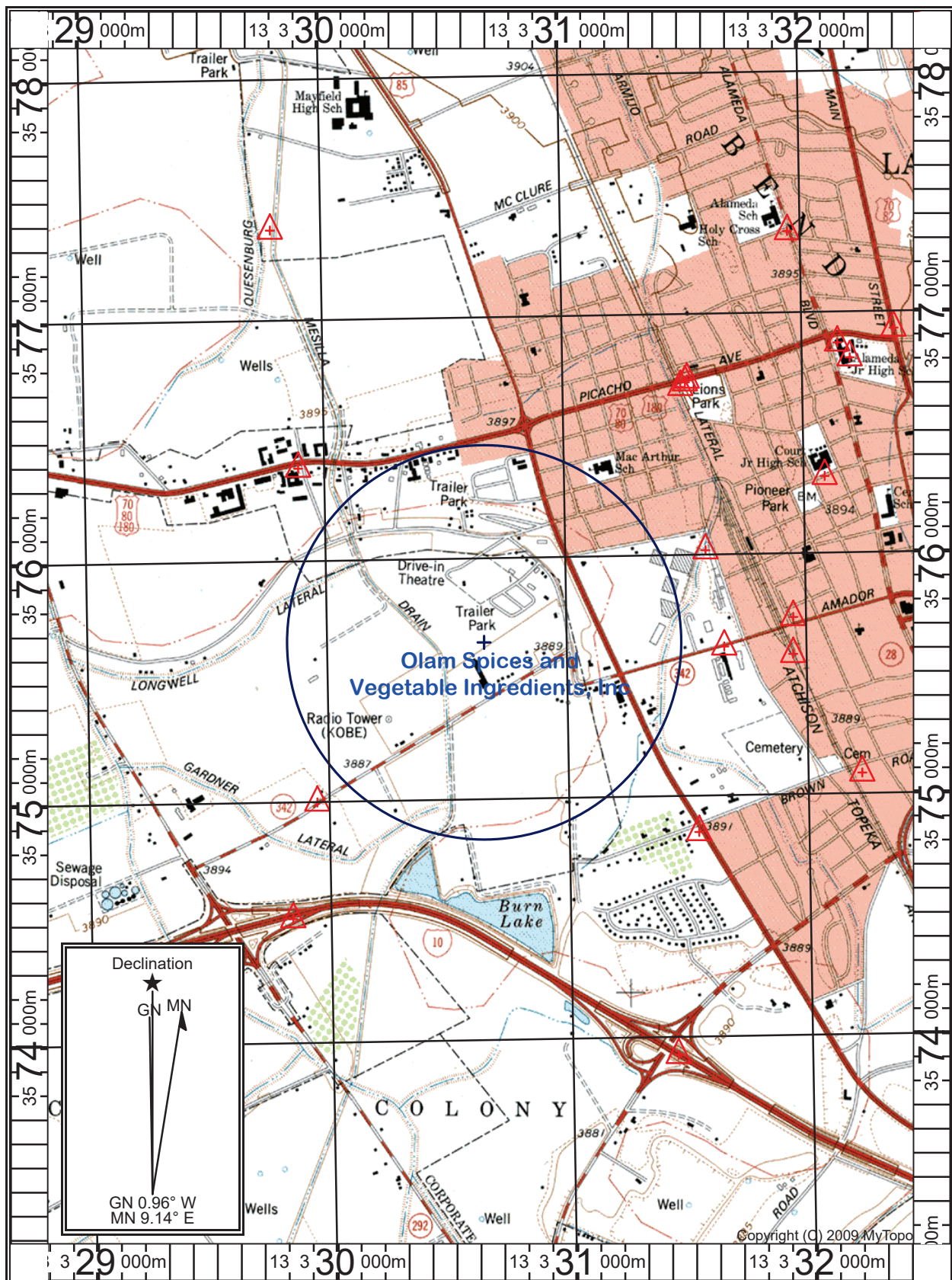
Section 8

Map(s)

A map such as a 7.5 minute topographic quadrangle showing the exact location of the source. The map shall also include the following:

The UTM or Longitudinal coordinate system on both axes	An indicator showing which direction is north
A minimum radius around the plant of 0.8km (0.5 miles)	Access and haul roads
Topographic features of the area	Facility property boundaries
The name of the map	The area which will be restricted to public access
A graphical scale	

The map of the OLAM facility is attached as follows:



Map Name: LAS CRUCES (NM)
 Print Date: 08/27/24

Scale: 1 inch = 2,000 ft.
 Map Center: 13 0330639 E 3575635 N

Horizontal Datum: WGS84

Section 9

Proof of Public Notice

(for NSR applications submitting under 20.2.72 or 20.2.74 NMAC)

(This proof is required by: 20.2.72.203.A.14 NMAC “Documentary Proof of applicant’s public notice”)

☐ **I have read the AQB “Guidelines for Public Notification for Air Quality Permit Applications”**

This document provides detailed instructions about public notice requirements for various permitting actions. It also provides public notice examples and certification forms. Material mistakes in the public notice will require a re-notice before issuance of the permit.

Unless otherwise allowed elsewhere in this document, the following items document proof of the applicant’s Public Notification. Please include this page in your proof of public notice submittal with checkmarks indicating which documents are being submitted with the application.

New Permit and **Significant Permit Revision** public notices must include all items in this list.

Technical Revision public notices require only items 1, 5, 9, and 10.

Per the Guidelines for Public Notification document mentioned above, include:

1. ☒ A copy of the certified letter receipts with post marks (20.2.72.203.B NMAC)
 2. ☒ A list of the places where the public notice has been posted in at least four publicly accessible and conspicuous places, including the proposed or existing facility entrance. (e.g: post office, library, grocery, etc.)
 3. ☒ A copy of the property tax record (20.2.72.203.B NMAC).
 4. ☒ A sample of the letters sent to the owners of record.
 5. ☒ A sample of the letters sent to counties, municipalities, and Indian tribes.
 6. ☒ A sample of the public notice posted and a verification of the local postings.
 7. ☒ A table of the noticed citizens, counties, municipalities and tribes and to whom the notices were sent in each group.
 8. ☒ A copy of the public service announcement (PSA) sent to a local radio station and documentary proof of submittal.
 9. ☒ A copy of the classified or legal ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
 10. ☒ A copy of the display ad including the page header (date and newspaper title) or its affidavit of publication stating the ad date, and a copy of the ad. When appropriate, this ad shall be printed in both English and Spanish.
 11. ☒ A map with a graphic scale showing the facility boundary and the surrounding area in which owners of record were notified by mail. This is necessary for verification that the correct facility boundary was used in determining distance for notifying land owners of record.
-

The above Public Notice documents are attached as follows:

7014 2870 0001 4722 4175

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

\$0.00⁹
US POSTAGE
10/11/2024
062S12395454
87113
000031725



Sent To **Yes Valley Verde LLC**
Street & Apt. No.,
or PO Box No. **5050 S. Syracuse St., Ste 1200**
City, State, ZIP+4 **Denver, CO 80273**

PS Form 3800, July 2014

See Reverse for Instructions

7014 2870 0001 4722 4205

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

\$0.00⁹
US POSTAGE
10/11/2024
062S12395454
87113
000031726



Sent To **A and B Land Investment LLC**
Street & Apt. No.,
or PO Box No. **PO Box 1779**
City, State, ZIP+4 **Las Cruces, NM 88004**

PS Form 3800, July 2014

See Reverse for Instructions

7014 2870 0001 4722 4243

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

\$0.00⁹
US POSTAGE
10/11/2024
062S12395454
87113
000031728



Sent To **Doña Ana County - County Manager's Office**
Street & Apt. No.,
or PO Box No. **845 N. Motel Blvd.**
City, State, ZIP+4 **Las Cruces, NM 88007**

PS Form 3800, July 2014

See Reverse for Instructions

7014 2870 0001 4722 4212

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

\$0.00⁹
US POSTAGE
10/11/2024
062S12395454
87113
000031724



Sent To **Sagebrush LLC**
Street & Apt. No.,
or PO Box No. **PO Box 194**
City, State, ZIP+4 **Fairacres, NM 88033**

PS Form 3800, July 2014

See Reverse for Instructions

7014 2870 0001 4722 4182

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

\$0.00⁹
US POSTAGE
10/11/2024
062S12395454
87113
000031714



Sent To **Amador Holding + Leasing Co**
Street & Apt. No.,
or PO Box No. **1530 W. Amador Ave**
City, State, ZIP+4 **Las Cruces, NM 88005-4007**

PS Form 3800, July 2014

See Reverse for Instructions

7014 2870 0001 4722 4199

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

\$0.00⁹
US POSTAGE
10/11/2024
062S12395454
87113
000031723



Sent To **1510 Amador LLC**
Street & Apt. No.,
or PO Box No. **2000 E Lohman, Suite C**
City, State, ZIP+4 **Las Cruces, NM 88001**

PS Form 3800, July 2014

See Reverse for Instructions

7014 2870 0001 4722 4236

**U.S. Postal Service™
CERTIFIED MAIL® RECEIPT**
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

\$0.00⁹
US POSTAGE
10/11/2024
062512395454
87113
000031729



Sent To **Town of Mesilla**
Street & Apt. No.,
or PO Box No. **2231 Avenida de Mesilla PO Box 10**
City, State, ZIP+4 **Mesilla, NM 88046**

PS Form 3800, July 2014

See Reverse for Instructions

7014 2870 0001 4722 4229

**U.S. Postal Service™
CERTIFIED MAIL® RECEIPT**
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

\$0.00⁹
US POSTAGE
10/11/2024
062512395454
87113
000031727



Sent To **Las Cruces City Manager**
Street & Apt. No.,
or PO Box No. **700 N Main St.**
City, State, ZIP+4 **Las Cruces, NM 88001**

PS Form 3800, July 2014

See Reverse for Instructions

List of Posted Notice Locations

1. OLAM Spices and Vegetables Ingredients Facility Entrance
2. Eagle Grocery, 108 E Corpening St, La Mesa, NM 88004
3. Thomas Branigan Library, 200 E Picacho Ave, Las Cruces, NM 88001
4. United States Postal Service, 16140 S Highway 28, La Mesa, NM 88044

- [Account Search](#)
- [View Created Report\(s\)](#)
- [Help?](#)
- [Logout Public](#)

Account: P0001065 *Mill Levy does not include Special District Rates such as: Lower Rio Grande Flood Levy, Hueco Levy, Mclead Watershed Levy, Caballo Soil and Water Conservation Levy, and La Union Watershed Levy.

1 of 5 Results [Next->](#)

Location	Owner Information	Assessment History		
Situs Address 1650 W AMADOR AVE	Owner Name OLAM WEST COAST INC	Actual (2024)	\$5,586,536	
Tax Area 2IN_NR - 2IN_NR	In Care Of Name NOWLIN DAVID	Primary Taxable	\$1,862,179	
Parcel Number 4-006-135-116-443	Owner Address 205 E RIVER PARK CIR STE 310	Tax Area: 2IN_NR Mill		
Legal Summary S: 13 T: 23S R: 1E	FRESNO, CA 93720	Levy: 34.102000		
Neighborhood V23 - VALLEY-PICHO		Type	Actual	Assessed
		Personal Property	\$5,586,536	\$1,862,179

Transfers

No Transfer Documents	
-----------------------	--

Images	
• GIS	

Tax Year	Taxes	
	*2024	\$63,504.04
	2023	\$35,845.80
* Estimated		



October 11, 2024

CERTIFIED MAIL 7014 2870 0001 4722 4243

RETURN RECEIPT REQUESTED (certified mail is required, **return receipt is optional**)

Dear **County Official**,

OLAM West Coast, Inc. announces its application to the New Mexico Environment Department for an air quality permit for the **modification** of its **OLAM Spices and Vegetables Ingredients** facility. The expected date of application submittal to the Air Quality Bureau is **October 18, 2024**.

The exact location for the proposed facility known as **Olam Spices and Vegetable Ingredients, Inc.** is at **1650 W. Amador Ave, Las Cruces, NM 88005**. The approximate location of this facility is **0.33 miles West of the intersection of W Amador Ave and S Valley Dr** in **Doña Ana** county.

The proposed **modification** consists of the removal of a cryo mill, four seed dryers, and three boilers. The instillation of a new boiler as well as the replacement of two boilers, a finish mill, and a steam sterilizer.

The estimated maximum quantities of any regulated air contaminant will be as follows in pound per hour (pph) and tons per year (tpy) and may change slightly during the course of the Department's review:

Pollutant:	Pounds per hour	Tons per year
PM ₁₀	0.98	4.27
PM _{2.5}	0.64	2.80
Sulfur Dioxide (SO ₂)	0.40	1.74
Nitrogen Oxides (NO _x)	6.94	30.38
Carbon Monoxide (CO)	5.83	25.52
Volatile Organic Compounds (VOC)	0.38	1.67
Total sum of all Hazardous Air Pollutants (HAPs)	0.13	0.57
Green House Gas Emissions as Total CO ₂ e	n/a	n/a

The standard and maximum operating schedules of the facility will be 24 hours, 7 days a week and a maximum of 52 weeks per year

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

Please refer to the company name and facility name, or send a copy of this notice along with your comments, since the Department may have not yet received the permit application. Please include a legible return mailing address with your comments. Once the Department has performed a preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

Atención

Este es un aviso de la oficina de Calidad del Aire del Departamento del Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usted desea información en español, por favor comuníquese con esa oficina al teléfono 505-629-3395.

Sincerely,

OLAM West Coast, Inc.,
205 E. River Park Circle, Suite 310
Fresno, CA 93720.

Notice of Non-Discrimination

NMED does not discriminate on the basis of race, color, national origin, disability, age or sex in the administration of its programs or activities, as required by applicable laws and regulations. NMED is responsible for coordination of compliance efforts and receipt of inquiries concerning non-discrimination requirements implemented by 40 C.F.R. Part 7, including Title VI of the Civil Rights Act of 1964, as amended; Section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, and Section 13 of the Federal Water Pollution Control Act Amendments of 1972. If you have any questions about this notice or any of NMED's non-discrimination programs, policies or procedures, or if you believe that you have been discriminated against with respect to a NMED program or activity, you may contact: Non-Discrimination Coordinator, NMED, 1190 St. Francis Dr., Suite N4050, P.O. Box 5469, Santa Fe, NM 87502, (505) 827-2855, nd.coordinator@env.nm.gov. You may also visit our website at <https://www.env.nm.gov/non-employee-discrimination-complaint-page/> to learn how and where to file a complaint of discrimination.

NOTICE

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PM _{2.5}	0.64	2.80
Sulfur Dioxide (SO ₂)	0.40	1.74
Nitrogen Oxides (NO _x)	6.94	30.38
Carbon Monoxide (CO)	5.83	25.52
Volatile Organic Compounds (VOC)	0.38	1.67
Total sum of all Hazardous Air Pollutants (HAPs)	0.13	0.57
Green House Gas Emissions as Total CO ₂ e	n/a	n/a

The standard and maximum operating schedules of the facility will be 24 hours, 7 days a week and a maximum of 52 weeks per year

The owner and/or operator of the Facility is: **OLAM West Coast, Inc., 205 E. River Park Circle, Suite 310, Fresno, CA 93720**.

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager; New Mexico Environment Department; Air Quality Bureau; 525 Camino de los Marquez, Suite 1; Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

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General Posting of Notices – Certification

I, Christopher Granados, the undersigned, certify that on {10/18/24}, posted a true and correct copy of the attached Public Notice in the following publicly accessible and conspicuous places in **Las Cruces** of **DOÑA ANA** County, State of New Mexico on the following dates:

1. Facility entrance {10/14/24}
2. {Eagle Grocery}{10/14/24}
3. {Thomas Branigan Library}{10/14/24}
4. {United States Postal Service}{10/14/24}

Signed this 18 day of October, 2024,


Signature

10/18/24
Date

Christopher Granados
Printed Name

ETS Supervisor
Title {APPLICANT OR RELATIONSHIP TO APPLICANT}

EAGLE GROCERY



NOTICE

OLAM West Coast, Inc. announces its application to the New Mexico Environment Department for an air quality permit for the modification of its OLAM Spices and Vegetables Ingredients facility. The expected date of application submittal to the Air Quality Bureau is October 18, 2024.

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Volatile Organic Compounds (VOC)	0.38	1.67
Total sum of all Hazardous Air Pollutants (HAPs)	0.13	0.57
Green House Gas Emissions as Total CO ₂ e	n/a	n/a

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The owner and/or operator of the facility is: OLAM West Coast, Inc., 205 E. River Park Circle, Suite 310, Fresno, CA 93720.

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager, New Mexico Environment Department, Air Quality Bureau, 525 Camino de los Marquez, Suite 1, Santa Fe, New Mexico, 87505-1816. Other comments and questions may be submitted verbally (505) 476-4300; 1 800 224-7009.

With your comments, please refer to the company name and facility name, or send a copy of this notice along with your comments. This information is necessary since the Department may have not yet received the permit application. Please include a legible return mailing address. Once the Department has completed its preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

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OLAM SPICES AND VEGETABLE INGREDIENTS FACILITY ENTRANCE

NOTICE

OLAM West Coast, Inc. announces its application to the New Mexico Environment Department for an air quality permit for the modification of its OLAM Spices and Vegetables Ingredients facility. The expected date of application submission to the Air Quality Bureau is October 18, 2024.

The exact location for the proposed facility known as Olam Spices and Vegetable Ingredients, Inc. is at 1650 W. Amador Ave., Las Cruces, NM 88005. The approximate location of this facility is 0.33 miles West of the intersection of W. Amador Ave. and S. Valley Dr. in Dona Ana County.

The proposed modification consists of the removal of a rice mill, four seed dryers, and three boilers. The installation of a new boiler as well as the replacement of two boilers, a finish mill, and a steam sterilizer. The estimated maximum quantities of any regulated air contaminant will be as follows in pound per hour (pph) and tons per year (tpy) and may change slightly during the course of the Department's review.

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PM ₁₀	0.98	4.27
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Sulfur Dioxide (SO ₂)	0.40	1.74
Nitrogen Oxides (NO _x)	6.94	30.38
Carbon Monoxide (CO)	5.83	25.52
Volatile Organic Compounds (VOC)	0.38	1.67
Total sum of all Hazardous Air Pollutants (HAPs)	0.13	0.57
Green House Gas Emissions as Total CO ₂ e	N/A	N/A

The standard and maximum operating schedules of the facility will be 24 hours, 7 days a week and a maximum of 52 weeks per year.

The owner and/or operator of the facility is: OLAM West Coast, Inc., 205 E. River Park Circle, Suite 310, Fresno, CA 93720.

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager, New Mexico Environment Department, Air Quality Bureau, 525 Camino de los Marquez, Suite 1, Santa Fe, New Mexico, 87505-1318. Other comments and questions may be submitted verbally. (505) 476-4300; 1-800-224-7009.

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State of New Mexico Workers' Compensation Act

WORKERS' COMPENSATION

If You Are Si Se Lastió

- 1) Notice -- In most cases you must tell your employer about the accident within 15 days, using the Notice of Accident Form.
- 2) You have the right to information assistance from an information known as an Ombudsman at the Workers' Compensation Administration.
- 3) Claims information -- Contact your employer's Claims Representative (see box below).

Employer's

Name: _____
Phone #: _____
Address: _____

Note: Employer

YOUR RIGHTS

If you are injured in a work-related accident

your insurer must pay all necessary medical costs.

If you may not have the right to choose a provider. If your employer has written instructions about an ombudsman. In an emergency medical care first.

If you work for more than seven days, your insurer must pay wage benefits. If you receive partial wage benefits.

If you have a "permanent impairment," you may receive partial wage benefits.

8 are located at the following:
Farmington: 1-800-624-7310
Albuquerque: 1-505-599-9746

If Si Usted Si Uste
1-866

USE A NOTICE

DYER: You are not Accident forms

OSHA's Form 300A (Rev. 01/2004) Summary of Work-Related Injuries and Illnesses

All establishments covered by this form must complete this summary annually, even if no injuries or illnesses occurred during the year. (Establishment to complete this form if it has one or more employees.)

Using this form, you will be able to identify areas where you need to improve safety and health. You will also be able to identify areas where you need to improve safety and health.

Establishment name, address, and phone number: _____
OSHA Form 300A (Rev. 01/2004)

Number of Cases
Total number of deaths: _____
Total number of cases with days away from work: _____
Total number of cases with job transfer or restriction: _____

Number of Days
Total number of days away from work: _____
Total number of days with job transfer or restriction: _____

Injury and Illness Types
Total number of: _____
(1) Injury: _____ (2) Skin Disorder: _____ (3) Respiratory Condition: _____
(4) Poisoning: _____ (5) Hearing Loss: _____ (6) All Other Injuries: _____

Post this Summary page from February 1 to April 30 of the year following the year covered by the form. (If you do not post this form, you may be subject to a citation and penalty.)

Establishment Information

Your establishment name: OLAM Spices and Vegetables Ingredients, Inc.
Date: 1/18/2024
Industry: _____
NAICS Code: _____
OSHA Form 300A (Rev. 01/2004)

Employment Information

Actual average number of employees: 130
Total hours worked by all employees: 104,400

Sign here

I certify that I have reviewed this document and that it is true to the best of my knowledge and belief. I am the owner, manager, or supervisor of the establishment.
Signature: _____
Title: _____
Date: _____

Para. Piensa. Protege.

Si valoramos la seguridad! Proteger la vida y crear una cultura de cero daños comienza con el compromiso de cada uno de nosotros.



Para Si vas a trabajar, asegúrate de usar siempre tu equipo de protección personal.
Piensa Piensa Piensa Piensa Piensa Piensa Piensa Piensa Piensa Piensa
Protege Proteger a mí mismo y a los demás es mi responsabilidad. Los procedimientos de seguridad.

UNITED STATES POSTAL SERVICE

\$12

*purchase of 10 plates or more we
will deliver to businesses



NOTICE

OLAM West Coast, Inc. announces its application to the New Mexico Environment Department for an air quality permit for the modification of its **OLAM Spices and Vegetables Ingredients** facility. The expected date of application submittal to the Air Quality Bureau is **October 18, 2024**.

The exact location for the proposed facility known as **Olam Spices and Vegetable Ingredients, Inc.** is at **1650 W. Amador Ave, Las Cruces, NM 88005**. The approximate location of this facility is **0.33 miles West of the intersection of W Amador Ave and S Valley Dr** in Doña Ana county.

The proposed modification consists of the removal of a cryo mill, four seed dryers, and three boilers. The installation of a new boiler as well as the replacement of two boilers, a finish mill, and a steam sterilizer.

The estimated maximum quantities of any regulated air contaminant will be as follows in pound per hour (pph) and tons per year (tpy) and may change slightly during the course of the Department's review:

Pollutant:	Pounds per hour	Tons per year
PM ₁₀	0.98	4.27
PM _{2.5}	0.64	2.80
Sulfur Dioxide (SO ₂)	0.40	1.74
Nitrogen Oxides (NO _x)	6.94	30.38
Carbon Monoxide (CO)	5.83	25.52
Volatile Organic Compounds (VOC)	0.38	1.67
Total sum of all Hazardous Air Pollutants (HAPs)	0.13	0.57
Green House Gas Emissions as Total CO ₂ e	n/a	n/a

The standard and maximum operating schedules of the facility will be 24 hours, 7 days a week and a maximum of 52 weeks per year.

The owner and/or operator of the Facility is: **OLAM West Coast, Inc., 205 E. River Park Circle, Suite 310, Fresno, CA 93720**.

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager, New Mexico Environment Department; Air Quality Bureau, 525 Camino de los Marquez, Suite 1, Santa Fe, New Mexico, 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

With your comments, please refer to the company name and facility name, or send a copy of this notice along with your comments. This information is necessary since the Department may have not yet received the permit application. Please include a legible return mailing address. Once the Department has completed its preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

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Este es un aviso de la oficina de Calidad del Aire del Departamento del Medio Ambiente de Nuevo México, acerca de las emisiones producidas por un establecimiento en esta área. Si usted desea información en español, por favor comuníquese con esa oficina al teléfono 505-629-3395.

Notice of Non-Discrimination

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EARLY VOTING BEGINS

OCTOBER 8TH-
NOVEMBER 1ST *

MON-FRI | 8AM-5PM

NOVEMBER 2ND

SAT | 10AM-6PM

*CLOSED MON, OCT 14TH FOR
INDIGENOUS PEOPLES DAY

DOÑA ANA COUNTY
GOVERNMENT CENTER

845 N. MOTEL BLVD.

LAS CRUCES, NM 88007

DACELECTIONS.COM



• FIND YOUR NEAREST VOTING
LOCATION CONVENIENCE
CENTER

• FIND YOUR NEAREST OUT-
SECURED CONTAINER LOCATION

ABSENTEE VOTING

• APPLICATIONS MUST BE
SUBMITTED BY OCTOBER 22ND

• ABSENTEE BALLOTS MUST BE
RETURNED BY NOVEMBER
5TH BY 7PM

• DROP OFF AT ANY VOTING
CONVENIENCE CENTER OR
ANY SECURED CONTAINER
LOCATION

• APPLY FOR A FEDERAL/
OVERSEAS ABSENTEE BALLOT
AT
FVAP.GOV



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DAY

ER 5TH

PM

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CENTERS

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egistration ends

egistration begins at

ny Government

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E APPLICATIONS

submit on

for an absentee

Y OF EARLY

early voting at all early

ations

o submit an application

ot/overseas ballot

IN DAY 2024

1 AM-7PM

Ballots must be received

list of all voting locations

elections.com

ORA ANA COUNTY

ELECTIONS

BUREAU

6 N. Motel Blvd.

Las Cruces, NM 88007

TEL: 505-647-7626

elections@doanacounty.org

THOMAS BRANIGAN LIBRARY

NOTICE OF AIR QUALITY PERMIT APPLICATION

OLAM West Coast, Inc. announces its application to the New Mexico Environment Department for an air quality permit for the modification of its OLAM Spices and Vegetables Ingredients facility. The expected date of application submittal to the Air Quality Bureau is October 15, 2024.

The exact location for the proposed facility known as Olam Spices and Vegetable Ingredients, Inc. is at 1650 W. Amador Ave, Las Cruces, NM 88005. The approximate location of this facility is 0.33 miles West of the intersection of W Amador Ave and S Valley Dr in Doña Ana county.

The proposed modification consists of the removal of a cryo mill, four seed dryers, and three boilers. The installation of a new boiler as well as the replacement of two boilers, a finish mill, and a steam sterilizer.

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Nitrogen Oxides (NO _x)	6.94	30.38
Carbon Monoxide (CO)	5.83	25.52
Volatile Organic Compounds (VOC)	0.38	1.67
Total sum of all Hazardous Air Pollutants (HAPs)	0.13	0.57
Green House Gas Emissions as Total CO ₂ e	n/a	n/a

The standard and maximum operating schedules of the facility will be 24 hours, 7 days a week and a maximum of 52 weeks per year.

The owner and/or operator of the facility is: OLAM West Coast, Inc., 205 E. River Park Circle, Suite 310, Fresno, CA 93720.

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager, New Mexico Environment Department, Air Quality Bureau, 525 Camino de los Marquez, Suite 1, Santa Fe, New Mexico, 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

Please refer to the company name and site name, or send a copy of this notice along with your comments, since the Department may have not yet received the permit application. Please include a legible return mailing address with your comments. Once the Department has performed a preliminary review of the application and its air quality impacts, the Department's notice will be published in the legal section of a newspaper circulated near the facility location.

General information about air quality and the permitting process, and links to the regulations can be found at the Air Quality Bureau's website: www.emn.nm.gov/air-quality/permitting-section-home-page/. The regulation dealing with public participation in the permit review process is 20.2.72.206 NMAC.

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2024 General Election

Alternate Early Voting Locations

Open October 18th-November 2nd
Tuesday-Saturday
10AM-7PM

ANTHONY
Anthony Public Library
Anthony, NM 88021

CHAPARRAL
Doña Ana Community College-
Chaparral
755 Prescott Anthony Dr.
Chaparral, NM 88081

HATCH
Hatch Valley Public Schools
Student Services/Training Center
350 Main SE
HATCH, NM 87937

LAS CRUCES
Corbett Center Student Union
1600 International Mall
Las Cruces, NM 88003

**Doña Ana Community College-
East Mesa Campus**
2800 Sonoma Ranch Blvd.
Las Cruces, NM 88001

Las Cruces City Hall
700 N. Main St.
Las Cruces, NM 88001

MESILLA
Mesilla Town Hall
2231 Avenida de Mesilla
Mesilla, NM 88048

SUNLAND PARK
Doña Ana Community College-
Sunland Park
3343 Al-Nuri Rd.
Sunland Park, NM 88063

NMVOTE.ORG



• REGISTER TO VOTE
• REQUEST AN ABSENTEE
BALLOT
• VIEW YOUR SAMPLE BALLOT

ELECTION

NOVEMBER

7AM-7PM

42 VOTING LOCATIONS

CONVENIENCE

IMPORTANT

OCT 08

EARLY VOTING
• Doña Ana County
Center 8AM-5PM
• Online Mail Request
• Same day registration
Doña Ana County Center

OCT 19

ALTERNATE SITES
• Expanded early voting
alternate locations
• Same day registration
alternate locations

OCT 22

ABSENTEE APPLICATION
• Last day to submit an
application for an absentee
ballot

NOV 02

LAST DAY OF EARLY
VOTING
• Last day of early voting at
voting locations
• Last day to submit an application
for a federal/overseas ballot

NOV 05

ELECTION DAY 2024
• Polls open 7AM-7PM
• Absentee ballots must be received
by 7PM
• For a full list of all voting locations,
visit: DoaElections.com

DOÑA ANA COUNTY
Clerk's Office
ELECTIONS BUREAU
800 N. Main St.
Las Cruces, NM 88001
DOAELECTIONS.COM
575-847-7009
www.donaanacounty.org

Table of Noticed Neighbors

Name	Address	City	State	Zip Code
Yes Valley Verde LLC	5050 SO Syracuse Street Suite 1200	Denver	CO	80237
Sagebrush LLC	PO Box 194	Fairacres	NM	88033
A and B Land Investment LLC	PO Box 1779	Las Cruces	NM	88004
1510 Amador LLC	2000 E Lohman Suite C	Las Cruces	NM	88001
Amador Holding & Leasing Co	1530 W Amador	Las Cruces	NM	88005-4007

Table of Noticed Municipalities

Name	Address	City	State	Zip Code
Las Cruces City Manager	700 N Main St	Las Cruces	NM	88001
Town of Mesilla	2231 Avenida de Mesilla, PO Box 10	Mesilla	NM	88046

Table of Noticed Counties

Name	Address	City	State	Zip Code
Doña Ana County - County Manager's Office	845 N Motel Blvd	Las Cruces	NM	88007

Table of Noticed Tribes

Name	Address	City	State	Zip Code
	N/A- No tribes within the 10-mile radius			

Submittal of Public Service Announcement – Certification

I, Beth Morley, the undersigned, certify that on **October 22, 2024 and October 28, 2024**, submitted a public service announcement to **FM News Talk 92.7 / AM 1450 KOBE** that serves the City\Town\Village of **Las Cruces, Doña Ana** County, New Mexico, in which the source is or is proposed to be located and that **RADIO DID NOT RESPOND**.

Signed this 30 day of October, 2024,



Signature

10/30/2024

Date

Beth Morley

Printed Name

Consultant

Title {APPLICANT OR RELATIONSHIP TO APPLICANT}

AFFIDAVIT OF PUBLICATION

Trinity Consultants, Inc.
Trinity Consultants, Inc.
9400 Holly AVE NE # B
Albuquerque NM 87122-2968

STATE OF WISCONSIN, COUNTY OF BROWN

The Las Cruces Sun News, a newspaper published in the city of Las Cruces, Dona Ana County, State of New Mexico, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issue:

10/16/2024

and that the fees charged are legal.
Sworn to and subscribed before on 10/16/2024

Legal Clerk

Notary, State of WI, County of Brown

My commission expires

Publication Cost:	\$215.62	
Tax Amount:	\$17.38	
Payment Cost:	\$233.00	
Order No:	10671677	# of Copies:
Customer No:	1353025	1
PO #:		

THIS IS NOT AN INVOICE!

Please do not use this form for payment remittance

KATHLEEN ALLEN
Notary Public
State of Wisconsin

NOTICE OF AIR QUALITY PERMIT APPLICATION

OLAM West Coast, Inc. announces its application to the New Mexico Environment Department for an air quality permit for the modification of its **OLAM Spices and Vegetables Ingredients** facility. The expected date of application submittal to the Air Quality Bureau is **October 18, 2024**.

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The standard and maximum operating schedules of the facility will be 24 hours, 7 days a week and a maximum of 52 weeks per year.

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TX-80176-105

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Albuquerque NM 87122-2968

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The Las Cruces Sun News, a newspaper published in the city of
Las Cruces, Dona Ana County, State of New Mexico, and personal
knowledge of the facts herein state and that the notice hereto
annexed was Published in said newspapers in the issue:

10/16/2024

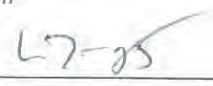
and that the fees charged are legal.
Sworn to and subscribed before on 10/16/2024



Legal Clerk



Notary, State of WI, County of Brown



My commission expires

Publication Cost:	\$120.75	
Tax Amount:	\$9.74	
Payment Cost:	\$130.49	
Order No:	10671684	# of Copies:
Customer No:	1353025	1
PO #:		

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KATHLEEN ALLEN
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DLAM West Coast, Inc. announces its application to the New Mexico Environment Department for an air quality permit for the modification of its **DLAM Spices and Vegetables Ingredients** facility. The expected date of application submittal to the Air Quality Bureau is **October 18, 2024**.

The exact location for the proposed facility known as **Olam Spices and Vegetable Ingredients, Inc.** is at **1650 W. Amador Ave, Las Cruces, NM 88005**. The approximate location of this facility is 0.33 miles West of the intersection of W Amador Ave and S Valley Dr in Doña Ana county.

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Total sum of all Hazardous Air Pollutants (HAPs)	0.13	0.57
Green House Gas Emissions as Total CO2e	n/a	n/a

The standard and maximum operating schedules of the facility will be 24 hours, 7 days a week and a maximum of 52 weeks per year.

The owner and/or operator of the Facility is: **DLAM West Coast, Inc., 205 E. River Park Circle, Suite 310, Fresno, CA 93720**.

If you have any comments about the construction or operation of this facility, and you want your comments to be made as part of the permit review process, you must submit your comments in writing to this address: Permit Programs Manager, New Mexico Environment Department, Air Quality Bureau, 525 Camino de los Marquez, Suite 1, Santa Fe, New Mexico; 87505-1816. Other comments and questions may be submitted verbally. (505) 476-4300; 1 800 224-7009.

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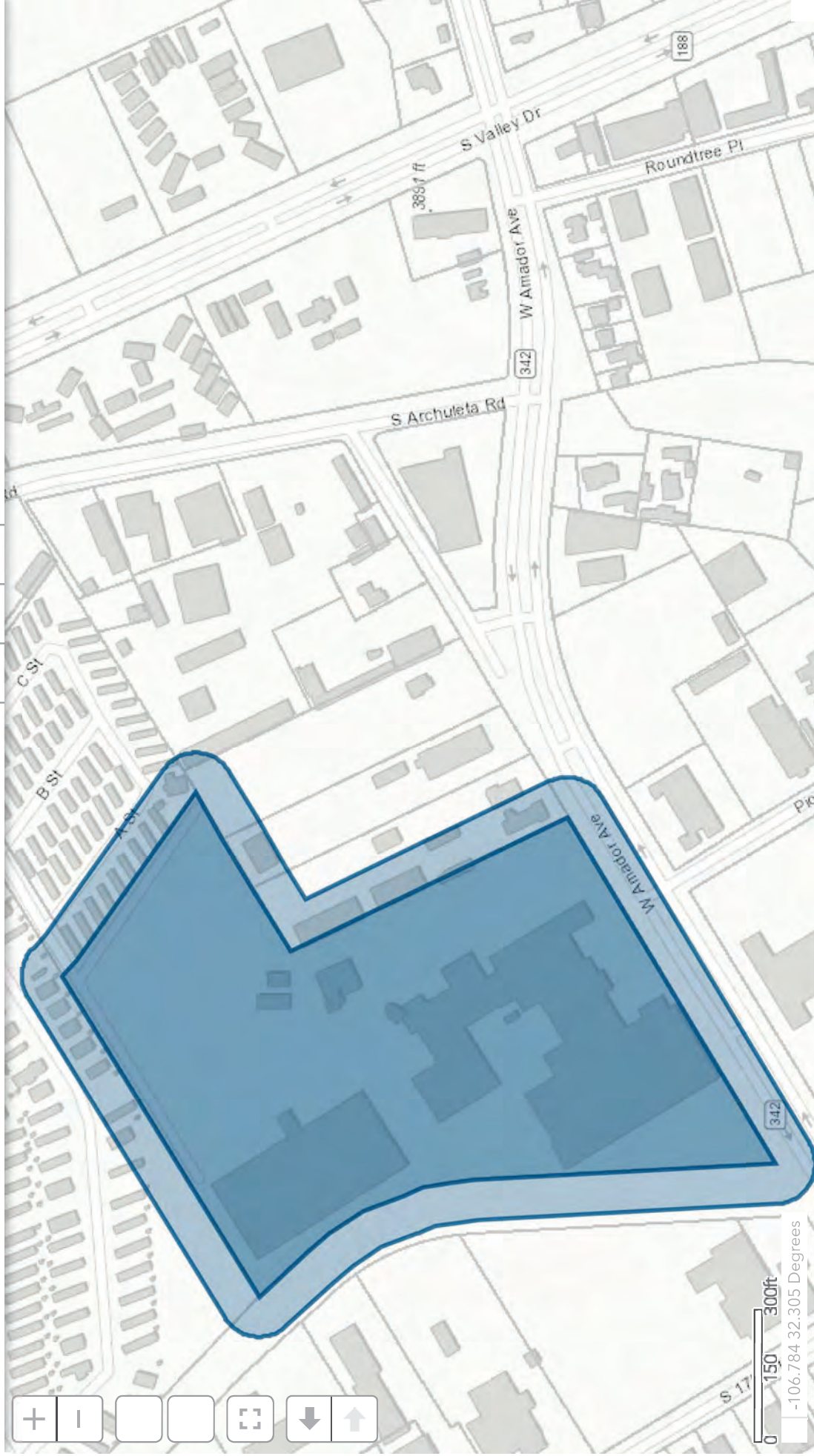
18-41572-420



Doña Ana County Parcel Map

Doña Ana County GI

Search Parcel Account



Incident

Locate Incident

Start Over

0.02 Miles

Section 10

Written Description of the Routine Operations of the Facility

A written description of the routine operations of the facility. Include a description of how each piece of equipment will be operated, how controls will be used, and the fate of both the products and waste generated. For modifications and/or revisions, explain how the changes will affect the existing process. In a separate paragraph describe the major process bottlenecks that limit production. The purpose of this description is to provide sufficient information about plant operations for the permit writer to determine appropriate emission sources.

OLAM Spices and Vegetable Ingredients, Inc. (OLAM) dries and mills whole chilies and other vegetable ingredients to produce various blends of chili powders and other vegetable products and store, package, and shipment. The OLAM SVI facility is located approximately within the city boundaries of Las Cruces, at 1650 W. Amador Avenue, Las Cruces, NM, 88005 in Dona Ana County. OLAM operates 8760 hours a year.

The facility operates 24 hours, seven (7) days a week. Routine operations include the arrival of trucks with raw vegetables. A hopper receives the vegetables and sends them to be sorted and the elimination of rocks, dirt, debris, and metal objects. During the harvest season between September and December, truck traffic is expected between 06:00 to 18:00 hours all week long. During the off-season, OLAM allows truck traffic between 08:00 to 16:00 during the weekdays.

There are seven production lines:

8. Dehydration and seed line;
9. Proctor Mill line;
10. Flake Room Line;
11. Steam Screw Room and OP Mill Line;
12. Cooking/Blending Line;
13. Packaging Line; and
14. Steam sterilizer Line

The warehouse is not included as an emission source since the chili powder and ingredients are stored in sealed bags and bins resulting in no particulate matter emissions.

This section details the regulated emission units and operations included in each production line, the associated emission unit capacities, and control devices.

Dehydration and Seed Line

Whole raw or dried chili pods are processed for seed extraction and dried for product milling. There are two chili dryers (GB-1 & GB-2). Fresh and dry pods are cleaned and then dehydrated by applying a uniform layer of pods on a conveyor belt that travels through the enclosed dryers. GB-1 is subdivided into several compartments, each with one or two natural gas-fired burners. The maximum capacity of all the burners combined is 29.6 MMBtu/hr. The twelve burners exhaust to five vertical stacks. Each of the burner capacities from front to back are as follows:

- 5.2 MMBtu/hr
- 3.6 MMBtu/hr
- 3.6 MMBtu/hr
- 2.8 MMBtu/hr
- 2.8 MMBtu/hr
- 2.8 MMBtu/hr
- 2.4 MMBtu/hr
- 2.8 MMBtu/hr
- 1.2 MMBtu/hr
- 0.8 MMBtu/hr
- 0.8 MMBtu/hr

GB-2 is also subdivided into several compartments, each with one or two natural gas-fired burners. The maximum combined capacity of the burners is 24.6 MMBtu/hr. The ten burners exhaust to four vertical stacks. Each of the burner capacities from front to back are as follows:

- 9.0 MMBtu/hr
- 2.8 MMBtu/hr
- 2.8 MMBtu/hr
- 2.4 MMBtu/hr
- 2.4 MMBtu/hr
- 1.6 MMBtu/hr
- 1.2 MMBtu/hr
- 0.8 MMBtu/hr
- 0.8 MMBtu/hr

Select batches of fresh pods are cleaned and deseeded for planting. The fresh chili pod pulp from the deseeding operation is diverted to the chili drying process described above.

Proctor Mill Line

The Proctor Mill Line can be loaded either by a box dump or by enclosed screw conveyor from the Dehydration and Seed Line weight hopper containing the primary dehydrated product. Two box dumps, equipment unit numbers STER#56 and PM#37 are used for this line. The Proctor Mill uses one enclosed Prater hammer mill with a maximum capacity of 7,500 lb/hr. The emission unit number for this mill is M-1. The primary dehydrated product is milled, then pneumatically transported to a cyclone and baghouse. The solids collected in the cyclone and baghouse are gravity fed to a sifter, where the oversize material goes back to the mill and the properly sized material is fed to a blender. The blender mixes the chili powder with other ingredients. The material is then either boxed for storage in the warehouse or pneumatically transported to the Cooker/Blender Line for finishing.

Emissions from box dump PM#37 are exhausted indoors, and emissions from STER#56 are exhausted from the box dump as part of Dust Collection #2 (DC-2) to a CHUBB baghouse (BH#8). Emissions are exhausted from the mill cyclone to a Kice baghouse (BH#1). Emissions are exhausted from the proctor blender cyclone (P-BL) to a MikroPul baghouse (BH#3). Process emissions from this line are cited in this application as emission source unit numbers DC-2, P-BL, and M-1.

Flake Room Line

The Flake Room Line is loaded by one box dump, equipment unit number FLK#5, for dehydrated chili pods and ingredient dumping. The flake Room operation uses an enclosed corn cutter mill, cyclone, sifters, and screw transport. This mill produces 1/4 inch, 1/8 inch, and "fine" sized products. The capacity of the mill is 350 lb/hr. The nuisance dust from the box dump and mill cyclone is vented to a Farr baghouse (BH#10). The dust collection process is emission source unit number DC-1. Process emissions for this line are cited in this application as if generated solely by DC-1.

Steam Screw Room and OP Mill Line

Product and ingredients are loaded into the Steam Screw Room and OP Mill Line via three box dumps, equipment unit numbers STER#56, STER #63, and OP-CB27. The product is processed by the steam screw, a sifter, and goes either to the Prater hammer mill for further grinding or to the blender and finally the filling operation. Product can be loaded to bypass the steam screw and/or the hanging sifter. Particulate emissions from the box dumps are vented as part of Dust Control #2 (DC-2) to a CHUBB baghouse, emission control unit BH#8. The Prater hammer mill is emission source unit number M-3 and has a maximum capacity of 7,500 lb/hr. Particulate emissions generated in the milling process are vented from a cyclone and on to a MikroPul baghouse (BH#3). Emissions from this line are designated as components of DC-2 and the milling operation M-3.

Cooking/Blending Line

The Cooking/Blending Line is where the majority of products to completion. Four box dumps (INP1#5, INP2#17, INP#26, and INP#25) load material into a pneumatic transport line that leads to four cyclones, which feed the hoppers of three cooker/blender units (C-BL). Emissions are vented from the box dumps directly to a Kice baghouse (BH#4) including emissions from the cooker/blender cyclones. Each cooker/blender has a capacity of 8,000 lb/hr. The cooker/blenders are heated by boiler BB-1. The boiler vents to a separate stack without emission controls.

The product is transported from the cooker/blenders through chilled pneumatic tubes to a cyclone. The emissions are vented from the cyclone to a CHUBB baghouse (BH#8). The chilled product is transported to three hoppers (Use Bins) which feed the cyclones, sifter, and mills. Ingredients can be added to the line at this point by three box dumps (BL1#7, BL2#32, and BL3#64). The combined box dumps are assigned emission unit number D-DS and are vented inside the building. The material from the Use Bins is transported to three cyclones and then the mill sifter. The over-sized product is transported to four mills

then back to the mill sifter cyclones. The four Baumeister hammer mills (M-4, M-5, M-6, M-7) each have a capacity of 8,000 lb/hr

The particulate emissions are vented from the mill sifter cyclones to a Kice baghouse (BH#6). The fine-sized product is transported to three more cyclones then the finishing blenders (F-BL). Each finishing blender has a capacity of 8,000 lb/hr. The particulate emissions from the finishing blender cyclones are vented to a Kice baghouse (BH#7). The finished product is pneumatically transported to three cyclones that feed the three final line hoppers (F-HP). Emissions are vented from the F-HP cyclones to a Kice baghouse (BH#5). Finally, the F-HP hoppers gravity feed the Packaging Line. Emissions from the Cooking/Blending Line are designated by the following emission unit numbers: C-BL, M-4, M-5, M-6, M-7, F-BL, and F-HP.

Packaging Line

The plant's final products are chili powder, chili pepper, paprika, and red pepper. The plant has a cumulative annual production of 105,120 tons. Product from multiple lines described in this application can be packaged at the end of each line if the desired product is produced. All of these filling operations are conducted inside the building, with closed doors. Because of the relatively large size distribution of the product and the fact that the filling operations occur in enclosed rooms, the emission from the filling operations have not included in this permit application.

The Packaging Line is loaded directly and exclusively from the Cooker/Blender Line. The final product from the Cooker/Blender Line is processed by a sifter that distributes the product to one or all of six packaging lines:

- Bag Lines 1 & 2
- Carton Line
- Tote Line
- Drum Line 1 & 2

Each packaging line has one shrouded pipe dispenser that is used to manually fill the containers/bags for shipping. Each filling area has a hood that vents to a baghouse. The particulate emissions from filling on the two Bag Lines, Carton Line, and two Drum Lines are vented to a Kice baghouse (BH#6). The particulate emissions from the Tote Line are vented to a Kice baghouse (BH#5). Process emissions from this line are cited in this application exactly as they are named: Bag Line 1, Bag Line 2, Carton Line, Tote Line, Drum Line 1, and Drum Line 2.

Steam Sterilizer Line

The steam sterilizers (SS-1 and SS-2) each utilize a 2 MMBtu/hr natural-gas fired boiler (BB-4 and BB-6). Two box dumps have the capacity to introduce 20,000 lbs/hr of chili powder to the steam sterilizer process line of SS-1 and 5,000 lbs/hr to steam sterilizer process line SS-2; particulate matter emissions from these box dumps will be vented to a baghouse (BH#11). Particulate matter from the steam sterilization process will be vented to a cyclone and then BH#11 for SS-1 and BH#12 for SS-2. After completion of steam treatment to kill bacteria, the chili powder will either be pneumatically transported to the existing packaging line or boxed for storage in the warehouse. Process emissions from this line are cited in this application as SS-1, SS-2, BB-4, and BB-6.

Section 11

Source Determination

Source submitting under 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC

Sources applying for a construction permit, PSD permit, or operating permit shall evaluate surrounding and/or associated sources (including those sources directly connected to this source for business reasons) and complete this section. Responses to the following questions shall be consistent with the Air Quality Bureau's permitting guidance, Single Source Determination Guidance, which may be found on the Applications Page in the Permitting Section of the Air Quality Bureau website.

Typically, buildings, structures, installations, or facilities that have the same SIC code, that are under common ownership or control, and that are contiguous or adjacent constitute a single stationary source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes. Submission of your analysis of these factors in support of the responses below is optional, unless requested by NMED.

A. Identify the emission sources evaluated in this section (list and describe): Refer to Table 2-A

B. Apply the 3 criteria for determining a single source:

SIC Code: Surrounding or associated sources belong to the same 2-digit industrial grouping (2-digit SIC code) as this facility, OR surrounding or associated sources that belong to different 2-digit SIC codes are support facilities for this source.

☒ Yes ☐ No

Common Ownership or Control: Surrounding or associated sources are under common ownership or control as this source.

☒ Yes ☐ No

Contiguous or Adjacent: Surrounding or associated sources are contiguous or adjacent with this source.

☒ Yes ☐ No

C. Make a determination:

☒ The source, as described in this application, constitutes the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes. If in "A" above you evaluated only the source that is the subject of this application, all "YES" boxes should be checked. If in "A" above you evaluated other sources as well, you must check **AT LEAST ONE** of the boxes "NO" to conclude that the source, as described in the application, is the entire source for 20.2.70, 20.2.72, 20.2.73, and 20.2.74 NMAC applicability purposes.

☐ The source, as described in this application, **does not** constitute the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes (A permit may be issued for a portion of a source). The entire source consists of the following facilities or emissions sources (list and describe):

Section 13

Determination of State & Federal Air Quality Regulations

This section lists each state and federal air quality regulation that may apply to your facility and/or equipment that are stationary sources of regulated air pollutants.

Not all state and federal air quality regulations are included in this list. Go to the Code of Federal Regulations (CFR) or to the Air Quality Bureau's regulation page to see the full set of air quality regulations.

Required Information for Specific Equipment:

For regulations that apply to specific source types, in the 'Justification' column **provide any information needed to determine if the regulation does or does not apply. For example**, to determine if emissions standards at 40 CFR 60, Subpart IIII apply to your three identical stationary engines, we need to know the construction date as defined in that regulation; the manufacturer date; the date of reconstruction or modification, if any; if they are or are not fire pump engines; if they are or are not emergency engines as defined in that regulation; their site ratings; and the cylinder displacement.

Required Information for Regulations that Apply to the Entire Facility:

See instructions in the 'Justification' column for the information that is needed to determine if an 'Entire Facility' type of regulation applies (e.g. 20.2.70 or 20.2.73 NMAC).

Regulatory Citations for Regulations That Do Not, but Could Apply:

If there is a state or federal air quality regulation that does not apply, but you have a piece of equipment in a source category for which a regulation has been promulgated, you must **provide the low level regulatory citation showing why your piece of equipment is not subject to or exempt from the regulation. For example** if you have a stationary internal combustion engine that is not subject to 40 CFR 63, Subpart ZZZZ because it is an existing 2 stroke lean burn stationary RICE with a site rating of more than 500 brake HP located at a major source of HAP emissions, your citation would be 40 CFR 63.6590(b)(3)(i). **We don't want a discussion of every non-applicable regulation, but if it is possible a regulation could apply, explain why it does not. For example**, if your facility is a power plant, you do not need to include a citation to show that 40 CFR 60, Subpart OOO does not apply to your non-existent rock crusher.

Regulatory Citations for Emission Standards:

For each unit that is subject to an emission standard in a source specific regulation, such as 40 CFR 60, Subpart OOO or 40 CFR 63, Subpart HH, include the low level regulatory citation of that emission standard. Emission standards can be numerical emission limits, work practice standards, or other requirements such as maintenance. **Here are examples:** a glycol dehydrator is subject to the general standards at 63.764C(1)(i) through (iii); an engine is subject to 63.6601, Tables 2a and 2b; a crusher is subject to 60.672(b), Table 3 and all transfer points are subject to 60.672(e)(1)

Federally Enforceable Conditions:

All federal regulations are federally enforceable. All Air Quality Bureau State regulations are federally enforceable except for the following: affirmative defense portions at 20.2.7.6.B, 20.2.7.110(B)(15), 20.2.7.11 through 20.2.7.113, 20.2.7.115, and 20.2.7.116; 20.2.37; 20.2.42; 20.2.43; 20.2.62; 20.2.63; 20.2.86; 20.2.89; and 20.2.90 NMAC. Federally enforceable means that EPA can enforce the regulation as well as the Air Quality Bureau and federally enforceable regulations can count toward determining a facility's potential to emit (PTE) for the Title V, PSD, and nonattainment permit regulations.

INCLUDE ANY OTHER INFORMATION NEEDED TO COMPLETE AN APPLICABILITY DETERMINATION OR THAT IS RELEVANT TO YOUR FACILITY'S NOTICE OF INTENT OR PERMIT.

EPA Applicability Determination Index for 40 CFR 60, 61, 63, etc: <http://cfpub.epa.gov/adi/>

To save paper and to standardize the application format, delete this sentence, and begin your submittal for this attachment on this page.

Table for State Regulations:

<u>State Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
20.2.1 NMAC	General Provisions	Yes	Facility	General Provisions apply to Notice of Intent, Construction, and Title V permit applications.
20.2.3 NMAC	Ambient Air Quality Standards NMAAQS	Yes	Facility	If subject, this would normally apply to the entire facility. 20.2.3 NMAC is a State Implementation Plan (SIP) approved regulation that limits the maximum allowable concentration of, Sulfur Compounds, Carbon Monoxide and Nitrogen Dioxide. Title V applications, see exemption at 20.2.3.9 NMAC The TSP NM ambient air quality standard was repealed by the EIB effective November 30, 2018.
20.2.7 NMAC	Excess Emissions	Yes	Facility	OLAM has an Excess Emissions Mitigation/SSM Plan to comply with 20.2.7 NMAC. OLAM has not emitted excess emissions of an air contaminant, including a fugitive emission, in excess of the quantity, rate, opacity or concentration specified by an air quality regulation or NSR Permit No. 1744M4R1 conditions.
20.2.23 NMAC	Fugitive Dust Control	No for permitted facilities, possible for NOIs	Facility	While Olam Spices and Vegetable Ingredients, Inc is in Doña Ana County, this is a permitted facility and therefore this regulation is not applicable.
20.2.33 NMAC	Gas Burning Equipment - Nitrogen Dioxide	Yes	Facility	This regulation does not apply to internal combustion equipment such as engines. It only applies to external combustion equipment such as heaters or boilers. Choose all that apply: ☒ This facility has new gas burning equipment (external combustion emission sources, such as gas fired boilers and heaters) having a heat input of greater than 1,000,000 million British Thermal Units per year per unit ☒ This facility has existing gas burning equipment having a heat input of greater than 1,000,000 million British Thermal Units per year per unit Note: "New gas burning equipment" means gas burning equipment, the construction or modification of which is commenced after February 17, 1972.
20.2.34 NMAC	Oil Burning Equipment: NO ₂	No	N/A	OLAM does not operate oil burning equipment; therefore, this regulation is not applicable.
20.2.35 NMAC	Natural Gas Processing Plant – Sulfur	No	N/A	This facility is not a natural gas processing plant. This regulation is not applicable.
20.2.37 and 20.2.36 NMAC	Petroleum Processing Facilities and Petroleum Refineries	N/A	N/A	These regulations were repealed by the Environmental Improvement Board. If you had equipment subject to 20.2.37 NMAC before the repeal, your combustion emission sources are now subject to 20.2.61 NMAC.
20.2.38 NMAC	Hydrocarbon Storage Facility	N/A	N/A	This facility does not process or store hydrocarbons. This regulation is not applicable.
20.2.39 NMAC	Sulfur Recovery Plant - Sulfur	N/A	N/A	This facility is not a Sulfur Recovery Plant. This regulation is not applicable.
20.2.50 NMAC	Oil and Gas Sector – Ozone Precursor Pollutants	N/A	N/A	This facility is not part of the Oil and Gas Sector. This regulation is not applicable.
20.2.61.109 NMAC	Smoke & Visible Emissions	Yes	BB-1, BB-4, BB-6, GB-1, GB-2	This facility operates natural gas fueled heaters and boilers subject to 20.2.61 NMAC. OLAM will comply with this regulation where applicable. This regulation that limits opacity to 20% applies to Stationary Combustion Equipment, such as engines, boilers, heaters, and flares unless your equipment is subject to another state regulation that limits particulate matter such as 20.2.19

<u>State Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification: (You may delete instructions or statements that do not apply in the justification column to shorten the document.)
				NMAC (see 20.2.61.109 NMAC). If equipment at your facility was subject to the repealed regulation 20.2.37 NMAC it is now subject to 20.2.61 NMAC.
20.2.70 NMAC	Operating Permits	No	N/A	This facility is a Minor Source. This regulation is not applicable.
20.2.71 NMAC	Operating Permit Fees	No	N/A	This facility is not subject to 20.2.70 NMAC; therefore, this regulation is not applicable.
20.2.72 NMAC	Construction Permits	Yes	Facility	Unit GB-1 and GB-2 have a PER of more than 10 TPY of NO ₂ .
20.2.73 NMAC	NOI & Emissions Inventory Requirements	Yes	Facility	This facility emits more than 10 tons of NO _x and CO in any calendar year. OLAM will comply with this state regulation.
20.2.74 NMAC	Permits – Prevention of Significant Deterioration (PSD)	No	N/A	This facility does not have a PSD. This regulation is not applicable.
20.2.75 NMAC	Construction Permit Fees	Yes	Facility	OLAM is submitting an application pursuant to 20.2.72 NMAC; therefore, this regulation applies. OLAM will comply with this state regulation.
20.2.77 NMAC	New Source Performance	No	N/A	There are no units at this facility subject to the requirements of 40 CFR Part 60. This regulation is not applicable.
20.2.78 NMAC	Emission Standards for HAPS	No	N/A	This facility does not emit hazardous air pollutants which are subject to the requirements of 40 CFR Part 61. This regulation is not applicable.
20.2.79 NMAC	Permits – Nonattainment Areas	No	N/A	This facility is not located in a nonattainment area. This regulation is not applicable.
20.2.80 NMAC	Stack Heights	No	N/A	None cited as applicable in NSR Permit 1744-M4. This regulation is not applicable.
20.2.82 NMAC	MACT Standards for source categories of HAPS	N/A	Units Subject to 40 CFR 63	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63.

Table for Applicable Federal Regulations (Note: This is not an exhaustive list):

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
40 CFR 50	NAAQS	Yes	Facility	If subject, this would normally apply to the entire facility. This applies if you are subject to 20.2.70, 20.2.72, 20.2.74, and/or 20.2.79 NMAC.
NSPS 40 CFR 60, Subpart A	General Provisions	No	N/A	Subpart in 40 CFR 60 does not apply to any units in this facility.
NSPS 40 CFR 60.40a, Subpart Da	Subpart Da, Performance Standards for Electric Utility Steam Generating Units	No	N/A	There are no Electric Utility Steam Generating Units at this facility. This subpart is not applicable.

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
NSPS 40 CFR60.40b Subpart Db	Electric Utility Steam Generating Units	No	N/A	There are no Electric Utility Steam Generating Units at this facility. This subpart is not applicable.
40 CFR 60.40c, Subpart Dc	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	No	N/A	This facility does not contain small industrial, commercial, or institutional Steam generating Units. This subpart is not applicable.
NSPS 40 CFR 60, Subpart Ka	Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984	No	N/A	There are no Storage Vessels for Petroleum Liquids at this facility. This subpart is not applicable.
NSPS 40 CFR 60, Subpart Kb	Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984	No	N/A	There are no Volatile Organic Liquid Storage Vessels at this facility. This subpart is not applicable.
NSPS 40 CFR 60.330 Subpart GG	Stationary Gas Turbines	No	N/A	There are no Stationary Gas Turbines at this facility. This subpart is not applicable.
NSPS 40 CFR 60, Subpart KKK	Leaks of VOC from Onshore Gas Plants	No	N/A	This facility is not a Gas Plant. This subpart is not applicable.
NSPS 40 CFR Part 60 Subpart LLL	Standards of Performance for Onshore Natural Gas Processing: SO₂ Emissions	No	N/A	This facility is not a Natural Gas Processing Plant This subpart is not applicable.
NSPS 40 CFR Part 60 Subpart OOOO	Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution for which construction, modification or	No	N/A	This facility does not produce, transmit, or distribute crude oil or natural gas. This subpart is not applicable.

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
	reconstruction commenced after August 23, 2011 and before September 18, 2015			
NSPS 40 CFR Part 60 Subpart OOOOa	Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015	No	N/A	This facility does not produce, transmit, or distribute crude oil or natural gas. This subpart is not applicable.
NSPS 40 CFR 60 Subpart IIII	Standards of performance for Stationary Compression Ignition Internal Combustion Engines	No	N/A	This facility does not have any compression ignition internal combustion engines. This subpart is not applicable.
NSPS 40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	No	N/A	This facility does not have any stationary spark ignition internal combustion engines. This subpart is not applicable.
NSPS 40 CFR 60 Subpart TTTT	Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units	No	N/A	This facility does not have any electric generating units. This subpart is not applicable.
NSPS 40 CFR 60 Subpart UUUU	Emissions Guidelines for Greenhouse Gas Emissions and Compliance Times for Electric Utility Generating Units	No	N/A	This facility does not have any electric utility generating units. This subpart is not applicable.
NSPS 40 CFR 60, Subparts WWW, XXX, Cc, and Cf	Standards of performance for Municipal Solid Waste (MSW) Landfills	No	N/A	This facility is not a Landfill. This subpart is not applicable.
NESHAP 40 CFR 61 Subpart A	General Provisions	No	N/A	No other Subpart in 40 CFR 61 applies; therefore, this subpart is not applicable.
NESHAP 40 CFR 61 Subpart E	National Emission Standards for Mercury	No	N/A	This facility does not process mercury. This subpart is not applicable.
NESHAP	National Emission Standards for Equipment Leaks	No	N/A	This facility does not produce, transmit, or distribute crude oil or natural gas. This subpart is not applicable.

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
40 CFR 61 Subpart V	(Fugitive Emission Sources)			
MACT 40 CFR 63, Subpart A	General Provisions	No	N/A	Applies if any other Subpart in 40 CFR 63 applies.
MACT 40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities	No	N/A	This facility does not produce, transmit, or distribute crude oil or natural gas. This subpart is not applicable.
MACT 40 CFR 63 Subpart HHH		No	N/A	This facility is not Subject to the requirements of 40 CFR 63 Subpart HHH.
MACT 40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Industrial, Commercial, and Institutional Boilers & Process Heaters	No	N/A	This facility does not own or operate Major Industrial, Commercial, and Institutional Boilers & Process Heaters. This subpart is not applicable.
MACT 40 CFR 63 Subpart UUUUU	National Emission Standards for Hazardous Air Pollutants Coal & Oil Fire Electric Utility Steam Generating Unit	No	N/A	This facility does not own or operate Coal & Oil Fire Electric Utility Steam Generating Units. This subpart is not applicable.
MACT 40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE MACT)	No	N/A	This facility does not own or operate a stationary RICE. This subpart is not applicable.
40 CFR 64	Compliance Assurance Monitoring	No	N/A	NESHAP 40 CFR 64 does not apply to this facility.
40 CFR 68	Chemical Accident Prevention	No	N/A	This facility does not have more than a threshold quantity of a regulated substance in a process. As determined under 40 CFR 68.115. This subpart is not applicable.
Title IV – Acid Rain 40 CFR 72	Acid Rain	No	N/A	This facility is not an acid rain source. This subpart is not applicable.

<u>Federal Regulation Citation</u>	Title	Applies? Enter Yes or No	Unit(s) or Facility	Justification:
Title IV – Acid Rain 40 CFR 73	Sulfur Dioxide Allowance Emissions	No	N/A	This facility is not an acid rain source. This subpart is not applicable.
Title IV-Acid Rain 40 CFR 75	Continuous Emissions Monitoring	No	N/A	This facility does not generate commercial electric power or electric power for sale. his subpart is not applicable.
Title IV – Acid Rain 40 CFR 76	Acid Rain Nitrogen Oxides Emission Reduction Program	No	N/A	This facility is not an acid rain source. This subpart is not applicable.
Title VI – 40 CFR 82	Protection of Stratospheric Ozone	No	N/A	This facility does not service, maintain, or repair class I or class II appliances nor dispose of the appliances.

Section 14

Operational Plan to Mitigate Emissions

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

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- ☐ **Title V Sources** (20.2.70 NMAC): By checking this box and certifying this application the permittee certifies that it has developed an Operational Plan to Mitigate Emissions During Startups, Shutdowns, and Emergencies defining the measures to be taken to mitigate source emissions during startups, shutdowns, and emergencies as required by 20.2.70.300.D.5(f) and (g) NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- ☒ **NSR** (20.2.72 NMAC), **PSD** (20.2.74 NMAC) & **Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has developed an Operational Plan to Mitigate Source Emissions During Malfunction, Startup, or Shutdown defining the measures to be taken to mitigate source emissions during malfunction, startup, or shutdown as required by 20.2.72.203.A.5 NMAC. This plan shall be kept on site to be made available to the Department upon request. This plan should not be submitted with this application.
- ☒ **Title V** (20.2.70 NMAC), **NSR** (20.2.72 NMAC), **PSD** (20.2.74 NMAC) & **Nonattainment** (20.2.79 NMAC) **Sources:** By checking this box and certifying this application the permittee certifies that it has established and implemented a Plan to Minimize Emissions During Routine or Predictable Startup, Shutdown, and Scheduled Maintenance through work practice standards and good air pollution control practices as required by 20.2.7.14.A and B NMAC. This plan shall be kept on site or at the nearest field office to be made available to the Department upon request. This plan should not be submitted with this application.
-

If OLAM experiences a malfunction, startup, or shutdown, at this facility that results in the exceedance of the requested emission limits of this application, then it will notify the Department verbally as soon as possible, but no later than 24 hours after the start of the next regular business day. Additionally, OLAM will submit written notification within 10 days after the start of the next regular business day following the initial occurrence of the excess emissions.

This facility uses clean-burning, commercial pipeline natural gas as fuel for its boilers and heaters. The fuel burns clean and will not produce smoke like other denser fuels such as diesel or fuel oil even as the temperature of the burners transitions into a steady state. The most common failure of a baghouse is excess accumulation of material on the filter, which causes a rise in pressure drop and alerts the plant staff that the filter requires maintenance; this form of failure does not result in excess emissions.

The baghouses operated by OLAM are subject to failure due to pinholes or punctures of the filter fabric or the loss of pulse air. The failure of fabric filters might cause an increase from 0% to $\geq 20\%$ opacity. The baghouses cannot be operated at a lower inlet flow and must be shut down to mitigate emissions.

Shut Down Procedure

During a shut-down of the dryer units, the sequence is as follows:

1. The process removes the application of thermal energy by the shutdown of natural gas flow to the heaters or boilers.
2. The Unit stops delivery of the product and begins internal recirculation to allow the spices to cool down.
3. Alternative step: The process removes the spices from the unit as it begins to remove thermal energy.
4. The control process will stop the cyclone and baghouse blowers once the mill and blender units are empty of spices to complete the shutdown.

Once Maintenance repairs the torn fabric filters or has re-established pulse air, the baghouses are ready to operate. The steps to restart the processes are:

Start-up Procedure

During start-up the dryer units, the process sequence is as follows:

1. The control system turns the blowers for the cyclones and baghouses.

2. The unit starts accepting spices into the dryers or cooking units in recirculation mode. The dryers and cooking units require the presence of spices to serve as a thermal load. The absence of a thermal load in the dryers and cookers can cause incoming spices to burn and char causing an unusable product.
3. The Process applies thermal energy from either heaters or steam.

OLAM conducts maintenance—scheduled or unscheduled—only on equipment that has been shut down, so no excess emissions are anticipated. In the case of scheduled maintenance that does result in excess emissions, OLAM will notify the Department verbally no later than 24 hours prior to the initial occurrence of the excess emissions and will submit written notification within 10 days after the start of the next regular business day.

The OLAM facility is a minor source for all criteria pollutants and does not foresee an eventuality in the process that might cause a severe exceedance of emissions. During environmental contingencies or extraordinary events in the Doña Ana County, OLAM will coordinate with the environmental or health agencies to temporarily curtail production operations until the environmental contingencies or events have passed.

Section 15

Alternative Operating Scenarios

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

Alternative Operating Scenarios: Provide all information required by the department to define alternative operating scenarios. This includes process, material and product changes; facility emissions information; air pollution control equipment requirements; any applicable requirements; monitoring, recordkeeping, and reporting requirements; and compliance certification requirements. Please ensure applicable Tables in this application are clearly marked to show alternative operating scenario.

Construction Scenarios: When a permit is modified authorizing new construction to an existing facility, NMED includes a condition to clearly address which permit condition(s) (from the previous permit and the new permit) govern during the interval between the date of issuance of the modification permit and the completion of construction of the modification(s). There are many possible variables that need to be addressed such as: Is simultaneous operation of the old and new units permitted and, if so for example, for how long and under what restraints? In general, these types of requirements will be addressed in Section A100 of the permit, but additional requirements may be added elsewhere. Look in A100 of our NSR and/or TV permit template for sample language dealing with these requirements. Find these permit templates at: www.env.nm.gov/air-quality/permitting-section-procedures-and-guidance/. Compliance with standards must be maintained during construction, which should not usually be a problem unless simultaneous operation of old and new equipment is requested.

In this section, under the bolded title “Construction Scenarios”, specify any information necessary to write these conditions, such as: conservative-realistic estimated time for completion of construction of the various units, whether simultaneous operation of old and new units is being requested (and, if so, modeled), whether the old units will be removed or decommissioned, any PSD ramifications, any temporary limits requested during phased construction, whether any increase in emissions is being requested as SSM emissions or will instead be handled as a separate Construction Scenario (with corresponding emission limits and conditions, etc.

Alternative operating scenarios are not applicable to this facility. No alternative scenarios are requested by OLAM.

Section 16

Air Dispersion Modeling

- 1) Minor Source Construction (20.2.72 NMAC) and Prevention of Significant Deterioration (PSD) (20.2.74 NMAC) ambient impact analysis (modeling): Provide an ambient impact analysis as required at 20.2.72.203.A(4) and/or 20.2.74.303 NMAC and as outlined in the Air Quality Bureau's Dispersion Modeling Guidelines found on the Planning Section's modeling website. If air dispersion modeling has been waived for one or more pollutants, attach the AQB Modeling Section modeling waiver approval documentation.
- 2) SSM Modeling: Applicants must conduct dispersion modeling for the total short term emissions during routine or predictable startup, shutdown, or maintenance (SSM) using realistic worst case scenarios following guidance from the Air Quality Bureau's dispersion modeling section. Refer to "Guidance for Submittal of Startup, Shutdown, Maintenance Emissions in Permit Applications (http://www.env.nm.gov/aqb/permit/app_form.html) for more detailed instructions on SSM emissions modeling requirements.
- 3) Title V (20.2.70 NMAC) ambient impact analysis: Title V applications must specify the construction permit and/or Title V Permit number(s) for which air quality dispersion modeling was last approved. Facilities that have only a Title V permit, such as landfills and air curtain incinerators, are subject to the same modeling required for preconstruction permits required by 20.2.72 and 20.2.74 NMAC.

What is the purpose of this application?	Enter an X for each purpose that applies
New PSD major source or PSD major modification (20.2.74 NMAC). See #1 above.	
New Minor Source or significant permit revision under 20.2.72 NMAC (20.2.72.219.D NMAC). See #1 above. Note: Neither modeling nor a modeling waiver is required for VOC emissions.	X
Reporting existing pollutants that were not previously reported.	
Reporting existing pollutants where the ambient impact is being addressed for the first time.	
Title V application (new, renewal, significant, or minor modification. 20.2.70 NMAC). See #3 above.	
Relocation (20.2.72.202.B.4 or 72.202.D.3.c NMAC)	
Minor Source Technical Permit Revision 20.2.72.219.B.1.d.vi NMAC for like-kind unit replacements.	
Other: i.e. SSM modeling. See #2 above.	
This application does not require modeling since this is a No Permit Required (NPR) application.	
This application does not require modeling since this is a Notice of Intent (NOI) application (20.2.73 NMAC).	
This application does not require modeling according to 20.2.70.7.E(11), 20.2.72.203.A(4), 20.2.74.303, 20.2.79.109.D NMAC and in accordance with the Air Quality Bureau's Modeling Guidelines.	

Check each box that applies:

- ☐ See attached, approved modeling **waiver for all** pollutants from the facility.
- ☐ See attached, approved modeling **waiver for some** pollutants from the facility.
- ☒ Attached in Universal Application Form 4 (UA4) is a **modeling report for all** pollutants from the facility.
- ☐ Attached in UA4 is a **modeling report for some** pollutants from the facility.
- ☐ No modeling is required.

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:	Olam Spices and Vegetable Ingredients, Inc.
2	Name of company:	Olam West Coast, Inc
3	Current Permit number:	1744-M4R1
4	Name of applicant's modeler:	Adam Erenstein
5	Phone number of modeler:	505-266-6611
6	E-mail of modeler:	aerenstein@trinityconsultants.com

16-B: Brief

1	Was a modeling protocol submitted and approved?	Yes☒	No☐
2	Why is the modeling being done?	Adding New Equipment	
3	Describe the permit changes relevant to the modeling.		
	The purpose of this significant revision is: to add one (1) 2.0 MMBtu/h boiler (unit BB-6); to replace one (1) 8.4 MMBtu/h boiler with a 6.1 MMBtu/h boiler (unit BB-1), one (1) 6.4 MMBtu/h boiler with a 2.0 MMBtu/h boiler (unit BB-4), one (1) 2200 lb/hr Finish Mill with a 8000 lb/hr Finish Mill (unit M-7), and one (1) Raphanel steam sterilizer with a Safesteril steam sterilizer (unit SS-2); and to remove one (1) Cryo Mill (unit M-8), one (1) four seed dryers unit (unit SD1-4), and three (3) boilers (units BB-2, BB-3, BB-5).		
4	What geodetic datum was used in the modeling?	WGS84	
5	How long will the facility be at this location?	Longer than 1 year	

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	8/2/1995	
	SO2	Not Established	
	PM10	6/26/2000	
	PM2.5	Not Established	
9	Provide the name and distance to Class I areas within 50 km of the facility (300 km for PSD permits).		
	There are no Class I areas within 50 km of the facility.		
10	Is the facility located in a non-attainment area? If so describe below	Yes ☐	No ☒
	N/A		
11	Describe any special modeling requirements, such as streamline permit requirements.		
	N/A—There are no special modeling requirements for this facility.		

16-C: Modeling History of Facility

1	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).			
	Pollutant	Latest permit and modification number that modeled the pollutant facility-wide.	Date of Permit	Comments
	CO	N/A	-	The last modeling done for this permit was for 1744M3 in 2009 and was confirmed to be the last time this facility was modeled by NMED. The statement of Basis for permit 1744-M3R2 specifically lists PM _{2.5} as being modeled for permit 1744-M3.
	NO ₂	N/A	-	
	SO ₂	N/A	-	
	H ₂ S	N/A	-	
	PM2.5	1744-M3	6/15/09	
	PM10	N/A	-	
	Lead	N/A	-	
	Ozone (PSD only)	N/A	-	
NM Toxic Air Pollutants (20.2.72.402 NMAC)	N/A	-		

16-D: Modeling performed for this application

1	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.					
	Pollutant	ROI	Cumulative analysis	Culpability analysis	Waiver approved	Pollutant not emitted or not changed.

CO	☒	☐	☐	☐	☐
NO ₂	☒	☒	☐	☐	☐
SO ₂	☒	☐	☐	☐	☐
H ₂ S	☐	☐	☐	☐	☒
PM _{2.5}	☒	☒	☐	☐	☐
PM ₁₀	☒	☒	☐	☐	☐
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. N/A—There are no NMTAPs modeled for this application.					
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 ☐
	N/A		

16-G: Surrounding source modeling

1	Date of surrounding source retrieval	09/27/2024
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
	1610R2	Updated coordinates for facility. Source coordinates were: 340811.422 m E, 3830191.251 m N Facility coordinates are: 334962.95 m E, 3582089.17 m N
	151@1	Removed concrete batch plant, GCP-5 Permit #1995, Desert Vally Inc from NO ₂ surrounding sources as permitted equipment does not list anything that produces NO ₂ . The most recent permit application for this facility has been attached at the end of UA4 for reference.

		PM ₁₀ and PM _{2.5} emission rates were based off 95 tpy (21.69 lb/hr) total suspended particulate (TSP) from the GCP-5 permit for Concrete Batch plants. No emission calculations were submitted with the last permitting action. Since TSP is larger than both PM ₁₀ and PM _{2.5} , the 21.69 lb/hr emission rates were ratioed based on particle size multiplier constants taken from AP-42 Chapter 13.2.4 for Aggregate Handling And Storage Piles. The new values are: 10.26 lb/hr PM ₁₀ and 1.55 lb/hr PM _{2.5} . These calculations and references have been included at the end of UA4 for reference.
1947@1	Removed concrete batch plant, GCP-5 Permit #1445, Westgate Concrete Batch Plant from NO ₂ surrounding sources as permitted equipment does not list anything that produces NO ₂ . The most recent permit application for this facility has been attached at the end of UA4 for reference.	PM ₁₀ and PM _{2.5} emission rates were based off 95 tpy (21.69 lb/hr) total suspended particulate (TSP) from the GCP-5 permit for Concrete Batch plants. No emission calculations were submitted with the last permitting action. Since TSP is larger than both PM ₁₀ and PM _{2.5} , the 21.69 lb/hr emission rates were ratioed based on particle size multiplier constants taken from AP-42 Chapter 13.2.4 for Aggregate Handling And Storage Piles. The new values are: 10.26 lb/hr PM ₁₀ and 1.55 lb/hr PM _{2.5} . These calculations and references have been included at the end of UA4 for reference.

16-H: Building and structure downwash

1	How many buildings are present at the facility?	15 buildings are present at this facility.
2	How many above ground storage tanks are present at the facility?	There are no above ground storage tanks present at this facility.
3	Was building downwash modeled for all buildings and tanks? If not explain why below.	Yes ☒ No ☐
4	Building comments	There are seven polygonal buildings.

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. The property is enclosed by a fence and receptors are placed starting along the fence line.		
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
	Variable Density	Circle	50 meters	0	800	
	Variable Density	Circle	100 meters	800	3,000	
	Variable Density	Circle	250 meters	3,000	6,000	
	Variable Density	Circle	500 meters	6,000	10,000	
	Variable Density	Circle	1,000 meters	10,000	50,000	
5	Describe receptor spacing along the fence line.					
	25 m spacing.					
6	Describe the PSD Class I area receptors.					
	N/A—this facility is not within the 50 km inclusion zone for PSD minor sources.					

16-J: Modeling Scenarios

1	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).										
	N/A										
2	Which scenario produces the highest concentrations? Why?										
	N/A										
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: N/A										
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.										
	N/A										
6	Were different emission rates used for short-term and annual modeling? If so describe below.									Yes ☐	No ☒
	N/A										

16-K: NO₂ 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.			
	The ARM2 Methodology was used with the default maximum and minimum ambient ratios.			
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 ☐
	N/A			
4	Describe the design value used for each averaging period modeled.			
	1-hour: High eighth high Annual One Year Annual Average			

16-L: Ozone Analysis

1	NMED has performed a generic analysis that demonstrates sources that are minor with respect to PSD do not cause or contribute to any violations of ozone NAAQS. The analysis follows. The basis of the ozone SIL is documented in Guidance on Significant Impact Levels for Ozone and Fine Particles in the Prevention of Significant Deterioration Permitting Program, EPA, April 17, 2018 and associated documents. NMED accepts this SIL basis and incorporates it into this permit record by reference. Complete documentation of the ozone concentration analysis using MERPS is included in the New Mexico Air Quality Bureau Air Dispersion Modeling Guidelines.
2	The MERP values presented in Table 10 and Table 11 of the NM AQB Modeling Guidelines that produce the highest concentrations indicate that facilities emitting no more than 250 tons/year of NO_x and no more than 250 tons/year of VOCs will cause less formation of O₃ than the O₃ significance level. $[O_3]_{8-hour} = \left(\frac{250 \frac{ton}{yr}}{340_{MERP_{NOX}}} + \frac{250 \frac{ton}{yr}}{4679_{MERP_{VOC}}} \right) \times 1.96 \mu g/m^3$ =1.546 μg/m³, which is below the significance level of 1.96 μg/m³.

	Sources that produce ozone concentrations below the ozone SIL do not cause or contribute to air contaminant levels exceeding the ozone NAAQS.				
3	Does the facility emit at least 250 tons per year of NO _x or at least 250 tons per year of VOCs? Sources that emit at least 250 tons per year of NO _x or at least 250 tons per year of VOCs are covered by the analysis above and require an individual analysis.			Yes ☐	No ☒
5	For new PSD Major Sources or PSD major modifications, if MERPs were used to account for ozone fill out the information below. If another method was used describe below.				
	NO _x (ton/yr)	MERP _{NOX}	VOCs (ton/yr)	MERP _{VOC}	[O ₃] _{8-hour}
	N/A				

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.				
	N/A				
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.				
	Pollutant	NO _x	SO ₂		[PM2.5] _{24-hour}
	MERP _{annual}				
	MERP _{24-hour}				[PM2.5] _{annual}
	Emission rate (ton/yr)				
	N/A				

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.
	N/A

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		
	M-1	BH#1		
	M-3	BH#3		
	P-BL			
	C-BL	BH#4		
	Tote Line	BH#5		
	F-HP			
	F-BL	BH#7		
	DC-2	BH#8		
	DC-1	BH#10		
	SS-1	BH#11		
	SS-2	12A		
		12B		
	M-7	BH#6		
	Bag Line 1			
	Bag Line 2			
	Carton Line			
	Drum Line 1			
	Drum Line 2			
	GB-1 (GB 1A-1)	1A1		
	GB-1 (GB 1A-2A, GB 1A-2B)	1A2		
	GB-1 (GB 1A-3A, GB 1A-3B, GB 1A-4, GB 1A-5)	1A3		
	GB-1 (GB 1B-1, GB 1B-2)	1B1		
	GB-1 (GB 1C-1, GB 1C-2, GB 1C-3)	1C1		
	GB-2 (GB 2A-1)	2A1		
	GB-2 (GB 2A-2A, GB 2A-2B)	2A2		
	GB-2 (GB 2A-3A, GB 2A-3B)	2A3		
	GB-2 (GB 2B-1, GB 2B-2, GB 2C-1, GB 2C-2, GB 2C-3)	2B1		
	SD1-4 (marked to be removed)	SD1		
		SD2		
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 ☒
	The emissions rates of the units listed in Table 2-E are for each specific unit at the facility. There are special stacks at this facility. Emission rates in the modeling files were referenced from both Table 2-E and Table 2-G. Emission unit BH#7 has no exterior outlet. Additionally, emission rates in the PSD increment models may be different depending on a pollutant's PSD Baseline Date.			

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		
	BB-1	Yes	N/A	Yes	N/A		
	BB-4	Yes	N/A	Yes	N/A		
	BB-6	Yes	N/A	Yes	N/A		
	BagLine-1	Yes	N/A	No	N/A		
	BagLine-2	Yes	N/A	No	N/A		
	C-BL	Yes	N/A	Yes	N/A		
	Carton Line	Yes	N/A	No	N/A		
	DC-1	Yes	N/A	Yes	N/A		
	DC-2	Yes	N/A	Yes	N/A		
	DrumLine-1	Yes	N/A	No	N/A		
	DrumLine-2	Yes	N/A	No	N/A		
	F-BL	Yes	N/A	Yes	N/A		
	F-HP	Yes	N/A	Yes	N/A		
	GB-1	Yes	N/A	No	N/A		
	GB-2	Yes	N/A	No	N/A		
	M-1	No	N/A	No	N/A		
	M-3	No	N/A	No	N/A		
	M-4	Yes	N/A	Yes	N/A		
	M-5	Yes	N/A	Yes	N/A		
	M-6	Yes	N/A	Yes	N/A		
	M-7	Yes	N/A	Yes	N/A		
P-BL	Yes	N/A	No	N/A			
SS-1	Yes	N/A	Yes	N/A			
SS-2	Yes	N/A	Yes	N/A			
Tote Line	Yes	N/A	Yes	N/A			
5	PSD increment description for sources. (for unusual cases, i.e., baseline unit expanded emissions after baseline date).			If a source was originally baseline and it increased emissions after the baseline date, then the difference in emissions were used in the modeling. If a unit was baseline and it decreased emissions or was removed from the facility after the baseline date, then the difference in emissions were used in the modeling represented by a negative number.			
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 ☒	
	Increment consumption status was conservatively assumed to be consuming if the installation date was missing from Table 2-A.						

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)
	N/A	N/A	N/A	N/A

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?		Yes ☐	No ☒
	If not please explain how increment consumption status is determined for the missing installation dates below.			
	N/A			
2	Describe the determination of sigma-Y and sigma-Z for fugitive sources.			
	N/A - No volume or related sources at this facility.			
3	Describe how the volume sources are related to unit numbers. Or say they are the same.			
	N/A			
4	Describe any open pits.			
	N/A			
5	Describe emission units included in each open pit.			
	N/A			

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: N/A			
	NO ₂ : US-Mexico Border Crossing (350130021)			
	PM2.5: Las Cruces Distric Office (350130025)			
	PM10: Las Cruces City Well #46 (350130024)			
	SO ₂ : N/A			
	Other:			
	Comments:	Background concentrations were only used for the following NAAQS models: NO ₂ annual, PM _{2.5} annual, and PM ₁₀ 24-hr CIA. Background concentrations were not used in any PSD increment modeling.		
2	Were background concentrations refined to monthly or hourly values? If so describe below.		Yes ☐	No ☒
	N/A			

16-S: Meteorological Data

1	Was NMED provided meteorological data used? If so select the station used.	Yes ☒	No ☐
---	--	---	-----------------------------

	Las Cruces		
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.		
	N/A		

16-T: Terrain

1	Was complex terrain used in the modeling? If not, describe why below.	Yes ☒	No ☐
	N/A		
2	What was the source of the terrain data?		
	Terrain was incorporated into the modeling analysis through the use of AERMAP with the most recent 1/3 degree DEM data currently available from https://apps.nationalmap.gov/downloader/#/ .		

16-U: Modeling Files

1	Describe the modeling files: Significant Impact Models - File name format "OLAM_Poll_SIL.ami" "Poll" = NO₂... nitrogen oxides; CO...carbon monoxide; PM₁₀...particulate matter, PM₁₀; PM_{2.5}...particulate matter, PM_{2.5}; SO₂... sulfur dioxide "SIL" SIL designator - Files may contain SIL for short-term, annual, and increment averaging periods. NM/NAAQS and Increment Models - File name format "OLAM_Poll_AvgPer_Standard.ami" "Poll" = NO₂... nitrogen oxides; CO...carbon monoxide; PM₁₀...particulate matter, PM₁₀; PM_{2.5}...particulate matter, PM_{2.5}; SO₂... sulfur dioxide "AvgPer" = averaging period. 1hr = 1 hour, etc. annual = annual "Standard" = air quality standard. PSD = PSD Increment Class II, NAAQS = NAAQS		
	File name (or folder and file name)	Pollutant(s)	Purpose (ROI/SIA, cumulative, culpability analysis, other)
	OLAM_NO2 SIL	NO ₂	ROI/SIA
	OLAM_CO SIL	CO	ROI/SIA
	OLAM_PM2.5 SIL	PM _{2.5}	ROI/SIA
	OLAM_PM10 SIL	PM ₁₀	ROI/SIA
	OLAM_SO2 SIL	SO ₂	ROI/SIA
	OLAM_NO2 1-hr NAAQS	NO ₂	Cumulative—1hr – NAAQS
	OLAM_NO2 Annual NAAQS	NO ₂	Cumulative—Annual – NAAQS
	OLAM_NO2 Annual PSD	PM _{2.5}	Cumulative—Annual – PSD Inc. Class II
	OLAM_PM2.5 Annual	PM _{2.5}	Cumulative—Annual – NAAQS
	OLAM_PM10 Annual PSD	PM ₁₀	Cumulative—Annual – PSD Inc. Class II
	OLAM_PM10 24-hr PSD	PM ₁₀	Cumulative—24 hr – PSD Inc. Class II
	OLAM_PM10 24-hr NAAQS	PM ₁₀	Cumulative—24 hr – NAAQS

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.	Yes ☐	No ☒
---	--	------------------------------	--

	Was preconstruction monitoring done (see 20.2.74.306 NMAC and PSD Preapplication Guidance on the AQB website)?		
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.		
	N/A		
4	Describe the additional impacts analysis required at 20.2.74.304 NMAC.		
	N/A		
5	If required, have ozone and secondary PM2.5 ambient impacts analyses been completed? If so describe below.	Yes ☐	No ☒
	N/A		

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 ☒
	N/A - no culpability analysis was performed.				

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 Concentratio n (µg/m3)	Modeled Concentratio n with Surrounding Sources (µg/m3)	Secondary PM (µg/m3)	Background Concentratio n (µg/m3)	Cumulative Concentratio n (µg/m3)	Value of Standard (µg/m3)	Percent of Standard	Location		
								UTM E (m)	UTM N (m)	Elevatio n (ft)
CO 8-hr SIL	15.20	-	-	-	15.20	500	3.04%	330502.0	3575438.7	1185.58
CO 1-hr SIL	32.38	-	-	-	32.38	2000	1.62%	330442.3	3575701.4	1185.79
NO ₂ annual SIL	2.21	-	-	-	2.21	1	Significant	330484.0	3575611.3	1186.20
NO ₂ 24-hr SIL	9.54	-	-	-	9.54	5	Significant	330485.4	3575726.8	1185.75
NO ₂ 1hr SIL	34.69	-	-	-	34.69	7.52	Significant	330442.3	3575701.4	1185.79
PM _{2.5} annual SIL	0.28	-	-	-	0.28	0.2	Significant	330499.6	3575513.6	1185.8
PM _{2.5} 24-hr SIL	1.198	-	-	-	1.198	1.2	99.9%	330499.4	3575477.4	1185.77
PM ₁₀ annual SIL	1.01	-	-	-	1.01	1	Significant	330499.6	3575513.6	1185.8
PM ₁₀ 24-hr SIL	5.83	-	-	-	5.83	5	Significant	330499.4	3575477.4	1185.77
SO ₂ annual SIL	0.13	-	-	-	0.13	1	13.49%	330484.0	3575611.3	1186.2

Pollutant, Time Period and Standard	Modeled Facility Concentratio n (µg/m3)	Modeled Concentratio n with Surrounding Sources (µg/m3)	Secondary PM (µg/m3)	Background Concentratio n (µg/m3)	Cumulative Concentratio n (µg/m3)	Value of Standard (µg/m3)	Percent of Standard	Location		
								UTM E (m)	UTM N (m)	Elevatio n (ft)
SO ₂ 24-hr SIL	0.58	-	-	-	0.58	5	11.65%	330485.4	3575726.8	1185.75
SO ₂ 3-hr SIL	1.58	-	-	-	1.58	25	6.33%	330463.8	3575714.1	1185.79
SO ₂ 1-hr SIL	2.12	-	-	-	2.12	7.8	27.17%	330442.3	3575701.4	1185.79
NO ₂ Annual PSD Class II Increment	8.00	-	-	10.1	18.10	25	72.4%	330492	3575588	3891.04
NO ₂ Annual NMAAQs	9.38	-	-	10.1	19.48	94.02	20.7%	330496	3575575	3890.65
NO ₂ 1-hr NAAQs	139.43	140.32	-	-	140.32	188.03	74.6%	330677	3575433	3889.53
PM _{2.5} Annual NAAQs	1.13	2.36	-	5.2	7.56	9	84.0%	330396	3575591	3892.45
PM ₁₀ Annual PSD	1.10	4.57	-	-	4.57	17	26.9%	330500	3575514	3890.42
PM ₁₀ 24-hr NAAQs	9.69	26.39	-	99.3	125.69	150	83.8%	330496	3575491	3890.32
PM ₁₀ 24-hr PSD	5.96	15.78	-	-	15.78	30	52.6%	330499	3575478	3890.32

16-X: Summary/conclusions

	A statement that modeling requirements have been satisfied and that the permit can be issued.
1	OLAM West Coast, Inc. has demonstrated that the proposed changes to NSR Permit 1744M4R1 would neither cause nor contribute to an exceedance of the standards for CO, NO ₂ , PM _{2.5} , PM ₁₀ , and SO ₂ .

GCP-5 Permit Limits

III.G. OTHER EMISSIONS LIMITATIONS

1. The annual emissions from the permitted Facility, including fugitive sources of emissions, shall not exceed the emissions limitations in Table III.G.1 – Total Annual Emission Limitations. [20.2.70 NMAC]

Table III.G.1 Total Annual Emission Limitations

Pollutant	Emissions Limitation
Nitrogen Oxides (NO _x)	95 tons per year
Carbon Monoxide (CO)	95 tons per year
Volatile Organic Compounds (VOCs)	95 tons per year
Total Suspended Particulate (TSP)	95 tons per year
Sulfur Dioxide (SO ₂)	50 tons per year
Any one (1) Hazardous Air Pollutant (HAP)	8 tons per year
Sum of all Hazardous Air Pollutants (HAPs)	23 tons per year

For co-located plants, if the plant and the co-located source 1) belong to the same "major group" (i.e., which have the same first two digit code) as described in the Standard Industrial Classification Manual, 1972, as amended by the 1977 Supplement; 2) are under the control of the same person (or persons under common control); and 3) are located on one or more contiguous or adjacent properties, then the total emissions from the co-located plant and source shall not exceed the emissions limitations in this table. [40 CFR 52.21(b)(6)] These limits ensure that the plant will not be a major source under 20.2.70 NMAC.

Original Surrounding Source Emission Rates

AQB Source ID	PM ₁₀ (lb/hr)	PM _{2.5} (lb/hr)
151@1	21.69	21.69
1947@1	21.69	21.69

Modified ABQ Source Emission Rates

AQB Source ID	PM ₃₀ : PM ₁₀ Ratio ^{1,2}	PM ₃₀ : PM _{2.5} Ratio ^{1,2}	PM ₁₀ (lb/hr) ³	PM _{2.5} (lb/hr) ³
151@1	2.11	13.96	10.26	1.55
1947@1			10.26	1.55

¹ Assumes TSP = PM₃₀

² Ratio based on particle size multiplier from AP-42 Chapter 13.2.4

³ Modified Emission Rates (lb/hr) = Original Emission Rates (lb/hr) / Ratio (PM₃₀ : PM₁₀ / PM₃₀ : PM_{2.5})

AP-42 Chapter 13.2.4 Aggregate Handling and Storage Piles

The particle size multiplier in the equation, k, varies with aerodynamic particle size range, as follows:

Aerodynamic Particle Size Multiplier (k) For Equation 1			
< 30 µm	< 15 µm	< 10 µm	< 5 µm
0.74	0.48	0.35	0.20
< 2.5 µm			
0.053 ^a			

^a Multiplier for < 2.5 µm taken from Reference 14.

Mail Application To: New Mexico Environment Department Air Quality Bureau New Source Review Unit 1301 Siler Road, Building B Santa Fe, NM 87507-3113 Phone (505) 476-4300 www.nmenv.state.nm.us/aqb	For Department use only: AIRS #: _____ AI #: _____
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Registration Application & Relocation Application for:

General Construction Permit GCP-5

For Concrete Batch Plants

(Locating outside of Bernalillo County and Tribal Communities)

- Acknowledgement:**
- ☒ I am submitting this form for an initial GCP-5 registration.
 - ☐ I am submitting this form for relocation of equipment under GCP-5 Permit No. _____.
 A complete form is required for all relocations. For relocation, response to questions with asterisks {*} and section IX {attachment D.2} do not need to be provided; sections VII, VIII, and IX {attachment A} are not required unless equipment has changed since the last submitted list. Posting of public notice is required.
 - ☒ I acknowledge that a pre-application meeting is available to me upon request.
 - ☒ Permit or relocation fee enclosed, Check No.: 3287 [Required] (amounts differ for initial registrations, relocations, & small business). The current value of a fee point can be found at: <http://www.nmenv.state.nm.us/aqb/forms/fee-cpi-adjustment-method.pdf>
 - ☒ I have sent a copy of this application to the nearest Department Field Office (required for initial registrations only). See _____ for addresses.
 - ☒ I have initiated the public notice required by Condition ILB.1 of GCP-5 (required for initial registrations only).
 - ☒ This facility meets the applicable requirements in 20.2.75 NMAC to register as a Small Business.

This facility is a ☒ Truck Mix ☐ Central Mix ☐ Other (specify): _____

I Company Information		
1	a) Company name: <u>Rand R Concrete INC.</u>	b) Date application notarized: <u>12/1/08</u>
2	a) Facility name: <u>Rand R Concrete INC.</u>	*b) SIC code (4 digits): <u>3273</u>
3	Company mailing address: <u>1860 Copper Loop Las Cruces, New Mexico 88007</u>	
4	a) Contact person: <u>Linda Ortiz</u>	b) Title: <u>Office Manager</u>
5	a) Phone No: <u>575-525-0380</u>	b) Fax No: <u>575-647-0427</u> c) e-mail: <u>linda.yacurra@yahoo.com</u>
6	Will this facility operate in conjunction with other air regulated parties on the same property? ☒ No ☐ Yes If yes, what is the name and permit number (if known) of the other facility?	
II Applicability		
1*	Is your facility listed under a NESHAP or MACT?	☒ No ☐ Yes
2	Will your facility process radioactive materials?	☒ No ☐ Yes
3	Will your facility process materials that include any listed Hazardous Air Pollutants (HAPs)?	☒ No ☐ Yes

4	Will your facility process asbestos tailings, or asbestos containing waste materials?	☒ No ☐ Yes
5	Is your facility subject to 20.2.72 NMAC, Subpart IV, <i>Permitting for Toxic Air Pollutants</i> ?	☒ No ☐ Yes
6	Will this facility be located less than three (3) miles from a Class I (Wilderness) area? See AQB Modeling website for a map of Class I areas at: http://www.nmenv.state.nm.us/aqb/modeling/class1areas.html	☒ No ☐ Yes
7	Will this facility use any fuels other than natural gas, liquefied petroleum gas (LPG)/propane, gasoline, and #2 diesel fuel with a sulfur content greater than 0.05% by weight?	☒ No ☐ Yes
If you answered <i>Yes</i> to any of questions 1-7, your facility does not qualify for this general construction permit. You need to submit an application for a regular permit under 20 NMAC 2.72 <i>Construction Permits</i> .		
8	Will your facility meet the location requirements as described in Sections III.C. and III.E. of this general construction permit?	☐ No ☒ Yes
9	Is your facility's primary purpose to produce concrete and concrete products per Condition I.A.1 of this general construction permit?	☐ No ☒ Yes
10	Is your facility's production rate less than or equal to 2400 yards of concrete per day (YPD) as required by Condition III.A.4. of this General Construction Permit?	☐ No ☒ Yes
11	Does your facility include any combination of the Emissions Units listed in Section I.A.3. of the general construction permit, and no others?	☐ No ☒ Yes
12	Can your facility comply with all of the applicable state and federal regulations listed in Section III.B. of the general construction permit?	☐ No ☒ Yes
13	Will the perimeter of the Area of Operations of your facility be located more than one-quarter mile (1/4) from an existing recreation area, private residence, office building, school, or other occupied structure? OR, if your facility does not meet this setback, will the haul road fugitive emissions meet the control requirements as described in Condition III.F.10?	☐ No ☒ Yes
14	If you plan to co-locate this facility with an asphalt facility or a crushing facility, will your facility comply with the location requirements as described in Section III.E. - <i>Co-Locations</i> of this general construction permit? If this facility is not co-located, check "Yes".	☐ No ☒ Yes
15	Will the minimum distance between any emission source of the permitted Facility and the perimeter of the Restricted Area (except where the haul road crosses the Restricted Area perimeter) be at least 13 meters (14 yards)?	☐ No ☒ Yes
16	Will the haul road control measures meet or exceed the requirements as described in Section III.F of this general construction permit?	☐ No ☒ Yes
If you answered <i>NO</i> to any of questions 8-18, your facility does not qualify for the general construction permit. You need to submit an application for an individual permit under 20.2.72 NMAC <i>Construction Permits</i> .		

III Current Facility Status

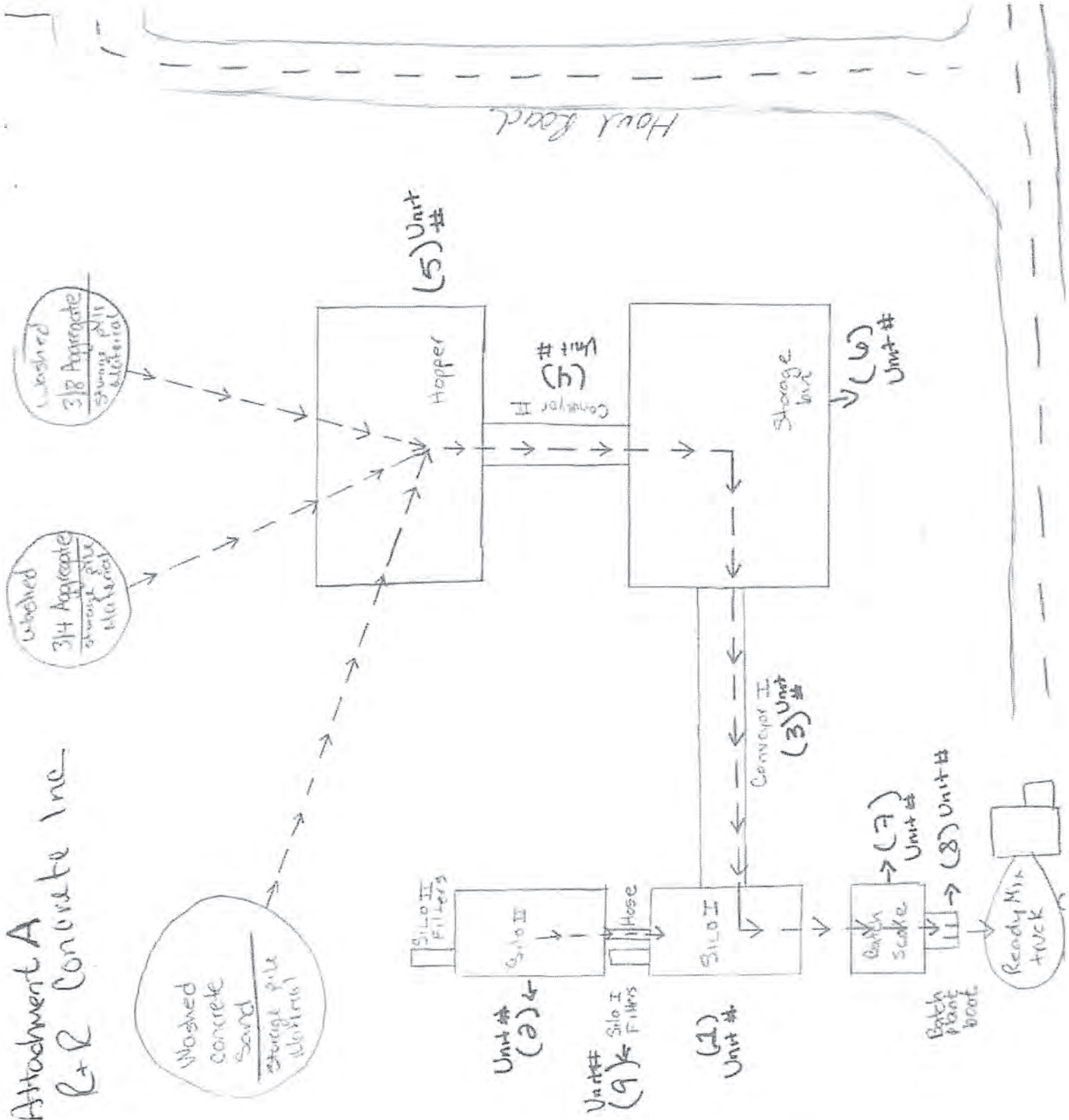
1*	Has this facility previously been issued a general construction permit? ☐ Yes ☒ No	If yes, the registration No. is:
2*	Has this facility already been constructed? ☒ Yes ☐ No	If yes, is it currently operating in New Mexico? ☒ Yes ☐ No
3*	Does this facility have a 20.2.72.200.A (or B) NMAC construction permit or a 20.2.73 NMAC Notice of Intent (NOI)? ☒ Yes ☐ No	If yes, the permit (or NOI) #. and whether the permit will remain active or not: <u>App# 1995</u>
4*	Is this application in response to a Notice of Violation (NOV)? ☒ Yes ☐ No If so, provide current permit #:	If yes, NOV date: <u>Aug 13, 2008</u> NOV Tracking No. <u>RRC-0157-0801</u>
5	This Facility is submitting this application as a Small Business and will operate under the small business product limitation in the GCP, Section II.D.2 - <i>Fees</i> . ☒ Yes ☐ No	
6	This Facility will operate as a Small Business under Condition II.D. I understand additional reporting requirements are necessary prior to operating over the HP and TPY limits set in condition II.D.2, and as required in Condition IV.C.1.b. ☒ Yes ☐ No	

IV Facility Location Information

1	a) Section: <u>14</u>	b) Range: <u>1E</u>	c) Township: <u>235</u>	d) County: <u>Dona Ana</u>	e) Elevation (ft): <u>4,000ft</u>
2	a) UTM Zone: ☐ 12 or ☒ 13	b) UTM E (to nearest 0.01 km): <u>329771</u>	c) UTM N (to nearest 0.01 km): <u>3575525</u>		
	d) Specify Easting and Northing Coordinates as NAD 27: _____ or NAD 83: <u>83</u>				
AND	Latitude (deg., min., sec.): <u>32° 18' 13.0" N</u> Longitude (deg., min., sec.): <u>106° 48' 29.0" W</u>				
3	Name and zip code of nearest New Mexico town and/or tribal community: <u>88007</u>				
4	Detailed Driving Instructions including direction and distance from nearest NM town and/or tribal community (attach a road map if necessary). If there is no street address, provide public road mileage marker: <u>I-10 E, Exit 139 (NM292N/Motel Blvd); merge onto S. Motel Blvd (0.4 mi); turn right onto W. Hadley Ave (0.2 mi); turn right onto Brass Way (0.1 mi); turn right onto Copper Loop (0.2 mi); End at 1860 Copper Loop.</u>				

5	Direction and distance to the nearest occupied structure from the perimeter of the Area of Operations: Start out going South on Westgate St towards Westgate Ct; turn left onto W. Amador Ave/NM-342 E. (0.4 mi); turn left onto N. 7th St (0.3 mi); turn left on Copper Loop (0.1 mi) end at 1860 Copper Loop) 216.37 ft *Bus #1 is closest, but there is a fence between B&E and Bus #1 On Attachment C (page 6), required map, indicate (circle) all residences within 1/4 mile of area of operations.	
6	Status of land at which the facility is to be located (check one): ☒ Private ☐ Indian/Pueblo ☐ Government	
7	Name and county of the nearest Class I Area and its direction from the facility Gila Wilderness Grant County	
8	Shortest distance from the facility to the boundary of the nearest Class I Area (to the nearest 1 km): 120.05 km	
V Initial Operating Schedule		
1	Month and year of anticipated construction of the new or modified facility: Nov 1999 *facility was shut down	
2	Month and year of anticipated completion date at this proposed site: this summer because we could not get air permit as fast as we thought. To avoid more fees	
VI Other Facility Information		
1	Maximum proposed production 400 yards/day	2 Total miles of haul road (one way) .25 miles
3	Maximum proposed production 100,000 yards/year	4 Estimated Number of Haul truck trips/day (round trip) 10 trips/day
5	Area of disturbed earth 2.13 acres	6 Area of storage pile & operations 2.0 acres
7	Amount of area with restricted public access (in acres) and the methods used to restrict public access: Fencing; 2.13 acres	
8	Describe the control measures that will be used on haul roads to meet the fugitive emission requirements described in Section III.F. of this General Construction Permit: Haul roads and aggregate stock piles shall be contained within a three wall bunker will use only washed sand, put 15% of mix water into mixer trucks before adding dry batch ingredients. Also, a surfactant will be used on all haulroads to control emissions and will watered as necessary	
9	Provide the manufacturer's recommended pressure drop across the filter(s), as required by Condition II.C.5.h: 2"	
10	Provide a preliminary operational plan(s) defining the measures to mitigate source emissions during: 1) Facility malfunctions, start up, shutdown, scheduled maintenance as defined in 20.2.7 NMAC, and 2) weather conditions that would cause an exceedance of the visible emission requirement in Section III.A.6. of the permit. Control systems are always on at start up, shutdown, malfunctions, and scheduled maintenance, even under harsh conditions, there is no exceedance in visible emission	

Attachment A L+R Concrete Inc.



Attachment B

R+R Concrete Inc



- 1st ● Silo to Fence. 45.15 ft.
- 2nd ● Silo to Haul road. 510.04 ft.
- 3rd ● Silo to storage pile #1 98.03 ft
- 4th ● Silo to storage pile #2 183.23 ft.
- 5th ● Silo to storage pile #3. 204.81 ft.
- 6th ○ Ready Mix Trucks.

Storage Pile (Material) #1, #2, #3 will be 42. ft. away from fence.

Attachment. C.

P+R Concrete Inc.



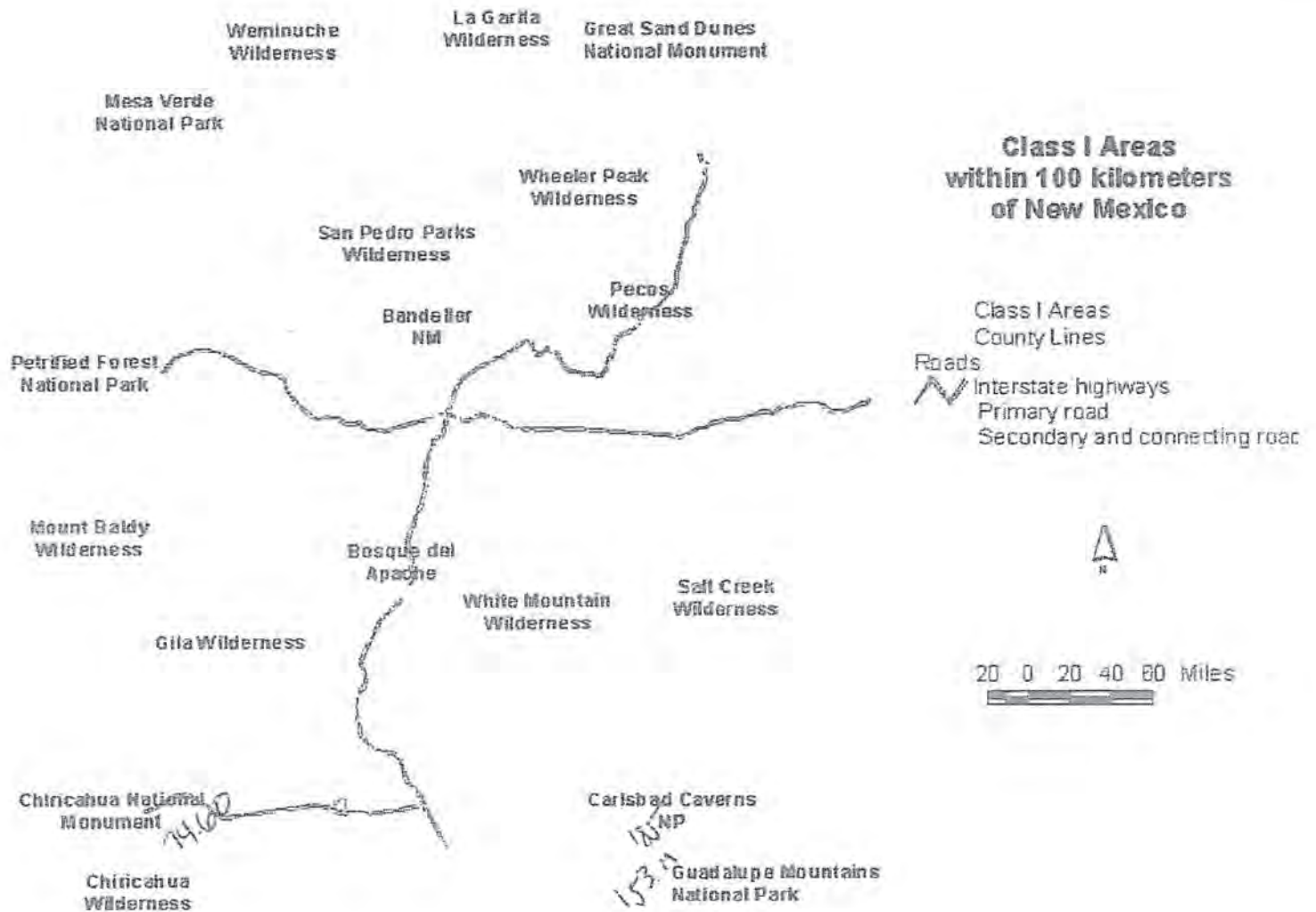


Figure 1

Appendix D

www.lcsun-news.com

LAS CRUCES SUN-NEWS

PROOF OF PUBLICATION

Lou Hendren, being duly sworn, deposes and says that he is the Classified Manager of the Las Cruces Sun-News, a newspaper published daily in the county of Dona Ana, State of New Mexico; that the notice 41139 is an exact duplicate of the notice that was published once a week/day in regular and entire issue of said newspaper and not in any supplement thereof for 1 consecutive week(s)/day(s), the first publication was in the issue dated November 22, 2008 and the last publication was November 22, 2008.

Despondent further states this newspaper is duly qualified to publish legal notice or advertisements within the meaning of Sec. Chapter 167, Laws of 1937.

Signed

[Signature]
Classified Manager
Official Position

STATE OF NEW MEXICO

ss.

County of Dona Ana

Subscribed and sworn before me this

1 day of December, 2008

[Signature]
Notary Public in and for

Dona Ana County, New Mexico

September 22, 2012
My Term Expires



NOTICE OF AIR QUALITY PERMIT APPLICATION

R & R Concrete announces its intent to apply to the New Mexico Environment Department for an air quality permit for the location of its concrete batch plant. The expected date of application submittal to the Air Quality Bureau is November 15, 2008. This notice is a requirement according to New Mexico air quality regulations.

The Exact location of the facility is 1860 Copper Loop, Las Cruces, NM 88007 in Dona Ana County.

This facility estimates its maximum quantities of any regulated air contaminant to be:

Tons per year

- | | | |
|----|---|----|
| 1. | Total Suspended Particulates | 95 |
| 2. | Nitrogen Oxides (No2) | 95 |
| 3. | Carbon Monoxide (Co) | 95 |
| 4. | Volatile Organic Compounds (VOC) | 95 |
| 5. | Sulfur Dioxide (So2) | 50 |
| 6. | Any one (1) Hazardous Air Pollutant (HAP) | 8 |
| 7. | Sum of all Hazardous Air Pollutants (HAPS) | 23 |

www.lcsun-news.com

LAS CRUCES SUN-NEWS

The facility may operate 24 hours / day
but may not exceed 2400 cubic
yards/day.

The owner and / or operator of the plant
is:

Rogelio Juarez and Rito Casillas, R & R
Concrete, 1860 Copper Loop, Las
Cruces, New Mexico 88007./

If you have any questions or comments
about construction or operation of above
facility, and want your comments to be
made as a part of the permit review
process, you must submit your
comments in writing to the address
below:

Program Manager, New Source Review
New Mexico Environment Department
Air Quality Bureau
131 Siler Road, Building B
Santa Fe, New Mexico 87505-3133
(505)476-4300

Other comments and questions may be
submitted verbally.

Please refer to the company name and
site name, as used in this notice or send
copy of this notice along with your
comments, since the Department may
not have received the permit application
at the time of this notice.

Pub No. 41139

Pub Dates: November 22,2008

ATTACHMENT E
for R & R Concrete

The method in which we limit public access to the restricted area is through fencing. Also, the immediate restricted area is limited to public access by a notice posted 100 ft. of the actual ready mix plant cautioning the public of the dangers and prohibiting access to that part of the property.

X Certification

Company Name: R3R Concrete

I, R.T., hereby certify that the information and data submitted in this application are true and as accurate as possible, to the best of my knowledge and professional expertise and experience.

Signed this 1st day of Dec, 2008, upon my oath or affirmation, before a notary of the State of NM.

Rogelio A. Juarez
Signature

12-1-08
Date

Rogelio A. Juarez
Printed Name

President
Title

Scribed and sworn before me on this 1st day of December, 2008.

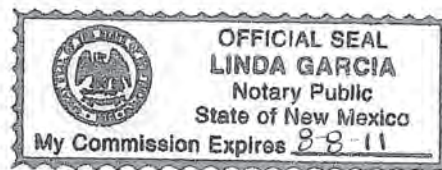
My authorization as a notary of the State of New Mexico expires on the

8th day of August, 2008.

Linda Garcia
Notary's Signature

12-1-08
Date

Linda Garcia AKA Linda Ortiz
Notary's Printed Name married name



Certification
General Posting of Notices
General Construction Permits (GCPs)

I, Rogelio Juarez, the undersigned, certify that on 12/22/08 I posted a true and correct copy of the attached Public Notice in a publicly accessible and conspicuous place at the facility entrance of the property on which the facility is, or is proposed to be, located.

Signed this 1st day of December, 2008.

Rogelio Juarez
Signature

12-01-08
Date

Rogelio Juarez Applicant
Printed Name Title {APPLICANT OR RELATIONSHIP TO APPLICANT}

Mail Application To: New Mexico Environment Department Air Quality Bureau 2048 Galisteo Santa Fe, NM 87505 Phone (505) 827-1494 http://www.nmenv.state.nm.us		Registration No. _____ AIRS No. _____ For NMED use only
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Application for Air Quality General Construction Permit GCP-5

Concrete Batch Plants

1445m1

(Locating outside of Bernalillo County and Tribal Communities)

Acknowledgement:

- ☒ I acknowledge that a pre-application meeting is available to me upon request
- ☒ Permit fee enclosed, Check No.: _01681477 [Required] (see instructions for amount)
- ☒ I have sent a copy of this application to the nearest Department field office
- ☒ I have initiated the public notice that is required for GCP-5
- ☐ This facility meets the applicable requirements to register as a Small Business

I General Information			
1	a) Company Name: Cemex Construction Materials, L.P.	b) Date Application Notarized: June 29, 2007	
2	a) Facility's Site Name: Westgate Concrete Batch Plant	b) SIC code (4 digits): 3273	
3	Company Mailing Address: #1 McKelligon Canyon Road		
4	a) Contact Person: Octavio Holguin, Jr.	b) Title: Environmental Manager	
5	a) Phone Number : (915) 564-1653	b) Fax No : 915-564-3680	c) E-mail: octavio.holguinjr@cemex.com
6	a) Will this plant operate in conjunction with a hot mix asphalt facility and/or an aggregate processing facility within the same property boundary? ☒ No ☐ Yes b) If yes, what is the name and permit number of the other facility?		

II Applicability	
If you answer Yes to any questions 1-4 below, your facility does not qualify for the general construction permit. You need to submit an application for an individual permit under 20.2.72 NMAC – <i>Construction Permits</i> .	
1	Is your facility subject to a National Emissions Standard for Hazardous Air Pollutants (NESHAP) or Maximum Available Control Technology (MACT)? ☒ No ☐ Yes
2	Will your facility be located less than three (3) miles from a Class I (Wilderness, National Park) area? See Map – attached ☒ No ☐ Yes
3	Will the haul road (s) be greater than one (1) mile in length? ☒ No ☐ Yes
4	Will your facility use any fuel other than gasoline, pipeline quality natural gas, liquefied petroleum gas (LPG)/propane, and /or #2 diesel fuel with a sulfur content equal to or less than 0.05 % by weight to fuel engines and heaters ? ☒ No ☐ Yes

If you answer **NO** to any questions 5-11 below, your facility **does not** qualify for the GCP-5. You need to submit an application for an individual permit under 20.2.72 NMAC *Construction Permits*.

5	Is your facility's primary purpose to produce concrete and concrete products using any combination of the equipment listed in Section I.A.3 of the GCP-5?	☐ No ☒ Yes
6	Is your facility's production rate less than or equal to 2400 yards of concrete per day (YPD)?	☐ No ☒ Yes
7	Can your facility comply with all of the applicable state and federal regulations listed in Section III.B – <i>Applicable Regulations</i> of the GCP-5?	☐ No ☒ Yes
8	Will your facility meet the location requirements as described in Sections III.C – <i>Siting Restrictions</i> of the GCP-5?	☐ No ☒ Yes
9	Will the perimeter of the Area of Operations of your facility be located at least more than one-quarter mile (1/4) from an existing recreation area, private residence, office building, schoolyard, or other occupied structure? If your facility does not meet this setback, will the haul road fugitive emissions meet the control requirements as described in III.F.10?	☒ No ☐ Yes ☐ No ☒ Yes
10	If you plan to co-locate this facility with an asphalt facility or a crushing facility, will your facility comply with the location requirements as described in Section III.E – <i>Co-Locations</i> of this general construction permit? If this Facility is not co-located, check "Yes".	☐ No ☒ Yes
11	Will the haul road control measures meet the requirements as described in Paragraph III.F – <i>Emissions Restrictions and Conditions</i> 9, 10 & 11 of GCP-5?	☐ No ☒ Yes

III Initial Facility Status

1	a) Has this facility previously been issued a GCP-5? ☐ Yes ☒ No		b) If yes, the registration no. is:
2	a) Has this facility already been constructed? ☒ Yes ☐ No	b) If yes, is it currently operating in New Mexico? ☒ Yes ☐ No	
3	a) Does this facility currently have a regular construction permit (Subsection A or B of 20.2.72.200 NMAC)? ☐ Yes ☒ No	b) If yes, list the permit No : c) Will the permit remain active? ☐ Yes ☐ No	
4	a) Is this application in response to a Notice of Violation (NOV)? ☐ Yes ☒ No	b) If yes, NOV date:	c) NOV Tracking No.
5	a) This Facility is submitting this application as a Small Business and will operate under the 130,000 YPY small business limitation condition in Section II.D.2 – <i>Fees</i> ☐ Yes ☒ No		
6	a) This Facility will operate as a Small Facility under condition I.E – <i>Large and Small Facilities</i> . I understand that additional reporting requirements are necessary prior to operating over the 360 cubic yards of concrete per day limit. ☐ Yes ☒ No		

IV Facility Location Information

1	a) Section: 23 4	b) Range: R1E	c) Township: 23S	d) County: Dona Ana	e) Elevation (ft): 3894
2	a) UTM Zone: ☐ 12 or ☒ 13	b) UTMH (record to one hundredth of a km): 329621		c) UTMV (record to one hundredth of a km): 3575456	
	d) Specify Easting and Northing Coordinates as NAD – 27 : or NAD - 83 : x				
AND	Latitude (deg., min., sec.): 32° 18' 10" N		Longitude (deg., min., sec.): 106° 48' 34" W		
3	Name and zip code of nearest New Mexico town and/or tribal community: Las Cruces, 88005-4180				
4	Detailed driving instructions including direction and distance from nearest NM town and/or tribal community (attach a road map if necessary): From Dona Ana County Commission, 180 W Amador Ave, Las Cruces, NM go WEST on W AMADOR AVE / NM-342 W toward S WATER ST. 1.7 miles, Turn RIGHT onto WESTGATE ST. 0.1 miles, End at 181 Westgate St. Las Cruces, NM 88005-4180, US				
5	The direction and distance from the perimeter of the area of operation to the nearest occupied structure. 0.14 miles N 15° W				
6	Status of land at which the facility is to be located (check one): ☒ Private ☐ Indian/Pueblo ☐ Government				
7	Name and county of the nearest Class I area and its direction to the facility: White Mountain Wilderness, Lincoln County, NM 93 miles NE				
8	Shortest distance from the facility boundary to the boundary of the nearest Class I area (record to the nearest km): 93 Miles				

V Initial Operating Schedule	
1	Month and year of anticipated construction of new or modified facility: Currently operating under NOI
2	Month and year of anticipated startup date for the facility at this proposed site: Currently operating under NOI

VI Other Facility Information				
1	a) Maximum proposed production	2400 yards/day	876,000 yards/year	b) Total miles of haul road (one way) miles: 0.19
2	a) Area of storage pile & operations acres: 4.73 acres			b) Estimated Number of Haul truck trips per day (round trip) trips/day: 40 trips/day
5	a) Area of disturbed earth in acres: 8.35		b) Area with restricted public access in acres: 8.35 acres	
6	a) Method(s) used to restrict public access: The only road into the facility is controlled by requiring all visitors to check into the office before entering the facility.			
7	Describe the control measures used to meet the fugitive emission requirements on haul roads as described in Section III.F- <i>Emissions Restrictions and Conditions</i> 9 & 10 of this General Construction Permit: The distance from the perimeter of the Area of Operations to a private residence is less than 1/4 mile. The haul road fugitive emissions will be controlled by a surfactant at the unpaved portions of the haul road, and sweeping traffic areas (within 25 meters of the area of operations perimeter) on the paved portion of the haul road. A wheel washer will be used the truck exits.			
8	Provide a preliminary operational plan (s) defining the measures to mitigate source emissions during; 1) Facility malfunctions, startup, shutdown or scheduled maintenance as defined in 20.2.7.NMAC All filtration systems are routinely maintained to ensure the bags within the silo filters and central baghouse are free of excess particulate matter which can impede the filtration. Bags are inspected for tears and rips. Old bags within the filters are routinely replaced. During a facility malfunction, start up or shut down the filtration systems will be independently activated to ensure excess particulate material is not emitted to the atmosphere. In the event that a filtration system shows excess emissions, the facility will be shut down until repairs can be accomplished to the filtration system. In the event excess emissions escape to the atmosphere, the New Mexico Environment Department will be notified within 24 hours of the incident.			
9	Provide a preliminary operational plan (s) defining the measures to mitigate source emissions during; 2) Weather conditions that would cause an exceedance of the visible emission requirement in Subsection III.A.6 of the permit. The stockpiles are watered normally to saturation. High velocity winds usually do not generate particulate emissions from the stockpiles because of the saturated state. In the event, watering of stockpiles cannot be performed, the facility will be shut down until repairs can be performed or until the high velocity winds reach a safe level.			

VII Process Equipment Information (use additional sheets if necessary)

Unit Number	Component Description (or unit's function)	Manufacturer	Manufacture Date	Model Number	Equipment Size, Maximum Design Capacity
1	Batch plant	Besser	n/a	n/a	10 Yards Capacity and 120 yards per hour
2	Small Cement Silo	n/a	n/a	n/a	55 tons
3	Small Silo Bag House	n/a	n/a	n/a	25 filters
4	Big Cement Silo/Split Silo	n/a	n/a	n/a	120 tons capacity
5	Big Silo Bag House	Besser			42 Filters
6	FlyAsh Silo	n/a	n/a	n/a	70 tons capacity
7	FlyAsh Bag house	Con-E- Co	n/a	Serial # 2113	30 Filters
8	Cement Storage Bin	Buttler	n/a	Moder # 1963 / Serial # 2581BTSMS	125 tons
9	Loader	CAT	n/a	966 CAT	8 tons
10	Water Truck	Kenworth	10/87	T800	5000 Gals
11	Excavator	CAT	n/a	n/a	4 tons
12	Batch House	Built on site	n/a	n/a	10x12 Control House
13	Storage Trailer	FrueHauf	n/a	HPM-308828	48 ft. Trailer
14	Chemical Trailer	Reefer Container	n/a	Serial # NYKU797703-1	48 ft. Trailer
15	Color Storage Trailer	n/a	n/a	Moder # FI060-01	4 / 4000 lbs. Totes inside
16	Portable Trailer	Big-Tex	n/a	n/a	250 lbs. chemical tank
17	2 Grace Chemical Tanks	n/a	n/a	n/a	1500 gals.
18	2 Grace Chemical Tanks	n/a	n/a	n/a	1000 gals.
19	Water Chiller	Carrier	n/a	Serial # 3001F99337	
20	2 Water Tanks	n/a	n/a	n/a	10,000 gals capacity each tank
21	Aggregate Bins	Besser	n/a	n/a	170 tons
22	Big Conveyor Belt	n/a	n/a	n/a	200 ft. long
23	Small Conveyor Belt	n/a	n/a	n/a	45ft. long
24	Reclaimer	Eagle Iron Works		Moder# BM-D12453 / Serial # 14952	
25	Blower	TUTHILL		Model # 4009-17T3 / Serial # 1017830404	
26	Dust Collector	n/a	n/a	n/a	Now working
	Main Office				
	3 Bay Shop				

VIII Storage Tank Information (Note: this data will be used to determine 40 CFR 60 Subpart KB Applicability) Use additional sheets if necessary. Please include silos in this information.

Tank No.	Materials Stored	Date Manufactured (MM/DD/YY)	Capacity (M ³ or gal)	Diameter (M)	Height (M)	True Vapor Pressure (kPa)	Annual Through-put (M ³ or gal)

One 10,000 gallon diesel tank and a 250 gallon propane tank are on-site, however these tanks are associated with the refueling and water heating for the mixer trucks. No Volatile Organic Liquid Storage Vessels are associated with the concrete batch plant.

IX Required Attachments

The following Attachments are required. Please label each accordingly. A complete application shall include:

- Attachment A A process flow sheet and/or block diagram indicating the individual equipment, all emission points, unit numbers, and types of controls applied to those points. Numbering system should cross reference with Attachment B.
- Attachment B A plot plan drawn to scale, showing the Area of Operations, emissions points by unit number, structures, tanks, and fences of the Restricted Area, and the Property Boundary owned, leased, or under direct control of the applicant and/or owner or operator.
- Attachment C A map such as a 7.5 minute United States Geological Survey (USGS) topographic quadrangle showing the proposed location of the Facility. The map shall also include the following:
- | | |
|---|---|
| The UTM or Longitudinal coordinate system on both axes | An indicator showing which direction is north |
| A minimum radius around the facility of 5km (3.1 miles) | The nearest occupied structure(s) (unless the distance is greater than 3.1 miles) |
| Topographic features of the area | Access and haul roads |
| The name of the map | Facility property boundaries |
| A scale | The area which will be restricted to public access |
- Attachment D Documentation that public notice has been initiated
- | |
|---|
| 1) Include the General Posting of Notice-Certification along with the posted sample. |
| 2a) Include an original or copy of the actual newspaper advertisement. The original or copy of the advertisement must include the header showing the date and newspaper or publication title. OR |
| 2b) Include an affidavit from the newspaper or publication stating that the advertisements were published. The affidavit must include the date of the advertisements' publication. |
- Attachment E Certification by the Plant's owner or operator, or authorized representative before a notary public that all of the information included in the registration form is true and complete to the best of his or her knowledge (see attached copy in Part X of this registration form).

X Certification

Company Name: Cemex Construction Materials, L.P.

I, Octavio Holguin, Jr., hereby certify that the information and data submitted in this application are true and as accurate as possible, to the best of my knowledge and professional expertise and experience.

Signed this 29 day of June, 2007, upon my oath or affirmation, before a notary of the State of Texas.


Signature

6/29/07
Date

Octavio Holguin, Jr.
Printed Name

Environmental Manager
Title

Scribed and sworn before me on this 29th day of June, 2007.

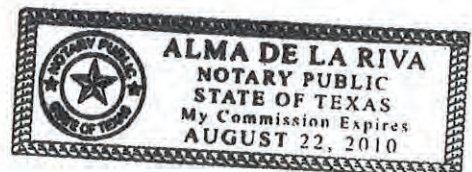
My authorization as a notary of the State of Texas expires on the

22 day of August, 2010


Notary's Signature

6/29/2007
Date

Alma De La Riva
Notary's Printed Name





Westgate Concrete Batch Plant Driving Directions



Company name: Cemex Construction Materials, L.P.	Site Map	Air Quality Permit Application (GCP-5)
Facility name: Westgate Concrete Batch Plant	Driving Directions	For Concrete Batch Plant

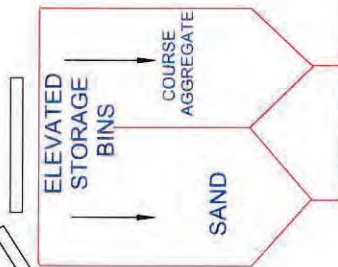
Hot Water Boiler
w/ diesel and propane tanks

TRANSFER TO
ELEVATED
STORAGE BINS

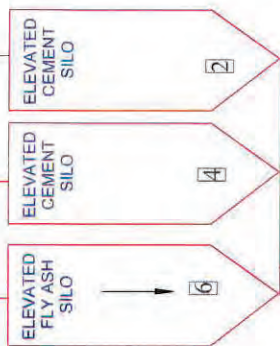
UNLOADING TO ELEVATED STORAGE SILOS

SAND AND AGGREGATE
STOCKPILES

SAND AND AGGREGATE
TRANSFER TO CONVEYOR



PNEUMATIC
TRANSFER TO
STORAGE SILOS



SAND AND AGGREGATE
TRANSPORT TRUCK

CENTRAL
BAGHOUSE

CEMENT WEIGH BATCHER

WATER ADDED

TRANSIT MIX TRUCK LOADING

TRUCK MIXED PRODUCT

ATTACHMENT A
PROCESS FLOW DIAGRAM
EQUIPMENT

Company name: Cemex Construction Materials, L.P.
Facility name: Westgate Concrete Batch Plant

AIR, SOIL AND WATER
ENVIRONMENTAL CONSULTANTS, INC.
PROJECT NO. 06-14

— MATERIAL FLOW NOT TO SCALE
□ EMISSION POINT NUMBER LEGEND:

- 1 Batch plant
- 2 Small Cement Silo
- 3 Small Silo Bag House
- 4 Big Cement Silo/Split Silo
- 5 Big Silo Bag House
- 6 FlyAsh Silo
- 7 FlyAsh Bag house
- 8 Cement Storage Bin
- 9 Loader
- 10 Water Truck
- 11 Excavator
- 12 Batch House
- 13 Storage Trailer
- 14 Chemical Trailer
- 15 Color Storage Trailer
- 16 Portable Trailer
- 17 2 Grace Chemical Tanks
- 18 2 Grace Chemical Tanks
- 19 Water Chiller
- 20 2 Water Tanks
- 21 Aggregate Bins
- 22 Big Conveyor Belt
- 23 Small Conveyor Belt
- 24 Reclaimer
- 25 Blower
- 26 Dust Collector

13-14

15, 16, 17,
18 and 19

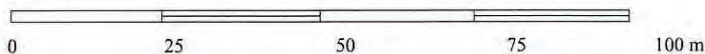
20

12

24



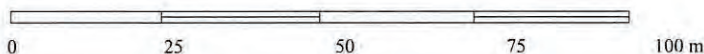
Concrete Batch Plant Operation Area



Company name: Cemex Construction Materials, L.P.
Facility name: Westgate Concrete Batch Plant

Attachment B
Site Map

Air Quality Permit Application (GCP-5)
For Concrete Batch Plant

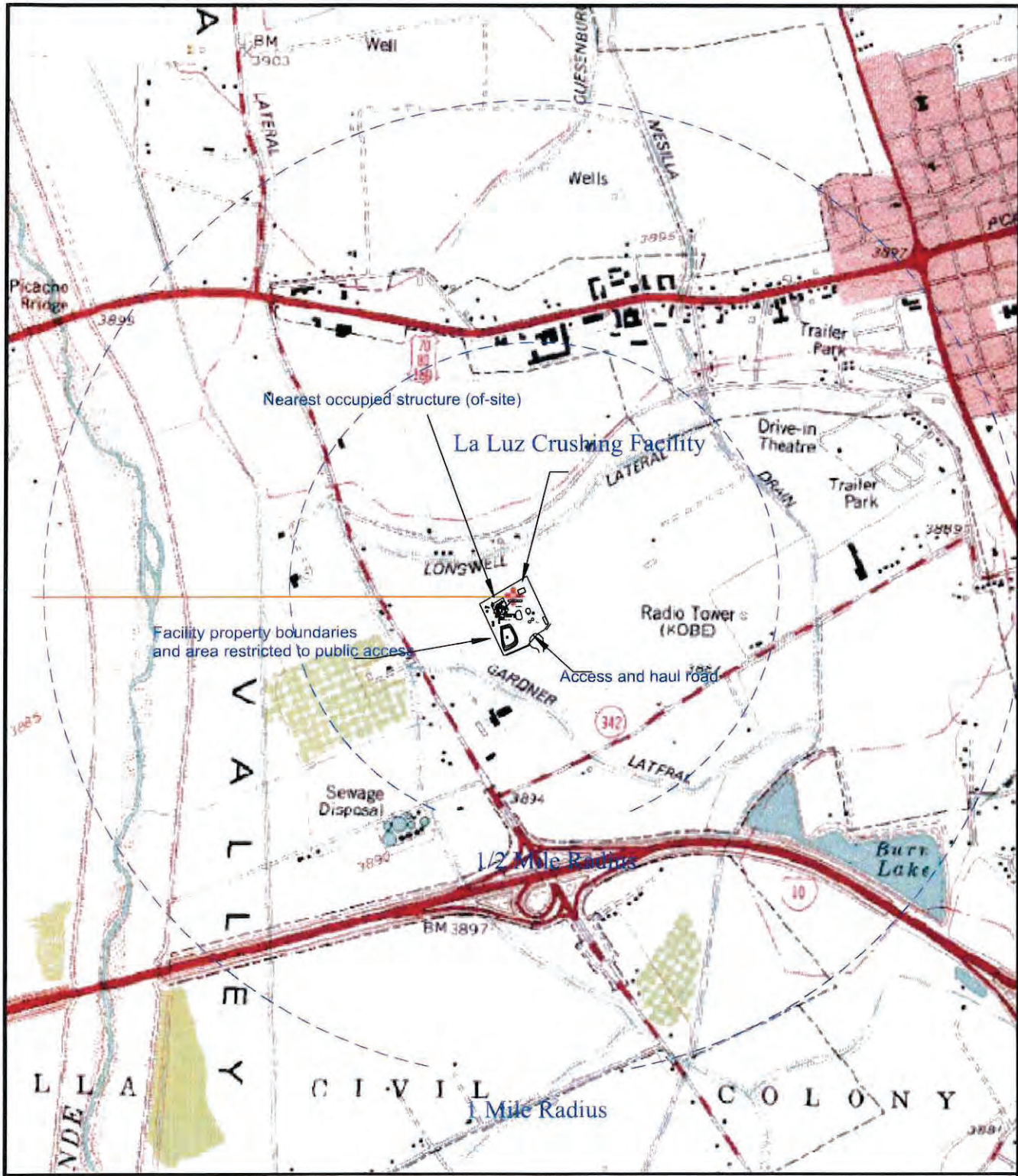


Company name: Cemex Construction Materials, L.P.
Facility name: Westgate Concrete Batch Plant

Attachment B
Site Map
With Haul Roads

Air Quality Permit Application (GCP-5)
For Concrete Batch Plant





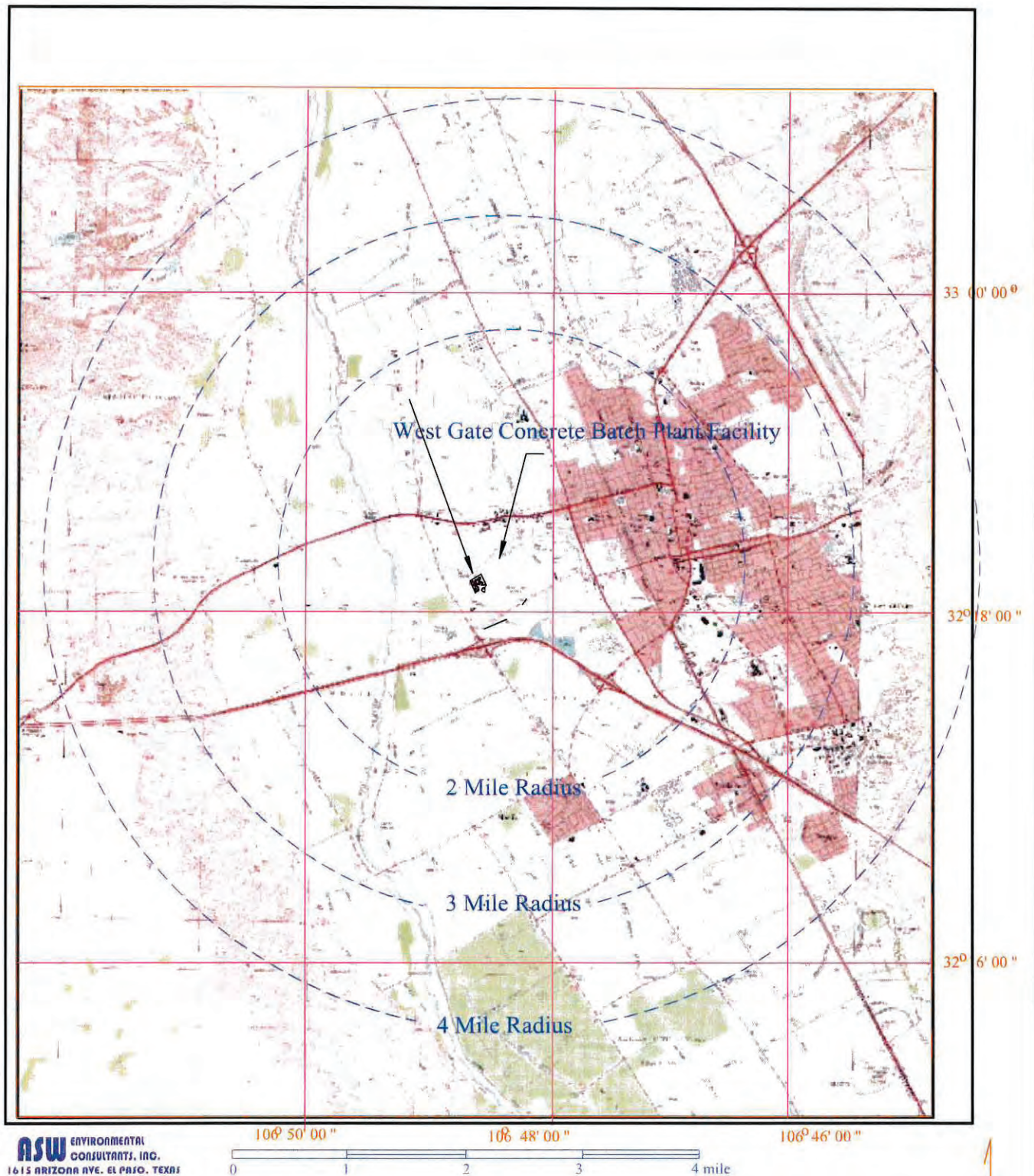
ASW ENVIRONMENTAL
CONSULTANTS, INC.
1615 ARIZONA AVE. EL PASO, TEXAS

0 0.25 0.5 0.75 1 mile

Site Map (1 Mile Radius)

Company name: Cemex Construction Materials, L.P.
Facility name: Westgate Concrete Batch Plant

Application for Air Quality General Construction Permit GCP-5
Concrete Batch Plants



Site Map (4 Mile Radius) Attachment C

Company name: Cemex Construction Materials, L.P. Application for Air Quality General Construction Permit GCP-5
 Facility name: Westgate Concrete Batch Plant Concrete Batch Plants

NOTICE

OF AN AIR QUALITY PERMIT APPLICATION

Recent changes in EPA and the State of New Mexico regulations requires Cemex to submit a permit application for the Westgate Concrete Batch Plant. This permit application is not for a new plant. The concrete batch plant has been in operation for several years in Las Cruces, NM. There is no request to increase production at this plant. Cemex has recently purchased this facility and is working on improving the existing dust control system at the facility. Cemex is committed to positive environmental changes and health and safety of residential neighbors. The expected date of application submittal to the Air Quality Bureau is June 21, 2007 is a requirement according to New Mexico air quality regulations. The location for the Westgate Concrete Batch Plant is 181 Westgate, Las Cruces, New Mexico

This facility estimates its maximum quantities of any regulated air contaminant to be:

	Tons per year
1. Nitrogen Oxides (NO _x),	<u>95</u>
2. Carbon Monoxide (CO),	<u>95</u>
3. Volatile Organic Compounds (VOCs),	<u>95</u>
4. Total Suspended Particulate (TSP),	<u>95</u>
5. Sulfur Dioxide (SO ₂),	<u>50</u>
6. Any one (1) Hazardous Air Pollutant (HAP)	<u>8</u>
7. Sums of all Hazardous Air Pollutants (HAPs)	<u>23</u>

The facility may operate 24 hours/day but may not exceed 2400 cubic yards/day.

The owner and/or operator of the Plant is:

Cemex Construction Materials, L.P.,
#1 McKelligon Canyon Road,
El Paso, Texas 79930.

Questions and comments regarding this notice may be directed to:

Program Manager, Permit Section
New Mexico Environment Department
Air Quality Bureau
2048 Galisteo
Santa Fe, New Mexico 87505
Phone: (505) 827-1494 or 1 800 224-7009 Fax: (505) 827-1523

Daniel Dolce

From: Mustafa, Sufi A., ENV <sufi.mustafa@env.nm.gov>
Sent: Monday, September 30, 2024 1:48 PM
To: Beth Morley
Subject: RE: [EXTERNAL] Modeling Protocol for OLAM Spices and Vegetable Ingredients: NSR 1744-M3-R2

Beth
This modeling protocol is acceptable.
Thank you.

Sufi A. Mustafa, Ph.D.
Manager Air Dispersion Modeling and Emission Inventory Section
New Mexico Environment Department's Air Quality Bureau
Office: (505) 629 6186
sufi.mustafa@state.nm.us
525 Camino de los Marquez
Suite 1
Santa Fe, New Mexico, 87505
<https://www.env.nm.gov/air-quality/>



“Innovation, Science, Collaboration, Compliance”

From: Beth Morley <Beth.Morley@trinityconsultants.com>
Sent: Monday, September 23, 2024 10:08 AM
To: Mustafa, Sufi A., ENV <sufi.mustafa@env.nm.gov>
Cc: Adam Erenstein <AErenstein@trinityconsultants.com>; Christopher Granados <Christopher.Granados@ofi.com>
Subject: [EXTERNAL] Modeling Protocol for OLAM Spices and Vegetable Ingredients: NSR 1744-M3-R2

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Good morning Sufi,

Please find attached the modeling protocol for OLAM West Coast Inc.'s OLAM Spices and Vegetable Ingredients facility (**NSR 1744-M3-R2**). Modeling is being completed as part of a significant revision to the permit.

Please do not hesitate to reach out with any questions you may have.

Regards,

Beth Morley
Associate Consultant

P 505.266.6611
Email: Beth.Morley@Trinityconsultants.com
9400 Holly Avenue NE, Building 3, Suite B, Albuquerque, NM 87122



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AIR DISPERSION MODELING PROTOCOL

NSR Significant Revision Modeling Protocol

OLAM West Coast Inc. OLAM Spices and Vegetables Ingredients

Prepared By:

Adam Erenstein – Principal Consultant

TRINITY CONSULTANTS

9400 Holly Avenue NE
Building 3, Suite B
Albuquerque, NM 87122
(505) 266-6611

September 2024

Project 243201.0063



1. INTRODUCTION

1.1 Purpose of Modeling

OLAM Spices and Vegetable Ingredients (OLAM Spice) manufactures spice and vegetable bulk materials owned by and operated by OLAM West Coast Inc. (OLAM). This facility has three main processes to manufacture these materials—the Proctor Mill, the Other Producers (OP) Mill, and the Blending, Cooking, and Packaging units. The Proctor Mill receives raw spices and strips all trash, stems, and seeds before being divided into two streams for indirect heat drying. The spices exiting the proctor mill are separated for proper classification and the milled and mixed spices are conveyed for storage at the Work in Progress (WIP) Warehouse. The OP Mill receives raw spices. The spices are milled and well-mixed before being conveyed to the WIP Warehouse. Finally, the Blending, Cooking, and Packaging units produce the final product spices by the blending of individual spices stored in the WIP warehouse. These spices are combined using cooking blenders before being passed to the packaging and bagging area to prepare them for delivery to OLAM customers. OLAM Spices is located within Las Cruces, NM city boundaries in Doña Ana County.

OLAM is submitting an application pursuant to 20.2.72.219.D(1)(a) NMAC for significant revision of NSR Permit No. 1744M4R1. The purpose of this revision is: for the addition of one (1) 2.0 MMBtu/h boiler; the replacement of one (1) 8.4 MMBtu/h boiler with a 6.1 MMBtu/h boiler (unit BB-1), one (1) 6.4 MMBtu/h boiler with a 2.0 MMBtu/h boiler (unit BB-4), one (1) 2200 lb/hr Finish Mill with a 8000 lb/hr Finish Mill (unit M-7), and one (1) steam sterilizer (unit SS-2); and the removal of one (1) Cryo Mill (unit M-8), one(1) four seed dryers unit (unit SD1-4), and three (3) boilers (units BB-2, BB-3, BB-5).

OLAM seeks to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS), New Mexico Ambient Air Quality Standards (NMAAQs), and PSD Increment standards as applicable for the following pollutants and averaging periods: NO₂ (1-hour and annual), CO (1-hour and 8-hour), SO₂ (1-hour, 3-hour, 24-hour, and annual), PM_{2.5} (24-hour and annual), and PM₁₀ (24-hour and annual).

1.2 Facility Description and Location

The approximate UTM coordinates of the facility are 330,568 meters East and 3,575,436 meters North with WGS84 datum at an elevation of approximately 3,894 feet above mean sea level.

2. PROPOSED MODELING

2.1 Model Input Options

The latest version of the AERMOD dispersion model (version 23132) will be used for this analysis. The model will be run in regulatory mode with all default options. The ARM2 method will be used to convert NO_x to NO₂. Default minimum and maximum ambient ratios will be utilized.

Table 1 shows the emission sources and stack parameters for the facility including the new units (BB-1, BB-4, BB-7, M-7, SS-2). Please note that emissions and stack parameters may vary throughout the development of this application.

Table 1- Project emission sources and stack parameters to be included in the air dispersion modeling.

Stack Number	Serving Unit Number(s)	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}	Height	Temp	Velocity	Diam.
		lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	ft	F	ft/s	ft
BB-1	BB-1	0.60	0.50	0.034	0.046	0.046	24	240	64.72	1.33
BB-4	BB-4	0.20	0.16	0.011	0.015	0.015	25	240	2.9	0.83
BB-6	BB-6	0.20	0.16	0.011	0.015	0.015	26.58	240	2.9	0.25
9	M-7	-	-	-	0.019	0.0049	10	75	3.16	2.07
12a	SS-2	-	-	-	0.005	0.0012	26.58	75	0.67	2.61
12b	SS-2	-	-	-	0.005	0.0012	26.58	75	0.67	2.61
12c	SS-2	-	-	-	0.005	0.0012	26.58	75	0.67	2.61
12d	SS-2	-	-	-	0.005	0.0012	26.58	75	0.67	2.61

*The stack numbers are estimated and will be updated in the final model.

Table 2- All other facility emission sources and stack parameters to be included in the air dispersion modeling.

Stack Number	Serving Unit Number(s)	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}	Height	Temp	Velocity	Diam.
		lb/hr	lb/hr	lb/hr	lb/hr	lb/hr	ft	F	ft/s	ft
1	M-1	-	-	-	0.0091	0.0023	31	75	3.16	2.07
3	M-3, P-BL	-	-	-	0.027	0.0068	15	75	15.48	0.94
4	C-BL	-	-	-	0.068	0.017	30	75	3.56	1.95
5	Tote Line, F-HP	-	-	-	0.045	0.011	27	75	3.56	1.95
6	M-4, M-5, M-6, Bag Lines (2), Carton Line, Drum Lines (2)	-	-	-	0.11	0.028	26	75	7.11	1.38
7	F-BL	-	-	-	0.029	0.0073	27	75	13.58	1
8	DC-2	-	-	-	0.029	0.0073	30	75	0.67	4.51
10	DC-1	-	-	-	0.0010	0.00025	27	75	1.6	2.91
11	SS-1	-	-	-	0.057	0.014	30	75	.67	4.51
1A1	GB-1 (GB 1A-1)	0.51	0.43	0.0031	0.039	0.039	26	240	15.69	2.61
1A2	GB-1 (GB 1A-2A, GB 1A-2B)	0.71	0.59	0.0042	0.054	0.054	26	240	24.85	2.61
1A3	GB-1 (GB 1A-3A, GB 1A-3B, GB 1A-4, GB 1A-5)	1.06	0.89	0.0064	0.080	0.080	26	240	54.72	2.61
1B1	GB-1 (GB 1B-1, GB 1B-2)	0.39	0.33	0.0024	0.030	0.030	24	150	18.24	2.28
1C1	GB-1 (GB 1C-1, GB 1C-2, GB 1C-3)	0.24	0.2	0.0014	0.018	0.018	24	240	8.16	2.76
2A1	GB-2 (GB 2A-1)	0.88	0.74	0.0053	0.067	0.067	26	240	769.65	0.33

2A2	GB-2 (GB 2A-2A, GB 2A-2B)	0.55	0.46	0.0033	0.042	0.042	24	240	28.3	2.61
2A3	GB-2 (GB 2A-3A, GB 2A-3B)	0.47	0.4	0.0028	0.036	0.036	24	240	19.44	2.61
2B1	GB-2 (GB 2B-1, GB 2B-2, GB 2C-1, GB 2C-2, GB 2C-3)	0.51	0.43	0.0031	0.039	0.039	24	160	10.79	2.46

A downwash analysis using the latest version of BPIP will be conducted and incorporated into the modeling analysis to account for potential effluent downwash due to structures at the facility. All building heights and dimensions will be confirmed before any modeling is done.

Table 2- Building Downwash Structures

Building ID	Building Shape	X Coordinate m	Y Coordinate m	Elevation m	Height ft	X Length ft	Y Length ft	Angle
BLDG-1A	Polygon	330606.7	3575549.3	1185.82	25	N/A	N/A	N/A
BLDG-1B	Polygon	330593	3575573.9	1185.75	15.5	N/A	N/A	N/A
BLDG-1C	Polygon	330625.4	3575453.2	1186	18.25	N/A	N/A	N/A
BLDG-1D	Polygon	330573.1	3575489.9	1185.87	22.5	N/A	N/A	N/A
BLDG-1E	Polygon	330620.6	3575406.2	1185.95	25	N/A	N/A	N/A
BLDG-2	Polygon	330452	3575691.8	1186.36	26.58	N/A	N/A	N/A
ADMIN	Rectangular	330671.3	3575481.3	1185.45	15.5	394.685	194.2257	59.2
DRAPER	Polygon	330609.5	3575594.9	1185.44	26	N/A	N/A	N/A
FORKLIFT	Polygon	330629.6	3575630.6	1185.76	17	N/A	N/A	N/A
UTILITY	Rectangular	330536.3	3575602	1186.25	25	14.10761	44.94751	58.9
WIP-LOAD	Rectangular	330534.8	3575668.7	1186.07	26.58	30.51181	48.88451	59.1
FIN-LOAD	Rectangular	330608.8	3575427.6	1186.19	22.5	62.00787	28.87139	59.6
W-GH	Rectangular	330621.3	3575687.4	1185.92	16	73.16273	29.85564	89
E-GH	Rectangular	330636.2	3575680.1	1185.92	16	48.22835	31.16798	89.5
MOB-OFF	Rectangular	330661.3	3575450.8	1185.55	15.5	22.6378	62.99213	-23.2

2.2 Receptor Grid Description and Elevation Data

The center point of the facility will be designated at 330596 meters east and 3575591 meters north. This center point will serve as the center point for a variable density circular receptor grid. The facility fence line will be modeled using 25 meter grid spacing. A 50 meter grid spacing will extend out to 800 meters in each direction from the facility center point for a very fine grid resolution. A 100 meter grid spacing will extend from 800 meters to 3,000 meters in each direction for a fine grid resolution. A 250 meter grid spacing will extend from 3,000 meters to 6,000 meters in each directions for a medium grid resolution. A 500 meter grid spacing will extend from 6,000 meters to 10,000 meters in each direction for a coarse grid resolution. A 1,000 meter grid spacing will extend from 10,000 meters to 50,000 meters in each direction for a very coarse grid resolution. It is expected that the highest impacts from the proposed source will be at or near the facility property.

For the Class I area analysis, a grid spacing of 1000 m is used for receptors over the Class I area. Class I receptors will be obtained through NMED MergeMaster.

The elevations of receptors and facility sources will be determined using the most recent NED data currently available (1/3 arc-second DEM) from the USGS website.

2.3 Meteorological Data

The Las Cruces NWS dataset will be used for five meteorological years (2018-2022) as available on the NMED website.

2.4 Significance Analysis (SIL) and Cumulative Impact Analysis (CIA)

The modeled ground-level concentrations will be compared to the corresponding significant impact levels (SILs) to determine whether any modeled ground-level concentrations at any receptor locations are greater than the SIL (i.e., “significant” receptors). If the significance analysis reveals that modeled ground-level concentrations for a particular pollutant and averaging period are greater than the applicable SIL, a Cumulative Impact Analysis (CIA) will be performed at the significant receptors. The CIA will include impacts from the facility sources and background concentrations and/or surrounding sources as applicable.

If necessary, the following monitors will be used for background concentrations:

- ▶ The US-Mexico Border Crossing Monitor (6ZN, 350130022) for NO₂;
- ▶ El Paso Chamizal Monitor (481410044) for CO;
- ▶ The Bloomfield Monitor (1ZB, 350450009) will be used for SO₂;
- ▶ The Las Cruces District Office of NMED Monitor (6Q, 350130025) dataset will be used for PM_{2.5}; and
- ▶ The Las Cruces City Well #46 Monitor (6WM, 350130024) dataset will be used for PM₁₀.

The inclusion of background concentrations will follow the guidance shown in Table 20: “Modeling the Design Value Summary (Default Modeling)” from the Modeling Guidelines¹. Based on the NMED Modeling Guidelines, background concentrations will be added to the model results and compared to the NAAQS and NMAAQS standards for NO₂, CO, and SO₂ for all applicable averaging periods.

For PM₁₀ and PM_{2.5}, the facility will be modeled with surrounding sources within 10 km of the facility and background concentration will be added to the modeling results and compared to the NAAQS standards for all applicable averaging periods. An inventory of the surrounding sources will be obtained from the NMED MergeMaster. Secondary formation is not required as this facility neither emits 40 tpy of NO_x or 40 tpy of SO₂.

2.5 PSD Increment Analysis

If the results of the ROI analysis for NO₂, SO₂, PM_{2.5}, or PM₁₀ indicate concentrations greater than significance levels, PSD increment analysis will be conducted for the appropriate averaging periods. If required, the PSD increment analysis will be conducted including all PSD increment consuming and expanding sources within 25 km of the facility, plus sources emitting over 1000 pounds per hour within 50 km of the facility. The surrounding source information will be obtained from NMED MergeMaster. The predicted maximum concentrations will be compared to the appropriate Class II PSD Standard.

2.6 Class I Areas Analysis

The nearest Class I area is the Gila Wilderness, which is 148.2 km southeast of the facility. A Class I area analysis will not need to be performed as the national forest is not within the 50 km inclusion zone for PSD minor sources.

¹ New Mexico Air Quality Bureau Air Dispersion Modeling Guidelines Revised June 2024

Section 17

Compliance Test History

(Submitting under 20.2.70, 20.2.72, 20.2.74 NMAC)

To show compliance with existing NSR permits conditions, you must submit a compliance test history. The table below provides an example.

Compliance Test History Table

Unit No.	Test Description	Test Date
N/A	ISCST3 modeling for Carbon Monoxide, Nitrogen Oxides, TSP, PM _{≤10}	2002
N/A	EPA test methods for PM _{2.5}	01/25/2009

Section 20

Other Relevant Information

Other relevant information. Use this attachment to clarify any part in the application that you think needs explaining. Reference the section, table, column, and/or field. Include any additional text, tables, calculations or clarifying information.

Additionally, the applicant may propose specific permit language for AQB consideration. In the case of a revision to an existing permit, the applicant should provide the old language and the new language in track changes format to highlight the proposed changes. If proposing language for a new facility or language for a new unit, submit the proposed operating condition(s), along with the associated monitoring, recordkeeping, and reporting conditions. In either case, please limit the proposed language to the affected portion of the permit.

No additional relevant information is attached to this document.

Section 22: Certification

Company Name: Olam West Coast, Inc

I, Arumuga Nainar, hereby certify that the information and data submitted in this application are true and as accurate as possible, to the best of my knowledge and professional expertise and experience.

Signed this 3rd day of January, 2025, upon my oath or affirmation, before a notary of the State of

New Mexico

[Signature]
*Signature

01/03/2025
Date

ARUMUGA NAINAR
Printed Name

Sr. Director of Operations
Title

Scribed and sworn before me on this 3 day of January, 2025.

My authorization as a notary of the State of New Mexico expires on the

10th day of October, 2028.

[Signature]
Notary's Signature

01/03/25
Date

Tabatha Martinez
Notary's Printed Name

*For Title V applications, the signature must be of the Responsible Official as defined in 20.2.70.7.AE NMAC.

