



Docket No. 50-0614

Date: December 5, 2025

LME Response to NRC RAI No. AQ-4

NRC RAI Letter No. ML25307A005 Dated November 6, 2025.

Regulatory Basis:

Long Mott Energy submitted an Environmental Report (ER), ML25090A063, as part of its CP application in accordance with 10 CFR Part 51, "Environmental Protection Regulations for Domestic Licensing and Related Regulatory Functions." The Nuclear Regulatory Commission's (NRC) regulations at 10 CFR Part 51, which implement Section 102(2) of the National Environmental Policy Act (NEPA) of 1969, include requirements for applicants to provide information as may be useful in aiding the NRC staff in complying with NEPA, and other federal consultation obligations such as Section 106 of the NHPA and Section 7 of the Endangered Species Act and the Clean Air Act (CAA).

REQUIREMENT: 10 CFR 51.45(c) requires that the ER includes a description of the affected environment, contains sufficient data to aid the Commission in its development of an independent analysis, and an analysis that considers and balances the environmental effects of the proposed action. Per NRC Regulatory Guide 4.2, this should include:

- A discussion of greenhouse gases and estimates of yearly emissions associated with building the plant.

RAI No: AQ-4

Please provide 1) the estimated air emissions for criteria pollutants and greenhouse gases generated during LMGS construction from the various sources identified in ER Section 4.4.5.3, or 2) some mechanism to supplement the ER information and determine the total LMGS construction emissions, or 3) bounding estimates, with an appropriate basis, for LMGS construction emissions.



LME Response:

A summary of estimated construction emissions is attached for concrete batch plants, diesel generators needed for concrete batch plants, off-road diesel equipment, worker commuting, unpaved roads, earthmoving activities and stockpile sources.

LMGS is in an attainment area and is not a major source for operations nor is it a named source listed in 40 CFR 51.166(b)(1)(iii)(a)-(aa). These factors combined with estimated construction emissions for the concrete batch plants and construction stationary sources (as defined in 40 CFR 63 Subpart ZZZZ), allow for the construction phase to proceed using TCEQ Permit By Rule (PBRs) and Standard permits.

Responder: Stephanie Yazzie

Reviewer: Jared Wicker, Milton Gorden and Mark Feltner

Enclosure:

As Stated

LMGS Construction Air Emissions Estimates

Source	PM ₁₀		PM _{2.5}		SO ₂		NO _x		CO		VOC		CO ₂	
	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
Concrete Batch Plants*														
Operations (Two 300 yd ³ /hr batch plants)	4.20E+00	4.20E+00	6.24E-01	6.24E-01										
Power (Two Tier 2 175 hp diesel generators)	5.76E-02	1.15E-01	5.76E-02	1.15E-01	3.59E-01	7.18E-01	1.90E+00	3.80E+00	1.01E+00	2.02E+00	4.40E-01	8.80E-01	2.01E+02	4.03E+02
Off-road equipment (diesel)														
Cement and Mortar Mixers*	2.08E-03	2.50E-02			1.09E-04	1.30E-03	5.34E-02	6.41E-01	4.14E-02	4.97E-01	7.68E-04	9.21E-03	7.25E+00	8.70E+01
Concrete/Industrial Saws*	9.32E-03	9.32E-03			6.97E-04	6.97E-04	2.47E-01	2.47E-01	3.71E-01	3.71E-01	3.04E-03	3.04E-03	5.85E+01	5.85E+01
Cranes	1.43E-02	6.44E-02			1.38E-03	6.20E-03	4.22E-01	1.90E+00	3.74E-01	1.68E+00	6.14E-03	2.76E-02	1.29E+02	5.79E+02
Excavators	8.60E-03	7.74E-02			1.32E-03	1.18E-02	2.27E-01	2.04E+00	5.09E-01	4.58E+00	5.05E-03	4.54E-02	1.20E+02	1.08E+03
Generator Sets*	8.10E-03	1.64E-01			6.98E-04	1.41E-02	2.33E-01	4.72E+00	2.67E-01	5.40E+00	2.59E-03	5.25E-02	6.10E+01	1.24E+03
Graders	1.47E-02	2.21E-02			1.50E-03	2.24E-03	3.31E-01	4.97E-01	5.70E-01	8.54E-01	6.10E-03	9.15E-03	1.33E+02	1.99E+02
Off-Highway Trucks	1.42E-02	1.57E-01			2.66E-03	2.92E-02	4.77E-01	5.25E+00	5.38E-01	5.92E+00	1.03E-02	1.13E-01	2.60E+02	2.86E+03
Other Construction Equipment	6.86E-03	1.03E-01			1.27E-03	1.90E-02	2.02E-01	3.03E+00	3.47E-01	5.21E+00	3.99E-03	5.99E-02	1.23E+02	1.84E+03
Other Material Handling Equipment	1.24E-02	1.24E-01			1.54E-03	1.54E-02	3.84E-01	3.84E+00	4.36E-01	4.36E+00	6.28E-03	6.28E-02	1.41E+02	1.41E+03
Pressure Washers*	1.88E-03	3.76E-03			1.25E-04	2.51E-04	5.61E-02	1.12E-01	5.31E-02	1.06E-01	5.97E-04	1.19E-03	9.41E+00	1.88E+01
Rollers	1.22E-02	2.75E-02			7.69E-04	1.73E-03	2.50E-01	5.63E-01	3.76E-01	8.47E-01	3.70E-03	8.32E-03	6.70E+01	1.51E+02
Rubber Tired Dozers	4.19E-02	1.88E-01			2.45E-03	1.10E-02	1.08E+00	4.87E+00	6.62E-01	2.98E+00	1.51E-02	6.79E-02	2.39E+02	1.08E+03
Rubber Tired Loaders	1.21E-02	5.44E-02			1.20E-03	5.40E-03	2.83E-01	1.28E+00	4.31E-01	1.94E+00	5.04E-03	2.27E-02	1.09E+02	4.89E+02
Scrapers	3.35E-02	1.13E-01			2.69E-03	9.07E-03	8.39E-01	2.83E+00	7.19E-01	2.43E+00	1.35E-02	4.55E-02	2.62E+02	8.86E+02
Skid Steer Loaders	1.90E-03	1.29E-02			3.75E-04	2.53E-03	1.35E-01	9.14E-01	2.10E-01	1.42E+00	1.68E-03	1.13E-02	3.03E+01	2.04E+02
Tractors/Loaders/Backhoes	5.88E-03	1.18E-02			7.75E-04	1.55E-03	1.86E-01	3.71E-01	3.59E-01	7.17E-01	3.03E-03	6.06E-03	6.68E+01	1.34E+02
Trenchers	2.15E-02	4.30E-02			6.96E-04	1.39E-03	3.48E-01	6.96E-01	4.09E-01	8.17E-01	6.08E-03	1.22E-02	5.87E+01	1.17E+02
On-road Commuting														
Light Duty Vehicles		5.33E-02		4.90E-02				1.03E+01		1.29E+02		1.33E+01		5.59E+03
Passenger Car		1.20E-02		4.90E-02				1.88E+00		2.56E+01		2.81E+00		1.00E+03
Unpaved roads		1.47E+02		1.47E+01										
Earthmoving		3.09E+00		7.72E-01										
Stockpiles	1.07E+00	4.69E+00	5.60E-01	2.43E+00										
EMISSIONS TOTAL (TPY)		1.61E+02		1.88E+01		8.51E-01		4.98E+01		1.96E+02		1.76E+01		1.94E+04
EMISSIONS SUBJECT TO NSR/Title V/PSD Consideration (TPY)*		4.52E+00		7.40E-01		7.34E-01		9.52E+00		8.39E+00		9.46E-01		

*includes stationary internal combustion engines (as defined in 40 CFR 63 Subpart ZZZZ) and concrete batch plants