



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
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DALLAS, TX 75202-2733

Ms. Rita Bates
Planning Section Chief, Air Quality Bureau
New Mexico Environment Department
525 Camino de los Marquez, Suite 1
Santa Fe, NM 87505

Re: New Mexico's Proposed Five Year Progress Report

Dear Ms. Bates:

We appreciate the opportunity to comment on New Mexico's Regional Haze Progress Report. Overall, we believe it was well prepared, the data and analysis was comprehensive, and information was presented in a clear and easily understandable manner. The Progress Report State Implementation Plan (SIP) revision addresses the adequacy of the existing regional haze SIP to meet the reasonable progress goals of the state's nine (9) Class I areas and assesses the current visibility conditions and recent changes in emissions. Visibility conditions are improving at all Class I areas in the state, and all but two have already exceeded the visibility improvement goals set for 2018. We offer the following comments to strengthen the SIP:

- We recommend updating section 1 to reflect the current status of the New Mexico Regional Haze SIP (NM RH SIP) revision containing the "State Alternative" for NOx BART for the San Juan Generating Station. It would also be helpful to include additional detail on the emission reductions achieved at the facility in response to the 2005 consent decree as well as emission reductions and implementation schedule anticipated in the new RH SIP revision in the appropriate sections of the report. Emission reductions at San Juan Generating Station are a significant element of the measures implemented during the first planning period that improve visibility conditions at Class I areas within the State and surrounding areas.
- 309(d)(10)(i)(A) requires a description of the status of implementation of all measures included in the implementation plan for achieving reasonable progress goals for mandatory Class I Federal areas both within and outside the State. Section 309(d)(10)(i)(B) requires A summary of the emissions reductions achieved throughout the State through implementation of the measures described in paragraph (d)(10)(i)(A). Please expand sections 3.2 and 3.3 to provide additional detail on the status of the emissions reduction measures that were included in the WRAP regional haze emissions inventory and RPG modeling, and included in the state's long-term strategy. This summary should include a brief discussion of the benefits associated with each measure and quantification of these emission reductions achieved throughout the state through implementation of these measures wherever possible. We recommend including information on any additional measures being implemented

that were not relied upon in the initial regional haze SIP to meet RPGs, but have resulted in additional visibility benefits.

- As our guidance¹ indicates, “For current visibility conditions, the reports should include the 5-year average that includes the most recent quality assured public data available at the time the state submits its 5-year progress report for public review.” This would include data at least through 2011. We note that the WRAP TSS website provides summaries of rolling 5-yr averages including data for 2011 for each Class I area. In addition to the trend analysis contained in section 3 and Appendix C of the SIP, this data is useful for examining the overall trends in visibility conditions and contributions from the different light impairing species.
- Table 3.3 shows an increase in sulfate across all Class I areas between the 2000-2004 baseline and the 2005-2009 period. The report will be improved if it provides available information on the potential causes of this increase, including any available information on the 2005 sulfate transport event mentioned on page 21. How does more recent data for 2010 and 2011 compare to the 2005-2009 period? Are there reductions in sulfate at Class I areas that can be identified in response to sulfate emission reductions at San Juan Generating Station in the 2009 and beyond time period?
- Section 3.5 provides an analysis of emissions and compares the 2002 emission inventory to a 2008 emission inventory developed for recent modeling efforts. We recommend you also include a comparison of emissions to the 2018 projected emissions included in the WRAP regional haze emissions inventory and RPG modeling, relied upon in the 2011 NMRH SIP. This comparison is useful in tracking progress towards emission reductions anticipated in the RH SIP as well as providing additional information on uncertainties and possible errors in the 2018 projections. For example, we noted in our earlier reviews of NM RH SIP submittals that large increases in projected area source emissions for SO₂ that were unlikely to occur. We also note the recent availability of the 2011 NEI data as a tool for making comparisons to a more current emission inventory.
- Large reductions in SO₂ and NO_x emissions from point sources are identified between the 2002 and 2008 emission inventory. We recommend that the report provide additional information on the location of these emission reductions as well as recent emissions data, as available, for individual EGUs and other sources in the state. This additional information may also be helpful in quantifying emission reductions due to implementation of control measures for Section 3.3.

¹ General Principles for the 5-Year Regional Haze Progress Reports for the Initial Regional Haze State Implementation Plans (Intended to Assist States and EPA Regional Offices in Development and Review of the Progress Reports), April 2013

- We recommend adding information on the variability of impacts from wildfires from year to year and their impact on overall visibility conditions for the 20% worst days between the baseline and other 5-yr periods.
- We also recommend a discussion of any ongoing or future consultation with Texas concerning establishing consistent natural conditions for Carlsbad Caverns and Guadalupe Mountains. These two Class I areas are represented by a single monitor and separated by a small distance.
- We would value a discussion of any current efforts or plans for future consultation (either through the RPO process or separately) with Texas and other non-members of the WRAP RPO having emissions that may impact visibility at New Mexico Class I areas..

We continue to offer NMED our support during the SIP revision process. Please let us know how we may be of further assistance.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Guy Donaldson", with a stylized flourish at the end.

Guy Donaldson
Chief
Air Planning Section