

**New Mexico Environment Department's Responses to the
November 22, 2013 U.S. Environmental Protection Agency Comments Regarding
New Mexico's 2013 Regional Haze Progress Report.**

1. 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 NO_x 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.

The New Mexico Environment Department (NMED) has incorporated the current status and information on NO_x BART for the San Juan Generation Station (SJGS) and the emission reductions achieved due to the 2005 Consent Decree at SJGS (Section 3.3 of the Progress Report) in the 2013 Regional Haze (RH) Progress Report (in Sections 1.0 and 3.2 regarding BART, and in Section 3.3 regarding the Consent Decree).

2. 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.

NMED has included a summary of the major source long-term strategies in Section 3.2 of the 2013 RH Progress Report.

3. As our guidance 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.

NMED incorporated tables showing 5-year rolling averages in Section 3.4.1 of the 2013 RH Progress Report.

4. 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?

NMED incorporated additional information in regards to the increase of sulfate between the baseline and 2005-2009 period in Section 3.4.1. NMED has also incorporated information comparing more recent emissions data in Section 3.4.1.

5. 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 NM RH 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.

NMED has compared the 2018 projected emissions from the WRAP RH emissions inventory to present emission data in the 2013 RH Progress Report. See Figure 3.6.

6. 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.

NMED has provided additional information on SO₂ and NO_x emissions from point sources in the 2013 RH Progress Report. See Figure 3.6 and Section 3.3.

7. 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.

NMED has provided additional information on the impacts due to wildfire for the 20% worst days in Sections 3.4.1 and 3.4.2 of the 2013 RH Progress Report.

8. 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.

NMED has provided additional information on the state's consultation process with Texas in Section 2.0 of the 2013 RH Progress Report.

9. 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.

NMED has provided additional information on the state's consultation process with other RPOs in Section 1.1 of the 2013 RH Progress Report.