

**New Mexico Environment Department's Responses to the  
November 27, 2013 National Parks Conservation Associations Comments Regarding  
New Mexico's 2013 Regional Haze Progress Report.**

1. The Proposed Progress Report Does Not Meet §51.309(d)(10)(i)(A).

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

2. The Proposed Progress Report Does Not Meet §51.309(d)(10)(i)(B).

*NMED has provided additional information on SO<sub>2</sub> and NO<sub>x</sub> emissions from New Mexico point sources in the 2013 RH Progress Report. NMED also compared the 2018 projected emissions from the WRAP RH emissions inventory to present SO<sub>2</sub> and NO<sub>x</sub> emission data in the 2013 RH Progress Report.*

3. The Proposed Progress Report Does Not Meet §51.309(d)(10)(i)(C).

*NMED incorporated reasonable progress summaries for each Class I area that includes the rolling averages for 2000-2004, 2005-2009, 2006-2010, and 2007-2011.*

4. The data that New Mexico presents suggests that much of the improvement from the baseline through the 2005-2009 time period is due to decreases in particulate organic matter, which is largely the result of fire. Conversely, an increase in ammonium sulfate, largely an anthropogenic pollutant, was documented at each site.

*NMED incorporated a discussion on the interdependency of pollutants in the 2013 RH Progress Report. The 20% worst days occur on different days in different years depending on the presence of fire. In a high fire year, some of the 20% worst days are dominated by fire. However, in the absence of fire, the 20% worst days are dominated by other pollutants including sulfates. These days may occur at different times of the year as well. The graphs included in Section 3.3 of the revised Progress Report show that emissions of nitrogen oxides and sulfur dioxide from point sources in New Mexico are decreasing.*

5. The Proposed Progress Report Does Not Meet §51.309(d)(10)(i)(D).

*NMED has provided more recent information on SO<sub>2</sub> and NO<sub>x</sub> emissions from New Mexico point sources in the 2013 RH Progress Report. NMED had included a comparison of the 2018 projected emissions from the WRAP RH emissions inventory to present SO<sub>2</sub> and NO<sub>x</sub> emission data.*

6. Emissions from New Mexico's EGUs have largely stagnated in more recent history (2010-2012; data for the first 9 months of 2013 also indicates roughly the same). This reinforces the need for New Mexico to provide more detailed, thorough information about the controls that have already been adopted by sources, as well as those that are anticipated in the future.

*SJGS consent decree controls were completed in 2009. Additional controls at SJGS will be implemented upon EPA approval of the revised BART determination submitted in October 2013.*

*These will result in approximately 62% reduction of NO<sub>x</sub>, 67% reduction of SO<sub>2</sub>, and 50% reduction of PM.*

7. The Proposed Progress Report Does Not Meet §51.309(d)(10)(i)(E).

*NMED has reviewed the anthropogenic sources for the 2013 RH Progress Report that could potentially affect visibility in each of New Mexico's Class I areas and we do not agree that an additional analysis is necessary. See chart in Section 3.3 of the revised progress report that shows reductions in emission in New Mexico.*

8. The Proposed Progress Report Does Not Meet §51.309(d)(10)(i)(F).

*NMED has adhered to and is exceeding the state's regional commitments for emission reductions. The emission reductions that New Mexico agreed to during this regional planning process are also what other states have relied upon for their visibility modeling. In fact, New Mexico has reduced emissions further than those predicted for 2018 that other states relied upon for meeting their reasonable progress goals.*

9. The Proposed Progress Report fails to account for emission reductions from EPA's Federal Implementation Plan for San Juan Generating Station.

*NMED has incorporated a summary on the most recent Regional Haze (RH) SIP revisions regarding BART for San Juan Generating Station in the 2013 Regional Haze Progress Report. NMED submitted a revised BART determination in a revised Regional Haze SIP submittal in October 2013. EPA has committed to review and propose either approval or denial of that submittal no later than April 30, 2014 (135 days following completeness determination on December 17, 2013). The submitted SIP revision would require decreases of NO<sub>x</sub> emissions by 62 percent, SO<sub>2</sub> by 67 percent, and PM by 50 percent at San Juan Generating Station. Although the compliance deadline in the Federal Implementation Plan currently remains in effect, EPA has agreed that it will take action to withdraw that plan if the SIP is approved.*