

Comparative Analysis: Title 20 NMAC, Ch. 2 vs. Ch. 11



General Observations

Chapter 2 – State Regulations

- 59 Numbered Regulations
 - Specific to sources
 - Many not applicable to BernCo
- Different Rules
 - For different industries
 - For different locations
 - Ex. Part 22, “Fugitive Particulate Matter Emissions from Roads within the Town of Hurley.” [pop. 1,256]
- Rules for GHG Emissions

Chapter 11 – Albuquerque/ Bernalillo County Regulations

- 41 Numbered Regulations
 - Applicable across sources
 - Specific to BernCo
- Consolidated Rules
 - Fewer Parts
 - Equivalent Regulation
- GHG-related rules repealed
 - Also happened for Ch. 2
 - Some Ch. 2 rules remain

Analysis of Chapter 2

- Detailed ozone precursor rule
 - Goal: reduce NO_x, VOCs
 - Applies to facilities that do not exist in BernCo
- Smelters, Paper Mills, Cotton Gins, etc.
 - Not much applicability in BernCo
- Protection of Confidential Business Information (CBI)
- New additions: Regional Haze (Part 68), Clean Transportation Fuel (Part 92).
- Different structure, similar effect



Analysis of Chapter 11



- Fugitive Dust reg (Part 20) is comparatively more extensive
- Regs for Vehicle Emissions Inspection/ Maintenance (e.g. Part 100)
- Environmental Justice (Part 72)
- Excess Emissions (Part 49)
- Permit Fee Schedule (Part 2)
 - Includes fugitive dust
 - Room for updates.

Overall Conclusions

- Different structure, similar effect
- Chapter 2 Regulations
 - Facilities not in Bernalillo County (ex. oil & gas)
 - GHG Emissions
- Chapter 11 Regulations
 - Fugitive Dust Permits
 - Vehicle Emissions Inspection & Maintenance
- Continued Regulation Development

Questions?

