PENGAD 800-631-6989
AQD EXHIBIT
2e

Butt, Neal T.

From: Butt, Neal T.
Sent: Wednesday, February 23, 2011 8:38 AM
To: 'Medina.Dayana@epamail.epa.gov'
Cc: Donaldson.Guy@epamail.epa.gov; Kordzi.Joe@epamail.epa.gov; 'Shar.Alan@epamail.epa.gov'; Nieto, Margaret
Subject: RE: EPA Comments on Stakeholder Review Draft for the Albuquerque-Bernalillo County Section 309 Regional Haze SIP

Dayana,

thank you for providing comments. We will include additional exhibits in our NOI to show that NOx and SOx are not likely to contribute to visibility degradation in Class I areas in New Mexico, including the Gila and Carlsbad Caverns.

Regards,

Neal

"Write it on your heart that every day is the best day in the year."
-- Ralph Waldo Emerson

From: Medina.Dayana@epamail.epa.gov [mailto:Medina.Dayana@epamail.epa.gov]
Sent: Tuesday, February 22, 2011 5:04 PM
To: Butt, Neal T.
Cc: Donaldson.Guy@epamail.epa.gov; Kordzi.Joe@epamail.epa.gov
Subject: EPA Comments on Stakeholder Review Draft for the Albuquerque-Bernalillo County Section 309 Regional Haze SIP

Dear Mr. Butt:

Thank you for giving the U.S. Environmental Protection Agency (EPA) the opportunity to comment on the stakeholder review draft with proposed amendments to the "Section 309" Regional Haze State Implementation Plan (SIP) for Albuquerque-Bernalillo County. We would like to expand on our comments dated December 20, 2010, regarding the revisions to the Section 309 Regional Haze SIP that have been proposed by the City of Albuquerque Air Quality Division (AQD).

With regard to our comments on the Special Penalty Provisions for the 2018 Milestone, which are summarized in Section C, Part A5 of the SIP Elements in the Section 309 Regional Haze SIP for Albuquerque-Bernalillo County, we find it acceptable for Albuquerque's Special

Penalty Provision rule language to be consistent with that of the state of Utah. In your December 21, 2010 response to our comments you noted that there were differences among the Section 309 states in regard to each state's Special Penalty Provision rule language, and asked if the proposed revisions to the Albuquerque-Bernalillo County Special Penalty Provision rule language are acceptable. After consultation with EPA Region 8 staff, we would like to note that we find Albuquerque-Bernalillo County's proposed revisions to the Special Penalty Provisions for the 2018 Milestone, found at NMAC 20.11.46.20, to be acceptable.

With regard to our comments on how the Section 309 Regional Haze SIP for Albuquerque-Bernalillo County addresses the requirements of 40 CFR 51.309(g), which requires each Section 309 State to address additional Class I areas not on the Colorado Plateau, we note that in the documents titled "Appendix 2007-H" and "Addendum to Appendix 2007-H," the AQD addresses the impact of Bernalillo County's emissions on all proximal Class I areas via a qualitative analysis. The AQD's qualitative analysis includes emissions inventory data showing emissions by state, by county and by Bernalillo County, as well as by pollutant, thereby providing a rough estimate of the percentage of the State's overall emissions generated by Bernalillo County. This emissions inventory data shows that the WRAP has projected an increase in SOx emissions for New Mexico from 4966.01 TPY in 2002 to 14,073.54 TPY in 2018, and that Bernalillo County's contribution to the State's SOx emission is projected to increase from 9.5% in 2002 to 26.9% in 2018. The analysis also shows that the WRAP has projected a substantial increase in Bernalillo County area source NOx emissions. Although an explanation of these high projected emissions is not included in the Section 309 SIP, the AQD has subsequently stated that the WRAP's 2018 modeling projections for SOx and NOx emissions increases for Bernalillo County are inaccurate and indicative of higher emissions than what can reasonably be expected due to the fact that the WRAP's modeling is designed to be used at the state level. The AQD should evaluate what impact this flaw will have on the modeling projections for Class I areas in New Mexico. The WRAP's modeling shows visibility degradation in 2018 on the 20% best visibility days and 20% worst visibility days in the Gila Wilderness Class I area and degradation in 2018 on the 20% best visibility days in the Carlsbad Caverns National Park Class I area. Increases in extinction from sulfate and nitrate particulates contribute to these modeling projections. Since Bernalillo County's emissions are projected to increase, it could be responsible for all or part of the degradation. The effects of the accurate emissions inventory for Bernalillo County should be examined to assess the impact of Bernalillo County's SOx and NOx emissions in relation to the modeled visibility degradation in 2018 on the 20% best visibility days and 20% worst visibility days in Gila Wilderness and visibility degradation in 2018 on the 20% best visibility days in Carlsbad Caverns National Park.

Region 6 continues to offer Albuquerque-Bernalillo County our support during the rule revision process. Please let us know how we may be of further assistance by contacting me at (214) 665-7241 or Guy Donaldson, Air Planning Section Chief, at (214) 665-7242.

Sincerely,

Dayana Medina
U.S. Environmental Protection Agency, Region 6
Multimedia Planning and Permitting Division
Air Planning Section (6PD-L)
1445 Ross Avenue
Dallas, TX 75202
214-665-7241
medina.dayana@epa.gov