CITY OF ALBUQUERQUE

January 14, 2011

Corbin L. Newman, Jr.
Regional Forester, Southwestern Region
USDA Forest Service Regional Office
333 Broadway SE
Albuquerque, NM 87102

Re: COA/AQD Response to USFS Comments on Stakeholder Review Draft for Section 309 Regional Haze SIP, Albuquerque - Bernalillo County, NM

Dear Mr. Newman,

Thank you for the comments on our proposed SIP revision. In anticipation of the upcoming in-person consultation, the City of Albuquerque Air Quality Division (AQD) has drafted point-by-point responses to your comments in an attempt to address your concerns. If you have any further comments, please let me know.

Sincerely,

Neal Butt
Environmental Health Scientist
Air Quality Division
Environmental Health Department

PO Box 1293

Albuquerque

NM 87103

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cc:

Margaret Nieto, Control Strategies Supervisor, Air Quality Division
Mary Lou Leonard, Director, Environmental Health Department
Susanna M Ehlers, Air Quality Specialist, USDA FS Regional Office

PENGAD 800-631-6989
AQD EXHIBIT
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USFS

"Even though AQCB submitted a Section 309 SIP, the regional haze regulations of 40 CFR 51.308(i) require consultation between FLMs and the State. Specifically:

"The state must provide the Federal land Manager with an opportunity for consultation in person and at least 60 days prior to holding any public hearing on an implementation (or plan revision) for regional haze required by this subpart. This consultation must include the opportunity for the affected Federal Land Manager to discuss their:
(i) assessment of impairment of visibility in any mandatory Class I Federal area; and
(ii) recommendations on the development of the reasonable progress goal and on the development and implementation of strategies to address visibility impairment.

In the past, communication with the USFS from AQCB regarding regional haze SIPs has been adequate; however, we have no record of the Albuquerque-Bernalillo County Board contacting us about this SIP revision. We ask to be provided with the mandatory 60 day comment period for all SIP revisions.

AQD

With regard to the 60-day consultation requirement, you were provided with a stakeholder review draft on October 22nd, a date that you acknowledged in your letter, so it seems that the 60-day requirement has been met (i.e. 10/22/10-12/20/10). Nevertheless, we strive to provide stakeholders ample opportunity to comment and thus we have agreed to an in-person meeting to discuss any issues you have.

USFS

"Appendices
References to appendices are made throughout the document. However, no appendices were made available to the USFS. Therefore, we were unable to do a complete and thorough review of this SIP. Our comments do not include consideration of the Appendices."

AQD

The appendices for the 2003 and 2007-8 SIP effort were made available to stakeholders and the public during the respective SIP development processes. In addition, all of the 2003 and 2007-8 SIP appendices are posted on the AQD website (see http://www.cabq.gov/airquality/documentsforpublicreview.html). Only one additional appendix has been added for this 2010-11 SIP effort, "Appendix 2010-A" (see http://www.cabq.gov/airquality/regulation-development/stakeholder-review-drafts). If you are having trouble accessing a specific appendix, please let me know and I will provide it to you.

USFS

"Treatment of Clean Air Corridors
The *WRAP Policy Paper on Clean Air Corridors* is from November 2002. More recent data, if available, would give weight to the finding of no significant emissions growth. This, finding is concerning as it likely overlooks the emissions growth brought about by the expansion of oil and gas development in recent years."

AQD

The impetus of this SIP revision is to accommodate changes mandated by EPA, and not to rewrite the entire 2003 SIP. Therefore, much of the work completed in 2003 and 2007-8 remains unchanged. In addition, as mentioned in our response to USFS comments in 2007, "the AQD is unaware of any update to this WRAP Policy Paper. However, if you know of one, we would ask that you provide us with that information." Also, there is no oil or gas development in Bernalillo County.

USFS

"Reasonable Progress for Additional Class I Areas
The USFS provided comment to Albuquerque-Bernalillo County Air Quality Control Board (AQCB) in October 2007. A major focus of those comments centered upon the need to comply with the requirements of 40 CFR 51.309(g) which require AQCB to address additional Class I areas not on the Colorado Plateau. We appreciate AQCB's effort to address the requirements of 309(g). However, we believe the analysis is substantially incomplete and does not meet the intentions of 40 CFR 51.309(g)(1) and (g)(2).
Under (g)(2) of 40 CFR 51.309, the implementation plan must comply with requirements 308(d)(l) through (4). The Albuquerque-Bernalillo County implementation plan does not examine the effects of its emission control strategy in relationship to non-Colorado plateau Class I areas."

AQD

As mentioned on page 109 of the current draft, the WRAP has not modeled the impacts of emissions on Class I areas at the county level. Therefore, the AQD has utilized emissions inventory data and normalized weighted emission potentials (WEP) to develop a qualitative analysis of the impact emissions from Bernalillo County have on Class I Areas (see Appendix 2007-H & Addendum to Appendix 2007-H). It is the opinion of the AQD that it is improbable that Bernalillo County's emissions have a significant visibility impact (see page 110).

USFS

"In reviewing information provided in New Mexico's previous draft 308 implementation plan pertaining to the establishment of reasonable progress goals pursuant to 40 CFR

51.308(d)(I), we noted that the plan goals did not meet the uniform rate of progress (URP) in improving visibility on the 20% worst days and also allowed for degradation in the most impaired days at Gila Wilderness, and degradation in the least impaired days at Gila Wilderness and Carlsbad Caverns National Park. The supporting modeling information also showed incremental increases in anthropogenic emissions impacting New Mexico Class I Areas (Bandelier National Monument and Carlsbad Caverns National Park). From our review of the NM 308 SIP, we noted the following:

1. Section 11.3.1 - Bandelier National Monument: PSAT results for $S0_4$ and $N0_3$ (Figure 9-10 and 9-12) show a significant increase in the NM area category.

2. Section 11.3.2 -Bosque del Apache Wildlife Refuge: PSAT results for $S0_4$ and $N0_3$ (Figure 9-14 and 9-16) also show a significant increase in the NM area category over the baseline period.

3. Section 11.3.3 - Carlsbad Caverns National Park: PSAT results for $N0_3$ (Figure 9-20) show an incremental increase in the NM area category over the baseline period.

4. Section 11.3.4 - Gila Wilderness: The documentation does not support the conjecture that OC from wildfire would account for a 45% increase in 2018 in the extinction budget over baseline conditions.

5. Section 11.3.5 - Wheeler Peak/Pecos Wilderness Areas: PSAT results for $N0_3$ show a significant increase in $N0_3$ impacts from NM area sources (Figure 9-28)."

AQD

These sections were not drafted by AQD. They were drafted by the NMED Air Quality Bureau as part of their 'Visibility Modeling and Source Apportionment' chapter in their draft 308 implementation plan and their 'Reasonable Progress Goal Demonstration' in their draft 309(g) SIP. AQD asserts that emissions from Bernalillo County do not interfere with the attainment of the URP by New Mexico, or the "degradation in the most impaired days at Gila Wilderness, and degradation in the least impaired days at Gila Wilderness and Carlsbad Caverns National Park." Nor do they contribute significantly to the "incremental increases in anthropogenic emissions impacting New Mexico Class I Areas (Bandelier National Monument and Carlsbad Caverns National Park)."

USFS

"Our evaluation of available WRAP information suggests Bernalillo County may in fact play a significant role in the 2018 modeling projections for a number of NM Class 1 areas. In Figure I (attached), Bernalillo County area source S02 emissions are projected to increase by nearly 10,000 tons per year."

AQD

The 2018 modeling projections for SOx emissions increases for Bernalillo County are inaccurate. The AQD SOx analysis in Appendix 2007-H was developed using WRAP's data, and shows that New Mexico's SOx emissions (including Bernalillo County), are projected to only increase slightly from the 'Plan02d' Scenario (baseline emissions for the years 2000-2004) to the 'PRP18a' Scenario (projected emissions for 2018), from 52,347.15 TPY to 52,404.76 TPY; whereas Bernalillo County's SOx emissions are estimated to increase by 9,107.529 TPY. This is obviously an artifact of the model and incorrect emissions data inputs. Bernalillo County is certainly not the 'tail wagging the dog' when it comes to SOx emissions in New Mexico. Bernalillo County's SOx emissions estimated by the WRAP for 'Plan 02d' are 4,966.011 TPY, whereas the actual value for SO_2 reported to EPA for 2002 was 1048.84 TPY and for 2005 was 666.83 TPY. The two largest point sources of SOx are GCC Rio Grande Cement which emits 23.2 TPY, and the Southside Water Reclamation Plant, which emits 2.46 TPY. With low-sulfur fuel now the rule, area source emissions cannot possibly increase 400% in the next eight years, regardless of any projected increase in population or vehicle miles traveled (VMT). Emissions are decreasing yearly at an incremental rate, contrary to the predicted 9,000 TPY increase by the year 2018.

USFS

"As indicated in Figure 2, Bernalillo County area source NOx emissions are projected to increase nearly 6,500 tons per year and point source NOx emissions by several hundred tons per year. For both SO_2 and NOx, Bernalillo County accounts for the vast majority of statewide increases of these pollutants."

AQD

The 2018 modeling projections for area source NOx emissions increases for Bernalillo County are inaccurate. The AQD NOx analysis in Appendix 2007-H was developed using WRAP's data, and shows that New Mexico's NOx emissions (including Bernalillo County), are projected to decrease from the 'Plan02d' Scenario to the 'PRP18a' Scenario, from 346,049.80 to 286,975.40 TPY; whereas the Bernalillo County NOx emissions are estimated to decrease from 33,856.36 to 26,878.08 TPY. Bernalillo County's total NOx emissions estimated by the WRAP for 'Plan 02d' are 33,856.36 TPY, whereas the actual value reported to EPA for 2002 was 24,427.58 TPY and for 2005 was 18,974.35 TPY, which is a huge discrepancy. WRAP's data for On-Road Mobile emissions predict a decrease of 11,825 TPY while area sources are predicted to increase by 4,879 TPY. This is obviously wrong. An emissions estimate of 16,000 TPY for on-road mobile emissions is realistic, but projecting a huge decrease in emissions in the future when VMT continues to increase, is not. The 'lion's share' of NOx emissions in Bernalillo County are from vehicles, so it is unrealistic to project a 4,879 TPY increase in undefined area source emissions, while at the same time predicting a decrease in on-road mobile emissions.

USFS

"Likewise, the Albuquerque-Bernalillo County implementation plan does (sic) address the requirements of 40 CFR 51.308(d)(3) in which the plan must demonstrate that it has included all measures necessary to get its share of the emissions reductions needed to meet the progress goal for Class I areas outside of the county. Under 40 CFR 51 .309(g)(2)(i), the state may build upon strategies implemented pursuant 309(d). AQCB has made no attempt to analyze the relationship of $S0_2$ emission reductions projected to be realized from implementation of the $S0_2$ strategy to non-Colorado Plateau Class 1areas."

AQD

AQD asserts that emissions from Bernalillo County do not significantly affect visibility in Class I areas. As such, AQD has not implemented any SO_2 emissions reduction strategies beyond those contained in the model trading rule, 20.11.46 NMAC, *Sulfur Dioxide Emissions Inventory Requirements: Western Backstop Sulfur Dioxide Trading Program.* Therefore, no analysis has been performed on "the relationship of $S0_2$ emission reductions projected to be realized from implementation of the $S0_2$ strategy to non-Colorado Plateau Class 1 areas". However, rules that are currently 'on the books' that improve air quality and visibility include: NNSR, PSD, Title V, NSPS, NESHAPs, I/M program, Oxyfuels, Clean Cars rule, fugitive dust control, open burning, etc.