State of New Mexico

Susana Martinez
Governor

May 24, 2011

Dr. Alfredo Armendariz, Regional Administrator
U.S. Environmental Protection Agency, Region VI
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

SUBJECT: SO_2 NAAQS Area Attainment Designation Recommendation for Bernalillo County, New Mexico

Dear Dr. Armendariz,

On June 2, 2010, EPA Administrator Lisa Jackson signed the revised primary SO_2 NAAQS [75 FR 35520, published on June 22, 2010] after review of the existing two primary SO_2 standards, promulgated on April 30, 1971 [36 FR 8187]. EPA established the revised primary SO_2, standard at 75 parts per billion (ppb) which is attained when the 3-year average of the 99th percentile of 1-hour daily maximum concentrations does not exceed 75 ppb. Section 107 (d)(1) of The Clean Air Act stipulates that all state governors must submit initial designation recommendations within one year of the promulgation of any new or revised NAAQS. Therefore, this letter fulfills the Governor's requirement to provide the recommendation for initial designation to EPA by June 3, 2011 as it applies to Bernalillo County.

In conjunction with the new standard, EPA is also revising the ambient air monitoring requirements for SO_2, by requiring the placement of a new SO_2 monitor within any 'Core Based Statistical Area' (CBSA) with a calculated population weighted emissions index (PWEI) value equal to or greater than 5,000, but less than 100,000. To calculate the PWEI for a particular CBSA, using the latest Census Bureau estimates (e.g. 2008), the population of a CBSA is multiplied by the total amount of SO_2 emissions in the CBSA. The CBSA emissions value is in tons per year (using the latest available National Emissions Inventory (NIE) data {e.g. 2008}), and is calculated by aggregating the county level emissions for each county in a CBSA. You then divide the resulting product of CBSA population and CBSA SO_2 emissions by 1,000,000 to provide a PWEI value in units of 'millions of people-tons per year'. {PWEI (2008) = 845,913 people * 261 TPY SO2/1,000,000 = 221}

Therefore, the Air Quality Division (AQD) of the City of Albuquerque's Environmental Health Department, is not required to install any new SO_2 monitors. However, unrelated to these requirements, AQD started ambient air monitoring for SO_2 on January 1, 2011 as a component of the EPA 'NCore Monitoring Program.'

Thus, a full set of air quality data from the new network will not be available until after 2013. Once these data have been collected, then AQD will be able submit a request through me to you, that the area be redesignated from "unclassifiable" to "attainment". Until then, AQD recommends the area

within the jurisdiction of the Albuquerque - Bernalillo County Air Quality Control Board be designated as "unclassifiable".

Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Susana Martinez
Governor

cc: Mr. F. David Martin, Secretary, New Mexico Environment Department
Mr. Richard Goodyear, Acting Chief, Air Quality Bureau, NM Environment Department
Mayor Richard J. Berry, City of Albuquerque
Ms. Mary Lou Leonard, Director, Albuquerque Environmental Health Department
Ms. Margaret Nieto, Control Strategies Supervisor, Albuquerque Air Quality Division
Mr. Fabian Macias, Air Quality Assurance Manager, Air Quality Division