November 20, 2024

Caroline Alden
Co-founder & Chief Scientist
LongPath Technologies
Electronic mail: Caroline.Alden@longpathtech.com

Via electronic mail

Re: Conditional Approval – LongPath Alternative Monitoring Plan for 20.2.50 NMAC

Dear Caroline Alden:

This letter serves as a conditional approval of the LongPath Technologies application for its technology to be used by companies with facilities subject to the *Ozone Precursor Rule* as a pre-approved alternative monitoring technology pursuant to 20.2.50.116.D(2) New Mexico Administrative Code. To be eligible to use this technology in an Alternative Monitoring Plan, any company wishing to use this pre-approved technology at a specific facility must provide advance notice to the New Mexico Environment Department (Department or NMED) in accordance with 20.2.50.116.D(2)(a).

Companies choosing to deploy the LongPath system must do so in a manner consistent with installation and operating practices included in the Alternative Equipment Leak Monitoring Plan provided to NMED by LongPath Technologies in October, 2024 which include, but are not limited to the following:

- The LongPath Monitoring System must follow the Work Practices established in Sections 3.b., "Description of LongPath Technology Analytics, 3.c., "Quality Control and Assurance Procedures and Data Quality Indicators", and, 5, "Proposed Alt. ELM Work Practices," of the application supplement, unless otherwise specifically noted in the conditions below.
- A full OGI/Method 21 sweep of a site being monitored by a LongPath Monitoring System must be completed within four (4) weeks of the initial monitoring system installation.
- The LongPath Monitoring System must be set to alert at a level of 10 kg/hr or less above the site-specific baseline concentrations.
- The LongPath Monitoring System must be capable of providing real-time notifications to site operators whenever emission levels demonstrate the likely presence of emissions below 10 kg/hr that are outside of normal operating conditions, indicating possible process upsets, malfunctions or fugitive emissions.
- The LongPath Monitoring System nodes must be placed no farther than the maximum validated distance of 5 km from the centralized laser spectrometer.
- The LongPath Monitoring System retroreflectors must be placed in such a way as to ensure a minimum of one (1) recorded, successful, quantification measurements per monitored area per 24-hour day in normal monitoring mode, with the ability to consistently collect a minimum of four (4) measurements per day in enhanced mode.

- The LongPath Monitoring System may only be operated by certified and trained LongPath employees, as outlined in Section 3.c.ii, "Training, Certification, and User Competence," of the application submitted to the Department. The LongPath Monitoring System operator must be able to provide certification or training documentation demonstrating competency in using the LongPath Monitoring System.
- The operator of a facility monitored by a LongPath Monitoring System must retain and make available for inspection upon request a copy of this approval letter, historical records up to 5 years prior, and any applicable training/certification documents for monitoring system technicians.

The New Mexico Air Quality Bureau thanks you for your interest in providing this service and for your patience as numerous technical questions were addressed during the application approval process.

Sincerely,

Cindy Hollenberg Digitally signed by Cindy Hollenberg
Date: 2024.11.20 14:25:30 -07'00'

Cindy Hollenberg, Chief
Air Quality Bureau
New Mexico Environment Department