



MEMORANDUM

Date: November 21, 2024

To: Owners and Operators of Facilities Subject to 20.2.50 NMAC

From: Air Quality Bureau, Compliance & Enforcement

Subject: Revision of Conditional Approval for Use of Drones in OGI Monitoring

Background

On July 18, 2023, the Air Quality Bureau (“AQB”) issued a conditional approval for the use of drones carrying optical gas imaging (“OGI”) cameras to satisfy the required emissions monitoring in 20.2.50 NMAC (Sections 116, 121, and 122). AQB has received inquiries about revising the requirement for drones to fly and hover within 10 meters of each source required to be monitored (see 4. under “Conditional Approval” in July 18, 2023 Memorandum). This Memorandum revises requirement 4. to the language and conditions below. No other section or requirement in the July 18, 2023, Memorandum is revised.

New Language for Condition 4 from July 18, 2023, Memorandum

4. Drones must be capable of flying (with the OGI camera attached) and hovering within 10 meters (~30 feet) of each source required to be monitored.

As an alternative to the 10-meter requirement, drones carrying OGI cameras must be capable of hovering at a distance from the monitored component no greater than the distance at which the OGI equipment meets the minimum detection thresholds listed in the table below. If this alternative is utilized, the owner or operator shall have and produce upon request records verifying both the detection threshold of the camera and a statement from the drone operator or manufacturer that the drone can hover at the required distance. If allowable as a setting on the

camera, OGI videos from the monitoring shall include (embedded in the video) the distance from the component being monitored.

Minimum frequency for monitoring	Minimum detection threshold of OGI camera (kg/hr) (based on 90% detection threshold)
Monthly	≤ 5
Quarterly, Semi-annual, or Annual	≤ 1