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June 25, 2003

Mr. Carl Edlund
Multimedia Planning and Permitting Director
US EPA Region-6
1445 Ross Avenue
Dallas, Texas 75202-2733

Dear Mr. Edlund

I am pleased to submit to you the first progress report for the San Juan County, New Mexico Early Action Compact (EAC). This progress report contains a detailed account of the EAC endeavor in San Juan County to date.

The progress report contains the following information on the San Juan County EAC:

- An overview of the progress that has been made;
- How the stakeholder process was developed;
- Potential emission reduction control strategies;
- Public outreach activities; and
- Modeling/planning technical activities.

The State of New Mexico looks forward to your approval of our submittal and our continued work in trying to preserve and protect air quality in San Juan County. If you should have any questions about the enclosed report, please contact Gail Cooke of my staff at (505) 955-8022.

Sincerely,

Sandra Ely
Air Quality Bureau Chief

Enclosure

cc: Tom Diggs, EPA Region 6 (6PD-L)
Michael Morton, EPA Region 6 (6PD-L)

San Juan County, New Mexico
Early Action Compact Progress Report
June 2003

Overview

This document reports the progress achieved through June 2003 in meeting the milestones of the Early Action Compact (EAC) to address ground-level ozone in San Juan County, New Mexico. The EAC is a signed agreement that permits the New Mexico Environment Department's Air Quality Bureau to work with stakeholders from San Juan County in addressing ozone levels that approach the 8-hour National Ambient Air Quality Standard (NAAQS) for ozone. The goal of the EAC is to prevent an exceedence of the NAAQS for ozone, and by doing so, avoid a nonattainment designation for the area. The San Juan County EAC was signed in 2002 by the U.S. Environmental Protection Agency (EPA), the New Mexico Environment Department, San Juan County, and the cities of Aztec, Bloomfield, and Farmington. Since the EAC was signed, the Air Quality Bureau submitted a work plan to EPA for grant funding, public outreach continued, and work to meet the EAC milestones began.

Development of the Stakeholder Process

After monitoring concentrations of ground-level ozone in San Juan County that approach the ozone NAAQS, the Air Quality Bureau hosted an open house and public meeting in April 2002 to bring the issue of ozone to the attention of San Juan County citizens. San Juan County is comprised of roughly 5,500 square miles with a population of about 110,000. The emergence of concern about local ozone levels was an entirely new issue for the County's communities. The first public meeting assigned to the Air Quality Bureau responsibility for bringing together a Task Force to address the ozone issue.

The Air Quality Bureau formed the Ozone Task Force by recruiting members with letters, phone calls, and email. Membership on the Task Force is open to the public. The Task Force met for the first time in October 2002, and a Task Force Steering Committee was selected by grouping attendees into caucuses and having each caucus select a representative for the Steering Committee.

The interests represented on the Task Force and the Task Force Steering Committee include the following:

- Community Groups
- Concerned Citizens
- Consultants
- Environmental Groups
- Federal Government (EPA)

- Federal Land Managers
- Health Organizations
- Industry
- Local Governments
- State Government
- Tribes

November 2002 brought another open house and public meeting, with a presentation featuring the most recent ozone monitoring data (2002) and an update on the formation of Task Force. Also in November 2002 was the next meeting of the Task Force Steering Committee, during which the option of pursuing an Early Action Compact was introduced by the Air Quality Bureau. After discussion, the Steering Committee voted in favor of pursuing the EAC.

December 2002 was a month spent introducing the topic of ozone pollution and the EAC to the probable signatories (San Juan County, Aztec, Bloomfield, and Farmington) at city council, county council, and special meetings. After each of the four local signatories gave approval to the EAC, all signatories came together in a formal EAC signing ceremony on December 20, 2002.

The Task Force Steering Committee came together for their next meeting in January 2003. This meeting included discussing the timeline and milestones of the EAC, state funding for the EAC, and the relationship between the Task Force and local governments.

February and March 2003 were devoted to obtaining a legislative appropriation for state matching funds for the EAC and developing and issuing a Request for Proposals (RFP) for photochemical modeling analysis to be completed in accordance with EAC milestones. The legislative appropriation was obtained and a contractor was selected to perform the modeling analysis.

A meeting of the entire Task Force occurred during April. This meeting was used to introduce the preliminary list of potential control strategies, to receive feedback and answer questions.

Currently, EAC modeling work is underway, with the participation and contributions of a Technical Peer Review Committee, as described below.

Potential Emission Reduction Measures

The Air Quality Bureau compiled a draft list of potential control strategies, or emission reduction measures, that may be useful in keeping ozone levels below the NAAQS. The preliminary list of potential control strategies was sent by email to Task Force members on April 1, 2003. At the April 16, 2003 Task Force meeting, hard copies of the list were distributed and discussed with Task Force members. Input and suggestions were solicited, noted, and followed up on by Air Quality Bureau staff. During May, the list was distributed by email to EAC signatories, who were encouraged to provide input and feedback on what strategies may or may not be feasible, and if there are any strategies that should be added or deleted from the list. All feedback from Task Force members and

EAC signatories was requested by June 9, 2003, which allowed the Air Quality Bureau to format the final list of potential control strategies and submit it to EPA prior to the June 16, 2003 due date. For details on potential control strategies, please refer to the document entitled Potential Control Strategies for Ozone Formation in San Juan County.

Public Outreach Activities

The Air Quality Bureau's outreach to stakeholders and the public about ozone and the San Juan County EAC has occurred through the following channels:

- Open houses and public meetings that have included public presentations about ozone and the EAC: April 23, 2002; November 6, 2002; Planned for July 16, 2003

- Presentation about ozone to the Bureau of Land Management, Farmington Field Office: July 2002

- Ozone Task Force formation and selection of Task Force Steering Committee: October 10, 2002

- Meetings with the Task Force Steering Committee or entire Task Force: November 20, 2002; December 11, 2002; January 15, 2003; April 16, 2003

- Presentations to signatory parties to introduce ozone and the EAC: December 9-12, 2002; December 16-18, 2002

- EAC Signing Ceremony: December 20, 2002

- Presentation to Four Corners Landmen Association: March 12, 2003

- Public presentation during San Juan Basin Health Department's Air Quality Forum in Durango, Colorado: April 2, 2003

- Meetings and presentations have received coverage in the press:
    - Articles, columns, editorials, and letters to the editor in the Farmington Daily-Times (http://www.daily-times.com)
    - Articles in the Durango Herald (http://www.durangoherald.com)

- Creation and maintenance of 2 webpages:
    - "Ambient Ozone Measurements in San Juan County" (http://www.nmenv.state.nm.us/aqb/projects/Ozone.html)

- "Four Corners Ozone Task Force" (http://www.nmenv.state.nm.us/ozonetf/index.html)

- Ongoing communication with EAC Signatories and Task Force

- Formation of a Technical Peer Review Committee to critique and contribute to the technical modeling work being completed in accordance with EAC milestones.

Modeling/Technical Planning Activities

During May, a contract with a technical ozone modeling contractor team was finalized. In late May, the contractor team, consisting of Alpine Geophysics, LLC and ENVIRON International Corporation, submitted to the Air Quality Bureau a recommendation report on ozone episode selection. An initial conference call between the Air Quality Bureau and the contractor team took place on June 6, 2003 to discuss episode selection and outline the formation of the Technical Peer Review Committee. The Committee was formed from Task Force members, EAC signatories, and other interested parties. Committee members include the following:

- Arizona Public Service Company
- BP
- Bureau of Land Management
- Concerned Citizens
- EPA Region 6
- Farmington City Council/EAC Signatory
- Los Alamos National Laboratory
- New Mexico Environment Department, Air Quality Bureau
- New Mexico Department of Health
- New Mexico Department of Transportation
- Public Service Company of New Mexico
- Southern Ute Indian Tribe
- Williams Field Services

The modeling contractor team submitted analyses of episode selection and a modeling protocol. The contractor team's analyses were distributed to the Committee for their consideration. Thus far, the Committee has held two conference calls with the Air Quality Bureau and the contractor team to discuss episode selection and a conceptual model. Per the modeling contract, the contractor team is scheduled to finalize episode selection and the modeling protocol in the near future.