

**National Park Service and U.S. Fish and Wildlife Service Technical Comments
New Mexico Revised Regional Haze Section 309(g) State Implementation Plan
May 25, 2011**

Reasonable Progress Goals:

The Regional Haze Rule at 40 CFR 51.309 (g) (3) requires the state to establish reasonable progress goals and implement any additional measures necessary to demonstrate reasonable progress for Class I areas not on the Colorado Plateau, consistent with the provisions of 40 CFR 51.308 (d) (1) through (4).

Given that the Class I areas in New Mexico are not meeting the uniform rate of progress in 2018 to achieve natural visibility conditions by 2064, the Regional Haze Rule requires the New Mexico Environment Department (NMED) to provide estimates when natural conditions will be achieved.

Response: Table 6-5 was added on May 2 to provide estimates of when natural conditions will be achieved.

Reasonable Progress Analysis:

NMED's reasonable progress analysis should provide an analysis of NM source categories, major sources within each category, and the potential control options for these sources to determine if reasonable control measures are available.

In Section 11.2.2, NMED cites the Four Factor Analysis performed for the Western Regional Air Partnership (WRAP) by the contractor, EC/R, Inc. (SIP Appendix E) and identifies major source categories for the WRAP states. NMED should take the next step to define major source categories in NM and discuss potential control technology options for each source category (or reference the controls discussed in the EC/R report). WRAP's 2018 Prp18b point source inventory (see table below) indicates that coal-fired electric generation and oil and gas production are the major point source categories for 802 emissions.

New Mexico Point Source Categories			NOx Prp18b (tons/yr)	SO2 Prp18b (tons/yr)
Internal Combustion Engines	Industrial	natural gas	35,357	346
	Electric Generation	natural gas	2,427	17
External Combustion Boilers	Electric Generation	coal	25,001	14,253
		natural gas	4,389	15
Industrial Processes	Mineral Products	cement (dry)	1,055	25
		cement (wet)	1,000	1,518
	Oil and Gas Production		1,704	12,645
	Petroleum Industry		905	3,177

For NOx emissions, internal combustion engines and coal-fired electric generation are the major point source categories. Oil and gas production is the major area source category for NOx emissions. As indicated above, the Class I areas in NM are not projected to meet the uniform rate

of progress in 2018 towards achieving natural visibility conditions by 2064. Therefore, it is important that NMED place special emphasis on evaluating options for further reducing visibility-impairing pollutants through the Reasonable Progress Analysis. After reviewing the most recent version of NMED's proposed SIP, we request that NMED examine and consider implementing additional emission reductions in these significant source categories.

In Section 11.2.3, NMED reports results of the four factor analyses performed by EC/R, Inc. for three refineries selected by NMED for further analysis. We request that NMED explain how these three refineries were selected for further analysis.

Response: NMED will examine and consider implementing additional emission reductions in the SIP analysis for 2013.

The region-wide EC/R Four Factor Analysis includes these source types. New Mexico relied on this analysis for these source types. Additional analysis for specific facilities was not required; however, NMED was interested in further evaluating the three refineries due to emissions and proximity to Class I areas. New Mexico through a separate process (the Four Corners Air Quality Task Force) analyzed oil and gas sources and the power plants in the four corners region, so did not do specific additional analysis through this process for those source types.

Long-Term Strategy

We ask that NMED discuss existing and expected requirements (state or federal) to reduce emissions for the major source sectors in the above table.

Response: Existing and expected state and federal requirements for all sources are outlined in the Long-Term Strategy section. NMED will review the SIP as required for the 2013 update and update this section as necessary.